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LB of Lambeth Planning Application 20/01347/FUL GLA Application Reference 2020/6774/S2 TEXT OF THE BRIXTON SOCIETY'S COMMENTS SUBMITTED TO THE MAYOR ONLINE on 4 February 2021

The Mayor should find in the Lambeth referral our objection letters of 11 May 2020 and 1 August 2020. We stand by those objections to the many and very significant departures from the Lambeth Local Plan which this planning application contains.

In the light of Lambeth's decision to grant planning permission based upon the premise that the benefits of this application outweigh the harms of the departure from the Local Plan, we wish to add the following comments.

Firstly, given the number and scale of the policy breaches, the most robust evidence of very substantial benefits should be required to grant permission; such evidence has not been forthcoming.

We accept that the site is an inner-city brownfield site being substantially underutilised; it is ripe for appropriate redevelopment. A substantial development could be built here which is compliant with Local Plan policies. Very many of the benefits claimed for this proposal could, and should, be required of any redevelopment proposal which complied with the Local Plan. Offering benefits which should accrue from any compliant proposal should be no justification for a non-compliant proposal, particularly one such as this that deviates so far from the Local Plan.

Over and above that general consideration, we believe that the key benefit claimed from the creation of employment space is illusory. At the core of this proposal are 19 floors of office space of which 10% is to be affordable, say, 2 floors. There is evidence of local demand for affordable space by local SMEs and no doubt those 2 floors would be let. The 17 floors of old-fashioned office space will prove a white elephant. The evidence of demand for such space put forward by the developer was a report written in February 2020 before most people had even heard of Covid-19. Since then, the whole landscape has changed and will not revert to the status quo ante. When the first lockdown was lifted last summer, 50% of the people working from home continued to do so even though they could have returned to their offices. Employers are seeing the benefits of cutting back on office space. We have examples of unlet office space in the area; examples of substantial offices being converted to housing use; examples of demand for other types of workspace.

The ambition appears to be to attract a single major office employer to the development as an Anchor tenant, but this seems a faint prospect. Even before the impact of Covid-19 and changing work patterns, Brixton has failed historically to attract major office users away from Central London. Past demand for larger offices came largely from public authorities, whose needs have scaled back considerably over the past 40 years. Local demand is primarily from smaller enterprises, but the build costs for such a complex high-rise building will be reflected in rents beyond their means.

A smaller, policy compliant development would obviously have less overall space but could easily contain far more realistically lettable employment space.

Our overriding fear is that if this development were to be built, we would be faced in a short time afterwards with the developer using permitted development rights to convert the unlet office space to substandard housing with no affordable element.

The Mayor will know that the local community is up in arms against this massively overbearing proposal which would radically change the character of the area, all for supposed benefits which, at best, should accrue from any policy compliant proposal and, at worst, will never happen.