

# The Brixton Society

Understanding the Past, Looking to the Future

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29<sup>th</sup> August 2020

Your ref:  
20/02155/FUL

## **371 BRIXTON ROAD, SW9 – Proposed change to Adult Gaming Centre:**

Dear Mr Brooksbank,

Thank you for your recent letter about the above application.  
This is a prominent site within Brixton Town Centre, and the Society must **object** on the following grounds:

### **Mix of Uses in Town Centre:**

The long-term attractiveness of Brixton Town Centre depends on maintaining a mix of uses within it, and not allowing peripheral uses to dominate to the detriment of core retail uses.

This site is within the “high street” frontage between Gresham Road and Coldharbour Lane, so the preferred use should be for A1, A2 or D1 purposes.

Lambeth Local Plan policy ED9 was rightly concerned to limit A2 uses when this class included betting shops, pawnbrokers and pay-day loan agencies. Fortunately these are now treated separately as *sui generis* uses, but the principle should be maintained, by restricting any uses such as this which tend to make Brixton residents poorer than they already are.

A B1 use would be acceptable at this end of the shopping parade, provided it had an active frontage.

Lambeth Local Plan policies PN3(a) & (j), ED6 and ED7 should be applied.

### **Narrow Footway:**

The east side of Brixton Road between the Beehive pub and Canterbury Square has a relatively narrow footway, so any new use should have its shopfront set back from the existing pavement, to ease pedestrian overcrowding. The applicants have only shown a small inset porch at the entrance, which is of little help.

**Impact on nearby dwellings:**

The proposed use is directly below residential flats with separate access from Canterbury Crescent. The Society has long supported the return of upper floors over shops to residential use, and there is now a significant number of dwellings above the shops in this section of Brixton Road.

However, the Council's failure to control over-night activities in the Town Centre has resulted in a very difficult living environment, due to noise, litter and anti-social behaviour, including use of the highway as a public toilet. We are appalled that the applicants are promoting evening use of the premises from the outset.

No use of the premises after 10 pm can be tolerated, in order to maintain Lambeth Local Plan policy ED7(b).

**Inadequate Fire Escape from Basement:**

The plans show a much larger floor area dedicated to public access at basement level than at ground floor level, extending below No.369. However, the main staircase is sited too far from the ground floor access to conform to the required minimum travel distances for safe means of escape from fire. Normally, the stairs from a basement should discharge close to the front entrance.

No specific fire safety measures are shown to mitigate this.

Although another escape route is shown at the rear, this is only via a narrow staircase and no details are shown of the final critical section via the rear yard to Canterbury Crescent – if such access is actually available. Escape into an enclosed yard is considered dangerous and not normally acceptable.

**External Plant & Ventilation:**

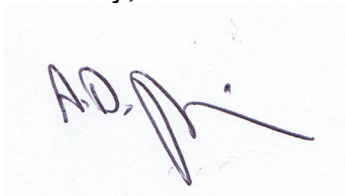
Given that the greater part of the public area is at basement level, and that some heat will be generated by the gaming appliances, as well as customers, some form of mechanical ventilation is likely to be necessary.

No specific provision is shown on the drawings supplied. The design of extract ventilation is often a critical factor in how acceptable a leisure or catering use will be in proximity to residential accommodation, due to potential nuisance from plant noise and odours.

We are concerned that hasty and ill-considered ventilation ducts and plant may be imposed on residents of the flats above as an afterthought. Any such ductwork should be routed well away from, or carried up above, the windows of adjacent residential accommodation. We cannot see how this can be done without adverse impact on the amenity of the residents above.

Lambeth Local Plan Policies Q2(v) and (vii) should be strictly applied.

Yours sincerely,



Hon. Secretary