

PLANNING, DESIGN AND ACCESS STATEMENT

1. Site:

30 Tradescant Road, London SW8 1XQ

2. Proposed Development:

Conversion of the property into two residential units, with minor external works.

3. Site Description

3.1 The application site comprises an end of a terrace three storey dwellinghouse, located on the north-western corner of Tradescant Road. The roof extension approved in 2017 has been completed.

3.2 The surrounding area is predominantly residential. The site is not located within a Conservation Area and it does not consist of statutory listed buildings.

4. Proposed Development

4.1 The application seeks full planning permission for the conversion of the property into two residential units, including the conversion of the garage into habitable room and new door in the rear elevation providing access to the garden.

4.2 The proposed Flat 1 is located at mostly ground floor level, it would be a 3 bedroom, 4 person dwelling. It would be accessed from the front of the property, via the existing front door. One of the bedrooms for Flat 1 is at first floor level, along with a bathroom – they are accessed by a staircase within the flat. Flat 1 would have direct access to a private rear garden. Refuse storage is shown located at the front of the property. Cycle storage for Flat 1 is accessed via its own garden gate at the rear of the property.

4.3 The proposed Flat 2 is located at first, second and third floor levels. It would be 3 bedroom, 4 person dwelling. Flat 2 would be accessed via the existing front entrance for the building. It would have refuse and cycle storage located to the front of the property.

Room Schedule		
Level	Name	Area

Flat 1 GIA 88.2sqm	Ground Floor	1. Bathroom	3.31 m ²	
	Level 1	1. Bathroom	3.46 m ²	
	Ground Floor	1. Bedroom	10.51 m ²	Single
	Ground Floor	1. Bedroom	10.25 m ²	Single
	Level 1	1. Bedroom	13.72 m ²	Double
	Ground Floor	1. Hall	7.52 m ²	
	Ground Floor	1. Kitchen/Living/Dining	31.26 m ²	
	Ground Floor	1. Storage	1.38 m ²	
Flat 2 GIA 105.3sqm	Level 2	2. Bathroom	3.97 m ²	
	Level 2	2. Bathroom	5.61 m ²	
	Level 2	2. Bedroom	10.59 m ²	Single
	Level 2	2. Bedroom	16.03 m ²	Double
	Loft	2. Bedroom	9.86 m ²	Single
	Ground Floor	2. Entrance Hall	1.46 m ²	
	Level 2	2. Hall	6.74 m ²	
	Loft	2. Hall	2.93 m ²	
	Level 1	2. Kitchen/Living/Dining	27.15 m ²	
	Level 1	2. Storage	2.03 m ²	
	Level 1	2. Toilet	2.18 m ²	
	Level 2	2. Walk-in closet	6.27 m ²	
	Loft	2.Storage	1.67 m ²	

5. Relevant Planning History

17/00146/LDCP - Application Permitted - Decision date: 21.03.2017 Application for a Certificate of Lawful Development (Proposed) with respect to the erection of a rear dormer extension.

23/01903/FUL - Application Refused - Decision date: 15.08.2023 Reasons for Refusal:

1. Insufficient information has been provided to demonstrate that it is not practical to have a ground floor 3 bedroom flat with access to a rear garden, as required by policy H6 of the Lambeth Local Plan 2020-2035 (2021).
2. The proposed development would not provide high quality accommodation, by reason of inadequate amenity space, substandard floorspace and poor access to daylight and sunlight. This is contrary to policies Q2, H5 and H6 of the Lambeth Local Plan 2020-2035 (2021) and policy D6 of the London Plan 2021.
3. Insufficient information has been provided to demonstrate high standard of sustainable design and construction online with policy EN4 of the Lambeth Local Plan 2020-2035 (2021) and S11, S12 and S13 of the London Plan 2021.
4. In the absence of a s106 agreement to secure (i) Car permit free development in case a future CPZ is implemented; (ii) Car Club membership for a period of 3 years for the future residents and (iii) Cycle Hire membership for a period of 3 years for the future residents, the proposed development had the potential to unacceptably impact on the local highway network. The proposal fails to comply with policies T3 and T6 of the Lambeth Local Plan 2020-2035 (2021) and T6 of the London Plan 2021

6.. Planning considerations

6.1 Flat conversion principle

6.1.1 The property as originally built (discounting the roof extensions) is about 146sq.m., which is above the threshold of 130sq.m. in line with policy H6 part A. (This was confirmed in the officer's Delegated Report on 23/01903/FUL.)

6.1.2 The proposed development is assessed against Policy H6 part B in the table below:

Where a dwelling has a floor area (as originally constructed) of at least 130m², conversion of the property into self-contained units may be acceptable provided:	Assessment:
.2 (i) the development provides a high quality of accommodation, and each new self-contained unit meets the standards for new residential accommodation set out in Local Plan policy H5;	The proposed development would provide high quality of accommodation, this is further discussed below in this report
(ii) the proposal provides a mix of unit sizes including the provision, where practicable, of a family-sized home; at ground-floor level with direct access to a rear garden;	Yes, it includes a ground floor family sized unit with direct access to a rear garden
iii. the conversion will not lead to an unacceptable level of noise and disturbance to occupiers and adjoining properties (see Local Plan policy Q2);	Yes, it is considered that the proposal would not result in unacceptable amenity impacts to the neighbouring properties. (This was confirmed in the officer's Delegated Report on 23/01903/FUL.)
iv. the cycle parking and refuse storage arrangements are adequate and do not, by design or form, adversely affect the quality of the street scene (see Local Plan policies Q12 and Q13); cycle parking standards in Local Plan policy T3 will also apply;	Yes, the proposal would provide appropriate cycle and refuse storage areas. This is further discussed in section 6.6 (below).
v. where a Controlled Parking Zone is in place, no additional car parking permits will be issued to any occupiers of additional housing units created through the conversion;	Yes, this is addressed by the S.106 and S.16 Unilateral Undertaking submitted with this application.
vi. where there is no Controlled Parking Zone the occupants of the additional housing units created will not be eligible for car parking permits in the event that a CPZ is introduced at a later date.	N/A

6.1.3 In summary, the proposed flat conversion would comply with policy H6 of the Lambeth Local Plan 2021. (1) Flat 1 is 3 bedroom with access to a rear garden (the size and quality of the rear garden being no worse than that available to the exiting dwelling); (2) amenity space (so far as is feasible given the site constraints) and amenity space consolidated within internal area has been provided ; (3) minimum space standards are met; and (4) the revised layout of Flat 1 addresses previous concerns about levels of daylight and sunlight.

In accordance with Policy H6, the proposal includes a family-sized home at ground-floor level with direct access to a rear garden and which complies with the definition at para 5.39 of the Supporting Text to Policy H6 (i.e. a duplex dwelling with ground-floor access to a rear garden, with three or more bedrooms).

6.2 Housing mix

6.2.1 The proposed housing mix is provided in the table below:

Type of dwelling	No. units	%
One bedroom	0	0
Two bedrooms	0	0
Three or more bedrooms	2	100%

It is noted that the mix includes two units of family sized accommodation.

6.3 Quality of accommodation

Housing standards

6.3.1 Policy D6 of the London 2021 seeks to ensure that developments provide high quality and design housing, and table 3.1 of the policy provides the minimum space standards.

Unit Type	GIA, sq.m.	GIA, sq.m.	Amenity space sq.m.	Amenity space sq.m.
	Proposed	Standard	Proposed	
Lower floors maisonette, two storeys, 3 bedroom, 4 person	88.2	84	10	10
Upper floors maisonette, three storeys, 3 bedroom, 4 person	105.3	90	0	10

6.3.2 The proposed lower flat would meet the minimum internal space standard.

6.3.3 The proposed upper flat would meet the minimum internal space standard.

6.3.4 The lower flat would be provided with private amenity space in accordance with the standards. In assessing the quality of the space, weight must be attached to the fact that the external area currently provides the total external amenity space available for the property, the proposals would not lead to a worsening of the situation. Given the constraints of the site,

it is not possible to provide a larger garden area at ground floor level. There is scope for additional external amenity space to be provided for the lower flat, by providing a roof terrace accessed from the first-floor bedroom directly onto the flat roof; the Applicant would be happy to accept a Condition requiring that provision, or to submit revised drawings (to accommodate such a roof terrace) as part of this application.

6.3.5 The upper flat includes additional internal living space equivalent to the amenity space requirement within a proportion of the dwelling, as per paragraph 5.34 of the policy H5 text.

Also, there is a park within 4 minutes' walk from the property.



Sunlight and daylight

6.3.6 Each of the two bedrooms being created on the ground floor of Flat 1 would have a window facing east. The proposed living room would have windows to the south. The rooms have adequate amounts of daylight and sunlight.

6.3.7 The accommodation at first, second and third floor level, is likely to achieve acceptable levels of light. (This was confirmed in the officer's Delegated Report on 23/01903/FUL.)

6.3.8 It is therefore submitted that the revised internal layouts now proposed address previous concerns about appropriate levels of daylight and sunlight and that the scheme is in accord with policies Q2, H5 and H6 of the Lambeth Local Plan 2021 and policy D6 of the London Plan 2021.

6.4 Design

The proposed development involves very limited external changes to the host building; a new rear door from the kitchen to the garden, removal of the current rear door and replacement with a new window, changes to the boundary wall at the front of the property.

6.5 Amenity

The proposed flat conversion would not give rise to significant disturbance or increase of noise.

6.6 Transport

Accessibility

6.6.1 A 'Public Transport Accessibility Level' (PTAL) assessment has been undertaken for the Site.

PTAL is a measure of the accessibility of a location to the public transport network, considering walk access time and service availability. PTAL is categorised in 6 levels, 1-6 where 6b represents the highest level of accessibility and 1a the lowest level of accessibility.

6.6.2 The PTAL level of the application Site is 6a, which is categorised as 'Excellent'.

Access and Car Parking

6.6.3 There is no existing nor proposed car parking spaces associated with the site.

6.6.4 The site is located within the 'Stockwell S' Controlled Parking Zone (CPZ). Lambeth Local Plan Policy H6 states that 'where a Controlled Parking Zone is in place, no additional car parking permits will be issued to any occupiers of additional housing units created through the conversion'.

6.6.5 It is understood that provision of Car Club membership would be required for all residents from first occupation.

6.6.6 A Unilateral Undertaking under Section 106 of the 1990 Act and Section 16 of the 1974 Act has been included with this application, so as to restrict parking permits and provide Car Club membership in line with the paragraphs above.

Cycle parking

6.6.7 Policy Q13 requires cycle parking to be provided in all development proposals, including conversions.

6.6.8 Cycle parking must be easily accessible, step free, shown on the plans and provided in line with the Lambeth Local Plan policy Q13 and T3, TfL's cycle parking guidance

6.6.9 The application drawings show 4 x long-stay cycle parking spaces, in line with London Plan standards (as advised by the officer's Delegated Report on 23/01903/FUL.)

Cycle Hire Membership

6.6.10 A Unilateral Undertaking under Section 106 of the 1990 Act has been included with this application, so as to minimum of three years free membership of the London Cycle Hire scheme for each flat (as advised by the officer's Delegated Report on 23/01903/FUL.)

Waste and recycling

6.6.11 Policy Q12 states that adequate refuse and recycling storage should be provided for all development and it provides specific criteria in order to protect visual and residential amenity and public health. Further volume and design guidance is provided within the Lambeth Waste & Recycling Storage and Collection Requirements, Technical Specifications (2023) and the Refuse and Recycling Storage Design Guide (2022).

6.6.12 The proposed waste storage is to the front of the property. The application drawings show the separate access arrangements for refuse and cycle storage at the front of the property.

7. The previous Reasons for Refusal

7.1 As detailed in section 6 (above) of this Report, the Council's Reasons 1, 2 and 4 for refusing application 23/01903/FUL have been carefully considered and overcome in this new application.

7.2 With regard to Reason 4, the draft Unilateral Undertaking (under Section 106 of the 1990 Act and Section 16 of the 1974 Act) which forms part of this application provides for:-

- (i) Car permit-free development;
- (ii) Car Club membership for a period of 3 years for the future residents and
- (iii) (iii) Cycle Hire membership for a period of 3 years for the future residents.

7.3 With regard to Reason 3, an Energy and Sustainability Assessment has been submitted with this application.

The assessment demonstrates a high standard of sustainable design and construction in line with policy EN4 of the Lambeth Local Plan 2020-2035 (2021) and SI1, SI2 and SI3 of the London Plan 2021.

Policy EN4: Sustainable design and construction

- A. Lambeth will follow the approach set out in London Plan policies SI1 Improving air quality, SI2 Minimising greenhouse gas emissions..
- B. All development, including construction of the public realm, highways and other physical infrastructure, will be required to meet high standards of sustainable design and construction feasible, relating to the scale, nature and form of the proposal
- C. iii. Minor new-build residential developments of between one and nine units, including proposals that involve extensions or change of use to provide dwellings, must achieve a minimum on-site reduction in regulated carbon emissions of at least 19 per cent beyond Part L of the Building Regulations, unless it can be demonstrated that such provision is not feasible
- D. Proposals should demonstrate in a supporting statement that sustainable design standards are integral to the design, construction and operation of the development. New build residential development are encouraged to use the Home Quality Mark and Passivhaus design standards. Planning applications for non-residential developments should be accompanied by a pre-assessment, demonstrating how the BREEAM standards, or any future replacement standards, will be met.

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

8. CONSTRUCTION

SOUND PROOFING REPORT

The address is an existing property to be converted into two residential dwellings. Flat 1 occupies the ground floor and part of the first floor of the property and Flat 2 occupies the rest of the first floor, the second floor and the loft.

This report proposes improvements to the separating floor between Flat 1 and Flat 2 with an aim to achieve the requirements of Approved Document E 2003.

In order to satisfy the requirements of Approved Document E (ADE) 2003 of the 2000 Building Regulations, the minimum sound insulation performance criteria, as shown in Table 2.1, should be met by all separating floor and wall constructions (i.e. separating elements between different residential dwellings). For this development, the lower requirements for material change of use developments apply.

Element	Design Criteria	
	Airborne	Impact
Floor	$D_{nT,w} + C_{tr} \geq 45$ dB for new build	$L'_{nT,w} \leq 62$ dB for new build
	$D_{nT,w} + C_{tr} \geq 43$ dB for change-of-use	$L'_{nT,w} \leq 64$ dB change-of-use
Wall	$D_{nT,w} + C_{tr} \geq 45$ dB for new build	-
	$D_{nT,w} + C_{tr} \geq 43$ dB for conversions	-

Table 2.1: ADE design criteria for party elements

Based on MOA Architects and Engineers drawing No. MOA/OR/211149/ 04.1, the proposed separating floor system between flat one and flat two is as following:

- 18 mm Chipboard
- 19 mm Knauf Drywall Plank
- 25 mm mineral wool resilient layer of 60 – 100 kg/m³
- 12 mm Existing floorboards
- Existing joists of varying depths
- o 100 mm mineral wool absorption infill of 10 kg/m³
- 2 no. layers of plasterboard of 20 kg/m²

The above construction is comparable to Floor Treatment 2, shown in ADE. ADE gives the following recommendations for the above construction:

- The floating layer should be:
 - o A minimum of two layers of board material
 - o Minimum total mass per unit area 25 kg/m²
 - o Each layer of a minimum thickness 8 mm
 - o Fixed together with joints staggered.
- The floating layer should be laid loose on a resilient layer. The resilient later specification is:
 - o Mineral wool, minimum thickness 25 mm, density 60 to 100 kg/m³
 - o The mineral wool may be paper faced on the underside.
- Ceiling lining should be a minimum 20 kg/m² mass per unit area.

The required minimum mass per unit area of the two board layers (18 mm Chipboard and 19 mm Knauf Drywall Plank) is 25 kg/m². 18 mm Chipboard is expected to have 11.7 kg/m² and 19 mm Knauf Drywall Plank is expected to have 15 kg/m². It should be confirmed by Knauf if the Drywall Plank is suitable for use as a part of a floor construction. An alternative product could be 16 mm Versa panel Cement Particle Board, which also fulfills the minimum mass requirements.

With the above recommendations the construction would be expected to be in line with Floor Treatment 2 of ADE. However, due to the progressively reduced resilience of mineral wool layer above the existing floor boards, the performance of the construction would be expected to lessen over time. In order to ensure the longevity of the construction, resilient bars are proposed below the existing joists.

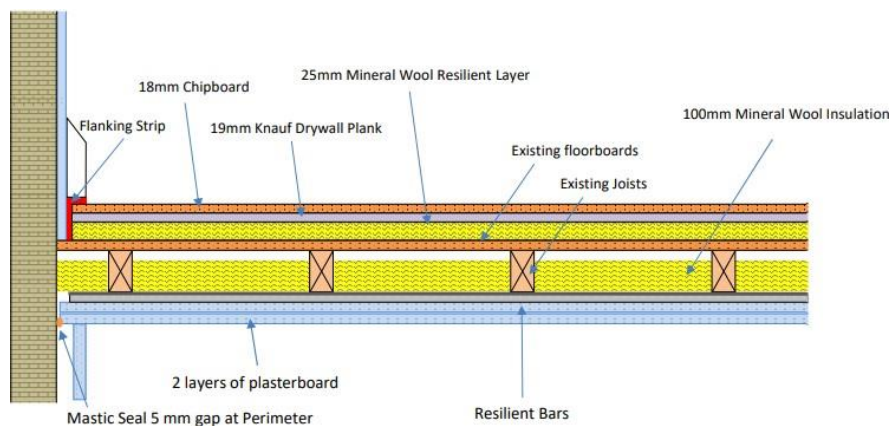
Our full upgraded construction is as follows:

- 18 mm Chipboard
- 19 mm Knauf Drywall Plank
- 25 mm mineral wool resilient layer of 60 – 100 kg/m³
- Flanking strips (such as YELOfon FS) separating all above layers from walls
- 12 mm Existing floor boards
- Existing joists of varying depths
- o 100 mm mineral wool infill of min 10 kg/m³
- 2 no. layers of plasterboard of 20 kg/m² on resilient

bars

- An indicative drawing of the proposed construction is

shown.



The resilient layer and all subsequent hard layers should be fitted so that they are short of the surrounding walls to accommodate the flanking strips. The flanking strip should be folded over at the top so that the skirting boards rest on them and any excess cut away. The gap should then be sealed with a bead of flexible setting mastic.

Similarly, a small (5 mm) gap should be left around the perimeter of the new plasterboard layers below the joists, to be sealed with suitable non-hardening mastic in order to ensure the plasterboard layers are isolated from the surrounding wall.

The screws used to fix the plasterboard to the furring channels should be a suitable length such that they screw through the furring channel but do not screw through to the joists. As two layers of plasterboard is recommended, this will likely mean different length screws will be required for the second layer of plasterboard.

The centres of the furring channels and the clip spacings should be as per the manufacturer's guidance.

Internal walls

Internal walls should achieve a minimum laboratory performance of R_w 40 dB. This can be achieved by the following construction:

- 12.5 mm Plasterboard (min. mass per unit area 10 kg/m^2)
- 75 mm stud (Timber or Steel)
- o 25 mm unfaced mineral wool (min. density 10 kg/m^3)
- 12.5 mm Plasterboard (min. mass per unit area 10 kg/m^2)

Doors

Bedroom doors are required to achieve R_w 29 dB according to ADE. This can be achieved with a door blank with a minimum mass per unit area of 25 kg/m^2 and a full perimeter rubber compression seal (including a threshold seal where possible).

Provided a high quality of workmanship is maintained and gaps between the frame and door blank are minimal, the above is expected to achieve the requirements.

Ducts and pipework

Where pipes and ducts pass through adjacent bedrooms, there is a possibility for flanking noise through the pipe or ductwork itself.

In order to minimise the effects of this, we would recommend following the below advice:

- Where pipework runs through stacked bathrooms, we would recommend first lagging the pipework in mineral wool (25 mm thick, minimum density 25 kg/m³), before boxing in with a double layer of standard plasterboard
- Where pipework will penetrate through bedrooms, we would recommend lagging as above, but boxing in with a double layer of high density plasterboard.

Where pipework penetrates through the separating floor, it should be ensured that there is no rigid contact, but an airtight seal should be achieved using non-hardening mastic. Any fire stopping should also allow for a flexible, rather than rigid contact.

Signed:
Ovidiu Radu

Date:
04/11/2023