

Comment submitted date: Mon 14 Aug 2017

Dear colleagues

I have tried to submit comments via the planning portal but the site tells me that comments are not being accepted. I understand that today is the deadline for responses and I trust that my comments will be accepted. I would also like to know what will happen in regard to others trying to submit a comment to you. Please acknowledge receipt of this email promptly. Please also publish my comments on the website and therefore in the public domain as they are not intended to be private.

I have read the CEMP submitted by Network Rail in order to discharge a part of planning conditions and I have little confidence that the measures set out therein will succeed in achieving the mitigations and safeguarding they are intended to. I am not going to go through points one by one as I don't have time but instead make some more general comments about the document overall.

Brixton town centre is a very unique place and the project in hand is a very complex one, which in my opinion is not appropriate in this setting. It would require a very thoughtful and thorough approach to achieve an undertaking of this type without causing significant disruption and risk. Unfortunately the CEMP appears to be very generic and depends upon various strategies which have yet to be developed, it also references baselines upon which suggested mitigations are dependent but does not include them.

I note that the constraints recognised in this context are those of a major shopping centre and of a conservation area. It seems to me that little attention has been paid to either in the document, which demonstrates a similar lack of regard to the unique characteristics of the area, as does the poor design of the scheme. Nor do these constraints adequately reflect the fact that this is a major transport hub and a through route for huge levels of public transport, that traffic management is difficult at the best of times, that there is extremely heavy footfall with a 24-hour economy, that adjacent businesses with party walls need to continue to operate, that we have a significant residential population in the immediate area, and that the street market on Popes and Station roads will have to operate at a sustained level throughout the duration of the works - quite possibly up to four years - if they are to survive. Waste management is

certain to be problematic; we already have the worst air in Europe on Brixton Rd and any deterioration in air quality will endanger health, if not life; I am concerned about toxicity and hazardous waste given the industrial nature of the site and likely existence of arsenic, lead and other substances in such close proximity to the railway. The poor condition of the structures – a direct result of the custodianship of Network Rail and its predecessors – is bound to make this a bigger, dirtier and more dangerous job than it would otherwise have been. Noise and vibration is also bound to be an issue, and the assumption that limiting this to times when people are at work is simply misguided – there are many people who live in the area who are retired, not working, with disabilities or looking after children and other dependants at home. This is to say nothing of the people who work in and visit the area. I am very concerned about the businesses which share party walls being safe and able to operate under these circumstances. The CEMP mentions issuing dust masks "as a minimum" – is it intended that market traders and visitors to Brixton Rec, Pop Brixton and Brixton Village should avail themselves of these as well? It is mooted that site workers will use public car parks in Brixton – parking is already very problematic and this will only deter even more shoppers and visitors – that is those who do not want to buy or eat food, etc, on a building site.

It is no secret that I have opposed this scheme from the outset and I think it is ill considered, profit-driven and probably completely unworkable. The CEMP demonstrates a comparable lack of thought, investment and sensitivity to the environment as does the plan overall. I do not believe the project can be delivered as set out in the CEMP without an unacceptable level of disruption and danger to the local community and to those who work in and visit Brixton. It is also likely to lead to the demise of yet more small local businesses, adding to the toll created by the evictions.

Finally, I think that the information about raising and responding to complaints is very flimsy indeed and should be considerably improved upon.

I hope that satisfactory answers can be found to all the above prior to the commencement of this scheme. I look forward to your response.

Councillor Rachel Heywood  
Coldharbour Ward