

The Brixton Society

Understanding the Past, Looking to the Future

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For attention of:
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27th March 2019

Your ref:
18/03364/FUL

409-417 COLDHARBOUR LANE, SW9 (“London Hotel”) – HMO Use and External Alterations (both Retrospective and Proposed):

Dear Sir,

Thank you for your letter advising us of the latest application for the above premises. This is a wide-ranging application, but it includes proposals to which we must **object**, in similar terms to our comments in October 2018.

1. Background:

The Society has been concerned about developments at this site over many years. The original planning consent for Hotel use was granted in 1997 (ref. 97/00696/FUL) despite our having pointed out that the plans lacked the usual elements of conventional hotel use, such as function rooms, dining rooms and associated catering facilities. At that time Lambeth was keen to attract a hotel use to Brixton Town Centre so was probably not inclined to look critically at the details.

At the planning appeal hearing in September 2017 (ref.15/00844/3CND) the manager admitted that the premises had not functioned as a hotel, despite this being the approved use.

2. Proposed Use as a House in Multiple Occupation:

The property is clearly far too large in scale to be considered as a House in Multiple Occupation, in the original sense of a large family house occupied by multiple tenants with shared facilities, as distinct from self-contained flats. Such HMOs should typically include a communal dining room, a lounge and some outdoor garden space, but none such are provided here.

HMOs normally originate as houses which may be too large for modern family use. Instead, the original use of this property was non-residential, as a billiard hall with small ground floor shops along the main frontage.

While the building could qualify as an HMO under Section 257 of the Housing Act 2004, if the building were divided into **self-contained flats** meeting

certain criteria, the applicants' proposals run counter to this by further reducing the amenities for residents, such as removing cooking facilities from most rooms.

If the applicants wish to continue a use broadly in line with past operations, the most relevant use would be as a Hostel (Class C1 for short-stay use, C2 if meeting special needs or providing a care element). In that case, Local Plan Policy H9 would apply, but the proposals fail to meet requirements a(i), a(iii) and a(vi) under that policy.

If the applicants wish to revert to the approved use as a Hotel (Class C1), then Local Plan Policy ED12 would apply. In that case, based on the proposed layouts, the premises would clearly fail to meet requirements (a), (b), (c) and (d).

Finally, if the applicants prefer to continue using the premises as long-term residential accommodation, we must **object** because the quality of the accommodation provided is sub-standard. The individual units are well below the sizes set out in the Nationally Described Standards, and they fail to meet the standards of amenity set out in the Mayor's Housing Supplementary Planning Guidance.

We are concerned that there is no mechanism to prevent the continued use of these 38 sub-standard units as permanent housing, so this application should be **refused**.

3. Retrospective Approval of Alterations/ Extensions:

When the extension was proposed in 2008 (ref. 08/01718/FUL) we took the view that the proposed drawings appeared to respect the character of the host building, and so did not make any representations.

However, as constructed, the extension departed substantially from the approved design, including being built both closer and higher in relation to the flats to the rear in Rushcroft Road, as well as the poor quality details which the applicants are belatedly trying to remedy.

It is not clear from the submitted documents which elements of the non-conforming extension and elevations the applicants wish to retain.

We must therefore **object** to any blanket approval, in order to achieve the restoration and improvements proposed elsewhere in the application.

4. Further External Works:

We have examined the different elements and now comment as follows:

External Render: The heavily-textured "Harling" render is a characteristic feature of the original Temperance billiard halls designed by Thomas R. Somerford. We must **object** to the render being painted white, because this would be too harsh a contrast with other surfaces. Colours such as Ivory or Light Grey would be more sympathetic, and better set off the white-painted window frames.

Glazed Tiles: Reinstatement of external tiling is welcome.

Dormers: No objection is seen to the proposed dormer changes. We had previously objected to the use of upvc window frames on the street elevations.

Windows: Reinstatement of stained/ coloured glass is welcome as a characteristic feature of the original design. However this should be backed up by secondary glazing to provide modern standards of thermal and sound insulation.

Shopfronts: There is no objection to reinstatement of the shopfronts, albeit the details only date from 1997/98.

External Grilles: Removal of the external grilles from the Rushcroft Road flank elevation will allow rescue in the event of fire, so must be welcomed.

Cycle Storage: We welcome the provision of dedicated cycle storage within the curtilage.

Refuse Storage: The improvements to refuse and recycling storage are a step forward, but capacity would need to increase if units were after all intended for long-term residential accommodation.

Enclosure: No objection is seen to the proposed design for additional railings on the Rushcroft Road frontage.

In summary, our main concern is the proposed use, which is neither in line with the statutory definition of an HMO, nor the approved use as a Hotel which the Lambeth Local Plan still encourages within Brixton Town Centre. The application should therefore be refused.

Yours faithfully,



Hon. Secretary