

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,
Winchester,
SO23 5DG

For attention of:
Maylinne Nasa,
mnasa@lambeth.gov.uk

Please reply to:
Alan Piper, RIBA,



APiperBrix@aol.com

21st July 2021

Your ref:
20/01708/FUL

2-5 STATION AVENUE, Loughborough Junction SW9 – Proposed redevelopment as a large HMO:

Dear Ms Nasa,

Thank you for your recent e-mail alerting us to revised drawings and other documents for the above application.

These have now been reviewed, but the changes do not address our original concerns. The Society's position therefore remains that we **object** to this application, and in particular, the following issues:

Loss of Employment Floorspace:

We accept that the present B8 use is obsolete and not sustainable. However, we are concerned at the complete removal of any employment use from the site. Neither does the development make any positive contribution to the Loughborough Junction "Local Town Centre" within which it sits, for example by providing an "active frontage" at ground level.

The proposal fails to meet Lambeth Local Plan policies ED2, ED6 and PN10.

Types of Residential Development:

The applicant's original Design & Access statement failed to explain why they opted to provide an HMO rather than conventional self-contained apartments. The covering letter from Mialex, dated 30 December 2020, provides little more justification or detail.

An HMO might be acceptable if it met a specific need, such as special needs housing for a charitable organisation, but this application is only for general needs and adult households.

Overall, it would provide sub-standard residential accommodation. The space for kitchen and dining facilities is inadequate for the number of bedspaces, with a shared kitchen/ dining space on only two floors out of three. For the

occupants of 17 bedrooms, the majority of them double, there is only provision for 12 people to dine at the same time. Beyond this, there are no communal lounge areas, merely an open roof terrace which is only usable on dry summer evenings. There is no dedicated laundry or drying space, nor any provision for cleaning communal spaces. It clearly fails to meet Local Plan policies H4, H5, H8 and H9(a).

Traffic Generation:

Bearing in mind the limited on-site cooking facilities, residents will be unduly reliant on home deliveries from local cafes and take-aways. This will generate additional cycle and motorcycle traffic along Station Avenue, to access the revised entrance position. This is not compatible with pedestrian safety along what is meant to be a pedestrianised street.

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. The applicants have grudgingly named a building management firm, but provided no facilities on site.
- Units should be for single people, rather than couples.
- Basic laundry facilities should be provided on site.
- A cleaner's cupboard and sink should be provided, to enable cleaning of common parts.

The design fails to meet these requirements and should therefore be refused.

Yours sincerely,

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

Hon. Secretary