

Our reference: MGLA021221-9068

Date: 12 January 2022

Dear [REDACTED]

Thank you for your further request for information which the Greater London Authority (GLA) received on 13 November 2021. Your request has been considered under the Environmental information regulations (EIR) 2004.

In relation to the Pope's Road planning application, you requested:

*Please could you provide us with all GLA correspondence and notes of meetings etc in relation to this application from 22nd July 2021 until today's date. [13 November 2021]*

Please find attached the information we hold within the scope of your request. A small amount of the content has been redacted under the exception to disclose at Regulation 12(4)(e) (Internal communications) and Regulation 12 (5)(e) (Commercial confidentiality). Some further information has been redacted because it is out of scope of your request (i.e salutations, references to other sites) or because it is personal information (Regulation 13).

Information that identifies specific employees constitutes as personal data which 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

Regulation 12(4)(e) applies to communications explicitly whereby GLA officials have engaged in free and frank discussions on matters pertaining to the Pope Road planning application. The exception is engaged in order to protect the necessary space for GLA officials to explore ideas in private against the backdrop of a project which is under great public, media and political scrutiny.

In relation to the content withheld under the exception to disclose in Regulation 12 (5)(e) (confidentiality of commercial or industrial information) of the EIR. Applying the four-stage test from *Bristol City Council v Information Commissioner and Portland and Brunswick Squares Association (EA/2010/0012, 24 May 2010)*:

1. The information is commercial or industrial in nature: The redacted information the report details third party contractual information. The information can therefore be considered as commercial or industrial in nature.

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2. Confidentiality is provided by law: The information is covered by the common law obligation of confidentiality, the information is not trivial in nature, nor is it in the public domain. The information was disclosed to the GLA on a voluntary basis on the expectation and understanding that they would be held in confidence. The redacted Information is therefore to be protected by confidentiality provided by law.
3. The confidentiality is protecting a legitimate economic interest.  
[REDACTED] confidentiality would be adversely affected by disclosure. Disclosure of the [REDACTED] confidential nature of it and therefore the exemption at Regulation 12(5)(e) is engaged in respect of disclosure of the redacted information

Regulation 12 (4)(e) and Regulation 12(5)(e) constitute as qualified exemptions from our duty to disclose information under the EIR, and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest [REDACTED]s favouring maintaining the exemption and withholding the information.

Effective decision making should be informed by engaging with the public and key stakeholders; however, this engagement needs to be structured to be effective. Release of this information at this time would divert attention and resources away from the task at hand and towards responding to enquiries whilst discussions are still ongoing. This in turn would also be likely to have an adverse effect on the GLA's ability to engage in free-flowing and honest exchanges of views in the future as it is likely that officials would become reluctant to explore all options.

The GLA acknowledges that there is a public interest in transparency in relation to planning and development matters, disclosure would enable the local community to understand more fully the decision-making process. The best interest of the public – i.e. the public interest – is best served by ensuring that public authorities continue to debate robustly and comprehensively, considering all options and their potential impacts, for the best possible decisions to be taken.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA021221-9068

Yours sincerely

[REDACTED]  
**Information Governance Officer**

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>

## 20-24a Pope's Road



## Introduction

Popes Road is an important local regeneration scheme for Brixton. It comprises an ecosystem of workspace and supporting amenities and responds positively to the unique character and function of Brixton.

It is designed by Adjaye Associates.

Following extensive pre-application, the application was submitted in April 2020. The genesis of the project began under then adopted London Plan policy which directed tall buildings to town centres like Brixton. The scheme has evolved during the progression and adoption of the new London Plan in March 2021. Lambeth committee resolved to grant planning permission at the November 2020 Planning Applications Committee. The application was advertised as a Departure from the development plan on the basis that the site is not allocated for a tall building but the wider area is seen as having potential and that the balance of benefits delivered outweighed the conflict with those policies. It was referred to the GLA under the Stage 2 procedure in December and the Mayor allowed Lambeth to continue to determine the application. In December 2020, correspondence was sent by lawyers acting for “Fight the Tower” to the GLA claiming that the Stage 2 was defective. The first Stage 2 was rescinded in January 2021. On 1st March 2021, the Mayor considered the second Stage 2 report where officers maintained their December 2020 recommendation to allow Lambeth to continue to determine the application.

The Mayor decided to call-in the application to enable him to further scrutinise the impacts and benefits of the scheme. Officers have requested that other height scenarios are produced for study and this document presents those studies and explains how this might impact the balance of benefits.



## Brief

Brixton is a key town centre in the heart of Lambeth. It contains a diverse mix of uses and character. It is in a highly accessible location. It has not been a traditional office location but town centres are a preferred location for new office development. The diversification of town centre activities is also supported by policy.

The brief for Popes Road was to create an office ecosystem with supporting amenities to attract a range of occupiers to Brixton and to allow flourishing new and small businesses somewhere to expand. After Lambeth Council's investment in the Town Hall and the refurbishment of the Department Store and the Piano Works there has been increased interest in Brixton as an office location. Popes Road forms part of a group of sites known as Brixton Central, which the Council is promoting as a local regeneration initiative including significant employment and job creation. Popes Road is at the heart of this initiative. The brief for Popes Road was therefore to create a critical mass of office to enable this ecosystem to succeed. Through various research and Savills agency studies, the critical mass was identified as 200,000sq ft to 250,000sq ft. This is commensurate with other developments in initially non-recognised office locations such as White Collar Factory in Old Street and the Relay Building in Aldgate.

## Scheme Evolution

Adjaye Associates was selected as the architect because of their track record at create strong place making and public realm, particularly eroding the threshold of indoor and outdoor space. Adjaye are also pioneers in the creation of social programmes that benefit local communities. As well as designing Popes Road they have also recently unveiled the Cherry Groce Memorial in Windrush Square. Adjaye recently received the RIBA Gold Medal Prize 2021.

He is undeniably one of the UK and the world's leading architects.

Pre-application discussions begun based on a 23 storey scheme totalling about 240,000sq ft. It was and remains Hon-do's opinion that this struck the right balance of townscape response, architectural elegance and providing a critical mass of office space to create the ecosystem. During discussions, Lambeth assessed the impact of this scheme and concluded that 23 storeys was too visible in a number views from within the Brixton Conservation Area. It was agreed to reduce the height to 20 storeys striking a new balance of heritage impact and public benefits. At 20 storeys, the scheme creates 200,000sq ft offices within but at the bottom end of the critical mass to create the business ecosystem. Through further discussion the extent of public benefits was dialled up considerably and significantly exceeds what would be required under policy.

## **Summary of Public Benefits**

Summary of Public Benefits at 20 storeys

New public toilets in the scheme managed by Hondo – worth £500,000

New public square on Popes Road including public art – worth £1,000,000

Community floorspace – 2,140 sq ft net internal area

Developer outreach programme

Hondo community officer

Lambeth community officer – worth £90,000

Employment and training contribution – endowment over 25 years worth £1,875,000

Affordable workspace – 24,767 sq ft net internal area representing 12.5% of total

Creation of 1,800 new jobs

Mayoral CIL worth £1,618,457

## Conclusion

Popes Road is a locally vital regeneration scheme.

It seeks to create an office ecosystem within Brixton Central. The lowest critical mass for this ecosystem is 200,000sq ft. This study shows the visual change in height of the building at 14, 16 and 18 storeys. It shows that these notional changes would only lead to a modest change in the extent of visibility in these views particularly the most prominent positions in Electric Avenue and the Town Hall steps. At 14 storeys there is a noticeable reduction in visibility from the Town Hall steps and St Matthew's Church. It is above 14 storeys that Lambeth had stated that harm would arise. Any reduction below 20 storeys the scheme would no longer provide the minimum critical mass to create the office ecosystem so the delivery is called into serious question. It would not be possible to maintain the policy exceeding benefits package below 20 storeys even if the scheme could create the ecosystem. We have not sought to itemise those benefits which would be removed as we contend that 20 storeys represents the minimum critical mass. At 20 storeys, the design is part of a careful consideration of proportion and scale. This slenderness ratio would be reduced if the height is reduced and the greater the height reduction the less elegant it becomes and therefore the architectural distinction is diminished.

Hondo Initial Proposal to LBL for a 23 storeys scheme

View 26 - Electric Avenue East



## 23 Storeys

View 26 - Electric Avenue East





# 20 Storeys

View 26 - Electric Avenue East





# 18 Storeys

View 26 - Electric Avenue East





# 16 Storeys

View 26 - Electric Avenue East





# 14 Storeys

View 26 - Electric Avenue East



Hondo Initial Proposal to LBL for a 23 storeys scheme

View 13 - Brixton Hill\_Lambeth Town Hall



# 23 Storeys

View 13 - Brixton Hill\_Lambeth Town Hall





# 20 Storeys

View 13 - Brixton Hill\_Lambeth Town Hall





# 18 Storeys

View 13 - Brixton Hill\_Lambeth Town Hall





# 16 Storeys

View 13 - Brixton Hill\_Lambeth Town Hall





# 14 Storeys

View 13 - Brixton Hill\_Lambeth Town Hall





Hondo Initial Proposal to LBL for a 23 storeys scheme

View 10 - Brixton Hill\_Baytree Road



# 23 Storeys

View 10 - Brixton Hill\_Baytree Road





# 20 Storeys

View 10 - Brixton Hill\_Baytree Road





# 18 Storeys

View 10 - Brixton Hill\_Baytree Road





# 16 Storeys

View 10 - Brixton Hill\_Baytree Road





# 14 Storeys

View 10 - Brixton Hill\_Baytree Road





**20 Storeys**  
View 26 - Electric Avenue East



**18 Storeys**  
View 26 - Electric Avenue East





End



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 November 2021 19:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Pope's Road

Hi [REDACTED]

Welcome back ! Yes don't worry about popes rd, I have the notification in hand (I hope). I have had various meetings with DP9 whilst you were away and don't need this week so pls continue to delete.

I am now not going to court as had to limit numbers so shall we have a quick catch up on Wednesday and can update you where we have got to on Popes and Manor Rd. Im free so pls find a slot.

Thanks  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 22 November 2021 18:29  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Pope's Road

Hi [REDACTED]

Hope all was ok while I was away. Looking at my inbox today, it looks like there was perhaps some forward motion on the consultation front. Any word from the Mayor's office on potential hearing dates?

Given that you have the MB court dates tomorrow and Wednesday, and I have nothing to report given that I've been on leave, might it be worth pushing our Wednesday morning Pope's Road meeting to Friday/next week? That would at least give us a chance to schedule a quick catchup beforehand. Happy to reach out to DP9 to reschedule/cancel – thoughts?

Best,  
[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**

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[REDACTED] [london.gov.uk](https://london.gov.uk)

My pronouns are: [REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 November 2021 20:26  
**To:** [REDACTED]  
**Subject:** FW: Planning Statement Addendum -  
**Attachments:** Planning Statement September Addendum November 2021 Final.docx; Appendix 2 (2).pdf; Appendix 1.pdf; Appendix 2 (1).pdf

FYI – I won't have much time to review and needs to be on website tomorrow afternoon so will have to run with it.

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 24 November 2021 20:20  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Subject:** Planning Statement Addendum -

Hi [REDACTED]

Please find attached planning statement and associated appendices.

I will PDF them all up tomorrow as one document send across.

If you have any queries please let me know.

Thanks

[REDACTED]  
Associate Director  
direct: 020 [REDACTED]  
mobile: [REDACTED]  
e-mail: [REDACTED]@dp9.co.uk

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[References to third parties in attachments - please see  
<https://www.blackseed.ventures/>  
and  
Brixton Village Youth Employment Programme  
and  
<https://www.ft.com/content/69717acc-7cd5-4c8a-bab4-b851e24874d6>]

[Redacted text]

[Redacted text]

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[Redacted text]

[Redacted text]

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[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

[Redacted text]

From: [Redacted] <[Redacted]@london.gov.uk>

Sent: 26 November 2021 12:40

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: FW: popes rd

FYI

I was meaning to suggest I just cover this for you given where we are on the Pope's programme now.

I've been in a pre-app all morning, but happy to have a brief 1:1 this pm if that suits?

[REDACTED]

[REDACTED]

---

From: [REDACTED] [REDACTED]

Sent: 26 November 2021 12:34

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: popes rd

Hi [REDACTED]

Noted thanks. [REDACTED] [REDACTED] [REDACTED]

I'll speak to her again this afternoon to confirm the above.

Thanks

[REDACTED]

---

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 26 November 2021 11:37

To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: popes rd

Hi [REDACTED]

Just caught up with [REDACTED] [REDACTED] [REDACTED] not much time to get popes rd report done. I have said to her she needs to spend next week not doing much else other than report writing. [REDACTED]. She pretty much has just over 2 weeks to get Popes Report nearly complete plus other workload which I understand to be 1 pre- app and 1 stage 1.

When she gets back it will be summarising any letters of reps and finishing design and planning balance sections. Over xmas I will make track changes to the report she has completed up to that point.

Any queries let me know.

Thanks

[REDACTED]

[REDACTED] [REDACTED]

Special Projects, Planning



[london.gov.uk](https://www.london.gov.uk)

[\[redacted\] london.gov.uk](https://www.london.gov.uk)

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From: [redacted]  
Sent: 12 November 2021 13:37  
To: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>; [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Subject: RE: popes rd

Hi both,

Do you have any time after TL's meet on Monday to discuss this issue, Lambeth decided it was a departure based on their tall building policy and site allocation but need to be careful due to similarities with D9. I need to get press notice out next Wednesday and be clear whether it's a departure or not. A second opinion would really assist.

[redacted] – also tad concerned about [redacted] having time to write this report [redacted]  
[redacted]  
[redacted]

Thanks

[redacted] [Regulation 12 (4)(e)]

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From: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Sent: 11 November 2021 10:22  
To: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Subject: RE: popes rd

Sure, fine by me.

---

From: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Sent: 11 November 2021 10:21  
To: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Subject: RE: popes rd

Thanks [redacted] yes LBL advertised as departure but little concerned that could undermine our views on D9. I will give it some further thought but maybe a meet between us and [redacted] early next week as need to decide whether we advertise as departure or not.

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From: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Sent: 11 November 2021 10:07  
To: [redacted] <[\[redacted\]@london.gov.uk](mailto:[redacted]@london.gov.uk)>  
Subject: RE: popes rd

Ah yes! We explored this with LBL at some length at pre-app stage. My memory is a bit hazy now, but I think it meets some of it, and other circumstances on the ground have changed meaning that certain preferred uses for this site have now fallen away.

To be honest I'm not sure whether it was advertised as a departure by LBL. Happy to catch up and see if we can piece it all together between us, but otherwise it might be best to just check in with LBL on these points. We have a very constructive working rapport with them thankfully.

From: [REDACTED] <[REDACTED]@london.gov.uk>  
Sent: 10 November 2021 19:17  
To: [REDACTED] <[REDACTED]@london.gov.uk>  
Subject: RE: popes rd

[Regulation 12 (4)(e)]

Preferred use	Improvements to Brixton Station to include a new station entrance and pedestrian links. Mixed-use development including retail, new workspace, food and drink, community, educational, leisure and recreation uses, possible market extension and associated uses. Development to include revitalised railway arches with options to provide links through to improve north-south routes.
Design principles and key development considerations	<p>Large site bounded by railway viaducts with considerable development potential subject to improving access and permeability through the site.</p> <p>The council will support development on the site that:</p> <ul style="list-style-type: none"><li>(i) provides opportunities to improve the station entrance and station facilities generally, including lift access and cycle parking;</li><li>(ii) provides public realm improvements to Brixton Station Road to include links to both the mainline and underground stations, the opening up of arches to provide links to north-south routes east of Popes Road and potential links to Brixton Village;</li><li>(iii) enhances the arches to provide active uses and routes through;</li><li>(iv) opens up Popes Road to provide a wider public space with the potential to provide improved and/or additional market spaces;</li><li>(v) includes market facilities;</li><li>(vi) includes environmental improvements to the viaduct arches serving the Orpington Line;</li><li>(vii) integrates and complements development on the Popes Road site (Site 15);</li><li>(viii) includes the re-provision of the redundant 1950s building;</li><li>(ix) avoids creating a canyon on either side of the railway viaducts;</li><li>(x) proposes low buildings to protect the amenity of new residential development on Coldharbour Lane adjoining the site.</li></ul>

[REDACTED]

[REDACTED]

[REDACTED]@uk

From: [REDACTED]  
Sent: 10 November 2021 19:12  
To: [REDACTED] <[REDACTED]@london.gov.uk>  
Subject: popes rd

Hi [REDACTED]

Im still learning the case but concerned we need to notify next week. Do you think this is a departure from policy ? bit concerned that LBS have but there are parallels with D9 on their reasons so need to be consistent.

<file:///C:/Users/Rigreen/Downloads/Committee%20report%202020-24%20Popes%20Road%20Coldharbour%202001347FUL.pdf>

happy to discuss if easier

Thanks

[REDACTED]

[REDACTED]

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 12 November 2021 13:54  
**To:** [REDACTED]  
**Subject:** Re: popes rd

[REDACTED]

You have sent an invite for when I'm in wider SMT. Please can you send another slot

Thanks

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** Friday, November 12, 2021 1:44:56 PM  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: popes rd

Ok, [REDACTED] diary looks pretty crazy mon and Tues so maybe we can discuss issues and report back etc. Will put a hold in diary for after TL.

Thanks

[REDACTED]

**Special Projects, Planning**  
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City Hall, The Queen's Walk, London SE1 2AA

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**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 12 November 2021 13:40  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Re: popes rd

I'm free but [REDACTED] is interviewing all Monday

[REDACTED] [REDACTED]

[REDACTED]

---

From: [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Sent: Friday, November 12, 2021 1:37:19 PM

To: [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: RE: popes rd

Hi both,

Do you have any time after TL's meet on Monday to discuss this issue,

[Remainder of email chain duplicated above]

\_\_\_\_\_

Thanks [REDACTED] I think we will have to go straight to notification as no time to resolve the other LP points now. Not sure where that will leave us but having not dealt with this site previously looks like we just need to get the consultation out.

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 16 November 2021 12:49  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Rd

Hi [REDACTED]

Sorry, still catching up with emails as I was interviewing most of yesterday.

It believe we touched on the need to ensure the scheme addressed new LP policy requirements as part of an early meeting with the applicant team that [REDACTED] attended. However, efforts since have very much focused on: i) exploring whether height could be reduced; and, ii) maximising the public benefits package. Essentially we saw these issues as the key ones to prioritise before getting into the more detailed points.

[Regulation 12 (4)(e)]

**From:** [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 15 November 2021 13:20  
**To:** [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Popes Rd

Hi both,

Was there any conversation with the applicant regarding changes required to the scheme since the publication of the LP like we did on other Stage 3s? Also im conscious that Environment Act adopted and I understand there are mandatory measures around Biodiversity which need to be considered but hopefully scheme already achieves that.

Thanks

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 November 2021 10:50  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Popes Rd

Hi [REDACTED]

Yes that is good with me.

Thanks  
[REDACTED]

[REDACTED] [REDACTED]  
**Special Projects, Planning**  
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City Hall, The Queen's Walk, London SE1 2AA

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**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 11 November 2021 10:46  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Cc:** [REDACTED]  
**Subject:** RE: Popes Rd

Hi [REDACTED]

Can we do 4.15pm for this meeting?

If so, I will send an invite.

Thanks  
[REDACTED]

[REDACTED] [REDACTED]  
Associate Director  
**direct:** 020 [REDACTED]  
**mobile:** [REDACTED]  
**e-mail:** [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

DP9 Ltd  
100 Pall Mall  
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**From:** [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

**Sent:** 10 November 2021 18:28

**To:** [REDACTED] [REDACTED] <[REDACTED][dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)>; [REDACTED] [REDACTED] <[REDACTED][dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)>

**Subject:** Popes Rd

Hi both,

Are you around for a quick chat tomorrow? I'm available anytime apart from 11 to 2pm and 3 to 4.

Kind Regards

[REDACTED]

[REDACTED] [REDACTED]

**Special Projects, Planning**

**GREATERLONDONAUTHORITY**

City Hall, The Queen's Walk, London SE1 2AA

**[london.gov.uk](http://london.gov.uk)**

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

NHS health information and advice about coronavirus can be found at [nhs.uk/coronavirus](https://nhs.uk/coronavirus)

The GLA stands against racism. Black Lives Matter.



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 05 November 2021 17:58  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Draft Press Notices  
**Attachments:** Draft Press Notice (Manor Road).docx; Draft Press Notice (Popes Road).docx

Hi [REDACTED]

Hope you had a great vacation.

Attached are draft press notices for Pope's Road and Manor Road, both amended from the Vinegar Yard press notice you sent over previously. As you'll see in the Pope's Road draft, the proposed amended benefits are still TBC.

I've reached out to [REDACTED] at Lambeth for the local publications to issue the notice in and have yet to hear back. I'm on leave here and there from Tuesday, so have told [REDACTED] that you or [REDACTED] may be following up with him.

Best,

[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**



## THE GREATER LONDON AUTHORITY

NOTICE UNDER THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 ("EIA Regulations") AND THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015 ('DMPO') AND THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE, LISTED BUILDINGS AND ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND) (CORONAVIRUS) (AMENDMENT) REGULATIONS 2020. NOTICE UNDER ARTICLE 25 OF THE EIA REGULATIONS

PROPOSED DEVELOPMENT AT: ~~20-24 POPE'S ROAD, SW9 8JBLAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD AND SNOWFIELDS~~

On ~~125 April~~ May 2019, planning application (reference ~~20/01347/FUL~~ 18/AP/4174) ('the Application') was submitted to the London Borough of ~~Southwark Lambeth~~ by ~~CIT Group Hondo Enterprises~~ ('the Applicant') for the following development. The Application was accompanied by an Environmental Statement in accordance with the EIA Regulations.

On ~~124 August~~ March 2020, the ~~Deputy Mayor of London~~ for Planning, Regeneration & Skills, acting under delegated authority, issued a direction under Article 7 of the Town and Country Planning (Mayor of London) Order 2008 that the Mayor will act as the Local Planning Authority for the purposes of determining the Application. Subsequent to that direction, the Applicant has submitted ~~revisions to the Application~~ to the Mayor ~~revisions to the Application~~, with amendments to plans and planning documents including:

- Extending the term of the Affordable Workspace to 2090
- Establishing a new GLA Brixton job training fund of £1,000,000 (£40,000 per annum for a period of 25 years)
- In addition to the number of apprenticeships already agreed, the applicant would provide an additional 50% for apprenticeship opportunities during the occupation stage.
- Providing 12,754 sq.m. of dual-use office/medical floorspace and reducing office floorspace from 24,120 sq.m. to 9,297 sq.m.
- Increasing the affordable workspace from 1,200 sq.m. to 2,934 sq.m.
- Retention of the existing warehouse to accommodate community space and cafe
- Removal of the music venue and subsequent reconfiguration of the proposed building and public realm, providing 187 sq.m. of public garden space
- Revising the overall height of the building from 86.7m AOD to 97.14m AOD, to facilitate the increased floor to ceiling heights required to accommodate medical uses

The proposed development ~~is remains~~ new described as follows:

*"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. Redevelopment of the site to include the demolition of existing buildings, retention and refurbishment of the warehouse and the erection of a ground, mezzanine and 18 storey building (with plant at roof level and 3 basement levels) comprising of café and community space within the warehouse and flexible retail, affordable workspace and flexible office and medical floorspace within the new building, cycle and disabled car parking, servicing, refuse and plant areas, public garden (including soft and hard landscaping), highway improvements and all other associated works."*

The Applicant has also submitted other information under Regulation 25 of the EIA Regulations in relation to the Environmental Statement which accompanied the Application. This is available to view at: [www.XXX.com](http://www.XXX.com). To request a copy of the Environmental Statement, please contact [XXX.XXX@XXX.com](mailto:XXX.XXX@XXX.com). Revisions and information are available at:

- London Borough of ~~Southwark Lambeth~~ website at: <https://planning.lambeth.gov.uk/online-applications/simpleSearchResults.do?action=firstPagehttps://ldopa-westminster.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PR14SHRP2NK00> (using ref: 20/01347/FUL 18/AP/4174).
- GLA website at: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/poppe-road-public-hearing> <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/vinegar-yard-public-hearing> (using GLA ref: 2021/02656665)

Hard copies of documents are not available to view and representations by post are discouraged, in line with Town and Country Planning (Coronavirus) Regulations 2020. Representations about the revisions to the Application and/or the other information should be emailed to the GLA at [VinegarYard@london.gov.uk](mailto:VinegarYard@london.gov.uk) made via the website listed above. Any representations must be received by the GLA by ~~12.00pm~~ (TBC based on 12.00pm). The Application will not be decided before the consultation period ends. Comments

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received after the date referred to above, but before a decision is made, may still be taken into account but failure to meet this deadline could result in your comments not being considered.

DRAFT



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 04 November 2021 10:43  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Pope's Road

Hi [REDACTED]

Yes I was, however it might be one that we take back to the UD team to find resources for.

I've looped [REDACTED] into the conversation. Are there any rough timeframes for when you need UD input?

Cheers,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 03 November 2021 13:46  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road

Hi [REDACTED]

Hope all's well.

I'm just working on the PPA for Pope's Road at the moment. [REDACTED] mentions below that you were previously involved as the design officer on Pope's Road. True?

While there haven't been any design changes proposed as yet, given that design and heritage are important parts of the planning balance with this one we will need a design officer on board. Is this something you'll be able to pick up or should I go back to [REDACTED] for a plan B of sorts?

Best,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 26 October 2021 15:57  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road

Hi [REDACTED]

[REDACTED]

Been meaning to ask about Popes Rd actually and whether you needed any UD input for the stage 3. Understand [REDACTED] has been involved previously through pre-app etc?

Thanks  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 26 October 2021 13:46



To: [REDACTED]@london.gov.uk>

Subject: Pope's Road

Hi [REDACTED]

[REDACTED]

On Pope's Road, any idea who will step in as the design officer following your departure?

Best,

[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**



[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 02 November 2021 16:40  
**To:** [REDACTED]  
**Subject:** Missed Call

Hi [REDACTED]

I'm just finishing a meeting - can I can you in circa 15 minutes?

Thanks  
[REDACTED]

[REDACTED]  
Associate Director  
direct: 020 [REDACTED]  
mobile: [REDACTED]  
e-mail: [REDACTED]@dp9.co.uk

**DP9 Ltd**

100 Pall Mall

London

SW1Y 5NQ

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 26 October 2021 11:59  
**To:** [REDACTED]  
**Subject:** Popes Road update

Hi

Please could one of you give me a call today to discuss Popes Road. The applicant team have contacted me today asking for an update on progress

Many thanks

[REDACTED]

[REDACTED]

[REDACTED] **Planning**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA



## 20-24 POPES ROAD (GLA Stage 3 ref: 2021/0265)

Written representation submitted by:



### **HERITAGE HARM**

#### **1. Statutory Listed Buildings**

There are 11 Statutory Listed Buildings in Brixton Town Centre within close proximity to the application site.

St Matthews Church (Grade II\*)  
Lambeth Town Hall (Grade II)  
Tate Library (Grade II)  
Ritzy Cinema (Grade II)  
Budd Monument (Grade II)

Brixton Recreation Centre (Grade II)  
Granville Arcade /Brixton Village (Grade II)  
Reliance Arcade (Grade II)  
Market Row (Grade II)  
Brixton Fire Station (Grade II)  
The Sculpture on Brixton Station (Grade II)

These are all **public buildings** or monuments.

Lambeth Local Plan (LLP) 2021 policy Q20 (Statutory Listed Buildings) states that:

*Development affecting listed buildings will be supported where it would:*

- i. conserve and **not harm** the significance/special interest;*
- ii. not harm the significance/**setting (including views to and from)**;*
- iii. not diminish its ability to remain viable in use in the long term;*
- iv. is **justified** and supported by a robust Heritage Statement.*

and adds at para 10.96 'In line with NPPF **any** proposed harm to significance will require a clear and convincing justification.'

NPPF2021 para 200 states that:

*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) **grade II listed buildings**, or grade II registered parks or gardens, **should be exceptional**;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, **grade I and II\* listed buildings**, grade I and II\* registered parks and gardens, and World Heritage Sites, should be **wholly exceptional**.*

In the Lambeth officers report, the first 5 of these listed buildings are included in Table 3, where it states that **the resulting harm in each case would be contrary to [LLP2015 policy] Q20(ii)**. The remaining 5 listed buildings were not originally identified or considered by Lambeth officers, but by the time of the 2nd PAC meeting, officer assessments concluded no harm in each case.

In particular the Brixton Recreation Centre, which is located adjacent to the application site, was assessed as follows:

9.2.14 Brixton Recreation Centre is a large post-war complex designed by George Finch of Lambeth's in-house architects department. It was completed in the 1980s and is Grade II listed. Its architectural interest lies both internally and externally. The proposal will be located diagonally opposite the SE corner of the Recreation centre on the other side of the railway viaduct. This siting means that the proposal does not intrude into the immediate setting (foreground) of the recreation ground from outside the REC either on Popes Road or on Brixton Station Road.

9.2.15 The proposal will be visible in wider townscape views shared with the REC – such as the view down Brixton Station Road from Brixton Road but the view of the REC is an oblique one and the proposal sufficiently separate that no harm results. In views from Atlantic Road / Vining Street junction (applicant's view 23) the proposal will partially block a view of the REC's roofline. However, this is not a particularly good view of the REC and has not been identified in the Brixton Conservation Area Statement as a view of merit. Similarly, in the oblique view down Popes Road from the north (applicant's view 22) the effect is not harmful. On balance it is considered that the proposal will have a **neutral effect on the setting of the REC. No harm will result.**

This demonstrates a misinterpretation of policy Q20(ii) because views from the Brixton Recreation Centre were not considered and as set out in the glossary of NPPF2021, the setting of a heritage asset is defined as 'The surroundings in which a heritage asset is experienced.'

In relation to views both to and from the Brixton Recreation Centre, View 19 provided in the applicant's Townscape, Heritage and Visual Impact Assessment (THVIA) report is shown below. Given the proximity between the two buildings and the resulting overwhelming visual dominance of the tower over the Brixton Recreation Centre (seen on the left in red brick), it is astonishing that Lambeth planning officers concluded that the development would cause no harm to its significance or setting.



Not only would the excessive height of the tower cause harm with regard to views to and from Brixton Recreation Centre, harm would also be caused because this public building relies heavily on overhead natural daylight and sunlight. These harms were not considered by Lambeth planning officers or the applicants.

Historic England's reasons for designation of Brixton Recreation Centre include mention of these daylight spaces (emphases added):

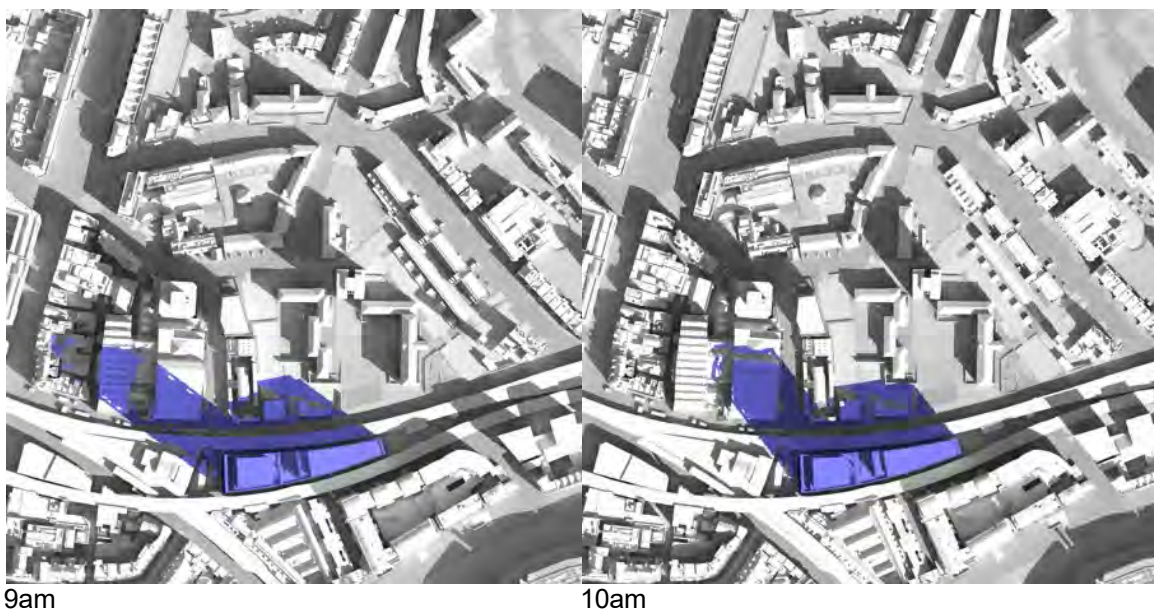
*Interiors: the **atrium and pool hall** are dynamic, dramatic and sculptural spaces which optimise **natural light**..... one of the earliest leisure centres to combine an extensive range of activity areas with leisure facilities intricately planned around a **dynamic, top-lit circulation space***

The aerial view image below shows the extent to which the Brixton Recreation Centre relies on overhead natural daylight via glazed roof openings.





Extracts from the applicant's sunlight and daylight report below demonstrate the extent to which sunlight to the Brixton Recreation Centre would be blocked by the development. They show the impact at 9am and 10am on 21st March.



Granville Arcade/Brixton Village is also a Grade II listed public building immediately adjacent to the application site which, being bounded on its flanks, relies heavily on overhead daylight and sunlight. Historic England's reasons for designation of the Granville Arcade/Brixton Village include reference to these daylit spaces:



... the **open glazed** and curved steel truss **roof structure** of Granville Arcade (Brixton Village) **impressively lights the shopping avenues inside**, the plan of which are of particular interest at Granville....

The aerial view image below shows the extent to which Granville Arcade/Brixton Village relies on overhead natural daylight via its glazed roof.



Harm to this statutory listed public building was not acknowledged by Lambeth Officers or the applicants.

Even without taking into consideration the clear physical amenity harm caused to these 2 listed buildings immediately adjacent to the application site, the Lambeth officers report identifies harm to 5 other listed buildings without justification.

The application is therefore without question contrary to LLP policy Q20.

## **2. Registered Parks and Gardens**

Brockwell Park is a Registered Park in the vicinity of the application site and contains a Grade II\* listed mansion and a Grade II listed Lido.

LLP2021 policy Q21 states that:

*Development proposals affecting parks and gardens on the national register will be supported where they:*

- i. sustain and enhance the significance of landscape and its features of interest (including structures);*
- ii. take opportunities to restore original features or do not compromise future restoration opportunities;*



- iii. promote greater accessibility;
- iv. **preserve the setting (including views in and out);**
- v. are justified and supported by robust Heritage Statements.

Table 3 of the Lambeth officers report states that **the resulting harm to Brockwell Park would be contrary to [LLP2015 policy] Q21(iv)**

No justification for this harm was provided by the applicant.

### **3. Conservation Areas**

The application site is bounded by two Conservation Areas --Brixton Conservation Area (CA26) and Loughborough Park Conservation Area (CA27). Brockwell Park Conservation Area (CA39), Trinity Gardens (CA18) and Rush Common and Brixton Hill Conservation Area (CA49) are also nearby.

LLP2021 Policy Q22 (Conservation Areas) states that:

*A. Development proposals affecting conservation areas will be permitted **where they preserve or enhance the character or appearance of conservation areas** by:*

- i. respecting and reinforcing the established, positive characteristics of the area in terms of the building line, siting, design, height, forms, materials joinery, window detailing etc;*
- ii. protecting the **setting (including views in and out of the area)**.*

Table 3 of the Lambeth officers report states that **the resulting harm to Brixton, Brockwell Park and Trinity Gardens Conservation Areas would be contrary to [LLP policy] Q22(a) (ii).**

Table 3 states that the application would result in 'no harm' to the adjacent Loughborough Park Conservation Area. The THVIA report provided by the applicant only contains one view taken from within the Loughborough Park Conservation Area, which is View 3. This is taken from the Loughborough Junction end of Coldharbour Lane over half a mile away --virtually as far away from the site as is possible to be while still remaining in the Conservation Area. If this was the only view that Lambeth planning officers used to assess impact, then it might not be surprising that they came to a conclusion of no harm.

However, the finding of no harm in Table 3 is at odds with para 8.2.100 of the officers report which assesses a slightly different view from a point at the junction of Coldharbour Lane and Moorland Road. Although this view was not provided in the officers report, it is in fact Image 29 of the Design and Conservation report 13 Oct 2020. In relation to this view it states that *'The effect is negative on the setting and would result in **less than substantial harm**.'*

Table 3 of the officers report does not mention Rush Common and Brixton Hill CA, but in the text harm to this Conservation Area is identified at para 8.2.107.

Harm to 5 Conservation Areas is therefore evidenced.

Examples of the harm caused to the Brixton Conservation Area in particular is evidenced in the Lambeth officers report as follows:

*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**.*

8.2.82 The following views are within the part of the conservation area north of the junction with Brixton Hill / Brixton Road and Acre Lane / Coldharbour Lane. The townscape here is generally more intimate and enclosed. **Again, the character is that of a low-rise historic urban environment with no single building playing a dominant role in townscape terms. This is a key characteristic of the conservation area.** The viewer is moving closer to the application site and given the intimacy of the townscape there will be location where the proposal is screened by foreground buildings. However, given its scale, there will be other instances where it appears over the top of existing buildings and in townscape gaps. Whether or not the effect is adverse comes down to the degree of the effect.

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.

Historic England have objected to the application. A full version of their objection letter of 18 May 2020 was not published until after the decision had been taken by the Lambeth PAC to approve the application. This objection letter was also not contained in the list of documents submitted to the GLA in either of the Stage 2 referrals. Extracts from this letter were included in the officers report , but they fail to convey the magnitude of Historic England's concerns.

In that letter Historic England said in relation to Brixton Conservation Area that (emphases added):

*We consider that several of the verified views in the submitted (THVIA) demonstrate that there would be a **significant harmful visual impact on the [Brixton] Conservation Area.** Secondary to this, there would also be harm to the setting of the Church of St Matthew.*

*The selected views which best illustrate, but are not limited to, the adverse impact on the Conservation Area are 19, 23 and 26. These static, snapshots show a **monumental change to the horizon which would represent a transformative change to the way that the area would be experienced in true, kinetic views.** They show that the proposed development would have an **aggressively dominant relationship with the existing low rise townscape and its positive features.** As the scale is so much greater than the prevalent 3--4storey historic buildings, these would no longer be the focus.*

*View 26 shows **Electric Avenue**, one of Brixton's main set pieces or elements of formal townscape; it was designed to be a prominent shopping destination. The proposals would have a very **distracting presence, in effect becoming the main focal point at the expense of Brixton's famous market street.** Presently, the sightline out of the Conservation Area is terminated by the railway bridges, another important feature as noted above. Due to their comparatively low height, the bridges serve to emphasise the height and grandeur of the historic buildings. **Both become lost against the back drop of the proposals,** further undermining the way in which the way the historic development of the area is experienced.*

*Through dramatically breaking the scale established townscape, the **harm to the setting of the Conservation Area is considered to be at a moderate-high level.** Under the terms of the NPPF, this harm is 'less than substantial', and **in our view represents an unacceptable impact.** Throughout Lambeth's planning policies and supporting evidence there is a recognition that views from the south are highly sensitive and modelling has been undertaken*



to determine appropriate impacts and avoid harm. The site is not identified as suitable for a tall building, yet the proposals far exceed the height parameters for the adjacent, less sensitive site, on Brixton Station Road by 30metres – approximately a third.

It is difficult to see that the design quality could represent mitigation for this **significant adverse impact**, particularly given that it is the scale and massing which are its inherent flaws. The proposal would act as a landmark, but this in itself does not convey either a positive or negative impact in place-making. **We suggest that the development would markedly detract from the strong sense of place that Brixton already has. We cannot agree that the impact would be positive** and that the proposed building 'will clearly belong to the particular urban character of central Brixton'- as advanced by the applicant. For example, the flank elevations have a warehouse-like quality owing to the repetitious windows with squat proportions, which combined with the brick facing material and concrete lintels give it a very functional character. Whilst this may represent a successful interpretation in some of London's historically industrial areas, it has no particular resonance with Brixton's building stock, which generally features more celebratory, polite commercial buildings and very few prominent industrial buildings. In this respect, **we do not see that it could be said to reinforce local distinctiveness or draw upon local history.** The double height upper floors of the front elevation exacerbate the impact, giving emphasis to the tallest part of the building by making it proportionally dominant.

The appearance of the development behind St Matthew's Church, as illustrated in THVIA views 10 & 11, is considered to diminish its presence as an important civic building, and distracts from its roofline. These are a key element of its significance and presently the roofline and west end portico are framed against the sky. The proposed development would interrupt this, acting as a distracting feature which diminishes one's ability to appreciate the architectural qualities of the church from the south. However, since better views of the church would remain uninterrupted, this harm is considered to be low-moderate.

The Victorian Society also objected to the application. Their letter of objection written on 26 May 2020 was not mentioned in the officers report, but a redacted version of its text was sent to the GLA when it considered the Stage 2 referral for the second time. It said (emphases added):

*The area of Brixton that is now designated as the conservation area has managed to avoid the intensive development which has blighted many other historic urban centres, and therefore retains its character as a predominantly Victorian town centre with later Edwardian and inter-war additions. The general sympathetic scale of development both in the last century and this, is a key factor behind the continued legibility of this character, and it is crucial that this sense of scale is maintained going forward.*

*The proposal to construct a part 4, part 9, part 20-storey building in the setting of this area is therefore alarming and demonstrates a total failure to understand and respond to the context of the area. Whilst buildings of this height may be appropriate elsewhere in London, it is clear to see that this is not a location where this applies. The proposed would plainly overshadow the surrounding buildings, not only along Electric Avenue, but also Brixton Road, the main thoroughfare and key focal point, and thus cause significant harm to the conservation area. The potential impact of this is clearly demonstrated through the 'Townscape, Heritage and Visual Impact Assessments' included within the application which shows several key buildings in the shadow of the 20-storey section of the building.*

*There is moreover a further danger that in granting consent to a scheme such as this, a precedent could be set for further tall buildings on the perimeter of the conservation area which would overshadow the existing, and, in time, completely erode its special character.*

*It is important that the historical and characterful significance of Brixton Conservation Area, as well as its setting, is protected so that it may retain its individuality as an urban centre. The proposed fails to do this, treating the area as another geographically convenient area for intensive development, and we therefore urge your authority to refuse consent.*

The minutes of the Design Review Panel meeting on 18 Feb 2022 record their views as follows:

*2.10 The proposed height and mass is considered **unacceptably assertive** and **unacceptable in terms of local townscape and heritage impact**.*

It is clear from Historic England and The Victorian Society's objections and the Design Review Panel's assessment that they regard the harm that would be caused by the development to the Brixton Conservation Area based on visual assessments to be **'moderate to high', 'significant' and 'unacceptable'**.

However, as the NPPG makes clear, visual assessments are not the only criteria on which to base an assessment of heritage harm.

NPPG para 18a-006 considers what constitutes 'significance' (emphasis added):

*'Significance' in terms of heritage--related planning policy is defined in the Glossary of the NPPF as **the value of a heritage asset to this and future generations because of its heritage interest**. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

*The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, **architectural**, artistic or **historic**. This can be interpreted as follows:*

- *archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *architectural and artistic interest: These are interests in the design and **general aesthetics of a place**. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.*
- *historic interest: An interest in past lives and events (including pre--historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide **meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity**.*

It would appear that Lambeth only considered harm in relation to the views provided by the applicant in its THVIA report, rather than considering harm to the significance of Brixton Conservation Area in the context of the NPPG/NPPF definitions and guidance and the description of significance contained in the Conservation Area statement.

The Brixton Conservation Area Statement (2012) describes its significance as follows (emphases added):

*2.1 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**. Brixton is also a vibrant town centre. Aside from its characterful built environment **the covered arcades and street markets are its unique feature**; these numerous local independent market traders are supplemented by independent stores, chain stores and other associated town centre uses.*

*2.19 In the late 1940s an influx of new residents from the West Indies and subsequently others from all around the world has given Brixton the vibrant multicultural character that it is now known for throughout the world. These new residents have brought with them food, music and culture that has ensured the continuing popularity of the markets.*



**2.76 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.**

**2.77 The shopping arcades / covered markets make an exceptional contribution to Brixton's character and appearance. All three share common characteristics of a double- height top-lit arcade onto which open modest retail units. Brixton is unusual for having three 1920s and 1930s arcades erected for the 'bargain' market retailer and providing a network of inter-connected markets across the town centre; the Council is not aware of any other place in Britain which exhibits such a close network of covered markets / arcades.**

**2.87 Views of roofscape and streetscape from trains travelling along the elevated railway viaducts and from the platforms of Brixton Station. Of particular note is the views down Electric Avenue and towards Brixton Road.**

**2.92 ..... The area requires careful nurturing and management to ensure that increased investment and redevelopment does not drive out the people and uses that give Brixton its rich character – the multicultural markets and their inexpensive goods and the evening economy that makes Brixton so interesting and vibrant.**

**2.93 Brixton should not be sanitised or comprehensively altered; regeneration through investment in the existing buildings, exciting new buildings which respond well to their context and new uses that reinforce the established character and uses will do much to retain its individuality and interest.**

**3.26 '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.**

These extracts underline the importance of **people and places** to the significance of the Brixton Conservation Area--what makes it distinctive and unique, and how the markets are culturally and economically important.

The NPPG goes on to say at para 18a-018 that (emphases added):

**Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.**

The proposed development would directly threaten the BCA's distinctiveness as exemplified by the network of indoor and outdoor markets, the small businesses that operate from within them and the people that as the Conservation Area statements says 'gives Brixton its rich character'

The office space in the development targets the Creative and Digital Industries. Only 15% of these jobs are forecast to go to Lambeth residents, let alone Brixton residents despite Coldharbour ward being one of the two most deprived wards in Lambeth. This would drastically change the demography

of the town centre. As many local residents have expressed in their objections, this development would change the face of Brixton irrevocably and would constitute another step towards the gentrification of Brixton.

NPPG para 013 states that (emphases added)

*'When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that **developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation***

The proposed indoor shopping area in the development on the first and second floors would directly compete for custom with the existing indoor and street market traders and therefore threaten the economic viability of the markets that contribute so much to the significance of the Conservation Area.

So not only would the development be physically out of scale and out of character with the built environment of Brixton, it would be at odds with the neighbourhood's cultural heritage which not only gives it its identity but is an integral part of the Conservation Area's designation and description of its significance.

The developer's intention is to create a new public square in front of the building. Despite this not forming part of the application itself (lying outside of the applicate site) it is nonetheless listed as a public benefit. If realised this square would shift the focus of Brixton's public realm and detract from and undermine the symbolic importance of Windrush square to the neighbourhood's afro-caribbean community .

As 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, said in her objection:

*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.***

These adverse impacts to key elements of Brixton Conservation Area's special architectural and historic interest cannot be regarded as anything short of serious and therefore I urge the Mayor to conclude that under the NPPG and NPPF tests, the harm to its significance is indeed **substantial**.

#### **4. Non--Designated Heritage Assets/ Local Heritage List**

LLP2021 policy Q23 part C states that:

*The council will: i. resist the destruction of assets on the local heritage list (**or harm to their settings**) and expect applicants to retain, preserve, protect, safeguard and, where desirable, enhance them when developing proposals that affect them*

Table 3 of the Lambeth officers report lists 23 Non-Designated Heritage Assets harmed by the application. These are:

Nos. 54-56 Atlantic Rd  
Nos.467-469 Brixton Rd  
Nos. 518 to 522 Brixton Rd  
Nos. 31--43 Electric Ave  
Nos. 28 – 38 Electric Ave  
Nos. 60-64 Trinity Gardens



It states that **the resulting harm to their settings in each case would be contrary to [LLP2015 policy] Q23(b) (iii).**

Neither Table 3 nor the Lambeth officers report in general mentions Walton Lodge in relation to policy Q3, which is a locally listed building immediately adjacent to the application site, within the Brixton Conservation Area and on the boundary with the Loughborough Park Conservation Area. This building used to be the Sanitary Steam Laundry but was recently converted into flats with a restaurant on the ground floor. Sunlight and Daylight assessments carried out by the applicant evidence that 16 windows in this building would suffer from daylight loss in excess of the levels recommended in BRE guidelines on sunlight and daylight. This gives a clear indication that views to the north from this building (which would be only 13m away) would be totally obscured by the development and would harm its setting.

According to the Brixton Conservation Statement (2012) there are also several more Non-Designated Heritage Assets in the vicinity of the application site that the Lambeth officers report fails to mention and therefore presumably has not considered as many of these are closer to the application site than those listed at Table 3. These are:

Former Railway Hotel, Atlantic Road  
28 Atlantic Road  
Dog Star PH, 389 Atlantic Road  
Former David Greig store, 54 --58 Atlantic Road  
Electric Brixton, Town Hall Parade Brixton Hill  
Bust of Henry Tate, Brixton Oval  
Brixton Theatre Foundation Stone, Brixton Oval  
Former Coach and Horses PH, 443 Coldharbour Lane  
Former Synagogue, 49 Effra Road 22/03/2010  
3, 19 -29 Electric Avenue 22/03/2010  
45, 47 Electric Avenue 22/03/2010  
2, 14 --16 Electric Avenue 22/03/2010  
18 --26 Electric Avenue  
425 – 433 Coldharbour Lane (including Clifton Mansions) 26/03/2012  
Carlton Mansions (flats 2-16), Coldharbour Lane 26/03/2012  
47 Effra Road 26/03/2012

It was negligent of the Lambeth planning officers to omit to consider or report on the harm caused to these locally listed buildings.

It is notable that 41 Non-Designated Heritage Assets are on Electric Avenue and that Lambeth identified harm to all 13 that they assessed on this street.

## **5. Heritage Assets**

All of the statutory listed and locally listed buildings, parks and Conservation Areas considered in the above sections are Heritage Assets and the officers report evidences harm to 33 of the 37 considered--contrary to LLP policies.

In addition, London Plan 2021 (LP2021) policy HC1 states that:

*C Development proposals affecting heritage assets, **and their settings**, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. **Development proposals should avoid harm** and identify enhancement opportunities by integrating heritage considerations early on in the design process*

The proposed development is therefore clearly in breach of LP2021 policy HC1.

## **Conclusion**

As demonstrated by the Lambeth officers assessment, harm is identified to

- 1 Grade II\* listed building
- 4 Grade II listed buildings
- 23 Non-Designated Heritage Assets
- 1 Registered Park
- 5 conservation Areas

No justification for the harm to these heritage assets was provided by the applicant. This is evidenced at para 5.172 of the Design and Conservation Report 13 Oct 2020 where it says:

*The applicant's planning statement addendum appears to **maintain that there is no heritage harm and therefore no justification is required.** Given that both we and Historic England identify harm we seem to have come to a head given that Para 194 of the NPPF requires a clear and convincing justification for harm. **The applicant's denial of any harm is a convenient means of side-stepping the requirement for justification** but it puts the decision maker in a difficult position if they reach a conclusion that harm results as there is no justification to help them. **It is our reading of the NPPF that it is only after accepting the justification for harm that the public benefits should be considered.** You may wish to get a view from legal on this matter.*

In addition, no heritage benefits are identified.

There is clear evidence that the proposed development breaches Lambeth Local Plan policies Q20, Q21, Q22 and Q23 and London Plan policy HC1. It also calls into question whether public benefits can be weighed against harm where no justification is provided.

There are errors and omissions in the evidence presented to Lambeth PAC, Historic England and the GLA and it would appear that Lambeth planning officers only considered harm in relation to the views provided by the applicant in its THVIA report, rather than considering harm to the significance of those heritage assets in the context of the NPPG/NPPF definitions and guidance.

At para 8.2.44 of the Lambeth officers report it states that:

*Where more than one heritage asset would be harmed by the proposed development, the decisionmaker also needs to ensure that when the balancing exercise is undertaken, the cumulative effect of those several harms to individual assets is properly considered. Considerable importance and weight must be attached to each of the harms identified and to their cumulative effect.*

The widespread, unjustified harm to the numerous heritage assets within the Brixton Conservation Area and the fact that under NPPG guidelines the adverse impact on the Conservation Area itself would seriously affect key elements of its special architectural and historic interest, would suggest the level of harm to be **substantial**. I urge the Mayor to conclude that substantial harm would result from the development and when considered in relation to other harms identified, certainly sufficient to outweigh the purported public benefits.

[REDACTED]

27th Oct 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

[REDACTED]

[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.
- [REDACTED], 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 [REDACTED] 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

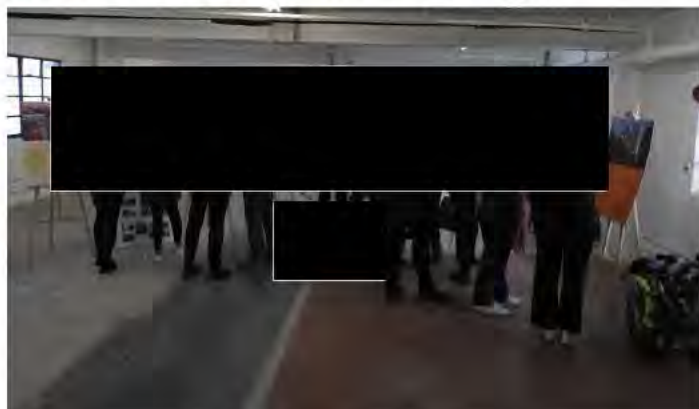


Figure 7: 1 February 2020 public exhibition in Brixton Village

### 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%**)

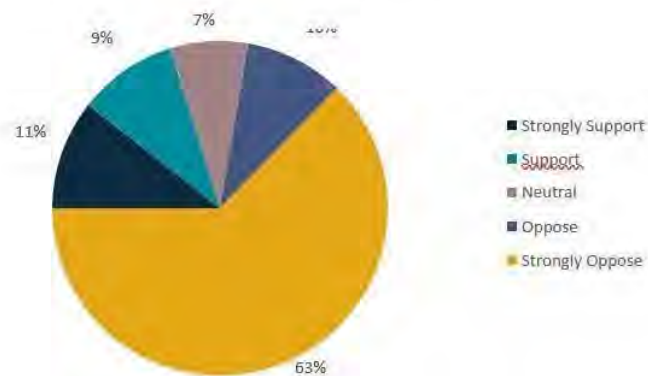


3. ***Do you support the need for a taller landmark building to address the distinct lack of office space, including affordable workspace in Brixton, which is significantly lower than the rest of London?***

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.

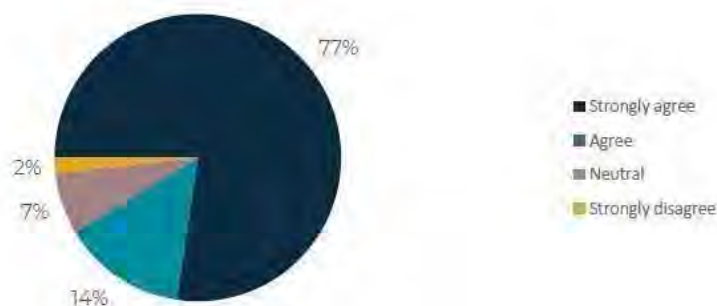
**30 | Statement of Community Involvement – Pope's Road  
SW9 7PR**

**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

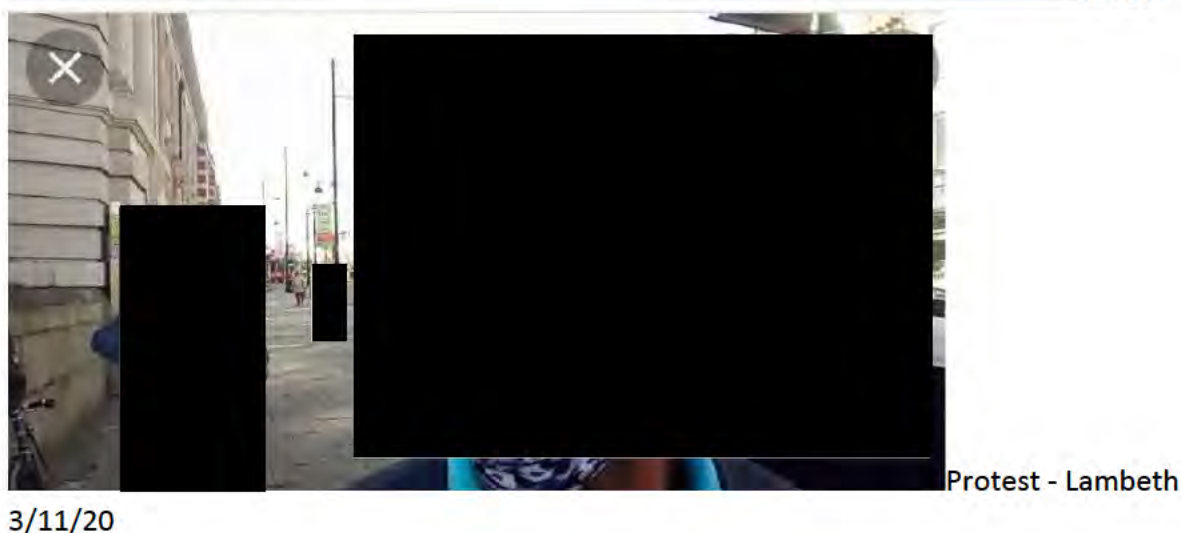
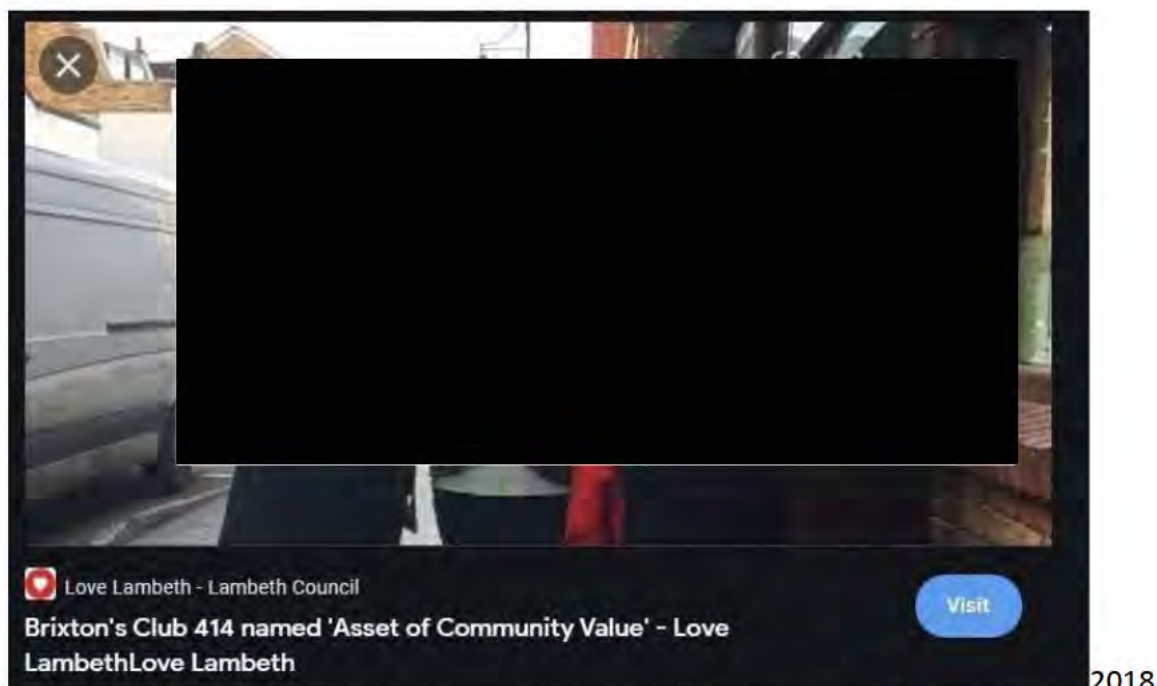
#### 4.2 The 414 Club

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.

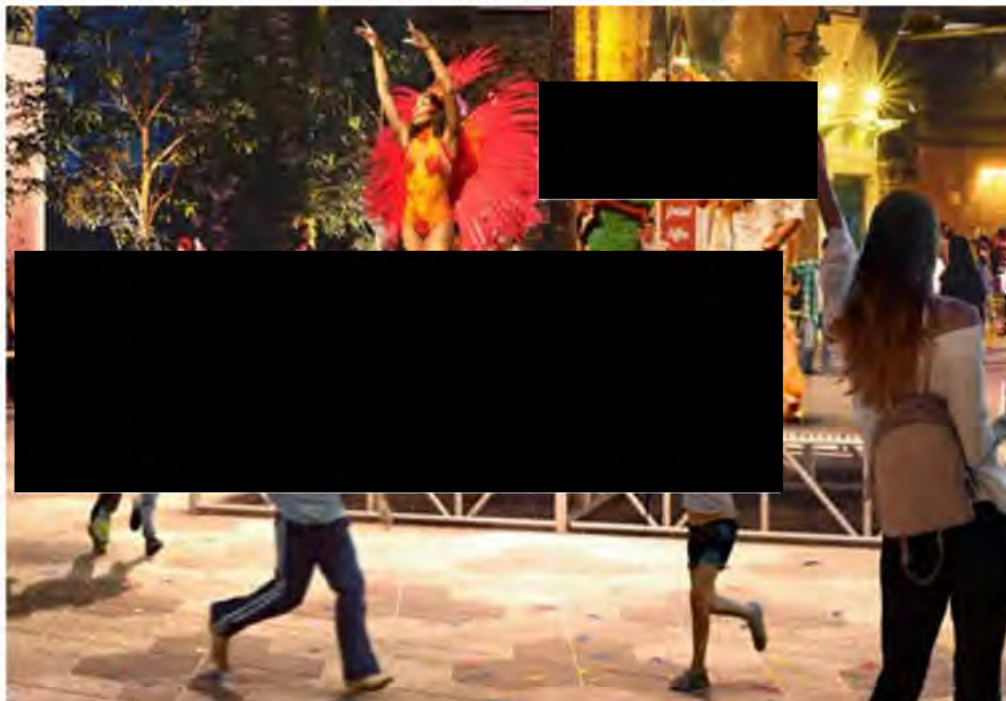
We have argued there has been a lack of community consent and engagement here. These artists' impressions of 'community', 'heritage' and 'diversity' appear to have been bolted, or 'photoshopped' onto the existing plans, without any real understanding of whether or not the real people affected by the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

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

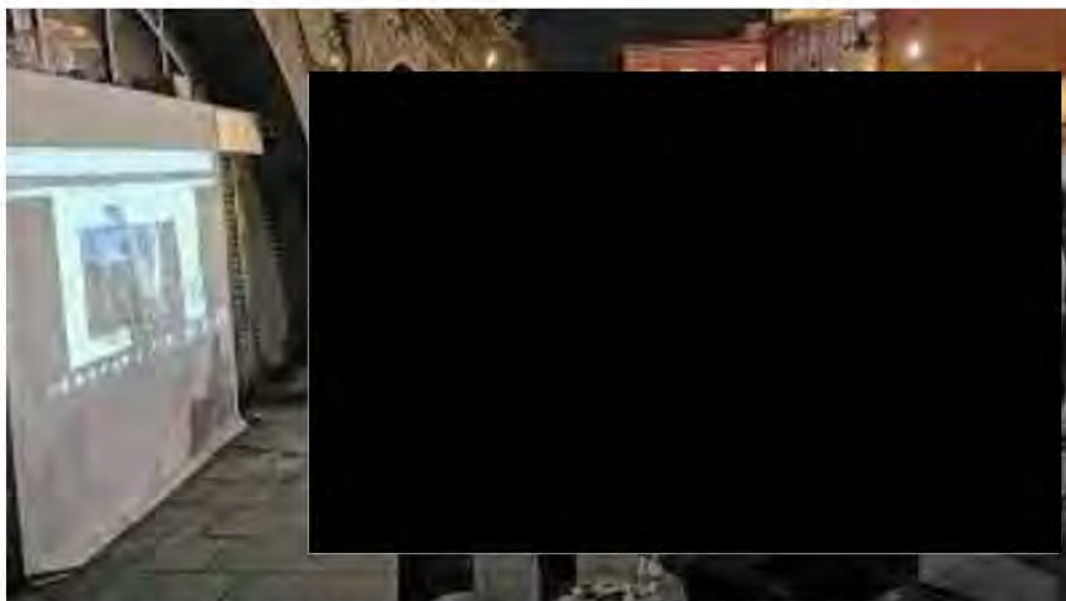




And here's the all-sunny, fun packed space outside on Pope's Road, where young children can run free  
parping saxophones, and where beautiful trees and bushes grow simply *everywhere*.



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. This cannot  
go ahead!!*

Best,  
The People of Brixton

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 Pde'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]

Written Representation Submitted by:

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

### Hondo Tower and the Climate Crisis

This report constitutes a detailed examination of the Hondo Tower's sustainability commitments, based on London and Lambeth plan policies. It includes the conclusions of a Whole Life Cycle (WLC) Carbon Assessment of the development, and analysis of the Energy and Sustainability Statements prepared by Hurley Palmer Flatt, on behalf of Hondo Enterprises, and submitted to the Lambeth Planning Applications Committee (PAC).

#### I) Carbon Assessment Requirement

For this development, Hondo Enterprises is yet to produce a Whole Life-Cycle Carbon Assessment, which is required under **Policy SI 2 F** of the London Plan:

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

Moreover, **Policy SI 2 E** adds:

***"Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions."***

Neither of these policies were taken into account by the developer in its planning application - despite the fact that Whole Life-Cycle Carbon Assessments were included in drafts of the London Plan from August 2018.

#### II) Environmental significance Whole Life Cycle (WLC) Assessments

Clause 9.2.1 of the London Plan adds that approximately **78% of London's greenhouse gas emissions come from London's homes and workplaces**. The carbon emissions of buildings are broken down into two distinct components. **Operational carbon** refers to the carbon emitted in running a building - heating, lighting, ventilation, cooling. **Embodied carbon**, on the other hand, focuses on the carbon emitted during construction itself. As the GLA's guidance on WLC assessment states, embodied emissions refer to:

***"those associated with raw material extraction, manufacture and transport of building materials, construction and the emissions associated with maintenance, repair and replacement as well as dismantling, demolition and eventual material disposal."***

Embodied carbon covers 30-50% of the total carbon footprint of a building - with operational carbon covering the rest. Moreover, embodied emissions are the first emissions of a building: once the building is in operation, the overwhelming majority of a building's embodied carbon has already



been emitted. The operational carbon benefits that a building can bring through solar panels, mechanical ventilation, and heat pumps are effectively trying to offset the embodied carbon already emitted.

Embodied carbon therefore constitutes the most immediate component of a building's carbon footprint, and should therefore be comprehensively analysed by the GLA to comply with its December 2018 Climate Emergency Declaration.

### **III) Scrutiny at Planning stage**

In the November 2020 Planning Application Committee hearing, Cllr. Rebecca Thackray scrutinised the developer over their lack of transparency regarding the building's carbon emissions. At the hearing, [REDACTED] a Director at DP9, one of the developer's planning consultants, stated that a pre-application whole life cycle assessment had been conducted. This is inaccurate: the developer's sustainability statement, written by Hurley Palmer Flatt, states, pages 41 and 42:

***"A Life Cycle Assessment will be produced for the Proposed Development at RIBA stage 1 to reduce the burden on the environment from construction products by recognising and encouraging measures to optimise construction product consumption efficiency and the selection of products with a low environmental impact (including embodied carbon), over the life cycle of the building."***

However, RIBA stage 1 is a 'Preparation and Briefing' stage whereas RIBA Stage 3 includes the submission of a Planning Application. The planning application submitted by the developer does not contain a WLC Carbon Assessment. **This suggests that a WLC assessment is yet to be published, contrary to Hurley Palmer Flatt's Sustainability Statement.**

### **IV) Whole Life-Cycle Carbon Assessment**

As a result, I chose to conduct my own Whole Life Carbon Assessment, using the guidance from the GLA and from the [Institution of Structural Engineers](#).

As the drawings were the only available source of element dimensions and materials, a set of assumptions were used to conduct this assessment:

- Materials are assumed to be manufactured nationally, not internationally, or locally
- Construction cost was assumed to be approximately £47 million
- Member dimensions were obtained from the provided drawings
- Standard values for concrete, masonry and steel densities were assumed - displayed in the calculations provided with this document
- The embodied carbon of the various materials used in the building is compared to the energy savings guaranteed by the developer through Be Lean, Be Clean, Be Green commitments - namely mechanical ventilation and heat pumps
- The assessment excludes the basement, and the concrete bracing of the building, as well as formwork - **the results will therefore be conservative**
- Masonry cladding is included on all columns of the building
- The buildings demolished to make way for the development are not included within the carbon assessment
- All other assumptions are included within the calculations provided

The key takeaways from the WLC carbon assessment are the following:

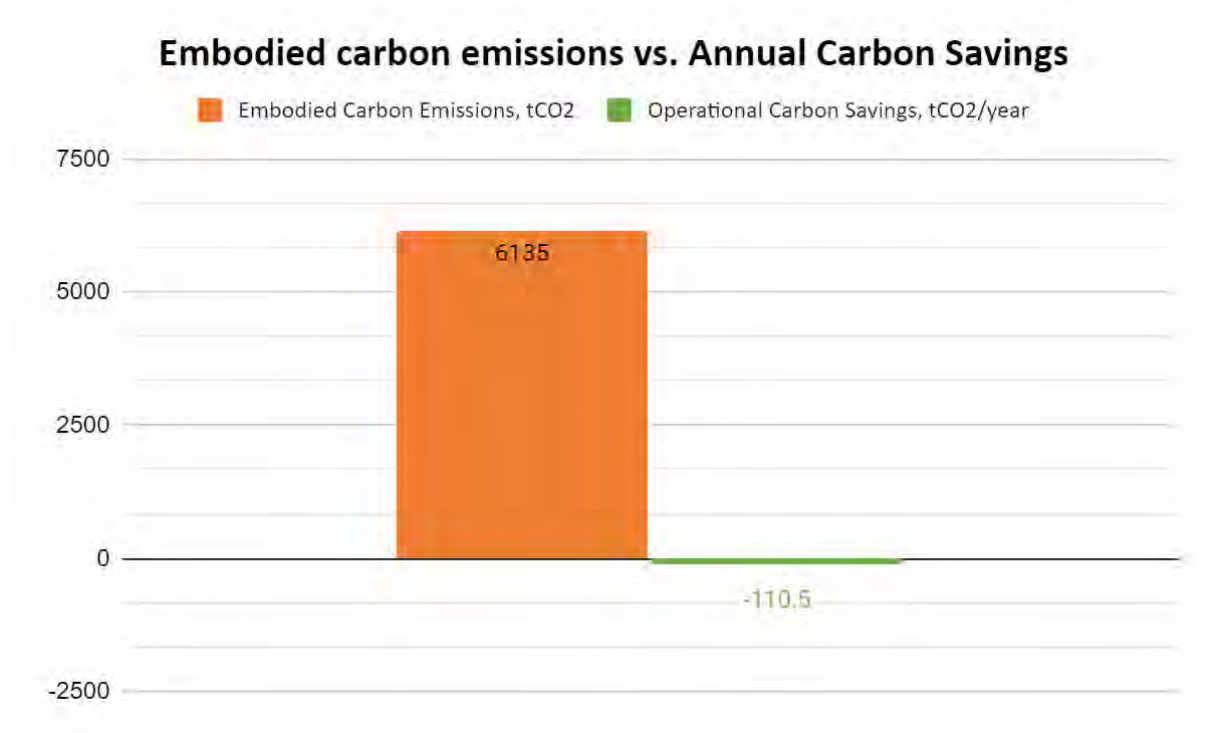
Concrete Carbon Emissions (kgCO <sub>2</sub> e)	Steel Carbon Emissions (kgCO <sub>2</sub> e)	Masonry Carbon Emissions (kgCO <sub>2</sub> e)	Other site activities (kgCO <sub>2</sub> e)	Total Embodied carbon emissions (kgCO <sub>2</sub> e)
4743737	895609	170322	325168	6134836

**Table 1 - Carbon Emissions for individual materials used for the construction of the Hondo Tower**

Total Embodied carbon emissions (tCO <sub>2</sub> e)	Operational Energy Savings - Be Lean, be clean, be green (tCO <sub>2</sub> e/year)	Time to offset (Years)
6135	-110.5	55.5

**Table 2 - Comparison between energy efficiency savings and embodied carbon emissions**

Whole Life Carbon Assessments are conducted because the carbon emitted during construction can be significantly larger than the energy savings promised after construction has been completed. The Hondo Tower is no exception, as is exemplified by Figure 1.



**Figure 1. Hondo Tower: Energy Saved vs. Embodied Carbon Emissions**

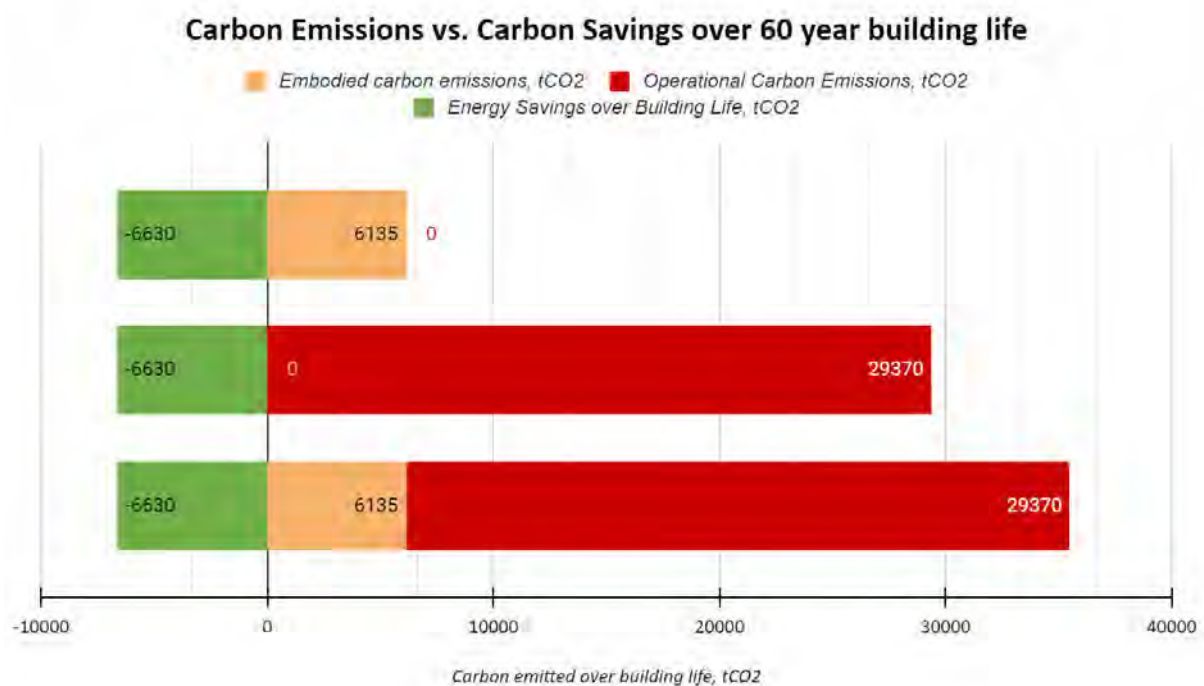
Our conservative assessment shows that the annual operational energy savings of the tower account for only 1.8% of the total embodied carbon so far calculated. Effectively, the total embodied carbon



emissions are at least 55 times higher than the annual energy savings of the structure. **In other words, it will take 55 years for the building to save as much energy as is emitted during construction. This holds significant importance because embodied carbon is the first carbon footprint to materialise - its footprint is set before the building is in operation, before energy savings can take effect.**

**This shows the importance of including WLC assessments in planning applications, which the developer has failed to do.**

When a 60 year life span for the building is assumed, the embodied carbon footprint is effectively offset from year 56. However, when operational and embodied carbon are taken into account together, it becomes apparent that the energy savings pale in comparison to the total carbon emitted by the development (Figure 2).



**Figure 2. Carbon emissions vs. Carbon Savings over 60 year building life**

#### **V) Operational energy efficiency - HPF Energy Statement**

As it pertains to operational energy, **Policy SI 2C** of the London Plan states:

***“A minimum on-site reduction of at least 35 per cent beyond Building Regulations 152 is required for major development. Residential development should achieve 10 percent, and non-residential development should achieve 15 percent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:***

- 1) through a cash in lieu contribution to the borough’s carbon offset fund***
- 2) off-site provided that an alternative proposal is identified and delivery is certain.”***

The Hondo Tower only achieves 31.5% on-site reduction, according to its Energy Statement prepared by Hurley Palmer Flatt. This failure to comply with the 35% on-site reduction requirement can be explained by specific design flaws in the building:

- The amount of glazing in the building dramatically increases heating and cooling demand, as windows constitute the largest source of heat loss in a building
- Columns, unlike walls, are uninsulated - the presence of over 65 columns in the building provides sources of cold bridging, in other words means for heat to escape
- Other structures, such as solar panels, cannot be added to the development because Hondo Enterprises has decided on a different purpose for the roof.
- Taller buildings are disproportionately more energy-intensive. A [2017 UCL study](#) funded by the Engineering and Physical Sciences Research Council (EPSRC). Wind Speed dramatically increases with height, especially for buildings which, like the Hondo Tower, are much taller than neighbouring buildings. This requires significantly more energy used for cooling. Similarly, tall buildings are exposed to higher direct hours of sun, requiring more energy for cooling.

Furthermore, **Policy EN4** of the Lambeth Plan, states:

***“D. Proposals should demonstrate in a supporting statement that sustainable design standards are integral to the design, construction and operation of the development. [...]Planning applications for non-residential developments should be accompanied by a pre-assessment, demonstrating how the BREEAM standards, or any future replacement standards, will be met.”***

The scheme only incorporates 1 “Be Green” Renewable Energy Technology, namely air source heat pumps. Within the Hurley Palmer Flatt Energy Statement, the following technologies are screened out:

Name of Technology Screened Out	Reason for Screening out (Amongst others)
Bio-fuel combined heat and power (CHP) local in the building	No constant hot water baseload demand
Fuel Cells	Insufficient space allowed for a fuel cell and associated auxiliary equipment within plan room
Biofuel Community heating scheme local in the building	Insufficient space for fuel storage Insufficient space for biofuel boiler
Wind turbines	Insufficient wind speeds Excessive Noise Disturbances
Photovoltaics (PV)	Insufficient roof space, as most of the south facing roof space will be reserved for the plant room
Ground source heat pumps	Insufficient space allowed for a Ground Source Heat Pump and associated auxiliary equipment within Plant Room

**Table 3. ‘Be Green’ Technologies Screened out in Hondo Tower Scheme**

The lack of 'Be Green' policies included in the scheme highlights a lack of consideration for sustainability within the building's initial design. The Hurley Palmer Flatt Energy Statement was conducted subsequent to the scheme design, and therefore suggests that sustainability was not an integral part of design.

#### **VI) BREEAM Rating - HPF Sustainability Statement**

The sustainability statement of the Hondo Tower, prepared by Hurley Palmer Flatt, indicates that the building is set to achieve a **BREEAM 'Very Good' rating of 66.57** (The benchmark for Achieving 'Very Good' is 55/100), with the potential to achieve an **'Excellent' rating of 75.01 (The benchmark for Achieving 'Excellent' is 70/100)**. It should first be noted here that 'Excellent' is not the first, but the second highest BREEAM rating, after 'Outstanding.' More importantly, Policy EN4 of the Lambeth Plan states, that:

***"C. In addition to the requirements for zero-carbon in major new developments in London Plan policy SI2:***

***i. All new non-residential development and non-self-contained residential accommodation, must meet at least BREEAM 'Excellent'.***

***ii. All major non-residential refurbishment of existing buildings and conversions over 500m2 floorspace (gross) must meet at least BREEAM Non-Domestic Refurbishment 'Excellent'. "***

The sustainability statement offers a breakdown of the Hondo Tower's potential BREEAM rating, showing that the building scores 4/13 on Reduction of Energy Use and Carbon emissions, and 0/3 on low carbon design.

As it pertains to Whole Life Carbon Assessments, the sustainability statement mentions that:

***"A life cycle assessment (LCA) tool is used to measure the environmental impact of the superstructure at the pre-planning and Technical Design (Stage 2) stages. Including benchmarking against the BRE database and an options appraisal of 4 significantly different design options. Note: HPF appointment is only for the pre-planning stages, to gain full credits, LCA must be updated at Technical Design Stage."*** (Figure 2)

However, although the scheme is currently past stage 3, Lambeth council is yet to receive any evidence that a whole life carbon assessment had been conducted.

The Sustainability Statement also adds:

***"A LCA options appraisal of at least six significantly different substructure or hard landscaping design options."*** (Figure 3)

Similarly, there is yet to be any evidence that this options appraisal has been conducted.



<b>Mat 01</b>	Environmental impacts from construction products - Building life cycle assessment (LCA)	7	5	5	<b>Credits 1-6 - Superstructure</b> <b>HPF (based on data from Adjaye and AKT)</b> <b>Targeted, 4 credits,</b> a life cycle assessment (LCA) tool is used to measure the environmental impact of the superstructure at the <b>pre-planning</b> and <b>Technical Design (Stage 2) stages</b> . Including benchmarking against the BRE database and an options appraisal of 4 significantly different design options. <b>Note: HPF appointment is only for the pre-planning stages, to gain full credits, LCA must be updated at Technical Design Stage.</b> <b>Credit 7 – Substructure and Hard Landscaping</b> <b>Targeted, 1 credit,</b> LCA options appraisal of at least six significantly different substructure or hard landscaping design options. <b>1 Exemplary Level Credit – Core Building Services Options Appraisal</b> <b>Targeted, 1 credit,</b> LCA options appraisal of at least three building services design options. <b>1 Exemplary Level Credit – LCA and LCC alignment</b> <b>Not Targeted, 1 credit,</b> LCC credits under Man 02 are not targeted. Would require alignment with LCA. <b>1 Exemplary Level Credit - Third Party Verification</b> <b>Not Targeted, 1 credit,</b> verification of the building LCA, by a suitably qualified third-party. <b>Evidence at Design Stage: Pre-Planning LCA results.</b>
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**Figure 3 - Sustainability commitments regarding Life Cycle Assessments (Hurley Palmer Flatt Sustainability Statement)**

These two commitments account for 5 total credits in assessing a BREEAM rating. Adjusted with the relevant weighting, the absence of a life cycle assessment results in a loss of approximately 6.8 marks. (Figure 4, Table 4)

Environmental section	Weighting		
	Fully fitted out	Shell only	Shell and core only
Management	12%	12.5%	11%
Health and Wellbeing	15%	10%	10.5%
Energy	15%	14.5%	15%
Transport	9%	11.5%	10%
Water	7%	4%	7.5%
Materials	13.5%	17.5%	14.5%
Waste	8.5%	11%	9.5%
Land Use and Ecology	10%	13%	11%
Pollution	10%	6%	11%
Total	100%	100%	100%
Innovation (additional)	10%	10%	10%

**Figure 4 - BREEAM Environmental Section Weightings**

When the absence of a Life Cycle Assessment is accounted for, the overall BREEAM mark reduces to 68.26, which corresponds to 'VERY GOOD'. This breaches policy EN4 of the Lambeth Local Plan. (See Table 4)

Previous BREEAM Rating	Previous BREEAM Mark	Credit Allocated to Life Cycle Assessments	Weighting	Total Marks Lost	New BREEAM Mark	New BREEAM Rating
EXCELLENT	75.01	5	1.35	6.75	68.26	VERY GOOD

**Table 4 - Updated Hondo Tower BREEAM Rating**

## CONCLUSIONS

This report was compiled in consideration of the climate emergency, which requires carbon neutrality by 2050; but also in light of BAME communities' vulnerability to the climate crisis, both in Brixton and abroad.

Following an extensive examination of the Hondo Tower's Sustainability proposals, the following policies are deemed to be breached:

- **Policy SI 2E and Policy SI 2F of the London Plan** - due through the failure to produce a detailed whole life carbon assessment of the structure. The life cycle assessment produced within this report is comprehensive, and emphasises the developer's lack of concern for sustainability issues.
- **Policy SI 2C of the London Plan** - due to the failure to meet the 35% on-site reduction in emissions. This points to a failure to consider embed sustainability within design.
- **Policy EN4 D of the Lambeth Local Plan** - due to the failure to provide any 'BE GREEN' technologies within the scheme, other than air source heat pumps.
- **Policy EN4 C of the Lambeth Local Plan** - due to the failure to achieve a BREEAM 'Excellent' rating, caused by the absence of whole life carbon assessment.

These 4 policy breaches constitute major indictments of the Hondo Tower development - we urge the mayor to reject this proposal.

[REDACTED]

## 20-24 POPE'S ROAD (GLA Stage 3 ref: 2021/0265)

Written representation submitted by [REDACTED]  
[REDACTED] (property directly affected by the proposed scheme on Coldharbour Lane)

Concerns about the impact of the proposed development (20-24 Pope's Rd) on amenity, sunlight and daylight.

### POLICY ANALYSIS

Lambeth Local Plan (September 2021) (LLP 2021)

- *Policy Q2 Amenity iii)*  
*[Development will be supported if] adequate outlooks are provided avoiding wherever possible any undue sense of enclosure or **unacceptable levels of overlooking (or perceived overlooking)***

- Discussion and criticism of 20/01347/FUL justifications for Non Compliance

The planning application recognizes 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)".* However, this aspect was not revised in the second set of amendments reported to Lambeth Planning Application Committee (PAC) in August 2020, because the officer's report considered that the scheme is *"designed to ensure no undue overlooking"*.

I believe this omission misled the PAC when assessing the level of overlooking this proposed development will cause on the neighbouring properties. As the officer's report acknowledges, the most severely affected *"rear windows"* are in fact the bedroom windows of Carney Place properties (also identified as Coldharbour Lane 360-372), which will directly face the proposed development at a distance of 17m. This distance is below the minimum between habitable rooms (i.e. 18m to 21m) that Housing SPG 2.3.36 consider as *"useful yardsticks for visual privacy"*. Indeed, the officer also employs 18m as the parameter to establish the properties most severely affected by the proposed scheme. Yet, the report considers that the identified severe impact is mitigated by the design of the building.

However, the drawings provided do not convincingly demonstrate that design is mitigating this severe overlooking on the neighbouring properties. The cross sections provided in the revised plans (dated October 2020), especially the Proposed Cross-Section E-E' and F-F', have carefully omitted the volumes of Coldharbour Lane. This makes it extremely difficult to understand the level of overlooking on these properties by the proposed development. Had these volumes been properly represented in the



cross sections, the unacceptable level of overlooking on the bedrooms of Coldharbour Lane would have been evident and changes to the massing and position of the building would have been required.

- Policy Q2 Amenity iv)  
*[Development will be supported if] it would not have an **unacceptable impact on levels of daylight and sunlight on the host building or adjoining property** including their gardens or outdoor spaces;*
- Discussion and criticism of 20/01347/FUL justifications for Non Compliance

The planning application refers to the GIA technical report to justify that “*unacceptable harm is not caused to the surrounding residential properties and the daylight and sunlight impacts are commensurate for the surrounding urban context*” in relation to Current and Future Baselines. The next paragraphs will consider the justifications that the GIA report provides for this positive assessment.

Paragraph 4.8 of the GIA report indicates that:

*“The suggested parameters and target values set-out in the BRE guidelines are based upon a suburban context. The guidelines also state that “the developer or planning authority may wish to use different target values. For example, 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.”*

Firstly, BRE guidelines do not specifically state that the parameters and target values are based upon a suburban expectation of reasonable daylight, although many sunlight and daylight professionals do appear to assume this. Notably Para. 2.2.7 of BRE states that

*“If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum. If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of daylight. The area lit by the window is likely to appear more gloomy, and **electric lighting will be needed more of the time.**”*

Clearly, the BRE guidelines indicate that the impact of any new development should not affect existing neighbours’ need to use electric lighting to supplement the amount of natural daylight they receive, regardless of whether these are occupants in urban or suburban settings. Therefore, the adoption of ATVs on the assumption that the BRE parameters are for suburban environments is not only a wrong interpretation of this guidance, but it can also trigger a significant energy impact on the neighbouring properties.

Secondly, Brixton is neither a historic city centre or an area with high rise buildings. The proposed building does not match the height and proportions of existing buildings, which are significantly lower and smaller. Therefore, to assume that a higher degree of obstruction is unavoidable is not justified because the existing urban fabric around the proposed development is not that dense. Finally, Para 1.6 of the BRE guidelines states that “***In special circumstances the developer or planning authority may wish to use different target values.***” However, these ‘special circumstances’ have not been identified in the report. For these reasons, the setting Alternative Target Values (ATVs) is not appropriate or adequately justified in the context of the application.

The officer’s report (Para 8.4.4) makes a similar reflection as the GIA report and states that:

*“The BRE guidelines are not mandatory; they do however act as a guide to help understand the impact of a development upon properties and other spaces, while acknowledging that in some circumstances, such as that of an urban environment or where the existing site is only previously partially developed some impact may be unavoidable. It should be further noted that the BRE guide considers level of daylight, sunlight and overshadowing tests based on an expectation of reasonable levels of light within a suburban context and this should be kept in mind when considering a central London context as is the case for the application site.”*

However, the officer’s report does not provide justified reasons for adopting ATVs either. In addition, there is no mention in the BRE guidelines to consider different values in the case where sites are partially developed, which further rejects the justification for the use of ATVs.

Paragraph 4.9 of the GIA report indicates that:

*“Given the advice set-out above; our own professional experience; and the retained daylight levels attributed to many recently consented schemes within London, we have set Alternative Target Values that we believe are commensurate for the Site and the surrounding context:*

- A window is considered to retain a reasonable VSC value, if it achieves 15% or more, following the implementation of the Proposed Scheme.*
- A room is considered to retain a reasonable NSL value, if it achieves 50% or more, following the implementation of the Proposed Scheme.”*

The BRE guidelines and methods for setting ATVs are set out at Appendix F. However, GIA has not adopted this methodology. Instead they have set ATVs which not only are not scientifically evidenced, they are substantial deviations from the BRE target values:

- 15% VSC compared to 27% VSC, which amounts to almost half of what BRE guidance considers an acceptable level of retained VSC.
- 50% NSL compared to 80% NSL, which amounts to a 30% reduction of what BRE guidance considers an acceptable level of retained.

These substantial deviations are claimed to be based on GIAs own professional experience and ‘recently consented schemes within London’. However, the report

does not provide evidence of 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.

Section 5 of the GIA report lists all the residential properties assessed against BRE criteria and those that achieve the BRE criteria. Para 5.4 then goes on to say:

*“Where changes in daylight and sunlight occur to the remaining properties, the impacts are fully discussed in the following sections. All results can be found in Appendix 04.”*

The results from the GIA analysis reveal that 120 habitable rooms/windows of surrounding residential properties would not meet the BRE guidelines for VSC daylight, 65 would not meet the BRE guidelines for NSL daylight and 2 would not meet the BRE guidelines for APSH sunlight. This totals **187 rooms/windows not meeting one or more of the BRE guidelines**. Of these, 126 are situated at 368-372 Coldharbour Lane- immediately adjacent to the site. However, the GIA Conclusion section, at Para. 7.6 presents these results as % rather than in absolute terms:

*“Based on the Current Baseline scenario, upon successful implementation of the Proposed Scheme, 11 of the 19 (57.9%) properties assessed will meet the national numerical values identified in paragraphs 2.2.21 and of the BRE handbook for daylight and sunlight. Overall, in relation to daylight, there will be an 86.7% compliance rate for VSC and a 90.7% compliance rate for NSL. In terms of daylight overall, 578 of the 702 rooms assessed achieve BRE compliance for both NSL and VSC (82.3%). In relation to sunlight, 99.5% of windows and 99.7% of rooms assessed will achieve compliance for APSH. Each of these overall figures is considered to be high, given the urban context of the Site. We are therefore of the opinion that overall, unacceptable harm is not caused to the surrounding residential properties and the daylight and sunlight impacts are commensurate for the surrounding urban context.”*

This presentation of the statistics is misleading. Rather than expressing the figures as percentages of the **rooms/windows assessed**, it expresses the percentages as those proportions of **properties assessed**. Furthermore, percentages are not indicative of the level of compliance – i.e., a larger sample of properties considered further afield would inevitably yield more compliant results. The fact that GIA draws their conclusion from the statistics presented in this way distorts the fact that there are a considerable number of rooms/windows that are non-compliant.

**I have collated the information presented in the GIA report and presented it in the form of summary tables at the end of this document (Appendix I).** These tables present a more accurate and clear analysis of the impact on daylight/sunlight from the proposed development on the surrounding residential properties. They show that a total of **187 windows/rooms do not comply with one or more of BRE guidelines**. Moreover, a total of **57 windows would suffer from daylight losses in excess of 40%**, and a total of **68 windows have a retained VSC lower than 15%**. In both cases, **the impact on those windows is significantly higher than the acceptable levels indicated in the BRE Guidelines**.

Despite this, the GIA report states that *“overall, unacceptable harm is not caused to the surrounding residential properties”*. However, in the recent decision by the



Secretary of State on the 8 Albert Embankment case (ref: APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106), he states that:

*“[the Secretary of the State] agrees with the Inspector in that he accepts **that the proposal would have a major adverse impact on the 24 rooms** on the lower floors of Whitgift House (IR731). He also agrees with the Inspector’s analysis of daylight effects at 2 Whitgift Street (IR732-735).”*

And that

*“... **those reductions** at Whitgift House and 2 Whitgift Street **would result in reductions greater than Building Regulations Establishment (BRE) guidelines**, in some cases substantially so, and residents [at Whitgift House and 2 Whitgift Street] would experience **an unacceptable increase in gloominess**. Accordingly, like the Inspector he attaches very significant weight to the harm to the occupiers of these two properties (IR759).”*

So the Secretary of State concludes that

*“For the reasons set out above the Secretary of State agrees with the Inspector overall, that **there would be harm to the living conditions of residents by reason of significant loss of daylight to windows and habitable rooms**, principally affecting Whitgift House and 2 Whitgift Street (IR837). He considers that the identified harms would involve a degree of conflict with the relevant development plan policies particularly in respect of aspects of LLP site allocation Policy PN2 (Site 10) as well as LLP policy Q2 and LP policies D3 and D6.”*

**The number of windows affected by the proposed development in Brixton is significantly higher than those in Albert Embankment.** Moreover, the significant reductions in daylight levels are considered to cause “an unacceptable increase in gloominess”. It is for these reasons that the Secretary of State, agreeing with the Planning Inspector, considers that overall there is harm on the living conditions. It is therefore surprising that the GIA report and the officer’s report consider that the severe impact on 57 windows in terms of daylight loss and 68 windows in terms VSC retained does not amount to significant harm on the properties. **Based on the Albert Embankment decision, I believe that the overall conclusion of the GIA and the officer’s report is wrong.**

At para 8.4.10 the officer’s report states that:

*“Appendix I of the BRE Guide sets out the following adverse definitions:*

- Minor Adverse: Reductions in VSC or NSL of >20% to 29.9%;*
- Moderate Adverse: Reductions in VSC or NSL of 30% to 39.9%; and*
- Major Adverse: Reductions in VSC or NSL of equal / greater than 40%.”*

This is factually incorrect. Although Appendix I of the BRE guidelines refers to three categories of minor, moderate or major adverse impact, it does not prescribe ranges of VSC or daylight distribution reduction in percentage bands.

The officer's report then includes a property by property analysis based on its own established numerical bands to conclude that isolated examples of non-compliance are considered acceptable/reasonable within an urban context. However, this conclusion is unfounded for several reasons. First, the officer's report acknowledges that, in Coldharbour Lane alone, 42 rooms will have a 'major adverse' impact with regards to VSC reduction. This number of rooms is significantly lower than those in the Albert Embankment case (24 rooms), which were not dismissed as 'isolated examples' but as a reason to deem the scheme as creating significant harm.

Second, the GIA report and the officer's report have not included the plans indicating the position of the windows analysed. Therefore, it is not possible to verify that the findings from such analyses actually correspond to the worst affected properties in Walton Lodge and Coldharbour Lane.

And third, the officer's report analyses the worst affected properties in Walton Lodge and Coldharbour Lane properties by considering bedrooms separately from living rooms and kitchens. However, the GIA results are not separated in this way. Therefore, it was not possible for the PAC (or the general public) to check the figures in the officer's report against those in the GIA one. I believe that this might have led to a series of inconsistencies that might have confused the PAC when assessing this application. Such inconsistencies are presented below:

#### *Inconsistencies in the analysis of Walton Lodge*

*"8.4.26 The majority of reductions to daylight VSC not meeting BRE Guide target criteria relate to bedrooms and can be summarised as 6 No having 'major adverse' reductions, 4 No 'moderate adverse' and 1 No 'minor adverse' reductions. In most cases the retained VSC values are below the mid-teens so clearly there is some significant adversity although this should be balanced with the inherent arrangement, that these windows are already typically partially restricted to daylight by their projecting or recessed positions to that of the main or rear elevation thus some degree of inherent sensitivity. Given that these reductions are to bedrooms, in terms of overall judgement, it is reasonable to consider overall a 'moderate' adversity."*

According to the GIA report there are 16 windows in Walton Lodge that do not meet BRE VSC guidelines. This overall figure is not indicated in the officer's report. Whilst the profile of the west façade is used to justify the relatively low values of retained VSC, what is not reported is that 4 of the 11 bedrooms not meeting BRE guidelines score as 'major adverse' on both VSC reduction and VSC retention. In addition, considering the adverse effect to bedrooms as an 'overall judgement' conceals the severity of the impact. This is not justified because, as the BRE guidelines at Appendix I state:

*"An adverse impact on one property cannot be balanced against negligible or beneficial impacts on other properties. In these situations it is more appropriate to quote a range of impacts."*

*“8.4.27 In addition to the bedrooms, there are some VSC minor adverse reductions 2 No living/ kitchen/dining rooms and 1 No kitchen but for these rooms, an acceptable or good retained VSC value is achieved.”*

According to the diagram presented by Schroeders Begg at the PAC meeting 25/8/20 (but not publicly available from Lambeth’s Planning Application website), one of the two living rooms that do not meet BRE reduction values falls into the ‘moderate adverse’ range for VSC reduction rather than the ‘minor adverse’ range. This is the living room on the 2<sup>nd</sup> floor to the north of the property. The GIA results do not distinguish between room types, and nor does the officer’s report state what the retained values of VSC are for these rooms. Nevertheless, since these rooms do not meet BRE for retained VSC, it is not appropriate to say that ‘acceptable or good’ retained VSCs are achieved, particularly since these are the type of habitable rooms that the BRE guidelines regard as more important.

*“8.4.28 Similar to VSC, the majority of reductions to daylight distribution not meeting BRE Guide target criteria relate to bedrooms and can be summarised as 5 No having ‘major adverse’ reductions, 3 No ‘moderate adverse’ and 1 No ‘minor adverse’ reductions. There is clearly some significant adversity although this should be balanced with the inherent arrangement, that the windows serving these rooms are already typically partially restricted to daylight by their projecting or recessed positions to that of the main or rear elevation thus some degree of inherent sensitivity. Given that these reductions are to bedrooms, in terms of overall judgement, it is reasonable to consider overall as ‘moderate’ adversity.”*

According to GIA results, there are 10 rooms in the Walton Lodge property that do not meet BRE recommended values for Daylight Distribution/No Sky Line. This overall figure is not contained in the officer’s report. However, according to the diagram presented by Schroeders Begg at the PAC meeting 25/8/20, there are only 9 such rooms and none were identified as likely to suffer minor adversity. In addition, the GIA results relate to reductions in Daylight Distribution, so the calculation is relative and therefore already takes account of the existing recessed/projecting conditions of the windows in question. This paragraph is therefore also misleading and under-represents the number of rooms adversely affected.

*“8.4.29 In addition to the bedrooms, there is ‘minor adverse’ reduction in daylight distribution to 1 No living/kitchen/dining rooms. This impact is considered to be acceptable.”*

There is no explanation for why the daylight distribution impact is considered acceptable in this living room when it does not meet the recommended BRE value.

Finally, the officer’s report considers VSC and DD separately but does not draw the results of the two aspects of daylight together. BRE considers that if either VSC or DD values are not met, then the rooms in question would suffer adversely. According to the GIA report, there are 16 cases of divergence from BRE VSC values and 10 cases of daylight distribution divergence - a total of 26 instances where at least one of the BRE criteria are not met.



### Inconsistencies in the analysis of 368-372 Coldharbour

According to GIA results, 73 windows in Coldharbour properties do not meet the BRE value for VSC. However, this figure has not been included in the officer's report. It is worth reminding that the recent decision by the Secretary of State on the 8 Albert Embankment case (ref: APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106) states that:

*"[the Secretary of State] agrees with the Inspector in that he accepts **that the proposal would have a major adverse impact on the 24 rooms** on the lower floors of Whitgift House (IR731). He also agrees with the Inspector's analysis of daylight effects at 2 Whitgift Street (IR732-735)."*

And that

*"... **those reductions** at Whitgift House and 2 Whitgift Street **would result in reductions greater than Building Regulations Establishment (BRE) guidelines**, in some cases substantially so, and residents [at Whitgift House and 2 Whitgift Street] would experience an unacceptable increase in gloominess. Accordingly, like the Inspector he attaches very significant weight to the harm to the occupiers of these two properties (IR759)."*

So the Secretary of State concludes that

*"For the reasons set out above the Secretary of State agrees with the Inspector overall, that **there would be harm to the living conditions of residents by reason of significant loss of daylight to windows and habitable rooms**, principally affecting Whitgift House and 2 Whitgift Street (IR837). He considers that the identified harms would involve a degree of conflict with the relevant development plan policies particularly in respect of aspects of LLP site allocation Policy PN2 (Site 10) as well as LLP policy Q2 and LP policies D3 and D6."*

As confirmed by Schroeders Begg at the PAC meeting on 25/8/20, the floor plans for these properties were taken from Planning Application drawings and therefore do not necessarily correspond to their current room uses. Indeed, many of the bedrooms in these blocks have been repurposed as working spaces during the pandemic and those uses could be expected to continue in the future as working patterns become more flexible. Therefore, the analysis should not assume that bedrooms can simply have lower levels of daylight because habitable rooms serve (and always have) multiple functions.

*"8.4.32 For the north facing elevation, the majority of reductions to daylight VSC to windows do not meet BRE Guide target criteria; with the exception of 1 No living room, these all relate to bedrooms. In terms of reductions to bedrooms, these can be summarised as 46 No. having 'major adverse' reductions, 11 No. 'Moderate adverse' and 2 No. 'Minor adverse' reductions; thus in total 59 No windows in the north elevation having a noticeable impact. However, in 28 No. instances (circa 50%) the*

*retained VSC values are mid-teens or above. In addition, for the isolated 1 No living room, there is a major adverse reduction to VSC."*

As mentioned above, the GIA report has not included drawings with the position of the assessed windows, which makes it difficult to ascertain the accuracy of both the GIA report and the officer's report. In addition, there is a discrepancy between the above figures and these statistics reported to the PAC meeting 25/8/20. According to the diagram presented by Schroeder Begg at that meeting, there were 59 rooms on the north elevation of the building that did not meet BRE VSC reduction values. This is one room shorter than in the officer's report, which also identifies 1 living room that does not meet the BRE VSC reduction values.

As the GIA results do not analyse the rear elevation separately, it is again not possible to verify the levels of retained VSC reported by Schroders Begg. In addition, if in 28 instances the retained VSC values are 'mid teens or above', this leaves 31 (more than 50%) of instances for bedrooms where the retained VSC is less than or equal to only 15% compared to 27% (BRE levels). Also the retained VSC value for the isolated living rooms is not reported.

*"8.4.35 For the windows serving rooms within the west facing elevation, which includes a significant number of living room windows, in terms of daylight VSC, there are some isolated 'minor adverse' reductions whilst for daylight distribution, reductions meet the default BRE Guide target criteria."*

According to the GIA results, overall there are 73 windows in this property that do not meet BRE guidelines in terms of VSC. Therefore either 12 or 13 windows on the west elevations are non-compliant with BRE VSC values, which as the officer's reports states would affect a significant number of living room windows. To report 12/13 windows as 'isolated' instances is misleading.

*"8.4.36 In summary, there is significant adversity to the windows and rooms served by those windows in the north facing elevation facing the railway / closest to site) and limited adversity to those in the west facing elevation (the latter should readily be considered acceptable). For the north facing windows / rooms, the majority relate to bedrooms which appear to be within dual aspect flats (based on floor plans) and with living rooms facing the central courtyard to the south (with the exception of 1 No. ground floor living room served by a window in the north elevation although this particular flat appears to still have a separate open-plan kitchen dining room viewing onto the central courtyard to the south). On balance, given that the majority of reductions are to bedrooms, albeit there is also one living room, in terms of overall judgement, it could be considered overall as 'high moderate / low major' adversity with due consideration that the flats are dual aspect and majority relating to bedrooms, although quite an extensive number of bedrooms."*

There is no justification for considering the daylight impact on the west facing windows as acceptable. Even though these rooms have been categorized as 'minor adverse' they still do not meet the BRE targets and relate predominantly to living rooms.

The fact that the majority of bedroom windows affected on the north elevation are within flats that are dual aspect is irrelevant because those bedrooms do not benefit from the dual aspect. Moreover, as mentioned previously, the impact of the pandemic has meant that many of the bedrooms have been used as working spaces. This trend is likely to continue for the foreseeable future due to the increase of flexible working patterns. Therefore, it is not acceptable to assume that these bedrooms do not need optimal daylight conditions as they will be used for more than simply sleeping.

- *Policy PN3 Brixton*  
*Site 16: Brixton Central (between the viaducts) SW9*  
*The council will support development on the site that (...) (x) proposes low buildings to protect the amenity of new residential development on Coldharbour Lane adjoining the site.*
- Discussion and criticism of 20/01347/FUL justifications for Non Compliance

The planning application recognises that the proposed development is a departure from this policy, but considers that it would not *“conflict with policy in all other regards and it would deliver a wide range of social, economic, environmental and sustainable benefits to the community.”* The officer’s report to the PAC makes a similar statement:

*“Notwithstanding that the proposal represents a departure from Policy Q26 and Site Allocation 16 of the Local Plan, the application scheme is considered not to conflict with policy in all other regards and as such, as a policy compliant scheme it would deliver social, economic, environmental and sustainable benefits to the community.”*

However, the report does not explain where exactly the proposed scheme deviates from Policy PN3. Therefore, the PAC report minimizes the mighty significant deviation from policy that the proposed development represents (i.e. a tall building where there is explicit preference for a low one). This omission helps the GIA report to justify to the PAC the impact of this tall building on the daylight of neighbouring properties, on the assumption that this is acceptable for urban environments. But, as demonstrated above, not only is such assumption not supported by the BRE guidelines, the location of the proposed development has been clearly identified in the Local Plan for low buildings – which would not have incurred any significant daylight and sunlight impacts on its surroundings.

There is also evidence of Lambeth’s long-standing preference for low buildings in this area. The planning history of Carney Place properties (also identified as Coldharbour Lane 360-372) is a case in point. The original planning applications for 368-372 Coldharbour Lane (05/01015/FUL and 05/01016/FUL) were rejected on several grounds, including the height of the proposed development – i.e. 12 storeys. The rejection was appealed and subsequently called in by the Secretary of the State, who dismissed the appeal and upheld the Inspector’s decision. Among the reasons given by the Secretary of the State for supporting the rejection of the original scheme were:

*“The tall element of the scheme does not make a positive design statement but would rather detract from the skyline of the area around it.*



*The development would be oppressive in terms of its sense of enclosure as a result of the tightly enclosed courtyard, privacy for some flats and the height of the buildings.”* (p.7 of Planning Statement 06/04037/FUL)

As a result, the applicant revised the original proposal and presented a scheme of blocks surrounding the courtyard ranging from five to seven storeys high, with the highest blocks facing the railway line and the site of the proposed Hondo Tower. This new application (06/04037/FUL) was finally approved and developed into the existing residential blocks at 368-372 Coldharbour Lane.

This case provides further evidence that the area has never been considered adequate for tall buildings because of the damaging impacts on privacy and skyline, a view shared in common by the Planning Inspector and the Secretary of the State as well as the Lambeth Local Plan. The proposed scheme 20/01347/FUL disregards all this planning history without any convincing justification for it.

- *Discussion and criticism of 20/01347/FUL justifications for Non Compliance with BRE Guidelines for Non residential*

Although the GIA reports confines itself to analysing the impact of the proposal on daylight and sunlight to residential buildings, Para. 2.2.2 of the BRE guidelines states that:

*“The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would include hospitals, hotels and hostels, small workshops and some offices.”*

In addition, Para. 3.2.1 of the BRE states that

*“In designing a new development or extension to a building, 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 Recreation Centre and Granville Arcade 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.

## **SUMMARY COMMENTS**

I have collated the results from the GIA analysis in a series of summary tables (see Appendix I). These summaries, which would have been very useful for the PAC, highlight the real impact of the proposed development on the neighbouring properties. They reveal that 120 windows in surrounding residential properties would not meet the BRE guidelines for VSC daylight, 65 would not meet the BRE guidelines for NSL daylight and 2 would not meet the BRE guidelines for APSH sunlight. This totals 187 instances not meeting BRE guidelines, 126 of which relate to 368-372 Coldharbour Lane and 26 of which relate to Walton Lodge.

Notwithstanding the fact that GIA did not use the BRE guidelines for VSC and instead used their own subjective 'alternative target values' (ATVs), which Schroeders Begg seem to have adopted, **68 windows would only retain a VSC of between 0% - 15% and 57 windows would suffer from daylight losses in excess of 40%.** This means that all these properties will have to use the electric light for a longer period to compensate for their significant loss of natural light, as explained in the BRE guidelines.

**Taking into account the recent decision by the Secretary of the State on the case of 8 Albert Embankment** (ref: APP/N5660/V/20/3254203 & APP/N5660/V/20/3257106), where the severe impact on the daylight conditions of 24 rooms meant the scheme was considered harmful to the surrounding properties, I believe that **the numbers indicated above are strong evidence of the harmful nature of this proposed development on its surroundings.**

In addition, the analysis of the GIA report is missing some vital information – i.e. a map of where each of the affected windows are situated or differentiate between bedrooms and living rooms. In addition, it does not clearly summarised the total number of windows not meeting BRE guidelines, or the level of adversity on them. I believe that the summary tables included in the Appendix would have helped the PAC to have a clear understanding of the harm this proposed scheme would cause on the surrounding properties. The PAC's ability to make a fair assessment of daylight/sunlight impact was therefore compromised.

According to the officer's report, Schroeders Begg carried out an independent review of the GIA report but this review has not been published. Instead, the Lambeth officer's report appears to refer to Schroeder Beggs findings on a property by property basis, but once again no overall statistics are presented. Although Schroeders Begg gave a presentation to the first PAC meeting, that presentation was never presented to the PAC in written form, so their ability to take in all the information and carefully assess it before making a decision was clearly compromised.

In all, this written representation argues that the proposed development will cause an excessive, unjustified and unacceptable level of daylight loss on the surrounding properties. The GIA report and the officer's report minimise the seriousness of these impacts when they assume that bedrooms can be significantly impacted, as indicated in the previous paragraph. However, our tables show that the scale and quality of the impacts on the surrounding residential properties will be significant and severe. I think

that the PAC would have probably felt the same had they seen a similar detailed breakdown. In addition, we believe the Albert Embankment case proves that the harm inflicted by this proposed scheme must be considered harmful and significant. Finally, I would like to remind people that behind the affected windows there are people living their lives. These affected rooms are where many residents spend a considerable amount of their day time and therefore play a paramount role in their “sense of wellbeing in the home” (London Housing SPG 2016, para. 2.3.35). A severe impact on the daylight levels of these properties is a severe impact on their wellbeing.

*For all these reasons, I believe the harm of the proposed development on **daylight and sunlight conditions** is not justified and cannot be simply balanced up with the benefits from other aspects. Therefore, I am respectfully asking the Mayor of London to reject the proposed development and spare the residents of Carney Place from its unacceptable harm to our lives. Thank you.*

[REDACTED]



## **APPENDIX I**

### **Rooms/windows in proposed development not meeting BRE guidelines**

	<b>VSC</b>	<b>NSL</b>	<b>APSH</b>
Granville Court	4	0	N/A
Valentia Place	2	0	0
368-372 Coldharbour Lane	73	53	0
Chartam Court	15	1	0
Westgate Court	8	0	2
Wincheap Court	0	1	0
28 Atlantic Road	2	0	0
Walton Lodge	16	10	0
<b>Total</b>	<b>120</b>	<b>65</b>	<b>2</b>
	<b>187</b>		

A total of 187 windows/rooms do not comply with one or more of BRE guidelines. Of these, 126 are situated at 368-372 Coldharbour Lane, the property right opposite the proposed development.

### **Detailed breakdown of VSC loss in each property.**

	<b>20% - 30%</b>	<b>30% - 40 %</b>	<b>&gt; 40%</b>
Granville Court	4	0	0
Valentia Place	1	1	0
368-372 Coldharbour Lane	15	11	47
Chartam Court	15	0	0
Westgate Court	2	2	4
Wincheap Court	0	0	0
28 Atlantic Road	2	0	0
Walton Lodge	5	5	6
<b>Total</b>	<b>44</b>	<b>19</b>	<b>57</b>

A total of 57 windows would suffer from daylight losses in excess of 40%, way above the BRE guidelines and falling within the 'major adverse' category set in the officer's report.

**Detailed breakdown of VSC retained in each property.**

	<b>0% -15%</b>	<b>15% -20%</b>	<b>20% - 27%</b>
Granville Court	0	2	2
Valentia Place	2	0	0
368-372 Coldharbour Lane	39	24	10
Chartam Court	15	0	0
Westgate Court	1	7	0
Wincheap Court	0	0	0
28 Atlantic Road	0	0	2
Walton Lodge	11	3	2
<b>Total</b>	<b>68</b>	<b>36</b>	<b>16</b>

A total of 68 windows have a retained VSC lower than 15%, the minimum set in the GIA report as acceptable. A total of 120 windows are below the 27% VSC retained minimum standard set in the BRE guidelines. This means that 120 windows will have to use the electric light a lot more to compensate for the significant loss of natural light, as indicated in the BRE guidelines.

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**

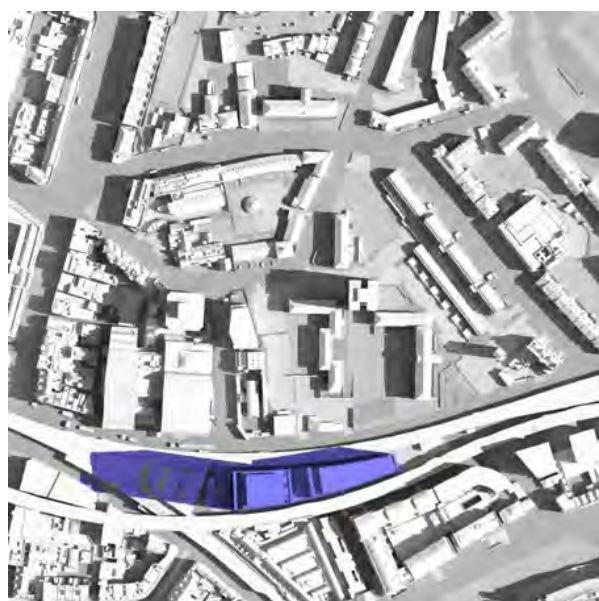
The proposal also fails to meet policy PN3 (K) of the Lambeth Plan. The site allocation for Site 16 (Brixton Central – between the viaducts) includes the application site and under the heading 'design principles and key development considerations', it states that the council will support development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



-

**Written representation submitted by :**

[REDACTED]

### Transport Written Representation – Planning Application 2020/5276/S1

The proposed Hondo development will have a significant negative impact on public transport within Brixton and London. This is both because it removes the possibility of introducing an overground connection in the area and as it will introduce new volumes of commuters to Brixton which have not been properly accounted for in Hondo's plans. In addition, in the process of blocking an opportunity for the construction of an Overground connection in Brixton, the application breaches the London Plan and critically limits Lambeth's ability to implement a key policy commitment contained in its Local Plan.

#### Removing Option for an Overground Station in Brixton

Currently the Overground line that provides an east-west orbital public rail service for London passes through Brixton without stopping. These tracks are immediately adjacent to the application site. The only interchanges with radial routes in and out of London on the Overground line in south London are at:

- Clapham High Street - links to Clapham North on the Northern Line of the London Underground via a walk across a main road
- Denmark Hill - link to Thameslink

The next nearest link to the London Underground is at Canada Water.

Lambeth Council made a commitment to introduce an overground connection on the East-West Orbital Line between Highbury and Islington and Clapham Junction in the Council's 2015 Local Plan. Para 2.197 of the newly adopted Lambeth Plan 2021 states that:

*As already highlighted under section B above, it will not be possible to achieve the significant levels of housing and economic growth set out in the Local Plan without the supporting **transport infrastructure** required for people to travel to and from work, shops and leisure destinations. **Existing public transport in Lambeth is already very well used and over capacity in some cases, and current improvements will not achieve the level of capacity increase that is needed.** Public transport accessibility also varies, with some parts of the borough – particularly in the south – quite poorly served. **Overall, radial transport (into the centre of London) is better in Lambeth than orbital transport (east-west).** Investment in station capacity, **track layouts** and signalling improvements as part of the 'metroisation' of rail services is required to support the transport infrastructure capacity needed in the borough. Improved sustainable transport links will also help to reduce borough wide carbon emissions.*

Lambeth's current Public Transport policy is set out in T4 of Section 8 of the Lambeth Plan 2021 and this includes a continued commitment to 'improved interchanges and east-west

orbital links'. Additionally, in Section 11 of the Lambeth Plan 2021 (Places and Neighbourhoods), the policy states at para 11.55 in relation to Brixton station that

*'improved access to east to west rail services, such as the Overground, is also desirable and the council is keen to explore longer term options to deliver this'.*

Section 8 of Lambeth Plan 2021 states at par 8.1 that:

*The **Lambeth Transport Strategy 2019** and **Transport Strategy Implementation Plan** sets out the council's strategic vision for transport in the borough. Development is expected to support delivery its objectives.*

And para 8.23 states that:

*The key transport infrastructure projects to be delivered during the plan period are listed in the **Infrastructure Delivery Plan**.*

The Adopted Local Plan para 2.32 states that, according Lambeth's Transport Strategy 2019, passenger growth over the past 10 years on the overground has been 'strong'.

The Lambeth Infrastructure Delivery Plan 2020 states at para 4.3 that:

*"The following projects are expected to be delivered between 2024/25 and 2034/35: ...*

- ***Orbital rail connections – a set of infrastructure improvements, including the provision of new platforms to provide an interchange with London Overground and other orbital services in the Brixton/Loughborough Junction area, as well as platform lengthening to accommodate longer trains at Wandsworth Road and Clapham High Street"***

Annex 1 of the Delivery Plan references the Lambeth Local Implementation Plan III March 2019, which states at Outcome 5 ("Public Transport will meet the needs of a growing London"):

*"The overarching aim of the MTS [Mayors Transport Strategy] is to reduce the amount of traffic on our roads so when looking at how to increase the number of journeys by public transport we need to consider how it can be made a more attractive option for car drivers...While fewer than 10% of journeys to work are made by car in the central and northern parts of the borough, nearly 20% of commutes in the south of the borough are by car. The breakdown of where commuter inflows and outflows are heading shows that **it is largely orbital travel to the west, east and south where the opportunities lie**. An improved public transport offer to these destinations has the potential to attract car drivers...Improvements to suburban rail services in London, such as the **London Overground orbital route** have shown how good quality public transport offer attracts customers. Clapham High Street station on the **Overground orbital line has seen a dramatic growth in passenger numbers of nearly 1,000% over 10 years**. TfL's business case for devolving control of other suburban rail lines to be under the Mayor's control highlights how **people in Streatham choose to take bus services to access the high frequency Victoria Line at Brixton, rather***

***than use closer rail stations with an infrequent service. Delivery of a south London metro service on these suburban lines would be a big opportunity to increase mode share of public transport...We will work with industry stakeholders and through the planning process to secure improvements to capacity, access and interchange at Waterloo, Vauxhall and Brixton stations and investigate options for an additional Overground station in the borough."***

The same plan notes that Lambeth must '*apply London Plan policy T3 to support and safeguard improvements to public transport*'.

The development would contravene Policy T1 in the London Plan titled 'Strategic Approach to Transport'. This policy requires that:

*"All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated."*

It is therefore clear that the Lambeth Plan 2021 recognises the popularity and success of the east-west Overground service in reducing commuter car use and is committed to pursuing opportunities for introducing an interchange station on the Overground in the Brixton area.

The feasibility of introducing an overground station at Brixton was addressed in a study conducted for the Council by Steer Davies Gleave in 2014. The 2014 feasibility study found that the number of passengers using Lambeth's four overground stations grew over the previous five years, higher than previously estimated. Additionally, by creating direct travel options in south London to destinations only possible via 'circuitous routes via public transport' would align with sustainability goals as well as 'generate a base level of demand in the order of two million passengers'.

The study demonstrated that a station could be constructed at Brixton interchange with the Victoria Line London Underground, together with interchange connections to the Chatham and Catford Loop lines.

One of the two options considered in the study was to swap over the existing Catford Loop Line tracks with the Overground tracks and create a platform between them to serve both lines. This platform would be situated on the site of the Hondo application. Another option considered was to construct a high-level viaduct and station over the existing Catford Loop line. This again would involve a platform being situated on the site of the Hondo application.

Clearly both of these options would necessitate making use of the application site to be able to achieve a new stop on the Overground line at Brixton and therefore the proposed Hondo development would remove a key opportunity to improve Brixton and London's public transportation. This would be in contravention with the Mayors London Plan policies T1 and T3 and would severely limit Lambeth's ability to implement its policy commitments as spelled out in its Local Plan.



Removing the opportunity to construct an overground station which would bring considerable benefits to the area does not appear to align with a policy of safeguarding as committed to over a 6-year period.

Further, the London Plan – according to the Good Growth Fund page on the GLA website – *“sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years”*. Looking to the long-term development of public transport infrastructure in South London, preventing a prime opportunity to integrate environmental and social goals by improving connectivity in an area not met by an underground route or Network Rail, is in distinct discord with this purported strategy. This also links to the circular economy strategy, moving towards a more extensive, high quality public transportation network with low emissions and significant reach.

The Hondo development would limit future public transport opportunities and provides insufficient mitigation for removing the possibility of an Overground connection in Brixton. As well as the above policy breaches, this is in contravention to the Planning Performance Agreement signed in 2019. Paragraph 6.2 states that the development must promote:

*“sustainable modes of transport whilst minimising any impact on the amenity of residents. The scheme **should serve as an example that can be built upon in the development of proposals for further expansion in line with the council’s programme**”*

The development cannot serve as a suitable example for future developments if it obstructs a future key transportation connection in the local area. Further, paragraph 8.3 iii states that the proposed scheme must be

*“serviced in an acceptable manner and delivers appropriate infrastructure to **optimise accessibility by a choice of transport modes**. To ensure that the construction of any future development **minimises the impact on surrounding Network Rail assets and the operational railway**.”*

The development reduces accessibility by a choice of transport modes due to its obstruction of the establishment of a new Overground connection in Brixton. As a consequence of this, its situation between two rail viaducts indeed impacts surrounding Network Rail assets and railways.

In 2014, at a Mayor’s Question Time, it was outlined that the cost of constructing the station and relevant infrastructure would cost upwards of £80 million. Compared to the budget allocated to an entirely new national rail station being constructed in Reading at Green Park – circa £17 million (comprised of £9.15 million from the Local Growth Fund, Section 106 developer contributions of £5.6m, and £2.3 million from the Department for Transport’s New Station’s Fund) – including an entire station building and road connections, it appears these could be an overestimation.

Further, the potential benefits an overground connection could bring to Brixton have been analysed by several sources. In 2018, Clapham Transport Users Group argued in favour of the station in order to reduce dangerous overcrowding at Clapham North and Clapham Common tube stations on the Northern Line. In addition, growing passenger numbers to

and from Brixton itself have increased the need for improved transportation capacity in the area. Opening an overground station on the Atlantic Road site, as stated in the 2014 feasibility study, would create commercial opportunities through its placement at the heart of Lambeth's redevelopment plan. Despite high risks of disruption, close links to other transportation routes and high potential for commercial and residential development make the case for keeping the position between the viaducts a viable option fiscally logical. The developer's figures underestimate the hindering impact on public transport that the development will have, in terms of capacity and long-term viability through passenger numbers for TfL. The Station Audit Assessment in the same study found Brixton's railway station to be dismally underperforming. Although conducted in 2014, minimal changes have been implemented to alleviate conditions reported in the scathing assessment by Steer Davies Gleave, finding Brixton station to lack signage, aesthetics, amenities, and sufficient access, in addition to being visibly poorly maintained with poor levels of service information.

It is therefore astonishing that neither the transport reports prepared for Hondo or the Lambeth officers report make any reference to the obstructed opportunity to open an Overground station, nor any consideration of the additional commercial benefits this may have brought to Brixton. The Brixton Society raised this issue in their objection to the application, but this was not addressed in the Officer's Report.

#### Hondo Considerations on Transport

Considerations made by Hondo to the impact of several hundred additional commuters entering and leaving Brixton are limited. Commissioned in March 2020, transport planning consultants Caneparo Associates prepared a transportation report for Hondo's development. The report's conclusion states that:

*"The proposed development will result in an increase in trips made by public transport and active modes, which can be supported by existing capacity subject to further discussion with the highway authorities regarding mitigation measures to be secured by planning condition and/or S106 legal agreement."*

This projected increase in trips made by public transport is based on 2011 census data, which is 10 years out of date and crucially therefore does not take into account recent and current strategies within the borough and by the Mayor for London as a whole to reduce car use and increase use of public transport.

The figures projected by Caneparo total 699 additional trips in the peak morning period and 635 after work hours end. The report goes on to state that, regarding the underground, train and buses it was considered that, despite 83.75% of employees not being residents (as stated in the Officer's Report) the impact 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. In addition, Hondo's report, produced by Volterra, on job creation forecasts that an additional 1800 jobs would be created by the development. However, the trip generation figures only account for an additional 863 trips in the morning and 784 in the evening,

including walking. These figures only include the extra transport demand from office space, stating that leisure and restaurant staff are not included in these figures due to them being “secondary” trips. This logic is flawed, as these workers would be commuting as a direct result of the development. In addition, the GLA Stage 1 report at paragraph 60 states that trip generation for market and community must be factored into transport impact assessments, which Hondo did not as cited again in the GLA Stage 2 report paragraph 2.

The developers have been required by TfL to provide a section 106 payment of £450,000 towards mitigating the impact on buses. This is due to be paid in two instalments – one six months before completion and the second one year after the first. The two instalments of £225,000 are to pay for three additional bus journeys in the peak hours over two years. In this regard, three additional bus journeys for peak hours does not accord with a “negligible” impact. In addition, the GLA Stage 1 report states a bus contribution of £1.125 million was required from Hondo to cover three additional buses over a five-year period, but only £450,000 was agreed. The Planning Performance Agreement for the development signed in 2019 states at paragraph 7.2 that the developer must ensure “that appropriate S106 obligations are negotiated that contribute commensurately towards infrastructure in the area and that mitigate any impacts of the Scheme that there may be”. This does not appear to have been met, if only two out of five years of required bus mitigation funding has been agreed.

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”. The sites chosen to compare with this development are almost all very different sizes to the site in question in terms of office space, and only one location is in Lambeth. We deem this to be in contravention to the recommended use of the TRICS database, and in disagreement with the statement in Hondo’s transport assessment.

The developer’s figures therefore underestimate and misrepresent the impact on public transport that the development will have.

Therefore, I would kindly urge the Mayor to reject Hondo Enterprises planning application as it breaches various planning policies of Lambeth and London. In addition to that it removes any future opportunity for the Brixton community and South London to access an East / West overground service in this location.

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



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 October 2021 15:14  
**To:** All Planning Staff [REDACTED]  
**Subject:** Agreed Agenda Outcomes from Jules Planning Meeting on Thursday 21st October 2021  
**Attachments:** Agreed agenda outcomes 21st October 2021.docx

Hi all,

Please see the attached agreed Agenda Outcomes from the meeting on Thursday 21<sup>st</sup> October.

The Jules planning meeting Outcomes Tracker - [REDACTED]

**Could all case officers that have presented a recent item at the Jules Issues Planning meeting please review this and update the status of their item on the tracker.** This document will then be reviewed at the next SMT meeting.

Kind regards,  
[REDACTED]

# Agreed Agenda Outcomes

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## Jules Planning Meeting

**Date:** Thursday 21st October 2021

**Time:** 10.00-12.00

**Venue:** Microsoft Teams

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	Item	Officer	Purpose	Outcome
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	<b>Popes Road</b> <b><i>Written briefing</i></b>	[REDACTED]	To provide an update on the implications of height reductions on the proposed scheme and an update on conversations around the proposed public benefits package.	Update provided.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 October 2021 11:03  
**To:** [REDACTED]  
**Subject:** RE: Pope's Road

Hi [REDACTED]

[REDACTED] [Regulation 12 (4)(e)]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] <[REDACTED]@dp9.co.uk>

**Sent:** 22 October 2021 10:46

**To:** [REDACTED] <[REDACTED]@london.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@dp9.co.uk>

**Subject:** Pope's Road

Dear [REDACTED]

Is there any update following the meeting yesterday?

Thanks

[REDACTED]  
Associate Director

direct: 020 [REDACTED]

mobile: [REDACTED]

e-mail: [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

**DP9 Ltd**

100 Pall Mall

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 October 2021 14:59  
**To:** [REDACTED]  
**Subject:** RE: Pope's Road Jules Briefing

Well done, very happy with that.

Thanks

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 21 October 2021 14:22  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road Jules Briefing

Hi [REDACTED]

I started having the same thought when I got to the fourth layer of \*s. Have amended the table to add a market discount column.

Application	Total office floorspace	Affordable office floorspace	Percentage	Market discount
Pope's Road (proposed)	25,225 sq.m.	Minimum 2,400 sq.m.	12.5%	50%
Bishopsgate Goodsyard	Up to 130,940 sq.m.	Up to 11,000 sq.m.	8%	50% average
- Hackney	116,201 sq.m.	8,715 sq.m.	7.5%	60%
- Tower Hamlets	22,822 sq.m.	2,282 sq.m.	10%	10%
5 Kingdom Street	48,264 sq.m.	3,900 sq.m.	8%	50%

Also, I looked into the committee report and this bit is in the second addendum:

*Following further discussions with the applicant, in order to demonstrate their commitment to working with the community to deliver on the vision principles set out in the above section, they would increase their community benefits offered in the following manner: a 25% uplift in affordable workspace from the emerging policy position, and that presented to committee previously. This would see 12.5% of total B1 floorspace on an NIA basis would total 2,400sqm which is an increase of circa 500sqm of additional floorspace being secured at 50% below market rents over and above the offer previously before committee.*

I've emailed Shane to arrange a chat to go over floorspace figures, but thinking it's best to send through the slides to Jules in the meantime given that these are the published quanta. Thoughts?

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 21 October 2021 14:10  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road Jules Briefing

Thanks [REDACTED]

This looks good (background due diligence exercise notwithstanding).

My only comment would be, do you think the table might be clearer if we added market discount as a distinct column? Then perhaps we could just use the asterisks to explain the further nuances?

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>

**Sent:** 21 October 2021 13:35

**To:** [REDACTED] <[REDACTED]@london.gov.uk>

**Subject:** Pope's Road Jules Briefing

Hi [REDACTED]

Please find attached the slides from today's briefing for Jules with a comparison slide at the end. Care to have a glance over it before I send it off to Jules?

Best,

[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 21 October 2021 13:31  
**To:** [REDACTED]  
**Subject:** RE: Pope's Road - PPA?

Hi [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [Regulation 12 (4)(e)]

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**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 21 October 2021 12:55  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Pope's Road - PPA?

Hi [REDACTED]

[REDACTED] wants to have a look at the Pope's Road PPA. Can't seem to find anything in the S Drive folders – any idea where else to look?

Best,

[REDACTED]

**Senior Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
169 Union Street, London, SE1 0LL



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Thanks

© 2005 Blackwell Publishing Ltd

Hi [REDACTED]

Fitted the briefing we sketched out into the proper template for Jules' planning meeting.

Deadline for agenda items was technically on Friday – hopefully there's some wiggle room there.

Best,

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 15 October 2021 16:15  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road - Draft Jules briefing

Hi [REDACTED]

This all looks good to me. As you say, probably useful to have the objections somewhere to hand.

\_\_\_\_\_

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 15 October 2021 16:06  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Pope's Road - Draft Jules briefing

Hi [REDACTED]

Have started sketching out a briefing note for Jules on Pope's Road, which is attached. Before I translate it into a format that's more official (or visually palatable) thought you might want to give it a glance over. The first two pages are the important bits, the objections I mostly included for my own cross referencing.



**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**  
169 Union Street, London, SE1 0LL

## Agenda item

### Jules Planning Meeting

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<b>Prepared by:</b>	
Title Extension	Senior Strategic Planner, Development Management
<b>Meeting Date:</b>	21 October 2021
<b>Item:</b>	Pope's Road
<b>Format:</b>	Written briefing and verbal update
<i>Attached papers:</i>	
<b>Purpose</b>	To provide an update on the implications of height reductions on the proposed scheme and an update on conversations around the proposed public benefits package.

#### **Body of Briefing**

At Stage 2 it was established that owing to the proposed building's dimensions and the prevailing heights in the area, the proposed building would be clearly visible above established rooflines and impact nearby heritage assets. At this stage, GLA officers were of the view that the harm to the Brixton Conservation Area, Grade II\* Listed St. Matthew's Church, Grade II Listed Brockwell Park and Gardens would be less than substantial. Following the Mayoral call-in of the scheme, officers asked the applicant to undertake a heights study, which would examine the impact of reducing the height of the building on the nearby heritage assets and public benefits package.

A heights study was subsequently undertaken, the result of which is displayed below in Table 1. In sum, the heights study concluded that the public benefits afforded by the scheme would be greatly reduced should the proposed height be reduced from 20- to 18-storeys, and the scheme would be undeliverable below 18-storeys.



Table 1 - Result of the Pope's Road heights study

	20 storeys	18 storeys	16 storeys	14 storeys
			<b>Not deliverable</b>	
New public toilets	Yes (equivalent to £500k)	--	--	--
Public square + art	£1M + delivery	£300,000	--	--
Community floorspace	2140 sq ft NIA	--	--	--
Developer outreach programme	Yes	--	--	--
Hondo community officer	Yes	--	--	--
Lambeth community officer	£90k	--	--	--
Affordable workspace	24,767 sq ft NIA (12.5%)	18,696 sq ft NIA (10%)	--	--
Job uplift	1800	1620	--	--
Employment and training contribution	£1,875,000 (over 25 years)	£579,681 (one payment)	--	--

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The applicant explained that establishing a *critical mass* of floorspace in the building is central to the viability of the project. The logic behind the critical mass theory was explained thusly:

- As Brixton is not an established office location, an *office ecosystem* must be created to generate an attractive and viable office development.
- This ecosystem would be comprised of a large anchor tenant, established medium sized enterprises (25-100 people), serviced workspace suitable for SMEs, and affordable workspace.
- The applicant has calculated that based on the floorspace requirements for each of the ecosystem components that the ideal mass would be 275,000 sq. ft. and the minimum/critical mass would be 200,000 sq. ft. This figure is partly based on similar schemes wherein an office ecosystem style development was introduced into an atypical commercial location, such as:
  - Angel Building by Derwent London – refurbishment project to develop 268,000 sq. ft. of office and retail in Angel
  - Aldgate Tower by Aldgate Developments – new development of 320,000 sq. ft. of office and retail in Aldgate

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- White Collar Factory by Derwent London – new development of 291,000 sq. ft. of office, residential, and retail in Old Street
- Brunel Building by Derwent London – new development of 243,000 sq. ft. of office and retail in Paddington

Officers have also engaged with Historic England since the scheme was called in. Historic England are of the opinion that even if the height of the building was reduced to 16 or 14 storeys, given the low prevailing heights in the area the development would still result in considerable harm to heritage assets.

Considering that a height reduction which fully resolves heritage concerns would render the building ~~unviable/undeliverable as far as the applicant is concerned~~ and a ~~viable-minor~~ height reduction would not resolve heritage concerns and would seemingly disproportionately negatively impact the public benefits offer, [REDACTED]

**Commented [REDACTED]:** Note, we can't use this term because we haven't viability tested the scheme.

[Regulation 12 (4)(e)]

The public benefits offer prior to the mayoral call-in can be summarised thusly:

- Provision of 2,400 sq.m. affordable workspace at discount 50% on market rates;
- Employment and training contribution to provide an ongoing financial benefit to local employment and training initiatives. This would include a £150,000 upfront contribution payment following the commencement of the development and then an annual index linked payment of £56,000 for 25 years following the occupation of the development
- Workspace Strategy
- Local Labour initiatives to target 25% in both construction and end use phases
- Public Realm Design Scheme comprising: new public square, retention and reconfiguration and potential increase of market pitches on Pope's Road, to be delivered by the applicant.
- New public toilet block within development
- Public Art - the celebration and integration of the Michael Johns mural and identification of opportunities for other public art as part of Public Art Strategy together with a £80,000 contribution towards public art.
- Community and Commercial Use Strategy to include: Local community access to full range of on-site facilities in perpetuity, appointment of a Local Community Partner Lead and steering group, Frequent communications and publicity of opportunities available to the local community within the development, meanwhile/pop-up strategy to outline efforts made toward local businesses, community access to free or discounted meeting rooms and spaces, dedicated community space and programming for the local community, and social value monitoring to be published annually;
- A contribution of £15,000 toward legible London wayfinding signage;
- A contribution of £300,000 towards improvements to walking and cycling routes;

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- A contribution of £220,000 towards a new cycle hire docking station and cycle hire membership;
- A contribution of £300,000 towards Brixton Rail Station improvement works
- A contribution of £450,000 towards improvements to bus services in the area
- Carbon offset contribution

Following further discussion in the context of heritage impact and departure from Policy D9 within the now adopted London Plan, the applicant is considering minded to agree the following additional benefits:

- Extending the term of the Affordable Workspace to 2090 to match the term of the developer's lease with Network Rail
- Establishing a new GLA Brixton job training fund of £1,000,000 (£40,000 per annum for a period of 25 years) in addition to the London Borough of Lambeth employment and skills endowment fund
  - The applicant proposes that this new training fund focuses on Coldharbour Ward and includes direct allocations that invest in employment and skills training targeted at the improvement of employment prospects for local youth in the BAME communities, arising directly from the development and the surrounding regeneration of Brixton Central.
  - It is anticipated that the investment would be part of a joint initiative between Hondo, the GLA, and Lambeth, with the main objective of linking the development to the eco system, Employment & Skills training, Affordable Workspace and the proposed community outreach programme, helping to ensure that new jobs created by this development and the immediate surroundings including Brixton Central regeneration, can be accessed by local people, particularly youth groups.
  - In conjunction with Lambeth, the objective would be to make sure these opportunities are widely accessible to the local community and we envisage these jobs being publicised via various channels, for example through engagement with local Ward Councillors, Community Groups within the area, the Community Development Group set up as part of the section 106 Agreement.
- In addition to the number of apprenticeships already agreed, the applicant would provide an additional 50% for apprenticeship opportunities during the occupation stage. Those additional apprenticeships would be targeted specifically for BAME communities.
  - The applicant is proposing to link in with companies like the Black Seed Fund who can help to provide access to these employment opportunities but has not yet defined the nature of this link.
  - The applicant is proposing to channel the training into on-site opportunities which could potentially include building management, community and the affordable workspace provider but has not yet provided details about how this would happen.



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- The applicant acknowledges that they cannot control tenant job training policy, however they would seek to use reasonable endeavours to encourage tenants to adhere to the obligations and look to set potential criteria for use of this space for businesses focusing on local employment – again, no further detail has been provided.

GLA officers have also asked Lambeth officers to consult internally to advise whether there are other local projects that this scheme may be able to link into, such as a comprehensive waste collection strategy for the local markets. This information is still forthcoming.

GLA officers have also reviewed the objections to the scheme and have identified some which may be germane to consideration of the above. They are:

- The facilities provided by the development are not aligned with the expectations and needs of the local community and will undermine existing small businesses and traders
- The proposals would result in increased rents and will displace existing local small businesses
- The development would lead to greater gentrification in Brixton
- The development does not address disproportionate adverse impact on BAME communities in Brixton

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 19 October 2021 13:37  
**To:** [REDACTED]  
**Cc:** [REDACTED] John Finlayson; Lucinda Turner; Planning Support  
**Subject:** RE: AGENDA ITEM REQUEST for Jules Planning Meeting on Thursday 21st October 2021  
**Attachments:** Planning Briefing Note - Popes Road.doc

Hi [REDACTED]

Apologies – bit of a late addition but hopefully the attached can make it onto the agenda for this Thursday's meeting. The briefing is concerning the Pope's Road call-in and the briefing note is attached.

Best,  
[REDACTED]

---

**From:** [REDACTED]@london.gov.uk>

**Sent:** 15 October 2021 09:48

**To:** [REDACTED]

**Subject:** AGENDA ITEM REQUEST for Jules Planning Meeting on Thursday 21st October 2021

**AGENDA ITEM REQUEST for Jules Planning Meeting on Thursday 21<sup>st</sup> October @ 10.00-12.00**

Please could you complete the attached template for any item you want on the agenda for this week's Jules' Planning Issues meeting (and cc Lucinda Turner and [planningsupport@london.gov.uk](mailto:planningsupport@london.gov.uk)) by **COP today**. When completing the attached template, please indicate if your item will be verbal or written and the purpose or general steer being sought.

**Item titles that are not received by the deadline will go on the agenda for the 4<sup>th</sup> November.**

For any written items/report, please ensure you send the final written item/report to me by **4pm Tuesday**.

The final agenda and associated items/reports will be circulated on Wednesday.

The meeting will take place over Microsoft Teams.

Thank you,  
[REDACTED]

[REDACTED]

---

**From:**

**Sent:**

[REDACTED]  
19 October 2021 11:55

**To:**

**Cc:**

**Subject:**

[REDACTED]  
Pope's Road Background

**Attachments:**

6774 Stage 2 report rerun FINAL.pdf; Pope's Road GLA Height Study Addendum.pdf; Popes Road Letter (003).pdf; Planning Briefing Note - Popes Road.doc; 5276 Stage 1 report FINAL.pdf

Hi [REDACTED]

Here is the background info for Pope's Road.

S Drive folder: S:\Planning Decisions\Cases\Cases\5276

- Submission docs can be found here: S:\Planning Decisions\Cases\Cases\5276\Stage 1\docs\FINAL SUBMISSION DOCS

Attached are:

- Stage 1 and 2 reports
- Applicant's height study addendum
- Applicant's market analysis
- Briefing note for Jules

If there's anything else you want to look at/can't find let me know!

Best,

[REDACTED]  
**Senior Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
169 Union Street, London, SE1 0LL



6<sup>th</sup> August 2021



**Strictly Private & Confidential**

## **The Proposed Development at Pope's Road, SW4**

Dear Sirs,

We have pleasure in setting out the conclusions of our review of the proposed scheme at Pope's Road, in the context of advising what we feel is required in order to ensure that the scheme is commercially sustainable.

In undertaking this review, we believe that it is important that we give consideration to both the Pope's Road site in question, along with the wider Brixton Central area, and associated office market / provision.

The site presents an opportunity to create a new best in class building that will enhance the local area and provide businesses of all sizes an opportunity to work in Brixton, in turn providing positive social impact for the community.

### **Brixton Office Market**

Brixton is located a short tube journey from the West End and is strategically located to benefit from the strength of the ever footloose central London office market. However, it has significantly lower office stock in comparison to more mature neighbouring London boroughs, and the stock that exists consists of mainly outdated, smaller buildings, not fit for modern occupiers and working trends. There are currently few options for any size of business that would like to consider office space in Brixton.

Current office stock in the Brixton office market stands at just 7% of built stock with a vacancy rate of only 2%. The largest office buildings include Squire and Partners' headquarters at Ferndale Road, which they developed for their own occupation, the Lambeth Civic Centre, Blue Star House and International House, the co-working space run by 3space. The net effect is that the significant majority of office occupiers in Brixton are small businesses seeking value.

With an historic lack of marketing investment, Brixton is not currently considered to be a bona fide London office market, its stock only rising recently as a result of Squire & Partners' office launch and the visitors attracted by it. Notwithstanding the potential redevelopment of Blue Star House, there remains a major opportunity to build on this recent success with further local office development.

In our opinion, in order to create a commercial office ecosystem that supports businesses at every stage of their life cycle (*rather than running the risk of seeing growing businesses migrate to large sub-markets across central London due to a lack of viable options to stay*), it is essential that the scheme is of a sufficient critical mass to accommodate a diverse range of occupiers. If achieved, Pope's Road can be the catalyst for a major change to the Brixton office market, kickstarting the office regeneration, including the potential redevelopment of other local sites, including Pop Brixton and International House, with further positive agglomeration effects for the local community.

## Scheme Analysis

The 20 storey scheme provides an opportunity to secure large established tenants to Brixton, and to change the occupier mix in an under supplied market as well as support small and medium businesses.

**It is this diversity of occupiers that Savills strongly recommends is embraced and facilitated by the optimal scheme at Pope's Road, offering a variety of sizes for all types of businesses. The types of businesses / tenants that will need to be facilitated in order to help create this ecosystem, along with their broad requirements, are set out below;**

### **1. Large (Anchor) Tenants**

The size of the building creates the opportunity to secure an established office occupier that will put Brixton on the map as a London office location. Occupier demand remains strong in London and a number of high profile tenants have office requirements of 100,000 sq ft + over the next 2-3 years. Savills research demonstrates that the average current size of large office requirements (50,000 sq ft +) averages 109,607 sq ft across Central London with key search criteria being:

- Character
- Amenity
- Scale
- Building Quality

The types of organisations that could fall into this category include fashion brands, tech/media companies or pioneering professional occupiers.

Typically these larger tenants would look to take floorplates of c.16-18,000 sq ft plus. Unfortunately the site constraints do not allow for the development to facilitate significant floorplates of this size. However, due to the quality of the scheme, we feel that it should be possible to create a commensurate product, but the floors would need to be a minimum of 8,000 sq ft with soft spots for interconnecting staircases, realistically in clusters of two. The impact would be an overall reduction in the net lettable area of the office accommodation, which is not ideal, but we feel would still be of interest to this type of tenant.

The current ground floor entrances to both buildings are interesting in the way they integrate the office with the market amenity, in a way which is not corporate, and therefore would be seen as being "of Brixton". However, they are relatively small, given the size of the upper parts. It is therefore expected that the lower office floor, or at least a major part thereof will need to be given over to the amenity and wellness facilities essential to all modern office occupiers. Receptions are no longer simply regarded as a conduit into and out of a building; modern occupiers regard them as a valuable amenity that complements their own office space and corporate identity.

Occupiers will want an enlarged reception and a club lounge on the lowest office level to improve the sense of scale of the building. Incorporating a café/breakout space as well as potentially communal meeting rooms within the reception allows tenants to be flexible within the building, with collaborative breakout space, away from their office floor. We are relying on this type of amenity to secure these tenants.

The inclusion of the bike store adds to this amenity and should further be complemented by high quality shower, changing and locker facilities. The importance of these facilities should not be under-estimated and is routinely

examined by potential occupiers, particularly in light of the pandemic. It is encouraging to see that space is already dedicated to this.

From the designs we have reviewed, the building will meet a high standard in commercial office space design and delivers the scale to satisfy large occupiers. We believe the massing at 20 storeys, including the feature uppermost floor space, which typically attracts the decision makers of those companies to the building, offers standout character and profile to attract large occupiers.

The importance of the uppermost floors (19<sup>th</sup>-20<sup>th</sup>) should not be underestimated. This workspace acts as the catalyst for the overall scheme and generates a disproportionate amount of the building's value, given that typically the highest rents are ascribed to the upper floors given superior views and prestige, in turn enabling the delivery of the affordable workspace and the ability to subsidise deals for target small and medium occupiers.

Notwithstanding the above, it would be a missed opportunity to target these occupiers in isolation. As Savills have experienced at King's Cross on behalf of Argent, and Battersea have experienced with Apple, attracting a large anchor office tenant will also attract small and medium-sized organisations. It is essential that the scheme is able to accommodate these occupiers and can embrace the principles of Lambeth's Creative Enterprise Zone.

## ***2. Established Medium-Size Enterprises***

Attracting a large, anchor, occupier is a key aim as it help puts the local office market in the spotlight. However, incorporating office space that can accommodate medium-sized businesses is equally important as it creates a diverse tenant mix, a further scaling opportunity for occupiers and, ultimately, diversifies risk for the scheme and sub-market.

There are currently no high quality offices in Brixton to support businesses of 25-100 people. Offering a proportion of the tower floors to occupiers will mean that businesses can grow organically, and crucially will not be forced to leave Brixton.

## ***3. Serviced offices***

Buildings of 150,000 sq ft + increasingly have a serviced office provider in the building, offering tenants project space, growth opportunities and extra facilities for meetings/events. It will also be an important draw for those anchor tenants who would take large quantity of spaces in the building. In addition, and most importantly, they offer small businesses (1-25 people) high quality workspace in the area. There are a number of high quality providers who would like to take space in this location.

The average size in sq ft for a serviced office provider letting in the West End over the last 5 years has been approximately 27,000 sq ft, mainly because they struggle to maintain a healthy margin at below approximately 25,000 sq ft. We would expect a slight increase on this in the fringe submarkets.

We strongly recommend delivering a minimum space of c.30,000 sq ft for serviced offices, enabling small local and wider London businesses to participate in this exceptional building.



#### **4. Affordable Workspace**

The scheme design, incorporates an area equivalent to 12.5% of the office area that can be dedicated to Affordable Workspace, to meet local demand by SMEs for co-working. It is assumed that the start-up and incubator type facilities that we understand are likely to come forward on the Pop site and International House, would benefit from this affordable workspace provision, and as such become a key contributor to the overall eco-system we described earlier.

This would comfortably sit alongside a traditional serviced office provider as is more likely to offer co working collaborative spaces with the serviced office providers providing private office space for businesses as they mature.

#### **Critical Mass**

The best way to understand what, and how much, to deliver going forward is to look back at precedent developments.

Meaningful single-building placemaking schemes that have transformed central London sub-markets are as follows:

- Angel Building by Derwent London (Angel/Islington) – 268,000 sq ft refurbishment including offices and retail uses
- The Shard by REM (Southbank) – 589,000 sq ft of offices within a 4m sq ft new development including offices, residential, hotel and retail uses
- Aldgate Tower by Aldgate Developments (Aldgate) – 320,000 sq ft new development including offices and retail uses
- White Collar Factory by Derwent London (Old Street) – 291,000 sq ft new development including offices, residential and retail uses
- Brunel Building by Dewent London (Paddington) – 243,000 sq ft new development including offices and retail uses
- 1 Westfield Avenue by Lendlease (Stratford) – 550,000 sq ft new development including offices and retail uses
- Battersea Power Station by BPSDC (Battersea) – 500,000 sq ft of offices within a 2m sq ft new development including offices, residential and retail uses

The average size of these developments is 394,000 sq ft. Even accounting for the outliers of Battersea, Southwark and Stratford, the average is 281,000 sq ft, suggesting that the optimal massing for Pope's Road – a bona fide single-building scheme – is c.275,000 sq ft. Moreover, it suggests that anything less than 200,000 sq ft would be materially inadequate to establish the necessary critical mass.

## Conclusion

Taking into account an average large scale office requirement of c.110,000 sq ft, 30,000 sq ft for serviced offices and c.25,000 sq ft (12.5%) of affordable workspace this would leave approximately 27,000 sq ft of office accommodation over 4 floors available for medium sized occupiers, assuming a wellness space/reception of approximately 8,000 sq ft.

Moreover, of critical importance to attracting a large occupier(s), and therefore the overall success of the scheme, is the delivery of the uppermost floors within the building. These highly aspirational floors act as the catalyst for the leasing campaign by attracting the decision-makers of large businesses. Moreover, they generate the highest rents and therefore a disproportionate amount of the value which enables the delivery of the affordable workspace and the ability to subsidise target small and medium occupiers.

To achieve these four target tenant types as well as offer best in class amenities, the proposed 200,000 sq ft office scheme, provides a quantum that is satisfactory to achieve the optimal tenant mix for the start of Brixton's office regeneration, although would ideally be larger.

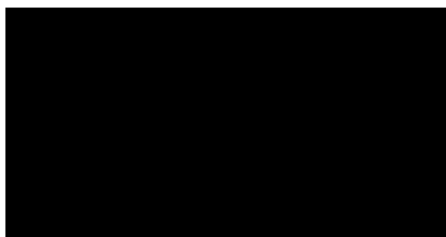
In this respect, precedent development schemes across London that can be considered to have been 'placemaking' in nature are Derwent London's Angel Building, REM's The Shard, Derwent London's White Collar Factory, Aldgate Developments' Aldgate Tower, BPSDC's Battersea Power Station, Lendlease's 1 Westfield Avenue and Derwent London's Brunel Building. All of these schemes were materially in excess of 200,000 sq ft, delivering the mass required to reposition their respective sub-markets.

The proposed scheme, and scale, provides the opportunity to create an office ecosystem which would be attractive to all stages of business cycles. This would be immensely beneficial to the Brixton office market, economy and the wider town centre economy.

## Summary

- The local market is under supplied of office stock and there is an opportunity to build on this and grow this office sub-market.
- In order to create a sustainable recognisable office destination, it is essential that a critical mass is achieved, that facilitates a wide range of tenant types and sizes, as well as providing the associated amenities that would be required.
- The scheme is well designed and will satisfactorily meet the needs of a varying tenant mix, although would ideally be larger.
- The size of building means that an eclectic mix of occupiers can benefit from best in class office accommodation in Brixton.
- We have every confidence that there will be strong demand for the finished scheme in its current form.

Yours faithfully,




UK Board Director, Savills (UK) Limited



## Agenda item

### Jules Planning Meeting

<b>Prepared by:</b>	
Title Extension	Senior Strategic Planner, Development Management
<b>Meeting Date:</b>	21 October 2021
<b>Item:</b>	Pope's Road
<b>Format:</b>  <i>Attached papers:</i>	Written briefing and verbal update
<b>Purpose</b>	To provide an update on the implications of height reductions on the proposed scheme and an update on conversations around the proposed public benefits package.

### **Body of Briefing**

At Stage 2 it was established that owing to the proposed building's dimensions and the prevailing heights in the area, the proposed building would be clearly visible above established rooflines and impact nearby heritage assets. At this stage, GLA officers were of the view that the harm to the Brixton Conservation Area, Grade II\* Listed St. Matthew's Church, Grade II Listed Brockwell Park and Gardens would be less than substantial. Following the Mayoral call-in of the scheme, officers asked the applicant to undertake a heights study, which would examine the impact of reducing the height of the building on the nearby heritage assets and public benefits package.

A heights study was subsequently undertaken, the result of which is displayed below in Table 1. In sum, the heights study concluded that the public benefits afforded by the scheme would be greatly reduced should the proposed height be reduced from 20- to 18-storeys, and the scheme would be undeliverable below 18-storeys.

**Table 1 - Result of the Pope's Road heights study**

	20 storeys	18 storeys	16 storeys	14 storeys
			<b>Not deliverable</b>	
New public toilets	Yes (equivalent to £500k)	--	--	--
Public square + art	£1M + delivery	£300,000	--	--
Community floorspace	2140 sq ft NIA	--	--	--
Developer outreach programme	Yes	--	--	--
Hondo community officer	Yes	--	--	--
Lambeth community officer	£90k	--	--	--
Affordable workspace	24,767 sq ft NIA (12.5%)	18,696 sq ft NIA (10%)	--	--
Job uplift	1800	1620	--	--
Employment and training contribution	£1,875,000 (over 25 years)	£579,681 (one payment)	--	--

The applicant explained that establishing a *critical mass* of floorspace in the building is central to the viability of the project. The logic behind the critical mass theory was explained thusly:

- As Brixton is not an established office location, an *office ecosystem* must be created to generate an attractive and viable office development.
- This ecosystem would be comprised of a large anchor tenant, established medium sized enterprises (25-100 people), serviced workspace suitable for SMEs, and affordable workspace.
- The applicant has calculated that based on the floorspace requirements for each of the ecosystem components that the ideal mass would be 275,000 sq. ft. and the minimum/critical mass would be 200,000 sq. ft. This figure is partly based on similar schemes wherein an office ecosystem style development was introduced into an atypical commercial location, such as:
  - Angel Building by Derwent London – refurbishment project to develop 268,000 sq. ft. of office and retail in Angel
  - Aldgate Tower by Aldgate Developments – new development of 320,000 sq. ft. of office and retail in Aldgate

- White Collar Factory by Derwent London – new development of 291,000 sq. ft. of office, residential, and retail in Old Street
- Brunel Building by Derwent London – new development of 243,000 sq. ft. of office and retail in Paddington

Officers have also engaged with Historic England since the scheme was called in. Historic England are of the opinion that even if the height of the building was reduced to 16 or 14 storeys, given the low prevailing heights in the area the development would still result in considerable harm to heritage assets.

Considering that a height reduction which fully resolves heritage concerns would render the building undeliverable as far as the applicant is concerned and a minor height reduction would not resolve heritage concerns and would seemingly disproportionately negatively impact the public benefits offer,

[Regulation 12 (4)(e)]

The public benefits offer prior to the mayoral call-in can be summarised thusly:

- Provision of 2,400 sq.m. affordable workspace at discount 50% on market rates;
- Employment and training contribution to provide an ongoing financial benefit to local employment and training initiatives. This would include a £150,000 upfront contribution payment following the commencement of the development and then an annual index linked payment of £56,000 for 25 years following the occupation of the development
- Workspace Strategy
- Local Labour initiatives to target 25% in both construction and end use phases
- Public Realm Design Scheme comprising: new public square, retention and reconfiguration and potential increase of market pitches on Pope's Road, to be delivered by the applicant.
- New public toilet block within development
- Public Art - the celebration and integration of the Michael Johns mural and identification of opportunities for other public art as part of Public Art Strategy together with a £80,000 contribution towards public art.
- Community and Commercial Use Strategy to include: Local community access to full range of on-site facilities in perpetuity, appointment of a Local Community Partner Lead and steering group, Frequent communications and publicity of opportunities available to the local community within the development, meanwhile/pop-up strategy to outline efforts made toward local businesses, community access to free or discounted meeting rooms and spaces, dedicated community space and programming for the local community, and social value monitoring to be published annually;
- A contribution of £15,000 toward legible London wayfinding signage
- A contribution of £300,000 towards improvements to walking and cycling routes

- A contribution of £220,000 towards a new cycle hire docking station and cycle hire membership
- A contribution of £300,000 towards Brixton Rail Station improvement works
- A contribution of £450,000 towards improvements to bus services in the area
- Carbon offset contribution

Following further discussion in the context of heritage impact and departure from Policy D9 within the now adopted London Plan, the applicant is minded to agree the following additional benefits:

- Extending the term of the Affordable Workspace to 2090 to match the term of the developer's lease with Network Rail
- Establishing a new GLA Brixton job training fund of £1,000,000 (£40,000 per annum for a period of 25 years) in addition to the London Borough of Lambeth employment and skills endowment fund
  - The applicant proposes that this new training fund focuses on Coldharbour Ward and includes direct allocations that invest in employment and skills training targeted at the improvement of employment prospects for local youth in the BAME communities, arising directly from the development and the surrounding regeneration of Brixton Central.
  - It is anticipated that the investment would be part of a joint initiative between Hondo, the GLA, and Lambeth, with the main objective of linking the development to the eco system, Employment & Skills training, Affordable Workspace and the proposed community outreach programme, helping to ensure that new jobs created by this development and the immediate surroundings including Brixton Central regeneration, can be accessed by local people, particularly youth groups.
  - In conjunction with Lambeth, the objective would be to make sure these opportunities are widely accessible to the local community and we envisage these jobs being publicised via various channels, for example through engagement with local Ward Councillors, Community Groups within the area, the Community Development Group set up as part of the section 106 Agreement.
- In addition to the number of apprenticeships already agreed, the applicant would provide an additional 50% for apprenticeship opportunities during the occupation stage. Those additional apprenticeships would be targeted specifically for BAME communities.
  - The applicant is proposing to link in with companies like the Black Seed Fund who can help to provide access to these employment opportunities but has not yet defined the nature of this link.
  - The applicant is proposing to channel the training into on-site opportunities which could potentially include building management, community and the affordable workspace provider but has not yet provided details about how this would happen.



- The applicant acknowledges that they cannot control tenant job training policy, however they would seek to use reasonable endeavours to encourage tenants to adhere to the obligations and look to set potential criteria for use of this space for businesses focusing on local employment – again, no further detail has been provided.

GLA officers have also asked Lambeth officers to consult internally to advise whether there are other local projects that this scheme may be able to link into, such as a comprehensive waste collection strategy for the local markets. This information is still forthcoming.

GLA officers have also reviewed the objections to the scheme and have identified some which may be germane to consideration of the above. They are:

- The facilities provided by the development are not aligned with the expectations and needs of the local community and will undermine existing small businesses and traders
- The proposals would result in increased rents and will displace existing local small businesses
- The development would lead to greater gentrification in Brixton
- The development does not address disproportionate adverse impact on BAME communities in Brixton

**POPE'S ROAD****AUGUST 2021**Addendum to Popes Road GLA Height Study

In July 2021, we submitted a paper to the GLA in response to a question about the impact of reducing the height of the tower in the Popes Road regeneration scheme. Our response set out the background to the project and how the fundamental aim of the brief was to create an office ecosystem. We explained how that was based on a minimum 200,000 sq ft office component and that the scheme which Lambeth resolved to grant in November had been carefully negotiated to sit at the minimum critical mass for the ecosystem and deliver a wide range of social, economic and environmental benefits. These benefits had been devised to ensure that in Lambeth's consideration of the application that the benefits decisively outweighed their conclusion on harm to the setting of heritage assets.

You have now asked us to explain how the change in benefits between the 18 and 20 storey versions are rationalised. It is suggested that there is a disproportionate reduction in benefits between the two versions.

The July 2021 document did not set out a proposed reduction in benefits. The document did explain how the office ecosystem would be imperilled by any reduction in height. This results from the actual shrinkage of the floorspace and the ecosystem. Whilst we did not table a public benefits offer with the 18 storey version it is our firm opinion that the loss of benefits would be significant. The reason the loss of benefits would be significant is that there is immense value in the top two floors. This would be the most valuable coveted space in the scheme and would represent a significant loss of value and profit.

To assist this response, we have returned to Savills whose London office agency team provided the original advice on the ecosystem and critical mass as well as configuration and development input. It is their view that the profit on cost of the top two floors is about £ 5.6 Million. During the negotiations with Lambeth we agreed a number of significant benefits "beyond planning policy". These included a new public square (£1million; new public toilets (£500,000); employment skills endowment (£1million more than the policy compliant contribution); the community space (£1.25 million) and affordable workspace at 12.5% (the extra 2.5% being worth about £2.5 million). The total value of the "beyond planning policy" benefits is £6.25 M. The value of the community space and affordable workspace package alone would be over half the expected profit of the two most profitable floors in the entire development. This "beyond policy" could not be sustained if the scheme shrank by two floors.

In return, the visibility of the development would be reduced by two floors. Nevertheless, the building would continue to be visible in the same views identified by Lambeth to cause harm to the setting of heritage assets. It is clear from discussions with Lambeth that the threshold at which they concluded there is no harm at all is 14 storeys. At 18 storeys, it is our opinion there

would be no or nominal change to Lambeth's assessment of heritage harm but there would be a substantial loss of benefits (likely to be all or a good proportion of the "beyond planning policy" items) because of the value of the top two floors. A modest if any change to harm combined with a significant reduction benefits would lead to a new planning balance. The planning balance in our view was crucial to Lambeth's decision making. We contend that this new planning balance (18 storeys with many or all "beyond planning policy" benefits gone) would move the dial markedly and arguably fatally in the wrong direction. Such a movement would be to the disadvantage of the local community and the opportunity to create the office ecosystem.

END

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 October 2021 11:26  
**To:** [REDACTED]  
**Subject:** RE: Questions regarding Pope's road hearing (Ref. Stage 3 (called-in) - 2021/0265)

Hi [REDACTED]

Yes, it is our intention is to hold all future hearings as 'hybrid'. Legally speaking the decision maker must be in the room and we must make provision (within reasonable restrictions such as capacity) for any speakers or members of public to attend in person should they wish to do so.

I don't know specific details of how this would happen as I'm waiting to find out what the Crystal facilities are.

Thanks

[REDACTED]

**Planning Support Manager, Planning**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
[REDACTED]

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[REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 15 October 2021 11:21  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** FW: Questions regarding Pope's road hearing (Ref. Stage 3 (called-in) - 2021/0265)

H [REDACTED]

Any idea whether future call-in hearings will allow remote speakers?

Best,

---

**From:** [REDACTED]  
**Sent:** 15 October 2021 10:55  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Re: Questions regarding Pope's road hearing (Ref. Stage 3 (called-in) - 2021/0265)

Dear [REDACTED]

Many thanks for your very useful reply.



As you say its not anticipated that the public hearing would be hybrid, presumably that means that it would be a physical meeting. In that case, would speakers be allowed to make their contributions remotely- ie via zoom/MS Teams? Or would it be required that they attend in person?

Many thanks in advance.

Best wishes

[REDACTED]

On Thu, 7 Oct 2021 at 16:11, [REDACTED] <[REDACTED][\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)> wrote:

Dear [REDACTED]

Thank you for your email of 21 September and hope you are well.

Please find below, in bold typeface, answers to your queries regarding the representation hearing procedure.

1. You asked whether the applicant would be given the opportunity to submit changes to the application before the hearing takes place. **Yes, the applicant does have the opportunity to submit changes prior to the hearing.**
2. You asked whether any changes made to the application by the applicant would be made publicly available. **Yes, should the applicant submit changes those will be made publicly available on the [GLA website](#).**
3. You asked how long the public will have to read through any proposed changes before making written representations. **The typical consultation period for submitted changes is 21 days.**
4. You asked, referring to paragraph 5.2 of the hearing procedure, whether individuals who did not make written representations prior to the Mayoral call-in would be able to do so now and be allowed to speak at the hearing. **Yes, they would; however, please do note that as set out in paragraph 5.3 of the hearing procedure making representations does not guarantee one the ability to speak at the hearing. Furthermore, as noted in paragraph 5.6, all those who are both eligible and wish to speak at the hearing must submit a detailed written statement no later than 14 days prior to the hearing.**
5. You asked whether an organisation would be allowed to put forward more than one speaker at the hearing. **As noted in paragraphs 5.4 and 5.5 of the hearing procedure, a maximum of 15 minutes is allotted for oral representations from objectors. It will be up to objectors (collectively) to decide amongst themselves how to allocate their allotted speaking time between individual speakers.**
6. You asked about the deadline for making representations. **The consultation response deadline with respect to any revisions to the development proposal will be clearly stated as part of the public consultation process. Whilst representations received outside of any formal consultation processes will still be reported and considered, we would always encourage representations to be made in a timely manner and adherence to formal consultation deadlines.**
7. You asked about guidance in the event the hearing is a hybrid meeting. **It is not anticipated that the hearing will be a hybrid meeting. Should this change, suitable guidance will be published.**

Also, for clarity a copy of the hearing procedure document referenced above is available [here](#).

I hope the above has addressed your queries.

Kind regards,

[REDACTED]

[REDACTED]

**Senior Strategic Planner, Development Management**

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169 Union Street, London, SE1 0LL

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[REDACTED] [london.gov.uk](https://london.gov.uk)

My pronouns are: [REDACTED]

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From: [REDACTED]

Sent: 05 October 2021 09:41

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: Lucinda Turner <[REDACTED]@london.gov.uk>; John Finlayson <[REDACTED]@london.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@london.gov.uk>

Subject: Re: Questions regarding Pope's road hearing (Ref. Stage 3 (called-in) - 2021/0265)

Dear [REDACTED]

We would be very grateful if you could respond as soon as possible to our email of 21 September regarding the guidelines for the public hearing.

Many thanks

[REDACTED]

[REDACTED]

On Tue, 21 Sept 2021 at 11:06, [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)> wrote:

Hi [REDACTED]

Thank you for your email.

The GLA case officer dealing with the representation hearing is now [REDACTED] (cc'd) who will be able to respond to your queries

Kind regards

[REDACTED]

[REDACTED]

[REDACTED] Planning

GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

[www.london.gov.uk/what-we-do/planning](http://www.london.gov.uk/what-we-do/planning)









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**From:** 

**Sent:** 21 September 2021 10:57

**To:** Lucinda Turner  John Finlayson  >  
 < [london.gov.uk](mailto:london.gov.uk)>;  < [london.gov.uk](mailto:london.gov.uk)>;   
 [a@london.gov.uk](mailto:a@london.gov.uk)>

**Cc:** 

**Subject:** Questions regarding Pope's road hearing (Ref. Stage 3 (called-in) - 2021/0265)

Dear GLA officers,

I hope this email finds you well.

I am writing in relation to the upcoming public hearing on the Pope's Road case (Ref. Stage 3 (called-in) - 2021/0265)

I have been reading through the guidance for virtual representation hearings procedures (available on your website) in preparation for that and there are a few things that are not clear to me:

- 1) Whether the applicant (Hondo) will be given the opportunity to submit changes to the called-in application before the hearing takes place;
- 2) If that is the case, whether those changes will be made publicly available on the GLA website;
- 3) And how long will the public have for reading through those changes before making their written representation;
- 4) With reference to paragraph 5.2 of the procedure (see copied text below), whether individuals who did not make a written representation to the original planning application (ie before the application was called in by the Mayor) can make one now and be allowed to speak at the public hearing.

" 5.2. Individuals and organisations that have previously made written representations about the application either to the relevant London borough council or directly to the GLA will be eligible to request to speak (for the avoidance of doubt this does not include an individual who has signed a petition but would include an individual who has signed a standard letter)."



5) And if an organisation (e.g. a community group) makes a written representation that touches upon different topics, will they be allowed to have more than one speaker at the public hearing or it will be just one on behalf of the whole group?

6) The deadline for making a written representation - i.e. before the announcement of the hearing OR until the day of the hearing - to be considered by the Mayor in his decision.

7) The procedure guidance in case the hearing takes place as a hybrid meeting.

I would be really grateful if you could get back to me as soon as possible to submit the written representations on time and prepare well for the hearing.

With best wishes,

[Redacted]

[Redacted]

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 14 October 2021 11:03  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Pope's Road - tomorrow's meeting  
**Attachments:** BV Youth Employment Programme - Hospitality Sector FV.pdf; Black Seed - Investor deck July 2021 v1.0.pdf

Hi [REDACTED]

In addition to the below, please find attached some more information relating to the Black Seed fund which might be helpful to you.

I have also reattached the Youth Programme as some bits on the last page didn't make a huge amount of sense so I have just removed.

Thanks  
[REDACTED]

[REDACTED]  
Associate Director  
direct: 020 [REDACTED]  
mobile: [REDACTED]  
e-mail: [REDACTED]@dp9.co.uk

DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ  
telephone: 020 7004 1700 facsimile: 020 7004 1790 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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---

**From:** [REDACTED]  
**Sent:** 08 October 2021 16:23  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk> [REDACTED]@lambeth.gov.uk; [REDACTED]@lambeth.gov.uk; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Subject:** RE: Pope's Road - tomorrow's meeting

Dear [REDACTED]

Please find attached updated document setting out the Applicant's enhanced offer in response to consultation with the GLA officers (reattaching previous articles).

Kind regards  
[REDACTED]

██████████  
Associate Director

direct: 020 ██████████

mobile: ██████████

e-mail: ██████████ [dp9.co.uk](mailto:██████████@dp9.co.uk)

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---

**From:** ██████████ <██████████@[london.gov.uk](mailto:██████████@london.gov.uk)>

**Sent:** 28 September 2021 17:09

**To:** ██████████ <██████████@[dp9.co.uk](mailto:██████████@dp9.co.uk)>; ██████████ <██████████@[hondo-enterprises.com](mailto:██████████@hondo-enterprises.com)>; ██████████

<██████████@[dp9.co.uk](mailto:██████████@dp9.co.uk)>; ██████████ <██████████@[hondo-enterprises.com](mailto:██████████@hondo-enterprises.com)>

**Cc:** ██████████ <██████████@[london.gov.uk](mailto:██████████@london.gov.uk)>

**Subject:** Pope's Road - tomorrow's meeting

Hi all,

Have been reviewing notes from last week's meeting with a view to drafting an agenda for tomorrow and it seems some points remain outstanding. In particular, a written draft of the scope for an expanded public benefits package. We are poised and ready to have a discussion with Regeneration and Economic Development colleagues, but first need something concrete as a basis for discussions.

In view of this, might I suggest that we postpone tomorrow morning's meeting until we've received proposed benefits (or at least a draft scope) in writing and had the opportunity to discuss internally.

Best,

██████████

**Senior Strategic Planner, Development Management**

**GREATERLONDONAUTHORITY**

City Hall, The Queen's Walk, London SE1 2AA



## Introduction

This document sets out the Applicant's enhanced offer in response to consultation with the GLA officers about the impacts and benefits of the Popes Road scheme. This is fully cognizant of the concerns raised by the Mayor at the time of the Stage 2 recovery. Those concerns are focussed on the planning balance of harm identified by the GLA to heritage assets and the extent to which it is outweighed by the public benefits. This document builds upon the scheme that gained a resolution to grant by London Borough of Lambeth (LBL) in November 2020. It expands on the agreed Lambeth S106 package including types of employment programmes that the Applicant is looking to incorporate into the development.

The background is assumed to be familiar to those reading. The salient point is that this is a local regeneration scheme for Brixton with a substantial package of benefits associated with the scheme that Lambeth resolved to grant in November 2020.

## Proposed Offer

We propose negotiating a further enhanced package that seeks to build upon the jobs, skills, training and outreach programmes. The main areas for discussion are: -

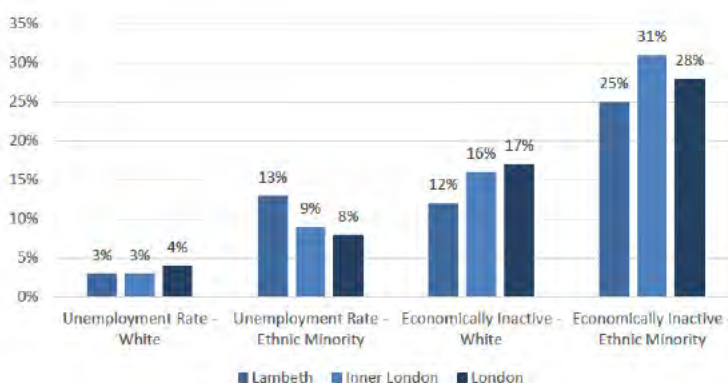
### 1. Affordable Workspace

- The term of the Affordable Workspace extended to 2090 to match the term of the developer's lease with Network Rail.

### 2. Brixton Job Training Fund

- Establish a new GLA Brixton job training fund of £1,000,000 (£40,000 per annum for a period of 25 years) in addition to the LBL employment and skills endowment fund.
- As of March, 2021<sup>1</sup>, Lambeth will be home to the most unemployed people in London, with 26,000 unemployed residents. The average number of unemployed residents in a London borough is around half the number of unemployed Lambeth residents.

- It can be seen from the adjacent graph that the unemployment rate for ethnically white LBL residents is significantly below that of minority ethnic residents (3% compared to 13%). When comparing to Inner London & London, the gap between unemployment rates for white and ethnic minority residents is larger within LBL (a 10-percentage point gap, compared to 6 percentage points in Inner London and 4 across London).



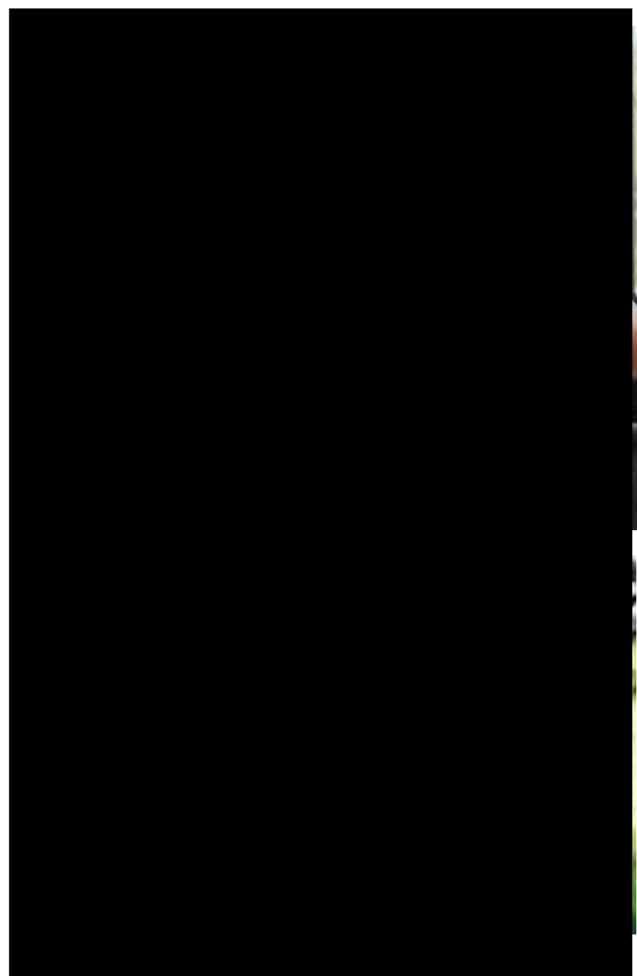
Source: ONS, 2019. Annual Population Survey

<sup>1</sup> A detailed Study of unemployment in London March 2021 (Volterra Partners LLP)





- As of Feb 2021, 5.7% of Lambeth 16- and 17-year-olds are Not in Education, Employment or Training (NEETs) compared to a London average rate of 4.0%, which means Lambeth has the 5th highest rate of London boroughs, after Haringey, Wandsworth, Lewisham and Southwark.<sup>2</sup>
- From undertaking research, it is evident that:
  - a. Coldharbour and Brixton are some of the most deprived parts of Lambeth
  - b. Employment is a strong driver of this deprivation
  - c. Ethnic minorities suffer more from unemployment than their white counterparts
  - d. Lambeth has a lot of children affected by income deprivation (poverty)
  - e. Lambeth has a high rate of young NEETs
- The above all points towards the value that improved opportunities for young and BAME communities could deliver for the borough, helping to address these long-standing socio-economic issues.
- We propose that this new training fund, focusing on Coldharbour Ward includes direct allocations that invest in employment and skills training targeted at the improvement of employment prospects for local youth in the BAME communities, arising directly from the development and the surrounding regeneration of Brixton Central.
- It is anticipated that the investment would be part of a joint initiative between Hondo, GLA and Lambeth, with the main objective of linking the development to the eco system, Employment & Skills training, Affordable Workspace and the proposed community outreach programme, helping to ensure that new jobs created by this development and the immediate surroundings including Brixton Central regeneration, can be accessed by local people, particularly youth groups. Examples of the sort of programmes that Hondo is currently involved in, in relation to the existing markets, and anticipate developing further as a direct result of the development include the:
  - The Brixton Village Youth Employment Programme which focusses on creating employment opportunities for young people refreshed annually, providing first job opportunities for up to 20 young people each year. Trialled in 2021, two local young people in their first year of college working in hospitality jobs in two restaurants in Brixton Village. Both candidates are still employed with their original employers.



---

<sup>2</sup> Department for Education



- Existing office space being used by local businesses, such as Black Seed founded by two London-based entrepreneurs whose objectives are to bring capital and community to black-owned businesses.

- In conjunction with Lambeth, the objective would be to make sure these opportunities are widely accessible to the local community and we envisage these jobs being publicised via various channels, for example through engagement with local Ward Councillors, Community Groups within the area, the Community Development Group set up as part of the section 106 Agreement. These opportunities could also be publicised on a specific website controlled by the Applicant, the Council's website and employment and skills team. For those who do not have access to the internet, the Applicant as part of this programme could arrange for separate flyering across the Ward.

### 3. Employment and Skills

- In addition to the number of apprenticeships already agreed, provide an additional 50% for apprenticeship opportunities during the Occupation stage but those additional apprenticeships will be targeted specifically for BAME communities.
- It is proposed to link in with companies like the Black Seed Fund who can help to provide access to these employment opportunities. Black Seed has the ambition to build venture studios, seed programmes, events, funds and other activities supporting Black founders.
- The development at Pope's Road is bigger than the existing markets and can provide other opportunities. We would channel the training into on-site opportunities which could potentially include building management, community and the affordable workspace provider.
- Whilst we cannot control tenant job training policy, we would seek to use reasonable endeavours to encourage tenants to adhere to the obligations and look to set potential criteria for use of this space for businesses focusing on local employment



- 4. All other S106 commitments would be maintained as per the November 2020 resolution.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 13 October 2021 14:32  
**To:** [REDACTED] [REDACTED] [REDACTED]  
**Subject:** Pope's Road FOI MGLA230821-1279  
**Attachments:** Popes Road meeting log.xlsx

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

Hi [REDACTED] and [REDACTED]

We've had an FOI on Pope's Road which asks how many time GLA staff have met with the applicant following the call-in.

To prepare an answer for this request (and potential future requests) I've put together a meeting log. This is attached and saved on the S Drive here: S:\Planning Decisions\Cases\Cases\5276\Stage 3.

The attached is based on meetings in our diaries, but in case something was missed would you mind having a look over it to ensure it looks complete to the best of your knowledge?

Cheers,

[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**  
169 Union Street, London, SE1 0LL



Pope's Road meeting log

Date	Attendees									
02 March 2021			(GLA)			(GLA)				
02 March 2021			(GLA)			(GLA)				
04 March 2021			(GLA)			(GLA)				
11 March 2021			(GLA)			(GLA)				
12 March 2021			(GLA)			(GLA)				
31 March 2021			(GLA)			(GLA)				
17 June 2021			(GLA)			(GLA)				
12 July 2021			(GLA)			(GLA)				
20 July 2021			(GLA)			(GLA)				
26 July 2021			(GLA)			(GLA)				
03 August 2021			(GLA)			(GLA)				
18 August 2021			(GLA)			(GLA)				
08 September 2021			(GLA)			(GLA)				
14 September 2021			(GLA)			(GLA)				
15 September 2021			(GLA)			(GLA)				
22 September 2021			(GLA)			(GLA)				
28 September 2021			(GLA)			(GLA)				
29 September 2021			(GLA)			(GLA)				
06 October 2021			(GLA)			(GLA)				
11 October 2021			(GLA)			(GLA)				
12 October 2021			(GLA)			(GLA)				



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 12 October 2021 18:03  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Pope's Rd

Thanks [REDACTED] Next Tuesday either time good with me.

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 12 October 2021 17:55  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Rd

Hi [REDACTED]

Happy to discuss Pope's Road and do a bit of a catch up.

Looking at our diaries, next Tuesday at 10 or 11 could work. Otherwise, Wednesday around noon or 1pm could work too.

Thoughts/preferences?

Best,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 12 October 2021 13:10  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]  
<[REDACTED]@london.gov.uk>  
**Subject:** Pope's Rd

Hi both,

I need to get up to speed with Pope's Rd. Would it be possible to have a catch up on progress and run through a couple of slides showing the scheme? Im pretty flexible later this week or next.

Thanks  
[REDACTED]  
[REDACTED]

**Special Projects, Planning**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 10 November 2021 09:59  
**To:** [REDACTED]  
**Subject:** RE: Popes Road, Brixton

Probably fine to just see you in there. Not much (anything) to report this week.

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 10 November 2021 09:55  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road, Brixton

Ok perfect. Do you want 5 mins beforehand or shall I just see you in there?

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 10 November 2021 09:54  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road, Brixton

I believe we are and [REDACTED] will be attending too.

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 10 November 2021 09:51  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road, Brixton

Thanks [REDACTED]

Sorry, this week has been crazy so far. Are we going ahead with the meeting today? I can make it if we are.

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 10 November 2021 09:32  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** FW: Popes Road, Brixton

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 02 November 2021 21:33  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@hondo-enterprises.com>; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Subject:** Popes Road, Brixton

Dear [REDACTED] and [REDACTED]

I refer to our recent conversations following submission of the enhanced S106 offer for your consideration. As you know, programme is now a pressing concern. Popes Road is one of a series of local

Brixton regeneration projects including Brixton Central (Pop Brixton and International House) and Blue Star House that are dependent on a positive outcome with this application. [REDACTED]

[Reg 12(5)(e)]

On this basis, I am setting out here what we consider to be a workable programme to enable this project to proceed subject to the Mayor's discretion to grant planning permission.

w/c 1<sup>st</sup> Nov 2021 – Agreed enhanced S106 offer for consultation

w/c 9<sup>th</sup> Nov 2021 – GLA make arrangements for 21 day GLA consultation on Hondo and officer agreed enhanced S106 offer

15<sup>th</sup> November to 3<sup>rd</sup> December – 21 day stat consultation period

3<sup>rd</sup> December to 3<sup>rd</sup> January 2022 – GLA consideration and assessment of planning application including revised offer

7<sup>th</sup> January 2022 – notification of Mayor's hearing

w/c 24<sup>th</sup> January 2022 – hearing and signing of S106 subject to Mayor's decision

31<sup>st</sup> Jan 2022 – 11<sup>th</sup> March 2022 – JR period

I trust this clear and I look forward to hearing from you with confirmation. I also confirm that my client is willing to enter into a PPA to expedite the process in line with this programme.

Best,

[REDACTED]

[REDACTED]  
Board Director

e-mail: [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

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[REDACTED]

---

**From:** [REDACTED]@lambeth.gov.uk>  
**Sent:** 07 October 2021 17:18  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Hondo s106

Hi [REDACTED]

Yes that will be useful. Next Tuesday PM apart from 3-4pm is good for me.

Thanks

[REDACTED]  
Sustainable Growth and Opportunity Directorate  
London Borough of Lambeth

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 07 October 2021 17:14  
**To:** [REDACTED]@lambeth.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Hondo s106

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

Hi [REDACTED]

Thanks for the heads up on this. Are you available for a quick call next week to discuss?

Best,  
[REDACTED]

---

**From:** [REDACTED]@lambeth.gov.uk>  
**Sent:** 06 October 2021 09:47  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]  
<[REDACTED]@london.gov.uk>  
**Subject:** Hondo s106

Hi [REDACTED] and [REDACTED]

Just a short note to say we have hit a bit of an impasse with Hondo regarding the s106 drafting. There are long term contributions (employment and skills endowment) that we require financial surety on, these being especially important given the weight given to this public benefit. At the moment we do not have financial assurance that the



obligations required under the s106, to address the development's impacts, can be fulfilled by the parties entering into the s106.

We are still exploring options but wanted to flag this as we have had little success in getting Hondo to address this issue.

Regards,

[REDACTED]

[REDACTED]

Sustainable Growth and Opportunity Directorate  
**London Borough of Lambeth**

[REDACTED]

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 30 September 2021 09:47  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: Pope's Road

Hi [REDACTED]

Thank you for your email. Sorry to be going back and forth with you. We are still in discussion about our proposals and so we actually think we might need more time and should therefore stick to our usual meeting next week. The intention is to send the offer across by CoP tomorrow.

Many thanks

[REDACTED]  
Associate Director  
direct: 020 [REDACTED]  
mobile: [REDACTED]  
e-mail: [REDACTED]@dp9.co.uk

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100 Pall Mall  
London  
SW1Y 5NQ

telephone: 020 7004 1700 facsimile: 020 7004 1790 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** Thursday, September 30, 2021 9:39 am  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Pope's Road

Hi [REDACTED] and [REDACTED]

Following up on your email regarding meeting on Friday (tomorrow), [REDACTED] and I are free from 15:00.

At this juncture, believe it would be useful if tomorrow's meeting was a slightly shorter, planners only one among the four of us. If I send through an invite for 15:30, would that suit?

Best,

[REDACTED]  
**Senior Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

[london.gov.uk](http://london.gov.uk)

[REDACTED] [london.gov.uk](http://london.gov.uk)

[REDACTED]

---

**From:** [REDACTED]@HistoricEngland.org.uk>  
**Sent:** 27 September 2021 10:20  
**To:** [REDACTED]  
**Subject:** RE: 20-24 Pope's Road, Brixton

Hi [REDACTED]

That would suit me – thank you for arranging.

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
[REDACTED]  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 19:53  
**To:** [REDACTED]@HistoricEngland.org.uk>  
**Subject:** RE: 20-24 Pope's Road, Brixton

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Hi [REDACTED]

Looking forward to meeting you. Would 12pm on Tuesday suit?

Best,  
[REDACTED]

[REDACTED]

**Senior Strategic Planner, Development Management**  
**GREATERLONDONAUTHORITY**  
City Hall, The Queen's Walk, London SE1 2AA

[london.gov.uk](https://www.london.gov.uk)

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

My pronouns are: [REDACTED]

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---

From: [REDACTED] <[REDACTED]@HistoricEngland.org.uk>  
Sent: 23 September 2021 14:52  
To: [REDACTED] <[REDACTED]@london.gov.uk>  
Cc: [REDACTED] <[REDACTED]@london.gov.uk>  
Subject: RE: 20-24 Pope's Road, Brixton

Hi [REDACTED]

That's helpful – thank you.

A quick Teams call would be great. I can be quite flexible on Tuesday and Wednesday next week, if there's a time that suits you both?

Kind regards

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

[REDACTED]  
[REDACTED]

---

From: [REDACTED] <[REDACTED]@london.gov.uk>  
Sent: 22 September 2021 16:26  
To: [REDACTED] <[REDACTED]@HistoricEngland.org.uk>  
Cc: [REDACTED] <[REDACTED]@london.gov.uk>  
Subject: RE: 20-24 Pope's Road, Brixton

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Hi [REDACTED]

Thanks for getting back in touch. Yes, [REDACTED] so [REDACTED] (cc'd) is now our case officer for this.

We don't have a hearing date as yet, but we are happy to keep you posted on that. If you like we could schedule a quick call on MS Teams so you can be introduced to [REDACTED] and so we can catch up more generally with respect to the likely programme etc.

Kind regards

[REDACTED]

[REDACTED] [REDACTED]

**Team Leader, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
020 7983 [REDACTED]  
[REDACTED]

**london.gov.uk**

[REDACTED] <[REDACTED]@london.gov.uk>



---

From: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>  
Sent: 22 September 2021 12:01  
To: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>  
Subject: RE: 20-24 Pope's Road, Brixton

Dear [REDACTED]

I've just received [REDACTED] out of office and wonder if you might be able to help.

I'd be very grateful for a brief update on this site and the public hearing. If there is a new case officer, their contact details would be helpful too.

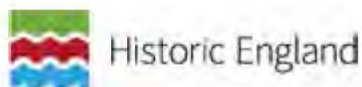
I can be contacted on either number below.

Many thanks

[REDACTED]  
[REDACTED]

4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

[REDACTED]  
[REDACTED]



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---

From: [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>  
Sent: 22 September 2021 11:54  
To: [REDACTED] <[\[REDACTED\]@HistoricEngland.org.uk](mailto:[REDACTED]@HistoricEngland.org.uk)>  
Subject: Automatic reply: 20-24 Pope's Road, Brixton

Thank you for your email.

I am on secondment and will not return to my post until August 2022.

All live Planning casework has been reallocated to a new officer. Please contact Planning Support for further information.

If you have an urgent query you may also contact the GLA Planning support team at: [planningsupport@london.gov.uk](mailto:planningsupport@london.gov.uk)

Kind regards

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 September 2021 16:28  
**To:** [REDACTED]  
**Subject:** RE: Popes Road

OK- I didn't know regen were previously involved so that makes sense

Are the applicants still pushing for a hearing date this year ?

[REDACTED]  
[REDACTED]

[REDACTED] **Planning**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
[REDACTED]

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**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 16:25  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road

Couple of reasons – the applicant is keen to identify any mayoral initiatives that regen are working on it may be appropriate to feed into as part of the public benefits package and regen were involved previously and keen to have an update on the scheme.

[REDACTED]

**Senior Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

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[REDACTED] [london.gov.uk](http://london.gov.uk)

My pronouns are: [REDACTED]

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---

**From:** [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 16:19  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road

Why are meeting regen ?

[REDACTED] [REDACTED]

[REDACTED] **Planning**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
[REDACTED]

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[REDACTED]@london.gov.uk

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---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 16:18  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road

Hi [REDACTED]

Yes, we've sketched out a path forwards.

[REDACTED] and I will be meeting with regen colleagues to update them on the scheme and discuss whether there might be appropriate mayoral initiatives that can be supported as part of the applicant's public benefits offer. If so, we'll feed that back to the applicant. I'm also going to look back through previous objections to see if there's anything in there we can suggest to the applicant to enhance their public benefits offer. Of course we're still pushing to work collaboratively with LBL on this, and have asked them to identify and local projects that could benefit from this scheme.

Once the applicant has crystallised an enhanced, Brixton-focused offer we'll brief Jules. Does this sound reasonable to you?

Best,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 14:42  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road

Hi

Thanks for confirming . Did you agree next steps with the applicants team yesterday ?

[REDACTED]

[REDACTED] Planning

GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

[www.london.gov.uk/what-we-do/planning](http://www.london.gov.uk/what-we-do/planning)

[REDACTED] [london.gov.uk](http://london.gov.uk)

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---

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 23 September 2021 14:41

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Popes Road

Hi [REDACTED]

[REDACTED] and I looked this up yesterday to confirm, and no it doesn't look like it is.

Best,

[REDACTED]

---

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 23 September 2021 14:38

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Popes Road

Hi

Is the scheme an EIA development ?

Many thanks

[REDACTED]

[REDACTED]

[REDACTED] Planning

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City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 September 2021 15:47  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Pope's Road

Thanks [REDACTED]

We'll review diaries this side and propose something shortly.

[REDACTED], so perhaps let's get an MS Teams meeting in the diaries initially, with the hope that it might be possible to subsequently upgrade it to a meeting in person!

Thanks

[REDACTED]

---

[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 14:41  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Pope's Road

Sure, yes, someone was asking about the progress on this project recently, so it would be good timing to catch up. My GLA days are [REDACTED]... happy to do a time at union st when you are both in? next week, wednesday or Thursday look good.

Thanks

[REDACTED]

[REDACTED]  
Regeneration and Economic Development

GREATERLONDONAUTHORITY  
City Hall  
The Queen's Walk  
London SE1 2AA  
[REDACTED]

Please note my GLA work days are Wednesday to Friday

[Sign up](#) to the Mayor's Regeneration Newsletter to find out about opportunities for funding and support, get tips on making great projects happen, and discover regeneration highlights from around London.

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 23 September 2021 10:32  
**To:** [REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Pope's Road

H [REDACTED]

I hope you are well? I'm conscious it is probably time we had a catch up on this. Things have progressed only relatively slowly over the summer, but we are now looking towards a potential hearing in Dec (but still very much TBC).

I'm not sure if you will be aware, but [REDACTED], so [REDACTED] (cc'd) is now our new planning case officer. I think it would be helpful if we could arrange a short MS Teams call (or even a Monday meeting at Union Street?!) as an opportunity for you to meet [REDACTED] and for us all to have a brief catch up on this.

If you are happy to do this [REDACTED] can help to coordinate a slot.

Many thanks

[REDACTED]

[REDACTED] [REDACTED]

**Team Leader, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 22 September 2021 12:02  
**To:** [REDACTED]  
**Subject:** FW: Hondo Tower, Brixton

Hi [REDACTED]

[REDACTED] is our Regen contact on this FYI.

Once we have that email from DP9 I'll drop [REDACTED] a line to introduce you as the new case officer, and to propose a meeting for us to jointly discuss the art of the possible on this.

Thanks

---

**From:** [REDACTED]@london.gov.uk>  
**Sent:** 16 June 2021 09:42  
**To:** [REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Hondo Tower, Brixton

Hi [REDACTED]

Yes, the regeneration scheme includes Station road, but not Pope's road. The borough's regeneration team have expanded the scope of the project to call it 'Brixton Rec Quarter', the first elements of which are being consulted on now <https://beta.lambeth.gov.uk/revitalising-brixtons-rec-quarter/project-overview> ; the implementation of this is due later this year, but as I understand it, there are plans to ensure that the new developments on Popes Road and the Pop Brixton site are coordinated with this more trader/market user-focussed improvement programme.

With regards to your application, the bottom line for me urbanistically was the provision of as much public realm space as possible on Pope's road, given it is already very tight without this building and a possible new station entrance; and to make the two lanes on either side of the tower facing the viaduct feasibly usable and welcoming – both seemed very compromised in the last version of the Hondo scheme I saw. The integration into, and resolution of the wider street market waste management regime would also seem to me to be something this project should be doing, as well as better coordination and planning with Network Rail to open up a pedestrian route through a vacant arch, to make better permeability from Brixton Station Road from the Popes Road site.

Do loop me in when things move on,

Thanks

---

**From:** [REDACTED]@london.gov.uk>  
**Sent:** 14 June 2021 14:16  
**To:** [REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Hondo Tower, Brixton

Hi [REDACTED]

I'm well thanks, very much enjoying the weather!

Yes, this has been called in but we are very much in the early stages of discussions with the applicant and Lambeth on the stage 3 process. A date for the hearing has not yet been set. I'll be sure to loop you in as things progress.

Can you refresh my memory on the regeneration scheme, are these the proposals to the Brixton Rec only or do they extend to the market streets and more specifically onto Pope's Road?

Kind regards

[REDACTED]  
**Principal Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

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---

**From:** [REDACTED] [er@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>  
**Sent:** 11 June 2021 11:32  
**To:** [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>  
**Cc:** [REDACTED] <[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>  
**Subject:** Hondo Tower, Brixton

Hello both

I hope you are well. Just a quick question on where we are at with this application? We get asked as the Mayor's regeneration investment immediately adjacent is currently out to public consultation. If you are forming a response (it has been called in, right?), do loop us in, as there were some regeneration points made way back at the pre-app it would be helpful to ensure are reflected through to this stage.

Thanks

[REDACTED]  
**Regeneration and Economic Development**

GREATERLONDONAUTHORITY  
City Hall  
The Queen's Walk  
London SE1 2AA



[Redacted]

**From:** [Redacted]  
**Sent:** 07 September 2021 15:39  
**To:** [Redacted]  
**Subject:** FW: Pope's Road

Hi [Redacted] [Out of scope]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 04 September 2021 03:19

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Pope's Road

Hi [REDACTED] [Regulation 12 (4)(e)]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Senior Strategic Planner, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 September 2021 17:35  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Popes Road

Thanks [REDACTED]

I've just put in a slot for 13:30-14:30 on 14 Sept.

Kind regards

[REDACTED]

[REDACTED]

**Team Leader, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
020 7983 [REDACTED]  
07729 103695

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---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 02 September 2021 17:23  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]  
[REDACTED]  
**Subject:** RE: Popes Road

[REDACTED]

Thank you for your email. We look forward to receiving the feedback.

The 14<sup>th</sup> September between 13.00 – 15.00 is the best slot for us.

Kind regards

[REDACTED]

[REDACTED]  
Associate Director  
[direct: 020 \[REDACTED\]](mailto:[REDACTED]@london.gov.uk)

mobile: [REDACTED]  
e-mail: [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

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---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>

**Sent:** 01 September 2021 17:19

**To:** [REDACTED] <[REDACTED]@dp9.co.uk>

**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@lambeth.gov.uk>; [REDACTED] <[REDACTED]@lambeth.gov.uk>; [REDACTED] <[REDACTED]@dp9.co.uk>

**Subject:** RE: Popes Road

Hi [REDACTED]

Thanks for your email. I'm replying on [REDACTED] behalf as she has only just returned from leave. We have been considering the material you provided on 18 Aug and expect to be in a position to feedback on that very shortly.

In anticipation of that feedback and the associated direction of travel, I think at this stage it is worth us scheduling a meeting to discuss next steps and programme. I anticipate that we will also need a discussion about the public benefits package in the context of the planning balance on heritage and tall buildings.

Diaries are already fairly busy next week, but I was hoping we could schedule an MS Teams meeting w/c 13<sup>th</sup>. I provide an indication of availability below, please let me know what might be suitable. Needless to say we would very much welcome the attendance of Lambeth colleagues too where this is possible.

13 Sept: 15:30 – 17:30

14 Sept: 13:00 – 15:00

15 Sept: 10:00 – 17:30

16 Sept: 15:30 – 17:30

17 Sept: 12:00 – 16:00

Kind regards

[REDACTED]

[REDACTED] [REDACTED]

**Team Leader, Development Management**

**GREATERLONDONAUTHORITY**

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

[REDACTED]

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[REDACTED] [london.gov.uk](http://london.gov.uk)



---

From: [REDACTED] <[REDACTED]@dp9.co.uk>

Sent: 01 September 2021 14:51

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]

<[REDACTED]@dp9.co.uk>

Subject: RE: Popes Road

Hi [REDACTED]

[REDACTED] and I discussed this briefly last week. Please could you or [REDACTED] advise of next steps.

Best,

[REDACTED]

[REDACTED]  
Board Director

e-mail: [REDACTED]@dp9.co.uk

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SW1Y 5NQ  
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---

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 18 August 2021 12:27

To: [REDACTED] <[REDACTED]@dp9.co.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]

Subject: RE: Popes Road

Many thanks [REDACTED]

[REDACTED] and I will review this and confirm the next steps as soon as we can.

Kind regards

[REDACTED]

[REDACTED]

Team Leader, Development Management  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]  
[REDACTED]

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[REDACTED] [london.gov.uk](mailto:london.gov.uk)

---

**From:** [REDACTED] <[REDACTED] [dp9.co.uk](mailto:dp9.co.uk)>

**Sent:** 18 August 2021 12:22

**To:** [REDACTED] <[REDACTED] [london.gov.uk](mailto:london.gov.uk)>

**Cc:** [REDACTED] <[REDACTED] [london.gov.uk](mailto:london.gov.uk)>; [REDACTED] <[REDACTED] [london.gov.uk](mailto:london.gov.uk)>; [REDACTED]

<[REDACTED] [dp9.co.uk](mailto:dp9.co.uk)>

**Subject:** RE: Popes Road

Hi [REDACTED]

Thanks for this. we set out our response in the attached document which we have prepared alongside an updated note from Savills and the paper from Adjaye which shows the visual comparison which we submitted in July.

Adjaye document here [LINK](#)

I would be grateful if you could review and let me know if this enables you to resume internal GLA discussions. We are then keen to discuss next steps and programme to a hearing.

Best,

[REDACTED]

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

e-mail: [REDACTED] [dp9.co.uk](mailto:dp9.co.uk)

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---

**From:** [REDACTED] <[REDACTED] [london.gov.uk](mailto:london.gov.uk)>

**Sent:** 04 August 2021 14:52

**To:** [REDACTED] <[REDACTED] [dp9.co.uk](mailto:dp9.co.uk)>

**Cc:** [REDACTED] <[REDACTED] [london.gov.uk](mailto:london.gov.uk)>; [REDACTED] <[REDACTED] [dp9.co.uk](mailto:dp9.co.uk)>; [REDACTED]

<[REDACTED] [london.gov.uk](mailto:london.gov.uk)>

**Subject:** RE: Popes Road

Hi [REDACTED]

Yes it was a good week off thank you.

As you have discussed with [REDACTED] we need to more clearly understand the reasons behind the differential in proposed public benefit between the 20-storey proposal and the 18-storey scenario. At face value the impact on the public benefits package seems disproportionate for a two storey reduction in height, so we need the factors influencing this to be clearly explained.

I would be grateful if you could also include [REDACTED] (cc'd) in your response as she is in the process of picking up this case now that Toyin is on secondment.

Many thanks

[REDACTED]

[REDACTED] [REDACTED]

**Team Leader, Development Management**  
GREATERLONDONAUTHORITY  
City Hall, The Queen's Walk, London SE1 2AA  
020 7983 [REDACTED]  
[REDACTED]

**london.gov.uk**

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 04 August 2021 13:13  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Subject:** Popes Road

Hi [REDACTED]

I hope you had a good week off.

[REDACTED] and I discussed the next steps here last week. Please could you send confirmation of this so we can finalise our response and issue this. We are keen to maintain momentum here and establish a programme to the Public Hearing at the earliest opportunity.

I look forward to hearing from you, hopefully today.

Best,

[REDACTED]

[REDACTED] [REDACTED]  
Board Director  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 September 2021 18:55  
**To:** [REDACTED]  
**Subject:** RE: Popes Road

Hi [REDACTED]

Yes, will do. Just finishing a preliminary wading through/sorting of my inbox and will be looking through the material later today. I'll look at our diaries and slot something in.

Best,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 01 September 2021 17:25  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** FW: Popes Road

Hi [REDACTED]

[REDACTED]

I'm not sure if you will have had much of a chance to look at the material for this yet, but perhaps once you have you could put a slot in my diary so we can jointly discuss the response (which I feel can be fairly concise).

Ideally I'd like to get something out the door by email end of this week / early next, but we will need to run it past [REDACTED] first.

Many thanks

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 September 2021 17:19  
**To:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Cc:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; Rob Bristow <[RBristow@lambeth.gov.uk](mailto:RBristow@lambeth.gov.uk)>; Robert O'Sullivan <[ROsullivan@lambeth.gov.uk](mailto:ROsullivan@lambeth.gov.uk)>; [REDACTED] <[REDACTED]@dp9.co.uk>  
**Subject:** RE: Popes Road

Hi [REDACTED]

Thanks for your email. I'm replying on [REDACTED] behalf [REDACTED]. We have been considering the material you provided on 18 Aug and expect to be in a position to feedback on that very shortly.

I

[Remainder of email chain duplicated above]



[REDACTED]

---

**From:** Robert O'Sullivan <ROsullivan@lambeth.gov.uk>  
**Sent:** 01 September 2021 18:18  
**To:** [REDACTED]  
**Cc:** [REDACTED] Rob Bristow; [REDACTED] Shane Baker  
**Subject:** RE: Popes Road

Hi [REDACTED]  
Thanks for your email and suggested dates/times. I'm looping [REDACTED] into the email trail as he has been lead officer following [REDACTED]  
Kind regards,

[REDACTED]  
[REDACTED] Development Management and Enforcement  
Sustainable Growth and Opportunity Directorate  
London Borough of Lambeth

[REDACTED] 4  
[REDACTED] <[REDACTED]@london.gov.uk>

Sent: 01 September 2021 17:19

To: [REDACTED] <[REDACTED]@dp9.co.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]

[REDACTED]  
<[REDACTED]@dp9.co.uk>

**Subject:** RE: Popes Road

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

Hi [REDACTED]  
Thanks for your email. I'm replying on [REDACTED]. We have been considering the material you provided on 18 Aug and expect to be in a position to feedback on that very shortly.

[Remainder of email chain duplicated above]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 01 September 2021 16:23  
**To:** [REDACTED]  
**Subject:** RE: Popes Road

Ok, will do

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 01 September 2021 16:21  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** Re: Popes Road

Hi

Yes I think that makes sense they are chasing on this as they have a tight programme for decision

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** Wednesday, September 1, 2021 4:17:53 PM  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road

Hi [REDACTED]

I will reply to this to explain that [REDACTED] has been on leave, but that we expect to be in a position to feedback on their latest submission shortly (potentially by close on Friday, but I want to discuss this with [REDACTED] first).

Would you like me to also propose that we schedule our next meeting with the applicant team to discuss next steps (public benefits package) and general programme?

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 01 September 2021 14:51

To: [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Cc: [REDACTED] [REDACTED] <[REDACTED][london.gov.uk](mailto:[REDACTED]@london.gov.uk)>; [REDACTED] <[REDACTED][london.gov](mailto:[REDACTED]@london.gov)

[REDACTED] [REDACTED] [REDACTED]

<[REDACTED][dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)>

Subject: RE: Popes Road

Hi [REDACTED]

[REDACTED] and I discussed this briefly last week. Please could you or [REDACTED] advise of next steps.

Best,

[REDACTED]

[Remainder of email chain duplicated above]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 18 August 2021 11:47  
**To:** [REDACTED]  
**Subject:** FW: Popes Road  
**Attachments:** 210520\_NotionalHeightsStudyScenarios-lq (004).pdf; Pope's Road - Savills Report.pdf

As discussed.

Feel free to fix a slot for us to catch up once you have had a chance to review the attached.

Thanks

[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@dp9.co.uk>  
**Sent:** 10 June 2021 20:02  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]  
[REDACTED]  
[REDACTED]  
<[REDACTED]@dp9.co.uk>  
**Subject:** Popes Road

Dear [REDACTED] and [REDACTED],

I refer to our conversations about this application which the Mayor has recovered for his own determination. As an initial exercise, we understand that the Deputy Mayor has requested to see a series of alternative height studies comparing the "Lambeth resolved to grant" 20 storey scheme at 18, 16 and 14 storeys and for this to be shown in views from Electric Avenue, the Town Hall steps and Brixton Hill on front of St Matthew's Church. As we explained on a recent call, the notional reduction in the height of the building cannot be assessed as a townscape matter alone and must be considered in the round with the associated benefits and how those benefits would change with corresponding height loss. We have added the 23 storey version to the study as that was shown in pre-app stage on the basis that it represented the appropriate townscape response to the site was reduced in dialogue with Lambeth. The attached document therefore presents the various height studies in those views and alongside it shows how this would affect the planning benefits package. As you know, the current scheme was given very careful and rigorous consideration in negotiation with Lambeth officers and this arrived at 20 storeys with the associated planning benefits presented to the August 2020 Planning Applications Committee then further enhanced in the November 2020 which that committee resolved to grant planning permission.

The basic Brief for this project and through the selection of David Adjaye as architect has been to create a new office ecosystem alongside considerable amenities in an exemplary designed building. To act as a catalyst to regeneration in the area, the office ecosystem requires a critical mass of a minimum of 200ksqft, which would be compromised by any reduction in height and consequential loss of floorspace. Furthermore, the office ecosystem comprises micro, small and medium enterprise plus the capability to attract larger tenants at higher rents and this was demonstrated in the Savills report which we also attach to this note. Whilst our advice is that any loss of area would jeopardise the ecosystem, it is for this reason that the 14 and 16 storey versions are shown struck through because they would fall significantly short of



the stated minimum quantum of office space that would create the ecosystem that acts as the catalyst for the regeneration of Brixton Central, and the associated aspirations for job creation.

Finally, notwithstanding the “less than substantial harm” that has been identified by Lambeth, we would also add that the quality of architecture of the scheme also represents a planning benefit. It has been designed by Adjaye Associates, one of the UK and the world’s greatest architects (and recent RIBA Gold Medal Prize winner) who has presented a scheme of high distinction and the height, at 20 storeys, is part of a careful consideration of proportion and scale. This slenderness ratio would be reduced if the height is reduced and the greater the height reduction the less elegant it becomes and therefore the architectural distinction is diminished.

I am copying this to Lambeth who will be able to comment on the relative merits of the reduced heights and corresponding planning benefits package.

I look forward to continuing discussions with you about a route map to the mayoral hearing.

Best,

[Redacted Signature]

[Redacted Name]

Board Director

[Redacted Address]

e-mail: [Redacted] [dp9.co.uk](mailto:[Redacted]@dp9.co.uk)

**DP9 Ltd**

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 facsimile: 020 7004 1790 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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9<sup>th</sup> January 2020

C



[REDACTED]  
Hondo Enterprises  
9 Newburgh Street  
London  
W1F 7RL

[REDACTED]  
[REDACTED]  
[REDACTED]  
33 Margaret Street  
London W1G 0JD  
T: +44 (0) 20 7499 8644  
savills.com

Dear [REDACTED]

**PRIVATE & CONFIDENTIAL**

**Proposed Development at Pope's Road, SW4**

We have pleasure in setting out the conclusions of our review of the proposed scheme at Pope's Road, in the context of advising what we feel is required in order to ensure that the scheme is commercially sustainable.

In undertaking this review, we believe that it is important that we give consideration to both the Pope's Road site in question, along with the wider Brixton Central area, and associated office market / provision.

The site presents an opportunity to create a new building that will enhance the local area and provide businesses of all sizes an opportunity to work in Brixton. The site is currently in pre-planning stages for a 21 storey building.

**Brixton Office Market**

Brixton is located a short tube journey from the West End and is strategically located to benefit from the strength of the ever footloose central London office market. However, it has significantly lower office stock in comparison to more mature neighbouring London boroughs and the stock that exists consists of mainly outdated, smaller buildings. There are currently few options for any size of business would like to consider office space in Brixton.

Current office stock in the Brixton office market stands at just 7% of built stock with a vacancy rate of just 2%. The largest office buildings include Squire and Partners' headquarters at Ferndale Road, which they developed for their own occupation, the Lambeth Civic Centre, Blue Star House and International House, the co-working space run by 3space at International House. The net effect is that the significant majority of office occupiers in Brixton are small businesses seeking value.

With a historic lack of marketing investment, Brixton is not currently considered to be a bona fide London office market, its stock only rising recently as a result of Squire & Partners' office launch and the visitors attracted by it. Notwithstanding the potential redevelopment of Blue Star House, there remains a major opportunity to build on this recent success with further local office development.

In our opinion, in order to create a commercial office ecosystem that supports businesses at every stage of their life cycle (rather than seeing growing businesses migrate to large sub-markets across central London due to a lack of viable options to stay), it is essential that the scheme is of sufficient critical mass to accommodate

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD

a diverse range of occupiers. If achieved, Pope's Road can be the catalyst for a major change to the Brixton office market, kickstarting the office regeneration, including the potential redevelopment of other local sites, including Pop Brixton and International House.

## **Scheme Analysis**

The 21 storey scheme provides an opportunity to secure large established tenants to Brixton and to change the occupier mix in an under supplied market as well as support small and medium businesses.

**It is this diversity of occupiers that Savills strongly recommends is embraced and facilitated by the optimal scheme at Pope's Road, offering a variety of sizes for all types of businesses. The types of businesses / tenants that will need to be facilitated, along with their broad requirements, are set out below;**

### **1. Large (Anchor) Tenants**

The size of the building creates the opportunity to secure an established office occupier that will put Brixton on the map as a London office location. Occupier demand remains strong in London and a number of high profile tenants have office requirements of 100,000 sq ft + over the next 2-3 years. These include the likes of Netflix, Funding Circle and Monzo, to name but a few. Savills research shows that the average current size of large office requirements (50,000 sq ft +) averages 109,607 sq ft across Central London with key search criteria being:

- Character
- Amenity
- Scale

The types of organisations that could fall into this category include fashion brands, tech/media companies or pioneering professional occupiers.

Typically these larger tenants would look to take floorplates of c.16-18,000 sq ft plus. Unfortunately the site constraints do not allow for the development to facilitate significant floorplates of this size. However, due to the quality of the emerging scheme we feel that it should be possible to create a commensurate product, but the floors would need to be a minimum of 8,000 sq ft with soft spots for interconnecting staircases, realistically in clusters of two. The impact is would be an overall reduction in the net lettable area of the office accommodation, which is not ideal, but we feel would be of interest to this type of tenant

The current ground floor entrances to both buildings are interesting in the way they integrate with the market, in a way which is not corporate, and therefore would be seen as being "of Brixton". However, they are relatively small, given the size of the upper parts. It is therefore expected that the lower office floor, or at least a major part thereof will need to be given over to the amenity and wellness facilities essential to all modern office occupiers. Receptions are no longer simply regarded as a conduit into and out of a building; modern occupiers regard them as a valuable amenity that complements their own office space.

Occupiers will want an enlarged reception and a club lounge on the lowest office level to improve the sense of scale of the building. Incorporating a café/breakout space as well as potentially communal meeting rooms within the reception allows tenants to be flexible within the building, with collaborative breakout space, away from

their office floor. We are relying on this type of amenity to secure these tenants, which will ultimately **decrease** some of the net lettable office space.

The inclusion of the bike store adds to this amenity and should further be complemented by high quality shower, changing and locker facilities. The importance of these facilities should not be underestimated and is routinely examined by potential occupiers. It is encouraging to see that space is already dedicated to this.

From the designs we have reviewed, the building will meet a high standard in commercial office space design and delivers the scale to satisfy large occupiers. We believe the massing at 21 storeys offers standout character and profile to attract large occupiers. However, it would be a missed opportunity to target these occupiers in isolation.

As we have experienced at King's Cross on behalf of Argent, attracting a large anchor office tenant will also attract small and medium-sized organisations. It is essential that the scheme is able to accommodate these occupiers and can embrace the principles of Lambeth's Creative Enterprise Zone.

## **2. *Established Medium-Size Enterprises***

Attracting a large occupier is a key aim as it helps put the local office market in the spotlight. However, incorporating office space that can accommodate medium-sized businesses is equally important as it creates a diverse tenant mix, a further scaling opportunity for occupiers and, ultimately, diversifies risk for the scheme and sub-market.

There are currently no good quality offices in Brixton to support businesses of 25-100 people. Offering a proportion of the tower floors to occupiers will mean that businesses can grow locally and that any size of occupier can stay in Brixton.

## **3. *Serviced offices***

Buildings of 150,000 sq ft + increasingly have a serviced office provider in the building, offering tenants in the building project space, growth opportunities and extra facilities for meetings/events. It will be an important draw for those anchor tenants who would take large quantities of spaces in the building. In addition, and most importantly, they offer small businesses (1-25 people) high quality workspace in the area. There are a number of high quality providers who would like to take space in this location.

The average size in sq ft for a serviced office provider letting in the West End over the last 5 years has been approximately 27,000 sq ft, mainly because they struggle to maintain a healthy margin at below approximately 25,000 sq ft. We would expect a slight increase on this in the fringe submarkets.

We strongly recommend delivering a minimum space of c.30,000 sq ft for serviced offices, enabling small local and wider London businesses to participate in this exceptional building.

## **4. *Affordable Workspace***

The scheme design, incorporates an area equivalent to 10% of the office area that can be dedicated to Affordable Workspace, to meet local demand by SMEs for co-working. It is assumed that the start-up and incubator type facilities that we understand are likely to come forward on the Pop site and International House, would benefit from this affordable workspace provision, and as such become a key contributor to the over ecosystem we described earlier.



This would comfortably sit alongside a traditional serviced office provider as is more likely to offer co working collaborative spaces with the serviced office providers providing private office space for businesses as they mature.

## Conclusion

In conclusion, to achieve these four target tenant types as well as offer best in class amenities, the proposed 200,000 sq ft office scheme, provides a quantum that is satisfactory to achieve the optimal tenant mix for the start of Brixton's office regeneration, although would ideally be larger.

Taking into account an average large scale office requirement of c.110,000 sq ft, 30,000 sq ft for serviced offices and c.20,000 sq ft (10%) of affordable workspace this would leave approximately 32,000 sq ft of office accommodation over 4 floors available for medium sized occupiers, assuming a wellness space/reception of approximately 8,000 sq ft.

We believe that 3-5 floors is optimal for medium businesses to ensure a critical mass of occupiers and a range of tenants in the building and Brixton.

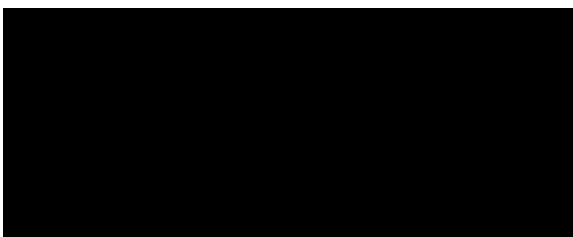
## Summary

- The local market is under supplied of office stock and there is an opportunity to build on this and grow this office sub-market.

In order to create a sustainable recognisable office destination, it is essential that a critical mass is achieved, that facilitates a wide range of tenant types and sizes, as well as providing the associated amenities that would be required.

- The scheme is well designed and will satisfactorily meet the needs of a varying tenant mix, although would ideally be larger.
- The size of building means that all types of occupiers can have office accommodation in Brixton
- We have every confidence that there will be strong demand for the finished scheme in its current form

Yours sincerely



Savills

Cc. [REDACTED] – Hondo  
Cc. [REDACTED] – DP9  
Cc. [REDACTED] – DP9  
Cc. [REDACTED] - Savills

# 20-24a Pope's Road

Notional Heights Study Scenarios



# Introduction

**DRAFT**

- The Application was recommended for approval by London Borough of Lambeth subject to referral to the Mayor and the signing of the relevant Section 106 Agreement.
- London Borough of Lambeth referred the application for the Mayor's Stage 2 consideration on 2 December 2020 and the Mayor made his Stage 2 decision, following his planning meeting, on 14 December 2020 outlining that he was content for the Local Planning Authority to be the decision maker.
- Following representations made by Leigh Day (acting on behalf of the Local Opposition group 'Fight the tower') on 25 January, the GLA confirmed that they would be rescinding the Mayor Stage 2 report previously issued and start afresh.
- On 1 March 2021, the Mayor of London directed powers (under the powers conferred by Section 2A of the 1990 Act) confirming that he will act as the local planning authority for the purposes of determining the planning application. The reasons for this related to the adoption of London Plan in March 2021, the significant effects on more than one London Borough and due to sound planning reasons.
- GLA officers have asked to see a summary of the building height scenarios previously discussed with LBL in view n.26, n.13 & n.10, which should include 14, 16 & 18 storeys. These scenarios should reflect discussions around public benefits packages.

**DRAFT**

Hondo Initial Proposal to LBL for a 23 storeys scheme

View 26 - Electric Avenue East



**DRAFT**

# Initial Proposal - 23 Floors Scheme

View 26 - Electric Avenue East

Initial Proposal Rejected  
by LBL



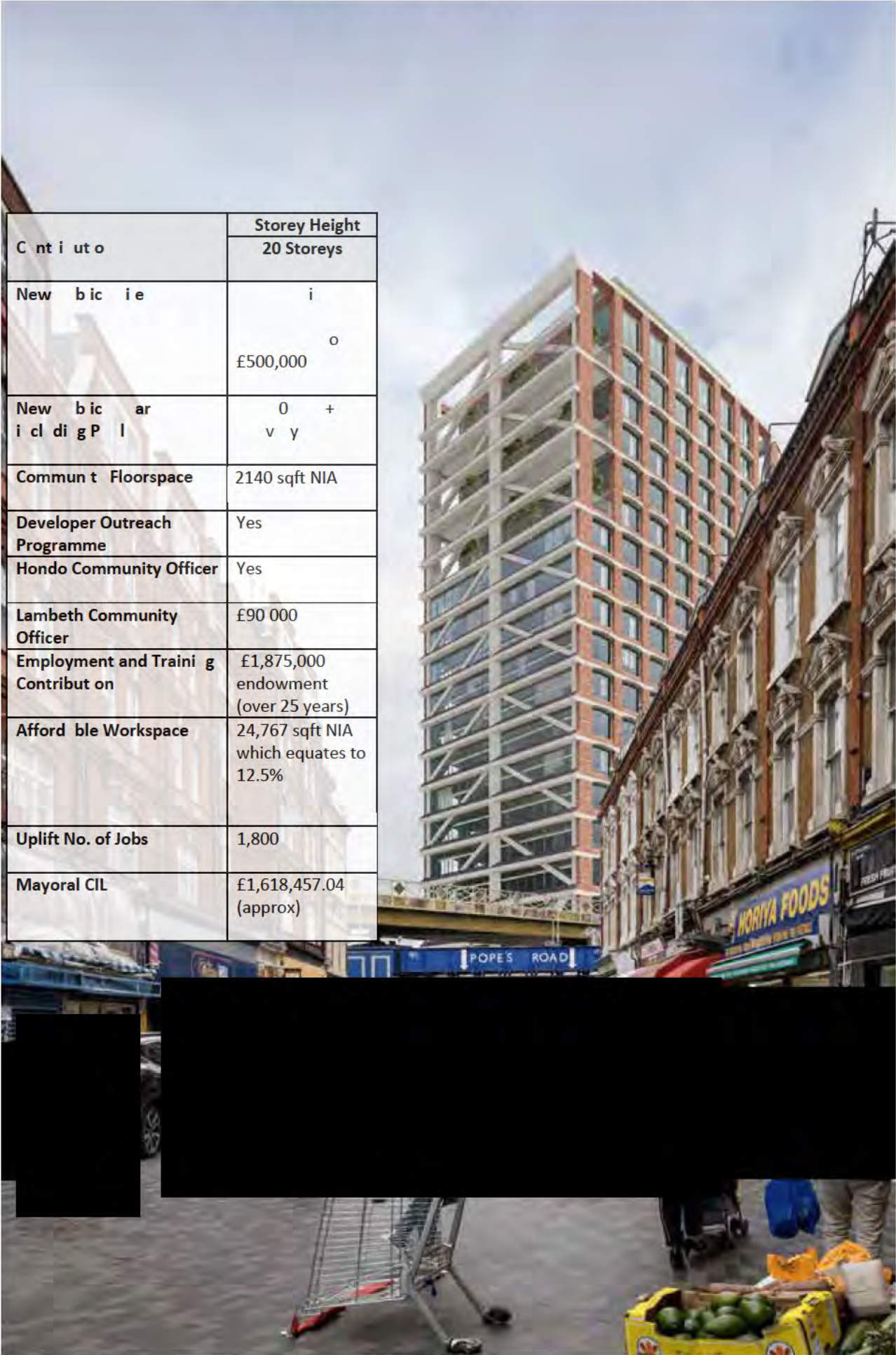


DRAFT

# LBL Consented Scheme - 20 Floors

View 26 - Electric Avenue East

C n t i u t o	Storey Height
	20 Storeys
New b i c i e	i o £500,000
New b i c a r i c l d i g P l	0 + v y
Commun t Floorspace	2140 sqft NIA
Developer Outreach Programme	Yes
Hondo Community Officer	Yes
Lambeth Community Officer	£90 000
Employment and Traini g Contribut on	£1,875,000 endowment (over 25 years)
Afford ble Workspace	24,767 sqft NIA which equates to 12.5%
Uplift No. of Jobs	1,800
Mayoral CIL	£1,618,457.04 (approx)

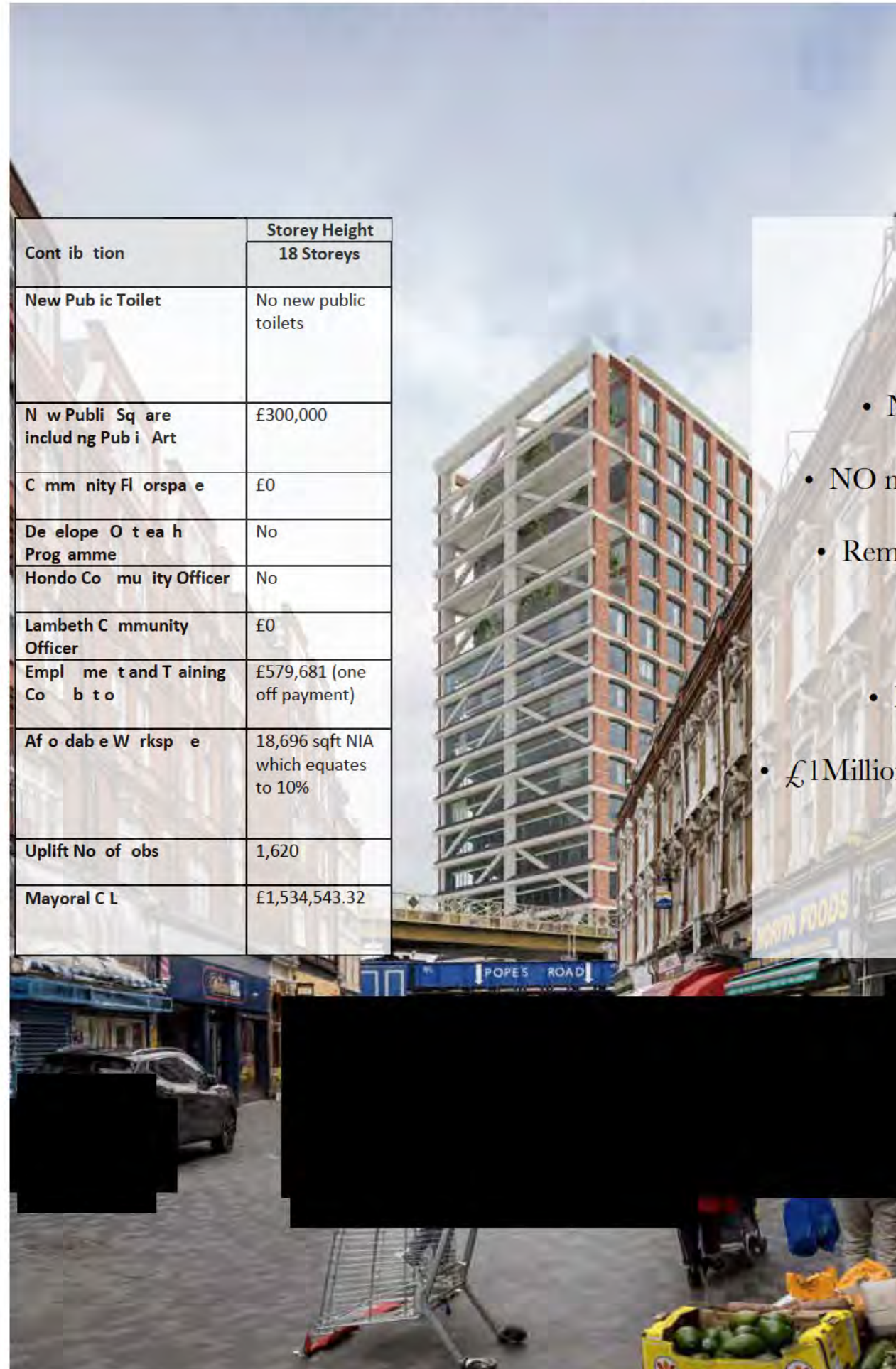




DRAFT

# Notional Proposal - 18 Floors Scheme with Reduced Benefits

View 26 - Electric Avenue East



Contribution	Storey Height
	18 Storeys
New Public Toilet	No new public toilets
New Public Square including Public Art	£300,000
Community Floorspace	£0
Developer Outreach Programme	No
Hondo Community Officer	No
Lambeth Community Officer	£0
Employment and Training Contribution	£579,681 (one off payment)
Affordable Workspace	18,696 sqft NIA which equates to 10%
Uplift Number of jobs	1,620
Mayoral CL	£1,534,543.32

Reduction of Benefits include :

- Existing toilet block remains in place on Pope's Road
- NO reprovision of public toilets in the proposed building
- NO new public square and refurbishment of the existing only
- Removal of 2140sqft NIA dedicated Community Floorspace
- NO developer led Community Outreach Program
- NO developer funding for Lambeth Community Officer
- £1 Million c. Reduction in Employment & Training Contribution
- Reduction in Affordable Workplace of c. 2,500 sqft.
- Reduction of c. 200 jobs



# Notional Proposal - 16 Floors Scheme Undeliverable

View 26 - Electric Avenue East

**DRAFT**

**UNDELIVERABLE**





# Notional Proposal - 14 Floors Scheme Undeliverable

View 26 - Electric Avenue East

**DRAFT**

**UNDELIVERABLE**



**DRAFT**

Hondo Initial Proposal to LBL for a 23 storeys scheme

View 13 - Brixton Hill\_Lambeth Town Hall



# Initial Proposal - 23 Floors Scheme

View 13 - Brixton Hill\_Lambeth Town Hall

DRAFT

Initial Proposal Rejected  
by LBL





# LBL Consented Scheme - 20 Floors

## View 13 - Brixton Hill\_Lambeth Town Hall



C t i u t o	Storey Height 20 Storeys
N P b c s	i o o £500,000
N P b l c a i c l d i g P l r	00 + y
Commun t Floorspace	2140 sqft NIA
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# Notional Proposal - 18 Floors Scheme with Reduced Benefits

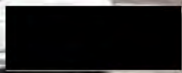
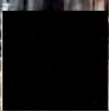
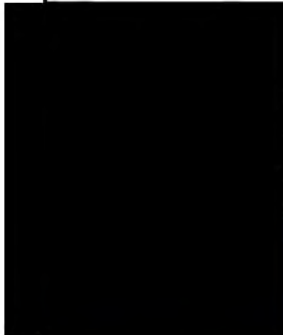
View 13 - Brixton Hill\_Lambeth Town Hall

DRAFT

Contribution	Storey Height 18 Storeys
New Public Toilet	No new public toilets
New Public Square including Public Art	£300,00
Community Floorspace	£0
Develop Outreach Programme	No
Hondo Community Office	No
Lambeth Community Officer	£0
Employment and Training Contribution	£579,681 (one off payment)
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- £1Million c. Reduction in Employment & Training Contribution
- Reduction in Affordable Workplace of c. 2,500 sqft.
- Reduction of c. 200 jobs





# Notional Proposal - 16 Floors Scheme Undeliverable

View 13 - Brixton Hill\_Lambeth Town Hall

DRAFT

UNDELIVERABLE





# Notional Proposal - 14 Floors Scheme Undeliverable

View 13 - Brixton Hill\_Lambeth Town Hall





**DRAFT**

Hondo Initial Proposal to LBL for a 23 storeys scheme

View 10 - Brixton Hill\_Baytree Road



# Initial Proposal - 23 Floors Scheme

View 10 - Brixton Hill\_Baytree Road

DRAFT

Initial Proposal Rejected  
by LBL





# LBL Consented Scheme - 20 Floors

View 10 - Brixton Hill\_Baytree Road

DRAFT



C t i u t o	Storey Height 20 Storeys
N P b c s	i o o £500,000
N P b l c a i c l d i g P l r	00 + y
Commun t Floorspace	2140 sqft NIA
Developer Outreach Programme	Yes
Hondo Community Officer	Yes
Lambeth Community Officer	£90 000
Employment and Traini g Contribut on	£1,875,000 endowment (over 25 years)
Afford ble Workspace	24,767 sqft NIA which equates to 12.5%
Uplift No. of Jobs	1,800
Mayoral CIL	£1,618,457.04 (approx)



# Notional Proposal - 18 Floors Scheme with Reduced Benefits

View 10 - Brixton Hill\_Baytree Road



Cont ib tion	Storey Height 18 Storeys
New Pub ic Toilet	No new public toilets
N w Pub i Sq e includ ng Pub ic Art	£300,00
C mm nity Fl orspa e	£0
De elope O t ea h Prog amme	No
Hondo Co mu ity Of ice	No
Lambeth C mmunity Officer	£0
Empl yme and T aining Co b to	£579,681 (one off payment)
Af o dab e W rksp e	18,696 sqft NIA which equates to 10%
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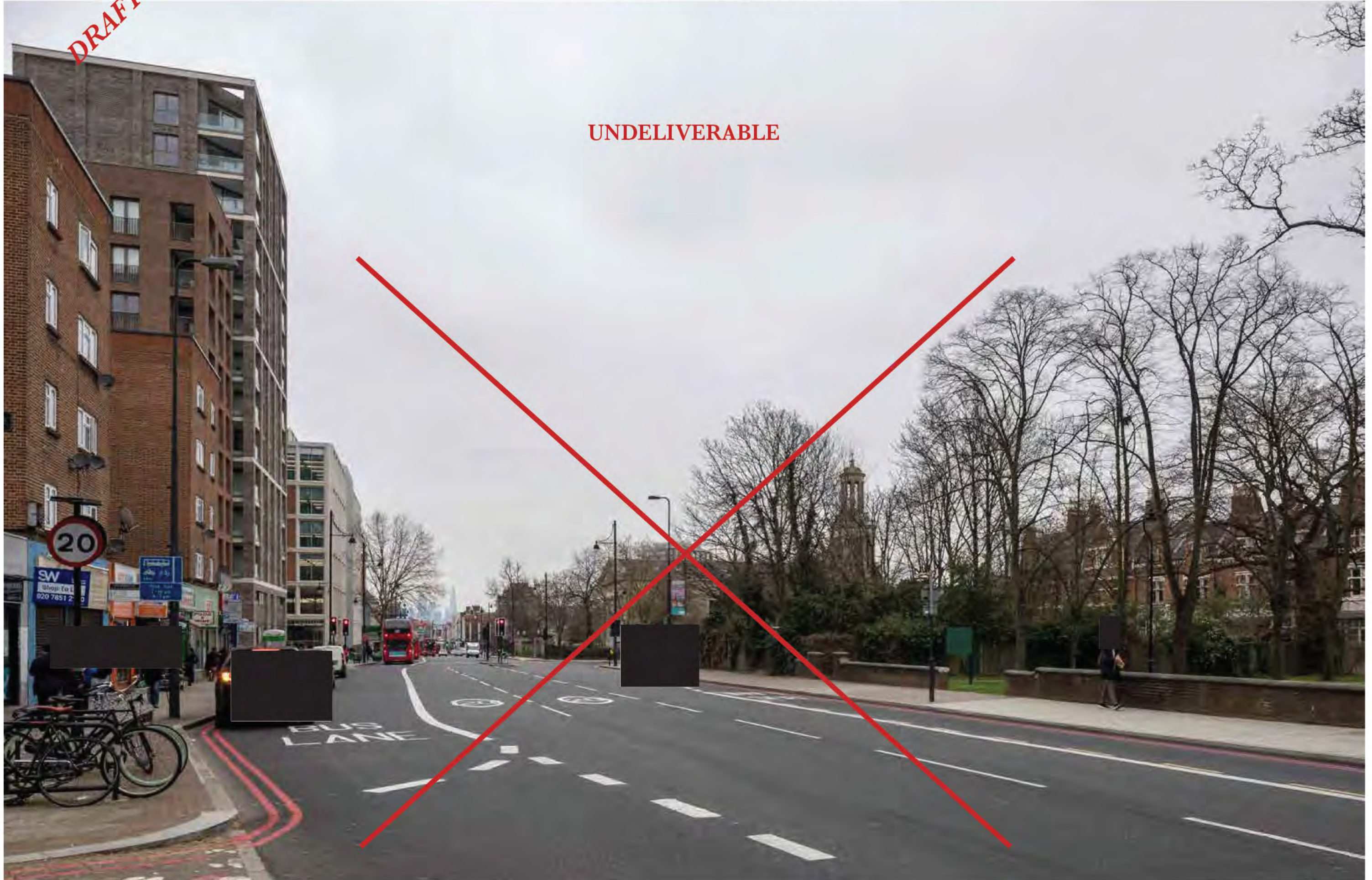


# Notional Proposal - 16 Floors Scheme Undeliverable

View 10 - Brixton Hill\_Baytree Road

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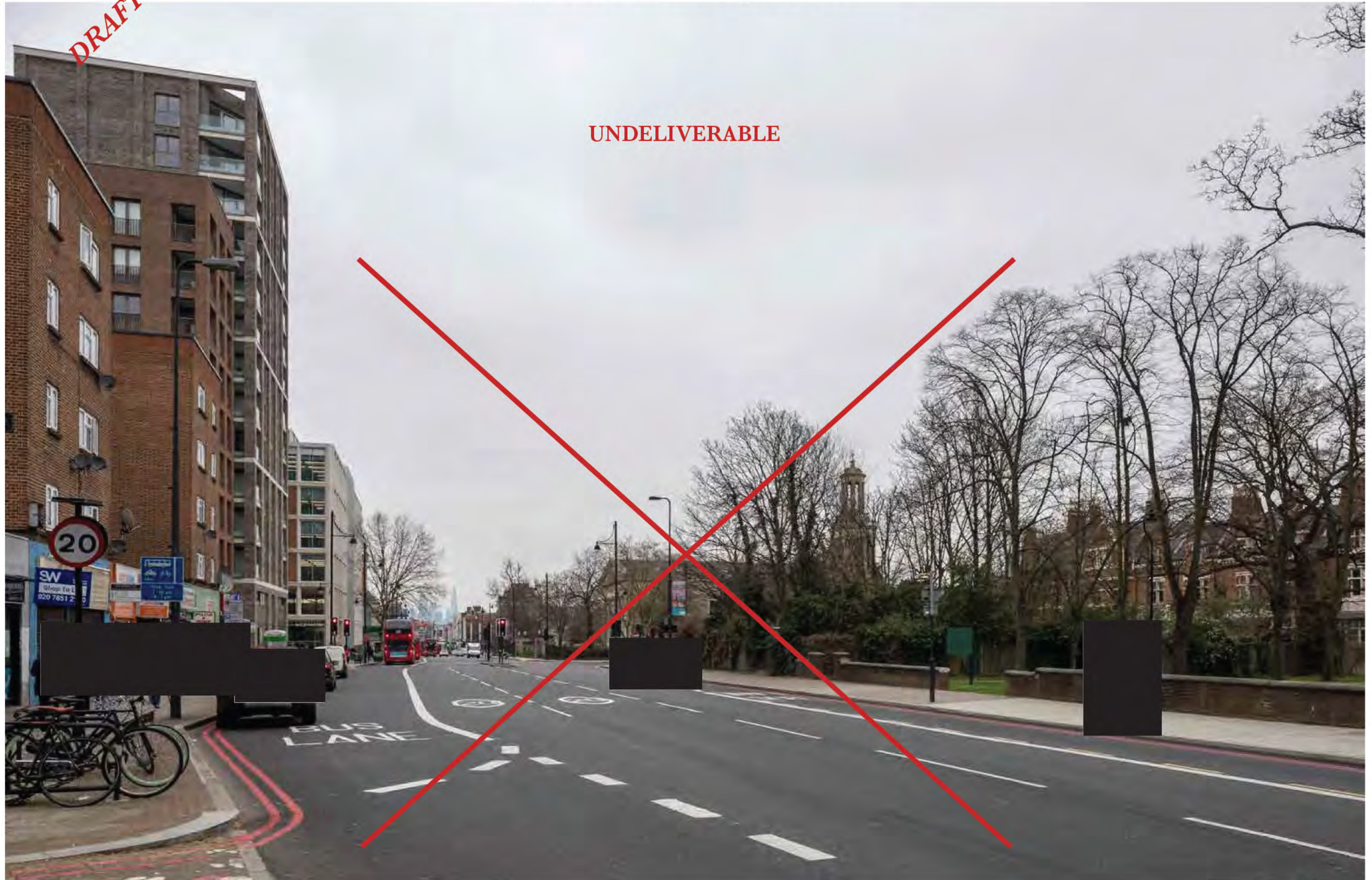
UNDELIVERABLE





# Notional Proposal - 14 Floors Scheme Undeliverable

View 10 - Brixton Hill\_Baytree Road





# LBL Consented Scheme - 20 Floors

View 26 - Electric Avenue East

DRAFT

Contribution	Storey Height 20 Storeys
New Public Toilets	1000 £500,000
New Public Space including Public Art	1000 + 1000
Community Floorspace	2140 sqft NIA
Developer Outreach Programme	Yes
Hondo Community Officer	Yes
Lambeth Community Officer	£90,000
Employment and Training Contribution	£1,875,000 endowment (over 25 years)
Affordable Workspace	24,767 sqft NIA which equates to 12.5%
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# 18 Floors Scheme with Reduced Benefits

View 26 - Electric Avenue East

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Community Floorspace	£0
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Affordable Workspace	18,696 sqft NIA which equates to 10%
Uplift No. of jobs	1,620
Mayoral CIL	£1,534,543.32



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 04 August 2021 15:07  
**To:** [REDACTED]  
**Subject:** RE: Popes Road catch up

Hi [REDACTED]

Sounds good to me.

Best,  
[REDACTED]

---

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 04 August 2021 15:01  
**To:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Subject:** RE: Popes Road catch up

Hi [REDACTED]

This meeting will be an opportunity for [REDACTED] and I to bring you up to speed a bit more on Pope's Road. With any luck DP9 will have given us a response to look at by then too. Don't feel you need to express a view on anything prior to then, but if anything does come up on this while I am on leave next week feel free to go straight to [REDACTED] for any clarifications/steers as necessary.

Many thanks

[REDACTED]

-----Original Appointment-----

**From:** [REDACTED] <[REDACTED]@london.gov.uk>  
**Sent:** 04 August 2021 14:55  
**To:** [REDACTED]  
**Subject:** Accepted: Popes Road catch up  
**When:** 18 August 2021 11:00-11:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.  
**Where:** Microsoft Teams Meeting