



20-24 POPE'S ROAD, BRIXTON,

PLANNING STATEMENT ADDENDUM

July 2020

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CONTENTS

1. INTRODUCTION.....	2
2. SUMMARY OF KEY FEEDBACK RECEIVED	4
3. THE REVISED SCHEME	7
4. PLANNING POLICY ASSESSMENT	11
5. PLANNING BENEFITS	21
6. PLANNING OBLIGATIONS	25
7. CONCLUSION	26

1. INTRODUCTION

1.1 This Planning Statement Addendum has been prepared by DP9 Ltd (DP9) on behalf of AG Hondo Pope's Road BV ('the Applicant') in support of the design amendments to the submitted planning application (Ref: 20/01347/FUL), which proposes the redevelopment of 20-24 Pope's Road, London, SW9 8JB ('the Site').

1.2 The submitted planning application was validated by the London Borough of Lambeth ('LBL') on 16th April 2020. The originally submitted proposals comprised the comprehensive office-led, mixed-use redevelopment of the Site, through demolition of existing buildings on the site and erection of a building up to 19-storeys in height comprising 25,445 sqm (GIA) of new Class B1 floorspace (including affordable workspace), 2,910 sqm (GIA) of flexible Class A1/A3 provision, 647 sqm of D1/D2 use alongside new public realm, plant, cycle parking and associated works.

1.3 Following submission of the planning application, a series of comments were received from London Borough of Lambeth (LBL) and other relevant consultees and stakeholders concerning the proposed scheme. These comments notably raised concerns over the proposed siting of the new building, and the impact the building line would have on the public realm adjacent to Pope's Road. Having reviewed feedback, the Applicant is now proposing to revise the proposed development. The description of development for the Revised Scheme remains as per the originally submitted scheme as follows:

“Demolition of existing building and erection of a part G + 19, part G + 8 storey building comprising flexible A1/A3/B1/D1/D2 uses at basement, ground and first floor, restaurant use (A3) at floor 8 and B1 accommodation on floors 2 to 19, with plant enclosure at roof level, and associated cycle parking, servicing and all necessary enabling works.”

1.4 This Planning Statement Addendum assesses the planning considerations associated with the Revised Scheme. In addition to this document, the following documents have also been submitted to LBL:

- Site Location Plan, prepared by Adjaye Associates (replaces original),
- Design and Access Statement Addendum, prepared by Adjaye Associates (to be read alongside original),
- Existing and Proposed Drawings, prepared by Adjaye Associates (replace originals),
- Daylight and Sunlight Report Addendum, prepared by GIA (replaces original),

- Solar Glare Addendum, prepared by GIA (to be read alongside original),
- Townscape & Heritage Assessment Addendum, prepared by Robert Tavernor (replaces original),
- Transport Assessment Addendum, prepared by Caneparo Associates (to be read alongside original),
- Travel Plan Addendum, prepared by Caneparo Associates (to be read alongside original),
- Delivery & Waste Management Plan addendum, prepared by Caneparo Associates (to be read alongside original),
- Construction Logistics Plan addendum, prepared by Caneparo Associates (to be read alongside original),
- Energy Statement Addendum, prepared by HPF (to be read alongside original),
- Sustainability Statement Addendum, prepared by HPF (to be read alongside original),
- Air Quality Statement of Conformity, prepared by Trium,
- Urban Baseline & Design Assessment Statement of Conformity, prepared by Space Syntax,
- Flood Risk Assessment Statement of Conformity, prepared by AKT II,
- Drainage Assessment Statement of Conformity, prepared by AKT II,
- Basement Impact Assessment Statement of Conformity, prepared by AKT II,
- Ecological Appraisal Statement of Conformity, prepared by Trium,
- Wind Assessment Addendum, prepared by Trium (replaces original),
- Archaeology Assessment Statement of Conformity, prepared by Trium,
- Noise & Vibration Statement of Conformity, prepared by Sandy Brown,
- Construction Management Plan Statement of Conformity, prepared by Blue Sky Building,
- Economic Impact Assessment Addendum, prepared by Volterra (to be read alongside original),
- Employment & Skills Plan Addendum, prepared by Volterra (to be read alongside original),
- Community and Commercial Use Strategy prepared by Lowick and Brixton Project
- Pope's Road Public Realm and Art Strategy prepared by Gort Scott.

2. SUMMARY OF KEY FEEDBACK RECEIVED

2.1. Following submission of the original planning application, a series of comments and consultation responses were received from key stakeholders concerning the proposals. A summary of the key issues raised during the consultation period is set out below.

Design Matters

2.2. Following discussions with LBL post submission of the application, Officers recommended that the proposed building line is set back which in turn would open up Pope's Road to provide additional public space improving the public realm. In line with the Site Allocation 16 LBL's aspiration for Pope's Road is to provide a new civic space which can accommodate a future new Brixton station entrance as well as future growth of the street markets. The comments received are set out below:

- The submitted building line denies the opportunity to meaningfully widen Pope's Road and create a more generous civic space that supports its future function, including a significant increase in footfall generated by new development and the new station entrance, alongside its role as a street market.
- The building line as proposed maintains, or even slightly narrows, the pavement on the eastern side of Pope's Road which could create greater scope for conflict with vehicle movements along the road and will create a perception of a more cramped public realm on this side of Pope's Road
- The building line prevents the opportunity to create a threshold to a development which will generate a significant number of pedestrian trips in both peak hours and during the day, placing additional strain on Pope's Road
- The combination of building siting will result in a building which will feel potentially overbearing and oppressive when experienced from Pope's Road, undermining its value as a place to arrive, meet, dwell and shop
- The proposed building line misses the opportunity to set back and reveal the adjacent railway arches, thereby celebrating the potentially engaging relationship they can have with the development between the viaducts and encouraging footfall along the viaducts by indicating intimate and interesting new public routes and space that exist.

2.3. Officers commented that 'moving back' the building line from Pope's Road would be beneficial to the scheme and to the wider Brixton area, and that greater activation of

the ground floor of the building on the Pope's Road elevation would create an enhanced active frontage and better fulfil the scheme's function.

Heritage

- 2.4. The consultation response received from Historic England outlined that the scheme would have no physical impact on any heritage assets, but that as a result of the scheme's height and massing the building would be appreciable from a wide range of vantage points, and its principle impact would therefore be on the setting of the Brixton Conservation Area and, to a lesser extent, on nearby listed buildings.
- 2.5. Historic England objected to the submitted application "on the *basis of the harm they would cause to the significance of the Brixton Conservation Area through development within its setting*" (18 May 2020). This would be perceived harm to the setting of the Brixton Conservation Area as the site lies outside the conservation area. HE also found a lesser degree of harm to the setting of Church of St Matthew (Grade II* Listed). Under the terms of the NPPF, Historic England confirm that that the harm is 'less than substantial.' A response to the comments raised by HE is set out further in paragraphs 4.15 -4.21.

Energy

- 2.6. Comments received by LBL on 28th May 2020 stated that the development in its submitted form did not meet the required 35% reduction in CO2 emissions on site. The energy strategy submitted confirmed that the current scheme would achieve 31.5 %. A revised Energy Strategy was therefore requested to demonstrate how the 35% reduction will be met on site.
- 2.7. The comments also noted that the scheme represents an opportunity to develop a heat network in the Brixton area and requested further information to demonstrate that future connections to a district heat network and the feasibility of the incorporation of Solar PV within the scheme has been explored.

Transport

- 2.8. Below is a summary of the comments received from Officers on 28th May 2020 about Transport matters: -
- The building line should be set back to provide a much more generous public square, to accommodate the expected peak time levels of activity associated with the development and the future uses of the public space. More of the adjacent arches should also be opened up as part of the development, to

provide new routes through and within the site, to ensure the wider public benefits are achieved.

- 2 disabled parking spaces rather than 1 are required on-street on Brixton Station Road for the retail and office elements of the scheme.
- Insufficient visitor cycle parking is provided to meet the needs of the proposed development. Setting back the building line as discussed would allow additional short-stay cycle parking to be accommodated within the local public realm. Contributions towards wider town centre visitor cycle parking would also help to mitigate the shortfall.
- The trip generation analysis currently undertaken does not include any assessment of additional activity associated with A1 / A3 and D1 / D2 uses.
- The current proposed servicing is inadequate and relies on the public highway for servicing of all market units. The development should make use of freight consolidation to reduce the number of servicing trips, so that the Valentia Place service yard can accommodate all servicing associated with the development.

3. THE REVISED SCHEME

- 3.1 Following the submission of the planning application and following receipt of the comments/consultation responses broadly summarised in Section 2 of this document, the scheme is now proposed to be revised.

Proposed Scheme Revisions

Building Setback

- 3.2 Further to comments received from LBL, in addition to comments from various key stakeholders, the proposed building siting has been revised to allow for a more generous public realm on Pope's Road. The West Block of the proposed development has been moved east by 2.5m but maintains all its previous architectural features and detailing.
- 3.3 In order to provide this increased public realm on Pope's Road through a 2.5m building setback, the gap between the East and West blocks of the proposed development have been reduced and a connecting floor has been added at fourth floor between the two blocks.

Uses

- 3.4 The revised building siting results in a shrinkage of the floorplates of the building because of the tapering shape of the site. This in turn has caused a change in the overall floorspace figures. The proposed floorspace of the respective uses has been provided below:

Use	Proposed GIA (sqm including plant)
Retail/Restaurant	3,212*
Community Use	221
Office	25,435
Total	28,868

*This includes the 8th floor restaurant which has a proposed floorspace of 534 sqm GIA

Public Realm

- 3.5 The Revised Scheme continues to offer transformative improvements to the existing public realm provision on Pope's Road. Not only will the scheme be allowing for a

significantly increased public realm compared to that previously proposed, but the quality and breadth of the public realm offer has been further enhanced.

- 3.6 The Revised Scheme and its more expansive public realm will reinforce the role of Pope's Road as a focal point for civic activity including space for a wide variety of activities including increased flexibility for the local outdoor market traders.
- 3.7 In line with the objectives of the Site allocation, the proposed development will continue to facilitate the following key public realm improvements;
- Opportunities to improve the station entrance and station facilities;
 - Opening up of Pope's Road to provide a wider public space with the potential to provide improved and/or additional market spaces.
 - Facilitating the potential link into Brixton Village;
 - Designing the scheme such that if in the future the arches are opened up, there is the potential to create a North -South link across the Site, into Pop Brixton.
 - Provision of improved and/or additional market spaces.
- 3.8 The improvements to and re-provision of the public toilets remain a core public benefit of the Revised Scheme. These toilets will remain free of charge under the Revised Scheme and there has been no change to their proposed location. The public toilets will be made suitable for all users including disabled people, families with young children and people of all gender identities with a number of changing facilities also available for use.

Community Use

- 3.9 The central space for community use will remain within the Revised Scheme, but the Revised Scheme also now incorporates a dedicated D-Class community space on the 1st floor of the building (exact location to be agreed). This space is intended to be open and available to all members of the Brixton community and will be able to accommodate a wide variety of activities such as workshops, business mentoring, training and clubs.
- 3.10 In order to ensure this space is best utilised by the local community, the Applicant have commissioned The Brixton Project to develop in conjunction with the Applicant an actionable strategy for local engagement, participation and programming; working with a range of community partners, including Impact Brixton. They will also advise on how to integrate the community into the economic development of the markets. Ensuring this space is part of the affordable workspace offering, will deliver constant activity and ancillary use by Impact Brixton and their members, who will also promote and curate activities within this space. Brixton Project are a renowned locally inspired

placemaking organisation, who aim to embed businesses, creative networks and the local community at the centre of Brixton's development. They will draft a strategy for this community space and are also exploring further partnership opportunities within the current covered Markets, that support and promote the development of key stakeholder communities – businesses and local residents.

Transport

- 3.11 The scheme remains to be car-free with the exception of two disabled parking spaces to be provided through financial contributions secured via a Section 106 agreement. The number of disabled parking spaces has been increased in response to LBL Officer comments from one disabled parking space in the original scheme. Any financial contribution for these two disabled parking spaces will allow for Electric Vehicle charging capabilities.
- 3.12 There are no proposed changes to the building access points, with the main pedestrian access to the building remaining on Pope's Road and the main vehicular access point to the building still located via the service yard on Valentia Place.
- 3.13 The original planning application proposals were to provide long-stay cycle parking in-line with draft New London Plan standards, however, based on the feedback received from LBL, the design of the cycle storage has been reworked, providing more focus on accessible cycle parking and reducing the number of bicycle lockers.
- 3.14 Table 2.2 below summarises the change in long-stay cycle parking provision between the original and Revised Scheme. the proposed changes to the cycle storage now provide an additional 15 Sheffield stands, with the layout also now enabling 29 of the Sheffield stand spaces to be utilised by accessible or non-standard bicycles. Additionally, the proposals now reduce the number of two-tier stands and bicycle lockers in response to LBL comments.

Table 2.2: Original and Revised Long-stay Cycle Parking Provision			
Type	Original Scheme	Revised Scheme	Change in Provision
Sheffield Stand	32	47	+15
Two-Tier	259	236	-23
Bicycle Lockers	90	39	-51
Total	381	322	-59

- 3.15 It is acknowledged that the proposed short-stay cycle parking provision (30 spaces) falls short of draft New London Plan standards. This shortfall in cycle parking is a result of the constraints of the development and limited opportunities to provide cycle

parking externally without materially impacting the flow of pedestrians and cyclists through the public realm and along Pope's Road.

- 3.16 To supplement the short-stay cycle parking provision within the development, The Civic Square Concept Design for Pope's Road (prepared by Gort Scott and appended to this addendum submission) indicates that there is the opportunity to provide additional cycle parking in the new public square on Pope's Road. The Applicant is also willing to commit to future monitoring of cycle parking as set out in more detail in the Transport Assessment Addendum.

Energy & Sustainability

- 3.17 Further to comments received from LBL's Energy and Sustainability Officers and subsequent discussions with the Borough, a series of additional measures have been agreed which are geared towards maximising the scheme's sustainability wherever possible.
- 3.18 In response to officer's comments that the original scheme did not meet the required 35% reduction in CO2 emissions on site, an Energy and Sustainability Statement Addendum has been submitted in support of this application to demonstrate that the Applicant is committed to meeting the 35% reduction on site and provide a final energy strategy that includes future proofing the building for potential connection to an energy network should one become available. The Applicant will undertake to reach this target during the later RIBA stages, having regard to items such as photovoltaics, the scheme's roof area and plant efficiencies.
- 3.19 As detailed in the Energy Statement of Conformity appended to this Addendum submission, Hurley Palmer Flatt have carried out a qualitative assessment of the scheme amendments and concluded that the revised scheme will not materially alter the conclusions of the originally submitted Energy Statement.
- 3.20 Regarding sustainability, a Statement of Conformity has been submitted alongside the revised scheme documents. This Statement makes clear that the scheme revisions will not materially alter the conclusions of the originally submitted Sustainability Statement.

4 PLANNING POLICY ASSESSMENT

- 4.1 A full assessment of the originally submitted application proposals in relation to relevant national, regional and local planning policy has been provided within the previously submitted Planning Statement (dated April 2020). Given the nature of the amendments proposed within the Revised Scheme, most of planning considerations within the previously submitted Planning Statement are still relevant to the Revised Scheme. In policy terms, there has also been no change to the relevant policies within Lambeth's draft Local Plan since its submission for examination on 22nd May 2020. However, the following further planning considerations are highlighted:

Land Use

- 4.2 As noted in Section 2 of this Statement, the new 2.5m setback proposed as part of this Revised Scheme has implications for the floorspace of each use within the proposed building. The revised floorspace figures compared with the floorspace proposed in the original submission can found in the table below:

Use	Original Scheme GIA (sqm)	Revised Scheme (sqm)
Office	25,445	25,435
Retail/Restaurant/Community Use	3,557	3,433*
Total	29,002	28,868

*This includes the 8th floor restaurant which has a proposed floorspace of 534 sqm GIA and the dedicated community space which has a proposed floorspace of 221 sqm GIA

- 4.3 Given there are no new uses proposed and the variation in retail and community floorspace is minimal, it is considered the proposed development remains in conformity with the Lambeth local Plan and the Lambeth Local Plan Site Allocation 16 for 20-24 Pope's Road.
- 4.4 The Applicant is still seeking maximum flexibility to ensure that the ground and first floor can cater for tenant and market demand. In accordance with permitted development rights, the Applicant is proposing flexibility of these uses across the ground and first floor for a period of 10 years. It is envisaged that this will be secured through condition and/or the Section 106 Agreement should permission be granted.

- 4.5 Whilst the maximum flexibility is proposed, the Applicant envisages that the ground floor will largely be used as A1/A3 similar to the mix of the current indoor markets at Brixton Village and Market Row and the first floor will be used primarily for the B1 and D1/D2 uses with only a small proportion of uses being attributed to A1/A3.
- 4.6 The Revised Scheme includes a space dedicated to community use of 221 sqm GIA (refer to para 3.9). Policy S2 of the Draft Local Plan states that new community uses will be supported where they are accessible to the community, cause no disturbance or harm to amenities of the area and are designed to maximise shared community use where practical. The dedicated community space proposed as part of this scheme has been designed to be flexible, adaptable and to promote social inclusion, all of which accord with the aims and objectives set out within Lambeth's draft Local Plan.
- 4.7 In addition to this, the Applicant has prepared a dedicated Community Use brief which has been provided to LBL as part of this Revised Scheme submission. The brief itself will be used as an actionable strategy to ensure the space is designed, managed and used in a way that maximises and prioritises community engagement. The brief has been developed through collaboration with local enterprises and workshops held with members of the community in August 2019. This brief will help convert the aspirations for the space into a reality for the community, with a curated programme of events, creative initiatives and partnership opportunities led by local enterprises such as The Brixton Project and Impact Brixton. For further detail on the dedicated community use, please refer to the Community and Commercial Use Strategy submitted to support the Revised Scheme.
- 4.8 The development continues to make the most effective and efficient use of the site possible and continues to deliver much needed office floorspace to bring investment to the local area and meet the local need demonstrated with the Economic Impact Assessment (for which an Addendum has been submitted with this application).
- 4.9 As part of the office use proposed, the Applicant aims to provide 10% NIA of this office floorspace as Affordable Workspace in line with draft Local Plan Policy ED2. This space has been designed flexibly to accommodate different scales and types of business and facilitate their growth. The aspiration is to for Hondo Enterprises in conjunction with Impact Brixton, will manage and operate the affordable workspace within the proposed development. Impact Brixton is a place to call home for a diverse community of entrepreneurs, freelancers, dreamers, creators and social change makers in South London. Launched in 2014 as a community workspace for mission-led organisations, it has since become a home for community-led change, with projects such as the People's Fridge and Open Project Night bringing together people and organisations of

all backgrounds. The Applicant is committed to working with prospective tenants to secure employment and skills opportunities within the employment space and will develop an Affordable Workspace Management Plan if this is secured by condition or a Section 106 obligation.

- 4.10 The Revised Scheme is considered to continue to achieve sustainable development since it meets all the key planning principles for redevelopment of the Site. The proposal continues to be a mixed-use re development of a brownfield Site located in a highly accessible location by public transport in London.
- 4.11 For the reasons outlined above, the principle of the proposed development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth. The proposed development is acceptable in principle and should be supported in this location.

Design Matters

- 4.12 A key design revision to the scheme comprises a significant increase in the public realm space on Pope's Road. The Applicant was able to achieve this by setting the building back by 2.5m on this façade. This revision was made in response to comments received from LBL and is considered to represent a significant improvement on the public realm offering of the scheme. This now extensive public space will support a range of uses that would help create a multi-functional, inclusive and dynamic public realm that celebrates Brixton's physical and social character. The space is well-proportioned to the use and scale of the proposed scheme and will provide a key civic space within a key town centre location. This enlarged and revitalised space on Pope's Road would also provide a space for the area's market pitches to be accommodated whilst still allowing enough space for members of the public to shop and move between market stalls or towards Brixton Station with ease. The provision of street trees, soft landscaping and urban greening in this enlarged public realm will also promote biodiversity and create a more pleasant, healthier and safer space for local people and visitors alike.
- 4.13 In order to create this increased public space, the gap between the eastern and western blocks of the building has been reduced and a connection linking the east and west buildings has been introduced at fourth floor. Notwithstanding this, the urban design principles which have informed the final design of the proposals remain, in particular,

- The creation of a new building of architectural distinction that will improve the quality of the immediate area and contribute to the architectural richness of Brixton
- The addition of a local landmark building which responds positively to the valued historic aspects of its context.
- Exceptional design quality shown through the materials and of an architectural expression that would complement the appearance of the Conservation Area;
- The provision of a highly permeable and active ground floor which works with the public realm proposals to transform the Site and its immediate surroundings in terms of permeability, legibility and the quality of the pedestrian environment.

4.14 The impact of these minor amendments to the scheme's design and massing have been tested within key views in the supporting Townscape and Visual Impact Assessment Addendum which considers the potential impact of the scheme on surrounding heritage assets, including listed buildings and conservation areas. The Addendum concludes that the amendments will not result in any noticeable or harmful change to any significant views.

Heritage & Townscape

4.15 It is understood that there is a statutory duty to protect conservation areas. Section 66 (1) of the Listed Buildings and Conservation Areas Act of 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

4.16 The NPPF paragraph 190 outlines that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. Paragraph 196 goes on to state that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

4.17 Historic England objected to the submitted application "*on the basis of the harm they would cause to the significance of the Brixton Conservation Area through development*

within its setting" (18 May 2020). This would be perceived harm to the setting of the Brixton Conservation Area as the site lies outside the conservation area. HE also found a lesser degree of harm to the setting of Church of St Matthew (Grade II* Listed). Under the terms of the NPPF, Historic England confirm that that the harm is 'less than substantial.

4.18 We acknowledge and have carefully considered Historic England's comments. The Applicant has carried out its own review and concludes that the proposed development does not cause harm to the setting of the Brixton Conservation Area. The THVIA has been prepared by the Professor Robert Tavernor Consultancy and assesses the Development against planning policy in respect of townscape and heritage assets. Within the report it concludes that "*there would be no impact on any strategically protected views*". The proposed tall building would be visible in some key local views, one of which is designated in local policy (views north from Brockwell Park) and others of which are identified in the Brixton Conservation Area Appraisal (views north on Brixton Hill and east on Acre Lane), and it would be seen in relation to a number of listed and locally listed buildings within central Brixton. However, this will not result in any harm to their significance. It would not erode the silhouette of the landmark aspects (i.e. towers) of listed buildings on the skyline. It would be noticeably taller than existing heritage assets in Brixton, but this fact in and of itself would not be harmful to them: other tall buildings exist locally and the proposed tall building has been designed to be a new local landmark of the highest architectural quality and to relate positively to the local townscape and the heritage assets within it through the particular character and quality of its design."

4.19 Where there is an absence of harm planning policy does not require any justification to be provided for the development's relationship with designated heritage assets. Notwithstanding this, were the Council to take a different view, it is considered that any harm would at most be less than substantial and that the relevant paragraph of the NPPF to consider in the determination of the proposals would be paragraph 196. As outlined above, paragraph 196 of the NPPF identifies:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use"

4.20 The Planning Practice Guidance gives advice on what 'public benefits', means in this context. Such public benefits could be anything that delivers economic, social or environmental progress and should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit (18a-020-20140306, paragraph

020). In this context, any harm, which would only be less than substantial harm, would be significantly outweighed by the resulting public benefits including;

- A **building of outstanding architectural quality** designed by an internationally acclaimed architects which will set a benchmark for further developments;
- The **delivery of a mixed of retail, office and leisure development** to complement Brixton Town Centre and LBL regeneration objectives
- Promotion of economic growth across Brixton Town Centre by **providing a new office floorspace ecosystem** in an area where there is an identified lack of supply and competitiveness with other locations
- Contribute to **securing greater provision of office space suitable for SMEs**, aid in meeting Lambeth's requirement for affordable workspace, and attract domestic and international visitors to the local area – all of which stimulate the local economy.
- Delivering **440 jobs** annually on-Site across the 3.3-year construction period, equivalent to c. 145 Full Time Equivalent (FTE) jobs across the entire period. **Construction workers are expected to support spending of £2.3m in the local area** over the course of the construction period, equivalent to £695,000 per year.
- **Creating c.1,600 gross FTEs creating an uplift in employment of 1,550 FTEs or 1,800 jobs over what existing currently**
- Contributing at least **£2.4m in annual business rate payments**, equivalent to an uplift of at least £2.3m annually.
- Using reasonable endeavours to achieve the following further objectives:
 - The recruitment of 29 apprenticeships over the overall construction and operational phase of the Development;
 - The recruitment of 12 opportunities for the long-term unemployed in the operational phase of the Development; and
 - Sector-specific under-represented priority groups or groups suffering disproportionately from unemployment to be identified in the agreement are targeted for appropriate job vacancies arising from the Development.
- Providing **10% of the B1 floorspace as affordable workspace** at 50% reduced rates for a period of 25 years in partnership with Impact Brixton.
- Provision of a **dedicated community space**. This space will be integrated within, (but additional to) the affordable workspace offer, and will be **managed by community representatives (The Brixton Project)** to curate a community led programme of events, activities, and creative initiatives.
- Provision of a **publicly accessible central space** within the market which can be used free of charge by the community to host events.

- A significant increase in the amount of useable **public space** available to Brixton residents and visitors on Pope's Road whilst also transforming the space to allow for a wide variety of public activities to take place here.
- Provision of **new and expanded public toilets** within the development replacing the existing substandard block in Popes Road. This facility would be made free of charge and the existing toilets would then be demolished to provide a more spacious public realm whilst significantly improving the quality and quantity of the public toilet provision.
- **Increased permeability and stitching together wider public realm** improvements in the Town Centre and the building has been designed in line with LBL's aspirations to further increase permeability through the Site to allow for the opening of the existing arches in the future.
- Delivery of **new public space opposite Pope's Road** to help facilitate future station improvements.
- Incorporate sustainability measures and seek to achieve **BREEAM excellent and net zero carbon**.
- Commitment to **50% freight consolidation** with cap on servicing trips
- Deliver significant contributions in **CIL and Section 106 payments**, which would be highly beneficial in improving local infrastructure.

4.21 In light of the above, it is considered that alongside the quality of the architecture proposed and the other public benefits of the scheme, the building decisively outweighs any perceived harmful impacts and is therefore acceptable in planning policy terms at national, regional and local level.

Public Realm

4.22 The additional public realm offered by the Revised Scheme provides significant enhancements and continues to accord with Local Plan Policy Q6 which states that the Council will support development that provides a co-ordinated public realm that enhances the scheme's setting, improves permeability, provides new and enhanced open space and improves pedestrian and cycle-priority environments.

4.23 In providing a public space that is significantly larger than the original scheme's proposal, the Applicant has demonstrated their commitment to regenerating this part of Brixton Town Centre and reinforcing the role of this site as a focal point for civic activity. The Applicant is currently working with Gort Scott Architects who focus on providing innovative design solutions that put positive, imaginative and community led contributions at the heart. The Applicant has commissioned Gort Scott to develop a Public Realm and Arts Strategy for the proposed public realm adjacent to Pope's

Road. The illustrative proposal aims to demonstrate the potential of the Pope's Road space to:

- Provide a new civic square
- Facilitate the potential for an additional future station exit and entrance, onto Pope's Road
- The ability for accommodate pedestrian desire lines, both present and future
- Accommodate the exiting street market provision, with potential for future increase in capacity
- Provide for a variety of public activities
- Opportunities for greenery and planting
- Indication of opportunities for street furniture and public Art
- Indication of opportunities for new street lighting
- Protecting access for emergency services
- Contribute to visitor cycle provision

4.24 The Public Realm and Art Strategy has been submitted with this addendum and will be developed further in consultation with LBL and relevant local stakeholders prior to the construction of the site (if planning permission is granted). The goal of the illustrative proposal is to use the re-development of the site as a way of realising the social potential of Pope's Road as a key civic space within the town centre.

4.25 The Revised Scheme, in line with Local Plan policies, will provide safe, attractive, uncluttered, co-ordinated public realm that enhances the setting of and spaces between buildings (Q6); provide new or enhanced public open space (Q6); have a siting, building line and orientation which adequately preserves or enhances the prevailing local character (Q7); and will make a positive contribution to public realm and townscape including at street level (Q26).

4.26 Full details of the public realm strategy that forms an essential part of the Revised Scheme proposal can be found within the Public Realm and Art Strategy document appended to this application.

Energy and Sustainability

4.27 The Energy and Sustainability Statements of Conformity submitted alongside the revised scheme Addendum documents make clear that the amendments to the proposal are not considered to materially affect the conclusions of the originally submitted report.

4.28 Notwithstanding, the Applicant recognises the need and importance of meeting the 35% regulated carbon emissions reduction target, and during the course of further detailed design will undertake to reach this target and ensure the scheme is compliant

with draft London Plan Policy SI2 which requires all new major development to be net zero-carbon with a minimum on-site reduction of at least 35 % beyond Building Regulations.

- 4.29 The Applicant has agreed to the meeting of this target being secured by condition and during detailed design stages will explore all possible measures and efficiencies with regards to the scheme's energy strategy.

Other relevant considerations

- 4.30 The following further relevant considerations are also highlighted:
- *Wind:* An updated Wind Assessment has been submitted in relation to the Revised Scheme, which details the findings of the surveys undertaken to date, in addition to recommendations concerning a series of mitigation measures which should be incorporated during construction phases. Overall, the Wind Assessment Addendum confirms that the Revised Scheme, with the recommended measures in place, will be policy compliant with no significant residual effects. As such, the Revised Scheme is considered to accord with LBL Local Plan Policy D8 and standards within the emerging Draft London Plan.
 - *Daylight and Sunlight:* A revised Daylight and Sunlight Assessment has been undertaken and submitted in accordance with the Revised Scheme. The report confirms that the Revised Scheme will not materially alter the conclusions of the previous daylight and sunlight report. The document confirms that the Revised Scheme will achieve a good level of compliance with BRE guidance in relation to daylight amenity. Overall, the Addendum demonstrates that no unacceptable harm is caused to surrounding residential properties and that daylight and sunlight impacts are commensurate for the surrounding urban context. As such, the proposals are considered to ensure that local residential amenity is preserved, and therefore accord with LBL Local Plan Policy D4 and D8. In terms of overshadowing, the Addendum also shows that upon successful implementation of the Proposed Scheme, all open spaces assessed either retain levels of sun hours on ground that meet or exceed the BRE recommendation or experience alterations less than 20% and are therefore in line with BRE guidelines.
 - *Economic Impact:* A Statement of Conformity for both the Economic Impact Assessment and Employment and Skills Plan have been provided to the Council in support of this Revised Scheme submission. Both documents conclude that the Revised Scheme will not alter the conclusions of the submitted Economic Impact Assessment of Employment and Skills Plan. The Revised Scheme will continue to deliver on the increased footfall, job creation and economic uplift

promised by the submitted scheme and will therefore continue to comply with Draft Local Plan Policy ED1.

5 PLANNING BENEFITS

- 5.1 The proposed development will result in a significant number of economic, social and environmental benefits, including:

Employment & Skills

- 5.2 The proposed development will deliver a mix of retail, office and leisure uses to complement Brixton Town Centre and LBL regeneration objectives.
- 5.3 The development promotes economic growth across Brixton Town Centre by providing a new office floorspace ecosystem in an area where there is an identified lack of supply and competitiveness with other locations. The proposed retail uses and office floorspace will integrate together to create a wider ecosystem for the local public and the office users.
- 5.4 The proposed development comprises flexible retail floorspace providing activation at ground floor level. The aspiration is to maintain a high level of flexibility with a range of small to medium units. The design of the proposed market has been inspired by the current aesthetic and style of the existing markets, designed to extend and preserve the character and authenticity that has made the existing markets so popular over the years. A significant benefit of having office accommodation above the market space is that the office users can use and dwell in this space facilitating extra footfall and further increase the expenditure in the local area.
- 5.5 The development will contribute to securing greater provision of office space suitable for SMEs, aid in meeting the Borough's requirement for affordable workspace, and attract domestic and international visitors to the local area – all of which stimulate the local economy.
- 5.6 In addition to the workspace specifically targeting local businesses in the creative industry, the workspace will be designed as business 'incubator' operations, which will be flexible and hence able to accommodate small businesses of different sizes, allowing local businesses to develop and flourish within LBL
- 5.7 The development would provide a significant uplift of economic activity in one of the most economically deprived locations within LBL. The construction phase of the development would generate 440 jobs annually on-Site across the 3.3-year construction period, equivalent to c. 145 Full Time Equivalent (FTE) jobs across the entire period. Construction workers are expected to support spending of £2.3m in the local area over the course of the construction period, equivalent to £695,000 per year.

- 5.8 The jobs provided at the proposed development will be split between those supported by office space, those supported by retail space, those supplied through the provision of a restaurant, and jobs created by the D space. The proposed development is expected to accommodate c.1,600 gross FTEs, split more specifically by 1,475 office workers, 105 retail workers, 20 restaurant workers, and 10 leisure workers.
- 5.9 In contrast, the existing Site – which comprises of solely retail (A1) class floorspace, supports a total of 35 FTEs, equivalent to 50 jobs. This means the proposed development would create an uplift in employment of 1,550 FTEs or 1,800 jobs. This equates to a 3,600% increase compared to the jobs currently supported on-Site. The workers are expected to spend an estimated £2.9m in the local area each year, of which £2.8m will be additional to the spending currently supported by the existing workers on Site.
- 5.10 Applying the average rateable value per sqm of office floorspace in the surrounding area, as well as an estimated rateable value for retail/restaurant space based on similar hotels in the local area, it is estimated that the proposed development will pay a total of at least £2.4m in annual business rate payments, equivalent to an uplift of at least £2.3m annually.
- 5.11 The Applicant has committed to using reasonable endeavours to achieve the following
- The recruitment of 29 apprenticeships over the overall construction and operational phase of the Development;
 - The recruitment of 12 opportunities for the long-term unemployed in the operational phase of the Development; and
 - Sector-specific under-represented priority groups or groups suffering disproportionately from unemployment to be identified in the agreement are targeted for appropriate job vacancies arising from the Development.
- 5.12 The Applicant is proposing 10% NIA of the B1 floorspace to be provided as affordable workspace at 50% of market rents for a period of 25 years. The Applicant in conjunction with Impact Brixton, will manage and operate the affordable workspace within the proposed development. Education and training programmes provided at Impact Brixton on-site will strengthen the skills of local communities and local businesses, as well as providing affordable workspace in a co-working environment. Impact Brixton is a place to call home for a diverse community of entrepreneurs, freelancers, dreamers, creators and social change makers in South London. Launched in 2014 as a community workspace for mission-led organisations, it has since become a home for community-led change, with projects such as the People's Fridge and Open Project Night bringing together people and organisations of all backgrounds.

- 5.13 All full-time operational staff directly employed by the Applicant will be paid the London Living Wage and the London Living Wage will be promoted for all construction and operational employees that are not directly employed by the Applicant but are working at the site.
- 5.14 The scheme will provide a package of Section 106 and CIL contributions in addition to other S106 benefits already mentioned.

Design and Public Realm

- 5.15 The Site sits within the Centre of Brixton; yet at present the existing building fails to respond to its prominent location, projecting a underdeveloped, tired and dated image. The proposed development will ensure the building projects a positive and high-quality image in this strategic location, setting the benchmark for regeneration elsewhere the area.
- 5.16 The proposed development has been designed to create and facilitate areas of significant public realm in and around Pope's Road, including neighbouring land in ownership of LBL assisting station capacity relief and delivering more choice for movement through the Site and surrounding area.
- 5.17 Delivery of a Public Realm and Arts Strategy for the proposed public realm adjacent to Pope's Road. The illustrative proposals aims to demonstrate the potential of the Pope's Road space to provide a new civic square and to facilitate the potential for an additional future station exit and entrance, onto Pope's Road.
- 5.18 The development will play a key role in terms of increased permeability and stitching together wider public realm improvements in the Town Centre and the building has been designed in line with LBL's aspirations to further increase permeability through the Site to allow for the opening of the existing arches in the future.
- 5.19 The proposed development includes a publicly accessible central space within the market which can be used free of charge by the community to host events.
- 5.20 Provision of new and expanded public toilets within the development replacing the existing substandard block in Popes Road. This facility would be made free of charge and the existing toilets would then be demolished to provide a more spacious public realm whilst significantly improving the quality and quantity of the public toilet provision.

- 5.21 Provision of a dedicated community space. This space will be integrated within, (but additional to) the affordable workspace offer, and will be managed by community representatives (The Brixton Project) to curate a community led programme of events, activities, and creative initiatives.

Sustainability

- 5.22 The proposed development will incorporate sustainability measures and seek to achieve BREEAM excellent and net zero carbon.
- 5.23 Where applicable to ensure that the potential for reusing and recycling the materials currently on Site will be maximised where practical. Materials will be chosen that have a minimal environmental impact, are from sustainable or recycled sources and, where feasible, are locally sourced to reduce transportation impacts.
- 5.24 Provision of a Delivery and Servicing Management Plan including mechanism to monitor 50% freight consolidation with cap on servicing trips (half the predicted number within the revised Transport Assessment to be submitted).

6 PLANNING OBLIGATIONS

Draft heads of terms for a section 106 agreement

6.1 It is envisaged that the following planning obligations will be necessary to make the development acceptable in planning terms, subject to on-going discussion with the Local Planning Authority:

- Employment and Skills
 - Employment and skills plan
 - Employment and training contribution
 - Provision of 10% affordable workspace
 - Workspace Strategy
- Public Realm and Community
 - Public Realm Design Scheme (PRDS) for Pope's Road
- Community & Commercial Use Strategy and Management Plan
- Construction Logistics Plan
- Public Art Strategy and contribution
- Transport and Highways
 - Legible London signage contribution
 - s278 agreement for off-site highways works
 - Delivery and Servicing Management Plan
 - Travel plan and monitoring fee for all non-residential uses
 - New cycle hire docking station contribution and cycle hire membership for 10% of the expected employee numbers
 - Provision of two new disabled bays on Brixton Station Road and installation of rapid charge points with contribution of £20,000 (2 x £10,000) and £12,000 (2 x £6000 per EV charge point) for implementation secured
 - Disabled parking monitoring and review mechanism;
 - Installation of additional visitor cycle parking in the wider town centre contribution
- Energy, Sustainability and Microclimate
 - Final Energy Strategy for future energy network connection and to identify value of any carbon off-setting contribution
- Monitoring

7 CONCLUSION

- 7.1. The scheme has been amended to respond to the comments raised during the recent consultation period concerning the submitted application.
- 7.2. The proposed development accords with the NPPF and represents sustainable development which accords with the development Plan. The design process for the scheme has taken into account the full range of stakeholder views.
- 7.3. Following submission of the planning application in April 2020, a series of comments were received from LBL and other relevant consultees and stakeholders concerning the proposed scheme. These comments notably raised concerns over the proposed siting of the new building, and the impact the building line would have on the public realm adjacent to Pope's Road. In light of these comments, the Applicant is now proposing to revise the proposed development and set back the building line 2.5 metres east. The proposed set back of the building and enhanced public realm offering is considered to suitably address comments received from LBL and the relevant consultees.
- 7.4. Not only have the public benefits of the scheme been significantly enhanced through the increased public realm offering and dedicated community use, but the public realm on Pope's Road has now been developed through a Public Realm and Arts Strategy in order to create a wider strategy for the Pope's Road area that ties in with local and Borough level aspirations for the central Brixton site.
- 7.5. The Site-specific planning policy requirements set out within Lambeth's Local Plan, taken alongside the objectives for Brixton contained within the Local Plan and the London Plan, are fully met by the proposals. In particular, the scheme delivers a new building of the highest architectural quality which will create a landmark for Brixton and contribute positively to the skyline of London. Substantial economic benefits and a transformative scheme of public realm improvements flow from the development. These requirements are the primary focus of planning policy guidance for the Site.
- 7.6. Overall, the Revised Scheme will result in the redevelopment of an underutilised brownfield site, replacing it with a high-quality office-led scheme with affordable workspace, dedicated community space, a vibrant retail offering and significantly enhanced public realm. The proposed development is considered to respond positively to the surrounding context and will help deliver significant new jobs and affordable workspace within the local area. Given these circumstances, it is considered that the Revised Scheme addresses key comments received during the original application's consultation period and should therefore be supported.

- 7.7. It is considered that if the council considers that the proposals do cause heritage harm then that any harm can only be less substantial. The applicant has therefore considered and weighed up any harm against the benefits offered by the proposals. It concludes that alongside the quality of the architecture proposed and the other public benefits of the scheme, the building decisively outweighs any perceived harmful impacts and is therefore acceptable in planning policy terms at national, regional and local level.