

# GREATER LONDON AUTHORITY

Our reference: MGLA070622-2567

Date: 21 June 2022

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 5 June 2022. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

*We are writing further to our email of the 29th May (see below) and your recent advice confirming our entitlement to access and receive the documentation requested. 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 1<sup>st</sup> 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.*

- i. 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:*
- ii. A copy of the officer's report (in draft form or otherwise) prepared for the Representation Hearing planned for the 10th June 2022*
- iii. 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*
- iv. 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*
- v. Copies of correspondence between the Mayor's office and Historic England*

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

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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.*

You also stated that you were happy to receive "information in a piecemeal fashion". Therefore, please attached the requests to speak and accompanying statements. Please note that speaker requests/notes have not been received from the Council and the applicant.

The names of members of staff and speaker requests are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Personal data is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

The London Review Panel report is now available at [London Review Panel Reports | London City Hall](#).

Please note that two key letters within the scope of your request are also available at: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/poppe-road-public-hearing>

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA070622-2567.

**Information Governance Officer**

# GREATER**LONDON**AUTHORITY

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 May 2022 23:53  
**To:** Mayor of London; [REDACTED] John Finlayson; Popes Road  
**Subject:** 20-24 POPES ROAD (GLA Stage 3 ref: 2021/0265) - ADDENDUM - Environment (objecting)  
**Attachments:** Energy Addendum 220523.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Mayor, [REDACTED] and John Finlayson

*In relation to the above planning application please find attached an addendum to my previous written representations (last one sent on the 4th of February). This responds to the applicants latest published documents and concerns Carbon Emissions, BREEAM compliance, Whole Life Cycle Carbon and Urban Greening.*

*I kindly request that the issues raised in this document are taken into consideration when you are preparing the case officer's report for the upcoming public hearing.*

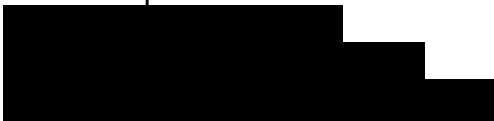
*Please acknowledge receipt of this email.*

*Many thanks*

[REDACTED]

**Review of Popes Road impact on  
Carbon emissions,  
BREEAM compliance,  
Whole life-cycle carbon  
and  
Urban greening**

Written representation submitted by:



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# 1. Introduction

This report presents a systematic review of the environmental performance of the proposed Popes Road development. In the following sections it addresses carbon emissions, BREEAM compliance, whole life-cycle carbon assessments, and finally urban greening.

As part of the review of carbon emissions a number of spreadsheet models were developed in order to assess the claims reported in the planning application. During this process it became clear that there are a number of inconsistencies in the data as presented.

Despite these inconsistencies, which are identified throughout this document, a clear picture emerges of a building design that falls well behind comparable contemporary developments in London.

A key observation is that the proposed design should benefit from its form factor, which in essence a large box with large volume relative to surface area, meaning it should be expected to perform well in regard to heating demand. However the modelled building performs considerably worse than the baseline and basic measures such as mitigating cold bridges, are not included in the design.

Conversely cooling demand is naturally high in glass clad buildings but this has been greatly exacerbated by the lack of passive measures, for example, balcony shading or passive ventilation.

Another key observation is that the carbon emissions calculations, have significantly benefited from recent changes to the grid carbon emission factors, as opposed to being the result of an efficiently designed building.

In summary the design, as presented, has a number of fundamental shortcomings, but these have been, in part, masked by active measures namely air source heat pumps, which in turn have benefited from the reduction in emission reduction factors. There is no evidence of a well-integrated design and little use of passive measures, contrary to the spirit of 'lean, clean, green' objectives.

The following sections substantiate the above assertions and demonstrate that:

- As designed, this **major development falls well short of achieving net zero-carbon**, contrary to London Plan policy SI 2A and 2B.
- Although the applicant claims that the **regulated carbon emissions will exceed the 35%** reduction beyond Part L baseline stipulated in London Plan policy SI 2C for major development, this is not fully evidenced as there are omissions and irregularities with input assumptions and calculations that call into question the reported results.
- There is no evidence that the applicant has attempted to minimise **unregulated** emissions, which far exceed the regulated emissions. This is contrary to London Plan policy SI 2E.
- As designed, the proposed development is only set to achieve a **BREEAM** rating of 'Very Good', which is insufficient to comply with Lambeth policy EN4.
- The **Whole Life Cycle** Assessment produced by the applicant only recently is incomplete and inaccurate. It therefore does not demonstrate that it would meet GLA benchmarks.
- The proposed development would only achieve a **Carbon Heroes** rating of E for embodied carbon which is the third worst of the 7 ratings.
- The evidence does not support the case for achieving an **Urban Greening** Factor of 0.3.

**Given the above, as it stands, the design of the proposed development fails to comply with London Plan policies SI 2A, SI 2B, SI 2C, SI 2E and G5 and neither does it comply with Lambeth Plan policy EN4.**

Failing to meet these basic policy requirements also implies that the design of the building cannot be regarded as meeting the standard of 'Excellence'- a requirement for the design of tall buildings under London Plan policy D9 C 1) and Lambeth Plan policy Q26 a) iii).

## 2. Carbon Emissions

### 2.1 The Net Zero-Carbon objective

Policy SI 2 A of the London Plan published on 2 March 2021 states that:

*“Major development should be net zero-carbon.”*

And paragraph 9.2.4 of policy SI 2 states that (emphasis added):

*“A zero-carbon target for major residential developments has been in place for London since October 2016 and applies to **major non-residential developments on final publication of this Plan.**”*

A major development in the London Plan is defined as follows:

- *“Development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more;”*
- *“Development of **other uses**, where the floor space is **1,000 square metres or more**, or the site area is 1 hectare or more.”*

As the GIA floorspace of the proposed development is in excess of 26,000 sqm, there is no doubt that this a major development and therefore should be designed to net zero-carbon standards.

### 2.2 The GLA 3 Tier Hierarchy- 'be lean, be clean, be green'

London plan policy SI 2 B states that (emphasis added) :

*“A minimum on-site reduction of at least **35 per cent** beyond Building Regulations is required for **major development**. Residential development should achieve 10 per cent, and **non-residential development should achieve 15 per cent through energy efficiency measures.**”*

Paragraph 4.8 of the applicant's Addendum Energy Statement Dec 2021 reports the outputs from modelling the 'baseline' TER and each of the 3 tier stages, based on SAP10 carbon factors in the tables below:

Overall	Carbon Dioxide Emissions (tCO <sub>2</sub> /yr)		
	Regulated	Unregulated	Total
Building Regulations Part L 2013 Compliant Development (TER)	346.8	286.7	633.5
Be lean: Savings from energy demand reduction	272.1	286.7	558.8
Be clean: Savings from heat network	272.1	286.7	558.8
Be green: Savings from renewable energy	210.5	286.7	497.1

Table 15: Summary of regulated and unregulated CO<sub>2</sub> emissions savings for the commercial element of the proposed development

Savings from:	Regulated carbon dioxide savings	
	Tonnes CO <sub>2</sub> per annum	(%)
Be lean: Savings from energy demand reduction	74.7	21.5%
Be clean: Savings from heat network	0.0	0.0%
Be green: Savings from renewable energy	61.7	17.8%
<b>Total cumulative savings</b>	<b>136.4</b>	<b>39.3%</b>

Table 16: Summary of CO<sub>2</sub> emissions savings for each stage of the hierarchy for the commercial elements of the proposed development



Total cumulative savings as reported of only 136.4tCO<sub>2</sub> pa resulting in 210.5 tCO<sub>2</sub> pa regulated carbon emissions demonstrates that this major development will not achieve net zero-carbon on site contrary to London Plan policy SI 2A.

These figures also appear to show that whereas in March 2020 the scheme only achieved a 19% reduction in carbon emissions after the 'be lean' stage and a 31.5% reduction in carbon emissions from baseline after the 'be green' stage, it now achieves 21.5% and 39.3% reductions respectively. It therefore appears to show that the scheme now complies with London Plan policy SI 2C, whereas previously it did not.

However, the following sections will reveal that a significant number of the input assumptions used to produce these most recent figures are highly questionable, some data appears to have been omitted and there are unexplained anomalies in the figures reported compared to the data provided.

## 2.3 Emissions modelling

### 2.3.1 Fabric and glazing specifications

The table below is an extract from applicant's Dec 2021 Energy Statement which lists the target U-values of the building elements, the target g-value for glazing, plus the target air permeability and thermal bridging statistics.

Element		Target and proposed Fabric Targets		
		Maximum Building Regulation Part L 2A 2013	Proposed Building	Percentage improvement over Building Regulations Part L
External Wall	U-value (W/m <sup>2</sup> .k)	0.35	0.18	48%
Basement Wall	U-value (W/m <sup>2</sup> .k)	0.35	0.18	48%
Ground Floor	U-value (W/m <sup>2</sup> .k)	0.25	0.15	65%
Roof	U-value (W/m <sup>2</sup> .k)	0.25	0.12	52%
Windows (including frame and losses)	U-value (W/m <sup>2</sup> .k)	2.20	1.40	36%
	g-value	-	0.37	
Air Permeability	(m <sup>3</sup> /h.m <sup>2</sup> @50Pa)	10.00	3.50	65%
Thermal Bridging allowance	-	-	10% degradation of U-value	

Table 5: Target Fabric and Glazing Specifications

The applicant has also provided Building Regulations UK Part L (BRUKL) output reports based on the IES modelling for both the 'be lean' and 'be green' stages as designed in March 2020 and also as at Dec 2021.

Both the 'be lean' and 'be green' BRUKL reports for Dec 2021 confirm that the modelled design can achieve the target U-values for walls, roof and windows, but the 'be green' BRUKL output report for Dec 2021 shows that the modelled design will only achieve 0.16 rather than the target 0.15 U-value for the ground floor stated in the applicant's energy statement. Clearly, the greater the u-value, the greater the heat loss through the element and the greater the resulting carbon emissions.

Similarly in March 2020, the applicant's energy statement reported the target U-value for the ground floor as 0.15 whereas the BRUKL output report confirmed that the modelled design could only achieve an area weighted U-value of 1.07 with a maximum of 1.47- **well in excess of the Part L2 U-value limiting value of 0.25.**

**Both reports are misleading as they state that U-value targets are achievable, when the BRUKL model output data confirms otherwise.**

A reduction in the U-value from 1.07 to 0.15 for the ground floor would clearly have had a dramatic effect on the 'be lean' carbon emission figures, but the applicant's latest **energy statement does not describe any changes to the design of the ground floor that might demonstrate how this improvement has been achieved.**

There are virtually no external walls in the building above ground level because the intervals between structural columns on the north and south elevations are occupied almost entirely by full height windows. The east and west elevations consist of glazed curtain walling. Essentially **the basic design of the building is a concrete and steel frame in-filled with glass**. Page 151 of the design and access statement clearly shows that the concrete floors will be expressed on the outside of the building's facade.

#### 4.10 DETAILING

When experienced from proximity, the building reveals a refined and rich level of detailing. Several architectural details present in the surrounding built environment were used as starting point for the design of the proposed facades.

Window heads, continuous lintels, intricate brickwork and industrial facades with large openings were each reinterpreted in a contemporary design that combines context with innovation.

In detailing the facades, materials often come together to provide a unique combination of colours and textures. Variation in the articulation of the modules, in combination with the use of different depths, generates plays of light and shadow that emphasize the diverse detailing across the scheme.



Fig. 4.10.1 Window on Electric Avenue

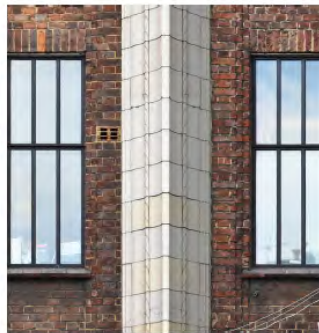


Fig. 4.10.2 Corner of Vales building facade detail



Fig. 4.10.3 Window on Viring Street



Fig. 4.10.4 West Block South Facade detail view



Fig. 4.10.5 West Facade detail view



Fig. 4.10.6 East Block South Facade detail view

30-34A PORTER ROAD, DESIGN AND ACCESS STATEMENT MARCH 2020

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This type of design for structure and fabric lends itself to **thermal bridging weaknesses**, but there is no explanation of how these weaknesses will be overcome. It is suggested therefore that the assumed standard allowance of **10% for thermal bridging is unrealistic**, particularly since these details occur repetitively throughout the building.

With regard to **air permeability**, the target value is reported as 3.5 m<sup>3</sup>/m<sup>2</sup> hour and the BRUKL report confirms that the modelled design achieves this. However, the BRUKL output report appears to state a baseline (worst acceptable) air permeability of 10 m<sup>3</sup>/m<sup>2</sup>hour whereas Table 5 of Building Regulations Part L2A 2013 and Table 3 of the NCM Modelling guide 2013 (buildings other than dwellings) prescribes a value of 3 m<sup>3</sup>/m<sup>2</sup>hour for the notional building where it's GIA is above 10,000 sqm. This implies firstly that the modelled **design does not meet the 2013 Building Regulations** and secondly that the building as designed, is being compared to a **baseline model whose air permeability is artificially high**.

**This would have the effect of artificially raising the heating demand (and hence the carbon emissions) for the baseline (TER) model and therefore inflating the performance of the BER figures against which it is being compared to determine compliance with London Plan policy.**

## 2.3.2 Building Services

Appendix D of the applicant's energy statement Dec 2021 is a table that sets out the energy input data to the BRUKL modelling using the IES interface. This is reproduced at Appendix A to this document. This data is broken down into units/areas as follows:

- East Offices
- West Offices
- Office showers/lockers
- Office WC
- Office circulation, lobby, corridor, stairs
- Office Bike Store\*
- Office Plant Room\*
- Office reception
- Retail units
- Retail circulation\*

However, those areas asterisked above do not appear in the BRUKL output results for Building service efficiencies, which indicates that **these areas have not been modelled** despite the fact that they are supplied with services such as panel heaters, hot water and ventilation.

**Furthermore, the assumptions in the modelling appear to be at odds with the specification of the air sourced heat pump (ASHP) unit.** The applicant's energy model input table shows the Seasonal Co-efficient of Performance (SCOP) figures for the heating provided by the Air Source Heat Pump as follows:

- |                          |       |
|--------------------------|-------|
| • East Block             | 3.36% |
| • West Block             | 3.23% |
| • Office Showers/lockers | 2.0%  |
| • Office reception       | 3.3%  |
| • Retail units           | 2.5%  |

However, the ASHP data sheet provided by the applicant in Jan 2022 is for the Mitsubishi 'i-FX-Q2-G05/XL-CA/0802' unit (see Appendix B) states that its maximum COP is 2.5% ,when providing 100% of the heating load and the applicant states at cell C16 (17/11/20) of the Stage 3 consultation Energy Memo that (emphasis added):

*“a. Based on the BRUKL output, the estimated heating and cooling demand for the building is 96.61MJ/m2 and they have confirmed the estimated heating and cooling energy consumption by the heat pumps. **The heat pumps will cover 100% of the site heat loads** (there is no other heat source proposed).”*

**Therefore, it is clear that for the East and West Block offices and office reception areas (making up over 88% of the GIA of the building) the heating efficiency ratios assumed in the modelling were higher (better) than the heating efficiency ratios that can actually be achieved by the proposed ASHP system.**

Likewise the applicant's energy model input table confirms the Energy Efficient Ratio (EER) figures assumed in the modelling as follows:

- |                          |      |
|--------------------------|------|
| • East Block             | 3.19 |
| • West Block             | 2.9  |
| • Office Showers/lockers | 3.2  |
| • Office reception       | 3.19 |
| • Retail units           | 3.2  |

However, the Mitsubishi 'i-FX-Q2-G05/XL-CA/0802' data sheet states that its maximum EER is 2.92, when meeting 100% of the cooling load and lower if not.

Therefore, it is clear that for all areas other than the West Block offices, offices, the cooling energy efficiency ratio assumed in the modelling was higher (better) than the cooling energy efficiency ratio of the proposed ASHP system.

### 2.3.3 Methodology

The GLA Energy Assessment Guidance (April 2020) states that:

*“5.6. Applicants using SAP 10.0 emission factors should continue to use the current Building Regulations methodology for estimating energy performance against Part L 2013 requirements (as outlined in Section 6), but with the outputs manually converted for the SAP 10.0 emission factors<sup>11</sup>. A spreadsheet has been developed for this purpose which applicants should provide as part of their energy assessment<sup>12</sup>. This spreadsheet should be used to record the estimated carbon performance of the development using SAP 10.0 and SAP 2012 emission factors to allow for a robust assessment of performance against the new emission factors and comparison against the old emission factors.”*

Contrary to these guidelines, the GLA Carbon Emissions Reporting Spreadsheet (CERS) which contains the SAP assessments was not provided by the applicant as part of their energy assessment (either in Mar 2020 or Dec 2021). Nor was it issued as part of the Stage 3 re-consultation in Jan 2021.

These have however been recently obtained via an Environmental Information Request (EIR).

The table below summarises the inputs values in the applicants CERS and calculates the results using the formulae provided in the GLA CERS template<sup>1</sup> for both SAP 2012 and SAP10.

SAP2012	BRUKL	Area	Heating	Type	DHW	Type	Lighting	Aux	Cooling	renewables	Tot Gas	Tot Elec	gas factor	elec factor	SAP 2012	SAP 2012
	kgCO2/sqm	sqm	kWh/sqm		kWh/sqm		kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kgCO2/kWh	kgCO2/kWh	kgCO2	kgCO2
BASELINE	24.9	28139.6	4.42	Gas	5.8	Gas	22.26	12.45	9.11		10	43.82	0.216	0.519	702,086	7,020.9
BE LEAN	18.4	28139.6	7.64	Gas	4.76	Gas	9.13	12.63	5.69		12	27.45	0.216	0.519	476,261	4,762.6
BE GREEN	16.7	28139.6	2.51	Grid Elec	3.47	Grid Elec	9.13	12.85	5.61	-0.63	0	33.57	0.216	0.519	490,271	4,902.7
SAP 10.0	BRUKL	Area	Heating	Type of Water	Type	Lighting	Auxiliary	Cooling	renewables	Total Gas	Total Elec	gas factor	elec factor	SAP10	SAP10	
	kgCO2/sqm	sqm	kWh/sqm		kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kWh/sqm	kgCO2/kWh	kgCO2/kWh	kgCO2	kgCO2	
BASELINE	24.9	28139.6	4.42	Gas	5.8	Gas	22.26	12.45	9.11	10	43.82	0.21	0.233	347,700	3,477.0	
BE LEAN	18.4	28139.6	7.64	Gas	4.76	Gas	9.13	12.63	5.69	12	27.45	0.21	0.233	253,252	2,532.5	
BE GREEN	16.7	28139.6	2.51	Grid Elec	3.47	Grid Elec	9.13	12.85	5.61	-0.63	0	32.94	0.21	0.233	215,972	2,159.7
Note: reported as 30																

Note: reported as 30

As per the applicant's input figures, the energy consumptions per square metre by end use for heating, hot water, lighting, auxiliary and cooling systems correspond to the BRUKL output report figures and the energy produced per square metre from renewable technology (the PV panels) also corresponds to the same figure in the BRUKL output report.

These values are then summed according to energy source (gas and electric) multiplied by the appropriate carbon factor, added together and then multiplied by the GIA to arrive at a total carbon emissions figure for baseline, be lean and be green stages. This arithmetic corresponds with the formulae provided in the GLA template. **However there are some unexplained anomalies between the applicants reported figures and this arithmetic.**

Firstly, looking at the figures based on SAP10 carbon emission factors, it is evident that the total consumption of energy for services that are supplied by electricity does not tally with the sum of the individual components -i.e. a total of 30 was reported in the CERS (see extract below), whereas the sum of electricity supplied services is in fact  $9.13+12.63+5.69=27.45$  per sqm.

<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>



.a.) 'BE LEAN' BER - SOURCE: BRUKL OUTPUT				REGULATED ENERGY CONSUMPTION E	
	Lighting (kWh/m <sup>2</sup> p.a.)	Auxiliary (kWh/m <sup>2</sup> p.a.)	Cooling (kWh/m <sup>2</sup> p.a.)	Natural Gas	Grid Electricity
				0.216 kgCO <sub>2</sub> /kWh	0.519 kgCO <sub>2</sub> /kWh
	9.13	12.63	5.69	12	30

Secondly, comparing the carbon emissions reported by the applicant to those calculated arithmetically using the GLA formulae, it can be seen that **these figures do not tally either**.

This comparison is illustrated below:

SAP10	as reported	as calculated	Difference	as reported	as calculated
	kgCO <sub>2</sub>	kgCO <sub>2</sub>	kgCO <sub>2</sub>		
BASELINE	346,838	347,700	(862)		
BE LEAN	272,150	253,252	18,898	21.5%	27.2%
BE GREEN	210,469	215,972	(5,503)	39.3%	37.9%

The calculated figures after 'be lean' measures are in fact better than reported, **but the calculated figures after 'be green' measures are slightly worse than the reported figures**.

It can also be seen that using SAP 2012 carbon emission factors, the application only achieves a 30% reduction in carbon emissions compared to baseline. This is because the carbon factor for electricity has reduced from 0.519 to 0.233, effectively halving the amount that electrically sourced energy contributes to carbons emissions now versus in 2012/2013.

There are also unexplained anomalies with the BRUKL output reports for Dec 2021 as reproduced below.

Pope's Road - Planning GREEN RT	As designed	Pope's Road - Planning LEAN R2	As designed
Date: Fri Dec 10 16:39:48 2021		Date: Fri Dec 10 15:23:43 2021	
<b>Administrative information</b>		<b>Administrative information</b>	
<b>Building Details</b> Address: Brixton, London, SW9		<b>Building Details</b> Address: Brixton, London, SW9	
<b>Certification tool</b> Calculation engine: Apache Calculation engine version: 7.0.13 Interface to calculation engine: IES Virtual Environment Interface to calculation engine version: 7.0.13 BRUKL compliance check version: v5.5.b.0		<b>Certification tool</b> Calculation engine: Apache Calculation engine version: 7.0.13 Interface to calculation engine: IES Virtual Environment Interface to calculation engine version: 7.0.13 BRUKL compliance check version: v5.5.b.0	
<b>Certifier details</b> Name: Hurley Palmer Flatt Telephone number: 02074293333 Address: 240 Blackfriars Road, London, SE1 8NW		<b>Certifier details</b> Name: Hurley Palmer Flatt Telephone number: 02074293333 Address: 240 Blackfriars Road, London, SE1 8NW	
<b>Criterion 1: The calculated CO<sub>2</sub> emission rate for the building must not exceed the target</b>		<b>Criterion 1: The calculated CO<sub>2</sub> emission rate for the building must not exceed the target</b>	
CO <sub>2</sub> emission rate from the notional building, kgCO <sub>2</sub> /m <sup>2</sup> .annum		CO <sub>2</sub> emission rate from the notional building, kgCO <sub>2</sub> /m <sup>2</sup> .annum	
Target CO <sub>2</sub> emission rate (TER), kgCO <sub>2</sub> /m <sup>2</sup> .annum		Target CO <sub>2</sub> emission rate (TER), kgCO <sub>2</sub> /m <sup>2</sup> .annum	
Building CO <sub>2</sub> emission rate (BER), kgCO <sub>2</sub> /m <sup>2</sup> .annum		Building CO <sub>2</sub> emission rate (BER), kgCO <sub>2</sub> /m <sup>2</sup> .annum	
Are emissions from the building less than or equal to the target?		Are emissions from the building less than or equal to the target?	
Are as built details the same as used in the BER calculations?		Are as built details the same as used in the BER calculations?	

The baseline (TER) figures in the 'be lean' and 'be green' reports differ by 24.9- 24.1 =0.8kg CO<sub>2</sub>/sqm which equates to a difference in carbon emissions of 0.8 x 28,139.50 = 22,512 kg CO<sub>2</sub> or 22.5 t CO<sub>2</sub>. The figure reported in the SAP assessments is 24.9 kgCO<sub>2</sub>/sqm

In addition, the 'be lean' BRUKL output report for Dec 2021 shows the area of the building as 28,139.50 for both actual and baseline (notional) models:

## Building Global Parameters

	Actual	Notional
Area [m <sup>2</sup> ]	28139.5	28139.5
External area [m <sup>2</sup> ]	21870	21870
Weather	LON	LON

Whereas 'be green' BRUKL output report for Dec 2021 shows the area of the actual building as 28,139.60 sqm compared to the area of the notional building as 28,139.50 sqm.

## Building Global Parameters

	Actual	Notional
Area [m <sup>2</sup> ]	28139.6	28139.5
External area [m <sup>2</sup> ]	21870	21870
Weather	LON	LON

The area used by the applicant in the SAP spreadsheets is 28,139.60sqm consistently for the baseline, 'be lean' and 'be green' figures.

Clearly if the actual energy consumption measured in kWh/sqm by end use category are based on a building that is slightly larger, these values will be relatively smaller (better) as input values to the SAP calculations.

## 2.3.4 Analysis of SAP assessments

Below is a table which presents the SAP10 figures in more detail.

SAP 10		Area sqm	consumption kWH/sqm	factor kgCO2/kWH	BASELINE kgCO2		BE LEAN kgCO2	BE GREEN kgCO2	+/- BE LEAN kgCO2	+/- BE GREEN kgCO2				
Heating												Heating	9,662	7%
BASELINE	gas	28139.6	4.42	0.210	26,119	8%								
BE LEAN	gas	28139.6	7.64	0.210			45,147		(19,028)	-20%				
BE GREEN	elec	28139.6	2.51	0.233				16,457		28,690	77%			
Hot Water												Hot Water	11,523	9%
BASELINE	gas	28139.6	5.80	0.210	34,274	10%								
BE LEAN	gas	28139.6	4.76	0.210			28,128		6,146	7%				
BE GREEN	elec	28139.6	3.47	0.233				22,751		5,377	14%			
Lighting												Lighting	86,087	65%
BASELINE	elec	28139.6	22.26	0.233	145,948	42%								
BE LEAN	elec	28139.6	9.13	0.233			59,861		86,087	91%				
BE GREEN	elec	28139.6	9.13	0.233				59,861		0	0%			
Auxillary												Auxillary	(2,623)	-2%
BASELINE	elec	28139.6	12.45	0.233	81,629	23%								
BE LEAN	elec	28139.6	12.63	0.233			82,809		(1,180)	-1%				
BE GREEN	elec	28139.6	12.85	0.233				84,251		(1,442)	-4%			
Cooling												Cooling	22,948	17%
BASELINE	elec	28139.6	9.11	0.233	59,730	17%								
BE LEAN	elec	28139.6	5.69	0.233			37,307		22,423	24%				
BE GREEN	elec	28139.6	5.61	0.233				36,782		525	1%			
Renewables		28139.6	-0.63	0.233	0	0%		(4,131)		4,131	11%	Renewables	4,131	3%
TOTALS					347,700	100%	253,252	215,972	94,448	100%	37,280	100%		
+/-							94,448	37,280						
%reduction							27%	38%						

The following considers each of the end use categories in turn.

### Heating

The SAP10 figures for heating show that the TER Baseline (B Regs compliant) figure for consumption per sqm is 4.42 kWh but the BER ('as designed') figure after 'be lean' measures is 7.64 kWh. In other words, before taking into account the carbon emission factors for fuel type, **the proposed design once 'be lean' measures have been accounted for performs 72% worse than a scheme that would comply with Building Regulations. This indicates that in terms of passive thermal measures, the scheme is extremely inefficient** despite the fact that the U-values are better than Part L2A notional values.

The explanation for this is that the vast majority of the envelope of the building is glazed, whereas as the NCM Modelling Guide 2013 confirms, the baseline model would only have 40% of the exposed walls glazed (or 1.5m x full facade width, whichever is the lesser)<sup>2</sup>. This means that, as the proposed building loses heat through the vast expanse of windows, more heating will be required to keep the internal temperature comfortable than a building that complies with Building Regulations.

With the introduction of ASHP at the 'be green' stage, the carbon emission figures for heating clearly reduces considerably (down from 45,147 KgCO<sub>2</sub> to 16,457 kgCO<sub>2</sub>) but only because the ASHP uses less energy to provide this heat. In other words, **the thermal performance of the building is entirely dependent on technology rather than good thermal passive design**. As indicated above, the heating efficiency of the ASHP proposed is in any case worse than modelled.

## Cooling

The SAP10 figures shows that the TER baseline (B Regs compliant) figure for carbon emissions associated with cooling is 59,730 kg CO<sub>2</sub>, but after 'be lean' improvements this reduces down to 37,707 KgCO<sub>2</sub>. This is intuitively explained by the improved g-value for solar reflective glazing against part L2A table 5 figures (0.37 as opposed to 0.4) as this is applied over the vast surface areas of glazing that make up the building's external envelope.

But it can be seen that cooling consumption in kWh/sqm for both the baseline model and out turn 'as designed' model (without taking into account fuel type) are over twice the level of heating consumption in each case. The figures are respectively as follows:

	<u>Baseline</u>	<u>Be Green</u>
cooling	9.11	5.61
heating	4.42	2.51

So this is clearly a building with a much higher cooling demand than heating demand.

This is borne out by the figures in the HVAC systems performance table of the Dec 2021 'be green' BRUKL report (see below), where the cooling demand figures across various areas of the building, for both actual and notional models are generally of a completely different order (much higher) than the heating demand figures.

HVAC Systems Performance									
System Type	Heat dem MJ/m2	Cool dem MJ/m2	Heat con kWh/m2	Cool con kWh/m2	Aux con kWh/m2	Heat SSEF	Cool SSEER	Heat gen SEFF	Cool gen SEER
[ST] Fan coil systems, [HS] Heat pump (electric): air source, [HFT] Electricity, [CFT] Electricity									
Actual	23.5	81.4	2.1	6.3	13.8	3.16	3.61	3.36	4.62
Notional	18.2	154.3	2	11.3	14.3	2.56	3.79	-----	-----
[ST] Fan coil systems, [HS] Heat pump (electric): air source, [HFT] Electricity, [CFT] Electricity									
Actual	12.2	113.4	1.5	10.3	23.7	2.29	3.07	2.5	4
Notional	2.8	205.6	0.3	15.1	19.2	2.56	3.79	-----	-----
[ST] Fan coil systems, [HS] Heat pump (electric): air source, [HFT] Electricity, [CFT] Electricity									
Actual	28.9	84.3	2.6	6.7	14.4	3.04	3.48	3.23	4.45
Notional	17.3	153.9	1.9	11.3	14.5	2.56	3.79	-----	-----
[ST] Split or multi-split system, [HS] Heat pump (electric): air source, [HFT] Electricity, [CFT] Electricity									
Actual	0	780.1	0	90.6	8.2	1.96	2.39	2	3.2
Notional	0	288.1	0	21.1	2.3	2.56	3.79	-----	-----
[ST] Unflued radiant heater, [HS] Direct or storage electric heater, [HFT] Electricity, [CFT] Electricity									
Actual	14.1	0	4	0	10.1	0.08	0	1	0
Notional	6.1	0	2	0	22.9	0.86	0	-----	-----
[ST] Unflued radiant heater, [HS] Direct or storage electric heater, [HFT] Electricity, [CFT] Electricity									
Actual	34.2	0	9.7	0	0	0.98	0	1	0
Notional	24	0	7.7	0	0	0.86	0	-----	-----
[ST] Fan coil systems, [HS] Heat pump (electric): air source, [HFT] Electricity, [CFT] Electricity									
Actual	4.2	112.1	0.4	8.8	11.4	3.04	3.52	3.3	4.62
Notional	0	311.6	0	22.8	9.6	2.56	3.79	-----	-----
[ST] No Heating or Cooling									
Actual	0	0	0	0	0	0	0	0	0
Notional	0	0	0	0	0	0	0	-----	-----

<sup>2</sup> [https://www.uk-ncm.org.uk/filelibrary/NCM\\_Modelling\\_Guide\\_2013\\_Edition\\_20November2017.pdf](https://www.uk-ncm.org.uk/filelibrary/NCM_Modelling_Guide_2013_Edition_20November2017.pdf)

The relatively high level of cooling demand reflects the fact that both for the notional building and the actual building, the orientation and height of the building expose it to solar gains throughout the day and particularly during the summer months.

Although the HVAC systems performance table provides cooling demand figures per square metre for various areas of the building, an overall figure for **cooling demand is not provided in the GLA carbon emissions reporting spreadsheet, contrary to its guidelines.**

At page 13 of the Department for Business, Energy and Industrial Strategy's 'Cooling in the UK' publication Aug 2021<sup>3</sup>, it states that:

***"The largest energy consumption relating to cooling is found in the office sector which accounts for around half of the non-domestic energy consumption for cooling and humidification in the UK; most of this is private offices (accounting for 44.0% of total consumption)."***

The proposed development is clearly no exception to this.

#### Hot Water

The applicant's CERS report shows that the TER baseline (B Regs compliant) figure for carbon emissions is 34,274 CO<sub>2</sub>, and the BER ('as designed') figure for carbon emissions after 'be lean' improvements is 28,128 KgCO<sub>2</sub>. **As both figures assume gas as the fuel source of hot water provision, this improvement on baseline is unexplained.** The introduction of ASHP at the 'be green' stage explains the further reduction.

#### Lighting

It can be seen that 42% of all carbon emissions in the TER baseline (B Regs compliant) model are attributed to lighting consumption. This figure is 145,948 CO<sub>2</sub> and the BRUKL output report confirms that this is based on the Part L2A notional specification of 60 lumen/watt lamp efficacy.

The BER ('as designed') figure for carbon emissions after 'be lean' improvements is 59,681KgCO<sub>2</sub> reflecting the substantial use of lamps with 120 lumen/watt efficacy. This accounts for 91% of all carbon emission reductions from baseline after the 'be lean' stage.

No further reductions are achieved at the 'be green' stage as grid electricity is assumed throughout, but it can be seen that lamp efficacy still accounts for 86,087kg CO<sub>2</sub>, i.e. 86.1 tCO<sub>2</sub> of the total 136.4 tCO<sub>2</sub> reported reductions from Part L - **which is 65% of all carbon emissions reductions.**

It is not difficult to specify lamp efficiencies of the order of 120 lumens/watt as these are now widely available. The Building Regs Part L2A was published in 2013 and lighting technology has improved considerably since then. If lighting were taken out of the equation altogether, the carbon emissions reductions after 'be lean' would reduce to 4% and the carbon emissions reductions after 'be green' would reduce to 25%.

**In summary, not only is lighting by far the biggest contributor to energy usage in the building the scheme is heavily dependent on lighting efficiency in order to achieve compliance with the London Plan.**

#### Auxiliary

Consumption from auxiliary systems make up almost a quarter (23%) of the total carbon emissions for the baseline scheme, and is the second highest contributor by use type, but as designed the building performs worse than the baseline TER both after 'be lean' and 'be green' factors have been considered. The end-uses arising to this demand are not reported.

#### Renewables

The PV panels introduced contribute to reducing carbon emissions by 4,131 kgCO<sub>2</sub> and only make up 3% of the reductions from baseline.

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1019896/cooling-in-uk.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019896/cooling-in-uk.pdf)



## 2.4 "Be Seen"

Below is an extract from the applicant's 'be seen' spreadsheet which was issued as part of the re-consultation in Jan 2022.

+ SUPPLEMENTARY FILES AND UPCOMING REPORTING STAGES	
SUPPLEMENTARY FILES	
<b>Site Plan</b>	
Does the development have a site plan?	Yes *
What is the site plan filename?	DEC 2020 RECONSULT - DRAWINGS ADDENDUM PART *
<b>Best Practice Documents</b>	
Does the development have a predicted DEC?	No *
Is there a base building energy rating (in line with DFP)?	No *

It reveals that the development does not have a predicted DEC (Display Energy Certificate) or a base building energy rating in line with DFP (Design for Performance). **This is contrary to the Mayor's 'be seen' energy monitoring guidance document published in Sep 2021 (See pages 31 and 32). There is no mention made of the DEC targets or the DFP rating in the applicant's Dec 2021 'be seen' and metering strategy.**

## 2.5 Carbon Offset

Based on the figures reported by the applicant and with respect to regulated energy, tables 15 and 16 of the applicant's Addendum Energy Statement Dec 2021 reports that the total cumulative predicted improvement on the Building Regs Part L compliant 'baseline' scheme of 346.8 tCO<sub>2</sub> pa is 136.4t CO<sub>2</sub> pa.

This implies a carbon shortfall of  $346.8 - 136.4 = 210.4$  tCO<sub>2</sub> per annum for regulated energy.

Paragraph 9.2.8 of the London Plan suggests a £95/tonne offset payment per annum to cover the shortfall compared to Part L regulated energy consumption and the life of the building is estimated to be 60 yrs according to the applicant's Whole Life Cycle (WLC) assessment (see section 3 below).

That would imply a financial contribution of the order of  $£95 \times 210.4 = £19,988$  pa over 60 years - **£1,199,280**. However para 4.9 of the applicant's Addendum Energy Statement assumes a lifespan of 30 years instead of 60, and a carbon offset contribution of only **£599,838**.

In contrast to the applicant's Addendum Energy Statement Dec 2021, Table 1 of the applicant's 'Be Seen and Metering Strategy' (BS&MS) document produced by HPF consultants Dec 2021 (see below) reports a predicted carbon shortfall of 213 tCO<sub>2</sub>/sqm and an estimated carbon offset contribution of £607,854.

The planning stage predicted energy and carbon end uses, as predicted using the CIBSE TM54 methodology, and which is to be uploaded to the public 'Be Seen' planning portal are:

Item	Performance indicator
Grid electricity (kWh)	4,427,782
Gas consumption (kWh)	-
Other fuels consumption (kWh)	-
Energy generation (kWh)	17,728
Carbon Emissions (tCO <sub>2</sub> /m <sup>2</sup> )	1,028
Carbon Shortfall (tCO <sub>2</sub> /m <sup>2</sup> )	213
Estimated carbon offset (£)	607,854

Table 1: summary the 'Be Seen'

These figures are clearly erroneous because the figures below provided in the applicant's document entitled 'WED14106 Pope Road be \_seen\_spreadsheet' that accompanied the BS&MS documents state that 213tCO2 pa is the predicted carbon emissions for the entire building, not just one square metre.

## MAYOR OF LONDON

OVERALL PROGRESS		100%
CURRENT REPORTING STAGE ----->>		Planning *
Elec Generation, Gross (if applicable)	kWh/yr	0 *
Solar Thermal Generation (if applicable)	kWh/yr	0 *
Predicted Annual Carbon Emissions	tCO2/yr	0 *
<b>Non-Residential Elements of the development (Part L Calculation)</b>		
Predicted Annual Energy Use		Fill in all applicable fuels below
Annual Electricity Use	kWh/yr	933,102 *
Annual Gas Use	kWh/yr	0 *
Annual Oil Use (if applicable)	kWh/yr	0 *
Annual Biomass Use (if applicable)	kWh/yr	0 *
Annual District Htg Use (if applicable)	kWh/yr	0 *
Annual District Clg Use (if applicable)	kWh/yr	0 *
Elec Generation, Gross (if applicable)	kWh/yr	17,728 *
Solar Thermal Generation (if applicable)	kWh/yr	0 *
Predicted Annual Carbon Emissions	tCO2/yr	213 *
<b>Non-Residential Elements of the development (TMS4 Calculation)</b>		
Predicted Annual Energy Use		Fill in all applicable fuels below
Annual Electricity Use	kWh/yr	4,427,782 *
Annual Gas Use	kWh/yr	0 *
Annual Oil Use (if applicable)	kWh/yr	0 *
Annual Biomass Use (if applicable)	kWh/yr	0 *
Annual District Htg Use (if applicable)	kWh/yr	0 *
Annual District Clg Use (if applicable)	kWh/yr	0 *
Elec Generation, Gross (if applicable)	kWh/yr	17,728 *
Solar Thermal Generation (if applicable)	kWh/yr	0 *
Predicted Annual Carbon Emissions	tCO2/yr	1,028 *
<b>CARBON OFFSETTING</b>		
Predicted Carbon Shortfall (aligned with planning energy statement tCO2)		213 *
Total Committed Carbon Offset	£	607,854 *
<b>END</b>		

There is no explanation as to why this figure differs from the figure of 210.5 tCO2 pa reported in table 15 of the applicants Addendum Energy Statement Dec 2021; or any explanation of why the assumed lifespans are different and, as a consequence also the carbon shortfall contributions.

Furthermore, the applicants GLA carbon emissions reporting spreadsheet fails to include a figure for carbon offset price.

## 2.6 Unregulated Emissions

The applicants SAP assessments show that the unregulated emissions amount to 44kWh/sqm. Multiplying this by the SAP10 carbon factor for electricity of 0.233 and the floor area of 28,139.60 gives a total of 288.487kgCO2 pa, but the applicant reports this figure to be 286.7 tCO2 pa, or 286,700kgCO2 pa. So once again there is a discrepancy between the figures reported and the figures calculated from the input figures.

Regardless of this discrepancy, the unregulated emissions amount to at least 286.7 tCO2 pa compared to the regulated emissions of 210.5 tCO2 pa (as reported). So **unregulated emissions exceed the regulated emissions by more than another third.**

This is no surprise because unregulated energy includes external lighting, IT equipment and lifts and the use of the building and in particular its height is energy intensive in these respects- it has five lifts as well as two firefighting lifts.

**Neither of the applicant's Energy Statements describe an approach or an attempt to minimise unregulated emissions- contrary to London Plan policy SI 2 E.**

### 3. BREEAM compliance

It states in the Executive summary of the Addendum Energy Statement Dec 2021 that:

#### Related sustainability indicators:

- **BREEAM Excellent:** A pre-assessment review shows a proposed path to achieving certification

The pre-assessment review referred to was reported from page 69 onwards of the applicant's Sustainability Statement dated Mar 2020. At page 69 it states that:

#### 1.0 Scoring scenarios

Based on the pre-assessment workshop undertaken 4<sup>th</sup> October 2019, the following strategies were identified:

- Targeted – Credits confirmed achievable based on the project design and scope
- Potential – Potential credits to review further, requiring additional works/ appointments outside the current design and scope

On this basis, the following scores are considered achievable under each scenario:

Scenario	Score	BREEAM Rating
Targeted	66.57	Very Good
Potential	75.01	Excellent

Based on information received to date, the projected BREEAM score for Pope's Road Offices indicates that a 'Very Good' rating is likely to be achievable based on the current scope of works. An expansion of current scope, with associated additional cost/ work, could permit a potential rating of 'Excellent'.

This confirms that only a score of 'Very Good' is achievable based on the current design and scope, whereas a score of 'Excellent' could only potentially be achieved if the current scope were to be expanded with further work. This further scope/work has not materialised and therefore **the scheme as it stands is only set to achieve a BREEAM rating of 'Very Good'** which is not compliant with Lambeth policy EN4.

It states in the Introduction to the Addendum Energy Statement Dec 2021 that:

#### Key sustainability indicators also include:

- **BREEAM Excellent:**  
**'BREEAM 'Excellent rating' –** The current carbon savings prediction supports a 'BREEAM 'Excellent' in relation to credit 'Ene 01'.  
  
Please refer to BREEAM Pre Assessment, HDR, December 2019 for further details.

The following extract from the BREEAM credits and comments table of the applicant's pre-assessment review (P81 of the Sustainability Statement Mar 2020) clearly shows that the targeted and potential credit scores for category Ene 01 are only 4 in each case from a total of 13 credits available:

Ene 01	Reduction of energy use and carbon emissions	13	4	4	<u>Credit 1 – Energy Performance</u> HPF Energy Targeted, 4 credits, calculate an Energy Performance Ratio for New Construction. 4 credits minimum requirement for Excellent. Evidence at Design Stage - Building Regulations Output Document (BRUKL). <u>Credit 2 – Prediction of operational energy consumption</u> Additional Appointment. Energy Consultant Not Targeted, 4 credits, detailed energy modelling following the TM54 methodology to generate predicted operational energy consumption figures. Report energy consumption targets by end use, conduct a risk assessment to highlight design, technical and process risks. <u>Exemplary Level Credits 1-2 - Post Occupancy Stage</u> Additional Appointment. Energy Consultant Not Targeted, 2 credits, client or building occupier commits funds to pay for the post occupancy stage. This requires an assessor to be appointed and to report on the actual energy consumption compared with the targets set above. Submit the energy model to BRE and the building owner.
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The following extract from the BREEAM guide to Ene 01 category credits (reduction of energy use and carbon emissions) for new construction illustrates that a minimum score of **6 credits is required to achieve an 'excellent' rating, whereas the scheme is only targeting a maximum of 4.**



You are here: 6.0 Energy > Ene 01 Reduction of CO<sub>2</sub> emissions

## Ene 01 Reduction of emissions

Number of credits available	Minimum standards
15	Yes

### Aim

To recognise and encourage buildings designed to minimise operational energy demand, consumption and CO<sub>2</sub> emissions.

### Assessment Criteria

The following is required to demonstrate compliance:

1. Calculate an Energy Performance Ratio for New Constructions (EPR<sub>NC</sub>) using BREEAM's Ene 01 calculator.
2. The EPR<sub>NC</sub> calculation takes account of the following parameters:
  - a. the building's operational energy demand,
  - b. the building's primary energy consumption and
  - c. the total resulting CO<sub>2</sub> emissions.
- d. The calculation is determined using the following performance data from energy modelling of the building's specified/regulated fixed building services and fabric, as undertaken by an accredited energy assessor using approved building energy calculation software:
  - i. Building floor area (m<sup>2</sup>)
  - ii. Notional building energy demand (MJ/m<sup>2</sup>)
  - iii. Actual building energy demand (MJ/m<sup>2</sup>)
  - iv. Notional building energy consumption (kWh/m<sup>2</sup>)
  - v. Actual building energy consumption (kWh/m<sup>2</sup>)
  - vi. Target Emission Rate (kgCO<sub>2</sub>/m<sup>2</sup>)
  - vii. Building Emission Rate (kgCO<sub>2</sub>/m<sup>2</sup>)
3. Compare the EPR<sub>NC</sub> achieved with Table - 9 of benchmarks below and award the corresponding number of BREEAM credits.

Table - 9: Ene 01 EPR<sub>NC</sub> benchmark scale

BREEAM credits	EPR <sub>NC</sub>	Minimum requirements
1	0.06	Requires a performance improvement progressively better than the notional building level (as defined in the 2010 version of the Building Regulations, Part L2a).
2	0.12	
3	0.18	
4	0.24	
5	0.30	
6	0.36	BREEAM Excellent requires a minimum EPR <sub>NC</sub> of 0.36 (6 credits) and a 25% reduction in CO <sub>2</sub> emissions arising from regulated building energy consumption.
7	0.42	
8	0.48	
9	0.54	
10	0.60	
11	0.66	BREEAM Outstanding requires a minimum EPR <sub>NC</sub> of 0.60 (10 credits) and a 40% reduction in CO <sub>2</sub> emissions arising from regulated building energy consumption.
12	0.72	
13	0.78	

Therefore, the applicant's claim that a BREEAM Ene 01 rating of 'excellent' is supported by the pre-assessment is **false and thus misleading**.

The Ene 04 BREEAM rating (low carbon design), pre-assessment states that:

*Ene 04 Passive Design Analysis has been potentially targeted which entails an analysis of the building design/development to influence decisions during RIBA Stage 2 and identify opportunities for the implementation of passive design solutions to reduce demands for energy consuming building services. Low and Zero Carbon Technology has also been potentially targeted which entails a feasibility study is carried out by RIBA Stage 2 to establish the most appropriate low or zero carbon energy source(s) for the building/development.*

However the Ene 04 credit scores are zero out of an available 3 for both the target and the potential scenarios:

Ene 04	Low carbon design	3	0	0	<p><b>Credit 1 – Passive design</b>  Additional Appointment. Energy Modeller  Not Targeted. 1 credit, an analysis of the building design/development to influence decisions during RIBA Stage 2 and identify opportunities for the implementation of passive design solutions to reduce demands for energy consuming building services.  Evidence at Design Stage – modelling/ reporting and results.</p> <p><b>Credit 2 – Low and Zero Carbon Technologies</b>  Additional Appointment. Energy Modeller  Not Targeted. 1 credit, a feasibility study is carried out by RIBA Stage 2 to establish the most appropriate low or zero carbon energy source(s) for the building/development. An LZC technology must be specified.  Evidence at Design Stage – modelling/ reporting and results.</p> <p><b>Credit 3 – Freecooling</b>  Not Targeted. 1 credit, would require natural ventilation strategy.</p>
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The Policy EN4 of the Lambeth Plan states that:

*“Proposals should demonstrate .... that sustainable design standards are **integral to the design**, construction and operation of the development”*

This section has demonstrated the applicants claim of a scheme 'developed with sustainable design principles at its core' is misleading given that it is not achieving a single BREEAM credit score on low carbon design.

## 4. Whole life cycle carbon assessment

### 4.1 Assessment scope

In October 2020 the Mayor published a consultation draft of the Whole Life Cycle Carbon Assessments Guidance<sup>4</sup>.

Policy SI 2 F of the London Plan published on 2 March 2021. states that:

*“Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.”*

Despite the publication of the draft GLA guidance document and Intend to Publish London Plan, it was not until Dec 2021 that the Building elements applicant submitted a Whole Life Cycle Carbon assessment.

The GLA WLCA guidance states that:

*“3.4.4 In developing a WLC assessment for compliance with Policy SI 2, applicants should follow BS EN 15978 using the RICS PS [Royal Institute of Chartered Surveyors' Professional Statement] as the methodology for assessment. The rest of this section confirms various aspects of the RICS PS which are to be followed or where a different approach should be taken to comply with Policy SI 2.”*

It also states that:

*“3.5.2 A WLC assessment needs to cover the entirety of modules A, B, C and D to comply with Policy SI 2, rather than just the minimum requirements identified in the RICS PS.”*

### 4.2 Building elements

The RICS PS sets out four stages (A-D) in the life cycle of a building broken down into a series of modules under each stage. It also lists the building elements that a WLCA needs to consider under each of the modules.

Table 4 of the Applicants WLCA lists these groups as follows:

The table below lists the building elements included and excluded in the WLCA model:

Building Part/Element Group	Building element	Included / excluded
Demolition	0.1 Toxic/Hazardous/Contaminated Material treatment	N/A
	0.2 Major Demolition Works	N/A
0 - Facilitating works	0.3 & 0.5 Temporary enabling works	N/A
	0.4 Specialist groundworks	N/A

<sup>4</sup> [https://www.london.gov.uk/sites/default/files/wlc\\_guidance\\_consultation\\_version\\_oct\\_2020.pdf](https://www.london.gov.uk/sites/default/files/wlc_guidance_consultation_version_oct_2020.pdf)

1- Substructure	1.1 Substructure	Y
	2.1 Frame	Y
	2.2 Upper floors incl. balconies	Y
	2.3 Roof	Y
	2.4 Stairs and ramps	Y
	2.5 External walls	Y
	2.6 Windows and external doors	Y
	2.7 Internal walls and partitions	Y
	2.8 Internal doors	N
3 - Finishes	3.1 Wall finishes	N
	3.2 Floor finishes	N
	3.3 Ceiling finishes	N
4- Fittings, furnishings and equipment (FF&E)	4.1 FF&E	N
5 - Building services/MEP	5.1 – 5.4 Building services	Y
6 - Prefabricated Buildings and Building Units	6.1 Prefabricated buildings and building units	N/A
7 Work to Existing Building	7.1 Minor demolition and alteration works	N/A
8 - External works	8.1 Site preparation works	N
	8.2 Roads, paths, pavings and surfacings	Y
	8.3 Soft landscaping, planting and irrigation systems	N
	8.4 Fencing, railings and walls	N
	8.5 External fixtures	N
	8.6 External drainage	N
	8.7 External services	N
	8.8 Minor building works and ancillary buildings	N/A

Table 4 - Building elements included and excluded in the WLCA

It can be seen from this list that the following elements were either deemed not applicable or were not included in the modelling:

- Toxic/Hazardous/contaminated material treatment
- Major Demolition
- Temporary enabling works
- Specialist groundworks
- Internal Doors
- Wall finishes
- Floor finishes
- Ceiling finishes
- Fittings, furnishings and equipment
- Prefabricated buildings and building units
- Minor demolition and alteration works
- External Works
  - Site preparation works
  - Soft landscaping, planting and irrigation systems
  - Fencing, railings and walls
  - External fixtures
  - External drainage
  - External services

Appendix A of the applicant's WLCA is a spreadsheet that sets out the results of the one click LCA, i.e. the predicted carbon emissions that would be produced for each of the building elements across each module. It is divided up into 2 assessments: Assessment 1 assumes the current status of the electricity grid; Assessment 2 assumes a decarbonisation of the electricity grid.

This spreadsheet confirms that the **demolition** of the existing single storey shops that occupy the site currently has been **excluded** from the modelling and likewise the **temporary enabling works**, but it is clear that this work would generate considerable carbon emissions. The demolition and temporary enabling works phase of the construction works is detailed in the applicant's Construction Logistics Plan and includes the erection of scaffolding, hoarding, a demountable screen and a crusher together with site accommodation, all scheduled to take place over a 3 month period.

It is unclear whether specialist ground works have been included under the heading 'substructure' or been excluded from the WLC modelling altogether but the applicant's Substructure report clearly shows that deep piles and a retaining structure would be required due to the height of the building and its proximity to the railway viaducts on each side. In addition, it shows that waterproofing would be required to the basement.

Furthermore, the applicant's Drainage Strategy Mar 2020 indicates that it is likely that foul water from the WCs and showers in the basement would need to be pumped :

*"It is assumed that any foul water drainage from ground floor level and above will be drained by gravity in order to minimise the amount of pumping required. Until the levels of the existing connections and public sewers are confirmed it is unclear whether the basement level will need to be pumped although **this appears to be likely**. It is therefore recommended that an allowance is made at this stage for pumping foul water from below the basement level slab up to high level in the basement to allow discharge by gravity to the public sewer."*

NHBC standards<sup>5</sup> define finishes to include dry lining (plasterboard), plaster finishes, floor finishes and painting/decorating and yet wall, ceiling and floor finishes, making up an enormous surface area of a part 20, part 9 storey building of GIA over 28,000 sqm appear to have been excluded. Although the WLCA spreadsheet seems to include some finishes, it is not clear which finishes these are if they do not fall within the RICS definitions. Gypsum plaster and plasterboard are notoriously energy intensive to produce.

Fittings, furnishings and equipment have also been excluded from the WLCA, as confirmed by the spreadsheet, which should include the embodied energy required to produce, transport and install furniture, IT equipment, sanitary-ware etc.

In addition, as far as external works are concerned, the only elements included in the WLCA calculations are roads, paths, paving and surfacing. It excludes soft landscaping and planting (see later section), as well as external drainage and services. For example the transportation costs of bringing trees to site is missing. Another example is that no allowance is made for the 3 screens that would be required to mitigate the impacts of increased wind speeds created by the proposed development.

Turning to the life expectancy of the development and the anticipated life expectancy of the various building elements, the GLA WLC guidance states that:

*"3.5.3 ..... The reference study period (i.e. the assumed building life expectancy) for the purposes of the assessment is 60 years. Where the design life of the project exceeds or is less than 60 years, the assessment should still be done to 60 years but with an accompanying explanation of the life-cycle and end of life scenarios for the actual design life."*

The applicant's WLCA spreadsheet confirms that the life expectancy on which the modelling was based is 60yrs. No accompanying explanation is provided for a different lifespan which is notable as this is far in excess of the normal 25-30 year lifespan of a commercial building<sup>6</sup>. Notwithstanding this, the following extract from the applicant's WLCA spreadsheet indicates that the lifespan of most of the building's components would be less than 30 yrs and therefore replacement would be required to all elements except the substructure, and superstructure frame and upper floors.

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<sup>5</sup> <https://nhbc-standards.co.uk/9-finishes/9-2-wall-and-ceiling-finishes/>

<sup>6</sup> <https://www.ribaj.com/culture/lifespan#:~:text=But%20in%20the%20commercial%20sector,30%20years%20is%20the%20norm.>



MATERIAL QUANTITY AND END OF LIFE SCENARIOS		Product and Construction Stage (Module A)		Assumptions made with respect to maintenance, repair and replacement cycles (Module B)
Building element category		Material type	Material quantity (kg)	
Notes/example		Breakdown of material type in each category (Insert more lines if needed) e.g. Concrete		For all primary building systems (structure, substructure, envelope, MEP services, internal finishes)
		e.g. Reinforcement	65000 kg	
		e.g. Formwork	5000 kg	
			250 kg	
0.1	Demolition / Toxic/Hazardous/Contaminated Material Treatment			
0.2	Major Demolition Works			
0.3	Temporary Support to Adjacent Structures			
0.4	Specialist Ground Works			
1	Substructure		38,477,736 kg	80
2.1	Superstructure: Frame		7,310,797 kg	80
2.2	Superstructure: Upper Floors		12,040,876 kg	80
2.3	Superstructure: Roof		191,656 kg	30
2.4	Superstructure: Stairs and Ramps		625,893 kg	30
2.5	Superstructure: External Walls		3,432,373 kg	30
2.6	Superstructure: Windows and External Doors		238,470 kg	30
2.7	Superstructure: Internal Walls and Partitions		1,399,621 kg	30
2.8	Superstructure: Internal Doors		17,697 kg	20
3	Finishes		23,898 kg	15
4	Fittings, furnishings & equipment (FFE)		N/A	N/A
5	Services (MEP)		1,068,634 kg	20
6	Prefabricated Buildings and Building Units			
7	Work to Existing Building			
		Unclassified / Other	505,744 kg	
8	External works		1,938,670 kg	

## 4.3 Replacement

Zero carbon emissions have been allocated to the replacement in use of: stairs, ramps, internal/external walls windows, external doors and external works, none of which could be expected to be maintenance free for 60 years.

At page 22 of the RICS PS it states that (emphasis added):

***“It should be assumed that items are being replaced on a like-for-like basis and full replacement (100 per cent) of the items is assumed once the specified lifespan is reached.”***

However in the applicant's spreadsheet the module B4 figures for the roof, external walls, internal walls and partitions are all considerably less than the sum of the modules A1-A5 figures, demonstrating that **like for like replacement has not been assumed**.

Likewise for the sum of the modules A1-A5 figures (carbon emissions associated with the new MEP installation) is 2,316,955 whereas the module B4 (replacement) figure for the MEP is 3,455,797. But with an anticipated lifespan of only 20 years the MEP would need to be replaced twice during the lifespan of the building so there is an unaccounted for shortfall of  $4,633,910 - 3,455,797 = 1,178,113 \text{ kgCO}_2$ .

Repairs, maintenance, refurbishment and components

As per replacement, described above, the only non-zero module B3 figure (repairs in use) is for internal walls and partitions, meaning that no allowance has been made for repairs to any other elements of the building or services.

In addition, the figures for all building elements and services under modules B5 (refurbishment in use), B1 (components in use) and B2 (maintenance in use) are zero.

These are clearly unrealistic assumptions.

## 4.4 Repairs, maintenance and components

As per replacement, described above, the only non-zero module B3 figure (repairs in use) is for internal walls and partitions, meaning that no allowance has been made for repairs to any other elements of the building or services.

In addition, the figures for all building elements and services under modules B5 (refurbishment in use), B1 (components in use) and B2 (maintenance in use) are zero.

These are clearly unrealistic assumptions.

## 4.5 Reporting of the Modelling results

Furthermore, the reporting of the results of the modelling in the WLCA is inaccurate, it states that:

### 7.1 Whole Life Carbon – Current Electricity (SAP10)

The total Whole Life Carbon covering;

- Product Stage (A1-A3)
- Construction Process Stage (A4-A5)
- Usage Stage (B4-B7)
- End-of-Life Stage (C1-C4)

for the project is **1089 kg/CO<sub>2</sub>e/m<sup>2</sup>** as calculated using 'One Click' software (see Appendix A – Assessment 1).

However, RICS PS defines 'whole life carbon' as the sum of **all modules A-D**:

Term	Definition
Embodied carbon to practical completion [PC-CO <sub>2</sub> e]	Comprises stages [A1-A5]
Embodied carbon over the life cycle [LC-CO <sub>2</sub> e]	Comprises stages [A1-A5], [B1-B5] & [C1-C4]
Whole life carbon [WL-CO <sub>2</sub> e]	Comprises stages [A], [B] & [C], [D] to be reported separately

The applicant has omitted to include maintenance and repairs and module D in the figure reported.

The table below summarises the WLC spreadsheet for Assessment 1 and reconciles with those figures.

ASSESSMENT 1 (current grid)	Stage		GIA	kgCO <sub>2</sub> e	kgCO <sub>2</sub> e/sqm GIA	kgCO <sub>2</sub> e/sqm GIA
A1-A3	Product	materials	27390	13,756,987.00	502	502.00
A4	Construction	transport	27390	114,693.00	4	4.00
A5	Construction	installation	27390	377,427.00	14	14.00
B1	Use	components	27390	0.00	0	0.00
B2	Use	maintenance	27390	0.00	0	0.00
B3	Use	repairs	27390	905,676.00	33	33.00
B4	Use	replacementd	27390	3,534,038.00	129	129.00
B5	Use	refurbishment	27390	0.00	0	0.00
B6	Use	operational energy	27390	29,832,000.00	1,089	1,089.00
B7	Use	operational water use	27390	31.00	0	0.00
C1	End of Life	demolition	27390	153,232.00	6	6.00
C2	End of Life	transport	27390	[inc C1]	[inc C1]	
C3	End of Life	reuse/recycling	27390	[inc C1]	[inc C1]	
C4	End of Life	disposal	27390	[inc C1]	[inc C1]	
Total A-C				48,674,084.00	1,777.07	1,777.00
D				-2,218,467.00		-81.00

This table shows that the whole life carbon figure is in fact 1,777-81 =1696 kg/CO<sub>2</sub>e/sqm which is 55% more than the 1,089 reported by the applicant. Even if one was to total modules A1-5, B4-B7 and C1-C4 instead (as the applicant has done), this comes to 1,744 kg/CO<sub>2</sub>e/sqm, which is 60% more than the 1,089 reported.

Likewise the WLCA states that:

### 7.3 Total Embodied Carbon – SAP 10

The total embodied material carbon covering;

- Product Stage (A1-A3)
- Construction Process Stage (A4-A5)
- Usage Stage excluding operational energy (B4-B5)
- End-of-Life Stage (C1-C4)

for the project is 658 kg/CO<sub>2</sub>e/m<sup>2</sup> as calculated using 'One Click' software and shown in figure 5. One Click embodied carbon benchmarks for the proposed design shows in figure

The RICS PS states that total embodied carbon comprises the sum of carbon emissions for modules A1-A5, B1-B5 and C1-C4- ie the total of modules A-C less B5 and B6. However, from the table above it can be seen that this total is in fact 1,777-1,089= 688 kg/CO<sub>2</sub>/sqm . **Although this is a small difference it shows that errors have been made in the calculations and the reporting was inaccurate.**

The applicant reports that the development would achieve a **Carbon Heroes rating of E** for embodied carbon, this is **the third worst of the 7 ratings**. Moreover, as noted above, these figures do not include any allowance at all for the embodied carbon associated with demolition of the existing building, enabling works, wall finishes, ceiling finishes and floor finishes, FFE (?) and most of the external works. The significant amounts of embodied carbon associated with replacement, repairs, refurbishment and maintenance are also absent.

Although the total figure of 520 for embodied carbon emissions up to and including construction completion (modules A1-A5) is well within the GLA benchmarks, as noted above, the figures do not include demolition, enabling works, wall finishes, ceiling finishes and floor finishes, FFE and most of the external works.

The total figure for embodied carbon beyond construction phase (modules B and C, but excluding modules B6 and B7) is only 167 kg/CO<sub>2</sub>/sqm, and therefore well within the GLA benchmarks, but as noted above this does not include significant carbon emissions associated with replacement, repairs, refurbishment, maintenance and components. The only carbon emissions that are assumed to be associated with these modules relate to repairs to the internal walls and partitions.

**Clearly the WLC assessment is not accurate due to the significant number of omissions from the calculations and therefore compliance with the GLA benchmarks is not demonstrated.**

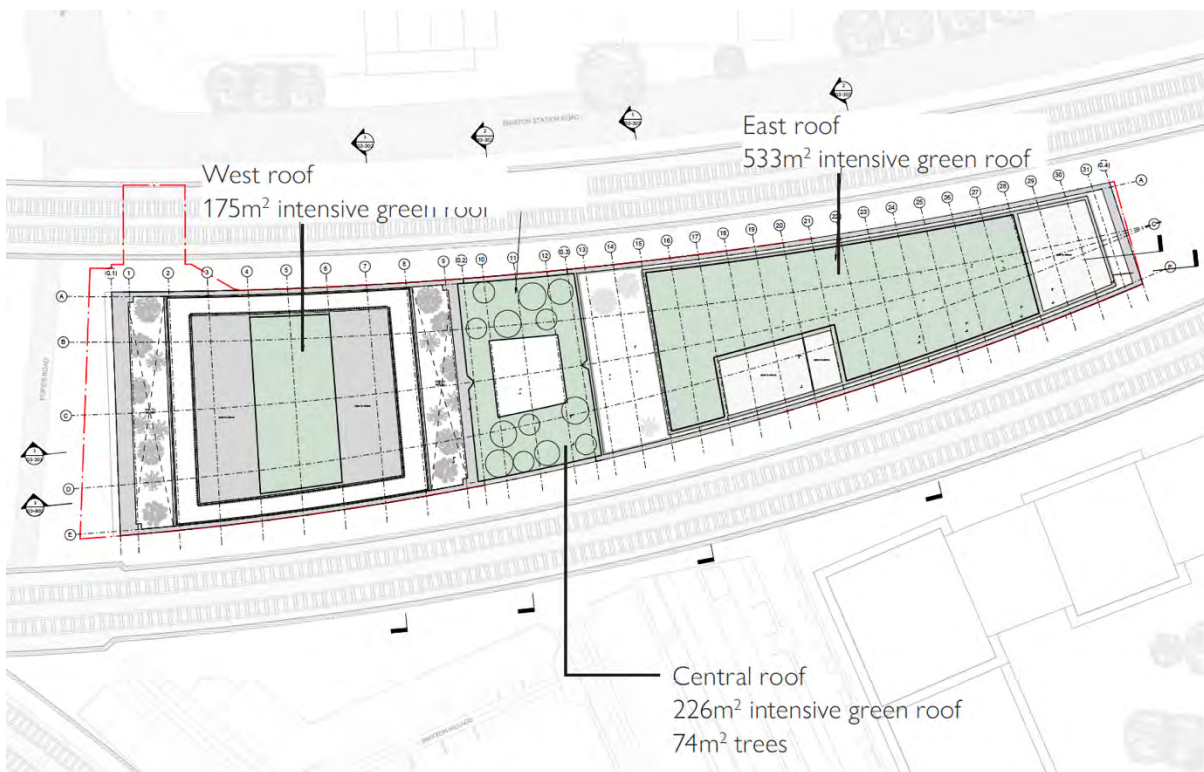
## 5. Urban greening

London Plan policy G5 part B states that (emphasis added):

*Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a **target score of 0.3 for predominately commercial development** (excluding B2 and B8 uses).*

The applicant's Urban Greening Factor (UGF) Statement dated Jan 2022, states that the scheme as of July 2020 only achieved an UGF of 0.09. Thus it is clear that this was not adequately considered in the initial design of the building. The document appears to have been produced as an afterthought in an attempt to comply with the new London Plan.

Previously 226 sqm of intensive green roof and 74 sqm of tree planting was proposed on the roof of the central 4 storey atrium. The current potential proposal is to increase the green roofing by 708 sqm, 175 sqm of which would be placed over the plant room to the 20 storey tower and 533 sqm of which would be placed on the roof to the east block- see extracts from the applicant's UGF statement below:



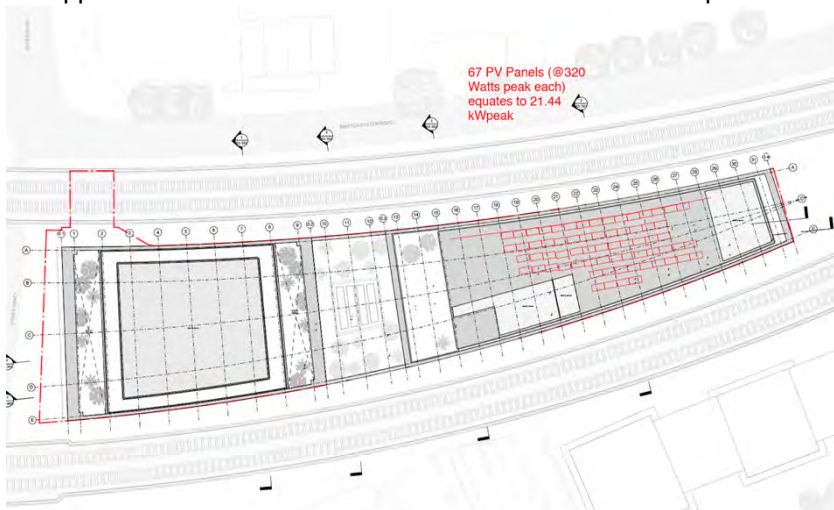


Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	0	0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	934	747.2	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	74	59.2	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	0	0	
Flower-rich perennial planting.	0.7	0	0	
Rain gardens and other vegetated sustainable drainage elements.	0.7	0	0	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	0	0	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	0	0	
Green wall –modular system or climbers rooted in soil.	0.6	0	0	
Groundcover planting.	0.5	0	0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	0	0	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	0	0	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	0	0	
<b>Total contribution</b>			<b>806.4</b>	
<b>Total site area (m²)</b>			<b>2573</b>	
<b>Urban Greening Factor</b>			<b>0.313408473</b>	

It can be seen from the GIA figures provided by the applicant below that the restaurant is 534 sqm.

Table 2.1: Revised Development Schedule		
Use Class	GIA	GEA
B1 Use Commercial Space	23,276sqm	25,041sqm
A1/A3 Markets	2,408sqm	2,530sqm
A3 Restaurant	534sqm	570sqm
D Use Community Space	197sqm	211sqm

It therefore follows that this green roofing would cover the entire east block roof apart from the plant rooms that are shown on the architect's drawings as being 'open to above'. However the PV roof plan submitted by the applicant in Jan 2022 shows that there would be 67 PV panels on the east block roof- see below.



The Stage 3 Energy Memo submitted by the applicant in Jan 2022 states in cell E15 that the PV panels would each have an area of 1.68 sqm -see below.

The original plantroom block layouts for all roofs are included and show that the west block roof is occupied by a double-stacked MEP equipment and unsuitable for PVs. A preliminary roof area of 240m<sup>2</sup> on the East Block has therefore been identified for the installation of solar PV panels as indicated in the attached roof plan. Below are calculations for potential energy generation of this space.

The following calculations are based on indicative figures and have not considered solar mapping studies to comprehensively explore feasibility of the PV array.

Proposed PV panel area = 1.68m<sup>2</sup> per panel

This means that  $67 \times 1.68 = 112.5$  sqm of the east block roof would be taken up with PV panels, so rather than the full 533 sqm of roof space being available for green roofing, only 420.44 sqm would be available unless the PV panels were either elevated or spaced further apart. Without such strategies (and these are not indicated in the applicant's report) the total UFG contribution would reduce to 716.4 and the UGF would reduce to  $714.6/2573 = 0.27$  i.e. below the 0.3 required to meet London Plan policy G5.

As it pertains to the 175sqm of green roof proposed on the west block, the architect's drawings also show that this plant roof is 'open to above', and that PV panels on this roof were considered unsuitable in the extract from the Stage 3 Energy Memo above. It is thus difficult to see how on the one hand PVs would not be feasible, but a green roof would be. If a green roof were not feasible on the west block, **this would reduce the UGF down to 0.22.**

## 6. Summary and Conclusion

As demonstrated above, the proposed development fails to comply with:

- London Plan policy SI 2A and 2B: this is a major development but is not designed to be net zero-carbon.
- London Plan Policy SI 2C: the claimed reductions beyond Part L baseline for regulated emissions of 21.5% ('be lean') and 39.3% ('be lean', 'be clean', 'be green') are not substantiated.
- London Plan policy SI 2E: no attempt has been made to reduce or minimise unregulated emissions.
- London Plan policy G5: the evidence indicates that a minimum Urban Greening Factor of 0.3 cannot be achieved by the introduction of measures proposed.
- Lambeth policy EN4C: a minimum of BREEAM 'Excellent' is not achievable with the current design.

In addition, the Whole Life Cycle Assessment produced by the applicant is incomplete and inaccurate. It therefore does not demonstrate that it would meet GLA benchmarks.

Failing to meet these basic policy requirements also implies that the design of the building cannot be possibly be regarded as meeting the standard of 'Excellence'- a requirement for the design of tall buildings under London Plan policy D9 C 1) and Lambeth Plan policy Q26 a) iii).

Based on the evidence, there is no doubt that, carbon emissions, energy efficiency and sustainability were not primary considerations in the design of the proposed development at the outset, contrary in addition to Lambeth policy EN4D, and these weaknesses are now revealed.

**For the reasons above, evidenced in detail in this report, we urge the Mayor to reject this application for a major development on environmental grounds alone.**

## 7. APPENDIX A

HDR

Hondo Pope's Road Addendum Energy Statement

## APPENDIX D. ENERGY MODEL INPUTS

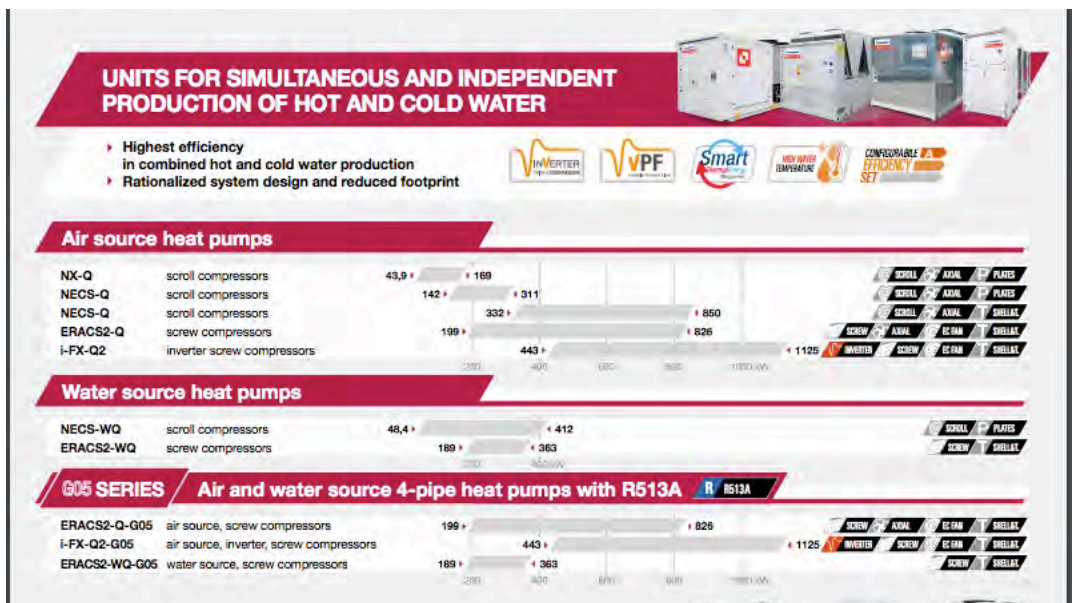
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December 2021 Page 59



## 8. APPENDIX B



TECHNICAL SELECTION - FH 14511 - EN 14825

**i-FX-Q2-G05 /XL-CA /0802**

Software version: ELCA World 1.4.2.0  
 Database version: 1.5.2.0  
 User: Daniel Hunt  
 Print date: 10/06/2020 14:43  
 Calculation type: EN 14511 - EN 14825

EUROVENT CERTIFIED PERFORMANCE  
 ErP 2021  
 HEATING  
 EC FAN  
 R513A

UNIT DESCRIPTION		
Code	i-FX-Q2-G05 /XL-CA /0802	
Version	XL-CA	
Size	0802	
INTEGRA unit for 4-pipe systems, air source, VSD screw compressors and EC fans, for outdoor installation		
Power supply	V/Ph/Hz	400/3/50
PERFORMANCE AT DESIGNED CONDITIONS		
RUNNING CONDITIONS		
CHILLED WATER HEAT EX. USER SIDE		
Fluid inlet temperature (cooling mode)	°C	12.00
Fluid outlet temperature (cooling mode)	°C	7.00
Fluid type	WATER	
Glycol	%	0
Fouling factor	m <sup>2</sup> /kW	0.000
WARM WATER HEAT EX. USER SIDE		
Fluid inlet temperature (heating mode)	°C	40.00
Fluid outlet temperature (heating mode)	°C	45.00
Fluid type	WATER	
Glycol	%	0
Fouling factor	m <sup>2</sup> /kW	0.000
OUTDOOR CONDITION		
Air temperature (cooling mode)	°C	35.0
Air temperature (heating mode)	°C	-4.0
COOLING (EN 14511)		
Cooling capacity	kW	740.7
Compressors power input	kW	236.9
Fans power input (cooling mode)	kW	9.60
Total power input	kW	253.7
EER	kW/kW	2.920
ESEER EN 14511 (refinement)	kW/kW	4.700
COOLING WITH HEAT RECOVERY (EN 14511 VALUE)		
Cooling capacity	kW	758.5
Recovery heat exchanger capacity	kW	951.2
Total power input	kW	230.3
TER	kW/kW	7.423
HEATING (EN14511)		
Total heating capacity	kW	491.9
Compressors power input (heating mode)	kW	186
Fan power input (heating mode)	kW	11.20
Total power input	kW	196.8
COP	kW/kW	2.500
SEER		
SEER Official (Reg. EU 2016/2281)		
Fan coil (12/7)		
Type climate	Average	
Temp. Plant side	Fan coil (12/7)	
Type flow	Fixed	
Type Temperature	Variable	
Prated,c	kW	741
T Design	35.00	
Qce	93940.02	
SEER	4.73	
Performance r/s	%	186

The performance shown are obtained from theoretical calculations and tolerances will apply.  
Rpt.version: 1.0.3.0

CLIMAVENETA

[REDACTED]

---

**From:** Save Nour [REDACTED]  
**Sent:** 27 May 2022 16:46  
**To:** Popes Road  
**Subject:** 20-24 Popes Road: request to speak and statement

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear GLA officers,

AFEWEE is a registered charity - founded in 1997 - based in Brixton Recreation Centre, a community empowered programme and a member of the Fight The Tower campaign. We work with local disadvantaged young people and we are determined to use sport as a way to change their lives for the better. Please have a look at our website : [www.afewee.org.uk](http://www.afewee.org.uk)

We wish to put a request to speak on the day of the public hearing **against Hondo Enterprise's planning application.**

Our objection is based on the harm this Tower will cause to Brixton's cultural heritage and the damage to our local communities especially our African/Caribbean communities.

The Hondo Tower will cause immeasurable damage to local grassroots organisations including AFEWEE of which we are founders and members.

The facilities provided by the Honda development are nowhere near what is needed by our local communities, especially our local youth, our small businesses and traders that will be priced out of Brixton.

Even though the Windrush Generation has made Brixton what it is today, we have been neglected, marginalised and priced out of the area we call home.

In addition to the above, we believe that we will not benefit from the Tower employment scheme and ultimately we will be offered only short term opportunities especially for our youth. No lucrative jobs will be offered to our communities; such initiatives have left local people often getting the lowest paid jobs such as security guards as already seen in Brixton Village.

We kindly request the GLA to allow our voices to be heard against the Hondo application on the day of the public hearing on the 10th of June 2022.

I, [REDACTED] will be able to join the public hearing in person and [REDACTED], our Secretary will be able to join on line (we can both speak and share time or in case [REDACTED] a [REDACTED] won't allow her to attend, I kindly request to speak the whole given time).

Thank you for your time and opportunity to give us a voice at this important hearing.

Looking forward to your response,

Kind regards,

Fight The Tower / Afewee registered charity

[Redacted signature block]

[Redacted signature block]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 23:51  
**To:** Popes Road  
**Subject:** 20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection  
**Attachments:** 20-24 Popes Road Revised Plan-[REDACTED] Dec 21.pdf; Hondo Tower - Local Consultation and Public Opposition .pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

## 20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection

Dear GLA Officers,

Following my previous email today, I wish to submit a request to speak at the Hearing on 10<sup>th</sup> June. I will be objecting to Hondo Enterprises' application for 20-24 Pope's Road, also known as the 'Hondo Tower.'

I will be speaking on behalf of the 'Fight the Tower' campaign, and as a lifelong Lambeth resident.

I submitted my written representations in collaboration with [REDACTED] another member of the FTT campaign.

I'd like to speak in person, and I'm happy to share my personal details.

I would like to cover points set out in these two submissions made previously, as follows. (Please see attached)

### 1.Local Consultation and Public Opinion (written representation -dated 4<sup>th</sup> Nov 2021)

Main points.

- The Hondo Tower' application is deeply unpopular locally, across a diverse spectrum of the population.
- 
- Many people remain unaware if the proposed tower and the Fight the Tower campaign have been working to inform local communities and hear their views on it. This includes people who are marginalised and digitally excluded.
- 
- The vast majority of responses to the **statutory consultation** opposed the planning application. These objections raised concerns about the harm to the cultural and historical heritage of Brixton that the development would cause.
-

- Hondo's own 'consultation' exercise was poorly advertised, received a low number of responses and failed to reach large sections of the community, including key local community and residents' groups.
- 
- We have argued that the information presented by Hondo about the proposed development was misleading at best. There is also no doubt that the survey questions they asked participants were 'loaded' (ie not unbiased.) Despite this the results showed that the vast majority of people who attended or responded online were against the plans.
- 
- This included concerns about the size of the building, questioning the need for commercial office space, as well as residents raising the issues of ongoing gentrification, the likely effect on rising rents and so on.
- 
- However, the consultants Lowick, and others connected with the application, have attempted to present these results as showing support for the application, when they show the opposite.
- 
- Meanwhile serious questions have been raised regarding the legitimacy of many of the comments and letters written in support of the Tower.
- 
- Questions were asked by at least one Lambeth PAC committee member, at PAC 1, as well as by Dulwich and West Norwood MP, Helen Hayes, at PAC 2, about whether sudden increases in support for the application, within very limited time periods, might have been artificially created.
- 
- 
- Furthermore, the applicant's chosen partners for the community floorspace consultation- i.e. the 'Brixton Project' also ultimately came out and made a public statement criticising the scheme.

### **Local Opposition**

- A concerted grassroots community campaign has gathered overwhelming evidence of local opposition to the tower. At the time these two written representations were submitted, a petition addressed to Lambeth council had reached 8,468 signatures, while a second petition, addressed to the London Mayor, stood at 4,956 objections.
- 
- As Fight the Tower campaigners, we collected nearly 2000 hand-written objections written by members of the local community in the form of postcards.

## **2.Response to the Revised Planning Application ( written representation- dated 13th Dec 2021)**

### **Main points.**

**Affordable workspace:** Hondo's 12.5% so-called affordable workspace in the tower would be charged at 50% of their full market rent. As this will be a high spec, high-cost building, it would still not be affordable to small businesses in Brixton.

The revised application offer does not increase the affordable workspace or reduce rental costs; it merely extended the length of time that it would be available. Modern office blocks tend to have a life span of 30 to 40 years. Hondo's offer was trivial, as the building would most likely not even last until 2090.

### **Community Space**

Meanwhile, 1% of the floor-space allocated for community use remained unchanged- in other words 221sqm- the size of approximately a three-bed apartment.

### **Employment**

Hondo's enhanced offers on employment, entry level jobs and apprenticeships are not within their gift .What's more, they were extremely limited, very thinly spread, and came about because they predicted that only 14% of positions in the development will go to Lambeth residents, let alone Brixton residents- lower than the 25% stipulated by Lambeth.

There were no real guarantees given by Hondo regarding employment either. For example, on apprenticeships, Hondo could only offer 'reasonable endeavours' to make sure that these would be provided.

The 'offer', as revised, will not result in any meaningful benefits to Brixton, and even if the 'offer' were improved, it would not offset the harm caused to Brixton's local economy, its small businesses and its heritage. Nor did the revised application diminish the risk that the tower could be converted into unaffordable private housing via Permitted Development Rights (PDR) if demand for this huge office space did not materialise.

Sincerely,

A solid black rectangular box used to redact a signature.

December 13<sup>th</sup> 2021

**Response to Revised Planning Application GLA stage 3 ref- 2021/0265**

**Submission to the Greater London Authority**

**Update to our first submission sent to the GLA on 4th November 2021 (attached):**

**'Hondo Tower - Local Consultation and Public Opposition'**

**Joint statement on behalf of 'Fight the Tower' submitted by:**

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

**GLA ref: Stage 1 - 2020/527**

**Stage 2 - 2020/6774**

**Stage 3 (called-in) - 2021/0265**

**Lambeth Planning Ref 20/01347/FUL 20-24 Pope's Road, Brixton**

**Two Lambeth Planning Application Committees considered this proposal:**

**PAC 1 - 25th August 2020 (decision deferred)**

**PAC2 - 3rd November 2020 (application approved)**

### **Objections to the revised application**

Hondo Enterprises have recently revised their planning application for their 20-storey office block in the heart of Brixton at 20-24 Pope's Road SW9.

These revisions were made public in November 2021.

The changes do nothing to address the height, the scale, the environmental impact, the transport implications, or the design of the Tower. The revisions only deal with two aspects of the application – **employment and affordable workspace:**

**Employment** – a) Funding for a Brixton job training fund of £40K pa for 25 years

b) increase in apprenticeship opportunities in the development from 26 to 39.

**Affordable workspace** - Increase in the term of affordable workspace to 2090 rather than 25 years from start of operational use.

**Employment:** According to Hondo's own figures, only 14% of jobs within the development would go to Lambeth residents, let alone to people from Brixton. (1) Lambeth policy requires 25% of local jobs and Hondo admit that this target is 'unachievable' because the office workforce would likely be commuting from outside of the borough. (1) Astonishingly, the shortfall amounts to 367 fewer local jobs than Lambeth stipulates.

This is clearly not a development aimed at tackling inequality. Hondo's financial contributions towards Employment and Skills would do little if anything to create enough local jobs and the money is spread over a 25-year period. Only £150,000 is being promised up front and Lambeth's admin costs would risk reducing these amounts further.

**Entry level jobs.** According to Lambeth, it costs £6,500 to help one unemployed person secure an entry level job and £26,000 to deliver an apprenticeship at level 2 and 3. Therefore £40,000 a year for a Brixton job training fund would only cover the cost of training 5 local unemployed people each year, or fewer than 2 apprenticeships.

**Apprenticeships.** The promise to add 13 apprenticeship opportunities to the 26 already required under Lambeth policy might sound well-intentioned but cannot be secured. Hondo say they would use 'reasonable endeavours' to encourage tenants to provide these, but ultimately it will be up to the tenants in the building to decide.

Construction projects such as this usually involve sub-contracting specialist multinational engineering firms and they are not obliged to provide meaningful employment to locals, even if the chosen contractor was willing to offer it. Hondo are not offering to increase support for unemployed people over and above the quota of 10 required by Lambeth policy.

**Affordable workspace:** Hondo's 12.5% so-called affordable workspace in the tower would be charged at 50% of their full market rent. As this will be a high spec, high cost building, it would still not be affordable to small businesses in Brixton.

The revised plan does not increase the amount of affordable workspace or reduce the rental costs; it only increases the length of time that it is available. Modern office blocks tend to have a life span of 30 to 40 years at best. Hondo's offer is trivial as the building will not last until 2090.

Within 30 years, the maintenance costs, service charges and the affordable rent are bound to increase.

Meanwhile, it's worth pointing out that the 1% of the floor-space allocated for community use remains unchanged- in other words 221sqm. This is the size of approximately a three-bed apartment.

**This revised development offers no meaningful benefits to Brixton.**

**In short: Hondo's plan for local employment is a failure before it has even started. There is no proven demand for costly office space in Brixton. Neither would Brixton benefit if the tower were to be converted into yet more unaffordable luxury flats.**



The revised offer goes no way towards reducing the harm the development would cause and is an attempt to bargain based on spurious promises. Even if Hondo were to increase their financial bid, this would have no impact on the damage the Tower would do to Brixton's heritage, culture, and local economy.

This development is a real, concrete threat to the area's heritage assets and local culture that led to the creation of the Brixton Conservation Area.

The revisions do nothing to address the height, the scale, the environmental impact, the transport implications, or the design of the Tower.

**Two to three years of construction would devastate local businesses and severely disrupt the lives of thousands of residents.**

**We urge the mayor to reject this planning application for the Hondo Tower.**

Brixton's communities need to recover from the effects of Covid-19, Brexit, and decades of gentrification and rising inequality.

We have the energy, the creativity, and the resilience within our communities to rebuild Brixton for the benefit of its residents and small businesses. We urge the GLA and Lambeth Council to allow this recovery process to start happening and to support it.

However, before Brixton can recover, we need to stop the Hondo Tower from going ahead. We are making the case that a 20-storey office block in the heart of Brixton is not wanted or needed and will be harmful to Brixton.

Signed

██████████ ██████████

██

December 13<sup>th</sup>, 2021

**GLA ref: Stage 1 - 2020/527**  
**Stage 2 - 2020/6774**  
**Stage 3 (called-in) - 2021/0265**

**Lambeth Planning Ref 20/01347/FUL 20-24 Pope's Road, Brixton**

**There were two Lambeth Planning Application Committees that considered this proposal:**

**PAC 1 - 25th August 2020 (decision deferred)**

**PAC2 - 3rd November 2020 (application approved)**

**Hondo Tower - Local Consultation and Public Opposition**

**Joint statement on behalf of 'Fight the Tower' submitted by:**

[REDACTED]  
[REDACTED]

**Submission to the Greater London Authority**

## **Introduction**

Hondo Enterprise's plan for 20-24 Pope's Road Brixton, involving the construction of a twenty-storey office block, would have a profound impact on the area's communities already reeling from the impact of the coronavirus crisis, austerity and Brexit.

Recognising the threat that this development poses to long-standing residents, the local community has expressed a huge level of opposition.

One of the reasons the Mayor of London rescinded his original Stage 2 decision on this planning application is that Lambeth Council didn't make all the written submissions available to the GLA. These submissions highlight the depth and scope of this opposition.

Throughout this written representation we shall demonstrate the depth and breadth of the opposition to this planning application within Brixton's communities and the failure of the consultation process to take this opposition into account.

We shall demonstrate that:

- The vast majority of responses to the statutory consultation opposed the planning application. These objections raised concerns about the harm to the cultural and historical heritage of Brixton that the development would cause
- The community consultation commissioned by Hondo Enterprises was flawed and inadequate. It also failed to accurately represent the scale and impacts of the development, and used misleading language.

- Of the limited numbers of people who participated in Hondo's community consultation, a majority were opposed to the Hondo Tower.
- There are serious questions to be raised regarding the legitimacy of many of the comments and letters written in support of the Tower.
- The applicant's chosen partners for the community floorspace consultation- i.e. Brixton Project, also ultimately came out and made a public statement criticising the scheme.
- A concerted grassroots community campaign has gathered overwhelming evidence of local opposition to the tower. A petition addressed to Lambeth council now stands at 8,468 signatures, while a second petition, addressed to the London Mayor, now stands at 4,956.
- As Fight the Tower campaigners, we have also collected nearly 2000 hand-written objections written by members of the local community in the form of postcards.

Furthermore, we will argue that the inability of the proposal to meet Brixton's needs directly contradict the London Recovery Programme's cross-cutting principles including "recognising and addressing structural inequalities" and "collaborating and involving London's diverse communities."

We would not argue that any part of London should be kept completely immune from change and development, but that those changes should be to the benefit of those communities who need help the most, and with their consent and participation.

We will focus **on 8 main areas**:

1. The Brixton Conservation Area, Black British History and Brixton's cultural heritage
2. The statutory consultation and concerns from councillors and MPs about possible 'astroturfing' by the developer
3. The pre-application community consultation carried out by Hondo Enterprises
4. Hondo's relationship with Brixton
5. The Brixton Project
6. The community campaign - petitions and public opposition.
7. Afterthoughts from the developers and photoshopped images of 'community'
8. Brixton's future and the Mayor's Recovery Programme

## Section 1. The Brixton Conservation Area, Black History and Brixton's Cultural Heritage.

The Brixton Conservation Area (BCA) was designated in 1980. The reasons for its designation included its importance as one of the few unspoiled examples of a Victorian town centre in London and its special significance in terms of Black British culture.

The BCA character appraisal 2012 recognises that Brixton is distinct from other areas of London, and the UK in general, in terms of its unique and distinctive cultural and historical importance. It states that (emphasis added):

*The great and varied mix of **cultures and communities** who live in and use Brixton is one of its **greatest defining features** and has a direct relationship with the physical character of the area*

*The street and covered markets are at Brixton's heart - they bring alive its historic townscape. The street markets include not only the stalls on Electric Avenue, Brixton Station Road and Popes Road but also the open fronted premises in the railway arches along Atlantic Road. **The market stalls / buildings themselves, the bustle of people, the noise and the music and wide variety of goods appealing to all tastes and budgets are an essential element in Brixton's rich character and cultural heritage. The markets are recognised through listing for their historic / cultural significance to the Afro-Caribbean community. They are also of economic importance as they provide opportunities for employment generation and small business development locally.***

Brixton's role in Black British history, the part played by the *Windrush Generation*, and the influence of Caribbean, African and Black British heritage can be seen in the area's vibrant cultural life, independent businesses and street markets.

Often described as 'the capital of Black Britain', Brixton's significance to the Black British struggle for acceptance in the UK has received worldwide recognition.

Recently, on 25<sup>th</sup> October, Dawn Butler MP made the following comment, after attending a Black History Month event at City Hall: "*Black History is London's History.*"

Nelson Mandela's visit in July 1996, as well as Mohammed Ali's visits in 1974 and 1999 are landmark occasions, while numerous Black British icons including Olive Morris, Darcus Howe, Linton Kwesi Johnson and others have been proud to call Brixton home.

This is what Historic England refers to as 'cultural heritage'. Protecting this cultural heritage is a huge concern of those locally who have objected to this proposed development, and who point out the threat it poses to the independent businesses and diverse communities who make Brixton unique. Black and minority-owned businesses have already been under threat for a number of years due to increased property prices which have forced many to close and have compelled some of the descendants of the Windrush Generation to relocate out of Brixton.

These concerns are voiced in comments by objectors on Lambeth's planning portal, for example:

*I object to this twenty-storey tower block being built in Brixton, this building will not represent the local community, it will be a gateway for more Shoreditch High Street-esque tower blocks and will mark an end to Brixton as we know it. As someone who has grown up in Brixton, watching the encroaching development of high-end businesses alongside the painful evictions of family-run businesses is beyond disheartening. (Appendix 20 -page 3/449)*

Many of the objections also focus on the need for small scale affordable work spaces and social housing, as opposed to what could become unused and unaffordable office space. Creating space for people living outside of Brixton to work, without accommodating the needs of Brixton's traditional communities would further weaken the community and make it further unviable for many who consider it to be their cultural home.

In conclusion, local opposition from the community has focused on the threat posed by the development to Brixton's cultural heritage - concerns that this development will accelerate the process of social and ethnic cleansing and uncontrolled 'gentrification,' along with increased prices for rent and basic necessities.

## **Section 2. The Statutory Consultation**

**2.1** The majority of representations made on this application on Lambeth's planning portal are objections (87.6% by November 2020). Meanwhile written representations in favour of the application prior to both PAC 1 and PAC 2 have raised questions in terms of their authenticity. These concerns were brought up at PAC 1 by a Lambeth ward councillor, Ben Kind, as well as Helen Hayes, the MP for Dulwich and West Norwood at PAC2 (see below).

**2.2** At the time of PAC 1, responses from the statutory consultation, carried out by Lambeth, were reported as follows:

***6.5.3. 999 local residents were consulted, 711 individual representations received during the consultation period, 4 were in support and 707 were in objection.***

The 2<sup>nd</sup> Addendum distributed prior to the meeting stated that:

***In total, 954 individual representations have been received to date of which 142 are in support and 807 are objecting to the proposal (ref 1).***

So, between the preparation of the officer's report for PAC1 and the 2<sup>nd</sup> addendum to that meeting, the number of supporters had increased by 35-fold.

At PAC1, Councillor Kind made these observations:

***Cllr Kind: "Again as I gave full notice about this question I just wanted to get an idea about the responses for consultation comments because officers have reported quite a significant increase in the number of supportive comments for this in a very short amount of time, the amount of objections having gone up as well but not as much- I'm just wondering if the officers have any sort of breakdown of perhaps who those supportive comments have come from, because obviously you know the***

*supportive and objecting comments have an impact but it would be sort of a shame if there was some sort of attempt to ...I don't know... **astroturf** or create some sort of an appearance that there was more support after it had been highlighted in the officers report that they'd only a handful of supportive comments."*

**Michael Cassidy (Lambeth's Principal Planning Officer):** *".... So, of the 142 support letters.... the majority of them are local addresses, there's a few that aren't but they're generally tied into people that work within the Brixton area and 31 of the 142 supports are from local traders within the markets"*

**Cllr Kind** *"Sorry Michael, is that 31 from traders within the market as in the markets that are run by the applicant or the markets more generally? "*

**Michael Cassidy** *"Err- the markets more generally"*

There was clearly some suspicion from this PAC committee member that the huge increase in support for the application within a very limited time period might have been artificially created.

**2.3** By the time of PAC2, Lambeth's 2<sup>nd</sup> Addendum, prepared for the PAC on 3rd November 2020, stated that the council had received:

2393 objections / submissions

1384 comments / submissions in support of the application (ref 2).

This total is made up of all comments received as letters, postcards and emails, added to the existing total of electronic comments recorded on the council's planning portal.

So, between the two PAC meetings, **there had been more than a 9-fold increase in the number of supporters of the application** - an increase from 142 to 1,384.

Brixton Buzz, a local on-line newspaper, reported on 5th Oct 2020 that representatives of Hondo were offering members of the public in Brixton pre-written 'model' letters in support of the application, to sign.

At PAC2 Helen Hayes (MP for Dulwich and West Norwood) spoke against the application and she also raised the issue of model letters:

*"...Finally, there is no widespread evidence of community support and I've been contacted by constituents distressed that they were persuaded to sign a model letter of support for the application in the street without details of the scheme, such as the height and appearance being explained to them...."*

In her written objection submitted to PAC 2, Helen Hayes MP raised the same concern:

*"I have also been contacted by constituents who have been stopped in the street by paid staff seeking support for this proposal, with a model letter to the Council. A number of these constituents were very distressed by this as the full details of the*



*scheme, including the height of the proposal were not fully explained..... I am concerned by these reports, and I urge the Council to consider model letters of support that it has received in the context of these reports.”*

We have now seen these model letters. They were submitted to the GLA by Lambeth council between December 2020 and January 2021 in their entirety.

(re-pdf scans of model letters- please note, these are large files and have proved temporarily difficult to share as a file or link-please get in touch regarding file sharing options. For 3 examples of model letters, please see footnotes p35-37)

## **2.4 Model letters**

There are three model letters in question. In the first one, respondents are asked whether they are a resident, market trader or business owner. Judging from where the redactions are placed, the vast majority of respondents apparently ticked ‘local resident.’

This first letter refers to a ‘bustling new market’ with ‘more options and more attractive spaces to enjoy food and drink’ .... ‘a fantastic new market space’.

The other two model letters are longer and have the same wording as each other. One is specifically addressed to Michael Cassidy at Lambeth Planning.

Crucially, we regard these model letters to be misleading and inaccurate in their content and therefore a clear attempt to garner support under false pretences.

**Firstly**, the model letters do not describe the height and scale of the building.

**Secondly**, these model letters refer to ‘2000 new workers spending money each working day.’ and ‘increasing the number of good quality jobs in Brixton’. This is at best misleading, as it could lead people to assume that these new jobs would be mostly for local residents.

In contrast, based on the figures provided by the Hondo commissioned Economic Impact Assessment published by Volterra in March 2020, this predicts no more than 16% of jobs created by the development would in fact go to Lambeth residents, let alone Brixton residents (ref 3).

Meanwhile, the population figures used by Volterra are based on the 2011 census and are therefore out of date.

## **2.5 Misleading Transport Projections**

According to table 7.3 of the applicant's Transport Assessment produced by Caneparo Associates in March 2020, 81% of commuting journeys would be by made public transport (train, bus or underground). Therefore approximately 1,050 additional workers are predicted to be travelling into Brixton from outside Lambeth by public transport.

However, the trip generation figures predict that overall, 863 additional morning peak time journeys would be generated by the development and 784 additional peak time journeys in

the evening would be generated. These projections don't add up. There is a large discrepancy between the predicted number of jobs created by the development and the number of trips generated by the development across all forms of transport.

This could be explained by the fact that the trip generation figures exclude leisure and restaurant staff, as well as the customers of these businesses who would theoretically be attracted to this development.

The above evidences the fact that not only were the trip generation figures understated but the model letter was also misleading.

If demand for office space was as high as the applicants claimed, and at pre-pandemic levels, then presumably demand for public transport would increase.

### **Loss of overground connectivity**

The reference to 'taking the pressure off public transport' also ignores the issue highlighted by \_\_\_\_\_ in PAC 2, that the siting of the tower would kill Brixton's hopes of a second overground railway station. This is because Pope's Road is the only possible location for this interchange, as outlined in the Steer Davies Gleave report commissioned by Lambeth, published in 2014 (ref 5).

For these reasons alone, we would argue that the applicant's figures underestimate and misrepresent the impact on public transport that the Hondo Tower would have.

In conclusion, members of the public were being encouraged to express unconditional support for the development, while being given inaccurate information about its potential impact and without being given an opportunity to consider any of the possible negative consequences it could have.

### **2.6 Hondo's 'Heat Map'**

The 2<sup>nd</sup> addendum for PAC 2, produced by Lambeth's Michael Cassidy, reported the following:

*7.3.6 'In relation to the 1,384 representations of support, the applicant submitted on 2nd and 3rd November 2020, a "heat map" analysis of the geographical location of the support letters received.... the applicant has stated that over 50% of the support responses have come from SW9 (namely the Pope's Road postcode)*

*...'However, it should be noted that Officers have not been able to verify the conclusions of the analysis provided.'*

It seems clear from the numbers given that the applicant would have used the model letters they had collected, as well as comments on the planning portal, as the basis for this 'Heat Map'. Since names and addresses are not displayed on the portal, the applicant would have needed access to this information from Lambeth's planning department. Is it possible that the applicant was given privileged access to this information to support the application?

## 2.7 Email objections

Of the 82 email comments on the scheme received by Lambeth Planning, all 82 were objections. Below is an example from 29/10/20 (ref 6).

- **My name is:**  
[REDACTED]
- **I am a local resident based at:**  
Lambeth
- **I object to the proposal on the basis of:**  
This tower is being imposed on the Brixton community against it's will - it is a blatant example of gentrification by an outside force with no regard for the area itself. Anyone can see that a new, non-descript 19-storey office block is completely at odds with the existing architecture, and it is clear, from the objections vastly outnumbering the supporting submissions, that this is not something anyone wants. Brixton has suffered enough from gentrification - it does no

## 2. 8 Comments on the Planning Portal - overwhelmingly opposed

According to the 2<sup>nd</sup> Addendum for PAC2, there were 2192 comments on the portal:

<b>Objecting</b>	1907	<b>Supporting</b>	271	<b>Other</b>	9
87.6% of respondents were opposed.				<b>Total</b>	2197

(Based on the figures given, the correct total of comments would in fact be 2187.)

**Meanwhile, of these 271 public comments on the planning portal in favour of the scheme, only 19 have any written comments /text attached. The remaining 252 are completely blank. (ref 7)**

Could it be noteworthy that this number of people had supported a planning application, without giving any reason whatsoever for doing so? By registering support but not making any argument in favour of the tower, these blank comments would do little to strengthen the case for it.

## 2.9 Examples of Objections on Lambeth's Planning Portal

In terms of the objections logged on the Lambeth planning portal, comments cover a broad range of issues, including loss of daylight, the height and dominance of the building, the alternative need for affordable housing, the negative environmental impact the building would have, problems with the design and the appearance of the building.

Many objectors also highlight concerns about gentrification and social and ethnic cleansing. Here is one example:

**(Objects) Comment submitted date: Mon 01 Mar 2021 (ref 7)**

‘Brixton is a beautiful, vibrant community. This development proposes to rip the heart out of our community and replace it with identikit, exclusionary private spaces, funded by hedge funds. This is everything that is wrong with Britain. Do the right thing, listen to the voices of the people, not the tiny minority who want to cash in.’

**Conclusion - Brixton residents and businesses have raised multiple concerns about the likely negative impacts of this development. Yet these were not originally communicated with the GLA and were not taken into consideration in the planning officers’ reports (PAC 1& 2) which appeared to brush over them. Instead, the officers’ reports preferred to focus overwhelmingly on the projected benefits the Hondo Tower would deliver.**

Meanwhile the questions raised by Helen Hayes MP and councillor Ben Kind about the sudden increase in comments in support of the application, and their authenticity/verification, remain unanswered.

### **Section 3. Pre-Application Community Consultation carried out by Hondo Enterprises**

**3.1.** A Statement of Community Involvement (SCI) on behalf of Hondo was published in March 2020 by the consultant company Lowick and submitted with the planning application. In the SCI report, Lowick describe themselves as a ‘political communications consultancy’. Their website describes them as ‘a communications consultancy advising on reputation and political risk.’

In the SCI, the developer lists 36 groups - ‘stakeholders’ and individuals it says it contacted as part of the consultation process (ref 8).

The list includes 4 Lambeth councillors, the GLA assembly member for Lambeth and Southwark, the MP for Dulwich and West Norwood, and 30 local groups and individuals.

The report does not state how many email invites were sent out to the organisations, politicians and local groups listed, but other forms of publicity seemed to concentrate on attracting Brixton Village and Market Row traders and users - the indoor markets that Hondo themselves own.

‘Stakeholders’ were said to have been offered ‘one to one’ meetings regarding the scheme.

However there does not appear to have been a good response to this approach.

Many of the groups listed did not participate in the consultation or give a view at any point, while other local groups were either not mentioned in the report, or say they were never contacted.

Lambeth's planning portal however features detailed objections made by some of these same groups listed by Lowick, including:

- a. Brixton Market Traders Federation
- b. St Matthew's Estate Tenants and Residents Association

Two other key groups also put in objections, but were not on Lowick's list. This is in spite of being users and residents of two of the buildings closest to the site. They are:

- c. Brixton Rec Users Group (BRUG)
- d. Carney Place & Milles Square Residents Association (Brixton Square)

**a. Concerns raised by the Brixton Market Traders Federation**

The objections raised by the Brixton Market Traders Federation were quoted in the officer's report for PAC 2, but were not quoted in full (see footnotes):

*At present the area from the Popes Road junction with Brixton Station Road through to the Popes Road junction with Atlantic Road is dominated by big structures. One end has two railway bridges, the other end one railway bridge. The supporting walls are high and create a feeling of domination and oppressive claustrophobia.... (continues)*

These comments draw together many key concerns i.e. height and mass of the building and the loss of daylight that the market would experience ( page 440/449 Appendice 20)

**b. Objection from St. Matthew's Estate Tenants and Residents Association (SMETRA) 30/10 /20**

*Dear Mr Cassidy,*

*we fundamentally oppose this development.....*

*... If this proposal goes ahead, construction work alone will have a massive impact on the local economy and create a huge amount of disruption to Local Traders who are under a huge amount of strain already ... this owner cares little for the cultural identity of this shopping area and more about business.....It is now a regular experience for many Residents to feel like a complete stranger in this part of Brixton.....a very clear demonstration of what has become known as gentrification.... a form of Social Cleansing, a horrible term...' (page 26/449 Appendix 20)*

**c. BRUG ( Brixton Recreation Centre Users Group )**

A key community facility not consulted were users of the grade 2 listed building Brixton Recreation Centre. On 18/09/21 David Duncan, chair of the Brixton Rec Users' Group (BRUG) told the 'Fight The Tower' campaign that BRUG have never been consulted by anyone from Hondo about the impact the tower would have on the Rec in terms of daylight

*and the influx of more than 2000 people who may want to use the facilities. That may displace people who already use it, i.e. the community. It's a form of displacement.*

BRUG emailed Michael Cassidy, Lambeth Planning on 21/10/2020 :

*'This influx of affluent occupants may benefit the more up market shops and restaurants but will directly compete and displace less affluent and disadvantaged users of the REC. It is this community that BRUG was principally formed to defend.'* (p 195/449 Appendix 20)

**d. Carney Place & Milles Square Residents Association** aka Brixton Square 368-372 Coldharbour Lane

On 05/05/2020 this group submitted a detailed objection on numerous grounds, including: daylight and sunlight, height, scale and massing, and privacy:

*... 'We cannot emphasise enough the degradation of our views, privacy, light and aspect should this development go forward.... As residents of Brixton, we would be incredibly concerned of the negative impact on Brixton's architectural heritage and concurrent impact on Brixton's cultural heritage.'*

**Summary - it is a major failing that groups such as these were not fully consulted on the effects the tower would have on their members. All of them opposed the development.**

### **3.2 Low Attendance at Consultation Events**

According to the SCI report:

*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 London Borough of Lambeth (LBL). The applicant also hosted a workshop for local groups in August 2019 (para 1.4)*

It appears that these sessions were not well attended.

For example, on 22<sup>nd</sup> August 2019 Lowick/Hondo held a 'Flexible Central Space' workshop, to which it had invited representatives from 22 local groups. Only 6 groups attended, including 'Impact Brixton' and 'My Spiral' (the latter were also running the workshop itself).

The SCI report reveals that only 73 visitors attended the first public exhibition in May 2019 held over 3 days and 118 responses to the associated survey questionnaires were received. Only 44 visitors attended the second public exhibition held on 31/01 and 01/02/20, and 98 responses to the associated survey questionnaires were received.

For those groups *not* involved, it might have felt that the consultation had taken place 'behind closed doors', according to these numbers. This may well have been exacerbated by the lockdown after March 2020.



In any case, these are extraordinarily low levels of attendance, especially when compared with comments received via the statutory consultation and the community campaign. Clearly the publicity for these events was unsuccessful and inadequate. The fact that many more responses to the survey/questionnaire were received - than actual numbers of visitors attending the public exhibitions - also needs further explanation.

Below; photographs from Lowick's SCI report:



Figure 5: Flexible Central Space Workshop in Brixton Village, August 2019

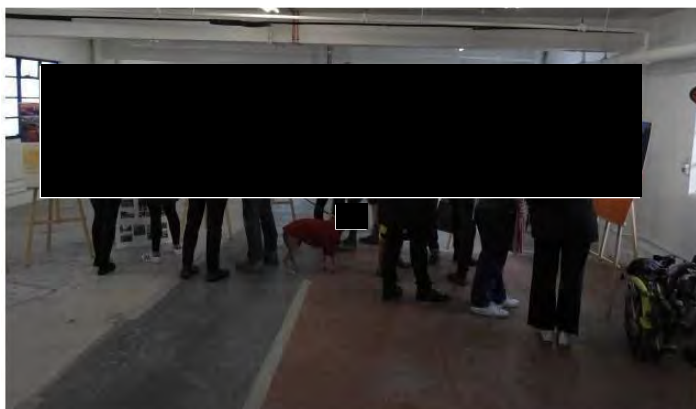


Figure 7: 1 February 2020 public exhibition in Brixton Village

### 3.3 Different Experiences of Consultation

A further serious concern around the involvement of local groups in Hondo's consultation, is that of those who did attend sessions, some feel that their views were either not taken into account, or misrepresented. Attendance at one of these events should not be used to imply approval for the scheme.

For example, I spoke to Roger Hartley from the 'Bureau of Silly Ideas', founded in 2002, which is a not-for-profit public arts and performance organisation, based in Valentia Place SW9. Mr Hartley attended one of Hondo's engagement sessions in 2020.

However, on 18/09/21, he told me: *'My major concern... apart...(from)... lack of consultation is that there's a massive risk of losing cultural space for our community. We haven't got any sense of security set in stone as to how we would survive with the plans as*

*they are at the moment... the construction... could have the potential to put us out of business and we'd lose the resource that's been around for 20 years '.*

NB- Artists and creative agencies in Valencia Place collectively put in a 3-page objection to the scheme (Appendix 20, page 7/449)

### 3.5 Selective Information in Hondo publicity literature (leaflets)

Of the two leaflets Hondo produced in relation to the consultation events (see SCI report) neither illustrates or mentions the size of the 20-storey building - the Tower. Where it is shown, only the lowest storeys are visible along with an artist's impression of the inside space. Instead, the leaflets use the following positive language:

*'an opportunity to extend the market ...'.....a wider publicly accessible space for the benefit of traders and visitors,.....(an opportunity) 'to better link up the transport network'.*



*Above-Illustration from 'Statement of Community Involvement page 11*



*Above-Illustration from 'Statement of Community Involvement page 13*

Note how the artist's impression here focuses on the street level aspects of the development with little reference to the height and scale of the building overall.

### **3.6 Lowick's Survey/Questionnaire as part of Hondo's consultation**

Many of the questions in the survey/questionnaire were plainly biased and/or heavily 'loaded' i.e. leading the respondent towards a preferred response and hence not in accordance with guidelines prescribed by the Market Research Society.

Here are some examples:

1. ***Do you support the introduction of much-needed office space in Brixton, which will create c. 2,000 new jobs, contain 20,000 sq. ft of affordable workspace and will result in increased footfall and £3.5m spend in the local area per year?*** (SCI 2 -4.7.7)

Yet in spite of this, in reply to this question, **54 %** of respondents said they were opposed, while **15 %** were neutral.

2. ***Do you support the extension of the famous Brixton Markets, to further compliment the highly acclaimed Brixton Village and Market Row?*** (SCI 2-4.7.3)

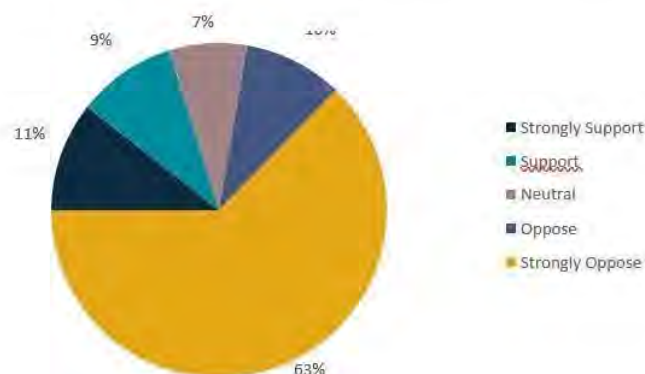
Again, despite this framing, **64%** of respondents said they were either neutral (**23%**) opposed (**10%**) or strongly opposed (**32%**)

3. ***Do you support the need for a taller landmark building to address the distinct lack of office space, including affordable workspace in Brixton, which is significantly lower than the rest of London?***

In this case, despite the heavily loaded question, and the use of the word 'landmark,' a whopping 73% of respondents were either strongly opposed (**63%**) or opposed (**10%**). Meanwhile, three quarters of respondents in fact replied that it was important to protect the 'unique character and heritage' of the area.

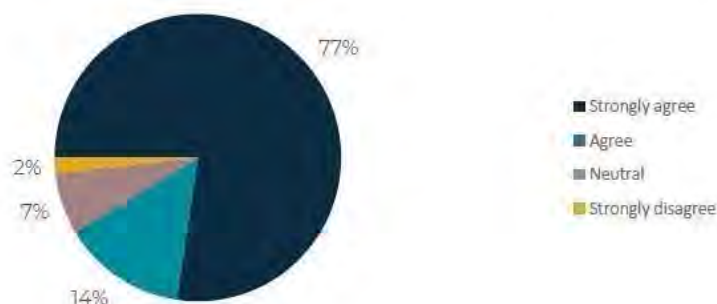
**30 | Statement of Community Involvement – Pope's Road  
SW9 7PR**

**4.7.9. Do you support the need for a taller landmark building to address the distinct lack of office space, including affordable workspace in Brixton, which is significantly lower than the rest of London?**



	Responses	%
Strongly Support	10	10.64%
Support	9	9.57%
Neutral	7	7.45%
Disagree	9	9.57%
Strongly Oppose	59	62.77%
<b>Total responses</b>	<b>94</b>	

4.3.3. Do you agree that it is important to protect the unique character and history of Brixton?



	Responses	%
Strongly agree	89	77.39%
Agree	16	13.91%
Neutral	8	6.96%
Disagree	0	0.00%
Strongly disagree	2	1.74%
<b>Total responses</b>	<b>115</b>	

4.3.4. It is clear from the data presented above that more than three quarters of respondents believe that any new development should respect and protect the diverse history and culture of Brixton. This is something that Hondo Enterprises are committed to doing and have demonstrated this by hosting events such as Windrush Day in June and Black History Month in Brixton Village and Market Row.

Although the report here references ‘Windrush Day’ and ‘Black History Month,’ this might not be seen as sufficient to counter the negative impact that a building on this scale could have overall on Brixton’s local economy and ‘intangible heritage’.

Hondo’s own results clearly showed that a majority of people who attended or responded on line were not in favour of the plans, including the size of the building, the need for commercial office space and so on, and yet in Lowick’s executive summary, at para 1.6 it states, inaccurately, that (emphasis added):

*‘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.’*

**So not only were the survey questions loaded, the reporting of the results was inaccurate.**

Thankfully, respondents were able to give their own views via a comment section of the questionnaire, which gave rise to significant levels of negative feedback. This is acknowledged in the SCI report (paras 1.7 and 1.9):

*‘However, the majority 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... Following feedback ...the height of the building has been reduced to reflect concerns by a total of 11 metres’ (para 1.9)*

This seems to be a modest concession, considering the size of the building proposed and the community’s reaction to it.

**In summary, the community consultation carried out by Hondo was poorly publicised and attracted very few participants. Many of the survey questions were plainly loaded, but despite this, responses clearly demonstrate strong public opposition to the scheme for a wide variety of reasons. This is consistent with the results of the statutory consultation.**

**The SCI produced by Lowick, not only promotes the scheme in the narrative, it is misleadingly inaccurate in its summing up of the results of the consultation.**

#### **Section 4. Hondo’s relationship with Brixton**

In their introduction to the SCI report Lowick state that *‘Hondo is part of a property development company who have a longstanding presence in the borough as the current owners of Brixton Village and Market Row’* (Executive Summary 1.2)

This is a generous use of the word ‘longstanding’, since Hondo only recently purchased those indoor markets in 2018 and ignores the fact that Hondo’s troubled relationship with Brixton.

##### **4.1 Hondo’s relationship with ‘Nour Cash and Carry’ and Brixton market traders**

This popular small supermarket in Market Row has been offering a diverse range of food products from the Caribbean, Africa, Asia and elsewhere and meeting the needs of the local community for over 20 years.

In January 2020 Hondo served ‘Nour Cash & Carry’ with a section 25 notice, requiring them to leave their premises on 22nd July 2020. The ‘Save Nour’ campaign sprang up in response, and a petition in support of the shop gathered nearly 5,000 signatories. This successfully forced Hondo to reverse their decision in June 2020.

Although this climbdown by Hondo was seen by many as a victory in the fight to preserve local communities, market traders in Brixton Village and Market Row have told us that they remain fearful that upcoming rent increases will force them to close. However, they do not appear willing to speak out about this publicly for obvious reasons.





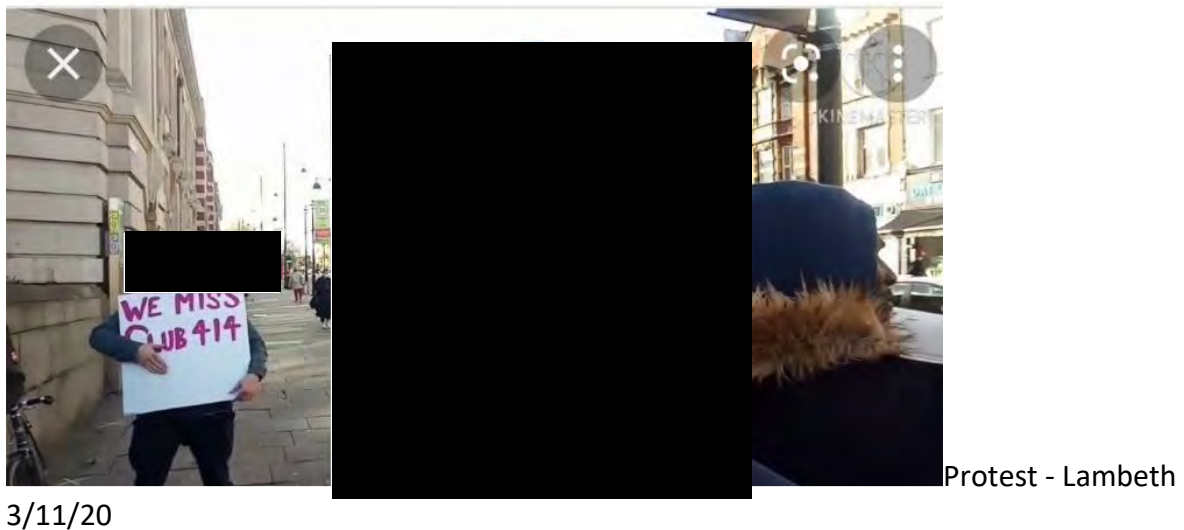
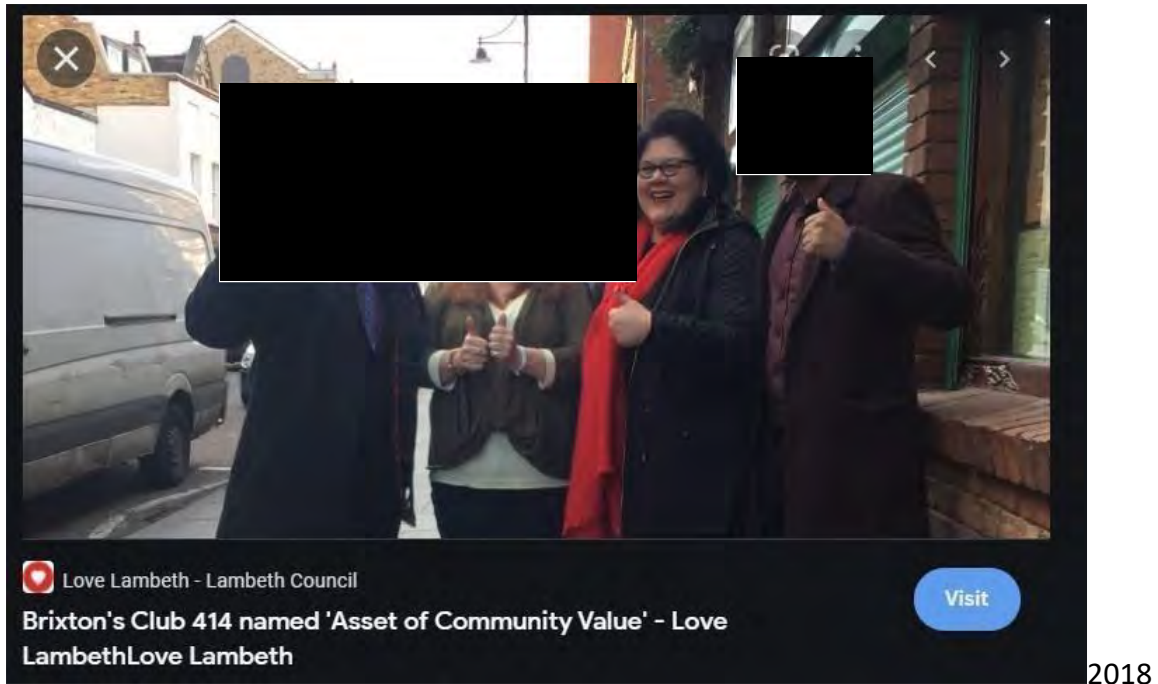
Above-Nour Cash and Carry Supermarket celebrate being saved from eviction in June 2020

#### 4.2 The 414 Club

A further erosion of trust between Hondo and the community occurred after the '414' music venue on Coldharbour Lane was purchased by Hondo in 2019. This venue had been running successfully since 1981, set up with support from Lambeth Council as a community venture, following the Brixton riots and was a staple of Brixton's diverse and eclectic nightlife for over 30 years.

It was recognised as an "asset of community value" in 2018 by Lambeth council, following a threat of eviction by its previous landlords, Market Row Ltd which was successfully defeated in a court case in December 2017.

Following Hondo's purchase, the club were refused a new lease and forced to close. This loss has been widely attributed to Hondo's lack of empathy for the community they were dealing with. These events should be taken into consideration when looking at Hondo's plans for Pope's Road and their consultation efforts in relation to it.



## Section 5. The Role of the Brixton Project

**5.1** 'The Brixton Project' is a community business/social enterprise known for initiatives such as the 'Brixton Pound, launched in response to the financial crash of 2008.

According to Hondo's Community and Commercial Use Strategy, submitted with the planning application, the Brixton Project was commissioned by Hondo to produce a strategy for the use of the proposed community floorspace (ref 9).

In the 2<sup>nd</sup> addendum to PAC2, only published a few hours before the meeting, is a report produced by Brixton Project which stated that:

*Our conclusions are now being offered **independently from the applicant's strategy....***

*Three things are clear from the consultation thus far:*

1. *The application has catalysed division in the community which pits the proposed public benefit against the corrosion of values, culture and heritage. Beyond the physical aspects, **the size of the building is widely felt to symbolise the disempowerment of community values.***
2. *The community is tired of a carrot and stick approach to planning and development that leaves local people without real access to decision-makers....*
3. *There is a significant appetite for the community to take an active and positive role in the shaping of Brixton's built environment...*

*.....The **height and mass of the building remain the focus for objectors who feel the corrosion of culture and heritage at the heart of our built environment is a wholly unacceptable consequence of this plan....***

## **5.2 The Brixton Project's recognition of local opposition**

While the Brixton Project acknowledged views for and against the tower, it recognised that strong local opposition was focused on issues of the community's alienation from the consultation process, and the threat of displacement. It would appear that the Brixton Project have now distanced themselves from their former relationship with Hondo and regard Hondo's own community consultation as inadequate.

While the Brixton Project's partnership with Lambeth continues, the strength of feeling around the Hondo development locally was enough for them to eventually speak out against it.

## **Section 6. Community Campaigns - Petitions and Public Opposition**

### **6.1 'Fight the Tower' and SNSB 'Save Nour, Save Brixton' campaigns**

Local opposition to the Hondo Tower grew through discussions on-line, within local organisations, and through word of mouth. A key player in this was the 'Save Nour Save Brixton' campaign, who launched 'Fight the Tower' after PAC 1.

**Petition 1.** An on-line change.org petition addressed to Lambeth Council, opposing the plans, launched on 09/2020 reached 7,300 signatures by the time of the second Lambeth PAC on 3rd Nov 2020. This petition currently has 8,468 signatures.

Lambeth questioned the verification of this petition both in the 2<sup>nd</sup> Addendum for PAC2 and in the meeting itself.

Below is a quote from the PAC on 3<sup>rd</sup> Nov 2020.

## **Rob O’Sullivan (Lambeth Head of Development Planning): ...**

*‘Officers have requested an electronic full copy of the petition, which includes names, addresses, and signatures of all that have signed it, together with individual comments, so that the contents of the petition can be verified. The full copy has not been provided, and therefore officers are unable to confirm the accuracy or content of the petition.*

Fight the Tower have checked with the local resident who started the petition, and they are unequivocal that no such contact was made. To date the council has not provided any evidence that they did in fact contact them. Many Brixton residents were angered that this huge petition had not been taken into consideration during the second PAC and that their voices had not been heard.

## **Petition 2 - Addressed to Mayor Sadiq Khan**

Following PAC2, a change.org petition entitled ‘Fight the Tower’ (FTT) was launched’ requesting that London Mayor Sadiq Khan intervene to stop the Tower going ahead. This has now reached 4,956 signatures as of 29<sup>th</sup> October 2021

## **6.2 Postcards**

Since November 2020 SNSB/Fight the Tower campaigns have been running a weekly stall located either on Pope’s Road or Windrush Square in Brixton, informing residents about the plans and asking for their views.

This kind of outreach work/information sharing, reflects the lack of information made available to residents who remain unaware of the scheme and acknowledges that many people are digitally excluded. It could be argued the community campaign has succeeded in informing residents about the situation far more effectively than the developer did.

People who stop at the stall are invited to sign a postcard giving their views. Originally addressed to Lambeth council, since 03/21 they have been addressed to Sadiq Khan, London Mayor. To date SNSB has collected a total of nearly 2000 postcards with objections.

## **Section 7. ‘Afterthoughts’ from the developers and photoshopped images of ‘community’**

**7.1.** We would argue that Hondo Enterprises failed to work in the ways set out in their Planning Performance Agreement signed with Lambeth which states that:

‘new development must contribute to the well-being of existing and future communities’ and that ‘development proposals are carefully considered in a constructive, collaborative and open manner.’

## **7.2 Afterthoughts from the developers in response to local opposition prior to PAC2**

In response to questions raised by councillors and Helen Hayes MP, among others, as well as public opposition in general, Hondo Enterprises appeared to make minor changes to the

building's design prior to PAC2. This included attempts to improve the public perception of the scheme and the imagery connected with it.

The alterations to the plans could be seen as 'cosmetic' and did little to address the larger issues, such as the building's size and its function as commercial office space.

As well as some external changes to the building's appearance, changes to the design included:

1. A marginal increase in affordable workspace - an uplift from 10 percent to 12.5 percent
2. Relocating the dedicated community space internally within the market extension, but without any increase in size.

During the first PAC, Cllr Ben Kind commented;

*".... I was interested in the community floorspace. What is it going to be used for? It appears to be added on as an afterthought..."*

A planning officer replied: *"The community engagement is not intended to be binding."*

We would argue that open collaboration with the community should be at the forefront of a planning process such as this, if it is going to be of benefit to that community.

### **7.3 Colourful Brixton?**

Meanwhile the colourful images produced in October 2020 by Hondo to promote the application could again be seen as out of step with local feeling and were greeted with bemusement on local social media and digital news sources, such as Brixton Buzz.

Economic displacement and gentrification are seen as real issues locally - they are experienced directly by marginalised communities.

The kind of imagery employed by developers is therefore very important. It can be a key part of the communication, or lack of communication, between developers and communities who may see themselves as 'under threat' from these processes.

We have argued there has been a lack of community consent and engagement here. These artists' impressions of 'community', 'heritage' and 'diversity' appear to have been bolted, or 'photoshopped' onto the existing plans, without any real understanding of whether or not the real people affected by the plans feel included in the plans themselves.

We would argue that these images are no substitute for real community consultation and engagement.



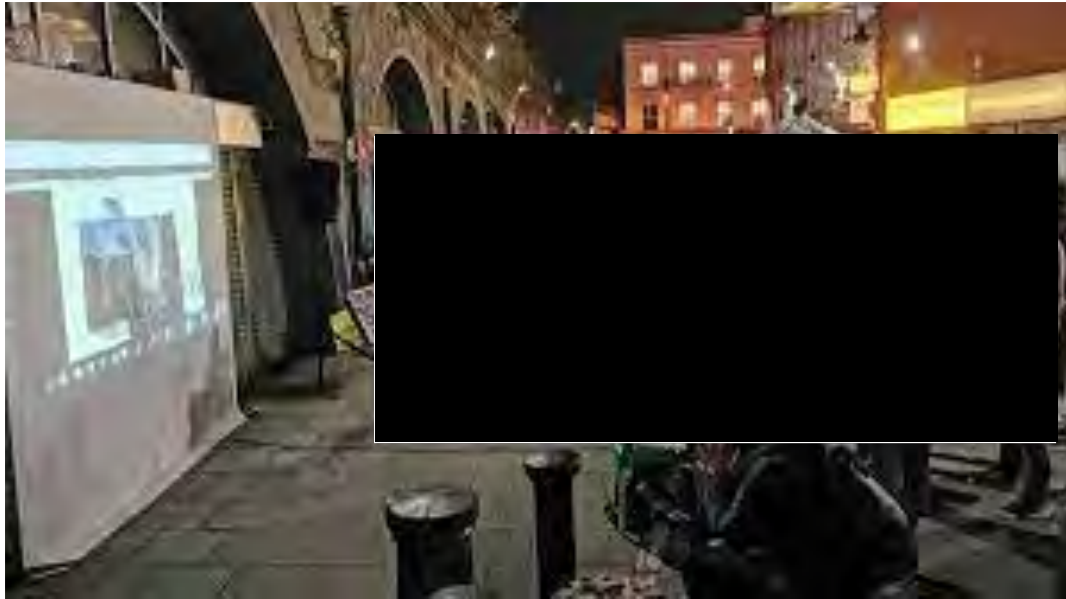


And here's the all-sunny, fun packed space outside on Pope's Road, where young children can run free  
parping saxophones, and where beautiful trees and bushes grow simply *everywhere*.



Hondo publicity photos, featured in Brixton Buzz, 8<sup>th</sup> October 2021





Above-Brixton residents watching a public screening of the PAC meeting on November 3rd 2020 organised by campaigners against the Hondo Tower plans

## **Section 8. The Hondo Tower, Brixton's Economic Prospects and the London Recovery Programme**

**8.1** Hondo Enterprises describe themselves as 'a property investment, development and asset management company specialising in *opportunistic* and value - added transactions in Central London' (ref 10, italics added.) It doesn't make sense that an 'opportunistic' development can be repackaged to residents as a beneficial opportunity if developers have failed to acknowledge their existence in the first place.

Rent increases by Network Rail a decade ago along with the other economic forces described have destabilised a number Brixton's long standing independent retailers.

Therefore, we at 'Fight the Tower' and many other Brixton based groups would welcome and support a community-focused recovery programme, involving the council, central government and the GLA's planning directorate.

We are making the case however that the approval of this tower would not meet the Mayor's outcomes such as "Building Strong Communities", "*Sustainability*" "Helping Londoners into Good Work", "High Streets for All" and "A Green New Deal" all of which will be needed to help 'build back' Brixton.

If the project does not benefit those who need it most, then it will not recognise or address 'structural inequalities' in the area. An inadequate allocation of community space, and no firm guarantees of affordable rents for local businesses would only further contribute to spiralling gentrification.

Plans to construct new retail space, next to an established town centre won't help local retailers already affected by reduced footfall and increased reliance on home deliveries.

We have been listening to Brixtonians give their views-the overwhelming reaction has been one of shock, anger and some weary cynicism about the developers' motives.

## **8.2 Office space vs private housing**

Neighbouring International House already provides low-cost space for Brixton's start-ups, at lower rates than those anticipated for the Hondo Tower, yet filling them has been slow. Low demand for commercial office space in Brixton, even before the pandemic, raises justified fears this tower could be repurposed as private housing, with no affordable offering.

This is a point made by Helen Hayes MP at PACs 1 and 2, who questioned whether there were sufficient protections against this.

## **Conclusion**

The communities of Brixton would be very supportive of the GLA's Recovery Programme, if the solutions are community centred more than developer-led.

Brixton's communities deserve better. Let's work together to come up with a plan that truly supports Brixton's communities, rather than one that displaces them from a neighbourhood which they helped to make unique.

Thank you.

[REDACTED]

## **References**

### **ref 1. PAC 1 Addendum 1- Planning Applications Committee- 25<sup>th</sup> August 2020**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:c0570c6a-d233-4191-973e-db956d322840>

### **Addendum 2 - Planning Applications Committee- 25th August 2020**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:0621f60d-c120-4b6f-b0aa-8d72bb0fe543>

### **ref 2 PAC 2**

### **Addendum 2 - Planning Applications Committee-3<sup>rd</sup> November 2020**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:5fdfff2c-5d67-4219-ac07-135230efdfa9>

**ref 3 Economic Impact Assessment Economic Impact Assessment-Volterra**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:583d3d25-5e80-4b21-af43-03fe1af68bc2>

**Employment and Skills Plan-Volterra March 2020**

[https://planning.lambeth.gov.uk/online-applications/files/6DF2DE34DDA308158071458C2E395194/pdf/20\\_01347\\_FUL-EMPLOYMENT\\_AND\\_SKILLS\\_PLAN-2467221.pdf](https://planning.lambeth.gov.uk/online-applications/files/6DF2DE34DDA308158071458C2E395194/pdf/20_01347_FUL-EMPLOYMENT_AND_SKILLS_PLAN-2467221.pdf)

**ref 4 Pope's Road-Travel Plan and Transport Assessment- Caneparo-July 2020**

[https://planning.lambeth.gov.uk/online-applications/files/F7060DA3D474A6758E014C378D9BFB7F/pdf/20\\_01347\\_FUL-TRAVEL\\_PLAN-2510056.pdf](https://planning.lambeth.gov.uk/online-applications/files/F7060DA3D474A6758E014C378D9BFB7F/pdf/20_01347_FUL-TRAVEL_PLAN-2510056.pdf)

[https://planning.lambeth.gov.uk/online-applications/files/213C765134DE9DEF21A37CDE1756B3D3/pdf/20\\_01347\\_FUL-TRANSPORT\\_ASSESSMENT\\_F1\\_200331\\_PART\\_1-2467238.pdf](https://planning.lambeth.gov.uk/online-applications/files/213C765134DE9DEF21A37CDE1756B3D3/pdf/20_01347_FUL-TRANSPORT_ASSESSMENT_F1_200331_PART_1-2467238.pdf)

**ref 5 LONDON OVERGROUND STATIONS STUDY Steer Davies Gleave Report 2014**

<https://www.lambeth.gov.uk/sites/default/files/ec-lambeth-overground-stations-study-report-2014.pdf>

**ref 6 82 Email Objections received by received by Lambeth Planning Dept**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:12ad6658-4cdc-4daa-a0a9-d48e7721f2ce>

**ref 7 Comments from Lambeth Council's planning portal—Objections and comments in favour of the planning application**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:15ca5a87-0c29-4df9-9953-6cbf7758dbd2>

**ref 8 Statement of Community Involvement parts 1-3 (Lowick)**

## Part 1

[https://planning.lambeth.gov.uk/online-applications/files/AF9704AA993FF4232113D60E6F274D3B/pdf/20\\_01347\\_FUL-STATEMENT\\_OF\\_COMMUNITY\\_INVOLVEMENT\\_PART\\_1-2467243.pdf](https://planning.lambeth.gov.uk/online-applications/files/AF9704AA993FF4232113D60E6F274D3B/pdf/20_01347_FUL-STATEMENT_OF_COMMUNITY_INVOLVEMENT_PART_1-2467243.pdf)

## Part 2

[https://planning.lambeth.gov.uk/online-applications/files/35E8EDE224596F222675725BC5013F55/pdf/20\\_01347\\_FUL-STATEMENT\\_OF\\_COMMUNITY\\_INVOLVEMENT\\_PART\\_2-2467242.pdf](https://planning.lambeth.gov.uk/online-applications/files/35E8EDE224596F222675725BC5013F55/pdf/20_01347_FUL-STATEMENT_OF_COMMUNITY_INVOLVEMENT_PART_2-2467242.pdf)

## Part 3

[https://planning.lambeth.gov.uk/online-applications/files/85E76E9265451D692FA8CBF8A38EACA2/pdf/20\\_01347\\_FUL-STATEMENT\\_OF\\_COMMUNITY\\_INVOLVEMENT\\_PART\\_3-2467241.pdf](https://planning.lambeth.gov.uk/online-applications/files/85E76E9265451D692FA8CBF8A38EACA2/pdf/20_01347_FUL-STATEMENT_OF_COMMUNITY_INVOLVEMENT_PART_3-2467241.pdf)

## **Pope's Road Exhibition Boards-Hondo/Adjaye Associates February 2020**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:ebcf8e76-f56a-4b00-b504-6b7d926eb233>

## **Ref 9 Community and Commercial Use Strategy**

[https://planning.lambeth.gov.uk/online-applications/files/875B54B63588D0453C5869894C96468D/pdf/20\\_01347\\_FUL-COMMUNITY\\_AND\\_COMMERCIAL\\_USE\\_STRATEGY-2510052.pdf](https://planning.lambeth.gov.uk/online-applications/files/875B54B63588D0453C5869894C96468D/pdf/20_01347_FUL-COMMUNITY_AND_COMMERCIAL_USE_STRATEGY-2510052.pdf)

## **Ref 10 Hondo Enterprises**

[\(https://hondo-enterprises.com/\)](https://hondo-enterprises.com/)

## **Additional Sources**

### **Petition one**

<https://www.change.org/p/cllr-jack-hopkins-leader-of-lambeth-council-stop-hondo-enterprises-building-a-20-storey-tower-in-the-central-brixton-heritage-area>

### **Petition two**

<https://www.change.org/p/sadiq-khan-sadiq-khan-stand-with-brixton-stop-taylor-tower-e3e171ec-0bcf-45b7-a47b-b06a3e06f67b?fbclid=IwAR2Mn1iR1JLYGPBarDpoD-o4Rce8tKD46UcDpLHIQM8pdZuYyTQzMOy27h0>

## **Brixton Conservation Area**

<https://www.lambeth.gov.uk/sites/default/files/pl-BrixtonConservationAreaStatement26March2012.pdf>

## **Public Comments on Lambeth's Planning Portal NOTES**

NB-When last checked on 29<sup>th</sup> October 2021, the responses to this application on Lambeth's planning portal were as follows:

Public Comments 2187

Objections: 1914

Supporting: 262

The total number of people reported as objecting or supporting is 2176.

Of these 2,176 entries, 87.95% are opposed to the plan.

<https://beta.lambeth.gov.uk/planning-building-control/planning-applications/search-submit-comment-applications>

Ref : 20/01347/FUL

## **The Pope's Road site**

<https://www.brixtonbuzz.com/2018/01/last-dance-at-the-brixton-rooftop-brixton-beach-and-casa-brixton-as-sports-direct-take-control-jan-2018/>

## **414 Club**

<https://brixtonblog.com/2020/12/building-owners-cold-shoulder-creators-of-club-414/?cn-reloaded=1>

<https://brixtonblog.com/2016/05/414-club-owner-defeats-council-high-court/?cn-reloaded=1>

<https://www.brixtonbuzz.com/2017/12/brixtons-club-414-wins-high-court-battle-as-landlords-fail-to-force-their-eviction/>

## **Nour Cash and Carry**

<https://www.brixtonbuzz.com/2020/04/petition-launched-to-save-nour-cash-carry-supermarket-in-brixton-market/>

**Hondo Enterprises- background**

<https://www.brixtonbuzz.com/2020/02/brixton-for-sale-who-are-hondo-enterprises-owners-of-brixton-village-market-row-club-414-and-more/>

**Hondo Tower design ‘tweaks’**

<https://www.brixtonbuzz.com/2020/10/hondo-tweak-the-design-of-their-brixton-20-storey-enormo-tower-with-groovy-happenings-and-foliage-galore/>

**Brixton Buzz-Hondo consultation-Pre written letters**

<https://www.brixtonbuzz.com/2020/10/hondo-start-soliciting-signatures-in-the-street-to-support-their-unpopular-enormo-tower-in-popes-road-brixton/>

**Brixton Buzz-Build up to PAC meeting**

[https://www.brixtonbuzz.com/2020/08/lambeth-officers-recommend-approval-for-controversial-hondo-enormo-tower-along-popes-road-ahead-of-planning-applications-committee/?fbclid=IwAR3FP9Ju4DcShgzZFPZEn66AVQjkgraj-CiheQ\\_zmjlGoTppJNt27hYd3\\_E](https://www.brixtonbuzz.com/2020/08/lambeth-officers-recommend-approval-for-controversial-hondo-enormo-tower-along-popes-road-ahead-of-planning-applications-committee/?fbclid=IwAR3FP9Ju4DcShgzZFPZEn66AVQjkgraj-CiheQ_zmjlGoTppJNt27hYd3_E)

**Public Transport/Overground connections**

<https://www.brixtonbuzz.com/2017/03/lambeth-council-starts-review-to-look-at-business-case-for-reopening-east-brixton-train-station/>

<https://www.brixtonbuzz.com/2014/10/lambeth-feasability-study-looks-into-new-brixton-and-loughborough-junction-overground-stations/>

**The Brixton Project**

<https://www.thebrixtonproject.com/>

**Carney Place/Milles Square/Brixton Square letter of objection**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:95b410a7-b336-40f2-adcb-42a702cb9e76>

**Email Objection from Brixton Rec Users’ Group**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:92ea5cbd-6d4b-4f1e-a3e4-84a514bfd02f>

**Lambeth Planning Performance Charter**

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:67101417-a614-4b29-ae06-f2064e07c050>

## Protests

<https://www.brixtonbuzz.com/2020/11/video-report-and-interviews-from-the-hondo-tower-protest-outside-lambeth-town-hall-2nd-nov-2020/>

## Example of postcards expressing objections to the tower

**THIS TOWER WILL  
PUSH PRICES UP  
AND PEOPLE OUT**

Lambeth Council  
Planning Department  
Lambeth Town Hall  
Brixton  
SW2 1RS

Dear councillors,  
I am a local resident based in Brixton.  
I'm writing to object the 20/01347/FUL proposals for 20-24 Pope's Rd.  
I object to the proposal on the basis of:

*Once again, wealthy Communities  
of people are wanting to impose  
their wealth fuelled plans onto  
much poor, deprived Communities.  
Brixton, my home has had enough  
of it's soul torn from it's  
Community.  
Best,  
The People of Brixton*

*This cannot  
go ahead!!*

Lambeth Council has confirmed the date of the meeting that will vote on  
whether London's tower should be approved or rejected on  
Tuesday 3 November at 7am.

SAVENOUS.COM @SAVE\_NOUR #FIGHTTHETOWER #WEAREWATCHING

**THIS TOWER WILL  
PUSH PRICES UP  
AND PEOPLE OUT**

My name is: [REDACTED] Mr Michael Cassidy

I am a local resident based at: [REDACTED] Planning Department

I'm writing to object the 20/01347/FUL proposals for 20-24 Pope's Road. London Borough of Lambeth

I object to the proposal on the basis of: Lambeth Town Hall

*Keep culture in the  
community.*

[REDACTED]

Brixton  
SW2 1RS

**FIGHT  
THE  
TOWER**



## THIS TOWER WILL PUSH PRICES UP AND PEOPLE OUT

My name is: [REDACTED]

I am a local resident based at: [REDACTED]

I'm writing to object the 20/01347/FUL proposals for 20-24 Pope's Road.

I object to the proposal on the basis of:

there is very little demand for  
luxury office here in Brixton.  
What about supporting the  
local community with long  
term, sustainable, well paid  
jobs? This office block will do nothing  
for the local  
community

Best  
[REDACTED]



Mr Michael Cassidy

Planning Department

London Borough of Lambeth

Lambeth Town Hall

Brixton

SW2 1RS

### Lambeth Council

#### Planning Performance Agreement Charter

The Council's Community Plan sets out its vision for the future of the Borough. This vision requires that all development is of the highest quality and is founded on the principles of economic, social, environmental and physical sustainability. As set out in its Local Plan new development must contribute to the well-being of existing and future communities.

This Charter sets out how the Council will work with developers, the community and other key stakeholders to ensure that all large and complex development proposals are carefully considered in a constructive, collaborative and open manner. Such an approach is the best way of developing proposals that will meet the vision and objectives of the Council. Where major development proposals are deemed to be in accordance with the Development Plan for the area or have the potential to meet the Council's objectives, the Council will instigate a Project Team approach and seek to manage the project through a Planning Performance Agreement (PPA).

Excerpt from Lambeth's Planning Performance Agreement Charter

## Additional photographs



Above-protest outside Lambeth Town Hall 3rd November 2020





We've no idea what's happening here. Some random woman seems to have brought along her own flip chart while everyone ignores her.

Above-Hondo publicity material depicting a scene inside the proposed development, as featured in Brixton Buzz article 8<sup>th</sup> October 2020



Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	
Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	
Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	
Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	
Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	
Contributor Name	Address	Comment Type	Date	Comment
[REDACTED]	[REDACTED]	S - Support	28.10.2020	

Above-Blank expressions of support on Lambeth's planning portal

Below-3 model letters in support of the application.

Expansion of market / Office space

Mr Michael Cassidy  
Planning Department  
London Borough of Lambeth  
Lambeth Town Hall  
Brixton  
SW2 1RS

My name is [REDACTED]

I am a local resident based at [REDACTED]

I'm writing in support of the 20/01347/FUL proposals for 20-24 Pope's Road.

I support a new market space in this new development. Brixton Market is integral to the community and an expansion will help local business people continue to serve local people and allow for a range of services including traditional retailers. Similarly, I'm very encouraging of increasing the number of good-quality jobs in Brixton town centre. Locally there are still serious problems with unemployment. The current economic crisis will cause many more people to lose their jobs. It is critical that we do everything we can to support future economic growth and new job opportunities.

An expanded market will improve the overall shopping offer and experience for residents and visitors, increasing footfall for the whole Market. A bustling new market space with many more small shops will provide more options and more attractive spaces to enjoy food and drink in Brixton town centre. New free public toilets will also make the experience of shopping in Brixton more comfortable and pleasant. Brixton has become an increasingly-attractive place for people to set up businesses in the past few years, but there is a serious shortage of office space. I'm supportive of these plans, which will encourage more businesses, particularly in the creative industries, to base themselves here. A critical mass of new office space will provide a huge boost to traders, shops and restaurants in the town centre, with almost 2,000 new workers spending money each working day.

Brixton's markets have thrived in the past few years, this expanded Market will preserve space for traditional traders and provide opportunities for new businesses that can attract many more thousands of visitors to Brixton. Helping Brixton become a significant office location should also take pressure off public transport, as more local people will have opportunities to work locally, and not have to commute to central London.

Creating a fantastic new market space will provide space for growth and a boost for the businesses within the existing market spaces like Brixton Village, Market Row and Electric Avenue. The scale of this development will also enable more local residents to be supported with affordable workspace, helping them personally and boosting Brixton's economy with more local start-ups and entrepreneurs.

At this difficult economic time it is more important than ever to build the new spaces that Brixton's businesses will need to create jobs in the future.

Best [REDACTED]



[REDACTED]

My name is... [REDACTED]

I am a local resident based at ... [REDACTED]

I am a market trader based at ...

I am a business-owner based at...

I'm writing in support of the 20/01347/EUL proposals for 20-24 Pope's Road.

I support the plans for extra market space in this new development. Brixton Market is so important to our local community and more space will help give local businesspeople a boost. It will also mean a wide range of services - including traditional retailers - on offer for our local community and visitors to Brixton.

A larger market will improve the shopping experience for the community as well as encouraging more footfall throughout the Market. A bustling new market space with many more small shops will provide more options and more attractive spaces to enjoy food and drink in Brixton town centre. New free public toilets will also make shopping in Brixton much more comfortable and pleasant.

Creating a fantastic new market space will provide space for growth and a boost for the businesses in the existing market spaces like Brixton Village, Market Row and Electric Avenue.

Best  
... [REDACTED]

Expansion of market / Office space

Mr Michael Cassidy  
Planning Department  
London Borough of Lambeth  
Lambeth Town Hall  
Brixton  
SW2 1RS

My name is [REDACTED]

I am a local resident based at [REDACTED]

I'm writing in support of the 20/01347/FUL proposals for 20-24 Pope's Road.

I support a new market space in this new development. Brixton Market is integral to the community and an expansion will help local business people continue to serve local people and allow for a range of services including traditional retailers. Similarly, I'm very encouraging of increasing the number of good-quality jobs in Brixton town centre. Locally there are still serious problems with unemployment. The current economic crisis will cause many more people to lose their jobs. It is critical that we do everything we can to support future economic growth and new job opportunities.

An expanded market will improve the overall shopping offer and experience for residents and visitors, increasing footfall for the whole Market. A bustling new market space with many more small shops will provide more options and more attractive spaces to enjoy food and drink in Brixton town centre. New free public toilets will also make the experience of shopping in Brixton more comfortable and pleasant. Brixton has become an increasingly-attractive place for people to set up businesses in the past few years, but there is a serious shortage of office space. I'm supportive of these plans, which will encourage more businesses, particularly in the creative industries, to base themselves here. A critical mass of new office space will provide a huge boost to traders, shops and restaurants in the town centre, with almost 2,000 new workers spending money each working day.

Brixton's markets have thrived in the past few years, this expanded Market will preserve space for traditional traders and provide opportunities for new businesses that can attract many more thousands of visitors to Brixton. Helping Brixton become a significant office location should also take pressure off public transport, as more local people will have opportunities to work locally, and not have to commute to central London.

Creating a fantastic new market space will provide space for growth and a boost for the businesses within the existing market spaces like Brixton Village, Market Row and Electric Avenue. The scale of this development will also enable more local residents to be supported with affordable workspace, helping them personally and boosting Brixton's economy with more local start-ups and entrepreneurs.

At this difficult economic time it is more important than ever to build the new spaces that Brixton's businesses will need to create jobs in the future. [REDACTED]

Best [REDACTED]



[REDACTED]

---

**From:** L [REDACTED]  
**To:** 27 May 2022 18:11  
Popes Road  
**Subject:** 20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

**20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection**

Dear GLA Officers,

I wish to submit a request to speak at the Hearing on 10<sup>th</sup> June. I will be objecting to Hondo Enterprises' application for 20-24 Pope's Road, also known as the 'Hondo Tower.'

I will be speaking on behalf of the 'Fight the Tower' campaign and as a lifelong Lambeth resident.

I would like to cover points made in two submissions I have made previously, as follows.

**Local Consultation and Public Opinion** (4<sup>th</sup> Nov 2021)

**Response to the Revised Planning Application** ( 13th Dec 2021)

I will shortly be submitting a brief summary of the points I would like to cover, if given the opportunity to speak, along with copies of my original submissions.

I am kindly requesting a little more time. I intend to have this with you by midnight this evening. I hope you will understand, as I have been pressed for time this week, being a father and a teacher.

sincerely,

[REDACTED]

[REDACTED]

---

**From:** Scarlett O'Hara [REDACTED]  
**Sent:** 31 May 2022 16:32  
**To:** Popes Road  
**Subject:** 20/01347/FUL 20-24 Popes Road, Brixton  
**Attachments:** PAC Popes Rd FINAL.docx; Popes Road (part 2).docx

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

My name is Cllr Scarlett O'Hara and I am one of the councillors for Brixton Windrush ward (previously Coldharbour ward) where the Popes Road development is proposed. I spoke at the PAC in Lambeth (at both PAC meetings) to object to the application and also submitted my objection via the portal to the Mayor's office. However, I have not received notice about the public Representation Hearing for this application.

I would like to attend and speak to **object** to the application.

Please see my submission attached.

Please let me know if I can attend and speak.

Regards,

Cllr Scarlett O'Hara

Brixton deserves better than this mediocre tower block looming over the town centre. It is intended as a “landmark” but is of little architectural merit or interest.

This tower will dominate the streetscape and it will change the nature of downtown Brixton forever.

The development deviates from the Local Plan and has been recognised as inflicting harm on local heritage assets. I urge members to carefully weigh the benefits of the development against these and other harms.

The design is out of step with the quality and character of the wider Victorian buildings along Electric Avenue and Atlantic Road. As an office block on the edge of a Conservation area, it will be visible from all over Brixton, including the open spaces of Brockwell Park.

It will overshadow many of our attractive heritage assets, including St Matthews Church, the Town Hall and the Library.

This building is too tall for its downtown location and will have an overbearing aspect on neighbouring businesses, bringing an increased sense of enclosure to the bustling low-rise market shopping area.

By virtue of its height, scale and massing, it is an unneighbourly development, particularly for adjoining homes in Carney Place where many residents are working from home, frequently now using their bedrooms as offices.

It is also an opportunity missed. The development does not achieve the highest standards of sustainability, with its BREEAM rating missing “outstanding” or “excellent”. It only offers the required amount of affordable office space, in an area of the borough with high unemployment and levels of deprivation.

Consider the unique, world-famous nature of the Brixton neighbourhood and provide something sympathetic that serves the needs of this community.

## **Popes Road development – ward councillor statement – PAC – 3<sup>rd</sup> Nov 2020**

It is disappointing that the applicant has not responded to the **depth of the dissatisfaction** with this development.

Brixton is a fiercely independent and diverse neighbourhood and its residents appreciate what they have here and what makes it so special.

As Brixton's Supplementary Planning Document states (appendix 3 p.38) redevelopment should "not drive out the people and uses that give Brixton its rich character." But residents do not feel welcomed by this vast alien construction. The document welcomes "exciting new buildings" so long as they "respond well to their context". Unfortunately, this building fails on both these counts – the **design is an industrial hulk**, which overwhelms its low-rise Victorian neighbours.

This site is adjacent to the Conservation Area and the reasons for this designation are cultural as well as physical – to protect the "varied mix of cultures and communities who live in and use Brixton" – but

How many communities feel comfortable in this glitzy mall?

The Brixton Conservation Area statement explains that one of the "defining features" of Brixton is the communities' "direct relationship with the physical character of the area". However, the low-rise, small-scale shops and stalls around Popes Road and Brixton Station Road will be overwhelmed by this out-of-scale block casting its long shadow over them. And **15 out of 20 heritage assets assessed will be harmed** according to Table 3 – a substantial impact.

From prestigious architect Sir David Adjaye, this is an opportunity missed. It isn't responding to the needs of the people who live here – though we welcome increased affordable workspace we want a commitment to pay the London Living Wage – many will feel put off from entering by the security and curated community offerings. And the amount of floor space dedicated to community use **remains little over 1% of the total**.

So, who is this building for? It isn't for the majority of people who call Brixton their home.

[REDACTED]

---

**From:** [REDACTED]@HistoricEngland.org.uk>  
**Sent:** 27 May 2022 19:05  
**To:** Popes Road  
**Cc:** [REDACTED]  
**Subject:** FW: Notice of Representation Hearing: 10 June 2022  
**Attachments:** Historic England Statement for Pope's Road Hearing - 27.5.22.pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear John

Please find attached Historic England's hearing statement for 20-24 Pope's Road, Brixton. We request to speak at the hearing, in person and in the capacity of an objector.

Many thanks

[REDACTED]

[REDACTED]  
Head of Region, London & South East  
Regions Group

Historic England  
Floor 4 The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

[REDACTED]



## **Historic England Statement**

20-24 Pope's Road, London Borough of Lambeth

GLA reference: 2021/0265

Southwark Council reference: 20/01347/FUL

1. Historic England is a statutory consultee for various types of application affecting the historic environment and is the Government's principal adviser for heritage.
2. Historic England participates in Mayoral hearings about applications when the level of harm to the historic environment is particularly serious and, in this case, additionally because of the significant policy breaches that the application would entail.
3. We have provided detailed written advice to both the local authority and your authority at each stage of the consultation process (letters dated 18 May 2020, 14 October 2020 and 17 December 2021). In these responses, we focused on the scheme's significant harmful impacts on Brixton Conservation Area.
4. This is one of London's best preserved and most characterful historic town centres. Its scale is predominantly low rise, featuring an eclectic mix of complementary architectural styles which form the backdrop to a vibrant, multicultural community. As the Conservation Area Appraisal notes, this is one of Brixton's greatest defining features and has a direct relationship with its physical character. The rich built environment is widely appreciated, and its special character relies on a delicate balance between its many component parts.
5. Fine commercial and public buildings generate a lively roofscape, featuring numerous and diverse decorative corner elements, gables and chimneys. These are typically the tallest architectural features, jostling for attention, but on a human scale. The prominent railway viaducts, which shaped the way the area developed, add to the drama and bring down the perceived scale through their strong horizontal emphasis.
6. The ability to appreciate all these character-defining features and spaces against the backdrop of a clear sky and consistent scale is central to Brixton's strong sense of place.
7. At 20 storeys high, the proposed tower would be significantly larger than anything in the vicinity. Consequently, it would become the focal point in many views, at the expense of Brixton's distinctive local character.
8. While the harm to heritage would be far reaching, the scheme's most profound impact would be on the iconic Electric Avenue (illustrated below). Brixton's famous market street is an architectural set piece – a destination for shoppers from across south London. The proposed development would, by virtue of its scale and assertive design,

aggressively loom over this intimate street, terminating views out of the conservation area.

9. The Church of St Matthew and the Budd Mausoleum are both located within the conservation area, but each is also individually listed at Grade II\*, owing to their high architectural interest. They are local landmarks that are prominent in their historic setting, but the proposals would subjugate them in many views.
10. Officers at Lambeth Council described in their report to the Planning Committee the impact of the proposed development on the setting of the Brixton Conservation Area as “overwhelmingly negative” and we entirely agree with this analysis.
11. Sustaining and enhancing heritage significance is a key tenet of national planning policy that is amplified in the new London Plan. To ensure that development fulfils this objective, the London Plan requires a design-led approach for all development. This approach requires consideration of a site’s context and capacity for growth, in order to deliver buildings that respond positively to local distinctiveness in their scale and appearance. Tall building proposals are specifically required to avoid harm to London’s heritage assets and their settings.
12. Lambeth’s Development Plan recognises that views of the site from the south are highly sensitive. Lambeth Council has consequently undertaken capacity modelling for this and adjacent sites to determine development parameters that would avoid harm to heritage. The application site is not identified as suitable for a tall building, yet the proposals far exceed the height parameters identified for the adjacent, less sensitive site on Brixton Road. Lambeth officers have undertaken a modelling exercise for Popes Road which demonstrates that the application scheme is at least 38 metres taller than they consider the site could reasonably accommodate.
13. The applicant has claimed that the quality of the design is a key justification for the scheme, but the proposals cannot represent good design because of their failure to respond positively to context and, in particular, because their scale and form has not been meaningfully informed by their characterful historic surroundings. The proposed tall building therefore demonstrates a clear disregard for policy and the specific approach to tall buildings required by the London Plan.
14. The scale of the proposed development has instead been determined principally by a desire to provide a specific quantum of commercial floorspace. This predetermined quantum does not conform to the London Plan’s design-led approach to optimising site capacity.
15. Many of our concerns about the scheme’s detailed design were also raised by Lambeth’s independent Design Review Panel. Criticisms of the dominant, repetitive design were made, and these attributes contribute significantly to the building’s alien character in the context of Brixton’s existing townscape. Recent decisions, including the inquiry for the ‘Tulip’ proposal, found that harm to the setting of designated



heritage assets detracts significantly from design quality. In the case of the ‘Tulip’, the unresolved criticisms made by the design review panel counted significantly against the scheme.

16. The proposals would not deliver any heritage benefits that would help to outweigh the harm that has been identified. Given the significant adverse impact on multiple designated heritage assets, Historic England maintains its formal objection to the application.
17. We recognise that this site presents an important opportunity for Brixton, but that’s all the more reason to ensure that any development brought forward is plan-led and supported by an appropriate evidence base which ensures that the historic environment is adequately protected.

  
Inspector of Historic Buildings and Areas  
Historic England



**Figure 1 Electric Avenue (existing and proposed)**

**(Townscape, Heritage And Visual Impact Assessment Addendum, Sept 2020)**

[REDACTED]

---

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** 27 May 2022 13:10  
Popes Road  
**Attachments:** FW: Request to speak at public hearing  
DP GLA submission 220527.pdf; Tall Buildings and Design.pdf; Tall Buildings and Design (revised application) .pdf  
**Importance:** High

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Further to my email just now (see below) please see attached the other written representation referred to in my request to speak document, which I omitted to attach.

Apologies for this.

Kind regards

[REDACTED]

---

**From:** [REDACTED]  
**Date:** Friday, 27 May 2022 at 12:50  
**To:** <popesroad@london.gov.uk>  
**Subject:** Request to speak at public hearing

With reference to the recent notice sent to me on Friday 20<sup>th</sup> May at 14.38, please find attached my request to speak at the public hearing and a statement of the topics I would like to cover.

I also attach previous written representations referred to therein.

Please acknowledge receipt of this email and its attachments.

Many thanks

Kind regards

20-24 Pope's Road, London Borough of Lambeth  
GLA Reference 2021/0265  
Council Reference: 20/01347/FUL

27th May 2022

My name is [REDACTED] I am a local architect and I would like to request to speak at the public hearing on 10th June 2022. I would like to speak in person and my email address is [REDACTED] I am happy to share my personal details.

I would like to speak as an **objector** to the application.

My statement below sets out the topics I would like to cover as follows. They concern the height, design and impact of the building in relation to London and Lambeth policies. These objections have been more fully detailed and evidenced in the attached written documents that have already been submitted to the GLA for consideration by the case officer.

### Tall Buildings

- Tall and large buildings are singled out in planning policy and subject to specific and stringent tests because of the inherent potential for the scale of these buildings to cause harmful effects. These precise tall building policies are set out in the newly adopted London Plan 2021 and the newly adopted Lambeth Plan 2021.
- This application fundamentally breaches London Plan policy D9 ,Lambeth policy Q26 and additionally Lambeth policy PN3 and as such, if approved would undermine these well considered policies and the principle of plan-led development.
- The proposed part 20, part 9 storey building is no doubt a tall building as defined by the Lambeth Plan 2021 (being over 95m AOD as compared to the 45m threshold) but is **not in a location that has been identified by Lambeth in its 2021 plan as being appropriate for tall buildings**. This is a fundamental breach of the Mayor's **new London Plan policy D9 Part B which sets out where tall buildings can be located**.
- Part C of London Plan policy D9 sets out the requirements for tall buildings proposed **in these locations**, it is not a qualification of policy D9 Part B.
- At Annex 10 of the Lambeth Plan 2021, 2 locations in Brixton town centre have been identified by Lambeth as appropriate for tall buildings, but even in those locations close by, the general maximum height recommended by the Lambeth Tall Buildings Study - Topic Paper 8 is 65m, and yet the proposed development would be over 30m taller (47% taller) than this.
- In an apparent contradiction to London Plan policy D9, Lambeth's Local Plan at policy Q26 Part B makes provision for 'windfall' sites not identified in Annex 10 or site allocations, but it states that there is **no presumption in favour of**

**them.** Proposed development is still required to meet all the stringent tests of policy Q26 of the Lambeth Plan and policy D9 of the London Plan. But the proposed development **fails to comply with these policies.**

- These breaches of policy are **evidenced by the Lambeth case officers report** and **Lambeth's Design and Conservation report** and are itemised as follows:
  1. The development will cause **harm to the significance of heritage assets and their settings**, without clear and convincing justification
  2. It would have an adverse impact on the **panoramic view** from Brockwell Park
  3. It would be at odds with and have a negative impact on the nature Brixton's low-rise **townscape**
  4. There is insufficient **transition in height or scale** at the edges of the site to protect amenity and privacy
  5. Reinforcement of spatial hierarchy- with regard to its relationship with the Popes Road pedestrian area, it would have '***an exceptionally oppressive effect on the user's spatial experience of this small urban space***'
  6. The architectural quality is **not exemplary** and **design excellence** is **not** achieved (in terms of its form silhouette or detailing)
  7. it would not positively contribute to the **character** of the area
  8. **Comfort** with regard to wind, daylight, sunlight and noise conditions around the site are compromised- other written submissions and objectors will/have demonstrated the severe impacts on residential and public amenity and environmental comfort
- The **Design Review Panel** considered the proposed height and mass to be '***unacceptably assertive and unacceptable in terms of local townscape and heritage impact***'. The panel considered that '***further reductions*** [from 20 storeys] ***are required to address the harmful heritage and townscape impact.***

### **Site Allocation 16**

- The site allocation for Site 16 (Brixton Central – between the viaducts) which the application site would predominantly occupy, sets out preferred land uses, design principles and key development considerations. **The proposed development does not comply with these site allocation policies** and therefore fails to comply with Lambeth Plan policy PN3 (K).
- The preferred land use for Site 16 is not an office led development and the nature of development proposed is **contrary to the London Plan's classification of Brixton Town Centre as being appropriate for 'protecting small office capacity' (Class C).**
- The **arches** are home to Brixton's much valued artistic and creative communities. The proposed development does not open up these **arches** to

provide north-south link through the site or enhance the arches to provide active uses and routes through as site allocation 16 advocates. On the contrary it creates **tall, narrow and oppressive canyons** between the proposed building and the arches, which Lambeth officers regard as raising **public safety** issues.

- The design makes **no attempt** to allow the site to be **permeated by pedestrian links** now or in the future. The design simply maximises and extrudes its footprint creating a tall impenetrable building mass that is insensitive to its neighbours-some only 3m away. No integration with Site 15 (Pop Brixton/Canterbury Arms) has been considered.
- **most importantly**, this site allocation policy **specifically proposes low buildings 'to protect the amenity of new residential development on Coldharbour Lane adjoining the site'**. These flats are in the Loughborough Park Conservation Area and their residents would not only have their views of the London skyline wiped out by the development, they would suffer **severe daylight loss, loss of outlook and loss of privacy**. The restaurant, on the top floor of the lower block facing the bedrooms of these flats would be open at night as well as during the day.

## **Design**

- Policy D9 of the London Plan also states at para 3.9.4 that:

*The higher the building the greater the level of scrutiny that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in Part D of Policy D4 --Delivering Good Design.*

This includes an assessment by a Design Review Panel, whose views are stated above.

- The design of the building is not in accordance with para 49 of the **National Model Design Code 2021 Part 2** ('Tall Buildings Design Principles') or the adopted **Brixton SPD 2013**, both of which advocate **slender and elegant** proportions for tall buildings, whereas all 3 blocks of the building are basic extrusions from its footprint.
- The design of the building is not in accordance with draft **Lambeth Design Code SPD (Feb 2020) Part 3** which advocates guarding against overdevelopment -**optimising but not exceeding the development capacity of the site** and guarding against '*outcomes that loom uncomfortably over existing low rise neighbours*'.
- Paragraph 134 of the NPPF 2021, states that:

**" Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance**

*on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes"*

**The application site has huge potential for a development that meets the needs of Brixton and is also policy compliant.** But this application as it stands is precisely the sort of development that London and Lambeth tall buildings policies are set out to prevent and so should be rejected.

If this application were to be approved it would set a damaging precedent for further tall buildings in Brixton town centre and across London.

I urge the Mayor to **refuse** this application.

Written representation submitted by:

Date: 13th Dec 2021

In response to the recent revisions to this application, I note that there has been no change to the height, scale or the design of the building. Therefore all the issues raised in my previous representation submitted on 27th October 2021 still relate to the revised application. These are set out below once more.

## **TALL BUILDINGS AND DESIGN**

### **1. TALL BUILDINGS**

Tall and large buildings are singled out in planning policy and subject to specific and stringent tests because of the inherent potential for the scale of these buildings to cause harmful effects.

These precise tall building policies are set out in the newly adopted London Plan 2021 and the newly adopted Lambeth Plan 2021.

The Lambeth Plan defines a tall building in any location north of the south circular (which includes Brixton town centre) as anything above 45m. The 20/21 storey tower element of this application would be 83.4m tall (95.6m AOD) but it fails to meet both London and Lambeth tall building policy.

The breaches of these policies are extensive and concern policy D9 of the London Plan and policies Q26, PN3 (site allocation 16) and the Brixton SPD of the Lambeth Plan as follows:

#### **D9(B)(3) 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'.**

Annex 10 referenced in policy Q26 (Tall Buildings) of the Lambeth Plan and informed by Topic Paper 8 (Lambeth Tall Buildings) is a series of maps showing locations in Lambeth considered appropriate for tall buildings. On the Brixton map, although 2 locations are identified (International House and the Canterbury Arms/Pop Brixton site) the application site is not. Even with regard to the 2 sites identified, which are further away from the Brixton Conservation Area than the application site, the general maximum building height recommended for these 2 locations is 65m AOD. **At 95.6m AOD, the 20 storey tower would be over 30m taller (47% taller) than this recommendation.**

Clearly this is a fundamental breach of London Plan policy D9.

In contradiction to London Plan policy D9, Lambeth's Local Plan makes provision for 'windfall' sites not identified in Annex 10, but the development is still required to meet all the stringent tests of policy Q26 of the Lambeth Plan and the remainder of policy D9 of the London Plan. Failure to meet those tests is evidenced below:

#### **D9 C 1) a) i) Make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views /Q26 a) (i) will not adversely impact on strategic or local views**

The view NNW from Brockwell Park looking towards Brixton is listed as view of local interest at policy Q25 C (i) of the Lambeth Local Plan 2021. Paragraph 8.2.34 of the Lambeth officers report acknowledges that the development would compromise the panoramic view from Brockwell Park. It states:

*" Its proximity and bulk makes for a much more dominant contribution to the view than anything in Brixton makes at present." Para 8.2.37 states that 'The view management objective is harmony – where no one element should dominate the view or block an appreciation of / compete with the landmarks. **The proposal would cause harm** because of the dominant scale and proximity to the*



viewer. It introduces unwelcome visual competition with the distant landmarks thus disrupting the view composition contrary to the objectives of Policy Q25, part (a) .... Given that harm to the significance of the view is identified, **the proposal does not meet the views test of Policy Q26, part (a), [i].**

Para 8.2.67 states that 'The proposal will be dominant in the middle grounds and, as identified in the views section (see paras 5.47 – 5.50) will have an **adverse impact on the local view.**'

The above demonstrates without doubt that the proposal would breach Lambeth policy Q26 part (a) (i) and London Plan policy D9 C 1) a) i) and would adversely affect (cause harm to) this important local view.

**D9 C 1) a) ii) mid-range views-make a positive contribution to the local townscape /Q26a) (iii) the proposal makes a positive contribution to public realm and townscape**

Para 8.2.31 of Lambeth Planning Officers report states that 'Modelling undertaken by the Council's Conservation and Design team has concluded that **the maximum height this site could reasonably accommodate without causing townscape and heritage harm was 14 storeys (57m AOD).** This is borne out by the Lambeth officers assessment.

In relation to the 26 views provided by the applicant in their Townscape, Historic and Visual Impact Assessment (THVIA) the Lambeth officers report reviewed 19 of these and concluded that in 15 cases (78% of cases), the impact on the heritage assets concerned would be negative and in relation to townscape, the report states:

8.2.56 (view 12) 'The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape.** The proposal would have a negative effect on the setting of St Matthew's Church in this view.

8.2.59 (view 14) The proposal adds a significant and prominent bulk to the skyline. It is large scale and dominant. If the view moves northward the Town Hall tower becomes a prominent terminating feature. In that view, the proposal will be visible with the LTH [Lambeth Town Hall]. The proposal would be of a competitive form in relation to the LTH tower. Together they frame the view down Acre Lane. However, as a landmark listed building and as a marker for the principal civic function of the Borough the primacy of the Town Hall tower is diminished – a negative effect on the setting results.

8.2.60 (view 12) the [Grade II Tate] library can be glimpsed through the trees in a homogenous low-rise **townscape** setting. The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape.** ....As a striking vertical element in an otherwise low-rise context it will be excessively dominant. The effect on the setting of the library will be negative.

8.2.61 (view 13) The Library and the other buildings (including Lambeth Town Hall behind the viewer) frame and define the junction and **share common characteristic of low form – 2 – 3 storeys and traditional architecture.** There is a broad, clear sky above. The proposal introduces a boxy, skyline form in the centre right of the view. **It visually competes with and draws the eye from the low-rise buildings including Tate Library.** The effect distracts the eye from the listed building.

8.2.62 (view 12) the Ritzy is seen through the trees in a **homogenous low-rise townscape setting.** The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape.** Whilst the trees screen in this particular viewpoint, should the viewer move across the road eastward into the northern corner of St Matthew's Peace Garden (by the Budd Mausoleum) the proposal will rise dominantly to the Behind the Ritzy much in the same way it does behind the Tate Library in Images 19 and 20. The effect on the setting of the Ritzy Cinema will be negative.

8.2.76 The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape.** The effect will be similar from much of Windrush Square / Effra Road. As a striking vertical element in an otherwise low-

*rise context it will be very dominant. It is considered a negative impact results to the setting of the BCA*

8.2.92 (view 26) *This architectural and **townscape dominance** is to the detriment of the built character of Electric Avenue 's locally listed buildings and to the detriment of the bustling, historic street market. The effect would actually worsen should the viewer move left – then the building will fill the entire view.*

8.2.94 *In summary, the proposal would be the predominant built form when viewed from much of the Brixton Conservation Area (BCA). It would introduce an **unwelcome visual competition to the historic civic character area south of Acre Lane/ Coldharbour Lane and to the north it would be oppressively dominant and distracting.***

8.2.113 *All of the affected undesignated heritage assets have been designated for their **townscape value** –the positive role they play in the street scene. This generally makes them positive contributors to the conservation areas in most instances too. In all the identified cases above, the effect of the proposal comes from its **physical dominance and the visual competition it introduces into the townscape.***

8.2.127 *The assessment of heritage impacts has shown that where heritage assets (designated and undesignated) have **townscape value**, the proposal generally has an **adverse impact** on their significance because of its dominance and the visual competition it would introduce. **These heritage impacts cannot be unpicked from the general townscape effect of undue dominance.***

The above demonstrates comprehensively that the proposal would have a negative impact on the Brixton townscape, contrary to London policy D9 C 1) a) ii) and Lambeth policy Q26a) (iii).

**D9 C 1) a) iii) immediate views from surrounding streets- where the edges of the site are adjacent to buildings of significantly lower height, there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy**

No such transition in scale exists- the form of the building is simply an extrusion from its footprint. The adjacent residential properties on Coldharbour Lane are some 14m lower in height than the 9 storey element of the proposed development. Walton Lodge is only 3 storeys high. This would result in severe adverse daylight amenity impacts for their residents which do not meet BRE guidelines. On average, the first three floors of the flats on Coldharbour Lane would have their VSC daylight levels reduced by 55%. The building would also be between 13m and 17m away from these properties and residents have raised legitimate concerns about resultant overlooking and privacy issues particularly since the top floor of the 9 storey element would be open to the public at night and the vast majority of rooms affected in the residential properties are bedrooms.

Clearly the proposed development is contrary to London Plan D9 1) a) iii).

**D9 C 1) b) reinforcement of spatial hierarchy**

As demonstrated above, and according to Lambeth planning officers' own assessment, the proposal is at odds with the low-rise nature of its townscape. The Lambeth Design and Conservation Area report states at para 5.2 'A 20 storey building with roughly the same setback as the existing single storey building will have an exceptionally oppressive effect on the user's spatial experience of this small urban space.

Clearly the proposed development would not reinforce existing spatial hierarchy and therefore also breaches this policy.

**D9 C 1) c) architectural quality and materials should be of an exemplary standard/Q26 a) (ii) design excellence is achieved (form, proportion, silhouette, detailing and materials etc)**

Relevant extracts from Lambeth planning officers report which evidence non-compliance are as follows (emphasis added):

8.2.125 In relation to Policy Q26, part (iii) [of the Lambeth Plan 2015] **the proposal does not achieve a design excellence in terms of its form – it is too tall and dominant, silhouette – (it is blocky and dominant) or detailing – (the diagrid at high level draws undue attention to the building).**

8.2.116 However, whilst it is often the case that considered detailing can lessen perceived bulk and play down the appearance of mass, as stated above it is often the sheer scale of the proposal (its oppressive bulk, scale and mass) that is problematic. For example, whilst the brick frame carrying relatively square windows is an attractive concept which responds well to the local context, when it is stretched over such large elevations it does not help to mitigate against the dominant mass of the building. This comes across particularly in the view from Atlantic Road at the Vining Street junction (View 23). It should be noted that Historic England also considers the façade to be too industrial in character due to the ‘repetitious windows and squat proportions’.

Although the architects have clearly studied and noted the prevalence of arched openings in neighbouring facades of Victorian architecture in the vicinity, and the use of brick, their replication does not translate well to a building of a completely different scale and form and results, as Historic England state, in a building that appears to be industrial in character and therefore not a response to its function. The building has been designed as if it were a factory. The Creative and Digital industries that it purports to serve are unlikely to be inspired by this architecture -the building design is unimaginative.

**D9 C 1) d) avoidance of harm to the significance of heritage assets and their settings or otherwise require clear and convincing justification and demonstrate that alternatives have been explored. The buildings should positively contribute to the character of the area**

Significant and widespread harm to heritage assets and their settings is demonstrated throughout the Lambeth officers report. Clear and convincing justification and demonstration of alternatives is not demonstrated.

Evidence of the harmful impact on the character of the area is demonstrated in the Lambeth officers report as follows (emphasis added):

8.2.10 Pope’s Road is currently a constrained and intimate space even with the existing single storey building. The proposed bulk and massing of the 20 storeys **would radically change the character of the space** and as a result the setting of the space’s contribution to the **significance of the BCA would be harmed.**

8.2.79 The assessment in para 5.108 – 5.116 explored the visual impacts on the setting of the CA when viewed from the southern side of the conservation area. The conclusion is a **negative effect on the setting due to the very high visibility and dominant appearance of the proposal over the special civic character area which is a key component of the conservation area.**

8.2.92 However, the combination of the height and the bold structural treatment of the upper floors of the West elevation draws the eye upward. Rather than the foreground historic market and locally listed buildings being the focal point of the view the viewer’s eyes are automatically drawn upwards to the rooftop of the proposal. **This architectural and townscape dominance is to the detriment of the built character of Electric Avenue’s locally listed buildings and to the detriment of the bustling, historic street market.** The effect would actually worsen should the viewer move left – then the building will fill the entire view. The effect on the setting of the BCA is negative.

8.2.94 In summary, the proposal would be the predominant built form when viewed from much of the Brixton Conservation Area (BCA). It would introduce an **unwelcome visual competition to the historic civic character** area south of Acre Lane/ Coldharbour Lane and to the north it would be oppressively dominant and distracting. **The effects on setting are overwhelmingly negative.**

In the words of Helen Hayes- local MP, ex town planner, former partner of a major architectural practice and former member of the Housing, Communities and Local Government Select Committee (emphasis added):

*The design of the building is not distinctive, it is indistinguishable from many other tall buildings across London. As such, it does not add to or enhance the character of the historic environment in central Brixton, or provide any expression of the uniqueness and diversity of the local community. If approved it will erode the distinctiveness of an area of London which is currently characterised by a unique mix of Victorian and Edwardian architecture, occupied by a diverse range of predominantly BAME-owned independent businesses.*

**D9 C 3) a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort ...../Q26 a) (v) the proposal adequately addresses the criteria in London Plan policy D9C in terms of acceptable visual, environmental and functional impacts including microclimate, wind turbulence, noise, daylight and sunlight,**

The Lambeth officers report identifies properties on Coldharbour Lane that will suffer ‘significant adversity’ with regard to daylight loss should the development go ahead where ‘the majority of reductions to daylight VSC and daylight distribution do not meet BRE Guide target criteria.’

According to the tests submitted by the applicant’s daylight and sunlight consultant, in total 120 windows would not meet the BRE guidelines for daylight VSC and a further 65 would not meet the BRE guidelines for daylight distribution. Of those, 57 windows would suffer from 40% or more reductions in levels of VSC daylight and 68 windows would have retained levels of VSC daylight of 15% or less. The majority of these windows belong to the residents of the flats in Coldharbour Lane – the very reason site allocation 16 proposes low buildings.

GIA RESULTS SUMMARY									
windows not meeting BRE guidelines				VSC Loss			VSC retained		
	VSC	NSL	APSH	20-30	30-40	40+	0-15	15-20	20-27
Granville Court	4	0	N/A	4	0	0	0	2	2
Valentia Place	2	0	0	1	1	0	2	0	0
368-372 Coldharbour Lane	73	53	0	15	11	47	39	24	10
Chartam Court	15	1	0	15	0	0	15	0	0
Westgate Court	8	0	2	2	2	4	1	7	0
Wincheap Court	0	1	0	0	0	0	0	0	0
28 Atlantic Road	2	0	0	2	0	0	0	0	2
Walton Lodge	16	10	0	5	5	6	11	3	2
<b>Total</b>	<b>120</b>	<b>65</b>	<b>2</b>	<b>44</b>	<b>19</b>	<b>57</b>	<b>68</b>	<b>36</b>	<b>16</b>

These impacts are unacceptable and neither the applicant’s consultants nor the independent sunlight and daylight advisor engaged by Lambeth (Schroeders Begg) presented these overall statistics to the Lambeth Planning Applications Committee (PAC).

Furthermore, despite the fact that BRE guidelines state that “*The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight*” no sunlight or daylight tests were carried out on adjacent public buildings which significantly include statutory listed buildings Brixton Recreation Centre and Brixton Village which rely on overhead natural daylight and sunlight.

The wind report submitted by the applicant states that “*With the inclusion of the Proposed Development, there would be a significant change in the aerodynamics on-Site, resulting in a general increase of the wind speeds around the Site.*” It acknowledges that wind mitigation measures would be necessary and yet the analysis of the wind tests carried out with those mitigation measures in place fails to include upper level locations in the winter (the windiest season) – these locations would include the train station platforms and the terraces and podium of the Brixton Recreation Centre. Concerns about the wind impact of the building in these specific locations were raised by at least one objector as reported in the officers report, but this objection was dismissed by the response ‘A wind assessment has been submitted with the application which concludes that the wind impacts of the

*development are acceptable*'. At the 2nd Lambeth PAC meeting, one of the planning officers stated that " *Both the applicants' and the **council's technical experts** are satisfied that a final package of appropriate wind mitigation measures can be secured to address policy requirements.*" The fact that the council's technical experts failed to spot that the tests carried out on behalf of the application did not take into consideration of these locations calls into question whether the condition placed on the application would be properly scrutinised, should the application be approved.

A recent development at 8 Albert Embankment ,where residential amenity issues were prevalent, was refused planning by the Secretary of State. The conclusion was that the development breached LLP policy Q2- in other words, the impacts were deemed unacceptable. In this case only 24 windows would have suffered major adverse impact compared to 57 in this case.

The above demonstrates that the application breaches both the London Plan and the Lambeth Plan in terms of sunlight and daylight impacts and that in terms of wind comfort, insufficient analysis was carried out on specific locations to demonstrate compliance.

### **Lambeth policy PN3**

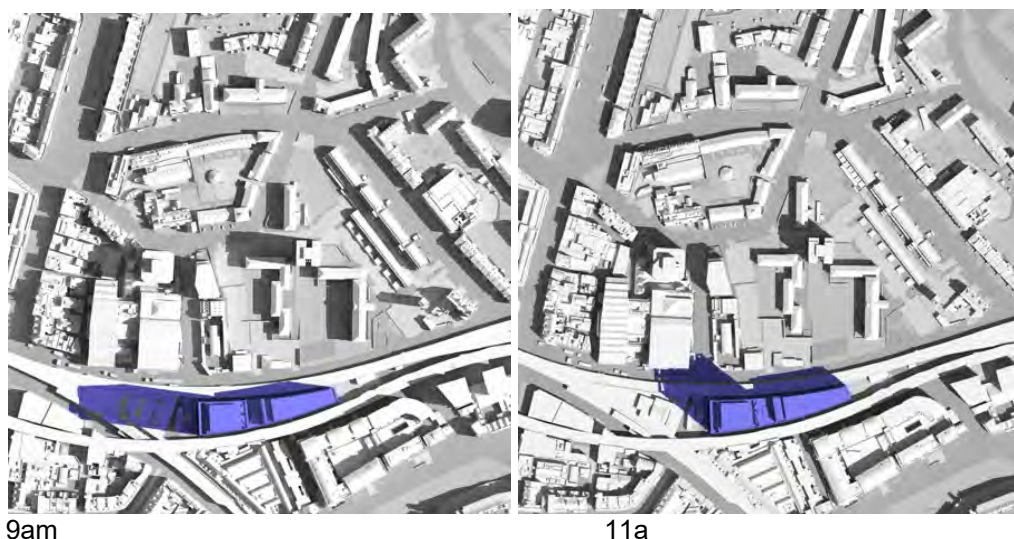
The proposal also fails to meet policy PN3 (K) of the Lambeth Plan. The site allocation for Site 16 (Brixton Central – between the viaducts) includes the application site and under the heading 'design principles and key development considerations', it states that the council will support development on the site that:

*(ix) avoids creating a canyon on either side of the railway viaducts;*

*(x) proposes low buildings to protect the amenity of new residential development on Coldharbour Lane adjoining the site.'*

The pedestrian area on Popes Road between the Catford Loop/Chatham railway viaduct and the Atlantic/Overground railway viaduct is already enclosed on 3 sides by those viaducts and on a third side by an office building. The fact that the existing building on the application site is only one storey high means that natural daylight and sunlight currently penetrates into this pedestrian area. Enclosing the 4th side with a 20 storey tower building, will severely block this natural light and indeed create an oppressive canyon effect, contrary to site allocation 16 (ix). This issue was raised in objections made by the Carney Place/Milles Square residents association and by Brixton Market Traders Federation (who operate from the street market on Brixton Station Road) but was dismissed in the Lambeth officers report and dismissed at PAC2 when raised by one of the PAC members.

Extracts below from the applicant's sunlight and daylight report reveals, the development would plunge the Popes road pedestrian area and Brixton Station Road into shadow during the summer months. These images show the impact at 9am and 11am on 21st June.



This canyon effect is also contrary to Lambeth Plan policy Q7 (Urban Design- new development):

*New development (new buildings and conversion schemes) will generally be supported if:....  
viii. it would not create canyon-like development especially along streets and railway lines*

The application, as submitted, acknowledges that it is a departure from policy with regard to site allocation 16 (x).

## **2. DESIGN**

### **2.1 Design Led Approach**

Policy D3 of the London Plan 2021 (Optimising site capacity through the design-led approach) states that:

*D Development proposals should:*

*1) enhance local context by delivering buildings and spaces that **positively respond to local distinctiveness** through their layout, orientation, scale, appearance and shape, with due regard to **existing** and emerging **street hierarchy**, building types, **forms and proportions***

*11) respond to the existing **character of a place** by identifying the **special and valued features and characteristics that are unique to the locality** and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local **character***

Contrary to London Plan policy D3, The development would not enhance local context (harm is identified) or respond to local distinctiveness or character, as evidenced in section 1 and throughout the planning officers report.

Policy Q5 of the Lambeth Plan 2021 (Local distinctiveness) states that:

*A. The **local distinctiveness** of Lambeth should be sustained and reinforced through new development.*

*B. Proposals will be supported where it is shown that design of development is a creative and innovative contextual response to positive aspects of the locality and historic character in terms of:*

- i. urban block and grain, patterns of space and relationship, townscape/ landscape character;*
- ii. **built form (bulk, scale, height and massing)** including roofscapes;*
- iii. siting, orientation and layout and **relationship with other buildings and spaces**;*
- iv. the use of low maintenance, robust and durable walling materials; and*
- v. quality and architectural detailing (including fenestration and articulation)*

*C. Where development proposals deviate from locally distinct development patterns, applicants will be required to show in their design/heritage statements that:*

- i. the proposal clearly **delivers design excellence**; and*
- ii. will make a positive contribution to its local and historic context.*

As evidenced by extracts from the planning officers report quoted in section 1 above , the development would be at odds with the existing low rise townscape , which would be to the detriment of its built character and as Historic England have said '*it is the scale and massing which are its inherent flaws.*'. The planning officers do not consider that the meets the required standard of excellence.

The development would therefore breach of policy Q5 of the Local Plan and policy D3 of the London Plan.

### **2.2 Design Review Panel**

Policy D9 of the London Plan also states at para 3.9.4 that

*The higher the building the greater the level of **scrutiny** that is required of its design. In addition, **tall buildings that are referable to the Mayor**, must be subject to the particular design scrutiny requirements set out in Part D of Policy D4 -Delivering Good Design.*

Policy D4 para E states that:

*The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:*

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*
- 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme*
- 3) **where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews***
- 4) **design review recommendations are appropriately recorded and communicated to officers and decision makers***
- 5) schemes show how they have considered and addressed the design review recommendations*
- 6) **planning decisions demonstrate how design review has been addressed.***

The minutes of the pre-application Design Review Panel (DRP) meeting that took place on 18<sup>th</sup> February 2020 were not disclosed to the Planning Application Committee (PAC), but were obtained via an FOI request together with Lambeth officers' briefing notes to that meeting.

This reveals that the Lambeth briefing notes to the DRP's meeting, when the building stood at part 22 storey, part 9 storey height, stated that (emphasis added):

*5.1 Officers support redevelopment of the site however there are concerns about the proposals height, bulk and silhouette and its impact on the surrounding townscape and harm to heritage assets. Officers are seeking a reduction in height to lessen the visual impact and harm to the setting of heritage assets. **A reduction to 14 storeys is recommended** – this height would be comparable with other nearby tall buildings (other nearby tall buildings (International House, Brixton Station Road) and allow the development to sit more comfortably within the local townscape.*

And the minutes from that DRP meeting record the panel's views as follows:

*2.10 The proposed height and mass is considered **unacceptably assertive and unacceptable in terms of local townscape and heritage impact**. The panel welcomed the proposed removal of some storeys proposed at the review. However, the panel notes the **further reductions are required** to address the harmful heritage and townscape impact.*

These further reductions in storey height as recommended by the DRP did not materialise. As evidenced at para 5.42 of Lambeth's Design and Conservation report (obtained by FOI request) 'The original pre-application submission was for G+21 storeys. The applicant has reduced this to G+19 with changes to ceiling heights'.

And although the minutes of the DRP meeting state that 'The Panel look forward to reviewing the scheme in the near future as the design progresses', no such further review took place according to the Planning Performance Agreement programme (obtained by FOI request). The minutes and reports from the technical briefings held on 14 Aug and 16 Oct 2020 (obtained via FOI requests), reveal that no mention was made of the DRPs views on the height and mass of the building at these technical briefings. Although the Lambeth officers report refers to other comments made by the Design Review Panel, it crucially fails to mention the DRPs views on the height and mass of the building.

Contrary to London Plan policy D4 E 4) full design review recommendations were not communicated to the Lambeth PAC before they took their decision.



## 2.2 Design Codes

At para 134 of the NPPF 2021 , it states that:

*Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.*

Para 49 of the National Model Design Code 2021 Part 2 ('Tall Buildings Design Principles') states that:

*Tall buildings are, by their nature, one-offs and need to be designed to the **highest architectural quality** because of their prominence. They can be designed in a variety of architectural styles, but the following principles apply to all tall buildings:*

***Top:** The top of the building and its impact on the skyline needs to be carefully considered. Services needs to be concealed and **both the street views and the long views need to be considered.***

***Form:** The form and silhouette of the building needs to be considered. The long and short elevations need to be **well-proportioned in terms of their slenderness.***

As evidenced in section 1, Lambeth officers do not consider that the proposal achieves design excellence and harm to street and long range views is evidenced. The height of the 20 storey tower is only approximately 3 times its width.

The February 2020 draft Lambeth Design Code SPD Part 3 states that:

*3.4 Designers should guard against over development by ensuring the development capacity of the site is optimised and not exceeded. Over development, especially at high density, leads to poor outcomes not just on site but for the wider community. This can include insufficient amenity spaces, poor daylight sunlight or excessive pressure on public realm and infrastructure. **Designers need to be able to show how they have achieved optimum density. The first step is ensuring all established planning policy and other development standards are met.***

*3.10 With the need for continued growth in Lambeth and in recognition that London's character is ever-evolving much of the new development coming forward is going to be taller than its current context. In some instances development may be substantially taller.*

*Designers should:*

- 1. Consider **stepping massing down in sensitive locations** where it would be desirable to respond positively to established context; especially **heritage assets and conservation areas.***
- 2. Ensure the built forms work in **immediate and longer views.***
- 3. Use locally distinct materials and careful proportions to aid visual integration with local context.*

*3.28 ....Given that tall buildings are by their definition 'substantially taller' than their context their impact is undoubtedly going to be greater.*

*Designers should:*

- 2. Guard against outcomes that **loom uncomfortably over existing low-rise neighbours**  
[...]*
- 5. **Seek elegant and well-proportioned architectural outcomes** which unify the top, middle and base into a coherent whole.*

**6. Mitigate against potential adverse impacts – wind, micro-climate, daylight and sunlight etc. through design excellence.**

The building is in a sensitive location being immediately adjacent to the Brixton Conservation, but yet the highest part of the building is located at that boundary. Neither does the building mitigate against adverse impacts. The building would indeed loom over its existing low-rise neighbours and cast long and large shadows over the town centre

The Brixton SPD is under review but in relation to tall buildings the adopted Brixton SPD 2013 states at para 4.1.2 that (emphasis added):

*Tall building development on suitable sites, to a height of 10 storeys, is likely to have a neutral impact on Brixton's heritage assets (and their settings). Development between 10 and 15 storeys will be visible from within the conservation area and has the potential to have an adverse impact. **Development in excess of 15 storeys is likely to have a significant adverse impact. Large, bulky, squat or alien looking structures are unlikely to be considered acceptable. In order to mitigate such harm, new tall buildings should be slender, of elegant proportions and with a good silhouette.***

The design of the building is neither slender nor elegant. Both blocks are crude extrusions from its footprint which results in an equally crude silhouette..

The above demonstrates that the design fails to meet national, regional and local design codes and policies let alone achieve the level of excellence required by Lambeth policy Q26 and the exemplary standard required by London Plan policy D9.

## **SUMMARY**

When Sir David Adjaye, signed Skyline campaign's statement on 29 March 2014, he agreed that implementation of [tall building] policy is 'fragmented and weak' and this had resulted in buildings which are 'hugely prominent and grossly insensitive to their immediate context and appearance on the skyline'. This quote describes the building designed for Hondo Enterprises in the centre of Brixton on a site which Lambeth Council consider not to be appropriate for tall buildings.

If this application were to be approved it would set a damaging precedent for further tall buildings in the area and across London.

Quite clearly the application in front of the Mayor flies in the face of London and Lambeth tall building policy. It is precisely the sort of development that these policies are designed to prevent and I would urge to the Mayor to refuse this application.

[REDACTED]

Written representation submitted by:



## **TALL BUILDINGS AND DESIGN**

### **1. TALL BUILDINGS**

Tall and large buildings are singled out in planning policy and subject to specific and stringent tests because of the inherent potential for the scale of these buildings to cause harmful effects.

These precise tall building policies are set out in the newly adopted London Plan 2021 and the newly adopted Lambeth Plan 2021.

The Lambeth Plan defines a tall building in any location north of the south circular (which includes Brixton town centre) as anything above 45m. The 20/21 storey tower element of this application would be 83.4m tall (95.6m AOD) but it fails to meet both London and Lambeth tall building policy.

The breaches of these policies are extensive and concern policy D9 of the London Plan and policies Q26, PN3 (site allocation 16) and the Brixton SPD of the Lambeth Plan as follows:

#### **D9(B)(3) 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'.**

Annex 10 referenced in policy Q26 (Tall Buildings) of the Lambeth Plan and informed by Topic Paper 8 (Lambeth Tall Buildings) is a series of maps showing locations in Lambeth considered appropriate for tall buildings. On the Brixton map, although 2 locations are identified (International House and the Canterbury Arms/Pop Brixton site) the application site is not. Even with regard to the 2 sites identified, which are further away from the Brixton Conservation Area than the application site, the general maximum building height recommended for these 2 locations is 65m AOD. **At 95.6m AOD, the 20 storey tower would be over 30m taller (47% taller) than this recommendation.**

Clearly this is a fundamental breach of London Plan policy D9.

In contradiction to London Plan policy D9, Lambeth's Local Plan makes provision for 'windfall' sites not identified in Annex 10, but the development is still required to meet all the stringent tests of policy Q26 of the Lambeth Plan and the remainder of policy D9 of the London Plan. Failure to meet those tests is evidenced below:

#### **D9 C 1) a) i) Make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views /Q26 a) (i) will not adversely impact on strategic or local views**

The view NNW from Brockwell Park looking towards Brixton is listed as view of local interest at policy Q25 C (i) of the Lambeth Local Plan 2021. Paragraph 8.2.34 of the Lambeth officers report acknowledges that the development would compromise the panoramic view from Brockwell Park. It states:

*" Its proximity and bulk makes for a much more dominant contribution to the view than anything in Brixton makes at present." Para 8.2.37 states that 'The view management objective is harmony – where no one element should dominate the view or block an appreciation of / compete with the landmarks. **The proposal would cause harm** because of the dominant scale and proximity to the viewer. It introduces unwelcome visual competition with the distant landmarks thus disrupting the view composition contrary to the objectives of Policy Q25, part (a) .... Given that harm to the significance of the view is identified, **the proposal does not meet the views test of Policy Q26, part (a), [i].***

Para 8.2.67 states that *'The proposal will be dominant in the middle grounds and, as identified in the views section (see paras 5.47 – 5.50) will have an **adverse impact on the local view.**'*

The above demonstrates without doubt that the proposal would breach Lambeth policy Q26 part (a) (i) and London Plan policy D9 C 1) a) i) and would adversely affect (cause harm to) this important local view.

**D9 C 1) a) ii) mid-range views-make a positive contribution to the local townscape /Q26a) (iii) the proposal makes a positive contribution to public realm and townscape**

Para 8.2.31 of Lambeth Planning Officers report states that ‘*Modelling undertaken by the Council’s Conservation and Design team has concluded that **the maximum height this site could reasonably accommodate without causing townscape and heritage harm was 14 storeys (57m AOD)***’. This is borne out by the Lambeth officers assessment.

In relation to the 26 views provided by the applicant in their Townscape, Historic and Visual Impact Assessment (THVIA) the Lambeth officers report reviewed 19 of these and concluded that in 15 cases (78% of cases), the impact on the heritage assets concerned would be negative and in relation to townscape, the report states:

8.2.56 (view 12) ‘*The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape**. The proposal would have a negative effect on the setting of St Matthew’s Church in this view.*

8.2.59 (view 14) *The proposal adds a significant and prominent bulk to the skyline. It is large scale and dominant. If the view moves northward the Town Hall tower becomes a prominent terminating feature. In that view, the proposal will be visible with the LTH [Lambeth Town Hall]. The proposal would be of a competitive form in relation to the LTH tower. Together they frame the view down Acre Lane. However, as a landmark listed building and as a marker for the principal civic function of the Borough the primacy of the Town Hall tower is diminished – a negative effect on the setting results.*

8.2.60 (view 12) *the [Grade II Tate] library can be glimpsed through the trees in a homogenous low-rise **townscape** setting. The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape**. ....As a striking vertical element in an otherwise low-rise context it will be excessively dominant. The effect on the setting of the library will be negative.*

8.2.61 (view 13) *The Library and the other buildings (including Lambeth Town Hall behind the viewer) frame and define the junction and **share common characteristic of low form – 2 – 3 storeys and traditional architecture**. There is a broad, clear sky above. The proposal introduces a boxy, skyline form in the centre right of the view. **It visually competes with and draws the eye from the low-rise buildings including Tate Library**. The effect distracts the eye from the listed building.*

8.2.62 (view 12) *the Ritzy is seen through the trees in a **homogenous low-rise townscape setting**. The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape**. Whilst the trees screen in this particular viewpoint, should the viewer move across the road eastward into the northern corner of St Matthew’s Peace Garden (by the Budd Mausoleum) the proposal will rise dominantly to the Behind the Ritzy much in the same way it does behind the Tate Library in Images 19 and 20. The effect on the setting of the Ritzy Cinema will be negative.*

8.2.76 *The proposal is a significant, dominant presence through the trees and in terms of bulk, scale and mass it is **at odds with the low-rise historic townscape**. The effect will be similar from much of Windrush Square / Effra Road. As a striking vertical element in an otherwise low-rise context it will be very dominant. It is considered a negative impact results to the setting of the BCA*

8.2.92 (view 26) *This architectural and **townscape dominance** is to the detriment of the built character of Electric Avenue ‘s locally listed buildings and to the detriment of the bustling,*

*historic street market. The effect would actually worsen should the viewer move left – then the building will fill the entire view.*

8.2.94 *In summary, the proposal would be the predominant built form when viewed from much of the Brixton Conservation Area (BCA). It would introduce an **unwelcome visual competition to the historic civic character area south of Acre Lane/ Coldharbour Lane and to the north it would be oppressively dominant and distracting.***

8.2.113 *All of the affected undesignated heritage assets have been designated for their **townscape value** –the positive role they play in the street scene. This generally makes them positive contributors to the conservation areas in most instances too. In all the identified cases above, the effect of the proposal comes from its **physical dominance and the visual competition it introduces into the townscape.***

8.2.127 *The assessment of heritage impacts has shown that where heritage assets (designated and undesignated) have **townscape value**, the proposal generally has an **adverse impact** on their significance because of its dominance and the visual competition it would introduce. **These heritage impacts cannot be unpicked from the general townscape effect of undue dominance.***

The above demonstrates comprehensively that the proposal would have a negative impact on the Brixton townscape, contrary to London policy D9 C 1) a) ii) and Lambeth policy Q26a) (iii).

**D9 C 1) a) iii) immediate views from surrounding streets--where the edges of the site are adjacent to buildings of significantly lower height, there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy**

No such transition in scale exists--the form of the building is simply an extrusion from its footprint. The adjacent residential properties on Coldharbour Lane are some 14m lower in height than the 9 storey element of the proposed development. Walton Lodge is only 3 storeys high. This would result in severe adverse daylight amenity impacts for their residents which do not meet BRE guidelines. On average, the first three floors of the flats on Coldharbour Lane would have their VSC daylight levels reduced by 55%. The building would also be between 13m and 17m away from these properties and residents have raised legitimate concerns about resultant overlooking and privacy issues particularly since the top floor of the 9 storey element would be open to the public at night and the vast majority of rooms affected in the residential properties are bedrooms.

Clearly the proposed development is contrary to London Plan D9 1) a) iii).

**D9 C 1) b) reinforcement of spatial hierarchy**

As demonstrated above, and according to Lambeth planning officers' own assessment, the proposal is at odds with the low-rise nature of its townscape. The Lambeth Design and Conservation Area report states at para 5.2 'A 20 storey building with roughly the same setback as the existing single storey building will have an exceptionally oppressive effect on the user's spatial experience of this small urban space.

Clearly the proposed development would not reinforce existing spatial hierarchy and therefore also breaches this policy.

**D9 C 1) c) architectural quality and materials should be of an exemplary standard/Q26 a) (ii) design excellence is achieved (form, proportion, silhouette, detailing and materials etc)**

Relevant extracts from Lambeth planning officers report which evidence non-compliance are as follows (emphasis added):

8.2.125 *In relation to Policy Q26, part (iii) [of the Lambeth Plan 2015] **the proposal does not achieve a design excellence in terms of its form – it is too tall and dominant, silhouette – (it is blocky and dominant) or detailing – (the diagrid at high level draws undue attention to the building).***

8.2.116 However, whilst it is often the case that considered detailing can lessen perceived bulk and play down the appearance of mass, as stated above it is often the sheer scale of the proposal (its oppressive bulk, scale and mass) that is problematic. For example, whilst the brick frame carrying relatively square windows is an attractive concept which responds well to the local context, when it is stretched over such large elevations it does not help to mitigate against the dominant mass of the building. This comes across particularly in the view from Atlantic Road at the Vining Street junction (View 23). It should be noted that Historic England also considers the façade to be too industrial in character due to the ‘repetitious windows and squat proportions’.

Although the architects have clearly studied and noted the prevalence of arched openings in neighbouring facades of Victorian architecture in the vicinity, and the use of brick, their replication does not translate well to a building of a completely different scale and form and results, as Historic England state, in a building that appears to be industrial in character and therefore not a response to its function. The building has been designed as if it were a factory. The Creative and Digital industries that it purports to serve are unlikely to be inspired by this architecture -the building design is unimaginative.

**D9 C 1) d) avoidance of harm to the significance of heritage assets and their settings or otherwise require clear and convincing justification and demonstrate that alternatives have been explored. The buildings should positively contribute to the character of the area**

Significant and widespread harm to heritage assets and their settings is demonstrated throughout the Lambeth officers report. Clear and convincing justification and demonstration of alternatives is not demonstrated.

Evidence of the harmful impact on the character of the area is demonstrated in the Lambeth officers report as follows (emphasis added):

8.2.10 Pope’s Road is currently a constrained and intimate space even with the existing single storey building. The proposed bulk and massing of the 20 storeys **would radically change the character of the space and as a result the setting of the space’s contribution to the significance of the BCA would be harmed.**

8.2.79 The assessment in para 5.108 – 5.116 explored the visual impacts on the setting of the CA when viewed from the southern side of the conservation area. The conclusion is a **negative effect on the setting due to the very high visibility and dominant appearance of the proposal over the special civic character area which is a key component of the conservation area.**

8.2.92 However, the combination of the height and the bold structural treatment of the upper floors of the West elevation draws the eye upward. Rather than the foreground historic market and locally listed buildings being the focal point of the view the viewer’s eyes are automatically drawn upwards to the rooftop of the proposal. **This architectural and townscape dominance is to the detriment of the built character of Electric Avenue’s locally listed buildings and to the detriment of the bustling, historic street market.** The effect would actually worsen should the viewer move left – then the building will fill the entire view. The effect on the setting of the BCA is negative.

8.2.94 In summary, the proposal would be the predominant built form when viewed from much of the Brixton Conservation Area (BCA). It would introduce an **unwelcome visual competition to the historic civic character area south of Acre Lane/ Coldharbour Lane and to the north it would be oppressively dominant and distracting. The effects on setting are overwhelmingly negative.**

In the words of Helen Hayes--local MP, ex town planner, former partner of a major architectural practice and former member of the Housing, Communities and Local Government Select Committee (emphasis added):

*The design of the building is not distinctive, it is indistinguishable from many other tall buildings across London. As such, it does not add to or enhance the character of the historic environment in central Brixton, or provide any expression of the uniqueness and diversity of the local community. If approved it will erode the distinctiveness of an area of London which is currently characterised by a unique mix of Victorian and Edwardian architecture, occupied by a diverse range of predominantly BAME-owned independent businesses.*

**D9 C 3) a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort ...../Q26 a) (v) the proposal adequately addresses the criteria in London Plan policy D9C in terms of acceptable visual, environmental and functional impacts including microclimate, wind turbulence, noise, daylight and sunlight,**

The Lambeth officers report identifies properties on Coldharbour Lane that will suffer 'significant adversity' with regard to daylight loss should the development go ahead where 'the majority of reductions to daylight VSC and daylight distribution do not meet BRE Guide target criteria.'

According to the tests submitted by the applicant's daylight and sunlight consultant, in total 120 windows would not meet the BRE guidelines for daylight VSC and a further 65 would not meet the BRE guidelines for daylight distribution. Of those, 57 windows would suffer from 40% or more reductions in levels of VSC daylight and 68 windows would have retained levels of VSC daylight of 15% or less. The majority of these windows belong to the residents of the flats in Coldharbour Lane – the very reason site allocation 16 proposes low buildings.

GIA RESULTS SUMMARY									
windows not meeting BRE guidelines				VSC Loss			VSC retained		
	VSC	NSL	APSH	20-30	30-40	40+	0-15	15-20	20-27
Granville Court	4	0	N/A	4	0	0	0	2	2
Valentia Place	2	0	0	1	1	0	2	0	0
368-372 Coldharbour Lane	73	53	0	15	11	47	39	24	10
Chartam Court	15	1	0	15	0	0	15	0	0
Westgate Court	8	0	2	2	2	4	1	7	0
Wincheap Court	0	1	0	0	0	0	0	0	0
28 Atlantic Road	2	0	0	2	0	0	0	0	2
Walton Lodge	16	10	0	5	5	6	11	3	2
<b>Total</b>	<b>120</b>	<b>65</b>	<b>2</b>	<b>44</b>	<b>19</b>	<b>57</b>	<b>68</b>	<b>36</b>	<b>16</b>

These impacts are unacceptable and neither the applicant's consultants nor the independent sunlight and daylight advisor engaged by Lambeth (Schroeders Begg) presented these overall statistics to the Lambeth Planning Applications Committee (PAC).

Furthermore, despite the fact that BRE guidelines state that "*The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight*" no sunlight or daylight tests were carried out on adjacent public buildings which significantly include statutory listed buildings Brixton Recreation Centre and Brixton Village which rely on overhead natural daylight and sunlight.

The wind report submitted by the applicant states that "*With the inclusion of the Proposed Development, there would be a significant change in the aerodynamics on-Site, resulting in a general increase of the wind speeds around the Site.*" It acknowledges that wind mitigation measures would be necessary and yet the analysis of the wind tests carried out with those mitigation measures in place fails to include upper level locations in the winter (the windiest season) – these locations would include the train station platforms and the terraces and podium of the Brixton Recreation Centre. Concerns about the wind impact of the building in these specific locations were raised by at least one objector as reported in the officers report, but this objection was dismissed by the response 'A wind assessment has been submitted with the application which concludes that the wind impacts of the development are acceptable'. At the 2nd Lambeth PAC meeting, one of the planning officers stated that "Both the applicants' and the **council's technical experts** are satisfied that a final package of appropriate wind mitigation measures can be secured to address policy requirements.' The fact that the council's technical experts failed to spot that the tests carried out on behalf of the application did



not take into consideration of these locations calls into question whether the condition placed on the application would be properly scrutinised, should the application be approved.

A recent development at 8 Albert Embankment, where residential amenity issues were prevalent, was refused planning by the Secretary of State. The conclusion was that the development breached LLP policy Q2—in other words, the impacts were deemed unacceptable. In this case only 24 windows would have suffered major adverse impact compared to 57 in this case.

The above demonstrates that the application breaches both the London Plan and the Lambeth Plan in terms of sunlight and daylight impacts and that in terms of wind comfort, insufficient analysis was carried out on specific locations to demonstrate compliance.

### **Lambeth policy PN3**

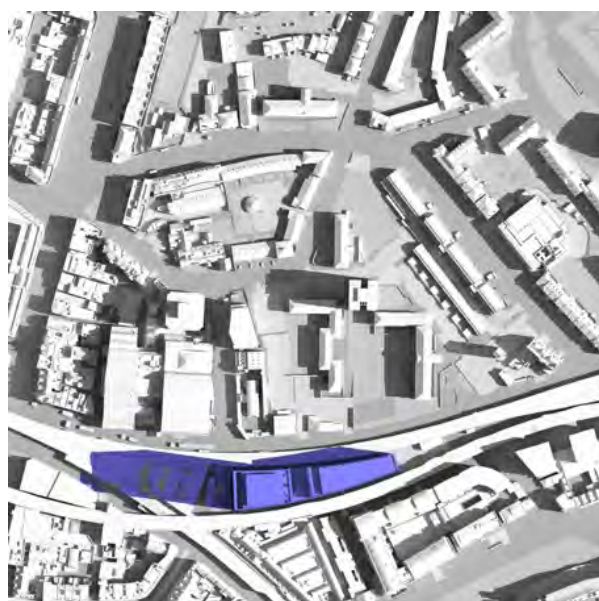
The proposal also fails to meet policy PN3 (K) of the Lambeth Plan. The site allocation for Site 16 (Brixton Central – between the viaducts) includes the application site and under the heading 'design principles and key development considerations', it states that the council will support development on the site that:

*(ix) avoids creating a canyon on either side of the railway viaducts;*

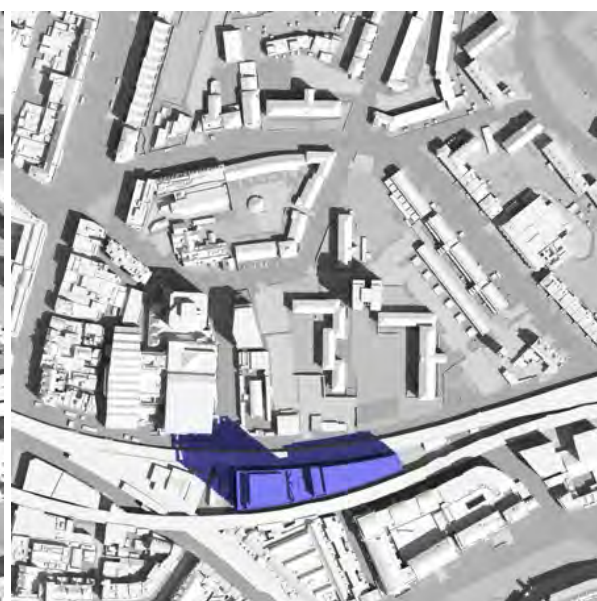
*(x) proposes low buildings to protect the amenity of new residential development on Coldharbour Lane adjoining the site.'*

The pedestrian area on Popes Road between the Catford Loop/Chatham railway viaduct and the Atlantic/Overground railway viaduct is already enclosed on 3 sides by those viaducts and on a third side by an office building. The fact that the existing building on the application site is only one storey high means that natural daylight and sunlight currently penetrates into this pedestrian area. Enclosing the 4th side with a 20 storey tower building, will severely block this natural light and indeed create an oppressive canyon effect, contrary to site allocation 16 (ix). This issue was raised in objections made by the Carney Place/Milles Square residents association and by Brixton Market Traders Federation (who operate from the street market on Brixton Station Road) but was dismissed in the Lambeth officers report and dismissed at PAC2 when raised by one of the PAC members.

Extracts below from the applicant's sunlight and daylight report reveals, the development would plunge the Popes road pedestrian area and Brixton Station Road into shadow during the summer months. These images show the impact at 9am and 11am on 21st June.



9am



11am

This canyon effect is also contrary to Lambeth Plan policy Q7 (Urban Design--new development):

*New development (new buildings and conversion schemes) will generally be supported if:....  
viii. it would not create canyon-like development especially along streets and railway lines*

The application, as submitted, acknowledges that it is a departure from policy with regard to site allocation 16 (x).

## **2. DESIGN**

### **2.1 Design Led Approach**

Policy D3 of the London Plan 2021 (Optimising site capacity through the design-led approach) states that:

*D Development proposals should:*

*1) enhance local context by delivering buildings and spaces that **positively respond to local distinctiveness** through their layout, orientation, scale, appearance and shape, with due regard to **existing** and emerging **street hierarchy**, building types, **forms and proportions***

*11) respond to the existing **character of a place** by identifying the **special and valued features and characteristics that are unique to the locality** and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local **character***

Contrary to London Plan policy D3, The development would not enhance local context (harm is identified) or respond to local distinctiveness or character, as evidenced in section 1 and throughout the planning officers report.

Policy Q5 of the Lambeth Plan 2021 (Local distinctiveness) states that:

*A. The **local distinctiveness** of Lambeth should be sustained and reinforced through new development.*

*B. Proposals will be supported where it is shown that design of development is a creative and innovative contextual response to positive aspects of the locality and historic character in terms of:*

- i. urban block and grain, patterns of space and relationship, townscape/ landscape character;*
- ii. **built form (bulk, scale, height and massing)** including roofscapes;*
- iii. siting, orientation and layout and **relationship with other buildings and spaces**;*
- iv. the use of low maintenance, robust and durable walling materials; and*
- v. quality and architectural detailing (including fenestration and articulation)*

*C. Where development proposals deviate from locally distinct development patterns, applicants will be required to show in their design/heritage statements that:*

- i. the proposal clearly **delivers design excellence**; and*
- ii. will make a positive contribution to its local and historic context.*

As evidenced by extracts from the planning officers report quoted in section 1 above , the development would be at odds with the existing low rise townscape , which would be to the detriment of its built character and as Historic England have said '*it is the scale and massing which are its inherent flaws.*'. The planning officers do not consider that the meets the required standard of excellence.

The development would therefore breach of policy Q5 of the Local Plan and policy D3 of the London Plan.

### **2.2 Design Review Panel**

Policy D9 of the London Plan also states at para 3.9.4 that

*The higher the building the greater the level of **scrutiny** that is required of its design. In addition, **tall buildings that are referable to the Mayor**, must be subject to the particular design scrutiny requirements set out in Part D of Policy D4 -Delivering Good Design.*

Policy D4 para E states that:

*The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:*

- 1) design reviews are carried out transparently by independent experts in relevant disciplines*
- 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme*
- 3) **where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews***
- 4) **design review recommendations are appropriately recorded and communicated to officers and decision makers***
- 5) schemes show how they have considered and addressed the design review recommendations*
- 6) **planning decisions demonstrate how design review has been addressed.***

The minutes of the pre-application Design Review Panel (DRP) meeting that took place on 18<sup>th</sup> February 2020 were not disclosed to the Planning Application Committee (PAC), but were obtained via an FOI request together with Lambeth officers' briefing notes to that meeting.

This reveals that the Lambeth briefing notes to the DRP's meeting, when the building stood at part 22 storey, part 9 storey height, stated that (emphasis added):

*5.1 Officers support redevelopment of the site however there are concerns about the proposals height, bulk and silhouette and its impact on the surrounding townscape and harm to heritage assets. Officers are seeking a reduction in height to lessen the visual impact and harm to the setting of heritage assets. **A reduction to 14 storeys is recommended** – this height would be comparable with other nearby tall buildings (other nearby tall buildings (International House, Brixton Station Road) and allow the development to sit more comfortably within the local townscape.*

And the minutes from that DRP meeting record the panel's views as follows:

*2.10 The proposed height and mass is considered **unacceptably assertive and unacceptable in terms of local townscape and heritage impact**. The panel welcomed the proposed removal of some storeys proposed at the review. However, the panel notes the **further reductions are required** to address the harmful heritage and townscape impact.*

These further reductions in storey height as recommended by the DRP did not materialise. As evidenced at para 5.42 of Lambeth's Design and Conservation report (obtained by FOI request) 'The original pre-application submission was for G+21 storeys. The applicant has reduced this to G+19 with changes to ceiling heights'.

And although the minutes of the DRP meeting state that 'The Panel look forward to reviewing the scheme in the near future as the design progresses', no such further review took place according to the Planning Performance Agreement programme (obtained by FOI request). The minutes and reports from the technical briefings held on 14 Aug and 16 Oct 2020 (obtained via FOI requests), reveal that no mention was made of the DRPs views on the height and mass of the building at these technical briefings. Although the Lambeth officers report refers to other comments made by the Design Review Panel, it crucially fails to mention the DRPs views on the height and mass of the building.

Contrary to London Plan policy D4 E 4) full design review recommendations were not communicated to the Lambeth PAC before they took their decision.

## 2.2 Design Codes

At para 134 of the NPPF 2021 , it states that:

*Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.*

Para 49 of the National Model Design Code 2021 Part 2 ('Tall Buildings Design Principles') states that:

*Tall buildings are, by their nature, one-offs and need to be designed to the **highest architectural quality** because of their prominence. They can be designed in a variety of architectural styles, but the following principles apply to all tall buildings:*

***Top:** The top of the building and its impact on the skyline needs to be carefully considered. Services needs to be concealed and **both the street views and the long views need to be considered.***

***Form:** The form and silhouette of the building needs to be considered. The long and short elevations need to be **well-proportioned in terms of their slenderness.***

As evidenced in section 1, Lambeth officers do not consider that the proposal achieves design excellence and harm to street and long range views is evidenced. The height of the 20 storey tower is only approximately 3 times its width.

The February 2020 draft Lambeth Design Code SPD Part 3 states that:

*3.4 Designers should guard against over development by ensuring the development capacity of the site is optimised and not exceeded. Over development, especially at high density, leads to poor outcomes not just on site but for the wider community. This can include insufficient amenity spaces, poor daylight sunlight or excessive pressure on public realm and infrastructure. **Designers need to be able to show how they have achieved optimum density. The first step is ensuring all established planning policy and other development standards are met.***

*3.10 With the need for continued growth in Lambeth and in recognition that London's character is ever-evolving much of the new development coming forward is going to be taller than its current context. In some instances development may be substantially taller.*

*Designers should:*

- 1. Consider **stepping massing down in sensitive locations** where it would be desirable to respond positively to established context; especially **heritage assets and conservation areas.***
- 2. Ensure the built forms work in **immediate and longer views.***
- 3. Use locally distinct materials and careful proportions to aid visual integration with local context.*

*3.28 ....Given that tall buildings are by their definition 'substantially taller' than their context their impact is undoubtedly going to be greater.*

*Designers should:*

- 2. Guard against outcomes that **loom uncomfortably over existing low-rise neighbours**  
[...]*

**5. Seek elegant and well-proportioned architectural outcomes** which unify the top, middle and base into a coherent whole.

**6. Mitigate against potential adverse impacts** – wind, micro-climate, daylight and sunlight etc. through design excellence.

The building is in a sensitive location being immediately adjacent to the Brixton Conservation, but yet the highest part of the building is located at that boundary. Neither does the building mitigate against adverse impacts. The building would indeed loom over its existing low-rise neighbours and cast long and large shadows over the town centre

The Brixton SPD is under review but in relation to tall buildings the adopted Brixton SPD 2013 states at para 4.1.2 that (emphasis added):

*Tall building development on suitable sites, to a height of 10 storeys, is likely to have a neutral impact on Brixton's heritage assets (and their settings). Development between 10 and 15 storeys will be visible from within the conservation area and has the potential to have an adverse impact. **Development in excess of 15 storeys is likely to have a significant adverse impact. Large, bulky, squat or alien looking structures are unlikely to be considered acceptable. In order to mitigate such harm, new tall buildings should be slender, of elegant proportions and with a good silhouette.***

The design of the building is neither slender nor elegant. Both blocks are crude extrusions from its footprint which results in an equally crude silhouette..

The above demonstrates that the design fails to meet national, regional and local design codes and policies let alone achieve the level of excellence required by Lambeth policy Q26 and the exemplary standard required by London Plan policy D9.

## SUMMARY

When Sir David Adjaye, signed Skyline campaign's statement on 29 March 2014, he agreed that implementation of [tall building] policy is 'fragmented and weak' and this had resulted in buildings which are 'hugely prominent and grossly insensitive to their immediate context and appearance on the skyline'. This quote describes the building designed for Hondo Enterprises in the centre of Brixton on a site which Lambeth Council consider not to be appropriate for tall buildings.

If this application were to be approved it would set a damaging precedent for further tall buildings in the area and across London.

Quite clearly the application in front of the Mayor flies in the face of London and Lambeth tall building policy. It is precisely the sort of development that these policies are designed to prevent and I would urge to the Mayor to refuse this application.

[REDACTED]

27th Oct 2021

[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 27 May 2022 14:59  
**To:** Popes Road  
**Subject:** GLA reference: 2021/0265 20-24 Pope's Road, London Borough of Lambeth

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear GLA,

I sent in a brief OBJECTION on 20th May 2022 but I appear not to have received any acknowledgement that it has been received. If It is not possible to make a spoken representation on the day of the hearing via Zoom then I wish to apply to attend in person and speak at the hearing. The full representation I would like to make at the hearing is as follows and would take about two minutes to deliver. I also support many other reasons being put forward by others for opposing this development, which I do not wish to duplicate in my representation.

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The Brixton Recreation Centre (the Rec) lies approximately to the south of this proposed development and has a very high annual energy consumption. In the year 2011/2012 its energy consumption was as follows:

GAS  
4,475,021.50 kWh  
ELECTRICITY  
1,393,182.90 kWh  
Source: Freedom of Information request to London Borough of Lambeth

With the recent and expected future rises in the cost of energy the continued viability of the Brixton Recreation Centre as a vital community asset could be thrown into doubt if something is not done to reduce its energy bills.

The swimming pool's heating must make up a significant proportion of its consumption and this could be significantly supplemented from spring to autumn by solar thermal panels sited out of sight of ground level on the the building's roof.

If this proposed Pope's Road development were to go ahead any solar energy scheme, whether solar thermal or solar PV, would no longer be possible as the Recreation Centre would be shrouded by its shadow for much of the day.

In granting the recreation centre Grade II listing status, Historic England included the following statement about the importance of this building to the community:

"Architect: one of George Finch's most important buildings and illustrating his socialist principles: his extensive research enabled him to provide well-designed individual activity areas within a very cleverly-planned whole, maximising the space to include the greatest number of facilities for the public, and encouraging interaction between users; \* Cultural importance: since opening, the recreation centre has become a social centre for the community, much-valued in the locality and the site chosen by Nelson Mandela as part of his historic state visit in 1996 in the area most synonymous with post-war black British culture."

<https://historicengland.org.uk/listing/the-list/list-entry/1436440?section=official-list-entry>

-----

[REDACTED]

---

**From:**

[REDACTED]  
20 May 2022 22:19

**To:**

Popes Road

**Subject:**

GLA reference: 2021/0265

**Follow Up Flag:**

Follow up

**Flag Status:**

Flagged

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I wish to object to this planned development and am applying in principle to speak online against this proposed development, but I am happy for someone else to speak on my behalf as I just wish to add one point because it may be overlooked by other objectors:

"The Brixton Recreation Centre (the Rec), approximately to the south of the proposed development, is a large consumer of energy. It has a large roof where solar panels could be sited out of view of the ground, helping reduce the swimming pool's fuel bills. This development would throw the Rec into shade for much of the day."

Regards,



[REDACTED]

---

**From:**

[REDACTED]  
27 May 2022 17:07

**To:**

Popes Road

**Subject:**

Intention to attend to present oral comments as objector

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Your notice by email 10<sup>th</sup> June 2022:

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

20-24 Pope's Road, London Borough of Lambeth

GLA reference: 2021/0265

Southwark Council reference: 20/01347/FUL

[I believe that's Lambeth Council ref 20/01347/FUL].

I want to resent oral critical comments about:

public transport connectivity;

related AQ and related other transport issues;

This is in line with previous submissions to LBL PAC 2 meeting Nov 2020.

My submissions to GLA following the reconsideration of the Mayor's sect 2 response to LBL, and the decision to call in the application under sect 3.

Detailed submission to follow shortly, so as to be effectively considered by GLA in preparation of inquiry arrangement, 10<sup>th</sup> June 2022.

kind regards

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 25 May 2022 00:31  
**To:** Popes Road  
**Subject:** My objections.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

I feel I must speak up to utter, in person on 10th June, at the London City Hall, my objections to the plan for Popes Road development:-

- 1) From what I have seen of computer generated images of the Hondo Tower, I strongly feel it would simply be a hideous, inappropriately sited eyesore, from every viewpoint in the area.
- 2) At a time when it is crucial, for both cost and Climate Change reasons, to curb both electricity and gas consumption, research has shown that 20 storey , highly glazed, towers are known to consume , certainly in the case of the former, twice as much per square metre as low rise buildings. Gas consumption is similarly affected.
- 3) Changes to planning legislation means that the proposed office space could be converted to living space without new planning application. As, at present, there are plenty of work spaces and training opportunities in the area, the likelihood of much of the office space in the proposed new development remaining empty does not give any confidence that that would not be taken advantage of to the detriment of the residents themselves, or Brixton.
- 4) Angelo Gordon and Texas, I imagine, will not be moving here, so would not, on a daily basis, be affronted by this ghastly edifice. Members of Lambeth Council, presumably resident in the area might be happy to be thus confronted, but to them I would suggest they move to Vauxhall or Croydon forthwith, a proliferation of unlovely, windy towers are already there.

Yours sincerely,

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 15:43  
**To:** Popes Road  
**Subject:** Pope's Road Representation Hearing, June 10th, 2022

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear GLA officers,

I would like to inform you of my intention to participate in the Pope's Road hearing on June 10, 2022, online. I would also like to request to speak as an objector.

My concern as an [REDACTED] and long-term Lambeth resident is the impact of the planned development on Brixton's heritage both tangible and intangible.

- Assessment of heritage benefits currently provided in the Pope's Road built environment with particular attention to the area's outstanding relevance for Britain's convivial metropolitan culture.
- Assessment of the intangible heritage currently perpetuated by specific community groups.
- Cultural risk assessment of the planned development in Pope's Road.

I do not wish to speak as a formal representative of any group but offer my independent professional position [REDACTED]  
[REDACTED]  
[REDACTED]

I am happy for the GLA to pass on my personal information to other registered speakers. Please let me know who to liaise with.

Sincerely

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 23:56  
**To:** Popes Road  
**Subject:** Re: 20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear GLA officers,

Please note correction of two minor typos marked with \* (see underneath main text) Thank you

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 22:51  
**To:** popesroad@london.gov.uk <popesroad@london.gov.uk>  
**Subject:** 20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection

## **20-24 Pope's Road-Hearing 10th June -Request to Speak-Objection**

Dear GLA Officers,

Following my previous email today, I wish to submit a request to speak at the Hearing on 10<sup>th</sup> June. I will be objecting to Hondo Enterprises' application for 20-24 Pope's Road, also known as the 'Hondo Tower.'

I will be speaking on behalf of the 'Fight the Tower' campaign, and as a lifelong Lambeth resident.

I submitted my written representations in collaboration with [REDACTED], another member of the FTT campaign.

I'd like to speak in person, and I'm happy to share my personal details.

I would like to cover points set out in these two submissions made previously, as follows. (Please see attached)

### **1.Local Consultation and Public Opinion** (written representation -dated 4<sup>th</sup> Nov 2021)

Main points.

- The Hondo Tower' application is deeply unpopular locally, across a diverse spectrum of the population.
- 
- Many people remain unaware if the proposed tower and the Fight the Tower campaign have been working to inform local communities and hear their views on it. This includes people who are marginalised and digitally excluded.\*
- 
- The vast majority of responses to the **statutory consultation** opposed the planning application. These objections raised concerns about the harm to the cultural and historical heritage of Brixton that the development would cause.
- 
- Hondo's own 'consultation' exercise was poorly advertised, received a low number of responses and failed to reach large sections of the community, including key local community and residents' groups.
- 
- We have argued that the information presented by Hondo about the proposed development was misleading at best. There is also no doubt that the survey questions they asked participants were 'loaded' (ie not unbiased.) Despite this the results showed that the vast majority of people who attended or responded online were against the plans.
- 
- This included concerns about the size of the building, questioning the need for commercial office space, as well as residents raising the issues of ongoing gentrification, the likely effect on rising rents and so on.
- 
- However, the consultants Lowick, and others connected with the application, have attempted to present these results as showing support for the application, when they show the opposite.
- 
- Meanwhile serious questions have been raised regarding the legitimacy of many of the comments and letters written in support of the Tower.
- 
- Questions were asked by at least one Lambeth PAC committee member, at PAC 1, as well as by Dulwich and West Norwood MP, Helen Hayes, at PAC 2, about whether sudden increases in support for the application, within very limited time periods, might have been artificially created.
- 
- 
- Furthermore, the applicant's chosen partners for the community floorspace consultation- i.e. the 'Brixton Project' also ultimately came out and made a public statement criticising the scheme.

### **Local Opposition**

- A concerted grassroots community campaign has gathered overwhelming evidence of local opposition to the tower. At the time these two written representations were submitted, a petition addressed to Lambeth council had reached 8,468 signatures, while a second petition, addressed to the London Mayor, stood at 4,956 objections.
- As Fight the Tower campaigners, we collected nearly 2000 hand-written objections written by members of the local community in the form of postcards.

## **2.Response to the Revised Planning Application ( written representation- dated 13th Dec 2021)**

## **Main points.**

**Affordable workspace:** Hondo's 12.5% so-called affordable workspace in the tower would be charged at 50% of their full market rent. As this will be a high spec, high-cost building, it would still not be affordable to small businesses in Brixton.

The revised application offer does not increase the affordable workspace or reduce rental costs; it merely extended the length of time that it would be available. Modern office blocks tend to have a life span of 30 to 40 years. Hondo's offer was trivial, as the building would most likely not even last until 2090.

## **Community Space**

Meanwhile, 1% of the floor-space allocated for community use remained unchanged- in other words 221sqm- the size of approximately a three-bed apartment.

## **Employment**

Hondo's enhanced offers on employment, entry level jobs and apprenticeships are not within their gift .What's more, they were extremely limited, very thinly spread, and came about because they predicted that only 14% of positions in the development will go to Lambeth residents, let alone Brixton residents- lower than the 25% stipulated by Lambeth.

There were no real guarantees given by Hondo regarding employment either. For example, on apprenticeships, Hondo could only offer 'reasonable endeavours' to make sure that these would be provided.

The 'offer', as revised, will not result in any meaningful benefits to Brixton, and even if the 'offer' were improved, it would not offset the harm caused to Brixton's local economy, its small businesses and its heritage. Nor did the revised application diminish the risk that the tower could be converted into unaffordable private housing via Permitted Development Rights (PDR) if demand for this huge office space did not materialise.

Sincerely,



\*Many people remain unaware of the proposed tower but the Fight the Tower campaign have been working to inform local communities and hear their views on it. This includes people who are marginalised and digitally excluded.

[REDACTED]

---

**From:** [REDACTED]

30 May 2022 09:36

**To:** [REDACTED]

Popes Road

**Subject:**

Re: Intention to attend to present oral comments as objector

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

[REDACTED] will send  
my comments by eob today.

I have put in important comments at prior stages-to LBL PAC 2 in Nov 2020, and written comments into GLA in Nov and Dec 2021. PAC 2 allowed only 3 objectors at 2 minutes each, with MP Helen Hayes and two local councillors accorded similar inputs [all to object] so that was a serious anti -democratic impediment to pursuing critical engagement with a significantly extravagant project proposal.

My transport comments specifically embrace inter alia London Overground connectivity; my AQ comments will show that the project's AQA was inadequate on four important grounds which make it invalid.

[REDACTED]

---

**From:** [REDACTED]

**Sent:** 27 May 2022 16:06

**To:** popesroad@london.gov.uk <popesroad@london.gov.uk>

**Subject:** Intention to attend to present oral comments as objector

Your notice by email 10<sup>th</sup> June 2022:

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.

20-24 Pope's Road, London Borough of Lambeth

GLA reference: 2021/0265

Southwark Council reference: 20/01347/FUL

[I believe that's Lambeth Council ref 20/01347/FUL].

I want to resent oral critical comments about:

public transport connectivity;

related AQ and related other transport issues;

This is in line with previous submissions to LBL PAC 2 meeting Nov 2020.

My submissions to GLA following the reconsideration of the Mayor's sect 2 response to LBL, and the decision to call in the application under sect 3.



Detailed submission to follow shortly, so as to be effectively considered by GLA in preparation of inquiry arrangement, 10<sup>th</sup> June 2022.

kind regards

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

27 May 2022 15:29

**To:**

Popes Road

**Subject:**

RE: Notice of Representation Hearing: 10 June 2022

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear John Finlayson,

Thank you for the notice of representation hearing. I intend to participate in the hearing online and would like to request to speak as an objector.

My concern as an [REDACTED] and long-term Lambeth resident is the impact of the planned development on Brixton's heritage both tangible and intangible.

I do not wish to speak as a formal representative of any group but offer my independent professional position [REDACTED] based on qualitative research and participant observation in relevant community groups, as well as my experience as a long-term resident.

I am happy for the GLA to pass on my personal information to other registered speakers. Please let me know who to liaise with.

Sincerely

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 May 2022 12:39  
**To:** John Finlayson; Popes Road  
**Subject:** Re: Pope's Road Notice of Representation Hearing: 10 June 2022  
**Attachments:** WCDG Hondo STATEMENT for GLA hearing 300522.pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear John

Further to my note on Friday, please find our full Statement for the oral hearing attached.

Clearly, we will only be able to speak to a precise of this Statement

All the best

[REDACTED]  
**Waterloo Community Development Group**

[REDACTED]  
[www.wcdg.org.uk](http://www.wcdg.org.uk)

*Waterloo Community Development Group is a Company Limited by Guarantee 4269850 and a registered charity 1114299*

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**From:** [REDACTED]  
**Sent:** 27 May 2022 17:51  
**To:** John Finlayson [REDACTED]; popesroad@london.gov.uk <popesroad@london.gov.uk>  
**Subject:** Re: Pope's Road Notice of Representation Hearing: 10 June 2022

Dear John

We wish to take the opportunity to make oral representations in person at the public hearing of 10 June in objection to this application, solely on the impact of the development on residential amenity re daylight, as per our objection.

Unfortunately we did not receive notice of this opportunity and were only informed of the deadline this morning, so have been unable to complete our statement for today's deadline - but it will be with you later tonight or tomorrow morning (I'm determined to finish it this evening!) - I hope that is okay.

All the best

[REDACTED]  
**Waterloo Community Development Group**

[REDACTED]  
[www.wcdg.org.uk](http://www.wcdg.org.uk)

# Waterloo Community Development Group

A Company Limited by Guarantee, registered in England & Wales  
Registration No. 4269850  
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Registered Office: 14a Baylis Rd, London SE1 7AA  
Tel: 020 7633 9291  
Website: [www.wcdg.org.uk](http://www.wcdg.org.uk)  
Email: [REDACTED]



30th May 2022

Dear Mr Finlayson,

**RE: 20-24 Pope's Road, London Borough of Lambeth (GLA reference: 2021/0265)**

Further to the note I sent on Friday, we wish to take the opportunity to make oral representations in person at the public hearing of 10 June in objection to this application, solely on the impact of the development on residential amenity re daylight, as per our objection.

Please find our statement below. We apologise for its lateness, but, as explained in the note of 27/05/22, we did not receive notice of this opportunity and were only informed of the that day.

## STATEMENT

There are many offensive aspects to this application, which is entirely out of context in Brixton. How is WCDG – a community-led charity concerned with development in Waterloo – affected by this application is for a site in Brixton? We are increasingly concerned by the on-going onslaught on daylight and sunlight of residents through badly designed schemes which do affect Waterloo: and we have been involved in several public inquiries where purported daylight experts seek to undermine the BRE guidelines protecting residential daylight by citing cases from elsewhere in Lambeth and London, where they claim that their specious arguments have found traction.

This is a high profile case and any decision will have repercussions in future decisions elsewhere, particularly with regards claims of acceptability when it comes to reductions in residential daylight.

We therefore lodged an objection to this application with Lambeth on that basis in October 2020. We were at that point about to exchange Proofs for the public inquiry regarding 8 Albert Embankment, following recovery by the Sec of State. One of the key issues in that case was the impact on residential amenity viz daylight. During the course of the inquiry a number of flawed arguments often proffered by daylight experts were exposed as baseless. The same baseless arguments have been reiterated in the Pope's Rd case, despite the fact that the Inspector in 8 Albert Embankment went on to find against these arguments in his Report, a finding which was supported by the Secretary of State, with the impact on residential daylight and sunlight being one of the two issues for which the scheme was ultimately refused.

### 1. Information missing from the application

Unfortunately, the Pope's Rd application contains an even more problematic flaw: the evidence has not been provided which is necessary to enable the decision maker to come to a judgement about the acceptability or otherwise regarding the impact on residential daylight. In order to make a judgement about the acceptability of the impact, detail is required of exactly how many windows, rooms and homes are affected. A full read out of all of the windows is normally provided in an Appendix, numbering each window and predicting the

existing VSC and expected impact on VSC of the proposal, providing a calculation of the proportion lost and the retained value. However, the applicant has failed to provide:

- the detailed analysis of the windows negatively affected – i.e. both the proportion lost and the retained VSC of every window potentially affected – from which the summary is drawn
- window maps to identify the location of the windows analysed
- details of the number of homes affected in each block

A commentary is provided by GIA in the D&S for the applicant, but without any of the evidence it is impossible to properly assess this commentary. The commentary contains “summarised results”, but these are completely useless for decision-making, since it is not possible to understand the quality and quantity of the losses. It is of little comfort if, in a block of 100 flats, 200 of the 250 windows meet BRE guidelines, if the remaining 50 windows have losses 3 or 4 times greater than considered acceptable in BRE guidelines (i.e. 60%-80% loss), or would have such a low retained daylight that electric lighting would be required throughout the day, for example.

It is to be noted that the figures provided in the summary tables for each block are anyway illegible in the D&S report provided on line, although that is of little consequence given their meaninglessness without the complete figures. From the evidence provided it is not even possible to determine how many dwellings are affected, or their tenure – a matter of some import given the Secretary of State’s decision re 8 Albert Embankment (see below).

Bizarrely, the only detail (but still without window maps to verify) is provided in Appendix 4 regarding “BRE Compliant Properties”. Most of these properties are a considerable way from the application site, such as the Barrier block (‘Southwyck House’), Valentia Place, or Chilham Court – although even at this distance a couple of the windows fail as a result of the development, leaving less than 15% VSC. It is precisely this level of detail of analysis which needs to be provided for all of the properties affected: yet it is precisely the windows and homes where this failure is likely to be significant and widespread – such as at the 155 homes at 368-372 Coldharbour Lane – which is not provided. This is more than just odd, it is deeply suspicious, and renders a safe decision by the Mayor all but impossible.

## **2. Planning policy**

At section 3 of the D&S the applicant correctly identifies the policy position regarding the London Plan and Lambeth Plan (albeit referring to the London Plan Intend to Publish and Lambeth Plan 2015). Policy Q2 Amenity of the Lambeth Plan 2021 states that development will be supported if it would not have an unacceptable impact on levels of daylight and sunlight on neighbouring property, and comments:

*“Most new development in Lambeth results in an intensification of uses. It is therefore essential that amenity considerations are at the fore when designing at higher residential densities for a growing population... The council will use established industry standards when assessing schemes, including ‘Site Layout Planning for Daylight and Sunlight’ (BRE Trust, 2011) having regard to context and other material considerations” (10.2, 10.5)*

## **3. BRE guidance and GIA methodology**

The purpose of the BRE guidance is to advise “on site layout planning to achieve good daylighting and sunlighting, within buildings and in the open spaces between them” (1.3). There is much evidence that poor

daylight in buildings can have an impact on mental health and general health; good daylight reduces the need for artificial electric light, critical in this climate emergency.

The guidelines are clear that *“the quantity and quality of daylight inside a room will be impaired if obstructing buildings are large in relation to their distance away... the taller and nearer the obstruction, the less light is received”* (2.1.1, 2.1.3). This statement of fact applies to all windows everywhere, whether in the centre of a city or in a suburban or completely rural area.

The BRE guidance establishes various measures for providing at least adequate daylight:

*“If VSC is at least 27% conventional window design will usually give reasonable results [but] between 15% and 27% special measures (larger windows, changes to room layout) are usually need to provide adequate daylight [and] between 5% and 15% it is very difficult to provide adequate daylight”* (Summary 2.1.21).

Again, this is a statement of fact applicable to *all* windows, *everywhere*, urban, suburban, or rural. Unfortunately, the applicant’s GIA daylight report prefers to deal in urban myths:

- a) Firstly, it is completely false to claim that “the target values set out in the BRE guidelines are based upon a suburban context” (4.8). Furthermore, GIA must be perfectly aware of this, since the author (Dr Paul Littlefair) of the BRE guidance has made this clear on numerous occasions (including at the 8 Albert Embankment public inquiry 2021); and the High Court judge in the Rainbird case of 2018 concluded

*“There is in fact nothing in the BRE Guide that states that this value in the VSC guideline is derived from a suburban development or that indicates that its guidelines are only applicable to developments outside an ‘inner city urban environment’, much less only to those in non-urban locations.”* ([Rainbird, R \(on the application of\) v The Council of the London Borough of Tower Hamlets \[2018\] EWHC 657 \(Admin\) \(28 March 2018\) \(bailii.org\)](#) (112)

- b) Secondly, the applicant’s GIA daylight report elides from this first untruth to a second unsubstantiated claim:

*“it is an inevitable consequence of the built up urban environment that daylight and sunlight will be more limited in dense urban areas”* (4.6)

This claim is completely disproven by the adequate daylight currently achieved in properties in the area, provided in the GIA’s own evidence:

- The Canterbury Arms currently enjoys excellent daylight, with all 24 windows at or above 35% VSC (the maximum achievable is around 40%)
- 2-7 Valencia Place also enjoys excellent daylight, with 48 out of 54 windows achieving above 32%, many in the high thirties, and only one falling marginally below the 27% threshold (26.1)
- Northgate Court: 80 out of 104 windows enjoys above the BRE guidelines 27%, many in the mid-30s; 24 of the windows achieve less than 27%, but all but one achieves above 23%
- Southwyck House (Barrier Block): despite small north-facing windows, currently enjoys above 27% on 18 out of 21 windows, with only 3 marginally below at around 25%
- Chilham Court: 30 out of 44 enjoys above 27%, some in the mid-30’s, but with 5 windows below 22%
- 378 Coldharbour Lane: enjoys above 27% VSC in 7 out of 9 windows, and the two that fail are above 24%
- Atlantic Road properties: enjoys above 27% VSC in 17 out of 26 windows, and 22 out of 26 achieve above 22% VSC

- 360-386 Coldharbour Lane does not fare so well, with on one side 14 windows currently range between 17% - 21% VSC, although on the other side only 6 of the 25 windows fall below 25% VSC

In total, out of 217 existing windows analysed in this town centre:

- 168 (77%) enjoy above the BRE guidelines for adequate daylight of 27%
- A third (67 windows) enjoy excellent daylight around the mid-30's or above
- 49 windows are below the BRE guidance but
  - 189 windows in total (87%) enjoy above 23% VSC
  - 28 windows (13%) are below 23% VSC, but only 4 windows (1.8%) are below 20% VSC.

This is the context of 'urban' Brixton.

It is very clear from this evidence alone – the only detailed evidence presented by the applicant – that it is far from *“an inevitable consequence of the built up urban environment that daylight and sunlight will be more limited in dense urban areas”*. GIA has an absolute mountain of such evidence from its many cases across London, where it supports significant losses in daylight resulting from similarly oppressive development proposals. It is unbecoming of its professional duty to continue to trundle the false claim of an *“inevitable consequence”* that daylight must be more limited in dense urban areas.

The issue is in fact one of design. As these examples illustrate, and as London Plan and Lambeth Plan policy and guidance requires, good design enables good quality of light to be achieved in dense urban areas.

- c) Thirdly, this fact – that the daylight enjoyed by residents in the urban environment of Brixton is generally at or above the BRE guidelines – undermines the attempt to apply **“alternative target values”**.

The BRE guidance allows for the flexibility to set different target values in specific locations where there are special circumstances to justify doing so. It provides two examples of such special circumstances: *“in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.”* (1.6) Appendix F provides a further example where *“an existing building has windows that are unusually close to the site boundary”*.

It is important to note that the BRE guidance is not suggesting that lower target values could provide adequate daylighting; it has made clear that adequate daylight is generally provided by a VSC of 27%, not less. The guidance is proposing that in special circumstances where *inadequate* daylighting is already the case – such as a mews in a historic centre, or amongst a cluster of tall buildings – then a lower target would be a reasonable approach, and lower rates could be acceptable.

What are the special circumstances in this case to adopt different target values? As the High Court has made clear in the Rainbird case, if any target values or guidelines are to be adopted which differ from those in the BRE guidance, then the reasons why they should be adopted should be made clear. [113]

The application site is not located in a historic city centre, or in an area with modern high rise buildings, or where there are existing windows unusually close to the site boundary. No such special circumstances are provided by GIA. Merely being in an urban area is not enough. Lambeth is an inner-city borough, and much of it is urban, yet the Lambeth Plan does not propose that the impact of developments in Lambeth should be assessed generally by reference to any target values or guidelines other than those given the BRE guidance.



- d) Fourthly, GIA insinuate that “many recently consented schemes within London” have accepted lower retained daylight levels, but only cites two: Buckle Street and Graphite Square. Regarding the relevance of the Graphite Square decision, the Inspector at 8 Albert Embankment reported:

*“In the Graphite Square Appeals (CD L2) the Inspector also commented that any reduction in daylight and sunlight entering the flats in the appeal scheme as a result of either of the schemes must be seen in context. However that applied to the particular circumstances he was faced with in the appeal, where he found that the affected property was in a rather privileged position, because of the minimal massing on the area of the appeal site it borders, which meant it received much higher levels of daylight and sunlight than might be expected in such an urban location.” (754)*

The Inspector for 8 Albert Embankment went on to conclude

*“In my view, there is a danger in placing too much reliance on such comparisons. Although it is close to the heart of London, some of the affected accommodation around the appeal site houses families with vulnerabilities, who have little choice about where they live. Evidence that links daylight levels with human health, including mental health and disease resistance was referred to by Lambeth Village, and is more than anecdotal. Material reductions in daylight should not be set aside lightly.” (757)*

- e) Fifthly, the alternative target values proposed are palpably absurd. As GIA’s own detailed evidence demonstrates, a third of windows in the area currently enjoy excellent daylight well above 30% VSC; 77% of windows enjoy adequate daylight of 27% VSC or more, 87% receive at least 23% VSC, and only 1.8% receive less than 20% VSC. None are below 18%. Yet GIA proposes an alternative target value of 15% VSC, a level of gloom not achieved anywhere in the detailed figures they have provided. If GIA’s alternative were adopted, then ¾ of the windows could lose nearly half of their existing daylight (45%), but this would be deemed acceptable!

This is fundamentally contrary to policy requiring development not to have an unacceptable impact on levels of daylight of existing property, as determined by established industry standards, explicitly the BRE guidance.

#### **4. Conclusion**

This is a site surrounded by railway lines, which has one obvious benefit, namely that neighbours who may be impacted are not directly adjacent, since separated by a railway viaduct. Nevertheless it is a measure of how this application is over-sized and out of context that hundreds of surroundings residential properties will be significantly negatively impacted in terms of daylight, despite the additional separation of the railway viaducts.

The surrounding context of Brixton town centre is generally commercial buildings of 3-5 storeys, with slightly taller residential buildings to the east of 3-7 storeys. The contextual heights of Brixton’s commercial centre are not provided in the applicant’s D&A Report, but the heights of the taller residential buildings are given in the D&S (GIA): the directly adjacent residential height averages 30m. Ranging from 48.9m to 95.7m, the application at its highest is over three times the contextual height of existing residential.

Clearly such an aggressive increase in height is likely to have some impact on the daylight enjoyed by neighbours, but it is impossible to properly assess the acceptability or otherwise of the impact of the proposed development on the daylight enjoyed at existing residential properties, because the detailed analysis has not been provided by the applicant. But just to take one property clearly affected negatively: of the 155 flats at 368-372 Coldharbour Lane, we can extrapolate from the summary (GIA 5.17 - 27) that

- 73 windows (35.5%) fail the BRE guidance (but we are not told how, or by how much)
- 34 windows would range between 15% and 27% VSC
- 39 windows would receive less than 15% VSC (again, we are not told by how much, and what percentage of loss from existing this would entail).

This is a block of 155 homes, including 48 affordable homes. Which homes are affected? How many of the homes affected are affordable? The Secretary of State and Inspector were concerned about the impact on “families with vulnerabilities, who have little choice about where they live”. The applicant has shown no signs of being similarly concerned.

The Mayor of London should be so concerned. The evidence provided does not allow for a full assessment of the impact on daylight and residential amenity, and a safe granting of permission is simply not available.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 17:52  
**To:** John Finlayson; Popes Road  
**Subject:** Re: Pope's Road Notice of Representation Hearing: 10 June 2022

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear John

We wish to take the opportunity to make oral representations in person at the public hearing of 10 June in objection to this application, solely on the impact of the development on residential amenity re daylight, as per our objection.

Unfortunately we did not receive notice of this opportunity and were only informed of the deadline this morning, so have been unable to complete our statement for today's deadline - but it will be with you later tonight or tomorrow morning (I'm determined to finish it this evening!) - I hope that is okay.

All the best

[REDACTED]  
**Waterloo Community Development Group**

[REDACTED]  
[www.wcdg.org.uk](http://www.wcdg.org.uk)

*Waterloo Community Development Group is a Company Limited by Guarantee 4269850 and a registered charity 1114299*

[REDACTED]

**From:**

[REDACTED]  
27 May 2022 18:34

**To:**

Popes Road

**Subject:**

Re: Request to speak at Pope's Road Hearing - objector

**Attachments:**

DetailedStatement\_SFT.pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

P.S. Just to clarify, I am happy for my personal details to be shared. Thank you!

Sent from my iPhone

On 27 May 2022, at 16:40, [REDACTED]@gmail.com> wrote:

Dear Mr Finlayson,

Thank you for notifying me of the upcoming hearing to determine application 20/01347/FUL for 20-24 Pope's Road (GLA ref: 2021/0265).

My name is [REDACTED], and I request the opportunity to **speak at the hearing in person as [REDACTED] and object to the proposed development.** Please find my detailed statement attached with this email.

I submitted a written representation on 3rd February 2022 to object to the applicant's enhanced offer (November 2021) and its additional documents (January 2022) The representation objected to the proposal on the basis of its impact to the amenities of the neighbouring residential and non-residential properties. My attached detailed statement also focuses on these issues.

I look forward to hearing from you again with further instructions.

Kind regards,

[REDACTED]

27<sup>th</sup> May 2022

[popesroad@london.gov.uk](mailto:popesroad@london.gov.uk)

Dear Mr Finlayson,

**RE: 20-24 Pope's Road, London Borough of Lambeth (GLA reference: 2021/0265)**

Thank you for notifying me of the upcoming hearing to determine application 20/01347/FUL for 20-24 Pope's Road (GLA ref: 2021/0265). I request the opportunity to speak at the hearing in person as an **objector**, [REDACTED], one of the residential buildings that will be directly affected by the proposed development.

I object to the proposal because of its **unacceptable harm to the amenities (views, privacy, daylight/sunlight conditions, and noise)** of the neighbouring residential properties as well as Granville Arcade (Brixton Village) and the Brixton Recreation Centre, as indicated below:

1. **The proposed development does not comply with Policy Q2 Amenity i) and Policy Q22 of Lambeth Local Plan (2021).** Carney Place properties are located within the Loughborough Park Conservation Area. Policy Q22 ii) specifically states that development proposals affecting conservation areas will be permitted if they *"preserve or enhance the character or appearance of conservation areas by (...) protecting the setting (including views in and out of the area)"* However, the height of the proposed development means that 44 rooms/windows will be completely deprived from the views out of the conservation area. In other words, all the Carney Place neighbours that currently enjoy such views will be deprived from them. For this reason, visual amenity of Carney Place is unacceptably compromised, contrary to Policy Q2 Amenity i)
2. **The proposed development does not comply with Policy Q2 Amenity iii) of Lambeth Local Plan (2021) and 2016 Housing SPG 2.3.36.** Brixton Society highlighted that *"the proposed office blocks will be unduly close to the rear windows of The Viaduct and Carney Place, creating mutual privacy issues and undue enclosure, in defiance of Local Plan policies Q2 (ii) and (iii)"*. Nevertheless, Lambeth's officer

report considers that the scheme is “*designed to ensure no undue overlooking*”. However, the planning application does not include the relevant cross sections and drawings to demonstrate how this 20 to 9 storey building, at a distance of just 17m, mitigates the level of overlooking (or perceived overlooking) on Carney Place and Walton Lodge properties.

3. **The proposed development does not comply with Policy Q2 Amenity iv) of Lambeth Local Plan (2021)** The GIA technical report included in the planning application (20/01347/FUL) states that “*unacceptable harm is not caused to the surrounding residential properties and the daylight and sunlight impacts are commensurate for the surrounding urban context*” However, this assessment is based on a series of unjustified assumptions and inaccuracies in the analysis:

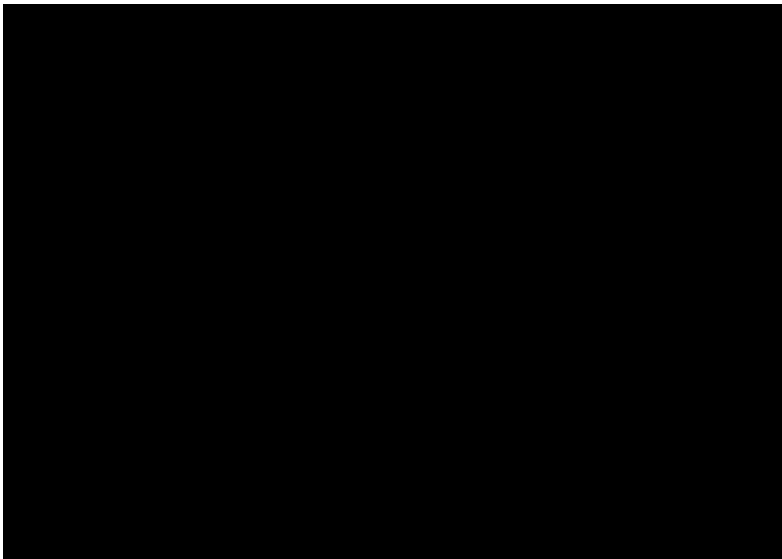
- a. The GIA report justifies the use of ATVs arguing that the values set in the BRE guidelines are for suburban environments. However, this interpretation is wrong and was challenged by Mr Joseph Thomas (barrister at Landmark Chambers) at the Lambeth’s Planning Application Committee (PAC) hearing in August 2020. Mr Thomas got written confirmation from the author of the BRE guidelines, Dr Paul Littlefair, that BRE values are not based on low density suburban housing models. Dr Littlefair also indicated that ATVs may be used if new developments are to match the height and proportion of existing ones (clearly not the case with the proposed development) He further explained that the examples of alternative ATVs included in the BRE guidelines relate to historic city centres and areas of modern high-rise buildings (also not applicable to this part of Brixton) In this sense, the use of ATVs in the GIA report is unjustified in relation to the BRE guidelines. The GIA report further tries to justify the use of ATVs based on their “*own professional experience; and the retained daylight levels attributed to many recently consented schemes within London*” However, the GIA report does not include the schemes it is referring to, which could be located in very different contexts to the one of this proposed development. Therefore, the adoption of these ATVs is not justified at all. This is extremely concerning since these ATVs represent a substantial deviation from BRE target values, which allows GIA to establish as ‘acceptable’ a much higher level of negative impact on daylight and sunlight conditions of neighbouring properties.

- b. The analysis of the sunlight/daylight overall impact on neighbouring properties is presented in percentage terms rather than absolute terms. This conceals the very high number of rooms/windows (i.e. 68) that have lower daylight values than the baseline ones established by GIA. The number of rooms/windows with values below the BRE values is even greater – i.e. 120. In addition, the numbers of affected rooms/windows are significantly higher than those in the Albert Embankment case (ref: APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106) where the severe impact on 24 windows/rooms was deemed by the SoS as unacceptable and led to the rejection of that proposal.
  - c. The GIA report and the Lambeth officer's report do not include a map indicating the position of the windows analysed. This means it was not possible for the PAC (or the general public) to verify whether the findings from such analyses corresponded to the worst affected properties in Walton Lodge and Coldharbour Lane.
  - d. The GIA and the officer's reports overall positive judgments on the impact of sunlight/daylight conditions of the proposed development on neighbouring properties are based on the idea that very low daylight values are acceptable for bedrooms. However, this ignores the fact that many of these bedrooms have been repurposed as working/playing spaces during the pandemic (as is my case, for example) and those uses could be expected to continue in the future as working patterns become more flexible. The unacceptable levels of gloominess of the proposed development on Walton Lodge and Carney Place properties will have an impact on our wellbeing and on our energy bills, as we will have to use electric lighting a lot more.
4. **The proposed development does not comply with Policy Q2 Amenity iv) of Lambeth Local Plan (2021)** The terrace use of the top floor of the proposed development will generate noise levels that, due to the very close proximity to the neighbouring residential properties (17m), will be very difficult to mitigate and reduce to an acceptable level.
5. Finally, the GIA report and the Lambeth officer's report have ignored the **impact of the proposed development on surrounding non-residential properties**, contrary to BRE guidelines that *"care should be taken to safeguard the access to sunlight both for*



*existing dwellings and for any nearby non-domestic buildings, where there is a particular requirement for sunlight.”* **Brixton Rec and Granville Arcade (Brixton Village)** are Grade 2 listed buildings immediately adjacent to the site and also public buildings. As a covered market enclosed by buildings on its flanking walls, Granville Arcade relies exclusively on its glazed roof to provide natural daylighting. The sports hall of Brixton Recreation Centre also relies on south facing overhead glazing to provide one of the very few sources of natural daylight. The occupants of these buildings (the general public) would clearly have a reasonable expectation of daylight, if not sunlight, when using them. However, there is no explanation for the omission of these non - residential buildings in the GIA report, which means that the impact on them has not been properly considered by the officer and the PAC.

For all these reasons, I believe the harm of the proposed development on privacy and daylight conditions is unjustified and unacceptable. Therefore, I am respectfully asking the Mayor of London to reject the proposed development and spare the residents of Carney Place and other neighbouring properties from its unacceptable harm to our future wellbeing. Thank you.



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 27 May 2022 09:41  
**To:** Popes Road  
**Subject:** Request to Speak - Pope's Road Hearing 10th June  
**Attachments:** 27.05.2022 Transport hearing statement of issues.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

I hope you are well.

I am emailing to request to speak as an objector at the hearing on 10th June for the Pope's Road development in Brixton. I wish to attend the hearing in-person at City Hall.

Attached is my statement of issues, outlining the subjects I would like to speak about (transport and air quality) and detailing the written representation I submitted in opposition to the application in October 2021 and February 2022.

Please let me know if you need any further information.

Best wishes,

[REDACTED]

## Statement of Issues – Transport and Air Quality

20-24 Pope's Road, London Borough of Lambeth

GLA Reference 2021/0265

Lambeth Council Reference: 20/01347/FUL

My name is [REDACTED], and I am objecting as a resident of Lambeth. I would like to speak in person and would be happy to share my personal details. My email address is [REDACTED]

Please find below my detailed statement of issues that I would like to speak to at the representation hearing at 10am on 10<sup>th</sup> June 2022. I submitted a written representation in objection to this development initially on 28<sup>th</sup> October 2021, and resubmitted this representation following the new consultation held on the development on Tuesday 1<sup>st</sup> February 2022.

This representation objected to the tower on the basis of transport issues. I would like to speak on public transport and air quality at the hearing, covering the subjects outlined below.

The development, according to a report commissioned by Hondo from Volterra Consulting, is projected to create an additional **1800 jobs** in the Brixton area, **83.75%** of these going to **non-residents** (as stated in the Officer's Report). This will lead to a considerable increase in the numbers of commuters.

### Public Transport

- Planning consultants Caneparo Associates prepared a transportation report for Hondo's development in March 2020 which was then revised in July 2020. The revised report projected an increase of 628 additional public transport trips in the peak morning period and 570 in the peak evening generated by office workers, based on trip rates for land use generated by TRICS and GEA figures provided by the applicant (in total, the trip generation figures account for an additional 777 trips in the morning and 705 in the evening, including walking). This accounts for **less than half** of the 1500 commuters expected to be entering the area for the newly created jobs mentioned above.
- Hondo's transport assessment (paragraph 7.6) states that "Sites have been selected from TRICS that are comparable in terms of location, accessibility, and parking provision" to provide insight into the development's projected transportation impact. However, TfL's website states that the TRICS database can be used if the sites are "similar to the proposed development in terms of location, scale, land use and car parking". Of the sites chosen to compare with this development only **one location is in Lambeth and two were from 2013**, and hence very out of date. This data is therefore not representative of the impact this development would have in Brixton

- The report goes on to state that, regarding the underground, train and buses it was considered that the impact (of the increased public transport journeys) would be either “negligible” or have no “material impact”. This assessment appears to sit in contradiction to the conclusion of Lambeth Council’s 2014 report that Brixton’s Victoria Line station is “**overcrowded**” and in need of relief.
- The GLA Stage 1 report at para 60, requested that the applicant provide trip generation figures for the market and community spaces but the revised report only provides public transport trip generation figures for the restaurant, not the other retail units or the community space even those these workers would be commuting as a direct result of the development. Therefore, 2,741 sqm GEA occupied **by retail and community use is unaccounted for** in the trip generation figures.

### Air Quality

This will focus on operational traffic emissions.

- The site is within an **Air Quality Focus Area** meaning there is **high air pollution and high human exposure** to that pollution. In June 2016 Lambeth Air Quality Action Plan reported that the application site experiences Nitrogen Oxide levels that far exceed the EU limit. The LEYF nursery is situated immediately adjacent to the site at the front of the Brixton Rec complex where there is an outdoor play area.
- Because the application site is within an AQFA, according to the London Plan the application should **incorporate design solutions** that **prevent or minimise increased exposure to existing air pollution** and make provisions to address local problems of air quality.
- The applicant lists these design measures as being a dust management scheme, a travel monitoring scheme and the provision of cycle parking. However, the first of these is a construction mitigation measure rather than design measure. The second is at best an operational mitigation measure. With respect to the third measure, the provision the long stay cycle provision of 322 spaces, barely meets the number required by London Plan policy T5 and the applicant's revised transport assessment acknowledges that the scheme fails to meet the London Plan policy T5 with respect to short stay cycle parking.
- Rather than incorporating design measures to improve air quality, the proposed development does the exact opposite. By creating new **street canyons** between the railway viaducts, and enclosing the Popes Road pedestrian area on 3 sides this would serve to **inhibit the dispersion of pollution** - contrary to EPUK/IAQM guidelines. The prevailing south west wind will bring pollution from Brixton Road via Electric Avenue to the pedestrian area in front of the proposed tower where people would increasingly congregate and where the nursery play area is situated.
- The applicant's Air Quality Assessment (AQA) states in the executive summary that “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.”

- The 6 local receptor locations chosen by the applicant's consultants in the AQA **fail to include important locations** that would be exposed to emissions (such as the nursery, adjacent flats their balconies and outdoor places plus the outdoor markets) and this selection does not comply with IAQM guidance 2017.
- The average annual daily traffic (AADT) figures provided by the applicant show that in total by 2024, the development would generate on average **565 additional vehicles** every day across the 6 closest road links considered .
- The TRICS data that was used for the **Air Quality Neutral** calculations **omits** to include trips generated by 2,741 sqm GEA of the development (retail and community use) and for the office and restaurant uses that were included in the figures, the trip rates were based on **unrepresentative assumptions**.
- Neither the AQA report or the transport report sets out how the annual car trip figures were derived from the trip rates provided by TRICS, which in the transport report are multi-modal. But it is clear from the transport report that the modal split for 2011 census data was adjusted for car trips - from 19.2% down to 0.4% although **no evidence base for this adjustment is provided**, contrary to Transport for London's transport assessment guide. This assumption is in stark contrast to the DoT's Transport Statistics of Great Britain report published in 2019 reporting that in 2018 27% of London commuters typically still travel to work by car.
- It is clear that the transport emissions calculation is highly sensitive to modal split and in the absence of vital omissions in the AQA calculations provided by the applicant, **Air Quality Neutral as asserted by the applicant, cannot be verified**.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 May 2022 14:56  
**To:** Popes Road  
**Subject:** REQUEST TO SPEAK AT POPE'S ROAD HEARING - OBJECTOR

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I wish to speak in person as an objector on behalf of the Brixton Society at the hearing on 10th June 2022.

[REDACTED]  
Chair, Brixton Society  
[REDACTED]

The Brixton Society is the Civic Society for the Brixton area of Lambeth.  
The Society has been in existence for more than 40 years and is a Registered Charity No.: 1058103

#### STATEMENT OF ISSUES

We wish to highlight two key issues from the many we have raised in our written representations:

- 1 It is common ground that the application does not conform to the Lambeth Local Plan. The Lambeth Planning Applications Committee granted permission on the basis that the benefits accruing from the proposed development would outweigh any harm caused by the departures from the Local Plan. We will demonstrate to the Mayor our contention that each of the benefits claimed by the Applicant is either:
  - illusory and unachievable; or
  - is such that the benefit could and should accrue from any substantial redevelopment of the site in conformity with the Local Plan and therefore provides no justification for any departures from the Local Plan, let alone ones which would cause harm on the scale that these would, as will be demonstrated to the Mayor in other representations.
- 2 The proposed 17 storeys of old-fashioned office space, intended to attract an “anchor” tenant, will prove a white elephant. The applicants can then seek to use permitted development rights to turn them into residential accommodation without any social or affordable housing contributions. The application looks prepared for this: the balcony treatment on the upper floors would not be a normal requirement for office floors but seems ideal for residential.  
The local demand is from smaller firms in the creative sector, as was recognised by the Mayor in approving the Brixton Community Enterprise Zone in 2018. This demand is best met by flexible office layouts, combined with common facilities, ideally grouped around an atrium; not what is proposed here.

[REDACTED]

---

**From:** [REDACTED]  
**To:** [REDACTED] 26 May 2022 17:07  
**Cc:** [REDACTED]  
**Subject:** Request to speak at Pope's Road Hearing - Objector  
**Attachments:** 20 24 Pope's Road objection Victorian Society.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Finlayson,

I would like to request the opportunity to speak at the upcoming hearing to determine the application for 20-24 Pope's Road. I wish to speak, in-person, as an **objector** on behalf of the Victorian Society, please find attached the Victorian Society's written representation.

I consent to my name and email address to be shared for the purpose of the hearing.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]





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**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

popesroad@london.gov.uk

Your reference: 2021/0265  
Our reference: n/a

26<sup>th</sup> May 2022

Dear Mr Finlayson,

**RE: 20-24 Pope's Road, London Borough of Lambeth**

Thank you for notifying the Victorian Society of the upcoming hearing to determine application 20/01347/FUL for 20-24 Pope's Road (GLA ref: 2021/0265). I request the opportunity to speak at the hearing in-person as an **objector**, on behalf of the Victorian Society.

The Victorian Society objects to the proposal because it would harm the significance of the Brixton Conservation Area, a designated heritage asset. The Brixton Conservation Area is formed of a Victorian town centre with Edwardian additions and is characterised by its low to medium rise buildings. Later development has respected this, and the Conservation Area's special character is still legible. This makes Brixton town centre increasingly unusual as it is not overshadowed or dominated by tall buildings like many town centres in Greater London. This is noted in the Conservation Area character appraisal - which advises against new tall buildings:

*'Should sites within or adjoining the conservation area become available, care should be taken to ensure that the new buildings are designed to respect the character or appearance of the area in accordance with UDP policies. Though there are several tall buildings adjacent to the conservation area new tall buildings are unlikely to be appropriate if they dominate or over shadow the conservation area.'*

The proposed development would dominate and overshadow the Conservation Area, causing harm to its character and setting, reducing the legibility of its historic character, and forming a dangerous precedent for future development.

The NPPF encourages authorities to *'look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance'* and that great weight should be given to preserving the significance of heritage assets. Where a proposal would cause harm it must be clearly and convincingly justified, showing that the public benefits of a proposal would outweigh harm caused.

**Patron**  
HRH The Duke of Gloucester KG, GCVO  
**President**  
Griff Rhys Jones  
**Chair**  
Professor Hilary Grainger

**Vice Presidents**  
Sir David Cannadine  
The Lord Howarth of Newport CBE  
Sir Simon Jenkins  
Fiona MacCarthy OBE

1 Priory Gardens, London W4 1TT  
Telephone 020 8994 1019  
admin@victoriansociety.org.uk  
victoriansociety.org.uk

The Victorian Society is unconvinced that the public benefits of the proposal would outweigh the harm caused. A 2020 study commissioned by Lambeth shows reduced demand for office space in Brixton and it is unlikely this will change with increased home working habits. Therefore, a development of the height and scale proposed cannot be justified against the harm it would cause to the heritage asset.

The Victorian Society understands that despite concerns raised regarding the height of the proposal by the Mayor, and a study to exploring the possibility of a lower building, no amendments to the proposal's height have been made. It is clear that the applicant will not consider a smaller scaled proposal which could reduce the harm to the Conservation Area.

We **object** to the proposal and urge the Mayor to reject this harmful and unjustified application.

Yours sincerely,



**Conservation Adviser**

[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 27 May 2022 13:40  
**To:** Popes Road  
**Subject:** Request to speak at Pope's Road Hearing - objector - [REDACTED]  
**Attachments:** RequestToSpeak\_Popes Road\_[REDACTED].pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom it May Concern,

Please see attached letter with a request to speak as an objection in the below meeting, I am a prior Consultee in this process.

Please let me know if you require anything further.

[REDACTED]



26<sup>th</sup> May 2022

**20-24 Pope's Road, London Borough of Lambeth**

**GLA reference: 2021/0265**

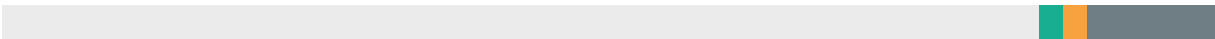
**Southwark Council reference: 20/01347/FUL**

To Whom It May Concern,

 and looking to speak as a resident  will be directly and severely impacted by this proposal.

I request to speak at the Pope's Road Hearing an Objector, in person at City Hall. My objections in summary are:

- Impact and harm to all general residents due to lack of sunlight and privacy
  - There will be a very real challenge to the health spike in Seasonal Affective Disorder for the res
- The severe impact to quality of life of residents in social housing in Milles Square/Carney Place
  - The social housing on the ground floors on the complex will literally live in darkness. There are children who play in the communal areas within the square with parents nearby, as it's safe to do so within the gated community, and their quality of life will diminish overnight
  - The proposal to build Carney Place/Milles Square is a relatively new building and will have only been approved under a condition what quality and affordable home was made available to people who would not be able to do so in the current market. Allowing this new development will destroy



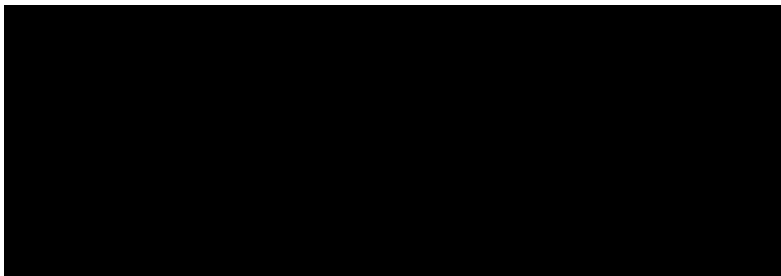
part of what allowed this development to take place, and a breach of the commitments by Lambeth Council to its people.

- Lack of requirement for office space within the area
  - In a post pandemic world, corporate office space is vastly empty across central London with low occupancy with the giant shift to remote/hybrid working revolution. Whilst we can't see in 20 years into the future, no pundit or expert believe the days of full workforces returning to the office is coming back.
  - The ROI for the costs to the community & inconvenience while property being built isn't matched by any genuine community or economic need
- Diminishment of Brixton being an important cultural destination
  - No respect for local character
  - Having vibrant outdoor and indoor markets is part of why people love Brixton, and come to spend money in Brixton, not a ubiquitous development that could be found in any other part of London

Selfishly, the quality of my life will be seriously eroded for the lengthy construction work, lack of privacy and diminished sunlight and I have concerns for increased severity of Seasonal Affective Disorder, however I am more concerned with the people of Brixton losing so much of the cultural value and joy and delight of living here. If that is something the Council is happy to do – you're short-selling us all in these negotiations short. £150,000 upfront promised funding should be more like £1,000,000 upfront. It's poor negotiating.

I look forward to sharing in person in more detail at the hearing.

Sincerely,



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 May 2022 18:30  
**To:** Popes Road  
**Subject:** [REDACTED] - Request to Speak at Pope's Road Hearing - OBJECTOR  
**Attachments:** [REDACTED] Request\_To\_Speak\_Popes\_Road\_OBJECTOR.pdf

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good evening,

Please find attached my formal request to speak, in person, as an objector on Environmental Grounds, about the Hondo Tower.

I look forward to hearing from you.

Kind regards,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## **REQUEST TO SPEAK AT POPE'S ROAD HEARING – OBJECTOR**

Dear Mr. Finlayson,

Thank you for notifying me of the upcoming hearing regarding the development at 20-24 Popes' Road. (GLA ref: 2021/0265)

**My name is [REDACTED]. Since buildings account for more than a third of the United Kingdom's carbon footprint; and knowing that the climate crisis disproportionately affects ethnic minorities like myself, I would like to speak about and scrutinise the Hondo Tower from an environmental standpoint. As the developer's architect and engineer are likely to present the scheme's sustainability approach, it is imperative that someone with a technical background is present at the hearing to challenge their claims.**

As it pertains to carbon and sustainability, the developer's breaches of the London Plan are the following:

### **London Plan Policy SI 2C – Questions as to the ability to meet the 35% operational energy reduction**

U-Values are a measure of heat loss through building fabric – walls, windows, floors. The lower the U-Value, the lower the amount of heat lost through the fabric; and therefore the lower the heating costs (both carbon and financial). However, the Building Regulations UK Part L (BRUKL) Output Report submitted by the developer suggest a much greater ground floor U-Value than stated in the developer's Energy Statement. This would increase the amount of heat loss through the building, and therefore increase the scheme's carbon footprint.

In addition, the developer's BRUKL report uses a baseline air permeability value of 10 m<sup>3</sup>/m<sup>2</sup>.hour, whereas Table 5 of the Building Regulations state that a typical air permeability baseline should be of 3 m<sup>3</sup>/m<sup>2</sup>.hour. By using such a high baseline, the developer has effectively inflated the actual performance of the building, and therefore made the building seem considerably more sustainable than it truly is.

Furthermore, much of the building's sustainability claims rely on the use of heat pumps. However, the efficiencies used in modelling the heating demand for the overwhelming majority of the building (East and West Block offices) are higher than the actual efficiencies of the Mitsubishi heat pumps specified by the developer. This would also artificially inflate the operational carbon performance of the building.

Finally, the developer has claimed that heat pumps will be used for 100% of the site heat demands. However, heat pumps are rarely used to meet the entire heating demand of a building, much less a building of this magnitude. This is due to the fact that, in the summer months, heat pumps would have to operate at a much lower capacity (because heating demand is lower in the summer) – something which heat pumps generally struggle to do (unlike gas boilers). This would lead to more maintenance and repairs; and would therefore hurt the cost-effectiveness of the heat pumps. In general, heat pumps are combined with gas boilers when heating a building, which would have to be accounted for in carbon calculations. The developer should therefore clarify how inefficiencies and



cost-effectiveness of heat pumps have been considered within the scheme. Until then, there will be serious concerns regarding the ability of the scheme to meet the 35% reduction in on-site regulated emissions mandated by the London Plan.

#### **London Plan Policy SI 2E – Unregulated Emissions**

The bulk of a building's carbon emissions are known as "unregulated". This constitutes emissions associated with, for instance, IT equipment, external lighting, and lifts. For the Hondo Tower specifically, the unregulated emissions stand at 286.7 tonnes of CO<sub>2</sub> per annum, whilst the regulated emissions stand at approximately 211 tonnes. The London Plan requires developers to highlight the steps taken to minimise unregulated emissions – the relevant information has *not* been provided by the developer.

#### **Whole Life Carbon – Compliance with GLA Benchmarks**

The Whole Life Cycle Assessment provided by the developer does not consider the replacement of key building elements such as stairs, lamps or internal walls, as well as the MEP (mechanical, electrical, plumbing) elements within the building. All of these elements are set to last less than 50% of the lifespan of the buildings; and will therefore need replacement at least once in the building's 60 year life. When these are accounted for, the building's total embodied carbon per metre square increases by 60% - which jeopardises the likelihood of the building complying with the GLA benchmarks for embodied carbon beyond the construction phase.

The development scores a sustainability value of E on the One Click Carbon Heroes scale (a carbon measuring tool used by the developer), which is the third worst of the 7 carbon ratings. However, the scheme manages to meet the GLA Aspirational Benchmark for carbon emissions up to and including construction (modules A1 to A5). This enormous disparity requires a detailed review of the scheme, and additional information provided by the developer as to how this carbon footprint was calculated.

#### **London Plan Policy G5 – Urban Greening factor**

The London Plan requires new builds to maintain and improve the greening of London. Compliance with this policy involves calculating an Urban Greening Factor, with the target being set at 0.3. However, due to the addition of solar panels within the scheme, the area available for green space on the roof of the structure considerably reduces. As a result, the UGF of the building would reduce to 0.27, which would result in the scheme failing to comply with London Plan Policy G5.

#### **Lambeth Policy EN 4 – Integral Consideration of Sustainability, and BREEAM certification**

This Lambeth Plan policy requires sustainability to be integral to the design of new buildings. However, the scheme's sustainability targets are met through the use of high-end technology such as heat pumps, not through passive design such as limitations to cold bridging, natural ventilation or balcony shading. Moreover, despite the U.K's temperate climate, the building's cooling demand (and therefore its cooling carbon footprint) is double its heating demand – which is due to the orientation and height of the building, as well as the quantity of glazing in the development. In addition, the developer's sustainability statement, which dates back to March 2020, scored the scheme a 0/3 in "Low Carbon Design", a category which specifically deals with passive design and the integration of sustainability.

Furthermore, Lambeth Plan Policy EN 4 requires building to achieve a BREEAM "Excellent" sustainability certification. However, the developer's Sustainability Statement asserts that, as it

stands, the scheme can only achieve a BREEAM rating of “Very Good”, *pending further work*. This additional design work has not materialised. To achieve BREEAM “Excellent” certification, the scheme would have to score a 6/13 in BREEAM’S “Reduction of energy use and carbon emissions” category – the scheme only scores a 4/13. This suggests that the scheme cannot achieve an “Excellent” certification, which would contradict Lambeth Policy EN4.

**In light of these considerations, I would like to speak at the hearing to highlight and expose these breaches of the London and Lambeth plans. I am happy for my name and e-mail to be shared.**

**I look forward to hearing from you.**

**Many thanks**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 May 2022 13:57  
**To:** Popes Road; [REDACTED]  
**Subject:** Request to speak at Popes Road Hearing objector

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear GLA officers, please accept this as a request to speak.

My name is [REDACTED],

[REDACTED] that are the closest to the site, I am speaking on behalf of all of my neighbours who, like me, run arts based business from the arches that adjoin the site.

[REDACTED] of Bureau Of Silly Ideas which is an Arts Council England National Portfolio Organisation. My work is predominantly in the public sphere and frequently focused in areas of regeneration suffering from economic and cultural famine.

I am known as a leader in my field and create programmes of engagement with strategic cultural development teams for local authorities and heritage sites.

(2022: - Lambeth, Fenland, Glasgow, Dundee and Shakespeare's Birthplace Trust).

[REDACTED] and have been making large scale public sphere art from Valentia Place since 1992.

My objections are: -

- There has been no accounting of the wider long term negative impact to both the cultural financial economies.
- If there ever was a cultural audit we were not included and are a National Portfolio organisation, along with our neighbours a globally significant community of cultural practitioners.
- There is mention of how we will be part of the new vision but no agreement in place as to what, where, when or how.
- There is talk about how we can be protected but nothing in writing
- We have had bad experiences of property damage and illegal removal of our property by Hondo contractors.
- The construction plan does not allow for us to operate
- The vehicle movement plan uses some land that we either have sole or comunal use of.
- There is nothing in place to protect us from the pollutants that will be created during the build.
- There are much better options for Brixton that need to be explored now that people know each other and that it is possible to create a better vision.

Based on the 2005 YouGov survey there will be a loss of £100k a year to the local grassroots economy from the lack of our workforce purchasing coffees and lunch. This contributes to

our estimate of a £17.5m loss in cultural trade and career training over the three and a half year planned build. (£5m a year). These figures are intelligent guesses that indicate the absolute need for more strategic analysis.

Culture is the mycelium that bonds community and creates growth in a local economy. Central Brixton is a vibrant community that thrives on cultural spores that have evolved over hundreds of years. This plan for two towers with a life span of decades does not consider how to look after cultural mycelium that is centuries old.

It will sanitise the ground like a scorched earth policy and rip out another piece of Lambeth's soul, in much the same way the floored regeneration scheme of central Brixton arches has.

I would like to attend in person, [REDACTED] is on standby to talk if I can't make it on the day.

Kind Regards

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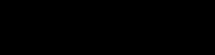
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[REDACTED]

*'magic & making people love disruptions'* [TEDx London City 2.0](#)

*'Public Space and Mischief Making'* [Construction Manager Magazine](#)

*'Repurposing Space - with not for people'* [Journal of Regeneration and Renewal](#)

  
**From:** HAYES, Helen <helen.hayes.mp@parliament.uk>  
**Sent:** 23 May 2022 13:51  
**To:** Popes Road  
**Subject:** Request to speak at the hearing  
**Attachments:** Second letter to Sadiq Khan.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged


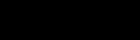
**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Team,

I hope you are well. Helen has asked me to notify you that she plans to speak at the public hearing on 10<sup>th</sup> June. I have attached a copy of Helen's most recent objection to the Mayor which sets out the key points Helen will be making in her speech.

Please do let me know if you require any further information.

With best wishes,

  
  
Parliamentary Assistant to Helen Hayes MP  
Member of Parliament for Dulwich and West Norwood

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Helen Hayes MP



HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Sadiq Khan  
Mayor of London  
Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Our Ref: ZA32414

16 December 2021

Dear Sadiq

**Planning Application reference: 2021/0265/S3  
Pope's Road, Brixton**

I am writing on behalf of my constituents to object to planning application reference 2021/0265/S3 for Pope's Road in Brixton, submitted by Hondo Enterprises. Along with the local ward councillors, I am opposed to this application and I am writing to set out the objections that I have previously submitted to Lambeth Council. I have been contacted by hundreds of constituents who are opposed to this application, who have shared their grave concerns about the long term impact that this building would have on the character, identity and economy of Brixton.

The site on Pope's Road is located immediately adjacent to two Conservation Areas characterised by the fine Victorian architecture of Electric Avenue and a series of listed buildings including Brixton Rec, Brixton Village and Market Row. It is also home to a multitude of diverse, independent, specialist retail businesses, many of them owned by traders from black and minority ethnic backgrounds, whose stories are an integral part of the history and identity of Brixton.

My objections to this application are on three grounds:

Firstly, the design is for a building more than twice the height of any other in the Conservation Areas and it is mediocre and bland. There is no planning policy justification for a building of this height in this location. Neither Lambeth Council's Local Plan nor the London Plan identify central Brixton as an area suitable for the development of tall buildings, and such an important principle should not be established through the precedent of an individual case.

The proposed building will not enhance the character of the Conservation Area or celebrate the identity of Brixton, but it would overshadow many of the surrounding businesses, homes and public spaces, blocking out sunlight. These adverse impacts are unacceptable. Historic England has objected to this application, and that objection should be taken seriously. It is possible to design new buildings which respect, enhance and celebrate their surrounding historic fabric, but this building falls far short of the high design standards and sensitivity to context required by such a significant location.

Secondly, this application should be rejected on grounds of sustainability, because any building of such size and significance, must meet the highest possible environmental standards in the context of the climate emergency we face. This building does not, and should not therefore be approved.

Thirdly, I am concerned about the viability of this proposal. Coronavirus has profoundly changed working patterns, with hundreds of thousands of Londoners now working from home. There is no evidence that there is demand for expensive, new-build office space in Brixton, and it is likely that there will be a structural surplus of office space across London, as many businesses downsize their premises in the context of hybrid working and increased home working. This building relies on businesses willing and able to pay high levels of rent in order for it to be viable to build, and to sustain the provision of the affordable workspace offer, but the applicant has never acknowledged

Dulwich and West Norwood  
[helen.hayes.mp@parliament.uk](mailto:helen.hayes.mp@parliament.uk)  
[helenhayes.org.uk](http://helenhayes.org.uk)

the impact of the coronavirus pandemic on the viability of their proposal, or modelled any post-pandemic demand scenario.

Under current planning rules, when no businesses can be found to pay the high levels of rent required to recoup the costs of a new-build tower, the building could be converted into luxury flats with no social housing, without the need for planning permission. In an area with very high housing need, that would be unconscionable.

I believe this application should be refused. A proposal is needed for this important site with the highest standards of design and sustainability which will enhance and protect the character of Brixton and serve the local community. This application falls far short.

I look forward to hearing from you.

Yours sincerely,



Helen Hayes MP

[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 27 May 2022 15:34  
**To:** [REDACTED]; Popes Road  
**Subject:** Right To Speak Request - June 10th Hearing

**CAUTION:** This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

I am submitting this request to speak for the upcoming hearing on June 10th related to the Pope's Road development project, GLA Reference: 2021/0265.

I would like to speak as a Supporter and will be attending in person, representing myself.  
I forward the below comment I shared with Lambeth Council on Nov 2, 2020 which outlines the details that I will reference during the allotted time.

Please advise if further information is required.

Regards,

[REDACTED]

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**From:** donotreply@lambeth.gov.uk <donotreply@lambeth.gov.uk>  
**Sent:** Monday, November 2, 2020 11:24 pm  
**To:** [REDACTED]  
**Subject:** Comments for Planning Application 20/01347/FUL

Mr [REDACTED],

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 11:24 PM on 02 Nov 2020 from [REDACTED]

## Application Summary

**Address:** 20 - 24 Pope's Road London SW9 8JB

**Proposal:** Demolition of the existing building and erection of a part five, part nine and part twenty storey building comprising flexible Class A1 (shops)/A3 (restaurants and cafes)/B1 (business)/D1 (non-residential Institutions)/D2 (assembly and leisure) uses at basement, ground 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|cr||cr|RECONSULTATION DUE TO EXTERNAL DESIGN CHANGES TO THE BUILDING FACADES AS WELL AS RELOCATION OF THE COMMUNITY FLOORSPEACE AT THE FIRST FLOOR LEVEL. PLEASE REFER TO THE SEPTEMBER 2020 COVER LETTER FOR FURTHER DETAILS.|cr||cr|This application is a DEPARTURE APPLICATION: The proposed development is a departure from Policy Q26, part (ii) and site allocation "Site 16 - Brixton Central (between the viaducts) SW9" of the Lambeth Local Plan (2015).|cr|

**Case Officer:** Mr Michael Cassidy

[Click for further information](#)

## Customer Details

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## Comments Details

**Commenter Type:** Neighbour/Public

**Stance:** Customer made comments in support of the Planning Application

**Reasons for comment:**

**Comments:** Dear Planning Committee,

I am submitting this comment in Support of this application for the below listed reasons. I understand that making decisions of this nature on behalf of the public can be both a difficult process and a great responsibility. I thank you in advance for your diligence and best efforts to do what you think is best for our community.

Reasons for Support:

1. Employment Opportunity
2. Economic Stimulation
3. Investment in Skills Development & Education
4. Improved Safety & Revitalisation
5. Local Investment in Infrastructure & Transportation
6. Acknowledgement of Key Concerns

Employment Opportunity

As I'm sure the applicant has articulated, I believe that Brixton can benefit greatly from the presence of higher paying job opportunities and the downstream benefits that these opportunities can offer our residents. The target tenants/sector (Architecture & Related Creative) is a strong match with the core skillsets and interests of our current and legacy residents and is evident based on my work in schools and with adult learning.

A key concern remains how to actually have these

opportunities materialise in a meaningful way for our residents. I believe that addressing this concern is chiefly a matter of strategic planning and resolve. Earlier today, myself and other local organisations met with members of the council and economic inclusion teams to begin this planning discussion and I believe we can create a plan that will yield results..

#### Economic Stimulation

I believe this is one area of benefit that doesn't require much reinforcement as the presence of additional professionals historically has a noticeable impact on local economies and we are already experiencing this here in Brixton. Again, the concern with this benefit is often related to whom participates in and benefits from this increased activity. I believe that existing traders will be early beneficiaries and that again with planning and intention, we can broaden that net to include other residents.

#### Skills Development & Education

The applicant has outlined plans to fund a range of skills development and education programmes intended to ready existing residents for the new opportunities. There are a number of local organisations with proven track records whom are ready to plan and deliver against this objective. Having spent the past 8 years working within common public education models, I see in this a great opportunity to develop new, targeted approaches that can have more direct and measurable results for our residents.

#### Improved Safety & Revitalisation

We are all aware of some of the very real challenges we face with regard to safety, anti-social behaviour, and the general hygiene/appeal of central Brixton. As much as we take pride in our character and culture, I think it important that we acknowledge where improvement is needed and not buy into the belief that we cannot retain the good while acting on this need. This is especially important for our young people who live in an entirely different version of Brixton than many of us do.

Anti-social and criminal activity are known to be positively impacted by investment activity as public spaces are reclaimed in the interest of the majority. I believe that the increased opportunity that comes with development also provides alternatives for young people, reducing the likelihood that they will turn to undesirable means of survival.

#### Investment in Infrastructure & Transportation

This is an area in which I have less personal experience but my research suggests that the private sector routinely plays an important role in the development of infrastructure and transportation in ways that are difficult to accomplish with the restraints of public investment.

With the growth that we are already seeing in our area and the desperate need we have to move our community to greener more sustainable transport means, this appears to be another benefit worth considering.

#### Acknowledgment of Key Concerns

Finally, I want to share my appreciation for some of the key concerns stated by those who are in opposition to this application. The departure from existing building standards, the impact on existing heritage sites, and the transformational impact the proposal will have on central Brixton are not trivial.

In the end, I feel it important to note that our existing standards were created by us as a community to reflect our interests and priorities at a given time and as such, should not serve to restrict us should our priorities change. How do we prioritise these interests against the very human needs of our residents and the future of Brixton?

I believe the Pope's Rd Development Proposal has a realistic opportunity to exceed expectations and like other landmark developments, become the exception to the rule. Especially if we embed sensible conditions into an approval. I hope you can see a similar opportunity as well.

Thank you for reviewing my comments and good luck to you as you work