The Brixton Society

Understanding the Past, Looking to the Future
Reg'd. Charity No.1058103, Member of the London Forum of Amenity Societies
Website: www.brixtonsociety.org.uk

London Plan Team,
GLA, City Hall,
Kamal Chunchie Way,
London E16 1ZE

londonplan@london.gov.uk

14 October 2026

Draft London Plan 2026 – Comments from the Brixton Society

1. **Introduction**

We are responding to the consultation document launched on 9th May.

The Brixton Society was established in 1975 as the amenity society covering the wider Brixton area. We are members of the London Forum of Amenity Societies and of the national body, Civic Voice.
We regularly comment on national and local plans and policies affecting our area, in addition to individual planning applications, and try to promote good practice in our area.

Our comments reflect the issues which are of most concern within our area of Inner South London. These are set out below, following the sequence and headings of the Draft Plan. We have not commented on every policy, and some points are quite brief.

We also request an opportunity to explain our concerns more fully at the Examination in Public.

2. **Overview - Good Growth Objectives**

These overall objectives are broadly supported, but the danger is that whichever has the stronger market demand behind it will dominate, and the rest will be no more than fine words.
Currently it continues to be private housing development which tends to supplant all other uses, and greater efforts are needed to safeguard all the other uses and services which make for a balanced and liveable community. A blanket priority for market housing only makes it more difficult to provide or protect all these other uses.

Making Best Use of Land (Chapter 2)

3. **Optimising Land Use and Site Capacity (MBUL2)**

A failing of the current London Plan has been the lack of restraint on **housing densities.** Excessive housing densities in new development should be resisted, to protect the local character of neighbourhoods.
The Draft Plan seems to move towards reinstating some kind of density matrix, but this is far from clear, and proposed densities for Inner London still appear to be too high.

In our part of Inner London, further densification is leading to high-rise high-density developments which fail to provide acceptable environments for family housing. It is already difficult to safeguard adequate sites for all the ancillary uses that new residents will require, like healthcare and accessible local greenspaces.

Our borough has been too willing to accept very high residential densities on sites which are poorly served by public transport. Also see our comments under MBUL5 on the unreliability of PTAL scores.

4. **Tall Buildings (MBUL3)**

There are alarming discrepancies in how different boroughs define tall buildings – Lambeth only considers buildings over 45m high, while Southwark has a threshold of just 15m.
Most of our area was built 150 years ago at 3 to 4 storeys, so in this context, anything above 7 storeys or 21 metres will be prominent. Recent building safety legislation means that anything above 18m will need to meet more stringent fire safety standards.

We call for a consistent definition to apply across all London boroughs, although the proposed 30m is a little higher than we would like, and 21m would be preferred.
The 100m “metropolitan” definition should be limited to Central areas, e.g.no more than the Thames Riverside in the case of Lambeth. Even then, viewing lines and the setting of Listed Buildings must also be taken into consideration. See also under GLE9 below.

5. **Utilities (MBUL4)**

For large developments, there should be an expectation that developers will assess the increased demand on local utility services, and provide accordingly. We are particularly concerned about sewerage capacity where high-rise flats are replacing Victorian terraces.

6. **Sustainable Transport (MBUL5)**

We broadly agree that public transport investment can unlock private investment in housing and business uses.

However, for Inner London areas, Public Transport Access Levels (PTAL scores) are not a reliable indicator because the inbound trains and buses are

already full as they pass through, so in practice there is negligible capacity to carry extra passengers from new developments at peak hours. This indicator must be amended so that development proposals assess available capacity rather than theoretical PTAL scores.

Under **Public Transport**, we urge the re-opening of East Brixton Station to provide Brixton residents with access to the London Overground service. This would also provide interchange with the Victoria line and South Eastern rail services. This connection would be comparable to that existing at Clapham North/ Clapham High Street.

7. **High-quality Design (MBUL6)**

An important consideration is the distance between residential blocks, particularly for blocks of 4 storeys or more. Tall buildings grouped closely together may form a heat island, or in some circumstances, generate adverse wind effects at ground level. Access to adequate daylight and sunlight is essential.
Our borough has no published criteria for block spacing, and a London-wide standard set by the Mayor would be welcome.

8. **London's Heritage (MBUL7)**

This section of the Draft Plan seems to be unduly focussed on Central London sites, but due weight should also be given to Conservation Areas and Listed Buildings across the London Boroughs. We are disappointed that our borough appears to have lost interest in designating, extending or enhancing Conservation Areas. There has been no Conservation Areas Advisory Committee or equivalent since 1988.

Delivering Homes and Neighbourhoods (chapter 3)

9. **Housing Stock (HN1)**

A weakness of the Plan is that it fails to distinguish between Housing Demand and Housing Supply. The urgent need is for affordable housing, particularly for families with children. Rising rents mean that family homes are increasingly being occupied by households of un-related adults in order to share the cost. This is undermining the viability of local schools because households with children are being priced out.

Our impression remains that planning permissions granted in our borough are running comfortably ahead of targets, but actual development has been much slower to appear on the ground.
In Inner London areas like ours, the easy opportunities for "brownfield" development have largely been exhausted.

10. **Estates Regeneration (HN2)**

The process should always include a ballot of all estate residents – regardless of tenure – to endorse any estate redevelopment scheme.
The arguments for complete replacement of an estate are now weakened by:

- Improved techniques for retrofitting existing homes, including thermal insulation and modern amenities.
- Consideration of the embodied carbon dioxide in the existing structure and fabric.

Our organisation grew out of vigorous campaigning by residents to resist wholesale demolition of Victorian housing areas around Brixton Town Centre. Defects in the plans were exposed to public scrutiny, notably the waste of demolishing inherently sound buildings, and the marginal increases in density that would be achieved after costly new development.
As a result, CPOs were scaled back or refused, resulting in most properties being reprieved by 1976, and a series of improvement schemes being carried out instead.

In recent years, we have seen the mistakes of the 1970s being repeated in councils' enthusiasm for demolishing estates before the end of their economic life, with the same old issues of settled communities being broken up and flats being left empty for extended periods while a whole block is emptied out for demolition. We are alarmed that this process too often reduces the number of Council or social rent tenancies being provided, while densities are dramatically increased to fit in more private sector housing to finance the rebuilding.

11. **Affordable Housing (HN3)**

Despite planning permissions in our borough exceeding London Plan targets, the percentage of affordable dwellings being achieved is disappointingly low. Smaller sites should also contribute, even if it may not be practical to do so within each site.
Sadly, the trend to higher density development has allowed private developers to argue for lower percentages of affordable housing, based on the higher construction costs for high-rise forms with lifts and other services.

12. **Dwelling Mix (HN7)**

In principle, this is supported, in order to resist the tendency of private developers to focus on small dwellings to the exclusion of sufficient family-size dwellings.
Family housing with gardens is preferred.

13. **Housing Design (HN8)**

Reducing the minimum ceiling height to 2.4m is a retrograde step. Higher ceilings allow better air circulation, to mitigate the Heat Island effect of Inner London sites. Allowing 25% of the floorspace in a dwelling to be even lower than 2.4m is totally unacceptable. (Development Management B2)

Single-aspect dwellings should be avoided, because double-aspect designs allow more effective natural cross-ventilation to mitigate summer overheating. (Development Management 1)

The standards for private amenity space appear too small. Communal amenity space should include trees, to provide some shade. (Development Management B4 & C.)

Internal circulation spaces should be naturally lit and ventilated. (Development Management 5)

Growing London's Economy (chapter 4)

14. Employment Space (GLE1)

The policy is broadly welcome, and specifically policies GLE 1A, 1B and 1E. We are aware of recent applications to convert the rear parts of shops to residential use, but it is essential that the remaining street-facing business unit is still capable of continued business use. Considerations include self-contained sanitary accommodation and provision for refuse/ recycling storage.

15. Night-time Economy (GLE4)

Local experience is that expansion of the night-time economy must be planned for, in terms of infrastructure, policing and the mix of competing uses in town centres.

Brixton began to develop a significant night-time economy some 30 years ago, with a few key venues which attracted visitors from a wider area. These gradually were joined by more small-to-medium venues, either music-based or food-based.
However, at the same time, residents have been returning to the town centre, either in new apartment blocks or in renovated accommodation over the shops. A crisis has since been reached with the introduction of the Night Tube and the increase in "vertical drinking establishments", i.e, bars open late with little else to offer. The environment is rapidly deteriorating due to lack of public toilet provision, high overnight noise levels, and overcrowding around bus stops, stations, and outside venues.

We prefer a broader approach which embodies the whole of the "Experience Economy" including cultural and creative industries, visitor attractions and hospitality.
Feedback from other boroughs via Future London has highlighted the need to consider:

- Innovative growth, offering different attractions rather than "clone towns".
- The potential for attracting audiences from across London and beyond, including travel implications.
- Culture remains an important element in London's attraction for a global audience.

- Getting the local community on board. Several European destinations with high tourist footfall have already seen a backlash from residents who find visitors are a burden rather than a benefit.
- Partnership working, looking for health benefits and savings from investment in "human capital".
- Finding pathways to an inclusive economy, developing skills within the local workforce and creating opportunities for local supply chains.

16. **Culture and Creative Industries (GLE5)**

This is welcome in principle, but needs to be supported by identifying and protecting sites before they are all displaced by residential development! For example, Brixton faces the imminent loss of 4 substantial sites used by this sector, combined with ill-advised attempts by the Arch Company to re-let "improved" railway arches at much-increased rents.

17. **Visitor Infrastructure (GLE6)**

Past policy has only considered overnight accommodation. Centres like Brixton receive many day visitors, and increasingly, many more night-time visitors to entertainment venues and bars. These visitors are generally from the rest of Greater London or just beyond, and to a lesser extent, visitors from abroad who are staying in Central London hotels.
There are acute needs for public toilets and better way-finding.

Short-term lets and serviced apartments should be resisted, because they can too easily become long-term accommodation at inferior standards.

18. **Affordable Workspace (GLE7)**

Each town centre or KIBA will need closer study of local needs and business potential. Developers have tended to provide generic business space as part of new developments, but which turns out to be unsuitable for the types of business seeking space in the area. This gives developers an excuse to seek residential conversion of space that is slow to let, so that business use disappears entirely from the site.
Even willing developers need councils to provide more detailed guidance on local needs.

Intensification and Co-location: We are in favour of making more intensive use of employment sites. However, we are concerned at the trend to squeeze together ground-floor employment with dense residential development on upper floors. Such developments demand careful consideration of servicing requirements, removal of wastes and fumes, noise and operating hours. Otherwise the employment uses are likely to be displaced as a result of complaints from residents experiencing a poor living environment.

19. **Aviation (GLE9)**

The increasing use of helicopters for transporting patients to major hospitals (e.g. Kings College Hospital, with its rooftop helipad) is an important consideration when assessing acceptable heights for nearby buildings.

There is also likely to be increasing use of drones for transporting small high-value payloads (e.g. medical supplies) in addition to conventional survey and surveillance applications.

A Greener, Healthier and Resilient City (chapter 5)

20. **Energy Efficiency (GHR1)**

Broadly supported, but recent experience shows the need to add reference to cooling systems in addition to heating systems.

21. **Low-cost Low-Carbon Heat (GHR2)**

Although communal heating systems should in theory offer economies of scale, this can be negated by distribution losses. They remain unpopular with residents due to the lack of individual temperature control.
An emerging need is for a cooling function, rather than simply heating.

22. **Whole Life-cycle Carbon (GHR3)**

Assessment is fundamental to making a fair comparison between replacement or refurbishment of existing buildings.

23. **Heat Risk (GHR4)**

Passive design solutions are preferred. Green infrastructure, and particularly tree planting, should be more positively promoted for the spaces between buildings, to provide shade and evaporative cooling. Trees must be provided with sufficient space to reach maturity. See also under GHR6 below.

24. **Trees and Biodiversity (GHR6)**

Local plans should set and monitor tree-cover targets. Direct replacement of mature trees by new trees on a one-for-one basis will always produce a drastic reduction in tree cover in the short term. There can also be a high mortality rate among new trees due to vandalism or inadequate watering or aftercare. More generous replanting should be the norm.

The selection of tree species for new planting needs to take account of likely more extreme conditions in future, particularly higher temperatures and drought conditions. The use of traditional native hardwoods cannot be relied on.

25. **Green Infrastructure and Urban Greening Factor (GHR7)**

As it stands, Urban Greening policy has mainly aimed at reducing the speed of rainwater run-off into the overloaded sewers. We prefer a broader design approach which also enables an increase in biodiversity, not just as a spin-off from new development, but also to be encouraged in retrofit projects and the management of existing open spaces.

26. **Accessible Green Space (GHR8)**

Local Green and Open Space: We propose that:

- The quality of existing green space should be improved by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Outdoor sports facilities, both formal and informal, should be protected and enhanced.
- Private and public gardens, including their trees and planting, make substantial contributions to biodiversity and urban greening generally, and this should be considered in assessing development proposals.

Sports and Recreation: There should be stronger safeguards for existing open space from encroachment by specialist sports buildings or facilities. After all, green open spaces are beneficial to a wider section of residents by age or ability – quiet or informal recreation needs to be given more weight. Landscape quality and biodiversity should also be taken into account.

27. **Air Quality (GHR10)**

This remains an acute issue in our area, particularly with our Town Centre straddling the A23, where annual exposure limits are still exceeded after only 6 weeks.
Low Traffic Neighbourhoods and similar schemes can provide local improvements, but experience suggests these are often offset by increased pollution elsewhere from displaced traffic.

Good design practice should include:

- Living accommodation should be sited away from the roadside and be arranged as dual aspect to allow natural ventilation from the rear or side.
- Street or building configurations should be avoided which create a canyon effect or otherwise result in concentrations of air pollution which is unable to disperse easily.
- CIL funds should be made available for measures to mitigate or reduce air pollution. Section 106 contributions should be sought from those developments with potential to raise air pollution or obstruct dispersal of local concentrations.

Cycle & Car Parking/…

28. **Cycle and Car Parking (GHR11)**

We urge that provision for electric vehicle charging points is included in any substantial parking provision for commercial or leisure uses. This should include cycle parking provision, where precautions are needed to minimise the fire risk from re-charging in residential buildings.

We are also concerned to note the shrinking number of conventional petrol stations, so provision for refuelling with lower-emission fuels (hydrogen, LPG, CNG) should be encouraged.

Place Visions and Place-based Approaches (chapter 6)

29. **Town Centres and High Streets (PV3)**

These points apply specifically to Brixton Town Centre, but may have wider applications:

- Shopping frontages should be linked, avoiding dead breaks which isolate peripheral sites. Careful consideration should be given to pedestrian footfall, circulation routes and road crossings.
- Market stalls and covered market arcades provide relatively easy entry into retail trading for businesses which may grow in future. Yet they also require facilities such as storage for stock and barrows, and parking for traders' vans.
- Careful consideration must be given to introducing residential uses (either new-build or refurbishment) particularly where there are active late-night uses.

30. **Soundness generally**

We are concerned to achieve policies which are positive, appropriate and deliverable. Several of the policies in the Draft Plan are promising, but need modification to make them more effective. We have suggested above where changes need to be made.

31. **Conclusion:**

We are willing to provide further detail or clarification on key points above, either shortly, or at an Examination in Public in due course.