

# GREATER **LONDON** AUTHORITY

## Good Growth

**Michael Cassidy**

Principal Planner (Strategic Applications)  
Planning, Transport and Development  
London Borough of Lambeth  
PO Box 734  
Winchester SO23 5DG

**Our ref:** GLA/5276/TO/01

**Your ref:** 20/01347/FUL

**Date:** 6 July 2020

Dear Michael,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**

**Site: 20-24 Pope's Road**

**Local Planning Authority reference: 20/01347/FUL**

I refer to the copy of the above planning application, which was received from you on 21 April 2020. On 6 July 2020 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/5276/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 71 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Andrew Milliken, e-mail [v\\_AndrewMilliken@tfl.gov.uk](mailto:v_AndrewMilliken@tfl.gov.uk), telephone 0203 054 1712.

Yours sincerely

A handwritten signature in black ink, reading 'John Finlayson' with a long horizontal flourish extending to the right.

**John Finlayson**

Head of Development Management

cc     Florence Eshalomi MP, London Assembly Constituency Member  
        Andrew Boff, Chair of London Assembly Planning Committee  
        National Planning Casework Unit, MHCLG  
        Lucinda Turner, TfL  
        Hannah Willcock, DP9, 100 Pall Mall, London, SW1Y 5NQ



**20-24a Popes Road, Brixton**

in the London Borough of Lambeth

planning application no. 20/01347/FUL

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

**The proposal**

Redevelopment to provide a new building ranging from 4 to 20-storeys comprising 25,445 sq.m offices, 647 sq.m community and assembly space and 28,100 sq.m flexible retail with associated landscaping and public realm works

**The applicant**

The applicant is **Hondo** and the architect is **Adjaye Associates**.

**Strategic issues**

**Principle of development:** In land use terms the proposed office-led redevelopment of the site, providing significant new employment floorspace, affordable workspace and flexible commercial uses within a town centre and strategic area for regeneration is strongly supported. However, on the basis that the Local Plan does not identify this as a suitable location for a tall building, the acceptability of the proposed scale must be justified by public benefits and other relevant material considerations. In this context further discussion is required with respect to the provision of publicly accessible spaces within the building, and the proposed affordable workspace must be appropriately secured (paragraphs 13-21).

**Urban design and Heritage:** Further amendments are required to improve the public realm. The configuration of the ground floor should be better rationalised to provide more active frontage and/or larger entrances to the building. GLA officers consider that the proposal would result in less than substantial harm to heritage assets. At this stage further work and discussions is required before the public benefits of the scheme are crystallised and the balance of these may be applied to the harm (paragraphs 22-44).

**Energy strategy:** Further information on renewable technologies, the proposed heat pump system, and carbon offset contributions should be provided (paragraphs 46-50)

**Transport:** The applicant is required to address issues in respect of; trip generation calculations, impact on public transport, Active Travel, delivery and servicing and disabled persons parking provision. The development will impact on public transport provision as such a contribution is sought to fund additional bus services. Financial contributions are also required towards cycle hire docking stations and Legible London signage. A delivery and servicing plan and a construction logistics plan should be secured by condition (paragraphs 55-62)

**Recommendation**

That Lambeth Council be advised that while the scheme is supported in land use terms, the application does not currently comply with the London Plan, for the reasons set out in paragraph 71 of this report.

## Context

1 On 12 May 2020 the Mayor of London received documents from Lambeth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- 1B.1(c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C.1(c) *“Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London.”*

3 Once Lambeth Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The application site comprises a funnel shaped parcel of land, situated between two large railway viaducts. The site is bound by Popes Road to the west, at its widest point, and Valentia Place to the east, at its narrowest point. To the north, beyond the railway, are a mix of commercial and residential uses. The statutorily listed Brixton Recreational Centre (Grade II) is opposite the site to the north west. Brixton Railway Station is located to the west of the site. To the south and south east, beyond the railway viaduct, are the Brixton Village indoor market and residential development. In the wider context to the south, is the main retail core of the Brixton town centre. The site lies in the context of the Brixton Street Markets along Brixton Station Road to the north, Popes Road and Electric Avenue to the west. The site comprises a single storey building currently in use as a retail store. The prevailing height of surrounding buildings is 2 to 5-storeys to the north, west and south, rising to 8-storeys to the east. The site is not within a conservation area but sits on the boundary of the Brixton and Loughborough Park Conservation Areas to the east, south and west.

6 The site is within the Brixton town centre boundary, which is identified as a major town centre in the London Plan. The site is also a Strategic Area for Regeneration and identified as one of the Mayors' Creative Enterprise Zones. The site forms part of a wider site allocation identified in Lambeth's Local Plan (Site 16), allocated for mixed use development comprising commercial, retail, community uses, educational, leisure, recreational uses and possible market extension. The allocation

also identifies the wider site as an opportunity to enhance pedestrian links and support improvements to Brixton Station.

7 The site is served by twenty bus routes within walking distance alongside Brixton (London Underground & National Rail) and Loughborough Junction National Rail Station. As such, the Public Transport Access Level (PTAL) of the site is 6b (on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport services). The closest section of the Transport for London Road Network (TLRN) is the A24 Brixton Road which is 160 metres away).

## **Details of the proposal**

8 The proposals would see the demolition of existing buildings and redevelopment of the site to provide an office-led mixed-use development comprising 25,445 sq.m offices, 647 sq.m community and assembly space and 28,100 sq.m flexible retail within a building ranging 4 to 20-storeys in height. The ground floor retail comprises a series of small retail units organised along the main circulation routes creating a market typology. Larger flexible units are located at first floor level which would provide either retail, community or assembly uses or workspace. Commercial office and workspaces are provided on the floors above.

## **Planning history**

9 An initial pre-application meeting was held with the GLA on 17 October 2019. GLA Officers advised that the principle of an office-led mixed use redevelopment of this highly accessible town centre site is supported in strategic planning terms, but issues raised with respect to town centre uses; urban design (including tall building, views and heritage impact); and, transport needed to be fully addressed by any planning application.

## **Strategic planning issues and relevant policies and guidance**

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Lambeth Local Plan 2015 and the 2016 London Plan (Consolidated with Alterations since 2011).

11 The following are relevant material considerations:

- National Planning Policy Framework (2019) and National Planning Practice Guidance.
- London Plan – Intend to publish version (December 2019)
- On 13 March 2020 the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.
- Draft Revised Lambeth Local Plan, submission version (January 2020)
- Brixton SPD (June 2013)

12 The relevant strategic issues and corresponding policies are as follows:

- Retail and town centre use *London Plan; intend to publish London Plan; Town Centres SPG*
- Employment *London Plan; Land for Industry and Transport SPG;*
- Culture *London Plan; Mayor's Cultural Strategy*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Urban design *London Plan; intend to publish London Plan; Shaping Neighbourhoods: Character and Context SPG; Accessible London: achieving an inclusive environment SPG*
- Historic environment *London Plan; intend to publish London Plan Shaping Neighbourhoods: Character and Context SPG*
- Transport *London Plan; intend to publish London Plan; the Mayor's Transport Strategy*
- Climate change *London Plan; intend to publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy*

## **Principle of development**

### Town Centre Regeneration

13 The site is within Brixton town centre, which is as identified as a Strategic Area for Regeneration in the London Plan and intend to publish London Plan. London Plan policy 2.15 and policies SD6 and SD7 of the intend to publish London Plan set objectives for development within town centres, supporting mixed-use development and a town centre first approach for commercial activity and town centre uses. The current proposal meets these objectives by providing a mixed-use, high density development, including a ground floor retail use which will support the existing active markets, in the centre of Brixton. The proposals are also in line with the borough's local plan allocation for a commercially-led mixed use development.

### Office-led redevelopment

14 London Plan Policy 4.2 'Offices', and Policies SD6 and E1 of the intend to publish London Plan support increases in the stock of offices of different sizes where there is evidence of demand, particularly within town centres where the provision of office floorspace is an important contributor to the local and London-wide economy. Policy E2 of the intend to publish London Plan provides that larger office proposals should consider the scope for provision of some flexible workspace suitable for micro, small and medium sized enterprises. The proposal seeks to introduce approximately 13,000 sq.m of new office floorspace which is significant in the context of Brixton, which is not an existing office destination and where there is a distinct undersupply of office floorspace, given it is a highly accessible major town centre. This is reflected in the intend to publish London Plan Town Centre Network office guidelines. GLA officers recognise the potential for growth of office provision within Brixton town centre and the potential for the site to enhance the environment and the offer of the centre as a

commercial location, supporting the delivery of significant economic benefits to the local economy and wider regeneration objectives. Accordingly, the principle of an office-led redevelopment of the site is supported.

15 Policy HC5 of the intend to publish London Plan supports the continued growth of London's diverse and cultural facilities and creative industries. Brixton is identified as a Creative Enterprise Zone (CEZ) which seeks to develop and deliver new spaces to serve the emerging digital and creative cluster located in the area. The development would provide flexible workspace suitable for occupation by a range of business sizes, which is welcomed. As advised in pre-application discussions, further consideration should also be given to the capacity for the development to provide a broader scope of compatible workspaces typologies, beyond office, such as studios or maker spaces, having regard for the site's location within a strategic area for regeneration and a CEZ, to ensure that the development responds to the local economy context.

### Affordable Workspace

16 The proposals seek to incorporate a proportion of the development as affordable workspace which is strongly supported in line with policy E3 of the intend to publish London Plan, particularly given the site is within a CEZ where it is desirable to sustain a mix of business or cultural uses which contribute to the character of the area. The Council's submission Local Plan Policy ED2 requires that in the Brixton CEZ (within the town centre boundary), developments proposing greater than 10,000sqm B1 office floorspace should provide 10 per cent of that floorspace as affordable workspace at 50% of market rents for a period of 25 years. Compliance with this policy should be confirmed by the applicant and these details together with details of the location of the affordable workspace, management and delivery mechanism should be secured in the Section 106 agreement.

### Retail, leisure and community use

17 London Plan policies 4.7 and 4.8 and intend to publish London Plan policies SD6 & SD7 promote the growth of a successful and diverse retail sector within highly sustainable town centre locations. Policy E9 further encourages development to support markets in their full variety, including street markets and covered markets and measures to support the management of existing markets to enhance their offer and contribute to local identity and the vitality of the town centre.

18 The proposals seek to provide approximately 2,400 sqm of flexible commercial floorspace across the ground and first floors. The applicant envisages the ground floor being primarily occupied in retail use, with a similar layout and typology as the covered markets and Brixton Village and Market Row. The first floor would provide larger floorplates for larger commercial or retail uses. GLA officers welcome the scheme's proposals to augment the existing market offer within Brixton and broadly support the principle of the retail offer. In order to ensure that the proposals promote growth and do not result in a significant reduction in retail provision within the town centre, a minimum quantum of retail use should be secured at ground floor level.

19 Further detail on the management of the new market retail element in terms of servicing and storage and access arrangements should be provided as these matters



would have wider implications on the functioning of the market use and the success of its integration into the existing market context. Specifically, the applicant should demonstrate that the proposals would contribute to the diversity of the retail offer and not add to existing servicing issues with regard to storage and refuse. Measures to alleviate servicing issues within the existing markets would add to the public benefits of the proposal and should be investigated.

20 Intend to publish SD6, E9 and & S1-S3 support proposals that provide a diverse range of uses within town centres including, leisure and assembly uses and high quality social infrastructure, particularly in places easily accessible by public transport, cycling and walking. The flexibility to provide leisure and community uses within the development is wholly appropriate given the site's highly accessible town centre location, accords with Lambeth's site allocation and will contribute towards the overall character and activity within the development, adding diversity to the mix of uses found locally.

#### Publicly accessible space within the building

21 Prominent tall buildings, such as that proposed here, should incorporate free to enter publicly accessible areas within their design in accordance with London Plan Policy 7.7 and Policy D9 of the intend to publish London Plan. Such spaces should normally be located at the top of the building to provide wider views across London. In this instance, the applicant is proposing a multifunctional central space at ground and first floor level. Whilst this space would provide some public benefit, it is constrained and compromised by its dual function as circulation space and provides no views out of the building departing from the general height principle set out above. The applicant is strongly encouraged to provide additional publicly accessible space on the upper floors of the building.

22 The proposed relocation of public toilets on Pope's Road within the site would represent a significant improvement to the quality and quantity of the existing public facilities and creates the opportunity of public realm improvements through the removal of the existing toilet block. These proposals are as such strongly supported. Further clarity on management and access arrangements to the toilets should be provided. 24 hour access should be provided in line with Policy S6 of the intend to publish London plan, such details should be secured in a section 106 agreement.

### **Urban design**

23 Good design is central to all objectives of the London Plan and the Mayor's intend to publish London Plan. Policies contained within chapter seven of the London Plan, and chapter three the of the intend to publish London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

#### Site Layout

24 The site is located close to Brixton station and is within a constrained plot bounded by railway tracks along the north and south. The approach to the site layout is well-conceived within the constraints and supported. The development has potential to play a key role in terms of increased permeability and stitching together wider public

realm improvements in the town centre. As such, further clarity is sought on efforts to deliver a north south link through the site, particularly a link between the proposal site and Brixton Village.

25 Retail frontages are located along the main entrance towards Pope's Road providing an active frontage. However, the size and location of the west office lobby occupies a large portion of the ground floor and positions a series of fire doors to the front of the building. This arrangement reduces the active frontage of the site and compromises the entrances to the building which should be larger and more celebrated features given the buildings prominence and the need to for the building to contribute to safe and attractive public space at ground floor level. The applicant should investigate ways to better rationalise the configuration of the ground floor to provide more active frontage and/or larger entrances to the building.

26 The office lobbies are located within the publicly accessible internal market bringing activity towards the centre of the site which is supported.

27 Whilst the long term aspirations to connect the development to the railway arches to the north and south are noted, further clarity is required on the access, management and treatment of interface between the development and the railway arches in the interim. The long narrow stretches may create an environment for anti-social behaviour at night and measures should be in place to safeguard against this.

28 The provision of a sheltered, multi-functional public space at the centre of the site is welcomed and further presents an opportunity to integrate the site in the local context. Details of the management and curation of this spaces should be secured by condition.

### Public Realm

29 The proposed building frontage towards Pope's Road steps back by 1m from the original building line and the ground floor is pulled back by 6m to create a double height recessed covered entrance. The applicant proposes to relocate an existing public toilet within the basement of the proposal to create an unobstructed public space on Pope's Road. This approach is strongly supported and would represent a significant improvement to the pedestrian environment at ground floor level. GLA officers strongly encourage the applicant to continue to engage with Lambeth Council to explore delivery options. Accessibility for a range of users, including disabled people, opening hours and signage for the toilets should be considered and details submitted to ensure the facility continues to be accessible and perceptible from the public realm.

30 Given the potential for a new Brixton Station entrance onto Popes Road, it is important that the proposed development responds to the potential future role of this area as public space and arrival point. The applicant should therefore investigate options to set the overall building footprint back further than 1m to provide more generous public space and support the efficient functioning of any new station entrance.

### Height/tall building

31 London Plan Policies 7.1 and 7.4 and Policies D1 and D2 of the intend to publish London Plan both require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings, and Policy D3 promotes the optimisation of a site's capacity, with higher density developments in areas that are well connected to services and public transport. Further to this, Policy D9 of the intend to publish London Plan sets out that locations for tall buildings should be plan-led, and that development proposals for tall buildings should address their visual, functional, environmental and cumulative impacts.

32 As discussed in paragraphs 6 and 7, the site is located at the heart of Brixton major town centre (PTAL 6b), within a Strategic Area for Regeneration and a Creative Enterprise Zone. Notwithstanding this, the prevailing character of Brixton town centre is low-rise, and the site is in close proximity to Brixton and Loughborough Park Conservation Areas to the east, south and west (as well as various other designated heritage assets). Further to this it is noted that Appendix 11 of the Lambeth Local Plan identifies the application site as within an area that is sensitive to tall buildings and where the local authority would support low-rise buildings in response to this context, as set out in the site allocation. Therefore, whilst there are various characteristics of this site that offer the potential to support a tall building (including the town centre location and high level of public transport accessibility), this is a location that the local plan envisages as sensitive to tall buildings - given the sensitivities of the context. Noting that Intend to Publish London Plan Policy D9 states that tall buildings should only be developed in locations that are identified in development plans, it falls to officers to consider whether there might be material considerations that could justify a tall building at this site. Key to this exercise will be a robust assessment of the impact of the proposed tall building against the criteria within London Plan Policy 7.7 and Intend to Publish London Plan Policy D9, in conjunction with consideration of the public benefits of the proposal.

### *Visual impacts*

33 The development is composed of two volumes with a 20 storey tower element to the west of the site fronting Popes Road and a block to the east stepping down to 8 storeys. The development represents a significant step change from the prevailing height of adjoining and surrounding development, and means that the proposal would be visible from various locations within the vicinity. In terms of townscape legibility this would allow the proposal to support wayfinding within the town centre by landmarking the station, however, it could also lead to impacts on local views and heritage assets which must be carefully considered. The applicant has submitted a Townscape, Heritage and Visual Impact study which includes accurate visual representations of the proposal from various important local viewpoints, and includes an assessment of heritage impact. Having considered this, and notwithstanding the assessment of the impact of the proposals on heritage assets which must be read in the context of paragraphs 194 & 195 of the NPPF and is addressed in full below, GLA officers have concluded that the development would make a positive contribution in immediate views, through the replacement of the existing poor quality building, and to the local townscape and skyline, through the development of a landmark building of high architectural quality.

### *Functional impacts*

34 Whilst the building has been designed to accommodate the functional requirements of the proposed uses, as discussed in paragraphs 24 to 28 GLA officers are seeking further clarity on future links between the site and the neighbouring markets, improvements to the Pope's Road frontage and entrances and further clarity on the interim access arrangements and treatment of the ground floor frontages to the railway arches.

35 Further to this and in line with Policy D12 of the intend to publish London Plan a fire statement should be prepared prior to commencement by a third party suitably qualified assessor demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

#### *Environmental impact*

36 In terms of local microclimate the impact of the building on wind and pedestrian comfort levels within the proposed new public spaces has been assessed and modelling findings have fed into the design of the building. A wind mitigation strategy has been development which seeks to reduce potential for downward or accelerated wind, with mitigation proposed through tree planting and building materials. Subject to conditions securing the implementation of the recommendations set out in the wind mitigation strategy, GLA officers do not anticipate any significant wind microclimate issues in pedestrian areas surrounding the site. Lambeth Council will undertake a full review of the environmental impacts as part of their assessment of the proposal as local planning authority. GLA officers will work with the Council to ensure that any necessary environmental mitigation measures would be appropriately secured.

#### *Cumulative impacts*

37 The submitted Townscape, Heritage and Visual Impact study includes wireline visualisations of other consented development in the relevant long-range view allowing for an assessment of cumulative townscape and heritage impact. Having considered this, in conjunction with the assessment of strategic planning issues contained within this report, GLA officers are satisfied that there are no residual cumulative impacts of significance in strategic planning terms.

#### *Public Access*

38 Whilst the building provides publicly accessible sapce at ground and first floor level, as discussed in paragraph 21, given the prominence of the building within Brixton and the compromised nature of the spaces proposed, GLA officers are seeking additional publicly accessible space on the upper floors of the building.

#### Height/tall building - conclusion

39 Having regard to the above assessment, the height of the proposed development can be supported, subject to the resolution of the outstanding matters raised above and an assessment of the heritage impact of the proposals,

#### Architecture

40 Notwithstanding the principle point concerning the suitability of this site for a tall building from a planning policy perspective, GLA officers are of the view that the massing, design and materiality of the proposal has been generally well-considered in design terms, having regard to its immediate and wider context. The building would be visually distinctive in medium and local views with ordered and textured concrete and brick facades which successfully convey a sense of human scale. The north facing facade of the building is articulated with concrete linear trays, a central concrete pier, and concrete structural bracing. The east and west elevations comprise of repetitive modular arched openings, with distinctive stepped brick apron and piers, and concrete lintels running across creating distinctive banding. The proposed material palette is contextual and the applicant has provided a good level of detail on facade articulation, details of which should be secured by condition. Overall, GLA officers are of the view that the proposed building represents high quality architecture.

## Heritage

41 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*". Case law has established that there should be a strong presumption against granting permission that would harm a listed building or the character or appearance of a conservation area. A finding of harm must be given considerable importance and weight.

42 The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Any harm to a heritage asset should be given substantial importance and weight in any planning balance. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

43 London Plan Policy 7.8, states that development affecting heritage assets should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Policy HC1 of the intend to publish London Plan further specifies that the cumulative impacts from incremental change from development on heritage assets and their setting should be actively managed and that development proposals should avoid harm.

44 The site is not within a conservation area or contain any statutorily listed or locally listed Buildings. There are a number of listed buildings and structures lying within 250m of the site, these include: the Brixton Academy (grade II\*) to the north west, Brixton Recreation Centre (grade II) sited immediately to the north west of the site, Brixton Fire Station (grade II) to the east of the site, The Ritzy Cinema, Tate Library, Effra House and Lambeth Town Hall (all grade II) are all sited to the south west of the site. The Mausoleum of Richard Budd and Church of St Matthew (grade II\*) are sited further to the south west. The nearest conservation areas to the site (within 250 of the site) are the Brixton Conservation Area immediately to the south and west of the site and Loughborough Park Conservation Area to the south and east west. Further south is the Brockwell Park Conservation Area which contains Brockwell Park, a listed park and garden (grade II). Given the scale, orientation and form of development surrounding the site, the proposed development has the potential to affect the setting of a number designated heritage assets in the wider area.

45 The development would be clearly visible and prominent in a number of key views from within the Brixton Conservation Area looking east along Brixton Station Road, north along Atlantic Road and, most prominently, looking north at the bend on Electric Avenue. Given the proximity of the site, the architecture and materiality of the building would be clearly perceptible in views from within the conservation area. In all cases, given the prevailing height of surrounding development and the lack of any buildings of comparable scale, the development rises prominently above established rooflines within the conservation area and notably impacts upon its setting. The proposed development also appears prominently above the roofline of the Grade II\* St Matthews Church impacting on views of the church looking north along Brixton Hill from within the Brixton Conservation Area. The development would significantly impact upon views from key areas within the Brixton Conservation Area and would as such give rise to some harm to its significance.

46 The development would be clearly visible and prominent in the background of views from within Brockwell Park, rising distinctly above the tree line. The visibility of development over the tree line from within the park is established with existing development and the emerging Vauxhall tall building cluster. However, the proposed development would appear evidently closer to the viewpoint, given its proximity, and stands alone, not forming part of a wider cluster of tall buildings, given the low rise nature of surrounding development. The development would as such impact upon views from within this part of the Brockwell Park conservation area and would give rise to some harm to its significance as well as the significance of the Grade II listed Brockwell Park and Gardens.

47 Given the scale and alignment of existing surrounding development and the location and height of the proposals, the development would be hidden from key views from Loughborough Conservation Area. The development is as such considered to not cause harm to the heritage significance of this asset.

48 The application is supported by a Townscape, Heritage and Visual Impact Assessment (THVIA). GLA officers have carefully considered the submitted proposals and the THVIA and have concluded that the proposal would result in less than substantial harm to the Brixton Conservation Area, Brockwell Park Conservation Area and Brockwell Park and Gardens and the Grade II\* listed St Matthews Church.

49 The public benefits arising from the development include the delivery of new office and commercial floorspace, affordable workspace, the regeneration of the site and new public space. However, as considered above, the investigation of further public realm improvements is required, the internal public space is compromised in its size and location, the terms of the affordable workspace have not been confirmed and there are concerns with the layout of the ground floor and the buildings interface with the rail arches. These matters are intrinsically linked to the public benefits balance, and will be a key part of the consideration in terms of whether such benefits may cumulatively outweigh the less than substantial harm identified above. GLA officers seek further discussion with the Council and the applicant team on these matters, as well as the mechanisms for securing and delivering the public benefits concerned.

## **Inclusive access**

50 London Plan Policy 7.2 and Policy D3 of the intend to publish London Plan require that all new development achieves the highest standards of accessibility and inclusive design. Level access would be provided to all of the proposed office and retail floorspace with lift access provided to all floors. The application complies with the London Plan, intend to publish London Plan in respect of inclusive design.

## **Climate Change**

### Energy

51 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the Intend to publish London Plan, the applicant has submitted an energy strategy, setting out how the development proposes to reduce carbon dioxide emissions. Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 66.7 tonnes per annum (19%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development.

52 The applicant is not proposing to install any renewable energy technology for the development. The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. This is regardless of whether the 35% on-site CO<sub>2</sub> emission improvement target has already been reached through earlier stages of the energy hierarchy. The applicant is, therefore, required to reinvestigate the inclusion of renewable technologies. A roof layout should be provided to demonstrate that there is no potential for PV as concluded within the energy statement.

53 A centralised air to water heat pump system is being proposed. Further information is required on the heat pumps as set out in the detailed comments provided separately.

54 The carbon dioxide savings fall short of the on-site target within the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions/In this instance it is accepted that there is little further potential for carbon dioxide reductions onsite.

55 The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough.

#### Flood risk, drainage and water

56 The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and policy SI.12 of the intend to publish London Plan.

57 The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 policy SI.13 of the intend to publish London Plan, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided.

58 The proposed development generally meets the requirements of London Plan policy 5.15 (and intend to publish London Plan policy SI.5). The Applicant should also consider water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

#### Green infrastructure

59 The proposed development offers very limited urban greening at ground and roof level. The London Plan is clear that the design process should embed urban greening as a fundamental element of site and building design. In accordance with Policy G5 of the intend to publish London Plan, the applicant should calculate and provide the Urban Greening Factor (UGF) score for the proposed development and meet the minimum specified target of 0.3. A drawing showing the surface cover types and accompanying UGF calculation should be submitted prior to Stage 2. By integrating green roofs across the proposed development a UGF score of 0.3 should be readily achievable.

## **Transport**

#### Trip generation

60 The proposed trip generation has been calculated using the TRICS database and 2011 Census data. The applicant has excluded the proposed market space and community from the provided trip generation, stating that these will be secondary, linked trips. This is not accepted, and trip generation for these uses should be provided also to enable their impact to be fully evaluated. The TA should now consider the new TfL Streetspace for London guidance; creating more space on streets so people can walk or cycle while social distancing. New development should be designed to support temporary and potentially permanent changes being made through Streetspace for London<sup>1</sup>.

---

<sup>1</sup> [Streetspace for London plan. \(https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/highway-works\)](https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/highway-works).



61 The trip generation has identified significant impact on bus services in the area. Specifically, the proposals put stress on the 238 service, which is currently at capacity. A contribution of £1.125million is required to fund the provision of additional services to accommodate the extra demand for five years. This has been calculated at £75k per return journey, per year for five years. The proposals would result in an increase in demand for cycle hire facilities in the local area. As such, a contribution of £220k is required to fund one additional cycle hire station with approximately 35 docking points, space should be set aside within the development to accommodate this.

### Healthy Streets

62 The applicant has carried out an Active Travel Assessment, which is welcomed and in line with the Mayors Healthy Streets approach. Two routes have been identified and assessed as part of the ATZ, which has identified numerous issues along the routes, highlighting their non-compliance with the 10 Healthy Streets Indicators. The applicant also notes the high levels of collisions along the routes evaluated. In line with the Mayors Healthy Streets (MTS) approach and Vision Zero target, the applicant should work with the LPA and other stakeholders to identify measures that can be brought forward to combat some of these issues as part of this application.

63 To improve legibility to and from the site and through Brixton more widely, Legible London signage should be integrated, to sign post significant local sites, and highlight pedestrian, cycle and public transport modes in the local area. A contribution of £15k is sought fund new signage and/or updated maps in the area.

### Car parking

64 The car free nature of the proposal is supported. However, the scheme under provides blue badge parking spaces. Policy T6.5 of the intend to publish London plan states one blue badge space should be provided for each element of the proposal. As such, 3 blue badge parking spaces should be provided. Given the small number of spaces to be provided, all blue badge spaces must be equipped with an active electric vehicle charging point.

### Cycle parking

65 The applicant has proposed a total of 411 cycle parking spaces, in the form of 381 long stay spaces and 30 short stay spaces. Parking for the 2190 sqm of A1 market space, has been calculated using standards for 50% of the floor space as A1 and 50% as A3 space. All cycle parking should be provided in line with the London Cycle Design Standards (LCDS), with provision made for larger and adapted cycles. Short stay spaces should be integrated within the site's public realm, where appropriate, with long stay spaces provided in a safe and secure area. The provision of shower and locker facilities as part of the cycle storage is welcomed and contributes toward the MTS targets for mode shift.

### Servicing and construction

66 It is understood that the applicant proposes to service all uses on site using both Popes road, when pedestrianisation restrictions allow, and Valentia Place. Whilst the analysis undertaken by the applicant shows that there is ample capacity between these roads to service the site, the applicant should address safety concerns surrounding the high volumes of pedestrians and cyclists in the area. Servicing activity should be carefully managed, with full details set out within the applicants Delivery and Serving Plan (DSP), which should be secured by condition.

67 A detailed Construction Logistics Plan (CLP) should also be secured by condition and prepared in accordance with TfL's guidance. It is understood that London Underground Infrastructure Protection (LUIP) have been consulted separately as part of the application process. Proposed highway works in London may now need to be redesigned, delayed or implemented differently due to the Mayor's and TfL's latest plans for social distancing on streets across the city. These comments do not represent those of LUIP, whose comments should be engaged with separately regarding impacts upon LU assets and construction practices.

## **Local Authority's Position**

68 Lambeth Council officers are currently assessing the application and anticipate amendments which will require a further round of consultation prior to the submission of an officer recommendation.

## **Legal considerations**

69 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

## **Financial considerations**

70 There are no financial considerations at this stage.

## **Conclusion**

71 London Plan and intend to publish London Plan policies on; town centre uses, retail, employment, urban design, inclusive access, energy, flood risk and sustainable drainage and transport are relevant to this application. Whilst the scheme is supported in land use terms, the application does not currently comply with the London Plan and the intend to publish London Plan as set out below:

- **Principle of development:** In land use terms the proposed office-led redevelopment of the site, providing significant new employment floorspace, affordable workspace and flexible commercial uses within a town centre and strategic area for regeneration is strongly supported. However, on the basis that the Local Plan does not identify this a suitable location for a tall building, the acceptability of the proposed scale must be justified by public benefits and other relevant material considerations. In this context further discussion is required with respect to the provision of publicly accessible spaces within the building, and the proposed affordable workspace must be appropriately secured.
- **Urban design and historic environment:** Further amendments are required to improve the public realm. The configuration of the ground floor should be better rationalised to provide more active frontage and/or larger entrances to the building. GLA officers consider that the proposal would result in less than substantial harm to heritage assets. At this stage further work and discussions is required before the public benefits of the scheme are crystallised and the balance of these may be applied to the harm.
- **Climate change:** The applicant should investigate the inclusion of renewable technologies. Further information is required on the proposed centralised heat pump system and additional measures to achieve further carbon reductions. The shortfall in CO2 reductions should be met through an offset contribution. The applicant is required to provide further information on the surface water drainage strategy, water harvesting and reuse measures and measures to achieve a minimum 0.3 UGF.
- **Transport:** The applicant is required to address issues in respect of; trip generation calculations, impact on public transport, Active Travel, delivery and servicing and disabled persons parking provision. The development will impact on public transport provision as such a contribution is sought to fund additional bus services. Financial contributions are also required towards cycle hire docking stations and Legible London signage. A delivery and servicing plan and a construction logistics plan should be secured by condition.

---

for further information, contact GLA Planning Unit (Development Management Team):

**Lucinda Turner, Assistant Director - Planning**

020 7983 4000 email [Lucinda.Turner@london.gov.uk](mailto:Lucinda.Turner@london.gov.uk)

**John Finlayson, Head of Development Management**

020 7084 2632 email [John.Finlayson@london.gov.uk](mailto:John.Finlayson@london.gov.uk)

**Allison Flight, Deputy Head of Development Management**

078 4004 6318 email [Alison.Flight@london.gov.uk](mailto:Alison.Flight@london.gov.uk)

**Graham Clements, Team Leader – Development Management**

020 7983 4265 email [Graham.Clements@london.gov.uk](mailto:Graham.Clements@london.gov.uk)

**Toyin Omodara, Principal Strategic Planner**

020 8039 1272 email [Toyin.Omodara@london.gov.uk](mailto:Toyin.Omodara@london.gov.uk)

---