The Brixton Society

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Planning Policy Team, London Borough of Lambeth, PO Box 734, Winchester, SO23 5DG Enquiries to: Alan Piper, RIBA, apiperbrix@aol.com

planningpolicy@lambeth.gov.uk

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Proposed Article 4 Directions for changes from Class E to Class C3

1. Introduction

We are responding to the proposals for 3 Article 4 directions to restrain changes of use from business and commercial uses (Class E) to residential use (Class C3).

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.

2. General Principles

In the past decade, we have become increasingly concerned at the displacement of commercial and employment floorspace by residential development, such that it has now become difficult for new and existing businesses to expand or even remain in the Brixton area. It is also important that business premises should be affordable and suitable for contemporary needs.

Although Central Government claims that relaxation of controls over change of use will enable more residential accommodation to be provided in urban areas, there is no obligation on developers to provide any **affordable** housing, or any cash contribution towards the same, or even to pay CIL (Community Infrastructure Levy).

Neither will there be any obligation to meet any residential design standards beyond the most basic.

Brixton Creative Enterprise Zone/...

3. Brixton Creative Enterprise Zone

The Society broadly supports the **Creative Enterprise Zone**, but overall workspace provision should also provide for messy or noisy processes, including manufacturing.

Over the past decade, attempts to retain employment floorspace have usually provided only undifferentiated A1/B1 space below new residential uses. This approach has had limited success because potential business tenants have a wider range of needs, which are not always compatible with residential use directly above.

An effective Article 4 Direction at least ensures that proposals are subjected to proper scrutiny, but developers still need to be prompted to do better.

We welcome that the Creative Enterprise Zone boundaries are widely drawn, so we need not comment here on individual sites or KIBAs within it.

4. Key Industrial & Business Areas

We support the protection of KIBAs within our area of benefit, i.e.

Map 2 - Camberwell Trading Estate/ Lilford Road;

Map 5 – Coldharbour Lane/ Bengeworth Road;

Map 7 – Ellerslie Industrial Estate;

Map 8 – Hackford Walk;

Map 10 – Kennington Business Park;

Map 16 – Somers Place.

We also welcome the protection of the Parade Mews KIBA (map 14). While this is just beyond our boundary, we are aware of Brixton residents who make use of it.

5. Lambeth's Sector of the Central Activities Zone

This is outside our area of interest, so we leave it to others with local knowledge to comment.

6. Conclusion:

The Society supports the proposed Article 4 Directions affecting its own area of benefit.

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

We formally request to be notified of the outcome of Lambeth's application for these Article 4 Directions.

NO.M Alan Piper, Secretary.