

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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Site Allocations DPD – Proposed Main Modifications

Following the consultation on the modifications to the above Development Plan Document, our latest comments are set out below.

1. Overview

Our views and proposals remain unchanged from our detailed submission dated 1st May 2024. That included specific modifications to the DPD.

Our particular concerns are sites 17, 20, 21 and 23. We also commented on site 22 on the eastern edge of our area because any high-rise development would impact on the Loughborough Junction local centre and the Loughborough Park Conservation Area.

2. Site 17: 330-336 Brixton Road SW9

Our comments on the elements within this site are essentially unchanged since February 2022.

Modifications:

MM33, MM34, MM35 and MM36 are all acceptable as improvements on the original text.

3. Site 20: Tesco, 13 Acre Lane SW2

The Council planners have disregarded all the numerous representations except those from the site's freeholder, and instead substantially increased the scale, massing, height and density of the proposed development. We are in agreement with the representations made by nearby residents including those in Baytree and Porden Roads, Arlington Lodge and Trinity Gardens.

Instead of allowing unrestrained development, the proposal map in the DPD should provide more detailed guidance on building heights, based on 3

storeys closest to neighbouring properties in Porden and Baytree Roads, and no more than 6 storeys on less sensitive parts of the site.

Modifications:

MM37, MM38, MM39, MM40 and MM41 are all acceptable as improvements on the original text.

4. Site 21: 51-57 Effra Road SW2

Soundness: Despite recent modifications, the proposals are still unsound.

We welcome the reduction of the site to an area with a single ownership, thus enabling the Mosaic Clubhouse and Unitarian Church to continue. The urgency of replacing Fitch Court has evaporated with the approval last year of replacing its external doors and windows. In any case, the Council's mismanagement of the Somerleyton Road housing development (Site 14) means that replacement sheltered housing will not be available for several years.

Our main concern is the impact of new buildings of **excessive height** on the surrounding sites and streetscape. The frontage height should be more consistent with existing buildings on this east side of Effra Road, with lower structures to the rear to reduce adverse daylight impacts on neighbours and provide some opportunities for including trees and other greener features.

In addition, there should be a stronger steer towards providing the **employment floorspace** in a separate block adjacent to the existing Link Business Centre. This would allow a wider range of activities, including manufacturing and those with special ventilation requirements.

The PSV did not acknowledge the **increased traffic flows** along Effra Road as a consequence of the Railton Road LTN. This reinforces the need to limit vehicle access to a single point, and to discourage any reliance on vehicles stopping on Effra Road itself.

Modifications:

MM42, MM43, MM44, MM45, MM46 and MM47 are all acceptable as improvements on the original text.

5. Site 22: Wellfit Street, Hinton Road & Hardess Street SE24

Our views are substantially unchanged since the previous (Reg.18) consultation. Subsequently the Council has given consent for a high-rise development of similar bulk, but based on a "co-living" concept for single people rather than for families. This is an untried format in this borough, so it may still be worth pursuing a site brief here in case the consented development fails to go ahead.

In that case, our main concern is that the maximum building height should not exceed 30m (10 storeys).

We also pointed out that the Council is sacrificing the last opportunity to safeguard a long-overdue access to the London Overground railway service (Windrush Line). This location has the advantage of interchange with the Thameslink service through the existing Loughborough Junction station.

Modifications:

MM68, MM69, MM70, MM71 and MM72 are all acceptable as improvements on the original text.

6. Site 23: corner of Coldharbour Lane SW9 & Herne Hill Road SE24

While the set-back from the existing frontages is welcome, the proposed building height remains excessive. The proposals show a poor understanding of urban design principles. We note that other objectors share our views (*including the Herne Hill Society and R1349, R1364, R1462, R1545, R1732, from Reg.18 Consultation Report, pages 1048-1061*).

Rather than creating a precedent for high-rise development, the nearby Higgs development actually constrains what can now be built on this corner site, to minimise issues of mutual overshadowing and overlooking. The ambition for servicing or yard space in the last paragraph of Land Uses (p.154) is unrealistic within this modest site, so should be deleted.

Modifications:

MM73, MM74, MM75, MM76, MM77 and MM78 are all acceptable as improvements on the original text.

No evidence was submitted regarding Site 24.

A handwritten signature in blue ink, appearing to be 'A.D.' followed by a stylized flourish.

Hon. Secretary