

The Brixton Society

Understanding the Past, Looking to the Future
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Website: www.brixtonsociety.org.uk

Lambeth Planning,
(Development Management)
PO Box 734,
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Please reply to:
Alan Piper, RIBA,



APiperBrix@aol.com

17th January 2021

For attention of:
Lauren Shallcross,
lshallcross@lambeth.gov.uk

Your ref:
20/04044/FUL

30 ACRE LANE, SW2 – Proposed HMO Conversion to upper part:

Dear Miss Shallcross,

Thank you for your recent letter about the above application.
We must **object** to this proposal in its present form, as detailed below:

1. Loss of Employment Floorspace:

Once again we must object to the loss of employment floorspace from a commercial frontage on the edge of the Brixton Town Centre. It is necessary to safeguard some employment floorspace to support the Brixton Creative Enterprise Zone.

We all know that residential demand around Brixton is strong, so the letters from Haart and Foxtons are hardly necessary. However, the marketing evidence the applicant supplied for prospective business use is not convincing – any serious attempt to let the premises for business use would employ an agent with a higher profile in the commercial sector, such as Kalmars or Randells.

The proposal would conflict with Lambeth Local Plan policies ED2(b) and PN3(m).

2. Residential Amenity:

Privacy and outlook are poor for the proposed 2nd floor rooms, particularly those adjacent to No.32, which are much too close to corresponding dormer windows at 2nd floor level in No.32.

The proposal therefore fails to meet Local Plan policies Q2(ii) and (iii).

3. Large HMO issues:

We are unhappy with any HMO proposal where the number of bed-spaces is in double digits, unless specific criteria are met, as outlined in the final paragraph below.

The applicant's Design & Access statement fails to explain why they have opted to provide an HMO rather than conventional self-contained apartments. An HMO might be acceptable if it met an identified need, such as special needs housing for a charitable organisation, but none such is proposed. No information has been provided about how the premises will be managed, or who residents are likely to be.

A major concern is that the upkeep of common parts and facilities will be inadequate, leading to deteriorating living conditions.

Requirements for a large HMO:

Our minimum expectations for a large House in Multiple Occupation are:

- On-site supervision should be provided, including a dedicated office space located near the entrance. In this case, no information is provided on how the property would be managed in use.
- A cleaner's cupboard and sink should be provided, to enable cleaning of common parts, and storage of cleaning materials and implements.
- Basic laundry facilities should be provided on site, preferably with facilities for drying or airing clothing and bedding. Provision here seems to be very limited, with no drying space.
- No balcony or outdoor amenity space is available for residents in this case. Access is tortuous, via a shared covered yard behind Nos. 32 & 34, and the long internal corridors will require 2nd floor residents to run the length of the building twice to escape in the event of a fire.

The design fails to meet these requirements and Local Plan policies H4, H5, H8 and H9(a), and should therefore be refused.

Yours sincerely,



Secretary.