

(By email)

Our reference: MGLA110722-4779

Date: 5 August 2022

Thank you for your further correspondence which the Greater London Authority (GLA) received on 8 and 12 July 2022. I am sorry that you were not happy with the way the GLA has responded to a request for information (ref MGLA070622-2567). I am now responding to you under the GLA's internal review procedure.

## Background

On 5 June you asked for:

*We would therefore be grateful if you could provide copies of the requests to speak together with all accompanying statements of the issues, the respective capacity as objectors or supporters and which organisations (if any) are requesting to speak.*

*We have also received the 1st June 2022 notice of postponement of the Representation Hearing agreed by the Mayor. We were surprised by this announcement as we had been expecting the publication of the report for the hearing on that day as you had indicated and in line with usual GLA practice.*

*Therefore we understand that by 1st June it will have been the case that the report would either have been finalised, or largely finalised, with the input of key consultees, including statutory bodies such as Historic England.*

- 1. In light of this it would therefore be of great assistance in understanding the current position if you would be able to share with us the following information:*
- 2. A copy of the officer's report (in draft form or otherwise) prepared for the Representation Hearing planned for the 10th June 2022*
- 3. A copy of all communications between the Mayor's office, Lambeth council and the applicant (and their agents) in respect of the request for the postponement of the Representation Hearing and the subsequent decision by the Mayor*
- 4. A schedule of the specific "significant concerns raised by Historic England and others" referred to in the notice of postponement of the 1st June 2022 and as identified in the correspondence referred to in ii) above*
- 5. Copies of correspondence between the Mayor's office and Historic England*

On 10 June 2022, you submitted a substantially similar request for:

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1. Copies of all requests to speak and accompanying statements sent to the GLA after the date that the public hearing scheduled for 10th June 2022 was announced to consultees on 20 May 2022. This should include those from supporters and objectors and the organisation (if any) represented.
2. A copy of the case officer's report (most recent draft or final version) prepared for the public hearing 10th June 2022 and a list of those to whom it was circulated prior to the notice of postponement issued 1st June 2022.
3. A copy of all communications between the Mayor's office and/or GLA officers, Lambeth council and the applicant (and their agents) relating to the request for the postponement of the public hearing and the subsequent decision by the Mayor 4. A schedule of the specific "significant concerns raised by Historic England and others" referred to in the notice of postponement of 1st June 2022 and as identified in the correspondence referred to in 3) above

On 18 June 2022 you also asked for:

1. The attached letter from Oliver Sheppard of DP9 Ltd to Lucinda Turner of the GLA dated 31st May 2022 refers to a recent London Review Panel report. Please provide us with a copy of this report.
2. The same letter refers to a meeting held on 30th May 2022 between Oliver Sheppard and Lucinda Turner. Please provide us with a copy of the minutes or record of that meeting.

The GLA combined your requests and provided an interim response on 21 June 2022 with some of the information within scope of your request, and on 29 June 2022 with the remainder of the information you were seeking with the exception of a copy of the officer's report (in draft form or otherwise) prepared for the Representation Hearing on 10 June 2022, which we advised was exempt from disclosure under Regulation 12(4)(d) of the Environmental Information Regulations (EIR) 2004. Our responses are both published at [EIR - Pope's Road Representation Hearing \[Jun 2022\] | London City Hall](#)

## Your complaint

On 8 and 12 July 2022, you submitted the following complaints:

1. Case officers report - We note that the GLA consider that disclosure of this information is exempt by virtue of regulation 12 (4)(d) of the EIR regulations. However, Item 2 of our EIR dated 10/6/22 requested the following (emphasis added). A copy of the case officer's report (most recent draft or final version) prepared for the public hearing 10th June 2022 **and a list of those to whom it was circulated prior to the notice of postponement issued 1st June 2022.** We therefore look forward to receiving information relating to the distribution of the case officers report as above. If, as your response suggests, the report may not have been in final form prior to the issue of the notice of postponement, please provide details of any communications related to its contents or conclusions, whether these communication may have been via email, letter, messaging, phone or any other method. We consider that this request in any case falls under item 3 of our request dated 5/6/22.
2. 'Concerns raised' - Our information request of 5/6/22 asked for (emphasis added) "a schedule of the 'significant concerns raised by Historic England **and others**' referred to in the notice of postponement...." Furthermore, the Mayor states in his letter dated 8/6/22 to the applicant's agent (Oliver Sheppard of DP9 Ltd) that (emphasis added):

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*This deferral is in order for the Applicant to re-engage and consider changes to the scheme, and particularly on the basis that you have acknowledged that significant concerns have been raised by Historic England **and others** which would require commensurate changes if these are to be overcome; and that re-engagement should involve the local community as well as GLA officers, Lambeth Council and Historic England. Although you have kindly provided us with information relating to the concerns raised by Historic England and the London Review Panel, **please can you confirm whether the information you have provided so far is a full response to the definition of 'others' as intended and described by the Mayor in his letter 8/6/22 and/or the notice of postponement.***

3. *Records of meetings and attendance - It would appear from your response to our EIR requests that the GLA does not hold any record or any notes of the meeting on 30/5/22 referred to in DP9 Ltd's letter to Lucinda Turner of 31/5/22. You have however provided us with a record of text messages between Lucinda Turner and Historic England dated 30/5/22- these are on page 68 of your response. They refer to a meeting that took place on that day. Please can you confirm whether this was the same meeting that was attended by Lucinda Turner and DP9 or a separate meeting. If it was a separate meeting, please provide us with any records available in connection with that meeting and/or the attendees. If it was the same meeting, please provide us with a list of attendees.*
4. *Communications via text or similar - We note as above that your response to these recent EIRs includes communications via text message or similar. As you know, we have made a number of requests under the EIR regulations relating to this planning application. Please can you confirm whether there were any text or similar communications relating to previous EIRs we have submitted that were relevant to our requests, but not disclosed at the time.*
5. *There is a presumption in favour of disclosure (regulation 12(2)). There is no mention of this presumption in the letter of 29 June 2022.*
6. *Mr Robinson presents two arguments against disclosure: first, it would hinder 'effective' consultation since disclosure would distract; second, disclosure is not necessary since the report will be released before the final decision. Taking those in turn, the ICO's guidance is clear that, first, 'It should generally be possible for the authority to minimise this distraction by providing an explanation of any deficiencies or differences' (paragraph 24) No explanation has been provided why this is not possible. Second, later disclosure is irrelevant—the public interest needs to be assessed as the situation stands now, not at some later juncture.*
7. *In addition, in the same guidance the ICO makes clear that the closer the document is to completion the less reason there is not to disclose (paragraph 26).*
8. *Finally, the ICO guidance states: 'the EIR have been in force for several years, and it should now be clear to public authorities that the exceptions are not absolute and that information may be disclosed even though an exception is engaged. [...] Officials also have a responsibility to provide information and advice as part of their job, whether or not it may subsequently be disclosed under the EIR' Thus, the impact of disclosure should be minimal and certainly not outweighed by the presumption of disclosure.*

## Internal review

An Internal Review will usually be conducted, wherever possible, by someone who was not involved in handling the original request. Due to staff shortages within the Information Governance team, it will not be possible on this occasion. I will now respond to each point of your complaint in turn:

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1. The case officers report was circulated to the following:

- Lucinda Turner, Assistant Director of Planning (GLA)
- John Finlayson, Head of Development Management (GLA)
- Deputy Head of Development Management (GLA)
- Special Projects Team Leader (GLA)
- Planning Officer (GLA)
- Culture & Community Spaces at Risk - Senior Policy Officer (GLA)
- Regeneration team - Senior Project Officer, Regeneration Officer (GLA)
- Mellissa Murphy QC – Francis Taylor Building
- TfL Legal manager (GLA Shared service)

We consider that details of *any communications related to its contents or conclusions, whether these communication may have been via email, letter, messaging, phone or any other method* fall under Regulation 12(4)(d)\*\*

2. Please find attached further information we hold within scope of your request. I confirm that the GLA failed to recognise the part of your request which referred to concerns expressed by 'others'. The information I am disclosing to you today falls within the category of statutory consultee responses.

We hold further information which fall within the category of 'others' which fall within the following categories:

- Public consultation responses\*
- GLA officer advice (for example, from the GLA Regeneration team)\*\*
- Contracted advice\*\*

\*We estimate that we hold 3500 public consultation responses received either as electronic or in hard copy. We consider processing this part of your request would fall under the exception to disclose because it is considered to be 'manifestly unreasonable' under regulation 12(4)(b) of the Environmental Information Regulation (EIR).

This provision allows public authorities to refuse requests which are obviously or clearly unreasonable or when the estimated cost of compliance is too great. In reaching this decision we have considered the views of the Upper (Information Rights) Tribunal in '*Craven v IC & DECCC [2012] UKUT442 (AAC)*' in respect of the EIR exception under regulation 12(4)(b), the formal guidance issued by the Information Commissioner's Office<sup>1</sup> along with Decision Notices regarding this EIR exception, such as FS50585926<sup>2</sup> amongst others, which all acknowledge that public authorities may use the fees regulations as the basis of considering the cost and time of complying with a request.

In this instance, we have decided this request falls within the parameters of regulation 12(4)(b) and is manifestly unreasonable because of the considerable amount of time that would be required to collate and review the information.

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<sup>1</sup> [Manifestly unreasonable requests - regulation 12\(4\)\(b\) \(ico.org.uk\)](https://ico.org.uk/for-organisations/guide-to-the-information-commissioner/manifestly-unreasonable-requests/)

<sup>2</sup> [fs\\_50585926.pdf \(ico.org.uk\)](https://ico.org.uk/for-organisations/guide-to-the-information-commissioner/manifestly-unreasonable-requests/fs-50585926/)

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Further consideration is given to the aggregated number of requests already submitted on this planning application and the unacceptable burden placed on the on their limited resources of the Planning team and unreasonable distraction from normal work.

A public authority can only withhold information if the public interest in maintaining the exception outweighs the public interest in disclosing the information. We are mindful of the general public interest in transparency and accountability, and of the presumption in favour of disclosure and to read exceptions restrictively.

A sizeable proportion of the information we have identified would likely engage one or more of the disclosure-exception (exemption) provisions of the EIR (In particular Regulation 13 (Personal Information)). We would consequentially have to spend a considerable amount of time reviewing each piece of information individually to consider whether or not it would be exempt from disclosure. The time and resources required to review this information would be unreasonable given the potential for it to remain exempt information.

**\*\*We consider that these two categories in addition to any communications related to its contents or conclusions of the Case Officers report fall within scope of our existing arguments to withhold the requested information at Regulation 12(4)(d).**

3. This is the same meeting as attended by Lucinda Turner (GLA) and DP9. Please note that this was a LB Lambeth organised meeting. Our recollection is that there were the following attendees:

- Lucinda Turner – GLA
- John Finlayson – GLA
- Rob Bristow – Lambeth
- Robert O’Sullivan – LB Lambeth
- Lambeth officer (x1)
- Historic England (x2)
- Oliver Sheppard – DP9
- Taylor McWilliams – Hondo Enterprises
- Tavernor Consultancy (x2)

4. No further text messages are held within scope of this or previous requests.

5. In relying on this EIR exception provision under the regulations, the GLA is required to balance the public interest in order to decide whether the information should be withheld.

Under Regulations 12(1)(b), the GLA can only withhold the information if, in all of the circumstance sof the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information. Furthermore, under regulation 12(2), we must apply a presumption of disclosure.

6. Taking in to consideration your counter arguments in turn:

- *‘It should generally be possible for the authority to minimise this distraction by providing an explanation of any deficiencies or differences’ (paragraph 24) No explanation has been provided why this is not possible*

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The same guidance also states that when this is not possible and there is a real risk that public debate would be distracted and therefore seriously impact on the public authority's resources, this may be a public interest argument for maintaining the exception. We informed you within our response that release of this information at this time would divert attention and resources away from the task at hand and towards responding to external thoughts whilst discussions are still ongoing.

- *Second, later disclosure is irrelevant—the public interest needs to be assessed as the situation stands now, not at some later juncture*

We informed you of our public interest arguments against disclosure at the time we responded to your request. We consider these arguments against disclosure to still be the case.

7. *In addition, in the same guidance the ICO makes clear that the closer the document is to completion the less reason there is not to disclose (paragraph 26).*

The GLA has internal processes by which the case officers report is presented to the Mayor for consideration prior to publication<sup>3</sup>. In this instance the public hearing has been delayed and so therefore has the window that the Mayor has to consider the case officers final report and our subsequent publication of the report prior to the Hearing itself.

Further, we consider the 'safe space' period to be essential for Planning Officers to deliberate robustly and comprehensively, considering all options and their potential impacts, in order for the best possible decisions to be taken when considering the completion of the case officers reports. The internal communications and advice from the consultants is intrinsic to the content of what the case officer puts in the report.

It is the timing of your request that we also put emphasis on and the chilling effect which would be likely to occur causing the loss of frankness and candour in debate which would flow from an untimely disclosure of information prior to publication. These arguments for premature disclosure of information are recognised in respect of planning matters by the ICO in decision notices such as FER0663603<sup>4</sup> where public authorities are in the process of formulating a decision or recommendation.

8. We are mindful that are EIR exceptions are not absolute and we balanced a public interest exercise in our response to you dated 29 June 2022.

## Outcome

If following this internal review, you remain dissatisfied, you may make a complaint to the Information Commissioner and ask him to investigate whether the GLA has complied with the provisions of the Environmental Information Regulations 2004 in respect of your request for information.

You can contact the Information Commissioner at the following address:

*Information Commissioner's Office  
Wycliffe House Water Lane*

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<sup>3</sup> [What powers does the Mayor have for planning applications? | London City Hall](#)

<sup>4</sup> [fer0663603.pdf \(ico.org.uk\)](#)

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*Wilmslow SK9 5AF*

<http://www.ico.org.uk/complaints>

Yours sincerely

**Paul Robinson**  
**Information Governance Officer**



Your Ref: 2021/0265/S3

Our Ref: 20/01347/FUL



**Att:** [REDACTED]  
Special Projects, Planning  
The Planning Team  
Greater London Authority

By email only

23/12/21

**BY EMAIL ONLY**

[REDACTED],

**Site address: 20-24 Pope's Road, London, SW9 8JB**

Thank you for your consultation letter, received on 26 November 2021, in respect of the planning application (reference 20/01347/FUL) by AG Hondo Popes Road BV for the following development:

*"Demolition of existing building and erection of part 5, part 9 and part 20-storey building with flexible A1 (shops)/ A3 (restaurants and cafes) / B1 (business) / D1 (non-residential institutions) / D2 (assembly and leisure) uses at basement, ground floor and first floor levels, with restaurant (Class A3) use at eighth floor level and business accommodation (Class B1) at second to nineteenth floor levels, with plant enclosures at roof level and associated cycle parking, servicing and enabling works"*

Please accept the following comments from the London Borough of Lambeth regarding the scheme.

**Background**

The application proposes a mixed use building (part 5, part 9 and part 20 storey) providing office space, retail shops/ restaurants and leisure uses, and improvements to the public realm.

Following a comprehensive assessment of the proposal, the application was considered by the Council's Planning Applications Committee ("PAC") on 3 November 2020. The PAC supported the officer recommendation of approval and resolved to grant planning permission subject to conditions as well as planning obligations to be secured through a s106 planning deed.

**Development Management  
Planning, Transport and Development**  
London Borough of Lambeth  
PO Box 734, Winchester, SO23 5DG

Telephone: 020 7926 1180  
Facsimile: 020 7926 1171  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)



Lambeth's resolution to grant planning permission took account of the following planning benefits of the development:

- Economic opportunities – the creation of a new office floorspace ecosystem providing flexible office and workspace accommodation, including medium, small and micro workspaces for small creative and cultural businesses and start-ups. Alongside space for medium and larger commercial tenants - thereby creating the opportunity for smaller businesses to establish and grow within the building, whilst enabling cross-fertilisation with larger more established commercial tenants;
- Jobs – creation of approximately 1,600 on-site jobs across a range of sectors and additional jobs during construction and from associated resident and occupier expenditure locally; local employment and training initiatives; and the provision of affordable workspace;
- Community – the provision of dedicated community floorspace within the development and the use of the publicly accessible central space within the market by the community to host events.
- Transport – investment in local public transport infrastructure, including contributions towards improving Brixton Rail Station; providing additional bus services in the area; improving cycle parking in the town centre; improvements to signage and walking/cycling routes
- Public Realm – the delivery of a new public square on Pope's Road to support a range of uses and to create a multi-functional, inclusive, useable public space;
- Public facilities – the provision of new and expanded public toilets within the development to replace the existing dated block in Popes Road.

Lambeth has agreed the following planning obligations with the applicant to secure these benefits:

#### Employment & Skills Endowment Strategy

An employment and skills strategy applying to construction and the completed development to provide support and opportunities for vocational training including apprenticeships, to promote higher level qualifications and careers for Lambeth residents including young people. This includes a £150,000 upfront payment, plus annual indexed-linked payments of £75,000 for 25 years, with overage provision to increase this amount should revenue increase above an agreed level (this equates to c. £1.875m and significantly exceeds the policy requirement). Providing job and skills training including apprenticeships for local people.

#### Affordable Workspace Strategy

12.5% of the new office space is to be let at levels averaging 50% below market rate for 25 years (this is the period that was agreed at the time of the Lambeth planning committee in November 2020) with provisions requiring support for local businesses and users.

#### Public Realm Improvements

Enhancement of Popes Road public space to be delivered by the applicants prior to the first occupation of the scheme, including ongoing maintenance payments to Lambeth as the Local Highways Authority (totalling £279,000 over 25 years).

#### Community Use

Provision of community space (196 sqm NIA) with funding for a Community Coordinator role (£80,000) for use by local charity, voluntary sector and community groups.

#### Public Toilets

New public toilet facilities at Popes Road.

#### Public Art

Contribution of £80,000 towards public art.

#### Cycle Hire

Contribution of £220,000 towards cycle hire docking and membership.

#### Signage

Contribution of £15,000 towards signage for wayfinding.

#### Active Travel

Contribution of £300,000 to enable investment in pedestrian and cycling infrastructure in the locality

#### Brixton Station

Contribution of £300,000 towards improvements to Brixton railway station

#### Bus Services

Contribution of £450,000 towards improvements to local bus services

Since the Lambeth PAC decision, officers of the Council have continued to negotiate the detailed drafting of the S106 agreement with Hondo in order to secure the above obligations, as decreed within the HoTs that were agreed by the Lambeth PAC resolution and with regard to legal compliance under Regulation 122 of the Community Infrastructure Levy Regulations 2010. At the time of writing the draft S106 agreement has reached an advanced stage and has now been shared with the GLA's appointed legal team.

#### **GLA Call-in**

On 1 March 2021, the Mayor of London notified Lambeth that he would act as the local planning authority for the purposes of determining the planning application (under article 7 of the Mayor of London Order and the powers conferred by Section 2A of the 1990 Town and Country Planning Act). As such, officers of the Greater London Authority are to prepare a representation report to be considered by the Mayor at a forthcoming Representation Hearing (date to be confirmed).

## **Amended Planning Application**

Since the Mayor's decision to call-in the application for his own consideration, the GLA officers have been in discussion with the applicants to test assumptions around the height and massing of the proposals and their impact on prominent local views, and to consider the planning balance achieved by the scheme in respect of the level of public benefits that can be delivered. These discussions have led to further enhancements of the public benefits package in three respects, as set out below, but have not resulted in revisions to the scale, massing or design of the scheme from that considered by the Lambeth PAC. The three areas of enhanced benefits are:

- Affordable Workspace
- Brixton Job Training Fund
- Employment and Skills

### **Affordable Workspace**

The applicant proposes to increase the duration of the affordable workspace period to 2090 to match the term of the applicant's lease with Network Rail (the freeholder of the site). A period of 25 years had originally been agreed with the Council, as is required by the now adopted Lambeth Local Plan.

### **Brixton Job Training Fund**

The applicant proposes a new Brixton Job training fund of £1,000,000 (£40,000 per annum for 25 years) in addition to the employment and skills endowment fund agreed with the Council. The new training fund will be focused on Coldharbour Ward and will include direct allocations that invest in employment and skills training which will target employment prospects for local youth from Black, Asian and Minority Ethnic communities, arising directly from the development and the surrounding regeneration of Brixton.

### **Employment and Skills**

The applicant proposes that in addition to the number of apprenticeships already agreed with the Council, that they will provide an additional 50% of apprenticeship opportunities in the completed development, with the additional apprenticeships to be targeted specifically for Black, Asian and Minority Ethnic communities. It is proposed to link in with companies like the Black Seed Fund who can help to provide access to these employment opportunities with training to potentially include building management, community support/capacity building and affordable workspace roles.

## **New Local Planning Policy Context**

Since the PAC resolution to grant planning permission for the development, the Council has adopted a new local plan, the Lambeth Local Plan 2020-2035 (adopted 22 September 2021). This new plan, along with the London Plan, comprises the Development Plan for the area, and it replaces the previous local plan (Lambeth Local Plan 2015).

The new Lambeth Local Plan, along with the London Plan, continues to provide strong support for the proposal. Key land use policies which support the development from the new plan are discussed below.

## Lambeth Local Plan (adopted September 2021)

Lambeth Local Plan 2021 ("LLP") policy ED1 (Offices) updates and modifies Lambeth Local Plan 2015 policy ED3 (Large Offices). LLP policy ED1 supports large offices in Brixton town centre and this remains unchanged from the approach of 2015 policy. Of relevance to the Hondo scheme and new to the LLP are clauses (f) – (h) in relation to the provision of flexible workspace suitable for micro, small and medium-sized enterprises, in accordance with London Plan policy ED2.

The LLP also includes new policy on affordable workspace which applies where there is an increase in office space on sites within the middle and north of the borough. In the case of the Popes Road proposals, this will apply to all the office space proposed. Policy ED2 A(iii) sets out the amount of affordable workspace required in the Brixton Creative Enterprise Zone (a key Development Plan designation for the area). As the Popes Road development provides more than 10,000sqm of new office floorspace, 10% of rentable floorspace (NIA) is required to be provided as affordable workspace for a period of 25 years at 50% discount of market rents. The proposal exceeds this requirement with 12.5% of the proposed office floorspace to be available as affordable workspace for a period of 90 years.

LLP policy PN3 E states that applications within the Creative Enterprise Zone ("CEZ") for development, including offices, will be supported where they; (i) maximise the amount of market, flexible, low-cost and affordable workspace suitable for creative and digital industries in accordance with LLP policies ED1 and ED2; (ii) provide a mix of workspace typologies for different types and sizes of businesses with a focus on start-up, incubator and 'grow-on' space for creative and digital industries that diversify and strengthen the sector; and (iii) provide space, such as meeting rooms and exhibition spaces, which promotes networking and information sharing between businesses and sectors within the creative and digital industries and that can be accessed by local community groups. The proposal satisfies these requirements with the floor space offering opportunities for a range of businesses including small businesses and start ups, with the associated planning obligations securing support for the affordable workspace and employment and skills training.

The LLP removes the Popes Road site from the primary shopping area and includes the site within the new Brixton CEZ. For the Popes Road site, the LLP policy PN3 and Site Allocation 16 apply with the preferred use being mixed-use development including retail, new workspace, food and drink, community, educational, leisure and recreation uses, possible market extension and associated uses. The proposed uses are consistent with these policies, and it is important to note that the Site Allocation for this site has been carried over from the previous Lambeth Local Plan (2015).

Policy ED7 on town centres remains largely unchanged from the 2015 policy, however new clause F states that in accordance with London Plan policy E9, major development proposals should provide an appropriate mix of unit sizes. The proposal achieves this with various commercial opportunities provided from small market stalls to large office spaces.

Policy Q26 Tall Buildings has also been revised in the current LLP, compared with the previous adopted Local Plan from 2015. The new adopted policy identifies locations for tall buildings as required by Policy D9 of the London Plan 2021. In the LLP a tall building in the middle and north of the borough is defined as being of greater than 45m in height. Whilst the LLP identifies the adjacent site to the north of Brixton Station Road (subject to Site Allocation 15) and the International House

site as both being appropriate locations for tall buildings (Locations B2 and B1 respectively in the LLP); the application site at Popes Road between the viaducts is not identified as a tall building location within the Local Plan. This approach remains consistent with the extant Site Allocation (Site 16) which applies to the site between the viaducts. Lambeth identified the proposals as a departure from adopted Lambeth Local Plan Policy Q26 and site allocation 'Site 16' of the 2015 Lambeth Local Plan when considering the application at the PAC in November 2020. As explained above, the Site 16 site allocation is unchanged in the new LLP and therefore there continues to be a departure from aspects of this policy as before. Whilst the Tall Building policy Q26 has been updated in the new LLP, given that the application site is not identified as a location for a tall building it is considered that the proposals depart from this element of the new LLP Q26 policy also.

The departure from elements of the 2015 LLP, along with the identification of less than substantial harm to certain local heritage assets, was very thoroughly considered by the Lambeth PAC in November 2020; and it was concluded that having had regard to National, Regional and Local Policy, and to other material considerations, that the public benefits of the application scheme outweighed the departure from policy and the less than substantial harm identified. Having regard to the updated policy context, and additionally taking into account the further strengthening of the public benefits package since the November 2020 PAC, Lambeth continue to consider that an appropriate planning balance is achieved by this scheme.

## **Conclusion**

Lambeth continues to support the proposed development. It will deliver an extensive range of benefits with the new office space, retail, community, and leisure uses creating new business and employment opportunities. The development would help address the undersupply of workspace within the town centre, and provide space for existing and new businesses to establish and grow within Brixton, whilst creating an eco-system whereby larger and medium sized employers are also attracted and mutual benefits can be achieved through co-existence with small vibrant SMEs. The extensive employment support packages, with targeted apprenticeship and training opportunities for local and under-represented communities, are a very important aspect of these proposals which are fully aligned with the Council's Economic Resilience Strategy and the Mayor's economic strategies for London. The creation of around 1600 jobs at the site will also generate extra footfall and spending which will support both the day and night-time economies within the local area. The creation of new small retail units will complement the adjacent indoor market and provide good opportunities for new and existing small businesses.

Other benefits include provision of floor space for community uses in the building that would be available for local groups. This space will be managed by a group of community representatives tasked with ensuring productive use of the space and to promote activities in public areas that help to reflect and celebrate Brixton's cultural heritage.

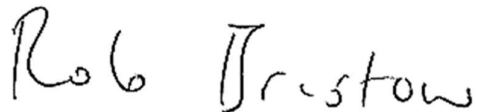
The proposals will also enable significant investment in active travel infrastructure locally, in bus provision, and will contribute towards the much needed upgrading of Brixton's Network Rail station. The proposals will deliver a new public square on Popes Road in front of the site, creating a multi-purpose space and a new focal point for the town centre.

Whilst Lambeth remain of the view that the extensive package of benefits that were negotiated up to the November 2020 PAC meeting were sufficient to outweigh the departure from certain aspects of policy and the less than substantial harm to local heritage assets; the additional enhancements

negotiated by the GLA are considered to strengthen further the social and economic contribution of the proposals particularly and are welcomed in further enhancing the planning balance in favour of the scheme.

Overall, the social, economic and environmental benefits of the scheme are considered to be significant. The scheme accords with the Council's Borough Plan objectives and with the Mayor's London Plan and post-Covid recovery strategies for the city; and constitutes sustainable development. Lambeth look forward to the opportunity to re-affirm and expand on these points as may be required at the upcoming Mayoral hearing.

Yours sincerely,

A handwritten signature in black ink that reads "Rob Bristow". The signature is written in a cursive, slightly informal style.

**Rob Bristow**  
**Director – Planning, Transport and Sustainability**  
Sustainable Growth and Opportunity  
Direct Line: [REDACTED]  
[REDACTED]@lambeth.gov.uk