

Site address: 7 Amersham Road, London, SE14 6QQ
Our Ref no: 20101 - PLANNING STATEMENT

Proposal: The construction of a three storey extension to the rear of No 7 Amersham Road, SE14, a rear roof extension and a side extension at first and second floor level in connection with the alteration and conversion of the building to provide additional 2 self contained flats together with the provision of bin and bicycle storage areas.

PROPOSED SCHEME

The proposed scheme involves the conversion of the existing property from a single dwelling-house to four affordable flats in the following mix:

FLAT No.	TYPE	GIA (sqm)	No OF PERSON
1	2 Bedroom flat	87.5	4
2	2 Bedroom flat	66.5	3
3	2 Bedroom flat	72.8	3
4	2 Bedroom flat	70.5	3

In order to convert the property to three dwellings and meet the required internal floor standards the following extensions are proposed:

- Basement : excavation to the rear
- Ground floor : rear and side extensions
- First floor : rear extension
- Second floor : rear extension
- Loft level : mansard roof extension

Access to the property will be unchanged.

General improvements will also be made to the elevations of the building.

The proposed scheme will also provide individual private amenity space to the rear of the property by subdividing the existing garden.



PLANNING POLICY CONTEXT

In accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Local Development Plan

For the purposes of the determination of this application, the Development Plan consists of:

- The London Plan 2016
- Lewisham's Core Strategy 2011
- Lewisham's Development Management Local Plan 2014

Consideration has also been given to the relevant adopted supplementary Planning Documents including:

- Residential Development Standards 2012

National Planning Policy Framework

Consideration has also been given to the National Planning Policy Framework (2012) (NPPF), which identifies that there should be a clear presumption in favour of sustainable development, particularly housing and affordable housing development. The NPPF is a material consideration in the determination of planning applications.

Emerging Planning Policy

There are several changes taking place to planning policy across London as a result of the requirements of the NPPF and changes in national level policy.

At a local level, the Council are in the process of replacing their current Development Plan with a new Local Plan. Consultation on the first stage of the process took place in 2015 and there has not been any further consultation since. On the basis that the new Local Plan is in the early stages of development, and the last round of consultation took place 3 years ago, no material weight can be afforded to any emerging aims or objectives of the plan.

At a regional level, the Mayor of London recently concluded consultation on a new draft London Plan. Whilst the draft London Plan has not yet been submitted for examination it is intended to hold the Examination in Public in November 2018 – March 2019 and is a clear guide for the direction of travel for housing development and the ability of small sites to deliver new housing in London. We would argue that some consideration should be given to the emerging policies in the draft London Plan.

SCHEME ASSESSMENT

Principle of conversion to flats

Chapter 6 of the NPPF seeks to deliver a wide choice of high quality homes. Paragraph 49 of the NPPF sets out that housing applications should be considered in the context of the presumption in favour of sustainable development.

Policy 3.8 of the London Plan supports a genuine housing choice for Londoners, “of homes they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments”. London Plan Policy 3.8 goes on to state that new developments should offer a range of housing sizes and types recognising the changing roles or different sectors.

Emerging Policy H1 of the draft London Plan seeks to significantly increase housing supply across London. For Lewisham, this will result in a new housing delivery target of 2,117 per annum. This is a 52% uplift in the Council’s housing targets and therefore the provision of new housing in the borough is very important.

Draft Policy H1 also encourages Boroughs to optimise the potential for housing delivery (own emphasis added), “on all suitable and available brown field sites...especially the following sources of capacity:

- Sites with existing or planned public transport access levels (PTALs) 3 - 6 or which are located within 800m of a tube station, rail station or town centre boundary;
- Small housing sites (see Policy H2 small sites).

Emerging Policy H2 of the draft London Plan demonstrates the future contribution that small sites will make towards the housing targets. The draft policy advises local planning authorities to apply a presumption in favour of the following types of small housing development which provide between 1 and 25 homes (own emphasis added):

- Residential conversions;
- Residential extensions;
- The demolition and redevelopment of existing buildings;
- Infill development within the curtilage of a house.

The property has been identified as being a brownfield site and lies within a PTAL area of 6B which is the best.

Lewisham’s Development Management Policy DM3 sets out the Council’s position in relation to the conversion of properties. The policy states that:

“1. The Council will refuse planning permission for the conversion of a single family house into flats except where environmental conditions mean that the single family house is not suitable for family accommodation due to any factor listed below:

- a. Adjacent to noise generating or other environmentally unfriendly uses*
- b. Lack of external amenity space suitable for family use*

2. *Any single family house considered suitable for conversion according to point 1 of this policy will need to have a net internal floorspace greater than 130 sqm*

3. *All conversions must meet the general design requirements and housing standards in DM Policy 25 (landscaping and trees), DM Policy 29 (Car Parking), DM Policy 30 (urban design and local character), DM Policy 31 (Alterations and extensions to existing buildings including residential extensions) and DM Policy 32 (Housing design, layout and space standards)."*

The aim of this policy as set out in paragraph 2.12 and 2.13 of the Development Management Policies document is to appropriately manage the future subdivision of single family houses and to retain housing choice within the Borough. Paragraph 2.13 is explicit in highlighting that family housing is a valuable resource across the borough and should be retained to meet identified housing needs. This is echoed in paragraph 6.146 of the Council's Core Strategy which protects the loss of family sized accommodation to smaller flatted development through conversion proposals.

The proposed scheme will deliver four units through the conversion of the existing single dwelling which will contribute towards the Borough's overall housing targets, being a benefit of the proposal. The dwelling will be subdivided to create 2 x 3B4P unit, which is recognised as a family sized unit, 1 x 2B3P units and 1 x 2B4P.

The subdivision of the unit will therefore not involve the loss of a family unit to comply with the aim of Policy DM3. Family accommodation is considered to be a priority for the Borough and officers were satisfied during pre-application discussions that, owing to the combined retention of a family sized unit and the provision of new affordable housing, the Council would in this instance be comfortable to work outside Policy DM3.

The proposal will also reinforce the Council's aim of providing housing choice in accordance with London Plan policy 3.8 and chapter 6 of the NPPF. The ability of the site to retain a family sized unit whilst introducing additional 2 bed units demonstrates that the site is suitable for conversion to provide genuine housing choice.

The proposed scheme is also compliant with the direction of travel for the emerging London Plan (policy H2) in recognising the potential of housing conversions. The property lies within an area where flats are present (see no 5 and 11).

The proposed conversion of the dwelling to flats is considered to be acceptable on this basis. The justification given in the policy is to protect family sized accommodation and retain housing choice for the Borough. The proposed scheme has been demonstrated to reinforce housing choice through the retention of a family sized dwelling and provision of three new homes for the borough. The proposal is therefore considered to be entirely in accordance with Policy DM3.

Principle of affordable housing

London Plan Policy 3.11 seeks an overall affordable housing target of 17,000 homes per year in London over the term of the current adopted plan. Priority should also be given to the provision of affordable family sized housing.

Paragraph 2.20 of the Core Strategy sets out that, “*affordability of a home remains an issue through the Borough*”. This has resulted in Core Strategy Objective 3 identifying that the provision of affordable housing is a key priority for the Council. Core Strategy Policy 1 sets out that the Council has a target of delivering 9,082 net additional affordable dwellings between 2010/11 and 2025/26. The policy also highlights the importance of family sized affordable units in line with Core Strategy Objective 3. This is also echoed in Development Management Policy DM 7 which gives priority to family homes within affordable rented schemes.

Page 33 (Section 2.1.5) of the Council’s latest Annual Monitoring Report 2016/17 confirms that of the net housing completions only 20% were affordable. This is below the Core Strategy target of 50% affordable housing in the borough. It is also noted that the shortfall in the previous year was even greater. The proposed scheme will therefore assist in meeting the Council’s affordable housing needs targets.

The proposed scheme will deliver four new affordable rented homes for the Borough, this is seen as an important social benefit of the scheme. The proposals will retain 2x 3 bed family sized home in accordance with Core Strategy Policy 1 and Development Management Policy DM 7. The scheme will also introduce two new affordable units for the borough, both of which will be 2 bed units providing a suitable mix at the property. The units will be rented out at the typical London living rent levels which is recognised by the London Plan as a form of affordable rented tenure.

The scheme, being wholly affordable, will support the overall affordable housing delivery targets of the borough and will support the priority for family sized accommodation. The proposal is therefore considered to provide a significant planning benefit in this respect and is therefore considered to be in line with the relevant planning policies.

Quality of accommodation

The national space standards set out the minimum internal space requirements for new dwellings to ensure that all new dwellings provide a good standard of accommodation, these are consistent with the Mayor’s Housing SPG.

All proposed residential units will meet or exceed the National Space Standards as follows to provide a good standard of accommodation for future occupiers:

FLAT No.	TYPE	GIA (sqm)	NATIONAL SPACE STANDARD (sqm)
1	2B4P	87.5	70
2	2B3P	66.5	61
3	2B3P	72.8	61
4	2B3P	70.5	61

Each unit proposed will have access to private amenity space to the rear of the property. The garden (78sqm) will be shared between flat 2, 3 and 4 (access from the front of the property) The basement flat will have a front and rear garden. The amenity space will be provided in accordance with the Mayor’s Housing SPD requirements.

Impact on residential amenity

Neighbour properties either side of the application site are in use as residential accommodation – no. 5 and 9 Amersham Road.

The windows to the neighbouring properties will retain a good level of outlook, daylight and sunlight in that a 45 degree angle is retained from the nearest windows to meet the relevant requirements. The extensions are sensitively located, do not extend further than the existing side building line and will therefore have no impact on neighbouring amenity.

There are obscured windows proposed to the flank elevation of the application site to prevent any possible overlooking.

Design

Development Management Policy DM31 sets the parameters for alterations and extensions to existing buildings. The policy requires the following criteria are met:

- Side extensions should normally be set back and down from the main building line
- Rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof
- Roof extensions will be resisted on the front roof slope in favour of extensions to the rear of the building
- Roof lights to the front slope should be considered in relation to the design of the dwelling
- Residential extensions, balconies, roof terraces and non-residential extensions adjacent to dwellings should result in no significant loss of privacy and amenity to adjoining houses and their back gardens
- Residential extensions should retain an accessible and usable private garden area, and retain 50% of the garden area
- Extensions should be of high quality design quality

The proposed scheme is considered to comply with the requirements of Development Management Policies DM30 and DM31. The proposal is also considered to be consistent with the Residential Design SPD. The proposed scheme will provide an attractive but consistent approach to the extension of the existing building and seeks to provide a high standard of residential accommodation for future occupants. The proposal is therefore considered to be suitable for this location.

Sustainability

Development Management Policy DM22 seeks to maximise energy efficiency in new developments.

The conversion will take a fabric first approach in improving materials across the site, improved u-values and provide individual gas boilers to each unit to improve carbon savings to the proposed units. The proposed scheme will comply with the relevant part of Part L of the Building Regulations to achieve a reduction in carbon from the development. The proposed scheme is considered to comply with Policy DM22 in this respect.

Parking provision & Refuse storage

Development Management Policy DM29 sets out the Council's requirements for car parking in accordance with Core Strategy Policy 14. The parking standards follow that in the London Plan and given in Appendix 8 of the Development Management document.

The property does not lie in an area subject to controlled parking and currently vehicles can park on street.

Policy DM29 also seeks the provision of cycle parking for residential units. Cycle parking will be provided for each unit within a secure cycle store to the rear of the property in accordance with London Plan Standards set out in Policy 6.9. 4 different shed will be provided at the back of the garden with cedar cladding on lightweight steel frame doors with secure locking mechanisms.

Sufficient bin storage is also provided for each residential unit to the front of the property in a safe and secure location.

This proposal has been guided by relevant policies as outlined in the Development Management Local Plan (DMLP) and will help to meet one of the Core Strategy key objectives, that of providing new homes.

- CSP1 - The scheme consists of four dwellings but includes a mix of three and two bedroom units in keeping with the Policies aim of ensuring a mix of dwelling types and sizes.
- DMPolicy29 – There is no scope for on-site parking, however, the site is within a PTAL rating of 6B (best) and it is envisaged that residents of the proposed dwellings will take advantage of the readily available public transportation and not be reliant on private means of transportation. This will also help reduce pollution and encourage exercise through walking and cycling.
- DMPolicy30 – The proposal responds positively to relevant sections of DMPolicy30, as it relates to retention and refurbishment of existing buildings.
- DMPolicy31 – The scheme is of a sensitive design quality and compliments the character of the existing adjoining building.
- DMPolicy32 – The proposal responds positively to the relevant sections of Policy32, including, privacy, good lighting, security, storage, dual aspect at first floor of extension.