



## **Brockley Cross Action Group**

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Registered Charity: 1111176

### **Introduction**

The Brockley Cross Action Group has been active for nearly ten years and exists to "celebrate, empower and improve the community and environment of Brockley Cross". The group has led on a number of initiatives, in particular the Urban Design Strategy in 2004, Brockley Max and the Brockley Common open space and accessibility project. The group is active on the Ward Assembly and has inspired the development of a number of similar groups within the borough.

We welcome the opportunity to comment on the soundness of the draft Core Strategy and must congratulate officers and all those concerned with regard to the volume of evidence that has been assembled and carefully considered in arriving at the draft proposals. We have tried to limit our comments to the test of soundness relative to the evidence and proposals in the context of the passion and understanding we have of the opportunities, trends and pressures in our own community.

Our main focus in this submission is the significant effect the opening of the East London line (and reduction of Southern Rail services) will have on Brockley and indeed the whole West Lewisham corridor along its route. We feel the market, economic, transport, social and environmental effects have been significantly underestimated. Although this corridor isn't designated in the Core Strategy as a regeneration area, we think it will be a corridor of significant and relatively fast change which, without sound planning mechanisms could take us all by surprise.

### **Core Strategy Policy 14: Sustainable Movement and Transport**

Brockley is typical of Lewisham's residential/dormitory status with a high number of adults between ages of 25 and 44, comparatively low car ownership, reflecting not poverty but lifestyle, Brockley's travel Zone 2 designation and a high dependency on public transport. This dependency is a significant political as well as day to day issue in Brockley given the current levels of crowding on the trains and the domination of Brockley Cross by vehicle transport.

We have looked at the evidence base<sup>1</sup> with interest. Table 7.2 shows that the Brockley Ward will see a 19.7% decrease in bus use and a 11.4% in rail use and 31.1% in DLR and ELL use between 2010 and 2026. For Brockley to New Cross Gate this increase is 24.6% by 2026 with a total of 19,620 travelling in the AM Peak. Morning volumes and increases further down the slow up-line (Honour Oak and Forest Hill to Brockley stretch) are much bigger. Table 7.6 shows crush capacity compared with 2006 level (at 159%) back up to 118% by 2016 and 125% by 2026. However this is based on 18 trains per hour in the AM peak period. **We understand this isn't correct**

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<sup>1</sup> Lewisham Borough Wide Transport Study, Colin Buchanan, draft final report, 2010

**and the actual planned figure is 14 trains per hour<sup>2</sup>. This is 22% less capacity at morning peak than stated in the evidence – even though the study rather depressingly concludes:**

*(In Lewisham), “Brockley station will continue to have the highest volume over capacity proportion, whilst services from New Cross and New Cross Gate towards London Bridge will remain overcrowded in 2026.”<sup>3</sup>*

Some of this difference is due to the London Bridger to Victoria line train service being controversially axed, forcing more passengers to access Victoria via London Bridge or Canada Water from 2010. There remains, however a significant demand within Brockley and beyond for a direct train link to Victoria and it was a considerable disappointment to the community that Network’s Rail Strategic 10 year plan (2007?) (supported by Lewisham Council) did not support a new station at Brockley Cross (The ‘High Level’ station) providing a fast service to Victoria.

The absence of a Core Strategy proposal to the predicted long-term Brockley crush capacity is therefore disappointing, particularly given that the Dartford-Victoria service (via the High level track at Brockley) is shown as running at only 81-100 percent full during the period 2010-2026. The Colin Buchanan study provides no recommendation against the conclusion in para 7.6.13. However, we feel the evidence provides a compelling case for the High Level station option to be re-examined. In this respect we do not consider the Core Strategy to be entirely ‘Sound’. This conclusion is also re-inforced by our concerns about the population shifts and increases likely to accompany the arrival of the East London Line in West Lewisham.

### **Core Strategy Policy 1; Housing Provision, Mix and Affordability**

Whilst we support Lewisham’s affordable housing policy, we are concerned about how far the market evidence base connects with core strategy policies. Neither Strategic Housing Market Assessments (SE London and Lewisham SMHAs) clearly link the future demand to accessible transport. This alongside price is one of the most important reasons so many younger households are forming or moving into Brockley. In other words the market housing effect of the East London line service and additional capacity on DLR, London Overground services and buses isn’t really assessed.

The evidence base shows that 41.5% of all market households (in Lewisham) are families (one or more child) and 30% are unsuitably housed and most of these are concentrated in north of borough. In addition 36% of people in Lewisham want to move compared with 27% in the rest of south east London and nearly a half of these want to move because they want/need more space.

The, above together with the large and active buy to let sector in Lewisham is leading to a very high rate of moving (‘churn’). 67% of all those living at their current address for less than a year are private sector tenants (an astonishing 11, 581 households across Lewisham). Market affordability and provision is therefore clearly

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<sup>2</sup> Letter from Dept fr Transport to Sydenham Society 31/03/2010

<sup>3</sup> Colin Buchanan Transport study para7.6.13

a significant issue and we have real concerns that this degree of movement is very de-stabilising to communities and undermines efforts to build sustainable communities. Furthermore we are not convinced that the draft core strategy will mobilise the planning system to do much about this. As the SHMA states:

*“In short, Buy To Let landlords have significantly re shaped the local market by buying family sized properties and converting them into smaller self-contained units. This has, of course, always happened but it is the recent rate and scale of activity which is notable, as it has removed a volume of family sized stock from the overall existing supply. This, in turn, has effectively led to a scarcity premium being applied to the remaining family sized private rented stock.”<sup>4</sup>*

When you consider the above, together with the evidence base also concluding that market demand is for one and two bedroom homes (i.e. more apartments), there must surely be a question as to whether the actual rate of family houses being converted in Brockley Cross into market rented and non-family flats will not significantly increase with the new overground services, thereby further eroding Brockley’s ability to provide opportunities for younger households to stay and bring up their families or new families to settle in this part of the borough.

Given that there are so few sites where 10 or more homes can be built (and therefore core strategy 1 applying), we feel both the evidence base and the Core Strategy itself is not ‘Sound’ in this respect and we would like to see stronger policies to address this within district and local hubs which are under particular pressure from market trends like this including Brockley Cross.

#### **Core Strategy Policy 6: Retail hierarchy and location of retail development**

BXAG supports many aspects of this strategy and in particular the Council’s wish to see a range of local services provided as close to people’s homes as possible. However the Core Strategy also locates and promotes any identified retail expansion in existing town centres rather than throughout the different local and district centres as well. The evidence base for this fails to make much of the huge shifts taking place in shopping habits (e.g. internet shopping a 15-18% increase locally between just 2004 and 2009 in the household survey conducted by NEMS Market Research) and the challenges of peak oil and climate change, all of which will tend to favour more local shopping as bus and car trips to carry goods becomes more and more expensive and the pressure to reduce unnecessary journeys intensifies.

The Draft Core Strategy identifies 7 district town centres including New Cross, and 5 neighbourhood local centres including Brockley Cross. It identifies PPS 6 as providing the policy basis with its emphasis on providing a range of shopping, leisure and local services which allow genuine choice and provide access for all, particularly socially excluded groups. However, the evidence base, the Lewisham Retail Capacity 2009 did not look beyond the Town Centres and District Centres, even though the shift in trends from 2004 seem to suggest less use of the car and less reliance on the big 4 national supermarkets. We do not therefore feel the local evidence base to appropriately interpret PPS 6 and base all growth in the Town Centres is ‘Sound’ or looking clearly enough at future trends.

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<sup>4</sup> Para 8.17, Housing Market Assessment, 2007-2008, Dec 2009

### **Spatial Policy 4 Local Hubs**

The Action Group is very pleased to see Brockley Cross designated as a 'Local Hub' and welcomes the emphasis on physical and environmental improvement together with close working with the local community and other stakeholders. We note that Brockley Cross is the only Local Hub on the new integrated Overground Service which will be fully operational in 2010 and that this will bring new opportunities and challenges that may not have been fully assessed enough in the core evidence base.

**Policy 2D.** Whilst we understand the range of services in a hub cannot be over-prescriptive, we would like to see the evidence base for essential community infrastructure applied more dynamically to the hubs, for example identifying the importance of having a community centre, doctors surgery, post office, fitness suite etc as well as, "an adequate range of shops to meet everyday needs". We have raised our concerns with regard to Core Strategy Policy 6 above and would argue here that retail provision at local hubs should be allowed to develop more flexibly than policy 2D suggests to allow, e.g. clothing, consumer electronics, banking and jewellery to flourish in such locations if there is market interest.

We would also like to see more support for traders and more links with strategies such as the Shop Front Improvement Pot which could be linked to Brockley station approach improvements as suggested in the current Town Centre Management strategy<sup>5</sup>.

**Housing Provision.** The boundaries of the Brockley Cross Hub are not defined, but we note that Spatial Policy 5, 1C Conversions and the need to provide family houses may not apply, even though there are significant numbers of family dwelling within the hub. We would therefore like to see the rate of conversions within hubs scrutinised as critically as in the areas of managed change and feel Spatial Policy 4 needs clarifying in this respect.

**Policy 2A Retention of LELS,** many of the arguments for protecting such locations could also be applied to the many mews within Brockley Cross. We consider these areas as particularly suitable for creative businesses and feel that the evidence base doesn't drill down in enough detail to show the demand for premises from cultural business and artists. The evidence base behind the Arts and Cultural Strategy seems thin and we would have liked to see a more accurate figure for planning purposes. Given the apparent density of artists and artisans living in Brockley Cross and the wider Brockley, we would like to see the emergence of a mews development framework which could provide the focus for an exciting new 'cultural clusters' in these areas of the borough. We do not therefore consider the Core strategy 'Sound' in this particular respect.

**Policy 3c Open space and Environmental Assets,** we note that Brockley Cross continues to be in an area of Local Park Deficiency. The Action Group, with support from the Council has worked hard to transform Network Rail wasteland into accessible public open space (Brockley Common). There is a similar, large empty (for several decades) Network Rail site on the corner of Endwell Road and Mantle Road

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<sup>5</sup> Town Centre Management Strategy, London Borough of Lewisham, 2007-2010 Strategic Aim 6:

which might also help to meet this policy, but which isn't identified in the open space study.

Lewisham's Leisure and Open space Policy Jan 2010 also identifies Brockley Cross as outside of the catchment areas of any of Lewisham's or Southwark's current pools. The open space study also appears to suggest the wider Brockley has no cemetery – which it does.

The Action Group is particularly concerned about the impact of noise in the public realm and would like to see the new planning directive on local authorities to provide 'Quiet Areas' in the near future integrated into the Core Strategy.

**Policy 4A. Sustainable movement.** We welcome the recognition that the approach to Brockley station requires improvements to the street-scene and note that this relates strongly to policy 4B (community safety). In Brockley Cross Hub this also relates strongly to Brockley Cross double roundabout which many station users also have to navigate each day. We are disappointed, however that neither of these policies appear to relate clearly enough to journey to work and journey to school patterns.

Stuart Woodin, BXAG April 5<sup>th</sup> 2010