

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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NATIONAL PLANNING POLICY FRAMEWORK

Dear Sirs,

I write on behalf of the Brixton Society to forward our comments on the proposed changes to the NPPF. We have limited our responses to those issues which most affect our area of Inner London.

The Brixton Society was established in 1975 as the amenity society covering the wider Brixton area. We are members of Civic Voice and the London Forum of Amenity Societies.

We regularly comment on local plans, policy changes and individual planning applications, and try to promote good practice within our area.

We have always been interested in housing issues affecting our area of Central Lambeth, but we also aim to ensure that our area has a range of amenities and employment in the locality.

Chapter 3

Question 6 – Sustainable Development

Partly. Sustainability needs to be considered in the broad sense of the whole community, as well as taking a long-term view of the ability of a proposed use or building to survive in its context.

We understand the desire to increase housing capacity by higher density development and building on non-housing land. However, half a century of housing development in our area, together with current high market values, has resulted in the displacement of local employment and services. It has become increasingly difficult to protect existing sites for employment, education, health services and public open space in the face of market pressures.

We agree that vacant and previously undeveloped land should be brought into housing use, but we are concerned that the proposed wording of Paragraph 14 might be taken by developers as a signal that existing employment sites are also up for grabs.

In recent years, Lambeth and other Inner London boroughs have seen a significant loss of industrial and other employment-generating sites to housing development, mainly as a result of the uplift in land value in the new use.

In response, many London boroughs have developed policies to protect existing employment sites. These particularly identify areas where light industry, research and creative industries are clustered and can share the benefits of co-location. Examples are Lambeth's Key Industrial & Business Areas, and Camden's protection of the Jewellery quarter in Hatton Garden.

Therefore we propose that:

1. Para 14 should make clear that the presumption in favour of housing applies only to vacant/ previously occupied brownfield sites, and does not over-ride local policies protecting existing employment uses which meet the needs of local business and employees.
2. Where industrial sites are released for housing development, the benefit of the uplift in land value should be shared with the local community, for example through an increase in the proportion of social rent housing provided on the site.

See also our comments below on Chapter 7.

Question 7 – Housing Supply Pipeline

We question the sustainability of requiring an ongoing supply of new housing from every local authority, apparently in perpetuity. This has been an undue burden for Inner London Boroughs, placing greater pressure on their local amenities and environment.

We welcome the recent easing of the development pressure by scaling back the housing target for our own borough.

Nevertheless, planning permissions granted in recent years have been running ahead of the borough target, so while our planners may fuss over details, they have not been hostile to development.

However, a proportion of approved schemes remain unbuilt as a result either of high interest rates, changing technical standards or the practical issues of carrying through over-ambitious designs.

Question 12 – Cross-boundary Strategies

Yes. Our area of benefit is solely within one borough, but we value the benefit of London-wide policies and planning through the Greater London Authority. This enables specialist land uses to be accommodated, and considerations of transport connectivity.

In recent years, we have found ourselves taking a closer interest in the Mayor's London Plan, to meet needs that cannot readily be provided for locally.

Questions 18 & 19 – Affordability

High house prices and rents are a surer indicator of local shortage than the proposed formulae.

It has been a long-standing complaint of community groups in Inner London that the definitions of “Affordability” are unrealistic. They take no account of vulnerable groups, such as those not in full-time employment or with special needs on account of age or disability.

Chapter 5 – Brownfield, Grey Belt, Green Belt.

Our area does not include any Green Belt land, so we will not comment in detail. We recognise that easing of restrictions in Outer London and beyond will take some of the development pressure off Inner London areas like ours. We support the responses by **Civic Voice** to Questions 23 & 26.

Chapter 6 – Affordable Housing

Question 47 – Social Rent

Agreed that local authorities should consider the need for housing at Social Rents.

A fundamental flaw of the whole strategy is an assumption that needs can be met solely by building for sale. At current house prices, home ownership has probably peaked. The “housebuilder” model urgently needs to be supplemented by building for rent, which could be by any of the following approaches:

- A return to conventional building by local authorities.
- A return to funding Housing Associations to build for social rent, rather than for shared ownership or leasehold sales.
- Building for rent by institutional investors, on a regulated basis with security for long-term tenants.

Questions 48-50

Agreed. The previous government’s obsession with affordable home ownership has been a diversion of effort and largely counter-productive, just increasing the number of purchasers chasing a very limited supply and thus bidding up prices.

“Starter homes” with lower space standards have also been a retrograde step.

Question 51 – Tenure and Household Mix

We support a mix of tenure types and household sizes in general.

However, we deplore the dilution of Social Rent accommodation where existing Council estates are re-developed. This too often results in a net loss of Social Rent housing during the long period of clearance and rebuilding, followed by the developer claiming the original targets are no longer viable due to rising costs.

More priority should be given to providing family-size accommodation in developments, rather than the typical developer’s preferred urban model of 2-bedroom 2-bathroom apartments.

Small Sites/...

Question 58 – Small Sites

It's probably not practical for local council planners to go out and identify small sites across their borough. A better predictor is past performance in terms of small sites considered and approved.

In practice, sites are continually being identified by small builders and self-builders. Many present difficult design challenges such as access or their relationships to adjacent buildings. Self-builders, either individually or as a co-operative, may be more successful if less bound by profitability. It is less wasteful if councils have clear policies on their preferences or concerns for small site development.

Question 60 – Upward Extensions

Upward extensions are broadly acceptable as a form of “gentle densification” but we have reservations.

We would prefer to see individual planning applications rather than a general “permitted development” right, to allow some scrutiny and provide safeguards for neighbours’ privacy.

For additional floors on existing apartment blocks, consideration must be given to the additional needs for refuse/recycling storage and cycle parking.

Chapter 7 - Infrastructure

Questions 62 & 63 – Supporting the Economy

While we understand the thrust of the proposed changes to paras 86 & 87, they focus on larger-scale sites which are unlikely to be available in Inner London.

Here, economic success depends on encouraging and safeguarding uses such as:

- Shared office-type workspaces near existing public transport hubs.
- Workplaces suitable for creative industries, including small-scale specialist manufacture or fabrication.
- Storage yards and small warehouses for builders’ merchants, to support the supply chain for building repairs and modernisation.
- Small engineering works and depots to support energy efficiency works such as heat pump installations and home insulation. This is an essential complement to the ambitions in Chapter 9 below.

Chapter 9 – Green Energy and the Environment

Questions 73 & 74

Welcomed, but due consideration also needs to be given to the carbon dioxide locked into the construction of existing buildings. The re-use of existing structures should be encouraged over complete replacement, with its associated degrading of materials during demolition.

We support the view of Civic Voice that community-led energy generation schemes should be encouraged.

Question 78 – Permeable Pavings

Existing provisions are weak and limited to front-garden parking bays.

We agree with the response from Civic Voice that permeable pavings or sustainable drainage/ storage systems should be required more generally, and be better enforced.

Chapter 11 – Planning Application Fees

In general terms, we are opposed to a drastic uplift in application fees for minor developments. This bears most heavily on householders and small businesses. The problem arises from fees not being increased for a long time, until December last year.

An uplift of 50% would be the maximum tolerable.

We are concerned that a substantial increase would be an incentive to quietly build without seeking permission. In Inner London areas with high densities, due process is essential to protect the amenities of neighbours.

For larger developments, with all the oncosts of various consultants preparing specialist reports, the application fees are normally an acceptable expense. Some cross-subsidy of minor applications would be a sensible solution.

A greater concern is that, after paying for pre-application advice and then the application fee, and given undertakings such as Section 106 agreements, the developer feels that he has in effect bought planning permission.

It would be unrealistic to expect planning application fees to cover other related planning services at the present time. The necessary increase, particularly in Inner London with higher staff and accommodation costs, would only increase the extent of evasion.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'A.D. Piper', with a long horizontal flourish extending to the right.

Alan Piper,
Secretary.