

Brixton Society

Objection to the revised proposal (response received 21 October 2020) for the following reasons:

- Height & Massing: the height is unchanged and the link between the two towers is proposed to be one storey higher, so clearly no mitigation has been offered by the applicants. The height alone breaches the Lambeth Local Plan (policy Q26 on tall buildings) and adversely affects the adjacent Brixton Town Centre Conservation Area. That height reflects the massive office floorspace proposed for the site.

- Materials & Finishes: apart from a slight lightening of the brick colour, the façade treatment and heavy detailing of the upper floors continue to reinforce the impression of excessive height and bulk.
- Amount of Office Floorspace: the massive amount of office floorspace proposed looks increasingly like a white elephant, which is very unlikely to be fully taken up. Our concern is that it would eventually be converted into sub-standard residential accommodation, given the Government's stated intentions for further easing of Permitted Development. The applicants have failed to demonstrate that there is demand for 19 floors of new office space in Brixton. Historically, market interest in Central Brixton office space has been limited, sustained only by the Council's own needs, lately much reduced. The only evidence supplied is a letter from Savills dated 9 January. This predates the shift to much more home-based working, accelerated by the Coronavirus epidemic, which has undermined the demand for conventional office floorspace, particularly outside the established London office locations. In contrast, we cite the BBC's survey of 50 of the UK's largest employers (26 August) and the CBI/ Price Waterhouse survey of financial services employers (8 October).

On behalf of the applicants, planning officers argued for a large office area in order to attract an "anchor" business tenant, around whom smaller businesses would cluster in some kind of commercial eco-system. However, it is clear that this concept was not shared with the architect. It might work for an office building with staff amenities in a shared foyer, but here office staff would instead arrive and depart via an extension to the Brixton Village arcade. Of course, there is some demand for office space in Brixton, but mostly from smaller employers looking for affordable space, which would only account for 10% of the total in the Hondo Tower. A more realistic target would be based on a more energy-efficient replacement for International House, with a modest percentage increase, but still aimed at smaller enterprises. In contrast, the proposed Hondo office floor plans show little advance on those of 50 years earlier.

- Microclimate effects: the updated report on wind effects has been reviewed. Outside the site, the Microclimate Assessment still fails to illustrate results for elevated locations such as the railway platforms, the entrance to the Brixton Recreation Centre, and balconies/ terraces at the rear of Walton Lodge, Carney Square and The Viaduct. These are all more vulnerable to adverse wind effects. Even at ground level, there will still be increased wind speeds below and beyond the Popes Road/ Station Road Railway Bridge, in front of the proposed tower, and along the rear approach from Valentia Place. Brixton Station Road and Pope's Road should remain important parts of the street market, and we are anxious that they do not become unattractive to shoppers and a more difficult working environment for stall-holders.
- Impact on Daylight for Nearby Flats: the effect of setting back the taller block from Pope's Road only has a marginal effect on the previous daylight and sunlight results for the surrounding buildings and sites. In fact, there is a slight adverse effect on a few properties as a result of the link between the two towers being raised one storey higher. The extent of surrounding properties affected remains substantially the same as in our original objection letter of 11 May. At that time, we highlighted that 119 windows among 8 sites would no longer receive adequate daylight.
- Privacy and Outlook: as before, 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).
- Weaknesses in Retail Layout: we note some minor improvements to the ground floor layout to improve links to the Brixton Village arcade and Brixton Station Road. We remain in favour of the ground floor retail use, with a central performance space, but continue to doubt that the first floor retail or café uses will attract enough footfall, unless escalators are also included. Experience of demand for other Brixton sites in recent years is that a significant part of the demand from potential tenants will be for café/ restaurant uses, so provision for extract ventilation needs to be designed-in from the outset. It is still not clear how this will be done in relation to the two towers above.

- Planning Benefits: we are pleased to see these summarised in the Planning Statement (Addendum 2) but the concessions remain modest in comparison with the adverse and lasting impact of the development. Several turn out to be the inevitable obligations for any development of this scale. The supposed uplift in local employment is mainly from the office floorspace, which now looks likely to fall well short of the figures quoted. A relocated entrance to the railway station will have limited impact without reinstatement of the service on the Catford branch on Brixton Station Road. Instead, the Council should be seeking a contribution to the reinstatement of East Brixton Station, to provide local access to the London Overground rail service. In itself, this would make the site more attractive to future office occupiers.
- Noise Impact on nearby dwellings: our previous comments on the proposed top-floor restaurant above the eastern block, and late-night uses generally, still stand.