

The Brixton Society

Understanding the Past, Looking to the Future

Reg'd. Charity No.1058103, Registered with the London Forum of Amenity Societies

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Proposed Development at 20-24 Pope's Road, London SW9 8JB

Dear Sir,

In response to your letter of 25 November, we have examined the further revisions to the original planning application made on 31 March 2019 (Lambeth reference 20/01347/FUL).

I confirm that the Brixton Society continues to object to this application, and wishes to participate in the public representation hearing before the Mayor.

1. Introduction

The Brixton Society was established in 1975 as the amenity society covering the whole Brixton area. We are registered with the London Forum of Amenity Societies, and keep in touch with the Brixton Business Improvement District and Transition Town Brixton.

We regularly comment on local plans, policy changes and individual planning applications, and try to promote good practice in local regeneration and urban design. In particular, we aim to safeguard the character and prosperity of Brixton Town Centre and its Conservation Area, and have supported its Townscape Heritage Initiative.

In our representations to Lambeth Council in May and August 2020, we objected strongly to the proposed development. This was because we considered that the 20-storey tower would cause considerable harm to the Brixton Conservation Area and that the economic benefits claimed by the applicants would not outweigh this harm. The height is unchanged, so no mitigation has been offered by the applicants.

2. Analysis of Employment Benefits

The only revisions proposed are contained in the Planning Report Addendum which sets out changes to the claimed economic benefits. In our analysis of this document, we refer to the Employment and Skills Strategy prepared by

Volterra and Partners in March 2020 (“Volterra 2020”) and the Planning Addendum Statement submitted by DP9 in November 2021 (“DP9 2021”).

2.1 Affordable Workspace

Volterra 2020: Offer to provide 1,770 square metres, 10% of net internal floorspace, as affordable workspace for 25 years to be managed by Impact Brixton.

The offer of 1,770 square metres was in line with (but no more generous than) Lambeth Local Plan policy ED2 which specifies that all developments with more than 1,000 sqm of office space within the Brixton Creative Enterprise Zone should provide 10% of usable floorspace as affordable workspace for 25 years.

DP9 2021: Enhanced offer is to extend the term of the affordable workshop space to 2090, which equates to a maximum term of 65 years, assuming the earliest date when the building could be completed and occupied is 2025.

We do not consider the enhanced offer to extend the affordable workshop term to 65 years to add any meaningful value to the original offer, as modern high-rise commercial buildings are generally expected to have a life span of 30 to 40 years, after which they are considered to be obsolescent and demolished.

Examples of buildings in Brixton built in the 1970s, which have either been demolished or are threatened with demolition, include Hambrook House (former Lambeth council offices demolished in 2017) Olive Morris House (former Lambeth council offices, completed in 1978, demolition approved 2015 on basis the building was no longer fit for purpose) and International House (threatened with demolition).

In addition, we note that rents for the affordable workspace would be calculated as 50% of anticipated market rent. A building as tall at this proposal is expensive to construct and maintain. Even a 50% reduction in anticipated rent levels is unlikely to be affordable for the majority of local start up businesses.

We also note that Impact Brixton will occupy an undisclosed proportion of the affordable work space. As Impact Brixton already occupy premises in Central Brixton as existing tenants of the applicants, the result will be to reduce the amount of affordable space that would otherwise be available to new and start-up businesses, and will not increase the overall amount of affordable workspace in Brixton.

2.2 Financial Contributions

Volterra 2020: Offer to pay a S106 Employment and Training Contribution to the LPA made up of a £150k initial upfront contribution then £56k a year for 25 years.

The amount offered was merely the sum required by the Lambeth Local Plan and calculated by reference to a formula set out in Annex 9 to the Plan.

DP9 2021: Enhanced offer to pay £1,000,000 into a Brixton Job Training Fund (£40,000 pa over 25 years) to be used to support local training and employment initiatives.

While this payment would be over and above the contribution required by the Local Plan, the amount offered is relatively modest, taking account of the income the applicants are likely to receive from commercial tenants.

As an example of local training and employment support costs, Annex 9 of the Lambeth Local Plan calculates that it costs on average £6,500 to provide training employment support to help one unemployed person secure an entry level job. Using this figure as a guide, a contribution of £40,000 per year would cover the cost of training and preparing just 5 local unemployed people to find jobs.

We also note that there is no indication that the applicants will provide any payment other than the initial £1 million endowment. If no further payments are made into the fund and annual payments of £40,000 are made from the fund over 25 years, then the real value of the annual payments will be considerably reduced over the life of the fund.

2.3 Local employment and apprenticeships

a) Full time jobs

Volterra 2020: Paragraphs 1.11 and 7.12 stated that the applicants will "use reasonable endeavours" to achieve the target of 16% of construction stage and 20% of end-use jobs to be occupied by Lambeth residents

The 16%/20% jobs target is not referred to by DP9, so we assume it is not being revised. It is **less** than Lambeth's current Local Plan target which is for 25% of jobs to go to Lambeth residents. In practice, the applicants are likely to have difficulties meeting even the lower target as they will be relying on end use tenants to provide job opportunities. As Volterra 2020 states, "tenants choosing initially to occupy the proposed development will most likely bring their existing workforce with them". If tenants relocating into the new office space choose to bring their existing workforce with them there is little the owner can do to persuade them to do otherwise.

b) Apprenticeships

Volterra 2020 says that the applicants will use reasonable endeavours to achieve a target of 26 apprenticeships either at construction stage or end-use stage to be provided to Lambeth residents, and 10 jobs at end-use stage for local unemployed adults.

DP9 2021: The enhanced offer increases the number of apprenticeships from 26 to 39, the additional apprenticeships to be provided by tenants in the completed building.

The original offer of 26 apprenticeships and 10 end-use jobs was in line with (and offered no more than) the Lambeth Local Plan requirement that large developments should provide one apprenticeship per 1,000 sqm office space.

The revised target is unlikely to be achieved, since the developer will not occupy the completed building themselves, and it will not be under the control of the developer to offer apprenticeships or jobs in the building after completion, since it will be down to the companies who lease space in the building to deliver end-use apprenticeships. It is entirely unclear how the developer will ensure that that tenants in the building provide apprenticeships to Lambeth residents.

This problem is recognised by DP9 in the Planning Statement Addendum where it is stated that (para 1.30) “Whilst the applicant cannot control tenant job training policy, they would seek to use reasonable endeavours to encourage tenants to adhere to the obligation”. As DP9 acknowledge, the building owner can only encourage tenants to comply with Section 106 commitments to which they themselves are not parties.

2.4 Conclusion

The employment benefits offered by the applicants in 2020 - affordable workshop space, financial contribution and local apprenticeships - were no more than required by Lambeth’s Local Plan.

The “enhanced economic benefits” add very little to the original offer:

- The offer to extend the term of the affordable workshop space to 2090 is of little value as this is longer than the expected life of the building;
- The additional financial contribution will not make a significant contribution to local unemployment rates;
- and it is not within the power of the applicant to offer additional apprenticeships in the building after occupation.

3. Offices in Brixton

Lambeth planners appear to have been dazzled by the sheer quantity of office floorspace, without considering whether it would meet actual local needs. We have examined both long-term trends and recent developments in office and workspace needs in London generally and in Brixton in particular. The full review is provided as Appendix A following, but in summary,

- The Coronavirus pandemic has accelerated trends to increased use of remote working and to office layouts providing for both virtual and live team meetings. Individual firms are likely to reduce their floorspace needs.
- Informal networking within an office block, or within a cluster of nearby blocks, is valued by smaller firms, particularly in Creative fields.
- For large corporate offices, London’s Central Activities Zone (CAZ) or Docklands remain the preferred locations. Brixton has consistently failed to attract their interest.
- Local employment floorspace has been steadily reduced by residential development, but current demand is mainly from smaller firms in the

Creative sector. This was recognised by the Mayor in approving the Brixton Community Enterprise Zone in 2018.

The applicants have misjudged local workspace needs and proposed a large area of outdated office space. The office floors form separate compartments, with little shared space or scope for contact between different users.

In the likely event that the space fails to attract corporate office tenants, the applicants have a ready-made fall-back position of converting the empty tower into residential apartments.

This is already implied by the external design of the tower, which strongly resembles an earlier residential tower in New York by the same architect. (130 William Street, illustrated in Wallpaper magazine in March 2021.) The balcony treatment on the upper floors is strikingly similar, yet a series of external balconies would not be a normal requirement for office floors.

Although Lambeth planners claim that residential use could be prevented by a planning condition, it would be very difficult to resist at Appeal. National Planning Policy in recent years has moved strongly both to reduce planning controls and to encourage residential use of commercial buildings.

If the developers were successful in using the Permitted Development route for residential conversion, they would have no obligations to provide a proportion of affordable housing, or to meet all the Mayor's standards for housing design.

4. Brixton Town Centre Context

We have previously highlighted the adverse impacts on the Brixton Town Centre Conservation Area and surrounding residential properties.

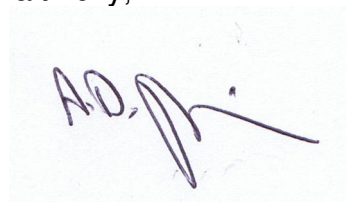
We are encouraged to find ourselves in agreement with Historic England in their comments to Lambeth dated 18.5.20.

5. Conclusions

The supposed benefits turn out to be very modest, when set against the many breaches of important planning policies and the harm to the Town Centre.

Taking into account these departures from planning policies, this application should be decisively refused.

Yours faithfully,



Secretary.

THE FUTURE OF OFFICES IN BRIXTON

1. Introduction

This paper outlines the context for any office development in Brixton Town Centre, taking account both of wider trends and of local needs. Over the past 18 months, the impact of Covid has been to accelerate change in how offices operate, though it's still a little early to see all the implications.

2. Office Interiors

Flat screens and cabling are now well catered for in modern office furniture, but manufacturers are keen to offer options beyond the standard office chair and table/desk, such as meeting booths, individual pods for speech privacy, and mobile lockers for hot-desking. Current fashions are for muted colours. Large-format video screens are increasingly used for meeting rooms. (1)

Office landscaping has received a boost in response to Covid, and suppliers report that office managers have become more willing to spend on plants and planting installations to make offices more attractive to staff returning from working at home. Marketing and HR teams are taking a greater interest in the state of corporate offices, so budgets are a little more generous. There is already demand for separate spaces for Zoom/ Teams conference calls. (2)

3. The Post-Pandemic Workplace

Almost all offices are now operating, but some with only 20% of staff actually present. Some have adopted a Tuesday/ Thursday core week for planning in-house meetings.

A ripple of changes is expected when leases next come up for review or renewal, as office users re-assess how much floorspace they really need.

At 79-81 Borough Road, the workspace operator reported that one tenant cut back from 70 desk spaces to 36, though also adding 4 cellular offices and arranging increased use of meeting rooms, to cater for their modified way of employing the same staff with an element of home-based working. (3)

Expectations are that formal desk layouts will be interrupted by casual meeting areas, private booths, café facilities and dedicated space for video calls. This approach is already part of the offer at most shared workspace sites. (4, 5, 6)

4. Office Eco-Systems

There has been a growing awareness of the benefits of encouraging contact between different departments within a firm, and even of enabling casual contact with staff of other organisations within the building or nearby. Again, this is more deliberately developed at shared workspace sites, where it is often part of the appeal for smaller firms and start-ups, which might otherwise struggle in isolation.

It is essential to have some shared facilities where workers can mix, such as an atrium (a top-lit common area) with café/ bar, shared meeting rooms, cycle

storage with changing facilities, and even an on-site gym. Smaller break-out spaces with seating in shared circulation routes can also contribute. (7)

Similar effects can apply over a wider area, if there are firms in a particular industry sector in close proximity. This concept underpins the Creative Enterprise Zones (CEZs) launched by the Mayor of London in 2017, but builds on earlier local networks such as Clerkenwell Design Week.

Where there are a number of office blocks, a broader eco-system can develop, embracing all the local businesses which cater to the daily needs of office-workers or which offer specialist services to their employers, such as printing or recruitment agencies.

In Central London, the interdependence of this wider network of businesses was recently exposed when it suffered badly from the Covid outbreak and related lockdowns, because major employers had either ceased operations or had the majority of their staff working from home.

5. The London Context

Within Greater London, the Central Activities Zone (the West End, the City and all of SE1 including the northern end of Lambeth) remains the preferred location for corporate offices, despite strong competition from the Canary Wharf cluster of office towers. The City of London is determined to remain dominant, and has already approved 7 new office towers this year.

Suburban centres like Croydon are more likely to be used for back office or subsidiary functions by firms with a head office in the CAZ. Croydon itself has lost ground since the millennium, with some of its office blocks already replaced or adapted for residential use.

Creative Enterprise Zones tend to be in Inner London and attempt to protect and reinforce existing clusters of creative and digital industries (CDI).

6. Supply and Demand in Brixton

The historic trend in the wider Brixton area has been for employment space of all kinds to be displaced by residential development. The Brixton CEZ was approved by the Mayor in December 2018, with a view to protecting and expanding local CDI enterprises. It covers most of Brixton, extending to Loughborough Junction and parts of Herne Hill. In Brixton Town Centre, Article 4 Directions are currently in place to protect existing workspace from further loss to residential use by Permitted Development. (8)

The Council's own needs have substantially reduced in recent years, releasing office space in International House and Blue Star House, and enabling the redevelopment of Hambrook House and Olive Morris House, and the remodelling of Iver House, for mainly residential use. In addition to concentrating staff in the new Civic Centre and "New" Town Hall, many back office functions are now dealt with remotely by Capita at Winchester.

Other office users are predominantly from what can loosely be called the Creative and Media sector (or CDI), extending into construction-related professions.

Brixton is a preferred location for voluntary & community sector organisations active in the borough, but typically these are only small teams or individuals.

In recent years, efforts have been made to cater for small and start-up businesses, such as Impact Brixton (now in Electric Lane) and the 3Space use of International House on a “meanwhile” basis.

Our contact with developers over several years indicates ongoing interest in providing modern workspace in and around Brixton, but of relatively modest size and favouring desk-based work over craft processes.

At the same time, planning applications continue to trickle in for upper-floor offices over Town Centre shops to be returned to residential uses, which are now more valuable for the freeholders.

7. Limited Corporate Interest

Historically, Brixton Town Centre has failed to attract interest from large office employers outside the public sector.

When International House began building in 1974, it was intended as the head office for Tarmac Construction, but they soon dropped out and the building was eventually let to British Telecom (before its privatisation). When they moved on in the mid-80s, the building was used by Lambeth Council for a variety of departments, until completion of the new Civic Centre.

As part of the Brixton City Challenge programme in 1993-98, an ambitious development was originally intended around the Underground Station, to include land to the rear beyond Electric Lane. This had to be scaled back when it was realised that the office rents then prevailing in Brixton would not justify substantial office development above and behind the Station.

For the recent revision of the Lambeth Local Plan, it was therefore logical for Lambeth planners to stress the importance of meeting the needs of the Creative and Digital Industries sector.

Their CDI study of 2017 recommended the provision of medium-sized offices, co-working spaces, maker spaces and managed office space suitable for small and medium enterprises. The Brixton Economic Action Plan (published the same year) carried this forward in the local context. No requirement was expressed for generic or corporate office space.

8. Conclusions

Lambeth planners appear to have been swayed by the sheer quantity of workspace proposed in the Hondo development, but failed to examine its type and configuration.

The generic office workspace proposed in the Hondo development does not match the local need for smaller units for the CDI sector. It lacks the common facilities that would encourage use by smaller enterprises or enable it to contribute to a wider Creative cluster. Its old-style format might secure some uncritical tenants if it was in the City of London, but it will fail to attract enough users in its Brixton context.

Alan Piper, Dip.Arch., RIBA.

References

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 3. *Site visit to 79-81 Borough Road, SE1, Wednesday 17 November 2021.*
 4. *The Post-Pandemic Workplace by Roz Barr (Design, Autumn 2021 p.59).*
 5. *Workplace Health & Wellbeing (Architecture Today webinar, 22 September 2021).*
 6. *More home working means offices must adapt to prioritise collaboration, by Stephen Cousins, reviewing Gensler workplace survey (RIBA Journal, 30 November 2020).*
 7. *Anticipatory Architecture: the changing nature of office design (Architecture Today webinar, 26 May 2021).*
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- This in turn cited:*
- *Lambeth Creative & Digital Industries Study (2017);*
 - *Brixton Economic Action Plan (2017);*
 - *The Mayor's Culture Infrastructure Plan (2019).*