

# The Brixton Society

Understanding the Past, Looking to the Future

Reg'd. Charity No.1058103, Registered with the London Forum of Amenity Societies

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17<sup>th</sup> December 2018

## **Draft Revised Lambeth Local Plan – Representations**

### **1. Introduction**

We are responding to the draft revision of the Lambeth Local Plan as published on 22<sup>nd</sup> October.

The Brixton Society was established in 1975 as the amenity society covering the wider Brixton area. We are registered with the London Forum of Amenity Societies, and keep in touch with the London Sustainability Exchange, the Brixton Business Improvement District and Transition Town Brixton. We regularly comment on local plans, policy changes and individual planning applications, and try to promote good practice in our area.

We have examined the proposals in the context of our area of Central Lambeth, and our detailed comments are set out below.

### **2. Overview**

The aerial view on the front cover of this edition is emblematic of how much change has taken place in the past decade, including:

- Development of the Black Cultural Archives at 1-3 Effra Road, including a new projecting front wing.
- Incremental changes to Windrush Square since re-opening in 2011, including substantial increase in cycle parking.
- New Hotel development above former Woolworths' store.
- Unauthorised advertising hoardings obscuring fine 1930s façade of the Prince of Wales pub.
- Recurrent proposals for residential development within Piano House (top left of picture) threatening local workspace.
- Refurbishment of the Town Hall, including new roof-scape.

Clearly a more up-to-date picture is required!

### **3. Section 5 – Housing Policies**

#### **H6 Residential Conversions:**

There is an overhang of Victorian and Edwardian houses which are too large and unwieldy for modern family occupation, but capable of adaptation and continued use.

We therefore welcome the removal of restrictions on the proportion of conversions within individual streets (policy H6a). Past policies have increased the number of un-registered HMOs, rather than protecting family-size dwellings.

We consider that the minimum area threshold can safely be set a little lower. Based on the National space standards, a one-bedroom flat at 50 sq.m and a two-bedroom maisonette at 70 sq.m would require only 120 sq.m in total, unless there is also a shared entrance hall (typically 4 sq.m).

#### **H11 Estate Regeneration, and EN1a(ii)**

It is strongly felt that wholesale demolition of an estate should only take place after a favourable ballot of all estate residents.

While it must be tempting to build on amenity space within older housing estates, it should be remembered that it was originally provided for purposes such as outdoor playspace, allowing adequate daylighting between taller blocks, and limiting overall estate density in accordance with earlier Borough plans.

Infill development will be supported where it provides complementary extra accommodation without the massive disruption and delay of rebuilding a whole estate.

### **4. Section 6 – Economic Development and Town Centres**

#### **ED2 Affordable Workspace:**

In para a(iii), the concept of the Brixton Creative Enterprise Zone is supported, but the boundaries of the “Brixton Major Centre” are not clear. There should be an explicit cross-reference to a map. Possibly Map 5 is relevant but that would not be clear to applicants for planning permission.

#### **ED3 KIBAs:**

We object to the deletion of the Waterworks Road KIBA (Brixton Hill, map 2.10). This KIBA has been gradually diluted by the Council’s failure to enforce this policy, and deletion would only encourage developers to defy the KIBA policy more widely around the borough.

We support the proposed KIBAs on Acre Lane and Belinda Road. We also welcome the Parade Mews KIBA (map 2.15) though this is just beyond our boundary.

#### **ED8 Evening Economy:**

The proposed changes are welcome. However the proposed boundary (map 5) of the Brixton Evening Economy Management Zone is ridiculously small. Ideally it should cover the whole of Brixton Town Centre, but as a minimum to protect existing residential accommodation, it must include:

- The triangle bounded by Atlantic Road, Brixton Road and Coldharbour Lane;
- 1-9 Acre Lane (mainly to protect residents of Porden Road);
- The block bounded by Brixton Station Road, Popes Road, Canterbury Crescent and Brixton Road.

#### **ED14 Hotels:**

As a minimum, hotel proposals should provide pick-up/ set-down points for taxis, and ideally for coaches. Otherwise the policy changes are welcome.

### **5. Section 7 – Social Infrastructure**

#### **S3 Schools:**

Since the demise of ILEA in 1990, Central Government has tended to allow schools more autonomy while reducing the involvement of the local authority, making borough-wide planning for changes in pupil numbers more difficult. Nevertheless, if the Council's aspirations for increased housing density are realised, particularly if a significant proportion of family dwellings is maintained, demand for school provision can only increase. Recent years have seen an expansion of existing schools, within their old sites or by adding annexes on separate sites, but few such opportunities remain.

The plan fails to identify sufficient sites for its 10-15 year horizon. Inclusion of site 4 (New Park Road) is welcomed because this will complement the new housing development in the Clapham Park Master-plan. Deletion of site 2 is only acceptable because an alternative site is now being developed in Mandrell Road. Another primary school site of similar size will be needed in the wider Brixton area, to accommodate future needs, but preferably not on a main road frontage.

### **6. Section 8 – Transport & Communications**

*Comments have also been submitted separately on the borough's Transport Strategy.*

#### **T4a Public Transport:**

In para (v), bus service improvements should include a continuous route along at least Lambeth's section of the South Circular Road, and despite the deletion of para (xiii), more services along the length of Clapham Road, to relieve overcrowding on the Northern Line. Bus route P5 needs more stops to be provided between Loughborough Road and Camberwell New Road.

In para (vii), previous investigations have shown the difficulty of an Overground connection at the existing Brixton station, while opportunities have been missed for introducing new platforms at Loughborough Junction in association with redevelopment of industrial sites. Therefore the preferred option should be the re-opening of East Brixton station, which would offer comparable interchange to that between Clapham North (Northern Line) and Clapham High Street (Overground).

### **7. Section 9 – Environment & Green Infrastructure**

**EN1 Open space, green infrastructure and biodiversity:**

A growing problem is the increased use of major public open spaces for commercial events. Once setting-up and reinstatement times are taken into account, this substantially reduces their availability to residents. For practical purposes, these commercial uses reinforce the existing deficiency in public open space at a time when residential densities are being increased.

In respect of EN1a(ii), see our previous comments under H11 above for safeguarding amenity open space on housing estates. Initiatives such as gardening, food-growing and dedicated play-space should be encouraged, subject to respecting residents' privacy.

We welcome the additional SINCS on the east side of Brixton Hill (map 8.4) and on railway embankments north of Herne Hill station (map 8.5).

**8. Section 10 – Quality****Q11 Building Alterations and Extensions:**

In paras c and d, we welcome that a distinction has finally been made between the built forms of early and late 19<sup>th</sup> century housing development.

In para (m), roof additions and mansards should not introduce built forms which are discordant. In recent years, planners have ignored the text of existing policies and allowed many mansard extensions on late Victorian houses which would only be appropriate on early 19<sup>th</sup> century properties.

In para (o), the main consideration in the acceptability of roof terraces and balconies should be the impact on neighbours in respect of overlooking or noise. Green roofs should be promoted as an alternative for flat roofs where regular resident access is not acceptable.

**Q14 Backland Development:**

In para c(i) it would be better to define the retained garden space in square metres, based on policy H5, rather than a percentage basis. As presently worded, there is a strong incentive to remove the "host" building to maximise housing gain.

Otherwise the changes are welcome.

**Q26 Tall Buildings:**

In para c(i), more consideration should be given to the situation where two or more tall buildings are being proposed close together, perhaps by different developers. Key issues are daylight, overshadowing and mutual privacy. If there are already relevant policies in the Plan, cross references should be provided here.

Otherwise the policy changes are welcomed.

**Q27 Basements:**

We welcome that this topic now has its own policy, rather than a cumbersome SPD.

In para e(iv), the use of open basement areas with railings or balustrades is to be preferred for Victorian properties, as a reinstatement of original design features.

## 9. Section 11 – Places & Neighbourhoods

### **PN3 Brixton:**

What is not clear is the extent of the area where this policy package applies. Map 5 shows a reduced “Major Centre” boundary to previous Town Centre plans, though some sites described under PN3 now lie outside this boundary. We deplore the Council’s capricious changes in Town Centre boundaries, which work against long-term planning of improvements and only create confusion.

So disregarding Map 5, we comment as follows:

**Changes of Use:** Within paras b, c and d, target percentages are set for different uses, but it is not clear what these are percentages of. While we support the thrust of these policies, it needs to be clear whether the percentages are based on individual shopping parades, the entire street, or the Town Centre as a whole. Otherwise applicants will be able to evade the policy at appeal.

Regarding para c, the **Evening Economy Management Zone** is welcome in principle but is far too small to offer much relief to Town Centre residents, as previously referred to under ED8 above.

In para e, the **Creative Enterprise Zone** is welcome (see also ED2 above), but overall workspace provision should also provide for messy or noisy processes, including manufacturing.

In para i, (**former multi-storey car park**) we still consider that the development should include some public car parking, in order to attract a range of shoppers to Brixton, including those collecting bulky items.

In para r, **Somerleyon Road** development, note that the waste depot provision has already been removed. We are disappointed that the Council has been slow to progress the housing development, despite the enthusiasm of Brixton Green.

In para s, **Tesco site in Acre Lane**, it is important that the existing supermarket use is retained in any development.

Add new para t for **Brixton Waterworks**: Given the timescale of the plan, guide-lines should be set for the future development of the Waterworks site, since completion of the London Ring Main means its role is of diminishing importance and sooner or later Thames Water will dispose of it. In an area of open space deficiency, it is strongly felt that provision should be included for an extension of Windmill Gardens public open space. Provision should also be included for a new primary school site. A planning brief or master-plan should be developed with local stakeholders.

### **PN6 Stockwell:**

This policy is limited in scope but broadly supported.

### **PN9 Herne Hill:**

At present there is an anomaly insofar as a neighbourhood plan boundary has been approved, but not a forum to oversee it. If and when a new forum

application is made, its members may have a different view on what the boundaries should be.

In the meantime, it remains our view that the Herne Hill NP area should not include any part of SW2 or Coldharbour Ward.

**PN10 Loughborough Junction:**

These policies are broadly supported. However, an explicit addition should be made, to retain and improve the Grove Adventure Playground in Gordon Grove.

**10. Changes to the Policies Map(s)**

**Annex 14** (Strategic Areas of Regeneration) should be deleted. The shaded areas include parts of adjacent boroughs, so it is assumed this map originated with the Mayor.

Although this map appears mainly to show areas that have already experienced some regeneration – or more accurately, redevelopment – its purpose is not clear and there is no key to the meaning of the shaded areas. Some of these areas have already experienced 2 waves of redevelopment since 1945.

Potentially it could reinforce planning blight by discouraging further investment in the areas highlighted.

**11. Conclusion:**

We are willing to provide further detail or clarification on any points above.

*Alan Piper, Secretary.*