

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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Draft Revised Lambeth Local Plan – Representations

1. Introduction

We are responding to the draft revision of the Lambeth Local Plan dated January 2020.

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 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

Considerable change has taken place in the past decade, and we are concerned that the Council's planning policies have not changed sufficiently to address emerging problems and pressures on the urban context.

At a micro level, there are a number of points where the text has not been brought fully up to date, particularly with reference to developments now completed. For example, on page 358, para 11.24 says "Vauxhall Park will be improved during 2019." If this has not been done, a new date should be inserted.

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). The effect of the earlier policy has been to increase the number of un-registered HMOs, rather than to maintain a supply of family-size dwellings. It has not met the declared objective of ensuring “mixed and balanced communities”.

We suggested that the minimum area threshold could safely be set a little lower than the original 150 sq.m. The proposed threshold of 130 sq.m is welcome as it better reflects the National space standards. For example, 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, leaving some margin for a shared entrance hall and the limitations of the original room layout.

Instead of referring to the floor area “as originally constructed” it would be better to insert “as it existed 20 years ago”. Most houses for conversion will be about 150 years old, and it can be difficult to untangle what parts are original “back additions” and what are later extensions or alterations. An earlier formula used the extent of the property as at 1948, when effective planning control was introduced, but this is now at the limit of human memory even for this writer. A 20-year limit would be easier to verify and sufficient to discourage developers from extending merely to enable a conversion.

Our main reservation has been that conversions to self-contained flats can increase demand for on-street parking. Clauses b(v) & (vi) are therefore welcome in restricting availability of parking permits.

H11 Estate Regeneration, and EN1a(ii)

While the individual clauses (a) to (j) are welcome in themselves, this policy fails to take into account the views and interests of existing estate residents. It is strongly felt that wholesale demolition of an estate should only take place after a favourable ballot of all estate residents.

While it is 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. There is already a general deficiency in public open space in the western half of Brixton, under increasing pressure due to densification.

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

In environmental terms, the “greenest” building is the one that already exists. The embodied energy in existing structures should be taken into account before embarking on demolition – adaptation and re-use are preferable to new construction, minimising the generation of carbon dioxide during construction and in use.

4. Section 6 – Economic Development and Town Centres

ED2 Affordable Workspace:

We will comment more fully on the draft SPD on this topic, but the priority is to get the core policy right at the outset.

In para a(iii), the concept and extent of the Brixton Creative Enterprise Zone is supported. However, we object to the lack of affordable provision within the Town Centre boundary for developments below 5,000 sq.m. GIA. Even a reduced rate of 80% of market rents would be helpful. Also, the minimum threshold at which the policy applies should be reduced from 1,000 to 500 sq.m.

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). While this is just beyond our boundary, we are aware of Brixton residents who make use of it.

ED8 Evening Economy:

The proposed changes are welcome, but still deficient.

Firstly, the proposed boundary (map on p. 386) of the Brixton Evening Economy Management Zone is still far too small. In particular, it fails to protect the residential hinterland west of Brixton Road. We are also aware of issues out on Acre Lane and Brixton Hill. Ideally it should cover the whole Brixton Creative Enterprise Zone. As a minimum to protect existing residential accommodation, it must include the whole Brixton Town Centre, as defined in this latest draft plan.

Secondly, the policy is not keeping up with trends in food and drink uses. Recent years have seen a blurring of the distinction between A3 and A5 uses. A3 restaurants are increasingly reliant on takeaway or delivery services as a significant proportion of their turnover. At what point would a formal application for A5 use be triggered? Neither is it acceptable for the Plan to be silent on the coming trend for "dark kitchens" where all the meal production is channelled through delivery services. In both cases, the resulting volume of 2-wheel delivery traffic needs to be addressed.

ED14 Hotels:

As a minimum, hotel proposals should provide pick-up/ set-down points for taxis, and ideally for coaches. There appear to be no specific requirements for deliveries of supplies and laundry – there should at least be a cross-reference if this is covered by a more general policy elsewhere. 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 serve 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. However, 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 Brixton Liveable Neighbourhoods scheme to encourage cycling and walking over private car use.

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 definite 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 the redevelopment of industrial sites.

Therefore, the preferred option should be the re-opening of East Brixton station, which would offer interchange with Brixton's existing rail and tube services, on a par with 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 SINC's on the east side of Brixton Hill (map 8.4) and on railway embankments north of Herne Hill station (map 8.5). We propose that there should also be a SINC including Windmill Gardens, the open land above the reservoir at Brixton Waterworks, and the adjacent Windmill allotments.

8. Section 10 – Quality

We will also comment more fully on the draft Design Code SPD, but the priority is to get the core policies right at the outset. These will carry more weight in the event of planning appeals.

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 19th 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 in forms which would only be appropriate on early 19th 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 roof construction 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:

Sadly, the Council has failed to enforce its existing policies, resulting in a rash of consents for unsightly tall buildings extending beyond the “preferred” tall building zones.

We recognise that the policy changes move in the right direction, but they are still flawed.

The greatest weakness in this policy is the definition of Tall Buildings, hidden away on p.324 (para 10.147). Our area of benefit is wholly north of the South Circular Road, and the predominant building form is still 3 storey terraces, with pockets of 4/5 storey flats inserted since the 1930s and isolated tower blocks of up to 16 storeys, mostly from the 1960s. Any building rising more than **15m** above ground level will be prominent in this context and should therefore be treated as a Tall Building. The “mid-rise” category should be

deleted from the table because as drafted it allows prominent buildings to ignore the safeguards in the policy.

It would be better for the definition of Tall Buildings to be stated at the outset of the policy, rather than in supporting text, which carries less weight.

In paras a(iv) and b, 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 elsewhere in the Plan, cross references should be provided here.

In para a(v), more consideration should be given to microclimate and wind deflection/ turbulence issues. The Council should set out standards for the detail and acceptable sources for supporting evidence. We commend the criteria recently adopted by the Corporation of London as a model. This should be covered in the relevant section of the Draft Design Code if it is too unwieldy to provide this level of detail in the Local Plan itself.

Q27 Basements:

We welcome that this topic now has its own policy, but this version seems sufficiently detailed that further amplification in an SPD should not be necessary.

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

9. Section 11 – Places & Neighbourhoods

PN3 Brixton:

We deplore the Council's habit of making arbitrary changes to the Town Centre boundaries each time a new plan appears. No justification has been provided to support the boundary changes, which work against long-term planning of improvements and only create confusion.

As a result, some sites described under PN3 now lie outside this boundary.

Changes of Use: Within paras a, 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 defined sections of a street, or the Town Centre as a whole. And what about premises now outside the (variable) Town Centre boundary? 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 still too small to offer much relief to Town Centre residents, as previously explained under ED8 above.

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

Providing undifferentiated A1/B1 space below new residential development has had limited success because potential business tenants have a wider range of needs, which are not always compatible with residential use above. Developers need to be prompted to do better.

In para j, **Somerleyon Road** development (site 14), we welcome progress on the Oval House Theatre. We were disappointed that the Council failed to work with Brixton Green to expedite the housing development. This is now moving more slowly on a more conventional approach which is likely to need more management and maintenance inputs in the long term.

In para k, (**Pop Brixton**, former multi-storey car park on Site 15) we still consider that the future development should include some public car parking, in order to attract a broader range of shoppers to Brixton, including those collecting bulky items.

Note (p.395) that the current consent has been extended to 2024.

On site 16 (p.398) between the railway viaducts, principle (ix) is welcome in avoiding a canyon on either side of the railway viaducts, but the same principle should be extended to Popes Road, particularly between Atlantic Road and Brixton Station Road, to prevent it becoming a wind funnel. We are pleased to see from the Annex 11 map (p.509) that this site is outside the tall buildings area. Principle (x) is therefore welcome.

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 dedicated planning brief or master-plan should be developed with local stakeholders.

PN6 Stockwell:

This policy is limited in scope but broadly supported.

In particular, we support para a (p.423), to prevent the area degenerating to the same state as Clapham High Street.

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.

In para vi (p.452), the present wording is too reactive, and it seems that only proposals that do obvious harm will be resisted! The final sentence should be replaced by "Proposals that fail to take opportunities to meet these objectives will be resisted."

10. Changes to the Policies Map(s)

Annex 14 (Strategic Areas of Regeneration) should be deleted.

Although this map appears mainly to show areas that have already been redeveloped (some twice over since 1945) its purpose is not clear and there is no key to the meaning of the shaded areas. Potentially it could reinforce planning blight by discouraging further investment in the areas highlighted.

11. Conclusion:

As before, we are willing to provide further detail or clarification on any points above.

We formally request to be notified of:

- The submission of the above plan for independent examination;
- The publication of the Inspector's recommendations;
- The adoption of the definitive Revised Local Plan and Policies Map.

Alan Piper, Secretary.