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1. INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of AG Hondo Pope's Road BV ('the Applicant') in support of an application for full planning permission for the development 20-24a Pope's Road, Brixton, SW9 8JB ('the Site'), within the London Borough of Lambeth (LBL).

1.2 The proposed description of development is set out below:

“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.”

1.3 The scheme is a joint venture by AG Hondo Pope's Road BV who have an agreement to purchase the Site, currently occupied by Sports Direct and Flannels. Hondo is part of a property development company who have a longstanding presence in the borough having purchased Market Row and Brixton Village in March 2018 with the intention of securing the markets unique character in the long term and enhancing the markets for the benefit of shoppers, traders, visitors and the local community. To date, Hondo have made significant improvement to the operation and management of the markets together with various community initiatives. Hondo is well placed to develop the neighbouring Pope's Road Site.

1.4 This proposed development will improve permeability in Brixton, boost the local economy through the creation of a workspace eco-system and create new active uses within the town centre. It is estimated that the proposals could lead to £2,300,000 being injected into the local economy over the construction phase alone, benefiting both local traders and smaller businesses across the central Brixton area.

1.5 This statement has been prepared by DP9 Ltd and provides the planning case in support of the development. It assesses the planning considerations associated with the scheme and considers the development in the context of national, regional and local planning policy and guidance. This statement should be read in conjunction with the supporting Design and Access Statement.

1.6 This planning statement sets out the planning assessment of the proposed development. It assesses the scheme in the context of national, regional and local planning policy and guidance. This Planning Statement is structured as follows:

- Section 2 – Site Description, Designations and Planning History

- Section 3 – Pre-Application Engagement
- Section 4 – Application Proposal
- Section 5 – Planning Policy Framework
- Section 6 – Planning Assessment
- Section 7 – Public Benefits
- Section 8 – Conclusions

1.7 This Statement should be read in conjunction with the plans and drawings, as well as the following documents which are all submitted in support of this application. These documents comprise the following:

- Signed and dated planning application form;
- Site Location Plan, prepared by Adjaye Associates,
- Design and Access Statement, prepared by Adjaye Associates,
- Existing and Proposed Drawings, prepared by Adjaye Associates,
- Daylight and Sunlight Report, prepared by GIA,
- Solar Glare Study prepared by GIA,
- Townscape & Heritage Assessment, prepared by Robert Tavernor,
- Transport Assessment, prepared by Caneparo Associates,
- Travel Plan, prepared by Caneparo Associates
- Delivery & Waste Management Plan, prepared by Caneparo Associates,
- Construction Logistics Plan, prepared by Caneparo Associates,
- Statement of Community Involvement, prepared by Lowick,
- Energy Statement, prepared by HPF
- Sustainability Statement, prepared by HPF,
- Air Quality Assessment, prepared by Trium,
- Urban Baseline & Design Assessment, prepared by Space Syntax,
- Flood Risk Assessment, prepared by AKT II,
- Drainage Assessment, prepared by AKT II,
- Basement Impact Assessment, prepared by AKT II,
- Ecological Appraisal, prepared by Trium,
- Wind Assessment, prepared by Trium,
- Archaeology Assessment, prepared by Trium,
- Noise & Vibration Report, prepared by Sandy Brown,
- Construction Report, prepared by Blue Sky Building,
- Parametric Study, prepared by Hurley Palmer Flatt,
- Economic Impact Assessment, prepared by Volterra,
- Employment & Skills Plan, prepared by Volterra
- Land Contamination Assessment, prepared by Trium,
- Ventilation & Extract Statement, prepared by Hurley Palmer Flatt,

- 1.8 The submission of this planning application represents the culmination of an extensive pre-application consultation and engagement process, informed by a wide range of stakeholders including the local authority, statutory bodies, local interest groups and members of the public. The applicant has taken an exemplary approach to engagement, as required by the relevant legislation, policy and guidance such as the National Planning Policy Framework (NPPF, February 2019) and the Localism Act 2011.
- 1.9 The NPPF highlights the importance of pre-application engagement and frontloading in the planning process, to assist decision making. Paragraph 39 states that *“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community”*.
- 1.10 Engagement has covered a wide range of topics including land use principles, access, servicing, appearance, environmental matters and the relationship of the proposed development to its local and wider context. A full and detailed description of the pre-application consultation process that has been undertaken is contained within the Statement of Community Involvement (SCI).

2. DESCRIPTION, DESIGNATIONS AND PLANNING HISTORY

- 2.1. The application Site comprises a funnel shaped parcel of land situated between two large Victorian railway viaducts. It is positioned between both Brixton Station Road and Atlantic Road, the two main artery roads that run from the East to West towards Brixton Road and the high street. To the North on Brixton Station Road, Pop Brixton, a pop-up container park of food and drink outlets and Grade II listed Recreation Centre are both within the Site's locality. The Grade II listed Brixton Market village is also accessible via Atlantic Road. The junction from North to South Pope's Road meets with the notable Electric Avenue lined with street markets.
- 2.2. The Site is also adjacent to the Brixton Network Railway that comprises two elevated overground lines that span the length of the viaducts beneath with a third elevated line to the south of the site. Pope's Road is also covered by a railway underpass the width of the above main line. There is a varied mix of terraced house configurations with activated independent shop frontages and associated commercial units and market stalls. A great proportion of the Site and the surrounding area is allocated to various independent trade and street vendors. A single-storey wood building is located next to the Site and houses poorly maintained public toilet facilities.
- 2.3. The Site comprises a single storey building currently in use as two retail stores, and the prevailing height of the surroundings buildings is 2-5 storeys to the North, West and South, rising to 8-storeys to the East.



Surrounding Area

- 2.4. In the wider context the Site is within the Brixton town centre boundary, which is identified as a major town centre in the adopted and emerging London Plan. The Site is not within a Conservation Area but sits on the boundary of the Brixton and

Loughborough Park Conservation Area to the east, south and west. The Site is also a Strategic Area for Regeneration and identified as a Creative Enterprise Zone in the draft Local Plan (2020).

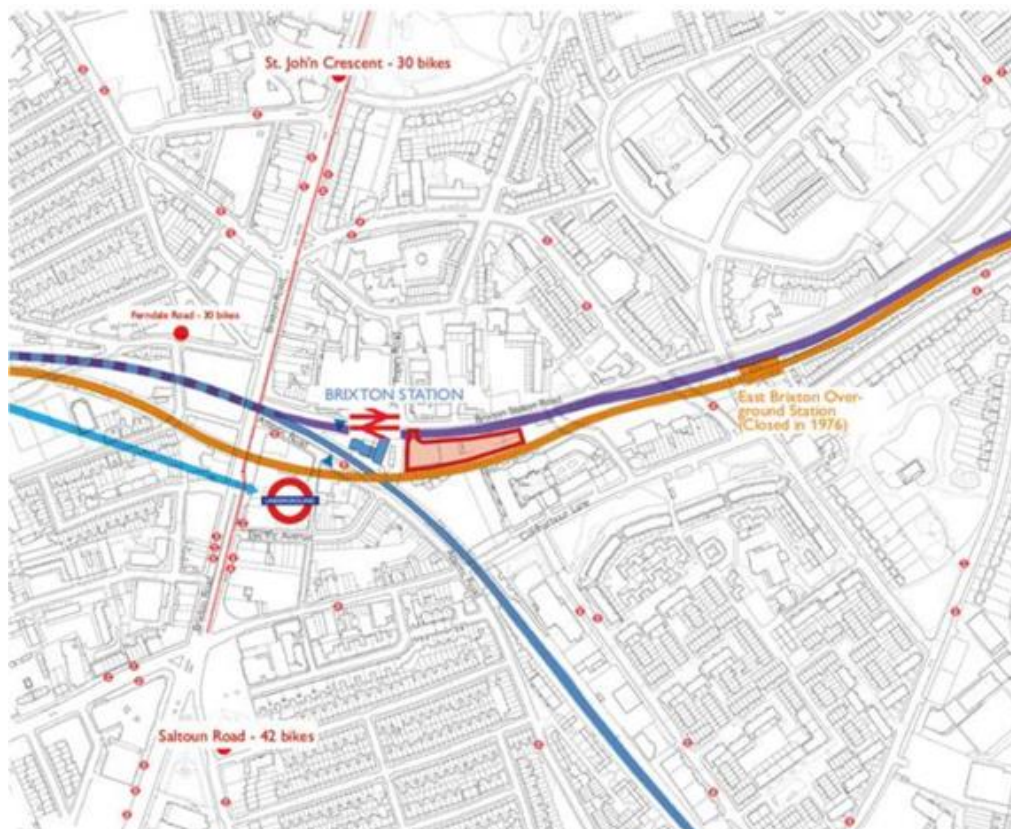
- 2.5. The local area is predominantly retail in use with the existing Brixton markets located in the surrounding area, alongside an eclectic mix of other commercial uses including numerous restaurants as well as residential properties especially to the east and south-east.

Policy Designation

- 2.6. The Site forms part of a wider Site identified in Lambeth's Local Plan (Site 16), allocated for mixed use development where the preferred uses are identified as commercial, retail, community, educational, leisure and recreational uses and a possible market extension. The Site allocation also identifies the Site as an opportunity to enhance pedestrian links and support improvements to Brixton Station.

Transport

- 2.7. The Site is accessible through a wide range of transport methods and benefits from a PTAL rating of 6b 'excellent'. The Site is served by 20 bus routes within PTAL walking distance alongside Brixton Station (London Underground and National Rail) and Loughborough Junction National Rail Station.



- 2.8. The closest section of the Transport for London Road Network is the A24 Brixton Road which is only 160m away. The proposed development is highly accessible by public transport modes, with numerous bus services available in the vicinity, as well as Brixton Rail Station, Brixton Underground Station and Loughborough Junction Rail Station all being within a close walking distance.
- 2.9. Brixton Tube station forms the southern terminus of the Victoria Line and provides high frequency connectivity to Central and other parts of Greater London including major London terminals such as Victoria, Euston and Kings Cross St Pancras and International Station.
- 2.10. Brixton Railway on Atlantic Road managed by London & South Eastern Railway Limited, is on the 3-mile Chatham main line route which operates every 15 minutes, running to and from London Victoria to Dover directions.
- 2.11. The area is also well served by a high number of 24-hour bus routes that run in multiple directions, stopping directly outside the tube station, over ground as well as Atlantic Road and Electric Avenue.
- 2.12. A cycle path runs directly through Brixton Road with the closest bike storage areas located from at St John's Crescent, to Ferndale Road and Saltoun Road.

Planning History

- 2.13. The planning history for the Site, including relevant permissions and refusals, is detailed below:

Address	Reference	Description	Decision	Date
22-24 Pope's Road	88/02091/PLANAP	Change of use from retail to use as a retail shop, commercial art gallery, with arts and crafts stalls, shop and ancillary facilities, and a jazz centre with recording studios, restaurant and ancillary facilities, together with elevational alterations	Grant	28/06/1989
20-24 Pope's Road	91/00317/PLANAP	Installation of internally illuminated shop fascia signs.	Grant	06/12/1991
Brixton Town Centre	96/02298/PLANAP	Installation of 8 Closed Circuit Television Cameras on buildings and 3 CCTV Cameras on railway	Grant	22/09/1996

		bridge abutment, sign post and lighting column, together with associated services cabinets.		
Ex Tesco Building and Roof Car Park	16/05825/FUL	Temporary change of use of the upper and lower roofs for a temporary period of up to three years. The upper roof will be used as a roof top food market involving the erection of timber framed food huts, provision of a bar, toilets and associated structures. The lower roof to be used for an office, staff cycle storage, waste/recycling and other storage facilities with associated fencing.	Grant	20/03/2017
Ex Tesco Building and Roof Car Park	17/02892/VOC	Variation of Condition 3 (operating hours) of planning permission 16/05825/FUL (Temporary change of use of the upper and lower roofs for a temporary period of up to three years. The upper roof will be used as a roof top food market involving the erection of timber framed food huts, provision of a bar, toilets and associated structures. The lower roof to be used for an office, staff cycle storage, waste/recycling and other storage facilities with associated fencing.)	Grant	20/03/2017
18-24 Pope's Road	18/02269/FUL	Shopfront alterations including installation of new glazing and cladding together with other external works including installation of new perimeter fencing, installation of bollards to Pope's Road and blocking up of 1 existing opening in the south elevation and 1 existing opening in the north elevation	Grant	06/09/2018
18-24 Pope's Road	18/02270/ADV	Display of 4 internally illuminated fascia signs and 1 internally illuminated above entrance sign	Grant	06/09/2018

18-24 Pope's Road	18/02272/FUL	Installation of roller shutters	Grant	06/09/2018
Ex Tesco Building and Roof Car Park	18/00820/ADV	Display of 4 internally illuminated fascia signs and 2 internally illuminated above-entrance signs.	Refuse	09/05/2018
Ex Tesco Building and Roof Car Park	19/04396/EIASCR	Request for a screening opinion in respect of an Environmental Impact Assessment with respect to the demolition of the existing structures on-Site and proposed construction of a development providing retail, office and hotel uses.	Not EIA development	27/01/2020

3. PRE-APPLICATION ENGAGEMENT

- 3.1. The proposed development represents the culmination of extensive pre-application discussions with a wide range of stakeholders over a significant period of time. These stakeholders include LBL, TfL, Network Rail, the Environment Agency, the Greater London Authority, local landowners and businesses, local resident's groups and other organisations with an interest in Brixton.
- 3.2. The application is referable to the GLA as it exceeds the relevant thresholds set out in the Town and Country Planning (Mayor of London) Order 2008 (as amended). Accordingly, the GLA has been involved in formal pre-application discussions with the Applicant and LBL.
- 3.3. The Applicant has engaged with the Local Planning Authority's pre-application advice service. This has facilitated a broad series of meetings with the Local Planning Authority and their advisors which has informed every aspect of the final proposal. This included in particular, presenting the emerging proposals to the Council's Growth Investment Panel.
- 3.4. The Applicant has engaged in the formal pre-application process with Greater London Authority Officers. The first pre-application meeting was held on 17th October 2019, from which a formal feedback letter was provided on 19th December 2019. Overall, the proposal was deemed to have the potential to enhance the commercial and employment offer of Brixton as well as facilitate increased town centre permeability. The principle of an office-led mixed-use development in this location was strongly supported, with the provision that issues raised regarding town centre uses, urban design and transport are fully addressed.
- 3.5. The final proposals are being submitted following a consultation process with the local community. Designs were presented through two rounds of public consultation in May 2019 and subsequently in January/February 2020 with changes to the scheme, following feedback provided by the local community and the LBL. The applicant also hosted a workshop for local groups in August 2019. This workshop was held to open up a dialogue with the local community to see how the flexible central public space included in the development could work for them, and what sort of events they believe could take place.
- 3.6. Based on the feedback received, the public response to the proposals are mixed, with residents broadly supportive of the need for office space in central Brixton, and the extension of the markets. A significant number of respondents supported the inclusion of a flexible central space that could be used as a food hall, for exhibition events or for activities organised by local groups.

- 3.7. A number of people surveyed were opposed to the scale of the building and a number of respondents expressed negative views on the design of the building. There was also a substantial amount of comments regarding the perceived gentrification of Brixton.
- 3.8. As a result of all these discussions the proposed development has evolved through detailed and careful design, testing, consideration and refinement. The height of the building has been reduced to reflect concerns by a total of 11 metres. This reflects resident's concerns while maintaining the much-needed office space, including affordable workspace, required in Brixton plus retaining the potential to provide a new central space for the community and extending the popular Brixton Markets.
- 3.9. The applicant has submitted proposals which will directly benefit the borough and local community by providing much-needed office space, an extension of the world famous Brixton Market, increased permeability throughout Brixton town centre, a new public square, the re-provision of public toilets made free of charge and a flexible central space that can be used by the local community.

4. PROPOSAL

4.1. This application seeks full planning consent for the demolition of the existing building on the Site and the re development to create an office-led mixed-use scheme.

4.2. The description of development is:

“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.”

4.3. The Design and Access Statement submitted with this application fully illustrates and describes the proposed development.

Scale, Massing and Design

4.4. The building is mixed-use consisting of flexible retail, leisure and office uses. These uses are split across two podiums of G+19 and G+8 storeys in height respectively.

4.5. Users would enter the building through common access points at ground floor level. Small and informal lobbies for office workers are integrated within the market circulation.

4.6. The scheme is split between two blocks both for office spaces with a publicly accessible restaurant on level eight of the smaller building. Ground and first level are common to both with market space and retail units whilst second and third floor are linked.

Uses

Ground Floor

4.7. The ground floor of the proposed development aims to be an extension of the Brixton Village market, both in visual and scale terms with retail units distributed along the main circulation paths. The uses at ground floor level will be mostly A1 and A3 uses with entrance lobbies for the offices and a flexible central space in the middle of the market for community or event use.

4.8. At first floor level, there are smaller units located around the main staircase and two larger spaces to the east and west. There will be a combination of A1/A3//B1 and D2 uses at this level.

- 4.9. Above this, the remaining storeys will accommodate office floorspace (including affordable workspace) and a restaurant.
- 4.10. The proposed floorspace of the respective uses has been provided below:

Use	Proposed GIA (sqm)
A1/A3	2910 ¹
D1/D2	647
B1	25,445
Total	29,002

Transport

- 4.11. It is proposed that the scheme will be a car-free with the exception of disabled parking spaces.
- 4.12. The main access to the building is on Pope's Road, with secondary means of access located on the east/west side street for servicing only.
- 4.13. For the retail units, the main entrances are located on Pope's Road, with secondary access located on the east/west side street (for servicing only). The units are accessible from the within the market streets facilitating possible future access on the side street depending on the tenant. The market will be publicly accessible throughout the opening hours. The main access points are located at ground floor whilst the retail spaces allocated at first floor can be reached via a staircase placed within the central flexible market space.
- 4.14. For the office floorspace, lobbies are situated within the market on the east and west side. In order to access the lobbies, users need to enter the market via one of the access points.
- 4.15. With regard to vehicular access, the main access point to the building is located on the service yard on Valentia Place. The proposed cycle parking provision is included below and detailed further within the Transport Statement.

¹ 537sqm is allocated to the restaurant at 8 floor

Type	Sheffield Stand	Two-Tier	Bicycle Lockers*	Total
Long Stay	32	259	90	381
Short Stay	30	N/A	N/A	30
Total	62	259	90	411

*The bicycle lockers also have the flexibility and security to be used as short stay visitor facilities.

Public Realm

- 4.16. The proposed scheme offers transformative improvements to the existing public realm provision on Pope's Road. Not only will the scheme be facilitating 9,450 sq ft of public realm available for pedestrian enjoyment, which more than double the current provision on Site, but the quality of the public realm and general appearance of Pope's Road will be significantly improved to create a space that is both permeable and pleasant to spend time in.
- 4.17. In addition to the improvements to the public realm, the public toilet provision that sits adjacent to the site exists on Site is proposed to be relocated within the proposed development, increased and made free of charge in order to provide a more spacious public realm whilst significantly improving the quality and quantity of the public toilet provision.
- 4.18. The market streets with active frontages provide paths with single frontages but also facilitate the potential for double frontages inspired by the current aesthetic and style of the existing markets. This extension of the public realm would extend and preserve the character and authenticity that has made the market so popular over the years.
- 4.19. The central space for community use within the market would equally facilitate the permeability of the ground floor and therefore the overall porosity of the Site. This publicly accessible open space resembles an open courtyard or atrium with natural light and a connection to the natural environment provided by the sky visible through the glass roof.

Energy & Sustainability

- 4.20. The proposed development will aspire to meet the intent of policy by delivering a minimum on-Site carbon dioxide emissions reduction of 31.5% over a baseline building (NCM baseline and conditions), based on the approach, information, analysis and contents reported in this document.

- 4.21. The development has been designed to meet sustainability and energy targets which are driven through the adopted and draft London Plan, the adopted and draft Local Plan and the UK Building Regulations. Full details can be found within the Energy and Sustainability Assessments submitted with this application.

5. PLANNING POLICY FRAMEWORK

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be in accordance with the development Plan unless material considerations indicate otherwise.
- 5.2. The development Plan for the Site comprises:
- The London Plan: Spatial development Strategy for Greater London (March 2016);
 - The Draft London Plan (Intention to Publish, December 2019);
 - Lambeth Local Plan (September 2015);
 - Draft Revised Lambeth Local Plan (January 2020)
- 5.3. A new Draft London Plan was issued in December 2017 which has undergone consultation and Examination In Public (EIP). Following the Examination in Public, the Inspectorate has concluded that the Draft London Plan meets the tests of soundness subject to recommended modifications. An “intend to publish” version of the draft London plan was issued to the Secretary of State in December 2019. The new London Plan is expected to be adopted in in 2020 and therefore the policies will hold weight in the determination of planning applications.
- 5.4. Following approval by Lambeth Council, the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to Policies Map January 2020 were published in January 2020. The Lambeth Local Plan is still in its early stages and holds little weight in the determination of planning applications.
- 5.5. The following planning policy and guidance documents are material considerations in the determination of the application:
- National Planning Policy Framework (NPPF)
 - National Planning Policy Guidance (NPPG)

Revised NPPF (2019)

- 5.6. The revised National Planning Policy Framework was updated on 19 February 2019 and sets out the government's planning policies for England and how these are expected to be applied.
- 5.7. This revised Framework replaces the previous National Planning Policy Framework published in March 2012 and revised in July 2018.

Key Adopted Local Policy

ED3 – Large Offices
ED5 – Railway Arches
ED6 – Town Centres
ED7 – Evening Economy and Food and Drink Uses
ED11 – Visitor Attractions, Leisure, Arts and Culture Uses
ED13 – Markets
ED14 – Employment and Training
S1 – Safeguarding Existing Community Premises
S2 – New and Improved Community Premises
T1 – Sustainable Travel
T2 – Walking
T3 – Cycling
T4 – Public Transport Infrastructure
T7 – Parking
T8 – Servicing
EN1 – Open Space and Biodiversity
EN4 – Sustainable Design and Construction
EN5 – Flood Risk
EN6 – Sustainable Drainage Systems and Water Management
EN7 – Sustainable Waste Management
Q1 – Inclusive Environments
Q5 – Local Distinctiveness
Q6 – Urban Design – Public Realm
Q7 – Urban Design – New development
Q8 – Design Quality: Construction Dealing
Q9 – Landscaping
Q12 – Refuse/Recycling Storage
Q13 – Cycle Storage
Q17 – Advertisements and Signage
Q25 – Views
Q26 – Tall and Large Buildings
PN3 - Brixton

Key Emerging Local Policy

ED1 – Offices (B1a)

ED1 – Affordable Workspace

ED6 – Railway Arches

ED7 – Town Centres

ED8 – Evening Economy and Food and Drink Uses

ED12 – Markets

ED13 – Visitor Attractions, Leisure, Arts and Culture Uses

ED15 – Employment and Training

S1 – Safeguarding Existing Social Infrastructure

S2 – New or Improved Community Premises

T1 – Sustainable Travel

T2 – Walking

T3 – Cycling

T4 – Public Transport Infrastructure

T7 – Parking

T8 – Servicing

EN1 – Open Space, Green Infrastructure and Biodiversity

EN4 – Sustainable Design and Construction

EN5 – Flood Risk

EN6 – Sustainable Drainage Systems and Water Management

EN7 – Sustainable Waste Management

Q1 – Inclusive Environments

Q5 – Local Distinctiveness

Q6 – Urban Design – Public Realm

Q7 – Urban Design – New development

Q8 – Design Quality: Construction Dealing

Q9 – Landscaping

Q12 – Refuse/Recycling Storage

Q13 – Cycle Storage

Q17 – Advertisements and Signage

Q25 – Views

Q26 – Tall and Large Buildings

PN3 - Brixton

6. PLANNING ASSESSMENT

- 6.1. This section assesses the proposed development against planning policy and planning guidance.

Principle of development

- 6.2. The principle of the proposed development accords with current and emerging planning policy guidance. National policy, the London Plan and the Local Plan all seek to ensure that development achieves the highest possible intensity of use compatible with the local context to deliver a scale of development which makes the most effective and efficient use of land.
- 6.3. The Intend to Publish London Plan Policy SD6 states that the viability and vitality of London's varied Town Centres should be promoted and enhanced by "*ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local area as well as London-wide economy.*" Lambeth within its Local Plan (2015) recognises Brixton as area for 'regeneration' and a suitable location for development that supports sustainable development that enhances local distinctiveness of neighbourhoods and delivers regeneration objectives (Policy D1). Local Plan policy PN3 outlines that Brixton's role as a distinctive major multicultural and diverse town centre will be safeguarded and promoted through careful and sensitive regeneration.
- 6.4. The Site has been identified for development within the Local Plan Site Allocation 16 for mixed-use development and as outlined within the allocation "*provides a major opportunity for a wider range of town centre uses, improving the frontage along Brixton Station Road, public realm improvements and integration with development on Site.*"
- 6.5. The regeneration proposals for the Site, in terms of their mix of uses, architectural quality and the provision of a new commercial building, meets the above policy requirements and will set an excellent benchmark for future developments within Brixton.
- 6.6. The proposed development is considered to achieve sustainable development since it meets all the above key planning principles for re development of the Site. The proposal is a mixed-use re development of a brownfield Site located in a highly accessible location by public transport in London.
- 6.7. 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.

Land Use

Flexible Uses A1/A3/D1/D2

- 6.8. In accordance with the Lambeth Local Plan Site allocation, the proposed building includes town centre uses and will provide active frontages at ground floor level and across the lower floors of the building.
- 6.9. The planning application reports have been assessed on the potential split of ground and first floor uses as shown below in accordance with the principles set out in policy PN3 as outlined in more detail below. The basement consisting of plant, back of house and welfare facilities has been proportioned against the three uses proposed.

Ground Floor

Ground Floor		
Use	Proposed GIA	%
A1/A3 ²	1779.3	90 (split 50/50)
D1/D2	0	
B1	197.7	10
Total	1977	100
First Floor		
Use	Proposed GIA	%
A1/A3 *	395	20
D1/D2	592	30
B1	988	50
Total	1,975	

- 6.10. The applicant is seeking maximum flexibility of the space 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.
- 6.11. 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 markets at Brixton

² This excludes the restaurant area at 8 floor

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.

- 6.12. Policy E9 ITP London Plan states that *“a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres”* and that Boroughs should *“secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies.”*
- 6.13. London Plan Policy 4.8 supports a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. It notes that Boroughs should take a proactive approach to planning for retail, including the need to bring forward capacity to secure a sustainable pattern of provision.
- 6.14. Local Plan policy ED6 of the Local Plan states that the Council will support the vitality and viability of Lambeth’s centres and CAZ frontages by supporting retail, service, leisure and recreation and other appropriate uses.
- 6.15. Local Plan policy ED13 states that *“Proposals for new off-street permanent, indoor or street markets, car boot sales and temporary markets will be supported provided that:*
- (i) the scale, nature and location would not harm existing shopping facilities or markets located within town centres;*
 - (ii) there would not be an unacceptable impact on local amenity or the general environment;*
 - (iii) adequate provision is made for customers’ and traders’ parking, deliveries and servicing, set-up and storage of stalls, power supply and storage and disposal of refuse; and*
 - (iv) there would not be an unacceptable impact on traffic flow or increase in traffic congestion in the area.”*
- 6.16. Policy PN3 of the Local Plan states that within the indoor markets, no less than 50% of the ground floor units should be in A1 use and no more than 50 per cent should be in A3 use within each indoor market. *Emerging Local Plan policy PN3 states requires that in the indoor markets that no less than 50 per cent of floorspace should be in A1 use and no more than 50 per cent floorspace should be in A3 use within each indoor market.*

- 6.17. Site Allocation 16 in the Local Plan identifies retail, leisure and possible market extension and associated uses as 'preferred uses' within the Brixton Central Allocation.
- 6.18. Whilst the emerging Lambeth Local Plan holds limited weight in the determination of planning applications, following discussions with Officers at LBL, the proposed split of A1/A3 uses takes into account the current and emerging Local Plan policies.
- 6.19. The strong cultural and heritage values of Brixton Market are important to the local community and must be respected going forwards in accordance with policy ED13 . As part of the proposed development, the Applicant will look to:
- Continue to improve the markets, boost footfall and bring new and different types of people to the area;
 - Recognise the key sensitivities in the area (related to gentrification) and learn lessons from previous regeneration projects;
 - Develop a clear approach to supporting existing tenants and ensuring that local people receive future social and economic benefits;
 - Acknowledge the changing demographic of the borough (influx of young people aged 23-35) and recognise that these groups tend to have higher disposable incomes which could benefit the market if capitalised upon;
 - Provide flexible floorspace on the secondary/upper levels as an opportunity to capitalise on the increased popularity and current shortfall in provision of these uses in the area (as identified in the Brixton Economic Action Plan);
 - Enhance the physical environment of the market, providing investment to improve the interior and exterior, enhancing visitor amenity.
- 6.20. Markets have positive effects on town centres, increasing tourism number and footfall (25% for town centres).The provision of retail and leisure floorspace within the proposed development will contribute towards the overall character and activity within the development, adding to the mix of uses found locally. The provision of A1/A3/D1/D2 floorspace is therefore fully compliant with London Plan Policy 4.8 and Local Plan Policy ED6, ED13, PN3 and Site allocation 16 which support the principle of these uses in the Town Centre and sustainable access to goods and services and encourages activation of the ground floor.

Office

- 6.21. The NPPF (2019) at Chapter 6 seeks to provide policies that contribute towards building a strong, competitive economy. Paragraph 80 states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It is stated that significant weight should be placed on the need to

support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 6.22. Accordingly, policy 4.2, Offices, of the adopted London Plan (2016) states that at a strategic level, the Mayor will, and other stakeholders and boroughs should, support the management and mixed-use development and re development of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises. Policy also states that all parties should recognise and address strategic as well as local differences in implementing this policy to meet the distinct needs of central London's office market, by sustaining and developing its unique and dynamic clusters of 'world city' and other specialist functions and business environments. Renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility is also encouraged at the strategic level.
- 6.23. Within the Lambeth Local Plan (2015), Policy ED2 states in order to maintain a stock of Sites and premises in business use, development for business (B1) uses will be supported on all Sites. Policy ED3 concerns large offices (classified as those greater than 1,000sq.m) and provides that these will be supported in Brixton.
- 6.24. Current office supply in Brixton stands at just 7% of built stock with a vacancy rate of just 2%. The largest office buildings include Squire and Partners' headquarters at Ferndale Road, which they developed for their own occupation, the Lambeth Civic Centre, Blue Star House and International House, the co-working space run by 3space at International House. The net effect is that the significant majority of office occupiers in Brixton are small businesses seeking expansion.
- 6.25. In the Brixton area in particular, a low availability of commercial office space is recognised as an increasing concern that needs addressing, with additional office space explicitly mentioned as an 'area for action' moving forward in the Brixton Economic Action Plan. Brixton is a central hub of activity, but office space was extremely low in 2015 at less than 100sqm, compared to over 2,000sqm in Angel, Shoreditch & Camden, illustrating need for employment space. More recent research carried out by Impact Brixton finds that available office space in Brixton is six times lower than the London average. Further information on the need to office space is located within Volterra's Economic Impact Assessment which supports the application.
- 6.26. The proposed development prioritises the delivery of high-quality office floorspace which, given the identified need within Brixton and due the Site's highly accessible location with a town centre, is considered to make the best use of this highly accessible Site.

- 6.27. The aspiration for the building, which is reflected within the design, is to create an eco-system for all office businesses, who can scale up and grow within the building, taking advantage of the opportunities resulting from clustering with other businesses of different sizes.
- 6.28. Overall, the provision of office (B1) uses within the proposed development is entirely appropriate given the existing uses on the Site and its location within Brixton and accords with planning policies in both the London Plan (Policies 4.1 & 4.2) and the Local Plan (Policies ED2, ED3 & PN3).

Affordable Workspace

- 6.29. Draft LP Policy E2 states that where more than 2,500sqm of B1 space is proposed, the development should include flexible workspace or smaller units suitable to micro-businesses and SMEs.
- 6.30. Affordable workspace is defined by the Draft New London Plan as *“workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements.”*
- 6.31. Lambeth, in its Draft Revised Local Plan, is proposing to introduce policy ED2 to require affordable workspace in accordance with the provision of Draft New London Plan policy E3. In the Brixton Creative Enterprise Zone (CEZ) where the Site will sit states that developments proposing at least 1000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace as affordable workspace for a period of 25 years with 50% of market rents.
- 6.32. The Brixton Economic Action Plan identifies affordable workspace as an area for action going forward, citing that there is evidence of strong demand for flexible and affordable space that is suitable for small businesses. The provision of this workspace also fulfils objectives set out in the Future Lambeth plan, in order to ‘support small businesses and entrepreneurs in the early stages of development’, enhancing entrepreneurialism and economic activity in the local area. The use of the workspace benefits Lambeth’s key target groups and creates an ecosystem for local residents and businesses to progress through.
- 6.33. The emerging policy ED2 carries little weight until it has been through an Examination. Notwithstanding this, the Council has indicated in pre-application advice that it is attaching weight to the draft policy and will apply it to the proposed development.

The Applicant has therefore considered how the proposed development may be able to meet the requirements of the draft policy, without having an unacceptable impact on viability and deliverability. The draft policy goes on to state that affordable workspace can be made available on one of the following ways

- Leased and managed by an affordable workspace provider on the council's approved list
- Managed directly by the owner where it is demonstrated to the satisfaction of the council that they have the necessary skills and experience and an agreed workspace management plan is in place.
- Leased by the owner to one or more end users on the council's approved register of organisations that require non-managed affordable workspace.

6.34. The Applicant is proposing 10% of the B1 floorspace to be provided as affordable workspace. This equates to a provision of circa 2,546 sqm GIA of affordable workspace. It is the preference of the applicant to manage the affordable workspace. The aspiration is to work in partnership with Impact Brixton, who 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.

6.35. Impact Brixton in March 2020 opened up a new co-working space in Market Row– a community workspace bringing together people and organisations of all backgrounds to make a better South London. With a much larger co-working space for the initiative to thrive, Impact Brixton can now support more individuals in the community, changing their lives through entrepreneurship. The space within market Row has a varied range of amenities, including a podcast room, meeting rooms for coaching and training, development kitchen, events space and business concierge service for local companies. 160 members have already moved into the new space at Brixton Market, the majority of which are Lambeth residents. This space is only a quarter of the size of the space that Impact Brixton would potentially move into at the proposed development, highlighting the scope to deliver substantial numbers of employment opportunities to LBL residents.

6.36. Impact Brixton, through the use of their community-led co-working space, create positive employment and skills opportunities for LBL residents through:

- The provision of business development opportunities with SMEs and entrepreneurs, providing the core skills required for start-ups;

- The empowering of local residents with free educational training schemes and employment training; and
 - Providing collaboration space enabling benefits from the clustering of information and similar businesses, including Open Project Night on Mondays (the opening of the space for free to local individuals and organisations) allowing for networking opportunities.
- 6.37. Utilising Impact Brixton as the affordable workspace provider will create a more holistic approach towards the package of public benefits offered at the proposed development, as it would allow Impact Brixton to use the space to not only provide discounted workspace to local residents and businesses, but also operate employment and upskilling programmes to the considerable benefit of local residents.
- 6.38. Just as Impact Brixton's model and focus has evolved over time to the successful community-focused project that it is today, it is possible that this will further evolve to meet the needs of local people and businesses. The Applicant is committed to delivering its affordable workspace provision in such a way that it continues to build on what has been achieved to date and further serves the needs of local workers, job seekers, entrepreneurs and community groups. This is set out in further detail in the Social Economic Report prepared by Volterra submitted in support of the application.
- 6.39. Further detail on the affordable workspace proposal will be developed in discussion with the Council.

Design

- 6.40. This section should be read in conjunction with a number of other planning application documents, of which the principal documents are listed below;
- Planning Application Drawings
 - Design and Access Statement
 - Townscape, Heritage and Visual Impact Assessment
- 6.41. This planning statement addresses the land use context of the proposed development, showing how the proposal will meet the land use objectives for the Site and complement existing land uses in the area. The Design and Access Statement accompanying the planning application provides an analysis of the constraints and opportunities presented by the Site and how the design of the proposed development has evolved and responds to these. It sets out the design objectives, urban design principles and building design principles which have informed the final design of the proposals.

- 6.42. The proposed development has been the subject of extensive pre-application discussions with planning and design officers at both LBL, GLA and neighbouring properties and the local community (please refer to SCI) and the design has evolved in response to these discussions.
- 6.43. Chapter 12 of the NPPF (2019) concerns the achievement of well-designed places. It advises that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.
- 6.44. Paragraph 131 provides that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.45. The adopted London Plan (2016) requires all buildings and structures to be of the highest architectural quality, and be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. Buildings, especially tall ones, should not cause unacceptable harm to the amenity of surrounding land and buildings. Buildings should provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces. Buildings should optimise the potential of Sites.
- 6.46. Within the Lambeth Local Plan (2015) policy Q7 concern urban design in new development. It states that the Council will support new development provided that it is of a quality design, which is visually interesting, well detailed, well-proportioned and it has a bulk, scale/mass, siting, building line and orientation which in the case of Opportunity Areas, respects and contributes towards the intended future character of the area.
- 6.47. The proposals have been designed by internationally-acclaimed architects Adjaye Associates. The building will signpost Brixton and create a new local landmark for the Town Centre. In particular, the design of the development will:
- Create new buildings of architectural distinction that will improve the quality of the immediate area and contribute to the architectural richness of Brixton.
 - Will form a local landmark building which responds positively to the valued historic aspects of its context.
 - Be of an exceptional design quality shown through the materials and of an architectural expression that would complement the appearance of the Conservation Area;

- Provide 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.

6.48. In this way, the proposals will achieve the highest quality of architectural design as required by planning policy at all levels for such a major development proposal. A more detailed explanation of the design proposal is contained within the submitted Design & Access Statement.

Public Realm

6.49. London Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

6.50. Policy Q6 'Urban design: public realm' advises that, the Council supports development (new build and conversions) that provides:

(i) the most effective use of the Site (in the context of the proposed use) and does not prejudice the potential development of, or access to, adjoining plots;

(ii) attractive, uncluttered, co-ordinated public realm that enhances the setting of and spaces between buildings;

(iii) improved legibility, permeability and convenient access via direct routes for all users (but avoiding alleyways and back lanes);

(iv) a building line that maintains or improves upon the prevailing building line (forward encroachment of established building lines will only be supported where it is fully justified and where no harm to amenity or local character will result);

(v) new or enhanced open space (including gaps between buildings) and landscaping/trees;

(vi) robust street furniture, permeable paving, good-quality construction materials and landscape design which is appropriate for its Site and immediate locality;

(vii) for the removal of redundant or unsightly street furniture/clutter;

(viii) modestly-sized infrastructure cabinets in unobtrusive locations and places them below ground in conservation areas and adjacent to heritage assets;

(ix) retains and enhances the heritage value of existing spaces, in terms of the spatial form, function, connection and relationship with surrounding buildings, materials and finishes (such as historic paving, street furniture and boundary treatments; and

(x) pedestrian and cycle-priority environments which are not dominated by vehicles whether moving or parked.”

6.51. Site Allocation 16 with the Local Plan outlines the key design principles of the Site and outlines that the council will support development on the Site that:

- *Provides opportunities to improve the station entrance and station facilities*
- *generally, including lift access and cycle parking;*
- *Public realm improvements to Brixton Station Road to include links to both the mainline and underground stations, the opening up of arches to provide links to north-south routes east of Pope's Road and potential links to Brixton Village*
- *Enhances the arches to provide active uses and routes through;*
- *Opens up Pope's Road to provide a wider public space with the potential to*
- *Provide improved and/or additional market spaces;*

6.52. The existing Site comprises two retail stores of poor architectural quality with blind facades and metal bollards running the full length of the Site, creating a barrier between Site and pedestrians. The public realm is limited to Pope's Road and is only activated when the retail store is open. Adjacent to the boundary of the Site lies the existing poor-quality public toilets which further limits the public realm frontage. In addition, there is no connection between Pope's Road and the corridors between Site and railways arches. There is a lack of connectivity North South particularly between the Brixton Village and Pope's Road which is contrary to the aspirations set out in the Site Allocation.

6.53. As part of the development there are significant opportunities to improve the public realm within and around the Site. The proposal seeks to facilitate the optimal permeability of the Site whilst improving the overall quality of the public realm. There are a number of opportunities for public realm that have been identified during the design process as follows:

- *Activating the frontage of Pope's Road by creating a more generous and active public realm from the public space into the proposed market.*
- *Activation will encourage residents to use the streets not just in the day but in the evening increasing natural surveillance.*
- *Facilitating the North South permeability, particularly into Brixton Village, by creating a permeable market with publicly accessible market streets.*

- Introducing a generous covered publicly accessible open space in the centre of the Site that can host various community activities and potentially facilitate the connectivity between the Brixton Village and the Pop Brixton Site
- 6.54. Within the proposed development, the public realm largely consists of two components internally and externally. The first component is mostly located outside of the Site boundary line next to Pope's Road. As referenced above, the existing public realm surrounding Pope's Road is generally of low quality and compressed, especially during active street market hours, when orientation and accessible movement becomes exceedingly restricted. The poor condition of the existing public toilets block, as well as the existing fence blocking the back of the station, encourages the accumulation of litter and antisocial behaviour.
- 6.55. As part of the proposal the Applicant is proposing to relocate the existing toilets within the new development. The provision will be double over what currently exists and similar to what the Applicant has done in Brixton Village markets the toilets will become free of charge. By relocating the public toilets creates the opportunity for a significantly sized and more permeable area of public realm with the potential to provide a central area for Brixton Railway Station users and the local area. To ensure that the space is as generous as possible without impacting on the overall deliverability of the development, the architect has designed the scheme with a setback of six metres from the boundary that will create further shelter for users and traders whilst also softening the threshold between Pope's Road and the proposed new market. The newly proposed public realm will provide considerably greater space than what currently exists on Site, creating a new, improved public space for central Brixton. The new scheme will allow up to 877 sqm of enhanced open space. This will facilitate and encourage further social interaction and activation creating a more useable, safer environment. Increasing the permeability will open up the surrounding markets that lead to Brixton Station and offer a new access route that enables easier navigation and travel from Station Road's various amenities and open up towards Atlantic Road and Electric Avenue.
- 6.56. The second component to the public realm lies within the Site boundary. The ground floor aims to provide continuation with Brixton Village, both in terms of visual form and scale, with retail units distributed along the main circulation path. The proposal's overall aspiration is to maintain a high level of flexibility of uses within the market floors – thus, multiple units can be combined to form larger units if required. The flexible market facilitates permeability across the ground floor.
- 6.57. Positioned within the centre of the Site, the publicly accessible space influences the overall massing of the scheme and provides a designated split in between the two volumes. Its functions primarily as a central square, providing places to sit and enjoy,

whilst also acting as a food hall and extension of the market on a normal day scenario, but also offers the potential to host a number of various activities and events. A large skylight fills the space with natural light enhancing the area as a pleasant and airy space to engage and spend time in, which is pivotal for the proposal. This atrium also provides breakout space from the offices and a visual connection between the office and market uses. In total, the proposed external and internal area equates to circa 1777sqm of space.

- 6.58. The development as currently proposed does not include the arches adjacent to the Site, save for two within the Applicant's ownership adjacent to Brixton Village and directly opposite onto Brixton Station Road. The current layout of the ground floor has been designed to facilitate two major potential connections that might come forward in the future. One is represented by the north-south connection from the Brixton Village through the publicly accessible open space into the Pop Brixton Site. The second is the public accessibility of the side streets with the potential implementation of the existing arches. The proposed development is not predicated on and does not require the additional arch access but has been designed to facilitate it if and when possible.
- 6.59. In line with the objectives of the Site allocation, the proposed development proposes and facilitates the following key public realm improvements;
- Opportunities to improve the station entrance and station facilities;
 - Opens up 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.
- 6.60. In general, the proposals will transform the public realm in and around the Site, from an impermeable, confusing and poor-quality series of routes and spaces, to one cohesive high quality, connected space which will integrate the new buildings with their surroundings, aid orientation and legibility and provide more direct and pleasant routes for the many thousands of people who walk through the area on a daily basis.

Principle of Tall Buildings

- 6.61. This Section of the Planning Statement assesses the development against tall building Policies in the London Plan and at local level.

6.62. It is important to note that Policy 7.7 of the London Plan at a strategic level requires tall or large buildings to be part of a 'plan-led approach' to changing or developing an area by the identification of appropriate and sensitive locations.

6.63. The principle of a tall building in this location is supported by the London Plan Policy 7.7, which requires tall buildings to be generally limited to Sites within the CAZ, Opportunity Areas, areas of intensification or town centres, that have good access to public transport. The policy sets out the following criterion when assessing a Site's suitability for a tall building:

6.64. *Tall buildings should:*

- a. *generally be limited to Sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport*
- b. *only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building*
- c. *relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;*
- d. *individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London*
- e. *incorporate the highest standards of architecture and materials, including sustainable design and construction practices*
- f. *have ground floor activities that provide a positive relationship to the surrounding streets*
- g. *contribute to improving the permeability of the Site and wider area, where possible*
- h. *incorporate publicly accessible areas on the upper floors, where appropriate*
- i. *make a significant contribution to local regeneration.*

6.65. Each of these points is dealt with in turn below:

- a. ***generally be limited to Sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport***

The Site is located within a Town Centre that has good access to public transport, and as stated previously, is one of the best-connected stations in London. The Site also benefits from the highest PTAL rating of 6b, excellent.

Brixton within Local Plan D1 recognises Brixton as area for 'regeneration' and a suitable location for development that supports sustainable development

that enhances local distinctiveness of neighbourhoods and delivers regeneration objectives.

b. ***Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building***

The Site is located within Brixton Town Centre, in close proximity to Brixton underground and railway station. As assessed in the accompanying Townscape, Visual and Built Heritage Assessment (TVIA) prepared by Tavernor Consultancy, the context of the Site can be considered as six individual character areas (refer to page 100 of THVIA).

It is considered that the proposed development would not impact adversely on these character areas. Where the proposed tall building is visible, it would act as a marker for Brixton overground station and market complexes nearby, to the east of the TCA. The scale and character of the proposed tall building would be appropriate to its location and its design would be of the exceptional quality required of a landmark building. The likely effect on the TCA through this change to its skyline is considered to be small and neutral.

c. **relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;**

In the surrounding residential areas, the upper parts of the proposed tall building would be visible on streets orientated towards the Site and in views across the open spaces of parks. It would provide a local landmark for the urban centre of Brixton just beyond these areas, and for the overground Station and market complex in particular. It would be of the highest design quality, appropriate to a building with this level of visibility within the townscape. It would not be visible from all parts of the residential areas around the commercial centre and the key characteristics of those areas would not be affected by this change to the skyline.

The proposed development would be most visible in the central parts of Brixton (described in the assessment as Centre South and Centre North). In its design and materials, it would signal the particular character of the Site – defined by the adjacent rail viaducts – and it would respond to characteristics of built form locally. It would aid the legibility of central Brixton on the skyline, clearly marking the location of Brixton Station and the route of Pope's Road which connects the townscape north and south of the viaducts. The flexible spaces provided at the lower levels will expand the existing complex of market spaces and will accommodate community services and events which will bring

further life and activity to the area. The townscape of central Brixton would be enhanced.

- d. **individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London**

The development is likely to be the first tall building that comes forward in the Brixton Central SPD Area (save for International House and Chartham Court). The building 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.

The Site is highly suitable for such a landmark – it is situated next to Brixton's overground railway station (to which it has been designed to facilitate improved access in the future); it will provide, and landmark, new market space and improved connections through the local network of market areas, which are integral to the historic identity of Brixton; it is in the vicinity of two existing tall buildings (International House and Chartham Court) and within a wider area earmarked for large-scale regeneration by the Council.

- e. **Incorporate the highest standards of architecture and materials, including sustainable design and construction practices**

The development is of the highest architectural quality, designed by world renowned architects Adjaye Associates. The architectural expression of the buildings and their materiality has evolved through analysis of local streetscapes and of the rail viaducts which define the Site. Both buildings would be light-coloured brick, articulated with light grey concrete. At the upper levels of the tall building, recessed terraces are located at the east and west ends of the building, softening the profile of the building on the skyline and adding interest through the robust expression of the building structure and the soft and green character of the planting within. The building would have a clear and distinctive top on the local skyline.

The design concept has been designed in close consultation with Lambeth Council and the GLA. It is considered that the standard of architecture is of a quality appropriate for a tall building, and that this establishes a benchmark of high quality for future tall building developments in Brixton and London as a

whole. Further details of the architecture are contained within the accompanying Design and Access Statement.

f. Have ground floor activities that provide a positive relationship to the surrounding streets

The ground floor of the proposed scheme aims to enhance permeability of the urban grain, facilitating the future connectivity between Brixton Village and Pope's Road, and more generally from south to north. The proposed ground floor flexible uses will provide a positive contribution to the surrounding streets by transforming a currently hostile environment into an active place and bringing more people into the area.

g. contributes to improving the permeability of the Site and wider area, where possible

As described in more detail in paragraph's 6.45-6.56 the proposed public realm improvements transform the Site into one which is much more desirable for pedestrians to move across. The Site has also been designed entirely with future prospects for development at Pop Brixton in mind and allowing a potential north south through-route between these two Sites

h. Incorporate publicly accessible areas on the upper floors, where appropriate

The ground and first floor will provide flexible/active uses that will be open to the public.

j. makes a significant contribution to local regeneration.

The development offers significant regenerative benefits through the principle of re development of a Site of little activity and little architectural merit, to provide a building of high architectural quality, and a public use comprising flexible retail and leisure use. In addition, flexible office floorspace in an area where there is an identified undersupply. The Site will also deliver a complementing high-quality public realm, affordable workspace, local employment opportunities and Community Infrastructure Levy.

6.66. Policy Q26 of the Lambeth Local Plan states that tall and large buildings will be supported where:

- 1) *They are located within areas identified as being inappropriate locations*
- 2) *That there is no adverse impact on the significance of strategic or local views or heritage assets including their settings*

- 3) *Design excellence is achieved, the proposal makes a positive contribution towards the townscape and skyline*
- 4) *Is of the highest standards or architecture and does not have an unacceptable impact on the surrounding microclimate.*

- 6.67. In accordance with Annex 11 of the Local Plan, the Site sits within Site Allocation 16 which has been identified as being within an area as sensitive, not inappropriate to tall buildings. The Lambeth Local Plan provides support for tall buildings in appropriate locations particularly where these would deliver regeneration and economic objectives in accordance with London Plan and national policies.
- 6.68. The Lambeth Local Plan also recognises that tall buildings can also contribute to place-shaping by providing landmarks and defining gateways.
- 6.69. The proposed development includes a tall building In line with the plan-led approach advocated by relevant planning policy and guidance, the proposals are coming forward on a Site which is located in an area, where the potential for a number of tall buildings has been identified. The Site is highly suitable for such a landmark – it is situated next to Brixton's overground railway station (to which it has been designed to facilitate improved access in the future); it will provide, and landmark, new market space and improved connections through the local network of market areas.

Townscape and Views

- 6.70. An assessment of the impact of the proposals on local and strategic views, as well as an assessment on built heritage assets as defined in the NPPF (excluding archaeology) is provided in the accompanying 'Townscape, Heritage and Visual Impact Assessment', prepared by the Tavernor Consultancy and Cityscape.
- 6.71. The London View Management Framework (LVMF) designates, protects and manages twenty-seven views of London and some of its major landmarks. Policy 7.11, London View Management Framework, of the London Plan, identifies that the Mayor has designated a list of strategic views that he will keep under review. These views are seen from publicly accessible and well used places. They include significant buildings or urban landscapes that help to define London at a strategic level. Within the views, the Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value.
- 6.72. Policy Q26 of the Lambeth Local Plan concerns views and states that the Council will maintain a list of views of local interest and seek to protect their composition and character from harm. Particular regard has been paid to the identification of views of the Westminster World Heritage Site.

- 6.73. The views selected for the Visual Assessment have been agreed in consultation with LBL. The views set includes 26 verified views and 7 unverified views. Dusk versions have been prepared of three of the verified views.
- 6.74. The proposed development would not affect any strategic views defined in the GLA's London Views Management Framework (LVMF). The proposed development would be visible in locally protected views from Brockwell Park: "(i) Views NNW from Brockwell Park of Brixton landmarks; and views N and NNE to the City". In these panoramic views (represented in view 5 of this assessment), many of London's landmarks are seen across the horizon and landmarks in Brixton are also visible in one part of this view. The proposal would appear within an established urban skyline and would appear at a similar height to the distant Vauxhall cluster but would be evidently much closer than those buildings. It would restore a sense of spatial hierarchy on the skyline and reinforce the association of Brockwell Park with the urban centre of Brixton nearby.
- 6.75. The THVIA concludes that the proposed development would make use of a Site which has no heritage interest and little townscape value at present. It would not affect the fabric of any listed or locally listed building and the Site is not located in a conservation area. 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 would 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.

The historic environment

- 6.76. National planning guidance on the historic environment is provided by the NPPF. It defines what constitutes the historic environment, including 'heritage assets' (which can be designated or undesignated), and sets out the policy approach to assessing development proposals which affect heritage assets either directly or in terms of their setting.
- 6.77. Designated heritage assets include World Heritage Sites, listed buildings and conservation areas among other designations.

- 6.78. Chapter 7 focuses on policies relating to the built environment, both the historic built environment and new development. These policies have been taken into careful consideration in the formation and assessment of these proposals. Of particular relevance are Policy 7.1 Lifetime neighbourhoods, Policy 7.2 which promotes the highest standards of accessible and inclusive design and Policies 7.4 and 7.5, which protect local character and public realm. Policy 7.6 which makes provision for the highest architectural quality (7.6Ba) and requires that architecture should make a positive contribution to the city (7.6A).
- 6.79. Policies 7.8 to 7.10 consider the Historic Environment, 7.8C states that 'development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail' (p.287). Paragraph 7.31 expands on the Policy 7.8, stating that:
- "Heritage assets such as conservation areas make a significant contribution to local character and should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form. development that affects the setting of heritage assets should be of the highest quality of architecture and design and respond positively to local context and character."*
- 6.80. Policy 7.10 World Heritage sites requires that 'development should not cause adverse impacts on World Heritage sites or their settings (including any buffer zone). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance' (7.10B).
- 6.81. Intend to Publish London Plan HC1 States that heritage conservation and growth will replace Policy 7.8 of the adopted London Plan (Ref 1-7) and states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.82. Policy Q5 of the LBL Local Plan states that Local distinctiveness states that local distinctiveness should be sustained and reinforced through new development and that proposals which respond to local character, deliver design excellence and make a positive contribution to historic context will be supported.
- 6.83. The Site is located next to the Brixton Conservation Area, and most of the listed and locally listed buildings considered are significant aspects of the Brixton Conservation Area.
- 6.84. The character and appearance of the Brixton Conservation Area is largely defined by buildings and spaces of important phases of the area's development – the few remnants of initial early 19th century suburban development (including St Matthews

and the former villa Effra House); mid-late 19th century civic and commercial buildings which followed the insertion of the railways; a 'Moderne' phase of development, which brought the covered markets and the Astoria (now O2 Academy); and ambitious plans for wholesale change in the 1960s, only a small part of which was realised with the Brixton Rec (and, outside of the CA, International House, Southwyck House (the Barrier Block)). The different character of key streets in the area – the main roads but also secondary routes such as Electric Avenue - and of key spaces - remaining parts of Rush Common, St Matthew's Gardens and Windrush Square – are also integral to the special character and appearance of the Brixton Conservation Area.

- 6.85. Where the change to the settings of heritage assets is greatest – in their close proximity– there would nonetheless be no harm caused to their heritage significance due to the particular character of the listed buildings closest to the Site. The Site is located in the close vicinity of three listed structures and groups of structures: the Brixton Recreation Centre (Grade II), the Platforms Piece (Grade II) sculptures on the Overground Station platforms and the Granville Arcade (Brixton Village) and Market Row parts of the market complex, which are listed together (at Grade II). The proposed tall building would be seen in close relation to these listed structures, however as assessed by Tavernor consulting their special heritage interest would be unaffected and the Brixton Rec would remain a robustly scaled and well-composed building. The proposed tall building would be seen from within much of the covered markets and, where visible, will aid navigation through the area and would not affect the historic, architectural and cultural interest of these special spaces or their appreciation by visitors. The special interest of these buildings, and the legibility and appreciation of their special interest, would not be altered by this new development within their close settings.
- 6.86. The TVIA concludes that *“considering the particular special heritage interest of relevant listed buildings and conservation areas, it is concluded that the Proposed development would sustain their heritage significance. That is because it would not harm the fabric or any aspect of the setting which contributes to the significance of any heritage asset. The particular siting, massing and architectural character of the design proposals will form a local landmark building which responds positively to the valued historic aspects of its context.”*

Transport

Accessibility and public transport impact

- 6.87. Paragraph 103 of the NPPF states that the planning system should actively manage patterns of growth, focussing significant development on locations which are or can be made sustainable, to limit the need to travel and offer a genuine choice of transport modes. Paragraph 111 requires developments that will generate significant amounts

of movement to provide a Travel Plan and a Transport Assessment, so that the likely impacts can be assessed. Paragraph 110 states that applications for development should give priority to pedestrians and cycle movements, both within the scheme and with neighbouring areas, and second – so far as possible – facilitate access to high quality public transport, with layouts and appropriate facilities that encourage public transport use.

- 6.88. Policy 6.3 of the London Plan (2016) states that “ development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. development should not adversely affect safety on the transport network.”
- 6.89. Policy T1 of the Lambeth Local Plan states that to achieve sustainable travel, the Council will promote a sustainable pattern of development in the borough, minimising the need to travel and reducing dependence on the private car.
- 6.90. In managing the road network, Policy T1 states that walking, and cycling will be given priority, with private cars least prioritised. development that generates a significant number of trips will be required to be located in an area with an appropriate level of public transport accessibility and where public transport capacity can accommodate the proposed increase in number of trips.
- 6.91. Within Policy T7, which concerns parking, the Council states that development should provide car parking within the maximum standards in the London Plan, reflecting the public transport accessibility of the development Site, with minimal provision in areas with good public transport accessibility. development should be car free, particularly in areas where alternative modes of transport are available and where public transport accessibility is high.
- 6.92. In relation to disabled-accessible parking, Policy T7 states that these parking bays should be a proportion of the overall provision (as calculated using the London Plan guidance) and not added separately.
- 6.93. A full assessment of the development in traffic and transport terms is contained within the Transport Assessment. The development has been assessed against relevant criteria for all modes of transport and for the construction and operational phases. The Site is located within an area of excellent public transport accessibility, with the highest possible PTAL rating of 6B, and is therefore appropriate for a high density, mixed-use development.
- 6.94. Due to the proximity of the Application Site to rail infrastructure and assets, the Applicant has consulted with both Network Rail and TfL and has engaged in early discussions about any potential impact the development may have on the adjacent

rail infrastructure and operations. Whilst no adverse technical issues have been identified at this stage, there will be continued engagement as the design develops. On that basis the Applicant acknowledges that there will be a pre-commencement Condition on the planning permission that any necessary Asset Protection Agreement(s) will be required to be in place, and associated identified technical approvals obtained.

Car Parking

- 6.95. The proposed development will provide zero car parking on-Site, in accordance with local and regional policy on car parking within highly accessible locations. All employees and visitors will be expected make use of sustainable and active modes of travel to arrive and depart from the Site.
- 6.96. The Applicant is willing to provide a contribution to disabled parking in lieu, in order to fulfil the disabled parking requirement for the proposals based on relevant policy standards. It is proposed that a disabled parking space is provided on Brixton Station Road, which is the nearest vehicular route to the Site. It is pertinent to note that vehicle access is also provided at the rear of the Site which enables pick-up and drop-off for disabled users. The Site is also highly accessible by public transport, with Brixton Underground Station providing step-free access.

Cycle Parking

- 6.97. The development seeks to accord with cycle parking for each land use in line with the draft New London Plan and LBL Draft Revised Local Plan where possible, including the provision of accessible bicycle parking, Sheffield stands, cycle lockers, showers and changing facilities.
- 6.98. The development includes long stay / employee cycle parking for the office and market uses at basement level 1 which is accessible via lift from Pope's Road. The lift measures 2m x 2m and is therefore capable of accommodating fixed frame bicycles without difficulty. Associated with the cycle parking are changing facilities, showers and lockers.
- 6.99. Short-stay visitor cycle parking is provided within the single railway arch (that is in the Applicant's ownership) at the north west corner of the Site. The cycle parking has been arranged to optimise the number of spaces but also provide a suitable pedestrian and cycle route through the arch as a connection between the Site and Brixton Station Road.
- 6.100. All the cycle parking provided is situated within secure, lit and sheltered areas. Where short stay cycle parking is provided within the public realm, lighting and security will

be provided both naturally as part of the public realm strategy, but also in association with the development itself e.g. through Site management and CCTV measures.

- 6.101. Within the total number of cycle parking spaces provided, 26 of the Sheffield stands are identified as also being usable by non-standard bicycles, equivalent to approximately 6%.
- 6.102. The cycle parking strategy is considered to be reasonable and appropriate on the basis that it provides a high number of cycle spaces for both long and short stay users, whilst also ensuring that there is the freedom of choice regarding the type of cycle parking available. The uptake of cycle parking is primarily dependent on the quality of the facilities provided and ensuring that users have easy and secure access.
- 6.103. Notwithstanding the current provision, the Applicant is also willing to consider on-going monitoring of the cycle parking post-occupation in the event that demand necessitates an increase in the number of spaces. It is proposed that this could be secured within the Travel Plan document if considered necessary / appropriate. The Applicant is also willing to work with the Council to identify and address a perceived shortage of cycle parking in the wider town centre.

Servicing

Market

- 6.104. Servicing for the market units can be undertaken on-street from Pope's Road as in the existing situation, whereby loading is permitted outside of 08:00 – 18:00 when it becomes pedestrianised. Delivery vehicles are able to park in the vicinity of the Site along Pope's Road for ease of goods transfer to the various market units.
- 6.105. In the event that Pope's Road is unavailable (e.g. during pedestrianised hours), vehicles can alternatively use the vehicle access into the Site from Valentia Place, transferring goods from the east of the Site to the relevant market units, which will be accessible at several locations throughout the Site.

Office

- 6.106. Servicing for the office use will take place via a service yard to the rear of the development, which takes access from Valentia Place as in the existing situation. The service yard is currently used by the Applicant for deliveries and refuse collection for the existing use on the Site, with an established right of access in place to facilitate servicing and refuse collection for the newly proposed office use.
- 6.107. The service yard provides sufficient space for up to three 7.5t / 8m box vans to park simultaneously, as well as a refuse vehicle to enter the yard in forward gear. This has

been demonstrated on the swept path analysis included at Appendix F of the Transport Assessment. Importantly, this arrangement would also maintain vehicle access to the railway arches along the north of the south of the Site, both for operational and emergency purposes.

Restaurant (Floor 8)

- 6.108. Deliveries to the standalone restaurant will be from the rear of the development via Valentia Place given the proximity to the back of house area and goods lift to transfer items up to the 8th floor.
- 6.109. It is estimated that the standalone restaurant will generate a demand for 3 to 7 deliveries per day, with 5 deliveries being the assessed median, as the end occupier is unknown. As with the office use, the majority of deliveries will be undertaken by small to medium sized vehicles delivering food and beverages and the occasional non-perishable item such as stationery and other dry and cleaning supplies.

Waste

- 6.110. A consolidated waste store is provided for the office and market uses within the Site.
- 6.111. The market units for the proposed development will come under the existing markets operated by the Applicant and will therefore benefit from the existing waste collection regime, albeit amended as necessary to accommodate the additional refuse for the development, which will be collected on-Site initially.
- 6.112. The day to day operation of the existing markets is overseen by in-house management which includes a team of porters who are responsible for overseeing the storage and collection of waste, as well as keeping the markets clean and tidy. The porters will transport waste from each of the units at set collection times to the waste store provided at the rear of the Site
- 6.113. Waste storage for the office will be provided within the consolidated waste store where a total of 6 x 1,100L bins for recycling and 4 x 1,100L bins for general waste will be provided. Waste for the office units will be managed by the SMT, who will ensure waste is transported correctly from the office to the waste store. Waste will be collected Monday – Friday, with two vehicle attendances to collect recyclables and general waste separately.
- 6.114. The proposed development would not have a detrimental impact on the highway or local transport network, and is in accordance with relevant adopted national, regional and local policy guidance. It therefore meets the test of the NPPF and paragraph 109, which states that “ *development should only be prevented or refused on highways*

grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Energy and carbon emissions

- 6.115. Paragraph 148 of the NPPF notes that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 6.116. At paragraph 154 the NPPF states that in determining planning applications, local planning authorities should expect new development to:
1. comply with any development Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
 2. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.117. Policy 5.2 of the London Plan (2016) advises that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
1. Be lean: use less energy
 2. Be clean: supply energy efficiently
 3. Be green: use renewable energy
- 6.118. The policy also states that the Mayor will work with boroughs and developers to ensure that major developments meet the stated targets for carbon dioxide emissions reduction in buildings. Policy 5.3 requires the highest standards of sustainable design and construction to be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
- 6.119. London Plan Intend to Publish Policy SI3 outlines that Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure rising from large-scale development

proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development. Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options. Energy masterplans should identify:

- 1) major heat loads (including anchor heat loads, with particular reference to Sites such as universities, hospitals and social housing)
- 2) heat loads from existing buildings that can be connected to future phases of a heat network
- 3) major heat supply plant
- 4) possible opportunities to utilise energy from waste
- 5) secondary heat sources
- 6) opportunities for low temperature heat networks
- 7) possible land for energy centres and/or energy storage
- 8) possible heating and cooling network routes
- 9) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
- 10) infrastructure and land requirements for electricity and gas supplies
- 11) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector

6.120. In line with the new guidance from GLA, the energy statement for the development will assess carbon savings using the new carbon emission factors (SAP10). Cooling mitigation strategies will be evaluated to avoid overheating risk within building spaces.

6.121. The proposed development is a single development and so it will not be possible to connect to a Site wide communal heating system. It is proposed that the development will use a shared domestic hot water system with heating source from an air to water heat pumps.

6.122. The development is proposed to use efficient air to water heat pumps in office and Office Space blocks. This takes advantage of the lower carbon emissions of the electric grid as well as the efficiency of the heat pumps coefficient of performance.

6.123. The proposed development will aspire to meet the intent of policy by delivering a minimum on-Site carbon dioxide emissions reduction of 31.5% over Part L2A 2013 (and a 15% reduction at the 'Be Lean' stage), based on the approach, information, analysis and contents reported in this document.

6.124. Energy and sustainability Strategies are submitted with the planning application. This assesses how the development accords with the key policies and guidance relating to energy efficiency and provides an indication of the measures that are likely to be

incorporated within the final design. The Strategy also contains a BREEAM pre-assessment that describes that the development is targeting a BREEAM 'Excellent' rating.

Environmental effects

6.125. Policy 7.7, Location and design of tall and large buildings, within the Lambeth Local Plan (2016) states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.

6.126. Lambeth Local Plan (2016) policy Q2 concerns amenity and states that development will be supported if:

- 1) *visual amenity from adjoining Sites and from the public realm is not unacceptably compromised;*
- 2) *acceptable standards of privacy are provided without a diminution of the design quality;*
- 3) *adequate outlooks are provided avoiding wherever possible any undue sense of enclosure or unacceptable levels of overlooking (or perceived overlooking);*
- 4) *it would not have an unacceptable impact on levels of daylight and sunlight on the host building and adjoining property;*
- 5) *the adverse impact of noise is reduced to an acceptable level through the use of attenuation, distance, screening, or internal layout/orientation;*
- 6) *adequate outdoor amenity space is provided free from excessive noise or disturbance, pollution or odour, oppressive enclosure, wind/downdraught and overshadowing; and*
- 7) *service equipment (including lift plant, air handling/extract, boiler flues, meter boxes, gas pipes and fire escapes) is fully integrated into the building envelope or located in visually inconspicuous locations within effective and robust screening/enclosures, and does not cause disturbance through its operation*

6.127. The proposed development has been assessed in terms of its potential for impacts on a number of environmental issues, which include, inter alia;

- 1) Daylight, sunlight and overshadowing;
- 2) Wind microclimate;
- 3) Noise; and
- 4) Air quality

6.128. The accompanying environmental reports provide a full assessment of the proposals in relation to each of these matters, however a summary of the relevant planning policies and the scheme's impacts is provided below.

Daylight, sunlight, overshadowing, light pollution and solar glare

6.129. The basis for the technical analysis and methodology employed for sunlight and daylight and overshadowing is derived from The Building Research Establishment Guidelines entitled Site Layout Planning for Daylight and Sunlight 2011 by P J Littlefair (The BRE Guidelines).

6.130. The NPPF, at paragraph 123 (part c) 'achieving appropriate densities', states that 'local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a Site (as long as the resulting scheme would provide acceptable living standards)'. Whilst the Proposed development is for an office-led scheme, the need to make efficient use of land and consider impacts on daylight and sunlight flexibly is still applicable.

6.131. The adopted London Plan does not refer to daylight, however the Draft New London Plan states that, in relation to tall buildings at part 3)a) of Policy D8, 'wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building'. Policy D4 requires in Part F that 'The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context...'. This approach is emphasised within the London Plan Housing SPG, which states at paragraph 1.3.45 that: "*An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large Sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.*"

6.132. *The SPG goes on to say at paragraph 1.3.46 that "The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large Sites may necessitate standards which depart from those presently*

experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.”

- 6.133. Lambeth's Local Plan, at Policy Q2, states that 'development will be supported if: (iv) it would not have an unacceptable impact on levels of daylight and sunlight on the host building and adjoining property'. It refers to use of the BRE Guidelines as an assessment tool for planning applications. The BRE Guidelines are the principal source of guidance in relation to daylight and sunlight, although they carry no statutory weight and are not mandatory. Policy Q2 is retained in the Draft Revised Lambeth Local Plan (2020), with an additional requirement to consider the impact on the gardens or outdoor spaces of adjoining properties.
- 6.134. GIA has undertaken a technical analysis which shows that, following the implementation of the proposed scheme, some surrounding properties will experience reductions beyond the parameters and target values suggested as acceptable by the BRE guidelines.
- 6.135. Based on the Current Baseline scenario, upon successful implementation of the proposed Scheme, 11 of the 19 (57.9%) properties assessed will meet the national numerical values identified in paragraphs 2.2.21 and of the BRE handbook for daylight and sunlight. Overall, in relation to daylight, there will be an 86.8% compliance rate for VSC and a 90.7% compliance rate for NSL. In terms of daylight overall, 578 of the 702 rooms assessed achieve BRE compliance for both NSL and VSC (82.3%).
- 6.136. In relation to sunlight, 99.8% of windows and 100% of rooms assessed will achieve compliance for APSH. Each of these overall figures is considered to be high, given the urban context of the Site. GIA is therefore of the opinion that overall, unacceptable harm is not caused to the surrounding residential properties and the daylight and sunlight impacts are commensurate for the surrounding urban context.
- 6.137. Based on the Future Baseline scenario, upon successful implementation of the proposed Scheme, 11 of the 19 (57.9%) properties assessed will meet the national numerical values identified in paragraphs 2.2.21 and of the BRE handbook for daylight and sunlight. In terms of daylight, overall there will be an 88.9% compliance rate for VSC and a 91.2% compliance rate for NSL. In terms of daylight overall, 600 of the 702 rooms assessed achieve BRE compliance for both NSL and VSC (85.5%). In terms of sunlight, 100% of windows and 100% rooms assessed will achieve BRE compliance for APSH. As with the Current Baseline, the overall compliance rates attributed to the Future Baseline are considered to be high, taking the urban context of the Site and the surrounding area into consideration. GIA is therefore of the opinion that overall, unacceptable harm is not caused to the surrounding residential properties and the daylight and sunlight impacts are commensurate for the surrounding urban context, in relation to the Future Baseline.

6.138. In terms of overshadowing, in the Current Baseline scenario 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 in line with BRE guidelines. Therefore, overshadowing of surrounding open spaces following the implementation of the proposed development is considered acceptable.

Wind

6.139. Policy Q26 of the Lambeth Local Plan concerns tall and large buildings. The policy text states that, in relation to wind effects, proposals will be supported where they do not have an unacceptably harmful impact on their surroundings including microclimate and wind turbulence.

6.140. Wind conditions around the existing Site are generally calm, as expected for a relatively low-rise area without any significantly tall buildings. Wind conditions range from suitable for sitting to strolling use with localised walking use conditions on Pope's Road during the windiest season. Wind conditions would be generally calmer during the summer season, ranging from suitable for sitting use to strolling use.

6.141. With the inclusion of the proposed development, there would be a general increase of the wind speeds around the Site. Wind conditions during the windiest season would generally range from suitable for sitting to walking use, with four locations with instances of walking use wind conditions at ground level during the windiest season.

6.142. With the inclusion of the wind mitigation strategy, wind conditions at and surrounding the proposed development would be safe and comfortable for all uses throughout the year; however slightly windier than desired wind conditions would persist at two locations in the context of the existing surroundings only. Wind mitigation measures at these locations have been suggested within Section 6 "Wind Mitigation Measures" of the RWDI report.

Noise & Vibration

6.143. Policy 7.15 within the London Plan (2016) concerns the reduction and management of noise. At a strategic level the transport, spatial and design policies of the London Plan will be implemented in order to reduce and manage noise to improve health and quality of life and support the objectives of the Mayor's Ambient Noise Strategy.

6.144. Amongst other objectives, the policy states that development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development, mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of

new development without placing unreasonable restrictions on development. Proposals should also separate new noise sensitive development from major noise sources.

- 6.145. An environmental noise and vibration survey has been carried out at the Site. The representative free field background sound levels measured during the survey were LA90 54 dB during the daytime and LA90 44 dB at night.
- 6.146. Based on the requirements of the LBL and on the results of the noise survey, all proposed plant must be designed, such that the cumulative noise level at 1 m from the worst affected windows of the nearby noise sensitive premises does not exceed LAeq 47 dB during the daytime and LAeq 37 dB during the night. The average ambient noise levels measured during the survey were LAeq,16h 60 dB during the daytime and LAeq,8h 56 dB at night.
- 6.147. The vibration survey undertaken indicated that tactile vibration and re-radiated noise are unlikely to be problematic for the proposed development. In addition, no adverse impacts are expected in respect of increases in traffic flow as a result of the development.

Air Quality

- 6.148. Policy 7.14, Improving air quality of the London Plan (2016) states that The Mayor recognises the importance of tackling air pollution and improving air quality to London's development and the health and wellbeing of its people. He will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimize public exposure to pollution.
- 6.149. The air quality impacts associated with the proposed development have been assessed.
- 6.150. The proposed development will generate additional traffic on the local road network, but the assessment has shown that there will be no significant effects on any existing, sensitive receptor.
- 6.151. During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works.

6.152. Overall, the construction and operational air quality effects of the development are judged to be 'not significant'. The proposed development also meets the London Plan's requirement that new developments are at least 'air quality neutral.'

7. PLANNING BENEFITS

- 7.1. The proposal has been carefully and sensitively developed over an iterative design process. For clarity, key aspects of this approach are summarised below and should be given full and significant weight.
- 7.2. The result of this iterative and considered approach is the delivery of an exemplar and well-designed scheme that will deliver the following substantial public benefits that form material considerations of the planning application that should be afforded full weight in the determination of the application.

Employment & Skills

- 7.3. The proposed development will deliver a mixed of retail, office and leisure uses to complement Brixton Town Centre and LBL regeneration objectives.
- 7.4. The proposed development would promote 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.
- 7.5. 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.
- 7.6. The proposed development will contribute to securing greater provision of office space suitable for SMEs, aid in meeting the city's requirement for affordable workspace, and attract domestic and international visitors to the local area – all of which stimulate the local economy.
- 7.7. 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
- 7.8. The proposed 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.

- 7.9. 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 provision of the gym. 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.
- 7.10. 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.
- 7.11. 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.
- 7.12. The Applicant intends to commit to providing a number of apprenticeship positions through the demolition and construction phase, and the end-use operational phase. In line with LBL policy, the Applicant will commit to the recruitment of one apprenticeship per 1,000sqm (GIA) of development, equating to the recruitment of 26 apprenticeships over the overall construction and/or operational phases.
- 7.13. The Applicant will also commit to the recruitment of one individual who has been long-term unemployed per 2,500sqm (GIA) of development, equating to the recruitment of 10 opportunities for the long-term unemployed in the end-use operational phase.
- 7.14. The Applicant is proposing 10% of the B1 floorspace to be provided as affordable workspace. This equates to a provision of circa 2,546 sqm GIA of affordable workspace. The Applicant will work in partnership with Impact Brixton, who would 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.

- 7.15. 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.
- 7.16. The scheme will provide a package of Section 106 and CIL contributions in addition to other S106 benefits already mentioned.

Design and Public Realm

- 7.17. 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.
- 7.18. 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.
- 7.19. 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.
- 7.20. 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.
- 7.21. The existing public toilets located adjacent to the existing Site are to be relocated within the proposed development, refurbished, increased and made free of charge to provide a more spacious public realm whilst significantly improving the quality and quantity of the public toilet provision.

Sustainability

- 7.22. The proposed development will incorporate sustainability measures and seek to achieve BREEAM excellent.
- 7.23. 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.

8. PLANNING OBLIGATIONS

Draft heads of terms for a section 106 agreement

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

- Public realm and highway works;
- Replacement and relocation of public toilets;
- Employment and Skills Plan
- Landscape and public realm strategy
- Affordable workspace
- Delivery and servicing management plan
- Travel plan
- Cycle Parking Monitoring
- Section 278 agreement
- Monitoring
- Affordable Workspace

9. CONCLUSION

- 9.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development Plan unless other material considerations indicate otherwise.
- 9.2. 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.
- 9.3. This Planning Statement assesses the development against the development Plan and other relevant national, regional and local planning policy, including the aspirations established in the draft Local Plan and the draft London Plan. It is considered that the principle of the development accords with current and emerging planning policy and guidance.
- 9.4. The proposed development would promote economic growth across Brixton Town Centre by providing a new office floorspace ecosystem in an area where there is an identified lack of supply.
- 9.5. The proposed development will contribute to securing greater provision of office space suitable for SMEs, aid in meeting the city's requirement for affordable workspace, and attract domestic and international visitors to the local area – all of which stimulate the local economy.
- 9.6. 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.
- 9.7. 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.

- 9.8. 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.
- 9.9. The impacts of the development have been fully assessed by the supporting application documents and mitigation measures have been identified where necessary. The development is considered to be entirely appropriate for the Site, and the area.
- 9.10. The development proposals are considered to accord with the development Plan, and therefore benefit from the presumption in s38(6) of the 2004 Act. Furthermore, it accords with the policies of the NPPF as a whole and is deemed to be 'sustainable development' in terms of Paragraph 14, and therefore the development should be granted full planning permission.