

Tell us who you are

Ref: R076

Title

Other

Preferred title (optional)

.

First name

.

Surname

DP9 Limited on behalf of Hondo Enterprises

Email address

hannah.willcock@dp9.co.uk

Agent's details

Are you an agent?

Yes

No

Title

Miss

First name

Hannah

Last name

Willcock

Job title (optional)

Organisation

DP9 Limited on behalf of Hondo Enterprises

Address

100 Pall Mall

Postcode

SW1Y 5NQ

Contact number

02070041700

Email address (optional)

hannah.willcock@dp9.co.uk

Representors details

Title

Mr

First name

Jamie

Last name

Giffard-Taylor

Organisation

Hondo Enterprises

Your representation

Please complete this set of questions for each representation you wish to make.

To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED2 - affordable workspace

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please see cover letter

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not justified

.

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please see cover letter

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, do you consider it necessary to participate at the oral part of the examination?

- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

Your representation 2

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

PN3

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

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- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not justified

Please see cover letter

Complies with the Duty to co-operate

- Yes
- No

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(optional)

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Your representation 3

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED15 Employment and Training

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

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- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not justified

Please see cover letter

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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Your representation 4

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy d1

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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Your representation 5

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy D2 (a)

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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- No - I do not wish to participate at the oral examination
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Your representation 6

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Site Allocations 16

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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Your representation 7

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED1 - Land Use Office

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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Your representation 8

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

ED6 - Railway Arches

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

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Your representation 9

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED7 - Town Centres

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

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(optional)

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Your representation 10

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED12, Policy ED8, Policy Q26, Policy T3

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

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This form allows up to 10 representations. If you wish to make more representations, please start another form.

Require further notification

Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination
- The publication of the inspector's recommendations following the independent examination
- The adoption of the Revised Lambeth Local Plan and Policies Map.

Review your answers

Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.

Planning
London Borough of Lambeth,
1 Brixton Hill,
Brixton,
London,
SW2 1RW

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507
telephone 020 7004 1700
facsimile 020 7004 1790
www.dp9.co.uk

13th March 2020

Dear Sir/Madam,

REPRESENTATIONS TO THE REVISED DRAFT LAMBETH LOCAL PLAN JANUARY 2020

We write on behalf of our client, Hondo Enterprises to submit representations to the Revised Draft Lambeth Local Plan and its supporting evidence base.

Hondo Enterprises (HE) has an interest in Market Row, Brixton Village and Pope's Road. Brixton Village and Market Row are set within the heart of Brixton Town Centre within proximity of Brixton Station. The owners' key vision is to provide a thriving destination for shopping, eating and community events building on the unique character of the markets and Brixton's rich, diverse heritage.

In addition, Hondo Enterprises is in discussions with LB Lambeth regarding the redevelopment of the current Sports Direct site for commercial development located adjacent to Pope's Road.

On behalf of HE, DP9 submitted representations to the previous consultation version (Reg. 18) of the Draft Revised Local Plan (October 2018). We have reviewed the Council's response to these representations within the Consultation Report. Accordingly, we wish to comment again on the draft policies below and we look forward to continued engagement throughout the Local Plan process

This letter outlines a number of key comments and observations which we would like to record on the draft of the Lambeth Local Plan mainly relating to the policies relevant to Market Row, Brixton Village and Brixton Town Centre.

We are supportive of the overarching objectives set out in policy D1, specifically encouraging and supporting sustainable development that enhances local distinctiveness of neighbourhoods, specifically;

- The growth and development within the borough through the regeneration of Brixton;
- The centre-specific approach to managing the mix of uses in town centres; and
- Supporting various initiatives such as neighbourhood plans, town centre

partnerships, Business Improvement Districts, similar business networks and business-led and other neighbourhood management schemes in order to promote centres, assist in attracting inward investment, and co-ordinate and manage improvements to the public realm.

We also welcome Lambeth's approach to sustainable development set out in Policy D2 a) which states that *"when considering planning proposals, the council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Lambeth."*

Policy PN3 Brixton

We are strongly supportive of the overarching ambition to ensure that Brixton's role as a distinctive major multicultural and diverse town centre will be safeguarded and promoted through careful and sensitive regeneration, recognising its local heritage and historic built environment, with a specific focus on different character areas, and supporting economic, social and environmentally sustainable development.

We continue to be supportive of providing a 50/50% split between A1 and A3 units within the ground floor of the markets. The Markets collectively offer a balanced mix of services for the community – from the fishmongers and green grocers, to retail and restaurants that reflect the diverse nature of Brixton and we are keen for this to continue.

We note that the policy continues to refer to floorspace as follows *"that no less than 50 per cent of floorspace should be in A1 use and no more than 50 per cent floorspace should be in A3 use within each indoor market (Brixton Village, Market Row, Reliance Arcade), subject to a management plan being in place that is agreed between the council and the managers of the indoor markets."* The policy then goes on to state that *"the thresholds for A1 and A3 floorspace requirements relate to ground floor units and connected upper floors that share the same access."*

Whilst HE has no in principle objection to providing the floorspace areas for the market, there continues to be some concern as to how this will be managed effectively now that the policy proposes to include the upper floor units that are ancillary. At present, there is a small proportion of floorspace on the first floor that is used as ancillary space. Therefore, it is extremely important (especially given the current changeable market) that there is opportunity for flexibility to cater for the market demands for retail and, on this basis, the policy wording should not be too prescriptive. Instead, we continue to be of the view that current policy wording is appropriate and should be measured and controlled on a total unit basis, as opposed to exact floorspace. For example, the size of some of the spaces on the first floor are currently larger than some of the units on the ground floor and therefore if some of these spaces are then included within the area overall, this will inhibit the provision of A3 floorspace on the ground floor. We request that the policy does not become too prescriptive as this will prohibit HE to proactively manage and cater for current and future tenant demands

In order to ensure that the viability and vitality of the markets is maintained, we believe that the policy should continue to refer to the number of units as opposed to specific floorspace areas. If not, and the floorspace approach is carried through, we ask that this solely relates to the ground floor to ensure that the flexibility is maintained.

Part B of Policy PN3 adds that '*A4 uses in the indoor markets will not be permitted on both the ground floor and upper floors. All independently accessed upper floorspace in each indoor market currently in D1 or B1 use will be protected*'. It is assumed that this policy does not fully restrict A4 uses within the markets, but simply restricts proposals for A4 use on both ground and upper floors. Nevertheless, we would welcome clarification regarding the wording of this proposal. Regardless, we would recommend that this is modified to allow for each proposal to be determined on a case-by-case basis as there will be some instances where A4 use is appropriate.

Part C of Policy PN3 refers to the evening economy management zone which doesn't include the markets. Our understanding is that Part B of the policy relates specifically to markets and that the criteria within parts C and D of PN3 do not apply to the markets as they will have their own independent management plan which has already been agreed between the council and HE.

The principles set out in the policy parts F and G, which refer to traffic reduction initiatives and improving the quality of public transport provision, are supported. The traffic reduction, the creation of high-quality public spaces and the improved linkages within the town centre and connections with adjoining areas would enhance the overall character and successfulness of Brixton.

Site Allocation 16

The aspirations of Site Allocation 16 (Brixton Central) within Policy PN3 are strongly supported, in particular the identification of the site as suitable for mixed use development with retail, commercial, community, leisure and town centre uses.

In terms of activation at ground floor level, the aims of the policy to reprovide adequate market facilities, maintain ground floor active frontages and provide significant public realm improvements are all strongly supported and considered to be an essential asset and benefit to any scheme that would come forward on the site.

Policy ED1 Land Use Office

We are supportive of the aspirations set out in Part A of policy ED1, for large offices and continued employment within Brixton. We would however, welcome clarification as to whether draft policy text set out in part C iv, where B1a floorspace to be lost is '*to be replaced in the vicinity and within Lambeth*' applies to Brixton Town Centre, including the Markets. We believe that this principle should be applicable to Brixton Markets. The markets are envisioned for retail use, and any existing vacant office space would ultimately be more appropriate in other nearby sites.

Policy ED2 Affordable Workspace

HE is supportive of the principle of affordable workspace. Affordable workspace often provides good conditions for start-ups and small businesses. Some employment sites may not be appropriate for small businesses and are more suitable for buildings with larger floorplates for larger businesses. Developers should have the opportunity to work with the Council to find a solution that addresses the policy requirements but not compromising the overall scheme viability. This could include discounted memberships to a managed workspace facility.

Within policy ED2, in Brixton, part iii requires developments in the Brixton Creative Enterprise Zone (CEZ) proposing at least 1000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace as affordable workspace for a period of 25 years. The policy then goes on to state that within the CEZ, office developments over 10,000sqm should provide 10 per cent of that floorspace at 50 per cent of market rents for a period of 15 years.

Affordable workspace requirements should be assessed on an individual site basis and therefore a blanket requirement for all sites to provide affordable workspace is not considered appropriate. Paragraph 6.14 of the supporting text states that *“the policy will apply to all applications involving 1,000sqm or more gross B1a office floorspace (GIA) in the areas of Lambeth identified in part (a) the policy. This includes applications for the redevelopment and extension of existing offices. The policy will also apply to planning applications that involve refurbishment of existing office space where this would result in an increase in the quality and rental value of the space.”* The 10% requirement for low cost / affordable workspace is too prescriptive and should only be sought on the net additional uplift of employment floorspace.

HE welcomes the flexibility in parts i,ii and iii which gives developers the opportunity to manage the affordable workspace in different ways, either through;

- Leased and managed by an affordable workspace provider on the council’s approved list in accordance with an agreed workspace management plan.
- Managed directly by the owner where it is demonstrated to the satisfaction of the council that they have the necessary skills and experience and an agreed workspace management plan is in place; or
- Leased by the owner to one or more end users on the council’s approved register of organisations that require non-managed affordable workspace.

Part f) of the policy states that *“proposals that do not provide the level of affordable workspace required by this policy will be required to submit viability information, which will be independently assessed.”* Where this assessment determines that a greater level of affordable workspace could viably be supported, a higher level of affordable workspace will be required. In addition, early and late viability reviews will be applied to all schemes that do not provide the level of affordable workspace required by the policy.” Whilst we agree with the principle that any affordable workspace proposed under the policy requirement should be subject to viability, it does have the potential to present a significant bar to the development of new and enhanced office floorspace in the area. The subject to viability caveat implies the submission of evidence to the Council to demonstrate the ability to provide affordable workspace at the reduced levels sought. This has the potential to add time and cost to the planning process and the timeframes for the review of information should be agreed between the parties at an early stage.

Policy ED6 Railway Arches

We strongly support the continuation of Policy ED6, *‘the use of railway arches within London Plan Opportunity Areas and major, district and local centres for A, D, B1 and appropriate sui generis uses will be supported.’*

HE is supportive of policies which encourage the provision for a wide mix of uses which will help create vibrant places. HE considers the above uses appropriate for railway arches in ensuring that the vitality of Brixton is sustained.

Policy ED7 Town centres

HE is strongly supportive of Lambeth's policy ED7 that supports the vitality and viability of Lambeth's hierarchy of major, district and local centres. Brixton has developed an international reputation based on its markets, cultural and creative energy and diversity. It is therefore crucial that retail, service, leisure, recreation and other appropriate uses are continued to be provided in these areas and that the predominant retail function of Brixton is maintained.

Policy ED12 Markets

We welcome the continuation of Policy ED12, *'proposals for new off- street permanent, indoor or street markets, car boot sales and temporary markets will be supported'*. As outlined above, Brixton has an international reputation based on its markets and this should be supported where possible.

Policy ED8 Evening Economy and Food and Drink Uses

With town centres being the most appropriate locations for evening economy and food and drink uses, we strongly support the continuation of Policy ED8. The council's ambition to continue to encourage the growth of the evening economy whilst minimising negative impacts upon the local residents is in line with Hondo Enterprises aspirations for the markets.

Policy Q26 Tall Buildings

We are supportive of Part A of Policy Q26, which specifically states that tall buildings will be supported when they are in locations identified as appropriate for tall buildings in Annex 11, and where they meet the criteria set out in Part A of this same policy.

In light of the fact that the Pope's Road site is located within Site Allocation 16, It is considered that the Site at Pope's Road would be an appropriate location for a tall building of this type due to its excellent location within the centre of Brixton. The Site's location is in extremely close proximity to nearby transport links, has a key position and relationship with existing social and cultural nodes and has the potential to play a key role as a landmark for the area. In light of this, it is considered that a sensitively designed scheme which is mindful of any impacts on heritage assets and respects the character of the surrounding local area would be acceptable in this location.

Policy T3 Cycling

HE supports draft Policy T3 which requires the provision of appropriate cycle storage facilities within new development, however Policy T3 should also recognise that there are scenarios where providing cycle storage in accordance with the minimum standards contained within Policy T5 of the London Plan may be difficult to achieve, and that therefore a flexible approach being considered on a case by case basis is also warranted.

For example, for the existing markets in the Town Centre and proposed market spaces as part of the Pope's Road development, according to the policy would have to provide a significant

amount of visitor spaces in areas where space is constrained due to the presence of railway lines and other infrastructure. Meeting the current draft London Plan standard for visitor retail is therefore likely to result in a reduction in the quality of the associated cycle storage facilities, appropriate to the number of spaces provided.

In addition, there are sites where a flexible approach may also be warranted due to the public transport accessibility level, such as within Brixton Town Centre which has an exceptional PTAL rating due to its location adjacent to Brixton Station. Many train users ride folding bikes and therefore on such sites, we believe policy should recognise the popularity of folding cycle usage.

Policy ED15 Employment and Training

The draft policy states that a minimum of 25% of all jobs created by the development (in both the construction phase and for the first two years of end-use occupation of the development) should be secured for local residents.

Whilst HE supports the principle and objective of policy ED15, we are concerned that in relation to very large office developments such as that proposed at Pope's Road, the Council's proposed target may not be realistic to achieve. This is because office jobs are less likely to be newly created than retail or restaurant jobs.

It is noted that new draft policy text states that, if the developer makes all reasonable endeavours to meet the obligations required, and demonstrates to the satisfaction of the Council that there are circumstances specific to the scheme that mean either direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome, then the council may consider a financial contribution in lieu.

However, the payment in lieu approach does not directly engage with the point made that in specific circumstances, such as provision of large office schemes where a very high proportion of end-use jobs created will be office occupiers, it is very likely that most of these employers will be relocating their existing office from elsewhere and bringing an existing workforce, rather than setting up a new business and creating 100% new jobs.

Additionally, we believe the Council should carefully consider and justify whether it believes the 25% policy requirement is realistic when considered cumulatively alongside draft policy ED2 which requires affordable workspace to be provided based on a percentage of floor area.

We trust that our representations will be fully considered and taken into account as the preparation of the Local Plan continues. If you require any clarification on any matters or wish to discuss our representations further, please do not hesitate to contact Oliver Sheppard or Hannah Willcock of this office.

Yours faithfully,

DP9

DP9 Limited