

Site Allocations Development Plan Document – Proposed Main Modifications

**Consultation responses pursuant
to Regulation 25**



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Representations received via email

MR01 – Stephen Cross

From: Stephen Cross <s[REDACTED]>

Sent: 02 September 2025 09:29

To: SADPD

Subject: Site Allocations Development Plan Document (SADPD)

When Lambeth Government officials are looking at the relevant Heritage and Conservation Sites they should bear in mind the meaning of TO CONSERVE - according to the Cambridge Dictionary it means "TO KEEP AND PROTECT SOMETHING FROM DAMAGE, CHANGE OR WASTE". Thinking that development will ENHANCE a Heritage or Conservation Site is A BIG MISTAKE.

Thank you.

Kind regards

Stephen Cross

MR02 – National Highways

From: Diana Ngobi [REDACTED]

Sent: 03 September 2025 18:51

To: SADPD

Cc: Janice Burgess; Planning SE

Subject: NH/25/12693 Lambeth Site Allocations Development Plan Document Main Modifications consultation

FAO: Lambeth planning policy team

Consultation: Site Allocations Development Plan Document Main Modifications consultation

Our ref: NH/25/12693

Dear Planning Policy Team

Thank you for your consultation of 1 September 2025 consulting us on the proposed main modifications to the Site Allocations Development Plan Document.

National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this consultation, particularly the M1, M4 and M11. The closest section of our network to Lambeth borough is M4 Junction 1, approximately 10 miles west of the borough.

National Highways a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development

planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. For National Highways, our interests lie where sizable development proposals are identified to have a traffic impact on the SRN, or where development is provided bound against or positioned close to our network, in that it could impact on drainage, boundary treatment, noise, etc. As the borough of Lambeth is situated some distance from the SRN, no boundary issues are identified as a concern and as such, we have no comment to make on this consultation.

If you have any questions about our response, please feel free to contact us directly via

[REDACTED]

Kind regards

Diana

Diana Ngobi, Assistant Spatial Planner

Spatial Planning South East

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

[REDACTED]

Web: nationalhighways.co.uk

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MR03 – Huma Farooqui

From: huma farooqui <[REDACTED]>

Sent: 21 September 2025 19:00

To: SADPD

Subject: SADPD Response

I would like to add some key points in development impacts, daylight/sunlight, boundary treatment, and amenity. Arlington Lodge is a five-storey residential block which directly adjoins Site 20 (Tesco, 13 Acre Lane, SW2).

The SADPD (submission version) and its evidence base already identify Arlington Lodge as a sensitive neighbour and specifically reference the high boundary wall shared with Tesco as an important amenity safeguard. I welcome the recognition of Arlington Lodge in the plan. However, unless strengthened, the proposed Main Modifications risks undermining the soundness of the plan (NPPF §35) and its legal compliance under the Planning and Compulsory Purchase Act 2004.

Boundary Wall – 1985 Condition & Covenant

- Multiple consultation responses (Regulation 22) and Council commentary confirm that the 1985 planning permission for Tesco included a condition to retain the boundary wall to Arlington Lodge and Baytree Road at its current height.
- That wall, together with established planting, has since provided privacy, noise attenuation, and environmental screening for four decades.
- Until the original condition and/or covenant is formally disclosed by Lambeth’s planning archive or Land Registry records, the SADPD must not endorse any reduction in the wall contrary to those historic obligations.

- **Requested Modification:**

- Replace the current wording: “There may be benefits... in reducing the height of the boundary wall shared with Arlington Lodge” with:

“The boundary wall shared with Arlington Lodge is subject to historic planning controls (1985 Tesco permission). Any alteration must demonstrate compliance with those

conditions/covenants, and in all cases must maintain or enhance privacy, noise attenuation, and security for Arlington Lodge residents.”

Trees and Planting along the Wall

Requested Modification:

Insert new bullet under Site 20 policy:

“Existing boundary planting along Arlington Lodge must be retained and protected. Where loss is unavoidable, development must provide like-for-like or enhanced replacement planting within or adjacent to the boundary, secured by condition and long-term management.”

- Removal would conflict with London Plan G5 (Urban Greening), G6 (Biodiversity) and Lambeth Local Plan EN4 (Trees and Nature Conservation).
- These are particularly vulnerable if the wall is lowered.
- Existing trees and shrubs along the boundary wall form an integral part of local amenity, providing screening, biodiversity, and climate resilience.

Daylight, Sunlight & Overshadowing

Design Evidence (DE20) confirms that Site 20’s proposed massing runs parallel to the Arlington Lodge wall and will cast additional afternoon shadow to the east. BRE analysis must therefore name Arlington Lodge windows as receptors.

Requested Modification:

“Planning applications must include BRE 209/BS EN 17037 compliant daylight/sunlight studies, identifying Arlington Lodge façades and gardens as specific receptors, and demonstrate no unacceptable harm. Where harm is identified, alternative massing must be considered.”

Privacy & Overlooking

- The parallel wall arrangement creates a direct overlooking risk.
- Without explicit controls, stepped height increases may erode privacy.

Requested Modification:

“Within 12m of the Arlington Lodge boundary, upper storeys must step down and employ design measures (orientation, obscure glazing to secondary rooms, balcony screening) to prevent direct overlooking.”

Noise & Servicing

- Current plan says “it may be beneficial to fully enclose servicing.” That language is weak.

- Servicing noise, if not contained, would directly affect Arlington Lodge.

Requested Modification:

“All retail servicing areas must be fully enclosed and acoustically treated, with controlled hours and doors-closed operation, unless it can be robustly demonstrated that an alternative causes no harm to Arlington Lodge.”

Microclimate & Wind Tunnelling

- Residents have already experienced wind tunnel effects from Somerset House, damaging existing planting and prevention of future planting.
- Without careful modelling, new massing will exacerbate the problem.

Requested Modification:

“Applications must submit a pedestrian-level wind/microclimate assessment, with Arlington Lodge boundary and planting as named receptors, and demonstrate mitigation of any adverse effects. Design must avoid repeating the damaging wind tunnel effects already observed from nearby developments

Traffic, Parking & Air Quality

- A reduction in car parking is supported, but protections are needed:
 - Permit-free housing (except blue badge).
 - No new vehicular access at the south-east pinch-point by Arlington Lodge.

- A robust Delivery & Servicing Plan to avoid disruption.
- In its current form, Site 20 policy does acknowledge Arlington Lodge but does not fully secure its protection. Unless the modifications above are adopted, the SADPD is not sound because it would fail the NPPF tests of effectiveness and justification.
- I therefore request that the Inspector recommend the modifications set out above in order to ensure that Site 20 remains deliverable, legally compliant, and protective of existing residents' amenity.

Best regards

Huma

MR04 – Port of London Authority

From: Michael Atkins [REDACTED]

Sent: 16 October 2025 14:17

To: SADPD

Subject: Port of London Authority response: Lambeth Site Allocations Main Modifications Consultation

Dear team

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned consultation, on the proposed main modifications Site Allocations Development Plan Document (SADPD). I have now had the opportunity to review the consultation documents and can confirm the PLA support the proposed main modifications, particularly:

Site 1: Royal Street SE1

- MM06
- MM07

Site 2: St Thomas' Hospital

- MM13
- MM15

Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground

- MM28
- MM31

I hope these comments are of assistance.

Regards

Michael

Michael Atkins

Senior Planning Officer

Port of London Authority



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MR05 – Surrey County Council

From: Tamas Gyorfi <[REDACTED]> on behalf of Planning Consultations/EAI/SCC

[REDACTED]

Sent: 22 October 2025 11:33

To: SADPD

Subject: FW: Site Allocations Development Plan Document (SADPD) Main Modifications consultation

Good morning,

Thank you for consulting Surrey County Council on the Site Allocations Development Plan Document (SADPD) Main Modifications consultation. Please note that we have no comments to raise.

Kind regards,

Tamas Gyorfi

Planning Policy Technical Support Officer

Environment and Planning

surreycc.gov.uk

Please be aware that due to the nature of my work I may not always be in the office or contactable. In my absence and where your enquiry is urgent please email

[REDACTED]

MR06 – Michael Bright

From: Michael Bright <m[REDACTED]>
Sent: 24 October 2025 14:50
To: SADPD
Subject: SADPD Consultation on Major Modifications

Attachments available until 23 Nov 2025

Thank you for the opportunity to comment on the published Major Modifications to the SADPD. Attached are our comments on MM39 (relating to Site 20).

Mike Bright

On behalf of the contributors to the Regulation 19 Representation R0280

v3 LAMBETH CONSULTATION ON MAJOR MODIFICATIONS TO THE DRAFT SADPD.pdf

MR06 –ATTACHMENT

LAMBETH CONSULTATION ON MAJOR MODIFICATIONS TO THE DRAFT SADPD – COMMENTS ON MM39 (relating to Site 20)

Submitted by Michael Bright on behalf of 7 residents/community groups established in the vicinity of Site 20 (Tesco, 13 Acre Lane), 124 residents living close to the site and the (now) 981 signatories to an online petition who are all party to the Regulation 19 Representation R0280

1. The proposed Major Modifications affecting Site 20 include MM39, which proposes to amend the relevant paragraph of the SADPD text as follows:

“A suitable off-street servicing strategy for the supermarket and residential uses must be demonstrated. Servicing of the replacement supermarket should follow the existing retail servicing route i.e. be accessed from Acre Lane (exact location to be determined at application stage) with exit via Baytree Road.”
2. For the reasons set out in our original representation about the proposals (R0280), we believe these two sentences are mutually contradictory and therefore do not make up a sound proposal. This is because the existing servicing route is inherently unsuitable – as well as unsafe – since:
 - a. Baytree Road is a narrow residential street, with a newly built residential block of flats immediately opposite the vehicle servicing exit.
 - b. The delivery lorries arriving at the supermarket from Acre Lane can only access the loading bay by being driven across the service yard, temporarily running through the exit gateway and crossing the full width of Baytree Road to within a few feet of the facade of the residential block and then reversing into the bay.
3. The attached video taken from the pavement at the end of Baytree Road recently during a typical delivery illustrates the scenario described above.
4. When the existing supermarket was built in the mid 1980's the Baytree Road site opposite the service exit was occupied by commercial/industrial uses which faced towards Acre Lane. Whilst the newly-built residential block has a ground floor designated for commercial use, that does not negate the disturbance (and potential risk of collision) for the residential occupants now living above the ground floor.
5. Also, deliveries regularly take place during anti-social hours. Continuing with the existing servicing route (and the other current arrangements including the size of lorries,

the shape/dimensions of the service yard and the delivery schedules) constitute - at best - a serious nuisance to the residents and are inherently unsafe and impractical.

6. At no stage during the consultations on the SADPD and the responses to them, has any explanation been given for proposing to continue the odd use of Baytree Road to filter the arrival and exit of the supermarket's large delivery vehicles.
7. This arrangement is not used for the other supermarket on Acre Lane (Lidl) nor the large Sainsbury's in Clapham Town where, in both cases, deliveries are serviced for both entry and exit via the adjacent main roads (Acre Lane and Clapham Park Road respectively). What prevents this in the case of Tesco other than the service yard being designed too small for the Tesco lorries to turn around within it?
8. Given the opportunity offered by a comprehensive redevelopment of the whole site it must be possible to ensure a better-engineered solution than the current arrangements provide and, in order to be "suitable" and "sound", the SADPD modification should be amended to require this explicitly.

MR07 – London Parks and Gardens Trust

From: Peter Sibley [REDACTED]
Sent: 26 October 2025 10:11
To: SADPD
Subject: SADPD comments

London Parks and Gardens Trust.
Duck Island Cottage
St James' Park

To: SADPD administrators.

I am writing on behalf of the Planning and Conservation Group of the London Parks and Gardens Trust. The LPGT is part of the national group of Gardens Trusts which come under the Leadership of The Gardens Trust. The Gardens Trust is a statutory consultee for planning applications affecting Registered parks and gardens. The Gardens Trust delegates its duties for Grade 2 sites and unregistered sites to the appropriate County Trusts. In London, this is the LPGT. I am therefore commenting on those aspects of your SADPD that could affect green and blue spaces in your area.

MM04. The LPGT approves of this wording and particularly the emphasis on Archbishop's Park and Lambeth Palace Garden.

MM07. The Trust's view is that the wording of the statements here are adequate but could be strengthened.

MM14. The Trust welcomes the emphasis on flood preparedness by requiring a 16metre clearance for all developments close to the river defences that do not have a FRAP permit. The Trust would like to see this applied to all proposed developments in the vicinity of the River Thames including those on existing green spaces. We would like to see this extended to the proposed holocaust memorial and education centre in Victoria Tower Garden, given that part of the site is within the World Heritage Designation area.

MM20. Although not strictly within our remit, the Trust feels that the historic use of the river as a working resource for transporting goods should be respected and the original wording restored.

MM23. The Trust strongly believes that the original wording should be adhered to. The proposed wording is in breach of commitments in the London plan to provide open public access to developments in or abutting heritage blue and green sites. The curtilage of the OXO Tower is of particular importance locally and in London as a whole. The proposed wording allows developers to make their own decision on accessibility rather having this being controlled by Lambeth's Planning service.

MM29. The Trust welcomes the proposed change to the first and the wording of the second paragraph in respect of Bernie Spain Garden and Queens Walk, as over shadowing is a particular problem for urban greenspaces.

MM31. The Trust approves of the text about access to open space and nature conservation but would prefer to add 'and associated green spaces created where possible'.

MM33. The Trust approves the text proposed and in particular the recognition of the importance of the setting of heritage assets, rather than concentration on the heritage asset on its own. This consideration should also be applied to Victoria Tower Garden as part of the setting to the Houses of Parliament.

MM51. The Trust welcomes the statement in MM51 in addressing open space and nature conservation deficiency and stressing this aspect of the Local Plan Policy.

MM59. This is in line with MM 51, and the Trust approves of this consistency within the SADPD.

MM61. The Trust welcomes and supports this proposed wording as it agrees that these areas are potentially designated heritage assets and contain a community garden as well as good post-war public design incorporating associated green space.

MM67. Again, the Trust approves this amended paragraph stressing the settings of heritage assets, particularly in its association with Ruskin Park.

MM68. The Trust agrees that this is not an appropriate site for a tall building.

MM71. The trust welcomes this modification to the SADPD, stressing the importance of public open space and nature conservation, and infrastructure elements to enhance their use and value. Again, in line with the local plan.

MM77. The Trust notes that this wording is in line with MM71 and covers the same developments. We support this proposal and are pleased to see that the area is treated as one site.

MM79. The Trust is pleased to see the consideration given to the heritage elements in these areas and in particular to the recognition of the importance of Ruskin Park.

MM83. The Trust welcomes this proposal which seeks to balance any development with the benefits accruing to the users and heritage of Ruskin Park.

Peter Sibley, B.Sc., M.Sc., M.Sc., PGCE, Dip. Cons., (Parks, Gardens and Landscapes).

MR08 – Brixton Society

From: Alan Piper <[REDACTED]>

Sent: 26 October 2025 16:55

To: SADPD

Cc: [REDACTED]

Subject: Site Allocations DPD

Attachments: BS Site Allocations Oct 25.doc

For completeness, I now attach our comments on the Main Modifications to the Site Allocations DPD.

Regards,

Alan Piper,

Secretary, the Brixton Society.

MR08 - ATTACHMENT

The Brixton Society

Understanding the Past, Looking to the Future

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

Website: www.brixtonsociety.org.uk

Please reply to:

Alan Piper, Dip.Arch.,
Lambeth Planning,
(Development Management)
PO Box 80771,
London,
SW2 9QQ



sadpd@lambeth.gov.uk

26 October 2025

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.



Hon. Secretary

MR09 – Norwood Society

From: Marian Girdler <[REDACTED]>
Sent: 26 October 2025 20:36
To: SADPD
Subject: Consultation on the main modifications SADPD Site 18

I am writing on behalf of the Norwood Society. We consider that the modifications proposed for Site 18 have taken no account of the submissions made by the Stakeholder Group or the Norwood Society as presented to the examination of the SADPD. Local residents feel that they have have been ignored. If you read the text for Site 18 and didn't know the area you would be think that it was a failing shopping centre, which it is not.

The consultation letter states that the proposed modifications are considered necessary to ensure the plan is sound and legally compliant. We consider that the main modifications do not address the reasons in our previous submissions dated 2.5.24 and 31.1.25 as to why we did not consider that the document was sound or legally compliant. The policies in the SADPD once approved will guide development and be a material consideration in planning decisions, hence why it is important that these policies reflect local residents views.

These are the reasons why we don't think the SADPD for Site 18 is sound or legally compliant:

- NPPF states that the plan making system should be a platform for local people to shape their surroundings local residents This site received the most representations of all the SADPD sites however their comments are not reflected In the policy.
- There is still no consideration of the loss of the historic terraces and this dismissal is not reflected in other parts of the borough where such terraces are included in conservation areas.
- The inaccurate description of the site (p115) fails to recognise the contribution the retail units within Site 18 make to the vitality of the town centre by stating they do not provide a strong active frontage on the high street. This includes the Victorian terraces that are all occupied and provide a variety of town centre uses.

- One of the development principles is to respect the historic victorian terrace opposite (east side of Norwood road) the site but not those within the site which are older. “Provide a clearly defined parapet line to Norwood Road to respect context and create a balanced townscape with the Victorian frontage opposite”

The Victorian terraces are not considered heritage assets however it states on (p122) “development should sustain and preserve or enhance the significance of all heritage assets (including preserving elements of their setting that make a positive contribution to the asset) of all heritage assets”. The text implies this only relates to heritage assets outside the site. The biggest impact on these assets is the demolition of the victorian terraces and the erection of a tower of 31m high.

- The vision map allows for a set back for a 6m pavement to enhance the public realm which means demolition of the victorian terraces would be acceptable. It is not acknowledged that this would blight these retail units and could damage the vitality of the town centre.
- The proposed vision map shows an increase in the area of shading to allow a tall building up to 31 m high although indicative it could be considered a larger tall building.
- The site description (P115) states heights are given in m and AOD. The proposed Vision map still only shows AOD apart from the 31m height of the tower.

For the reasons set out above we consider that the proposals for Site 18 still do not reflect the views of the local community. The modifications have taken no account of the detailed submissions or representations made at the public hearings as to why this plan is not sound or legally compliant.

Regards

Marian Girdler

Chair of the Norwood Society Planning Sub Committee

MR10 – Norwood Action Group

From: Sandy Nuttgens [REDACTED]

Sent: 27 October 2025 10:16

To: SADPD

Cc: Anne Crane; Susan Osborn

Subject: Norwood Action Group Response to the SADPD Modifications

Importance: High

Dear SADPD,

Here is our submission before tonights deadline of Oct 27th 2025.

Rather than respond to individual modifications to the SADPD proposals, the Norwood Action Group (NAG) would like to make a general comment/observation.

Site 18 is a hugely complex site that will be very difficult to develop in any beneficial mass development way. Nothing can happen before 2034 when the B&Q lease is up. Therefore it is our opinion that the whole SADPD plan should be cancelled and an alternative scheme be put in place such as has been seen in other boroughs.

A very good example is what Wandsworth are doing in Tooting - preserving the character of the area whilst building new housing above existing shops.

https://www.wandsworth.gov.uk/media/8125/tooting_area_strategy.pdf . A people first approach would make much more sense in our area and if affordable 3/4 storey housing were built above the existing shops there would be no need for enormous tower blocks or wiping out the businesses on Norwood Rd for a decade or more.

Regards,

Sandy Nuttgens (On behalf of the Norwood Action Group)

Sandy Nuttgens

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR11 – Natural England

From: SM-NE-Consultations (NE) <[REDACTED]>

Sent: 27 October 2025 10:54

To: SADPD

Subject: FAO Planning Policy REF: Site Allocations DPD - Main Modifications

Your Ref: Site Allocations DPD – Main Modifications

Our Ref: 525165

Dear Sir or Madam

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the Main Modifications for the Site Allocations Development Plan Document for the London Borough of Lambeth.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

Sharon Jenkins

Operations Delivery

Consultations Team

Natural England

Worcester Team



Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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MR12 – Coin Street Community Builders

From: Paula Carney [REDACTED]

Sent: 27 October 2025 14:12

To: SADPD

Subject: Lambeth Site Allocations Development Plan Document Proposed Submission Version:

Proposed Main Modifications 2025 - Representations on behalf of Coin Steet Community Builders

Attachments: 2025-10-27 CSCB reps main mods final.pdf

Dear Sir/Madam

We act on behalf of Coin Street Community Builders (CSCB), who own the freehold of two sites which are identified in the Site Allocations Development Plan Document (SADPD) and which are affected by the current Proposed Main Modifications. These two sites are:

- Proposed Site 8: 110 Stamford Street SE1
- Proposed Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground SE1

The attached response to the Proposed Main Modifications is in relation to both these two site allocations and follows the making of representations to the Proposed Submission Version of the Site Allocations DPD and attending the Examination in Public earlier this year.

If you have any queries, please don't hesitate to contact me.

Kind Regards

Paula

Paula Carney

Director

Tel (mob): [REDACTED]

Email: [REDACTED]

Address: Scott House, Suite 1, Office 3.01, The Concourse, Waterloo Station, London SE1 7LY

Birmingham Cardiff Exeter London

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MR12 - ATTACHMENT



Office 3.01, Scott House
Suite 1, The Concourse
Waterloo Station
SE1 7LY

Your reference: CSL114/PJC

27 October 2025

London Borough of Lambeth
PO Box 80771
London
SW2 9QQ

By email: sadpd@lambeth.gov.uk

Dear Sir/Madam,

**Lambeth Site Allocations Development Plan Document Proposed Submission Version
Proposed Main Modifications 2025**

Representations on behalf of Coin Steet Community Builders

We act on behalf of Coin Street Community Builders (CSCB), a social enterprise which owns 5.5 hectares of land in the north Southwark and Waterloo neighbourhood. The company is limited by guarantee whereby all the income generated is used to deliver public service objectives as opposed to being distributed to shareholders. As a result, CSCB's motivations and decision making is not like a commercial developer.

CSCB's freehold includes two sites which are identified in the Site Allocations Development Plan Document (SADPD) and which are affected by the current Proposed Main Modifications. These two sites are:

- Proposed Site 8: 110 Stamford Street SE1
- Proposed Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground SE1

This response is in relation to both these two site allocations and follows the making of representations to the Proposed Submission Version of the Site Allocations DPD and attending the Examination in Public earlier this year.

Site 8: 110 Stamford Street SE1

Proposed Modification MM17: Amend first bullet point to read:

- **community/office community or office floorspace at ground floor, providing an active frontage to Stamford Street”**

The reason given for this proposed modification is *‘To provide clarity that either community or office floorspace may be provided, and that it is not necessary to provide both.’*

This proposed modification does not make the allocation effective and thus sound. In order to be effective and sound the allocation needs to allow for community and/or office floorspace throughout the whole building and also retail at ground floor. As currently stands, the wording in the Site Allocations DPD Proposed Submission Version, with or without, Proposed Modification MM17 means that the site will not be developed during the plan period. The reasons for this were set out in CSCB’s representations to the Proposed Submission Version of the Site Allocations DPD, Statements to the EIP and at the EIP round table discussions.

In summary, Site 8 is prioritised for community needs by CSCB, and such needs are increasingly urgent. In our submissions to the EIP we made clear that CSCB’s own needs cannot be met within the current neighbourhood centre. CSCB are currently investigating how they can increase space for their current needs and this may require utilising space currently used (1) for midwifery services (clinic and waiting room in the basement) and (2) the neighbourhood room (a multi-use area at ground level originally intended as a community café). CSCB would want these relocated to the phase 2 neighbourhood centre that has always been envisioned for Site 8. In giving consent to phase 1 the Officers’ report to committee (03/01794/FUL) states at 6.2.2 “In the DRUDP the site is part of a Major Development Opportunity 126, which includes the frontage of Stamford Street between Cornwall Road and Coin Street. This states that the whole area should be developed for community/arts facilities to help provide for the shortfall in community facilities in Waterloo. This policy should be accorded significant weight as no objections have been received through the consultation on the DRUDP.”

Since then there has been a significant increase in residential, student and working populations in the area. Lambeth’s Infrastructure Delivery Plan (IDP) identifies the need for a ‘New Primary Care Centre in Waterloo’ with “NHS Lambeth CCG working with Lambeth Council” as “Lead Delivery Agency”. Under ‘Land Requirements’, in the same IDP, it states “Potential for colocation with redeveloped Oasis Academy Joanna [sic] Primary School/New Waterloo Library”. We are unaware of any progress on this project. However, we are aware that the two GP Practices serving the Waterloo area have subsequently lost their premises. Lambeth Walk Group Practice has been ‘temporarily’ relocated to



the Akerman Health Centre (55 minutes on foot, 33 minutes by public transport 1-way), and the Waterloo Health Centre has been temporarily moved into portacabins at 114-118 Lower Marsh. [Lambeth initially granted a 2-year consent for these portacabins but the South East London Integrated Care Board has recently applied for a 5-year consent].

It is unclear where the Site Allocations DPD envisages permanent premises for primary healthcare facilities for Waterloo's existing population are to be located – let alone premises for the increased residential population envisioned in this document.

Earlier this year, the Government published its 10-year health plan for England. It stated:

"We will reinvent the NHS through 3 radical shifts:

- *hospital to community*
- *analogue to digital*
- *sickness to prevention."*

From hospital to community: the Neighbourhood Health Service, designed around you

If the NHS does not feel like a single, co-ordinated, patient-orientated service, that is for a simple reason: it is not one. It is hospital-centric, detached from communities and organises its care into multiple, fragmented silos. We need to shift to a model able to provide continuous, accessible and integrated care.

The Neighbourhood Health Service is our alternative. It will bring care into local communities, convene professionals into patient-centred teams and end fragmentation. In doing so, it will revitalise access to general practice and enable hospitals to focus on providing world-class specialist care to those who need it. Over time, it will combine with our new genomics population health service to provide predictive and preventative care that anticipates need, rather than just reacting to it.

At its core, the Neighbourhood Health Service will embody our new preventative principle that care should happen:

- *as locally as it can*
- *digitally by default*
- *in a patient's home if possible*
- *in a neighbourhood health centre (NHC) when needed*
- *in a hospital if necessary*

To make this possible, we will:

- *shift the pattern of health spending. Over the course of this plan, the share of expenditure on hospital care will fall, with proportionally greater investment in out-of-hospital care. This is not just a long-term ambition. We will also deliver this shift in investment over the next 3 to 4 years as local areas build and expand their neighbourhood health services.”*

CSCB has said that they will consider a range of neighbourhood health facilities – from a GP practice to a Neighbourhood Diagnostic Service as part of its phase 2 Neighbourhood Centre development. It will not build housing (1) because social rent housing is not a viable proposition and covenants prevent it from building market housing, (2) because community facilities are its priority for this site, and (3) its phase 1 development was constructed to make its extension on to Site 8 cheaper to develop and to manage.

We therefore conclude that the Site 8 allocation – modified or not – is unsound.

Proposed Modification MM21: At end of site allocation, add new row. Left hand column: "Expected delivery timescale". Right hand column: "After 2035".

The reason given for this proposed modification is: *‘To add clarity on when the sites in the SADPD are expected to contribute towards the council’s housing trajectory.’*

As stated above, Site 8 will not come forward to deliver housing within the plan period, before or after 2035.

Site 9: Gabriel’s Wharf & Princes Wharf, Upper Ground SE1

Proposed Modifications MM25:

Amend last sentence of paragraph 1 to read: “~~This may include an element of extra care housing where need is demonstrated~~ The residential element of development must include C3 housing and may include an element of extra care housing or a nursing home where need is demonstrated.”

Add new paragraph to read: "Meanwhile uses will be encouraged in advance of comprehensive redevelopment. Investment to enable this will be supported."

The reason given for this proposed modification is:

‘First change responds to comments from the site owner in relation to delivery timescales. It improves the soundness of the SADPD by providing further information on deliverability. It also provides clarity that development of this site must include C3 housing, and may also include a nursing home where need is demonstrated.

‘Second change reflects council support for meanwhile uses to ensure that sites remain in beneficial use prior to redevelopment.’

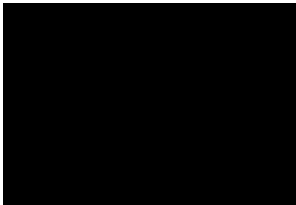
CSCB very much welcomes and supports the first change in that it allows for a nursing home to be accommodated on Site 9 where need is demonstrated. However, we would still highlight that it is CSCB's position that any housing would need to provide the cross subsidy for the nursing home.

The second change is welcomed and supported by CSCB, especially as:

- a) the existing uses on Gabriel's Wharf are planned to close at the end of September 2026 as the temporary buildings here will no longer be fit for purpose. CSCB are committed to investing in alternative meanwhile uses until they are ready to undertake the permanent redevelopment of Site 9 .
- b) Studies are in hand to bring Princes' Wharf (currently empty) into effective meanwhile use as soon as it is feasible to do so.

If you have any queries in relation to any of the above comments, please don't hesitate to contact me.

Yours faithfully



Paula Carney
Director
CarneySweeney

MR13 – Environment Agency

From: Shea Bunyan [REDACTED]

Sent: 27 October 2025 15:58

To: PlanningPolicy

Subject: RE: Site Allocations Development Plan Document (SADPD) Main Modifications consultation

Attachments: LB Lambeth SADPD - main modifications.pdf

Dear Lambeth Planning Policy Team,

Thank you for consulting us on your Site Allocations Development Plan Document (DPD) Main Modifications.

Please find our formal advice following review of the draft document attached. We are pleased to note that the vast majority of our previous recommendations were included in updated document and only have a few more suggestions to provide.

If you would like to discuss anything further, please do not hesitate to be in touch.

Kind regards,

Shea Bunyan

Planning Advisor South London Sustainable Places

Environment Agency | Seacole Building, 2 Marsham Street, London, SW1P 4DF

[REDACTED]
Working days: Monday - Friday

Phonetic spelling: Sh-ay Bun-yun

MR13 - ATTACHMENT

Planning Policy team
London Borough of Lambeth

Sent via email

Our ref: SL/2024/123617/SL-01/EW1-L01

Your ref:

Date: 27 October 2025

Dear Planning Policy team,

Consultation on proposed 'main modifications' of the London Borough of Lambeth's Site Allocations Development Plan Document (SADPD)

Thank you for consulting us on the proposed main modifications to your Site Allocations Development Plan Document (SADPD), which we received on 1 September 2025.

We provided our response to your proposed submission version Site Allocations DPD on 3 May 2024 (reference SL/2007/101496/SL-04/SB1-L01) and note that there are key areas where our advice has been considered appropriately and environmental concerns have been given due weight, especially in relation to:

- flood risk;
- land contamination and protection of controlled waters;
- biodiversity;
- impacts on the River Thames and associated tidal flood defences.

We are pleased to note that the vast majority of our comments have been incorporated into the document.

However, we would like to take this opportunity to reiterate the following site-specific comments with respect to the site allocations themselves:

| Site allocation | Comments |
|--|--|
| Waterloo and South Bank | |
| Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground, SE1 | Flood risk activity permit <ul style="list-style-type: none">• A flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16 metres of a tidal main river or flood defence structure. |
| Kennington / Oval | |
| Site 7: 6-12 Kennington Land & Wooden Spoon House, 5 Dugard Way, | Flood risk mitigation <ul style="list-style-type: none">• We note that the existing NHS healthcare facility, known as Wooden Spoon House:<ul style="list-style-type: none">○ would be considered 'more vulnerable' in relation to flood risk; |

| | |
|------|--|
| SE11 | <ul style="list-style-type: none">○ is located in the northern section of the site, within the modelled 2100 breach flood extents.● We also note that the removal of the existing healthcare facility appears to be on the basis that a strategy can be agreed to re-provide it elsewhere, off-site.● If the existing healthcare facility remains on site, there could be a potential conflict with the current wording within the 'SA policy – flood risk mitigation' section which states that:<ul style="list-style-type: none">○ “ground floor levels and below in areas located as at risk during a ... [modelled breach flood event] ... will be restricted to 'less vulnerable' use only”;○ ““more vulnerable' uses will not be allowed below [modelled] breach [flood levels]”. |
|------|--|

Thank you for the opportunity to provide comment on the proposed main modifications to this document.

We hope you find our response helpful. Please contact us if you have any questions.

Yours sincerely,

Kayleigh Wyatt
South London Sustainable Places – Planning Specialist

E-mail: [REDACTED]

MR14 – Sureway’s International Church Ministries

From: Akibodun Akiwumi [REDACTED]
Sent: 27 October 2025 17:03
To: SADPD
Cc: akit.t21; Pastor Steve; Eric Ofori - Darko
Subject: Site 23 (SA23/SICM) SADPD modification comments
Attachments: SICM - SA23 - SADPD Modifications (F) .pdf

To whom this may concern,

I hope this email finds you well.

I am writing on behalf of SA23 - Sureway's International Church Ministries regarding our current position and comments for modifications of the Site Allocation Development Plan and its supporting documents such as the Design Evidence Papers.

The attached document reflects our comments on the current SADPD and comments taken from the Examination Hearing that took place on the 6th March 2025 at Lambeth Town Hall.

Finally, this document goes onto explain SA23's current position regarding its plans and how it's proposed development that will be brought forward to the council in the coming months, takes into consideration and optimises the demands from Lambeth, Action Groups and the people of Loughborough Junction. Such as the need for an active frontage, stepped back perimeter, improved public realm, Policy PN10, scale, massing, urban greenery, its relationship with Higgs Yard and the station in the form of a mixed-use town centre building and/or "Landmark Building" as stated by the planning inspectorate R. Aston during the examination hearing in March.

We hope that these comments and modifications can be taken into consideration when creating the new SADPD by the Council in tandem with our proposal so that this "prominent corner site" can reach its full potential for now and the future.

Kind Regards

Kiko Akiwumi Sent from Outlook for Mac

MR14 - ATTACHMENT

Sureways International Chuch Ministires

SADPD Modifications & Comments

SA23 Land at the corner of Coldharbour Lane / Herne Hill Road, SE24



Modifications to SADPD extracts Site Allocation Development Plan Document & Design Evidence Paper

(the survey allows only 5 modifications that have been taken directly from the current SADPD)

1) Height, Scale and Massing

*“Under the Indicative Approach – Massing and General Height 4.5 A 10 storey (40m) building which announces the presence of the Railway Station opposite in medium range views but does not overwhelm its constrained, intimate townscape context between the railway viaducts, and **which defers to greater height (16 storeys) of the Higgs Yard approval to the immediate south**”*

The key comment in which SICM wishes for a modification on post Examination Hearing on the 6th March 2025 is the need for the redevelopment to **“defer to greater height 16 storeys”** regarding its relationship with the Higgs Yard development. The proposed development will adhere to all right of light, heritage, views, townscape, daylight and sunlight policies through a stepped, pizza-dialed massing ensuring the highest points aligns and takes reference from the height of Higgs Yard.

Yet, with a clear understanding from Doug Black and others in the hearing that Site 23 has been **“given primacy”** and is the **“prominent corner site”** for the area of Loughborough Junction a modification has to be made in order to rightfully permit the redevelopment of Site 23 to be higher than Higgs Yard.

This supported in the conclusion (6.0) of the Design Evidence papers stating that the **“building line should align with that of the Higgs Yard Approval.”** The modification should take into consideration the number of demands that Site 23 must deliver on, and that the adjoining site didn’t have to adhere nor meet to, which gives a need to Site 23 to be raised higher in order to meet such demands. This will be explained in more detail throughout this document.

For example; being a town center development and aligning with Policy PN10, offering retail and leisure areas, improvements to the public realm, an enhanced mixed use development, improved amenity, revitalizing the arches, viaducts, whilst bringing forward new housing, a place of worship, whilst pushing the building line back on its curved frontage to enhance the safety and accessibility of the area, other developments and people migration to and from the station and many more.

The modification regarding the height, scale and massing must be one that clearly defines and states Site 23’s ability to define itself once, in doing so, it meets regulations in the form of policies as well as its need to serve the public, its ancillary spaces, the train station and most importantly itself in its redevelopment.



Modifications to SADPD extracts Site Allocation Development Plan Document & Design Evidence Paper

2) The Retention and Restoration of Site 23's Existing Car Parking Spaces

The following extract is taken from Page 10 of the Design Evidence Paper under the subheading of *Building Uses* “2.13 The building is used as a place of worship. Associated community uses also occupy the building. **“A car park at the rear of the site is used by the congregation”**”

Given the context of Site 23 and its proximity to Loughborough Junction Station, its relationship to a number of public transport service and its high PTAL rating this site could be classed as a car free development. Yet given Site's 23 context of what its existing building's use is, and what its proposed building use will be, there has to be significant consideration given to Site 23's ability to retain and restore its 15 car parking spaces which is currently at the rear of the site and used by the congregation especially those members and family travelling distances. It is worth noting that the previous Higgs Yard Development had planning approval for on-site parking.

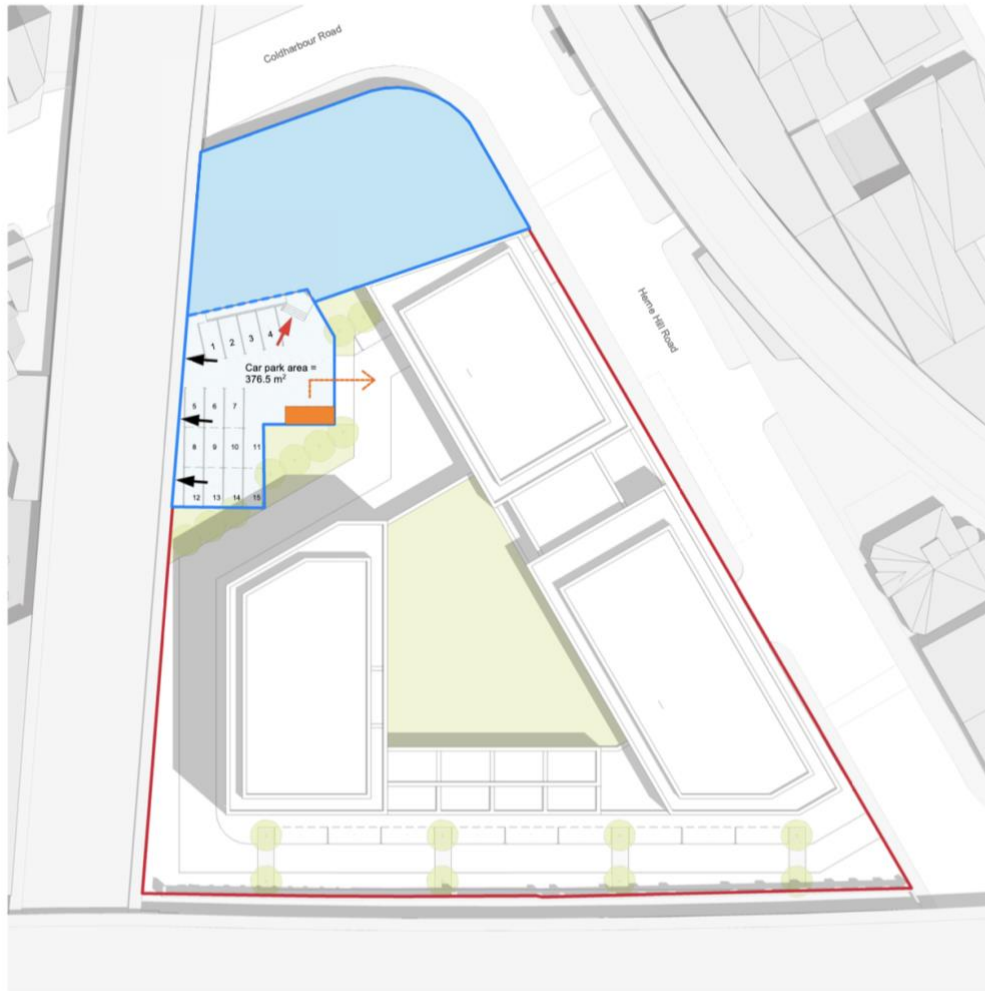
This context and consideration must be given to what will become a town center use in the form a mixed-use development. As Site 23's proposed purpose will be to enhance the public realm, through retail, leisure, place of worship, improved amenities and more, there must be a clearly defining allowance to retain its car parking spaces. This can be for key members of the place of worship, workers of and for retail and leisure sectors of the development and its ancillary spaces such as the arches and viaducts. Furthermore, the multi-functional purpose of the development will need parking material in which members of the public can safely park their vehicles, including services and drop-offs. Moreover, aligning with policy PN10's requirement **“for proposals to contribute to the safety of the public realm”** car parking spaces allows for 24/7 security and other services to be deployed for safety measures to be present in and around the site at all times.

This retention has also been acknowledged by the adjoining site Higgs Yard's architectural plans (as shown on the page 4 of this document) which were approved by Lambeth Council.

Finally, retaining of the SICM's car parking spaces will align with Page 14, of the Design Evidence paper under **Transport/Legibility** to **“maintain the street frontages as vehicle-free and continue vehicle servicing from the rear off Higgs Yard”** in which access of the retained car parking spaces of SICM, will be able to egress and ingress through, whilst still ensuring safe pedestrian access through Higgs Yard and SICM's redevelopment.

SICM (SA23) the new SADPD must outline and grant the ability for SICM to retain their parking spaces as part of a new development scheme, due to the purpose of its redevelopment and the multiple services and advantages that can stem from their restoration.





- Key
- Boundary
 - Church boundary
 - Church building
 - Parking area
 - Bin Store
 - Entrances to church arches
 - Rear entrance to church

Reference to Point 2 of modifications on Page 3 of this document. The Retention and Restoration of Site 23's Existing Car Parking Spaces.

Plan - Church Car Park - Existing Boundary Plan

Drawn: 05/02/18

Part of Higgs Yard permitted proposal reference 18/05425/FUL

Church Car Park Existing Boundary - Area

1 : 250

In the absence of information and reports listed hereafter, the undersigned hereby certifies that the information contained in this document is true and correct.

Rev. Date Description

Drawn: ML
 Checked: BCC
 Date: 05/02/18
 Scale: @ A1 As indicated

Loughborough Junction
 Church Car Park - Existing
 Boundary

AA6480-SK0012
 REV -

PRP



Modifications to SADPD extracts Site Allocation Development Plan Document & Design Evidence Paper

3) Site 23's existing physical relationship with Loughborough Junction Station

Site 23 has an existing physical relationship at the boundary with the railway track off of Coldharbour Lane, this relationship to achieve the necessary goals of a town center development whilst also taking into consideration a train station that has no disabled access, whilst currently dealing with an ever-growing demand. Hence this unique touching should be enhanced, not removed especially when there is a lack of connection on pedestrian level by the place itself, Loughborough "Junction."

The modifications to the SADPD must clearly redefine the relationship between Site 23's redevelopment and governing bodies such as Network Rail's (ASPRO) and The Arch Company to ensure the existing physical relationship between Site 23 & Loughborough Junction Station can be enhanced ***"in order to avoid any impact on the safe and efficient running of the railway."***

Site 23's physical relationship abutting the railway track can be seen on Coldharbour Lane but also at ground level through the railways viaducts that form part of Site 23's lower ground floor/street level as well as the arches that run alongside Site 23's boundary. It is through these services that a collaborative partnership for the redevelopment of Site 23 to serve the public realm in the form of a mixed-use town center development as identified in the Examination Hearing on the 6th March 2025. This serving of the public realm must also mean the train station, where its importance is second to none, due to the influx of developments and people migration in the area. Developments such as Hinton Road, Riverside development and Higgs Yard are just a few developments that increase the needs of the public realm.

Site 23's physical relationship with the outdated train station can tackle these issues and demands in a holistic and collaborative way. The current SADPD and its Design Evidence Papers have contradictory statements where in the 6.0 Conclusion of the Design and Evidence papers where it states under ***"Footprint"*** that there is a need to ***"pull the building away from the railway viaduct."*** ***When Higgs Yard is virtually a gated development with no natural pedestrian flow along the railway viaduct.*** Furthermore, can be understood from the want of a clear pedestrian accessway off of Coldharbour Lane, to facilitate the animation of the railway arches. Yet the lack of specification in wording on Page 13 of the Design Evidence Paper ***"Legibility - Development at a greater scale and height in close proximity to the Loughborough Junction Station will announce this note."***

The modification must clearly set out the desired relationship from the existing railway viaducts, arches 465 and 466 and allow flexibility in a proposed design that can incorporate a sustainable mixed-use town center development and the evident need from the ever-growing public realm of a suitable station. As mentioned by the **Network Rail Statutory Consultee** stating the need to ***"seek financial contribution towards improvement of Loughborough Junction Station to Mitigate the impact of the development and ensure the rail travel remains as an attractive option"*** ***"With improvements needed to the platform facilities, incl. waiting shelters, seating, remodeling of the existing platform buildings"*** Such comments were made regarding developments aforementioned.



SADPD Hearing - 6th March 2025

Quote Head Speaker - Mr Doug Black -

“But for these particular sites, obviously Higgs yard, I've just heard is the primary was given primacy in the townscape.”

1) Height Scale and Massing (as per Page 2)

As attendees to the SADPD Examination Hearing held at Lambeth Town Hall on the 6th March 2025 on behalf of Site 23 (SA23) Sureways International Church Ministries we were privy to key conversations held around Site 23, from the perspective of individuals in the area and action groups such as LJAG and more. Most importantly the voices of individuals such as Doug Black and R. Aston were key in developing and cementing that our design for Site 23 has foreseen and embodied many of the challenges and demands Site 23 faces now but will overcome in its redevelopment.

First and foremost as aforementioned the importance and relevance Site 23 holds in the regeneration of Loughborough Junction was reiterated by Doug Black (head speaker) at the Examination hearing - stating ***“Higgs yard was given primacy in the townscape”*** this was in response to height and massing of the already established and built development by Peabody Homes reference 18/05425/FUL.

This aligns with the Design Evidence Paper statements regarding Height on Page 22 - *“The site is not appropriate for a tall building, defined as above 45m in this location. Be subordinate to the Higgs Yard approval ***so that it retains townscape primacy.***”* This primacy and importance that has been allocated to SA23 cannot be therefore restricted to being or aligning with its adjoining development Higgs Yard completely. Due to the fact Higgs Yard developed its land with solely its own interest at heart; whereas SA23 - SICM's is as stated ***“a prominent corner site in a town center”*** who does not share the privilege of developing its site with only its own best interest at heart. The Planning Inspectorate R.Aston questioned this subordinate relationship of SA23

SA23 has to and will become a sustainable mixed use town center development that incorporates an improved public realm, wider pavements, integration and regeneration of arches and viaducts, with a setted back building line all of which the adjoining development didn't take into consideration.

Therefore this MUST be taken into consideration when amending the SADPD for a more open/creative approach to the massing being on the northside and within its urban context, in the Design Evidence Papers and during the planning process for SA23. In order to meet the constraints and demands of the public, its needs and Lambeth Council's too - in doing so, there has to be flexibility with the height, massing and scale of this development, especially if the proposal is not to be to the detriment of the Heritage (Ruskins Park) nor the station and its future.



SADPD Hearing - 6th March 2025

Quote Head Speaker - Mr Doug Black -

*“The problem the council may have is their beholding to others and Transport for London Network Rail to have any idea going to bring this forward, I guess that's why the other side of the infrastructure is probably referred to, maybe however that still needs to kind of be thought about again, I think. And as any part of any modifications that were proposed, you would have an opportunity to comment on, there'll be a bit of consultation period, minimum of six weeks. So hopefully the council will get somewhere with them. **There might be some specific schemes which they're happy to identify as part of the allocation,**”*

2) Site 23's existing physical relationship to Loughborough Junction Station (as per Page 5)

As mentioned on Page 5 of this document regarding modifications from the works of the SADPD and its supporting Design Evidence Papers regarding the existing physical relationship between Loughborough Junction Station and Site 23.

The Examination Hearing spoke in depth about the hazardous issues that the Station is, can and may cause in the future as the demands are ever growing on an station with no disabled access, outdated platform, very poor ingress and egress to and from the station and more. The quote taken is from Doug Black stating that **“There might be some specific schemes which they're happy to identify as part of the allocation.”** This referring to TFL, Network Rail, The Arch Company and associated bodies involved in what would be a redevelopment Loughborough Junction Station.

We believe that other than the Hinton Road development, SA23 is the prominent and best placed site to help ease the burden of people migration, public realm and disbursement of what already is an overcrowded and highly demanded train station.

In the modification of the SADPD it would be in the best interest of all parties involved to work in collaboration to find the best resolutions for the problems and demands placed open the primacy of SA23 and its surrounding areas, such areas include the station. Moreover, the design and conceptuality of a redevelopment Site 23 that links to the station and into the public realm areas of SA23's redevelopment have been explored by SICM'S design team and partners.

This point was reiterated and voiced in the Examination Hearing which stated SICM's Site **“is the only means of regenerating the new Townscape at Loughborough Junction including viable access and regularizing safe pedestrian amenities in and around the train station”**



SADPD Hearing - 6th March 2025

Quote - Planning inspectorate - R. Aston

*"I was going to ask the Council that Higgs retains its primacy. We've just heard that Higgs has primacy, I just wondered this is a corner plot. I've just seen here on behalf of Elwood Homes who are referring to a potential increase in capacity.....**Landmark building.. 3 elements. 1. - Design Approach why not more? 2. - Juxtaposition of use. 3. - Open space at this density**"31§*

Planning Inspectorate R.Aston, Bsc (Hons) Dip TP MRTPI
LB Lambeth Examination Hearing

As attendees to the SADPD Examination Hearing held at Lambeth Town Hall on the 6th March 2025 on behalf of Site 23 (SA23) Sureways International Church Ministries we were privy to key conversations held around Site 23, from the perspective of individuals in the area and action groups such as LJAG and more. As aforementioned there is and will be more of a demand on SA23 to ensure that it becomes a mixed-use town center development, the Council and local community agree on the need of an active frontage in alignment with Policy PN10 in its Town Centre use and other requirements - such as safety, access and amenity around the development to enhance the area and the people within.

The planning inspectorate during the hearing raised the question of potential increase in capacity leading to a **"landmark building"** with 3 elements that he followed on to mention. The key point is regarding element 1 - **"Design Approach why not more?"** This is something that we hope in the modifications and amendments to the SADPD and its supporting documents there can be an element of flexibility in what this building has to do to become what is asked of it.

There is a plethora of demands placed on SA23 and Loughborough Junction and therefore this leads us into the statement and terminology used by the Planning Inspectorate - that being a **"landmark building."** Site 23's building proposal that will be brought forward to Lambeth Council embodies this with the current design having 45 -60 flats/mezzanines at 20 stories, Banqueting Hall and associated spaces, a new SICM church and associated spaces, Ground and First floor commercial retail, communal lobbies, including a new access to station providing multiple points of entry and exit, 5 Railway arches to provide public entertainment and possible pop- up activities, Lower Ground Floor minimal parking/bicycle stores & ancillary spaces. With further amendments and revisions to be made it is these factors and design factors that can create a building that is befitting of the title given by the Planning Inspectorate. **"A landmark building"**

The aforementioned proposal has been shown to Loughborough Junction Action Group, whose opinion follows in the final section of this document.



Modifications & Examination Hearing

Quote - Planning inspectorate - R. Aston

“The Search for Landmark Building In The New Townscape at Loughborough Junction”

Planning Inspectorate R.Aston, Bsc (Hons) Dip TP MRTPI Chair of LB Lambeth Examination Hearing, 6.03.2025.

On Page 8 of this document was the mentioning of Site 23’s proposal that will be brought forward to the council in the near future. Yet to understand the demands of the area we spoke to action groups such as LJAG’s Tim Gaymer in whom we met at the Examination Hearing, an architect himself, he was aware and posed the same questions as LB Lambeth’s Lead Conservation and Urban Design and Interim Director of Planning, Doug Black, who ***admitted they have struggled to model the natural rise in height at SICM’s corner site when asked by Planning Inspector Richard Aston at the Examination Hearing on the 6th March 2025 for the revision of Lambeth Council’s SADPD 2022.***

Through our massing (a stepped pizza-like dial) we believe that after consultation and discussion, working with the council and taking onboard inputs our design will ***“integrate well with and complement the scale”*** of the adjoining site to the south of the plot.

This is something that we have designed and massed and shown to Tim Gaymer, whose response was as follows ***“this works, and is what’s needed”***

“We are here now... Higgs yard development is Primacy in the Townscape at Loughborough Junction.” as stated by LB Lambeth’s Lead Conservation and Urban Design, Interim Director of Planning Doug Black. Yet we believe the demands are high, yet the opportunities are higher. (See Page 10)

SA23 has to and will become a sustainable mixed-use town centre development that delivers an improved public realm, wider pavements, integration and regeneration of arches and viaducts, with a perimeter setback building line which will give to this **Junction** a sense of open space, centrality and focal point which will accommodate pedestrian traffic flow (utilizing the long quiet footpath off of Herne Hill Road into the future) in an area that is sliced up by roads and would otherwise become more like Bus Stop P at Brixton Station

This therefore **MUST** be taken into consideration when amending the SADPD, its Design Evidence Papers and during the planning process for SA23. In order to meet its full potential in resolving the the constraints and demands of the public, its needs and Lambeth Council’s too - in doing so, there has to be flexibility with the height, massing and scale of this development, especially if the proposal is not to the detriment of the Heritage (Ruskins Park) nor the station and its future.



SICM's (SA23) Statement & Current Position

SICM's proposal - As stated on Page 9 of this document, LB Lambeth's Lead Conservation and Urban Design and Interim Director of Planning, Doug Black, who *admitted they have struggled to model the natural rise in height at SICM's corner site when asked by Planning Inspector Richard Aston at the Examination Hearing on the 6th March 2025 for the revision of Lambeth Council's SADPD 2022.*

SICMs proposed building (which will be brought forward to the council in the coming months) will rise in massing from East to Northwest and align at West alongside Higgs Yard's 16 storey. Thus creating and completing the open-end massing of Higgs Yard Development and enhancing it. This aligning with the current SADPD's statement on Page 158 *"if well designed to integrate well with, and compliment the scale of, the approved redevelopment of Higgs Yard."* This creating a unified *"landmark building in the New Townscape at Loughborough Junction"* as stated by R.Aston.

Our proposal will continue the urban façade and massing on Herne Hill Road, up to the corner of the site where it meets Coldharbour Lane, our building will then step up in a dialed pizza like manner to rise to the station and to match the 16-storey development (Higgs Yard).

Massing - The aforementioned will be achieved by completing a loop of the East and West block of the Higgs Yard Development both horizontally and vertically which will introduce Urban Greenery at the corner of Herne Hill Road and Coldharbour Lane. The building height at this point will be 8 stories with planting, enhancing and articulating views from from Ruskins Park. This will be 2 storeys less than LB Lambeth's 10 storey massing. It will provide a glazed light weight active frontage on 2 to 3 stories with a link bridge on the first floor back to the station platform as a new feature for safer ingress and egress from the station. As access on street level will always be unsafe because it is located at a choke-point, that being a curve at the underside of the bridge and a series of bridges.

Design – SICM's proposal proposes a ground floor setback and first floor cantilever a much spacious approach with a new station access. The proposal will also link the station at ground, first and possibly second floor allowing for pedestrian traffic and distribution as well as act as a meeting point. This aligns with aforementioned points on page 7 as Doug Black stating that *"There might be some specific schemes which they're happy to identify as part of the allocation."* This referring to TFL, Network Rail, The Arch Company and associated bodies involved in what would be a redevelopment Loughborough Junction Station.

Station Accessibility – The Higgs Yard (Peabody) development does not relate as a focal point to the station or its perimeter urban fabric, approaching the station from the East will focus on providing a new access to the station through SA23 which will help resolve the current problem of a lack of access, in the form of disabled, bicycle storage and other necessary activities that relate to accessibility to the station. The nature of linking bicycle storage and lift to the existing entrance as the core entrance to the station would cause additional problems as stated prior due to its location being a choke point (*refer to massing section on P.10.*) The approach to the prominence of the station should be dictated by SA23's ability to be raised, not only would it act as a visual link, but for all parties involved it would benefit SA23, its demands, the station and more if this was made clear in the new SADPD. The ability for a raised link to the station will be prominent similar to the current graffiti when approaching from the West.

This therefore MUST be taken into consideration when amending the SADPD, its Design Evidence Papers and during the planning process for SA23. In order to meet the constraints and demands of the public, its needs and Lambeth Council's too - in doing so, there has to be flexibility with the height, massing and scale of this development, especially if the proposal is not to the detriment of the Heritage (Ruskins Park) nor the station and its future.



MR15 – Historic England

From: Preece, James [REDACTED]

Sent: 27 October 2025 17:17

To: SADPD

Subject: Lambeth SADPD Main Mods - HE Response

Attachments: 251027 - Lambeth SADPD Main Modifications - HE Response.pdf

Dear Lambeth Policy Team,

Please see attached, HE's response to the Lambeth SADPD Main Modifications consultation. I'd be grateful if you could confirm receipt.

Kind Regards,

James Preece

Historic Environment Planning Advisor

London and South East Region

Mobile: [REDACTED]

Ensuring our heritage lives on and is loved for longer.

historicengland.org.uk

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MR15 - ATTACHMENT

By email: sadpd@lambeth.gov.uk

Our ref: PL00016928

London Borough of Lambeth
Planning Policy and Place Shaping
P.O. Box 80771
London
SW2 9QQ

Telephone: [REDACTED]
Date: 27 October 2025

Dear Lambeth Policy Team,

RE: Lambeth SADPD Main Modifications Consultation

Thank you for consulting Historic England on Lambeth's Site Allocations Development Plan Document Main Modifications. As the Government's advisor on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

Comments

| | |
|---|---|
| MM01 | We support the modification of paragraph 1.16 clarifying that the heights, massing and layout in the design evidence base are indicative and that further testing will be required at the application stage, which helps to address our previous representations. |
| MM02, MM04, MM09, MM11, MM18, MM26, MM33, MM37, MM42, MM44, MM48, MM56, MM63, MM 67, MM74, MM79 | <p>A number of modifications have been proposed concerning the setting of heritage assets. The intent behind these changes appears to be to distinguish between positive elements that merit preservation and other, less significant elements.</p> <p>While we do not object to this principle, the revised wording departs from a well-established and widely understood formulation. In doing so, it alters the meaning in a way that arguably weakens the policy's overall support for heritage protection.</p> |

Specifically, for some policy criteria, the concept of enhancement is now confined to improving only the positive elements within a setting, rather than the setting as a whole. This change removes encouragement to enhance the significance that a heritage asset derives from its setting by, for example, removing negative elements or reinstating views. See step 4 within our [Good Practice Advice on The Setting of Heritage Assets](#).

We would advocate for language that clearly encompasses all elements of a heritage asset's setting. This would ensure that the policy continues to support both the preservation of positive features and the enhancement of those elements of the setting that currently detract from the significance of the asset.

In other instances, the ambition to enhance the setting of a conservation area has been removed entirely, which we do not support. These are:

- MM04 in relation to Albert Embankment Conservation Area, the South Bank Conservation Area and Lower Marsh Conservation Areas.
- MM42 in relation to Brixton Conservation Area.

For those modifications that relate to the Westminster World Heritage Site, we suggest the following wording to focus the policy on sustaining and enhancing the Outstanding Universal Value of the WHS:

- **MM02** *This will address the currently discordant and incomplete urban realm in this part of the Waterloo Opportunity Area, creating a new place of distinct character, which sustains and enhances the Outstanding Universal Value of the Westminster World Heritage Site, including any contribution made by its setting, and the significance of other designated heritage assets.*
- **MM09** *Both developments offer the potential to enhance the Albert Embankment Conservation Area and should sustain and enhance the Outstanding Universal Value of the Westminster World Heritage Site, including any contribution made by its setting.*

| | |
|------------|--|
| | <ul style="list-style-type: none"> • <u>MM11 <i>Development should sustain and enhance the Outstanding Universal Value of the Westminster World Heritage Site., including any contribution made by its setting; and...</i></u> <p>We would be happy to work with Lambeth to resolve the issues raised above.</p> |
| MM05, MM12 | We support these modifications seeking to avoid canyon effects on Lambeth Palace Road. |
| MM22 | We support the modification that includes the OXO Tower in the list of heritage assets for Site 9. Southwark have included the Oxo Tower in their list of Locally Listed Buildings and it is therefore appropriate to identify it within the site allocation for Site 9. |
| MM61 | We support this modification that includes additional references to West Square Conservation Area and Elliots Row Conservation Area located to the North of the Site 7. We note the Walcott CA is also located to the North of the site. We also support the clarification that the Cottington Close Estate is a non-designated heritage asset. |
| MM67 | We support the modifications to the site allocations for Site 22 that seeks to include reference to the setting of Ruskin Park, including views from Ferndene Road and makes clear that development of the site should sustain and enhance the significance of all heritage assets. |
| MM74 | We support this modification that provides further detail on the relevant heritage considerations for the Site 23 and identifies nearby heritage assets such as the Loughborough Park Conservation Area and Ruskin Park, which is a Grade II Registered Park and Garden. |
| MM79 | <p>Whilst this modification usefully clarifies that development should sustain and enhance the significance of all heritage assets, and therefore does not require each asset to be individually listed, it does place particular emphasis on the setting of Camberwell Green Conservation Area and Ruskin Park.</p> <p>However, it is important to note that Camberwell Grove Conservation Area, not Camberwell Green, lies immediately</p> |

adjacent to Site 24 within the London Borough of Southwark. Camberwell Green is located further to the north.

In addition, a number of listed buildings within the Camberwell Grove Conservation Area are situated directly next to the site and could be impacted by the proposed development.

We therefore suggest that the final part of the modified text is further amended as follows:

“... with particular regard to the settings of the **Camberwell Grove Conservation Area and associated listed buildings, the Camberwell Green Conservation Area (Southwark) and Ruskin Park, including views from Ferndene Road.**”

If you have any queries about any of the matters raised below or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

James Preece

Historic Environment Planning Advisor
London and South East Region

Email: [REDACTED]

MR16 – National Grid

From: NG Planning [REDACTED]

Sent: 27 October 2025 19:07

To: SADPD

Subject: Lambeth Site Allocations DPD Main Modifications - NGET Response

Attachments: Lambeth Site Allocations DPD Main Modifications - NGET Response.pdf

Dear Sir / Madam,

Lambeth Site Allocations DPD Main Modifications Consultation September – October 2025

Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.

If you require any further information in respect of this letter, then please contact us.

With Kind regards,

Bradley

MR16 - ATTACHMENT

Our Ref: 105181-024

27 October 2025

Lambeth Borough Council
sadpd@lambeth.gov.uk
via email only

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

t. 01530 412821
fishergerman.co.uk

Dear Sir /Madam,

Lambeth Site Allocations DPD Main Modifications Consultation September – October 2025 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description

Electrical Substation: BENGWORTH ROAD 400kV S/S

Electrical Substation: BENGWORTH ROAD HEAD HOUSE Substation

Cable: NEW CROSS - WIMBLEDON 2 CABLE SECT: 20-42 Cable Route: NEW CROSS - WIMBLEDON 2

Cable: NEW CROSS - WIMBLEDON 1 CABLE SECT: 20-41 Cable Route: NEW CROSS - WIMBLEDON 1

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

New Infrastructure

Demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

ngplanning@fishergerman.co.uk

Fisher German LLP
The Estates Office
Ashby de la Zouch
LE65 2UZ

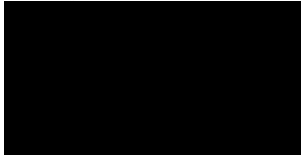
Tiffany Bates, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks MRTPI
Partner**

For and on behalf of Fisher German LLP

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

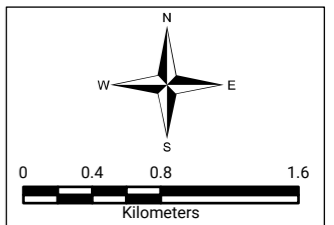
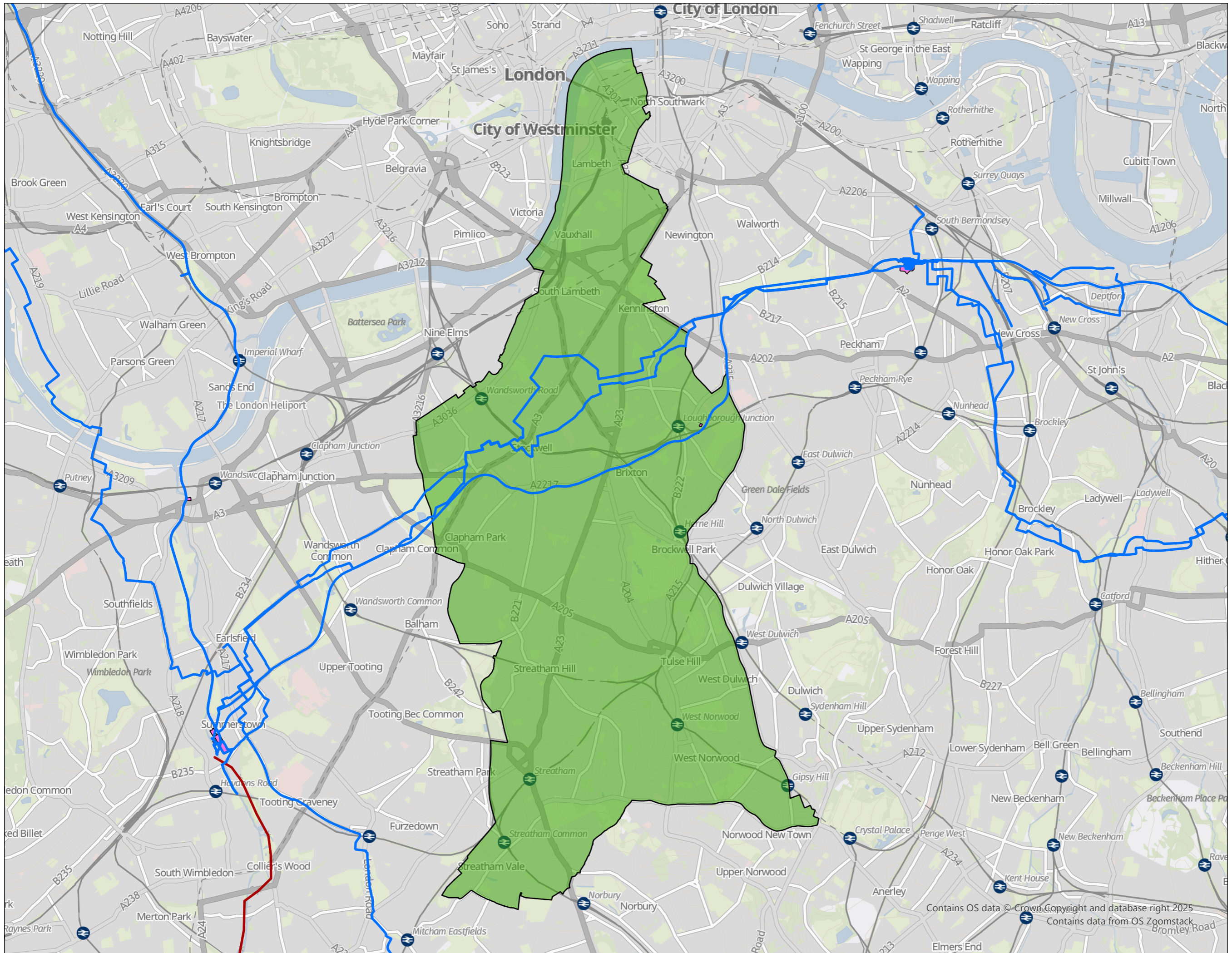
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk



- LEGEND:**
- Cable
 - OHL
 - Substation
 - LPA Area

REVISION: A
 CLIENT: **nationalgrid**
 SCHEME:
 PLANNING INTERACTION
 TITLE:
 LPA ASSET INTERACTION
 FP: 105181-024
 SCALE: 1:44,000 @ A3
 DATE: 20/05/2025

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**fisher
 german**
 The Estates Office, Norman Court
 Ashby de la Zouch,
 Leicestershire, LE65 2UZ
 01530 412821
 fishergerman.co.uk

DRAWING REF:
 NG-2025-03-OT-OP-LPA- Lambeth

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MR17 – Norwood Forum

From: Anne Crane [REDACTED]

Sent: 27 October 2025 23:55

To: SADPD

Cc: Info Norwood Forum; Marian Girdler; Charlotte Ashworth; Sandy Nuttgens

Subject: SADPD

Dear Lambeth

Norwood Forum has been working closely with the Norwood Society, the Norwood Action Group and Station to Station in assessing the impact of the Council's SADPD on West Norwood and in particular the policies for Site 18 (covering the western side of our town centre) and until withdrawn Site 19 (Knolly's Yard). We have jointly attended discussions with Council officers and members and the EIP itself to put forward our collective views.

Norwood Forum is pleased that our sister local groups have responded to the consultation. We fully support the views they have expressed to which we would wish to add the following:

1. It is very disappointing that vast majority of our concerns and those of our sister groups and local residents, businesses and others with an interest in West Norwood which have been raised many times previously still remain unresolved. These relate both to detailed matters and the principle of the policy put forward for Site 18 and thus the very essence of the document. We would ask the Inspector, as part of his assessment of the SADPD, to review the policies as proposed by Lambeth to be modified in the light these previous comments. We respectfully suggest that the document, in so far as it relates to Site 18, is still not sound. Therefore, the policy for a key part of our town centre, and indeed area, should be struck out and instead applications should be determined on the basis of the NPPF, the London Plan and the Lambeth Local Plan. Together these provide an appropriate basis for development and regeneration without the need for the SADPD. Indeed, the SADPD will, in our opinion, undermine the delivery of national, London and Lambeth policy.

2. Lambeth owns all the major development land within Site 18, except the petrol filling station on Norwood Road and the car repairers and car wash at 1 -5 Waylett Place. These latter sites could be developed in isolation, albeit any complications arising from property rights and access would need resolving. In this context Lambeth has control over, and can lead the future development of, Site 18 without the need for the SADPD. Furthermore, the key site, B&Q, has a lease which we understand does not expire until 2034 and a tenant who has clearly stated that they have no intent on moving until then and, if the opportunity arose, beyond that date. In this context any significant redevelopment of Site 18 cannot commence until B&Q moves out of its existing premises. This results in a commencement date of 2034 at the earliest, i.e. in nine years' time. This date is beyond the current Local Plan period and thus the duration of the SADPD. We would urge therefore that a policy framework is put in place closer to the time that B&Q moves, when it is needed and when it would be current. This framework could be a SADPD or a planning brief to inform the owners of the land, primarily Lambeth. It is noteworthy that Lambeth is currently advertising the lease for the site with industrial and church uses to the rear of the petrol filling station and adjacent to B&Q, with access also off York Hill, on a lease to terminate in 2034. There is a landlord's break clause earlier, but the letting details confirm that Lambeth expect B&Q to continue to 2034.

3. Regarding the other properties within Site 18, they comprise two parades of shops with residential or other uses over (324 - 334 Norwood Road and 336 to 346 Norwood Road) and a small area of land to the rear of the Knowles, 294 - 296 Norwood Road. The latter has been the subject of a number of planning applications for its redevelopment. Due to site levels and the aforementioned lease issues, an expectation that this site is developed with the adjoining land is both unrealistic and would delay a beneficial housing or housing lead mixed use scheme.

Station to Station, and their estate agent members, advise that redevelopment of the two parades of shops is not viable. Instead schemes can be brought forward for individual incremental extensions and improvements of the premises to enhance the existing ground floor retail and related offer, as well as for the addition and improvement of residential accommodation above, as has already taken place elsewhere in the town centre and is underway on Site 18 at 344/346 Norwood Road. There is no need for these schemes to wait for the major Lambeth-owned sites to be redeveloped before they can deliver more and better housing and trading space. Furthermore, Lambeth's required set back of any development merely reduces trading space and the likely residential area above to increase the footway width and allow for open storage and tables and chairs. Given a

choice the latter two are of much less commercial value than indoor space. The businesses and others are firmly of the few that the footways are wide enough as they are for the safety and comfort of pedestrians and those visiting the premises. Furthermore, narrower spaces means that potential customers are closer to the shop windows and thus more likely to buy.

4. In summary we would urge you the Council to think again about Site 18 and as a minimum remove the two shopping parades from the designation and the small site behind Knowles if not the entire area. This would promote development and regeneration, as well as the vitality and viability of the town centre. It would also promote the delivery of housing, including much needed affordable homes, in line with national, London and local policy rather than detract from these objectives.

We would also urge the Inspector to so conclude and determine that the SADPD as currently put forward with the main and additional modifications proposed by Lambeth is not sound.

Finally, as we raised during both the consultation period and the hearings, we feel the SADPD process in regards Site 18 has been seriously deficient in its community consultation, and that the council failed to satisfy its commitment to community engagement and consultation set out in the Statement of Community Involvement (SCI) (2020). We would therefore urge the council to seize the opportunity to re-engage with the community, based on the principles of “early, proportionate and effective engagement” and create a sound plan for the redevelopment of Site 18.

Regards Norwood Forum

Online Survey Responses

Please note: a survey response was received from the London Parks and Gardens Trust which only pointed towards their separate email submission – this is MR07 above. A survey response was received from Sureway International Church Ministries which duplicated their separate email submission – this is MR14 above. A separate email submission was received from Mr Stephen Cross, and is included as MR01 above – Mr Cross’ survey response included additional detail and so is included in the table below, alongside two unique survey responses from Frances Greenburgh and Michael Paraskos. Two more survey responses were received, but contained only personal information, with no further comments provided.

Table 1: Survey responses received via GoVocal website

| Representor Number | Representor Name | Modification Number | Comments |
|--------------------|------------------|-------------------------------|--|
| MR01 | Mr Stephen Cross | Heritage & Conservation Sites | The Heritage and Conservation Sites should read “Development should sustain AND PRESERVE [DELETE - "or and enhance"] the Outstanding Universal Value, authenticity and integrity of the Westminster World Heritage Site; and [DELETE - "preserve elements of"] preserve [DELETE - "or enhance"] the setting of the Albert Embankment Conservation Area, the Lambeth Palace Conservation Area, the South Bank Conservation Area and County Hall [DELETE - "that make a positive contribution to these heritage assets.”] These sites cannot be ENHANCED by new development. The word CONSERVE means "to protect (something, especially something of environmental or cultural importance) from harm or destruction". New developments will not achieve this nor will they ENHANCE such areas. |

| Representor Number | Representor Name | Modification Number | Comments |
|---------------------------|-------------------------|----------------------------|--|
| MR18 | Frances Greenburgh | MM10, MM12 | The reduced heights are still too high and will reduce the amount of sky pedestrians will see and will create 'canyon effects' |
| MR18 | Frances Greenburgh | MM15 | 'explore opportunities' is too vague in relation to river access and should read 'create opportunities' |
| MR18 | Frances Greenburgh | MM23, MM24 | Allows too much wriggle room for developers to avoid a new pedestrian route and public space (table continued on next page) |

| Representor Number | Representor Name | Modification Number | Comments |
|--------------------|------------------|--------------------------------------|--|
| MR19 | Michael Paraskos | Building design, views and townscape | <p>The plan rightly recognises the importance of ensuring new developments respect the historic character of Lambeth. However, I believe it should go further in specifying not only the use of appropriately coloured London stock brick, but also the way in which the brick is laid (called its bond).</p> <p>In this part of Lambeth, the traditional and historic pattern for laying bricks is Flemish bond, which gives a textured and visually rich surface that is integral to the local character. By contrast, the widespread use of stretcher bond in new developments often results in sheer, monotonous walls that can feel prison-like, intimidating and entirely out of keeping with the surrounding streetscape.</p> <p>Requiring the use of Flemish Bond would ensure that new buildings harmonise better with the existing townscape, respect the heritage of the area, and contribute positively to the sense of place. This small but significant detail is essential if development is to preserve and enhance Lambeth’s unique and special architectural identity.</p> |

Late Representations

MR20 – Andrew Makower

From: Andrew Makower [REDACTED]
Sent: 01 November 2025 09:12
To: PlanningPolicy; SADPD
Subject: Re: Site Allocations Development Plan Document (SADPD) Main Modifications consultation

Dear Lambeth,

I'm sorry this is late but thank you for the main modifications concerning Ruskin Park. They are correctly assessed as "modest" but they fill a gap in the Plan and improve its soundness. I really hope they will survive into the final SADPD.

Doug Black,

Delivery Lead - Conservation & Urban Design, told the hearing in March that RP is listed/registered because of the eastern (Denmark Hill)

section, the older part, with its structures, landscaping and trees. The Brixton side ("the extension") is "less significant in planning terms". That was why the SADPD takes account of the view of the LJ sites (22 & 23) from the Bandstand but not from Ferndene Rd, and why the view from the top isn't protected by the Lambeth Local Plan.

I pointed out that (i) that's not how listing should work, the whole Park is equally listed and has equal protection and (ii) no-one goes to the Bandstand to look west, they go to the top of the big field.

DB conceded there was "clearly an error with the evidence". He said the view from the top does get considered on specific planning applications, as it was for Hardess Yard, and there is "full understanding" of its importance.

He also conceded it was inconsistent that the SADPD said "Development should preserve or enhance the significance (including setting) of heritage assets. In

particular: Ruskin Park" in respect of site 24 (King's Coll Hosp) but not sites 22 & 23.
See <https://www.lambeth.gov.uk/sites/default/files/2024-03/lambeth-site-allocations-development-plan-document-psv.pdf> p166.

Thank you for listening and responding.

Best wishes from Andrew Makower

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