

**SUPPORTING NOTES AND JUSTIFICATION**  
**FOR THE PROPOSED CONVERSION OF THE EXISTING SPLIT LEVEL**  
**2-BED FLAT LOCATED AT FIRST AND SECOND FLOOR LEVELS,**  
**TO 2No. 1-BED / 1-PERSON SELF-CONTAINED RESIDENTIAL UNITS**  
**ONE AT EACH FLOOR LEVEL**

**at**  
**24A ( 1<sup>st</sup> & 2<sup>nd</sup> Floor Levels ) Rushey Green,**  
**Catford, London SE6 4JF**

**Date : 15<sup>th</sup> February 2024**

**Revision : A**

The application site lies in Rushey Green, close to Catford centre and enjoys good public transport links, with a PTAL rating of 4.

The application site currently comprises a split level, located at first and second floor levels, 2-bedroomed flat above a ground floor commercial unit used as dry cleaners.

A planning permission was granted in 2016 for a mansard roof extension above this site and that adjoining premises with two new flats created at the new third floor level.

The Council has previously refused an application, referenced DC/19/111567 dated 15<sup>th</sup> April 2019, for proposals to split the current 2-bedroomed flat into a studio flat at first and a 1-bedroom flat at second floor level.

The proposed separate residential units in the previous application were considered unacceptable in principle with the provision of one person units in an area with PTAL 4. They were also considered not to be of exceptional design quality.

The Council had at the time not raised any objection to the proposed rear elevational changes, but questioned whether the housing types proposed acceptably met the identified housing needs in the area; and, also questioned, whether the living conditions of the future occupiers of the proposed flats would be acceptable, by reason of having inadequate floor spaces, storage facilities and amenity space.

Our current proposal addresses all of the council's concerns and objections and ensures that the new flats are of exceptional design and meet Council's space standards as well as providing comfortable, usable and functional living accommodation and amenity space for the future occupiers.

Space standards, as set out in Table 3.3 of the London Plan of March 2016, depend on the number of occupants for whom a property is designed, and require at least 37 sqm for a 1-bed, 1-person property – our proposal meets this standard.

Notwithstanding the above, the proposal could, however, potentially meet with a different policy objection, found in Policy DM32 of the Lewisham Development Management Local Plan of 2014. That policy states that single person dwellings will not be supported other than in exceptional circumstances.

We consider the current situation does present exceptional circumstances in that the existing flat located at two levels is of sub-standard design giving rise to poor living conditions for the current occupiers.

By way of exceptional circumstances, we would like to draw attention to the poor design of the existing flat, with the access taken through the kitchen resulting in unwarranted fire hazards, and the poor build quality of the existing 2-bedroom flat adversely impacting living conditions for the occupants - the current tenants of the flats located at first and second floor levels are regularly complaining about the noise penetration from the ground floor commercial unit ( dry cleaners ), due to the poorly designed and built timber floors.

The current split level 2-bedroom flat has large rooms and although difficult to prove, is often sublet by tenants causing overcrowding and anti-social behaviour with problems with adjoining owners.

Our proposal will result in one studio flat at first floor level and another at second floor level. We propose to remove the existing floor boards at first floor level, install sound insulation RW3 between the existing timber first floor joists, together with a sound matt on top of the new floor boards - giving rise to improved sound insulation on the first floor and thus resulting in a much improved residential unit. The previous development at third floor level had already provided good sound insulation between the proposed studio flat at second floor level and the existing third floor unit above.

The new residential units shall be fitted with modern mains power supplied fire alarm systems making them safer to live in and safe escape in case of fire. A separate Fire Safety Strategy report has been prepared and issued with this application.

The policy mentioned above also requires that any proposed dwellings must be in highly accessible locations – we consider the application site to be such a location.

Both the proposed flats are designed to be suitable for sole occupation by one person. They are designed to provide good living conditions for the occupier with adequate floor areas, amenity space and inbuilt storage facilities.

Our proposals do not require any alterations to the front elevation or roof. There are some alterations to the rear elevation where the new door and windows shall match the existing. Any new brickwork and brick arches over the openings shall also match the existing.

There is dedicated refuse waste and recycling bins storage at the rear of the property. It is proposed that these bins shall be wheeled to the roadside by the occupants on bin collection days.

The amenity space at the rear first floor level shall be timber boarded decking covered with synthetic grass with metal balustrade around. There will be a motion sensor controlled energy efficient LED light above each main entrance door for safety and security for the occupants.

The application site is within an area with a low probability of flooding (Zone 1).

Small housing sites (less than 10) are exempted from the zero carbon homes target.

Notwithstanding the above, every possible way would be considered during the conversion process as sustainable and energy efficient as possible, both in terms of the materials and process of construction of the proposed development. The new doors and windows shall be fully double glazed matching the existing recently installed double glazed doors and windows and high insulation throughout external walls shall be installed which will result in a highly efficient and insulated envelope.

## **SUMMARY**

We submit that this proposal complies with the development plan for the area. As single person dwellings, the proposal would not be contrary to policy DM32 because, as demonstrated above, exceptional circumstances exist that support the provision of this dwelling type.

The proposed development is therefore considered acceptable in principle with the provision of two single person units in an area with a PTAL rating of 4, helping to meet identified housing need in the area.

The proposed development is also considered to be of an exceptional design quality and the units would provide a good standard of accommodation by way of complying with space standards, whilst also providing built in storage facilities and adequate amenity space.

The proposed development makes very good and optimal use of currently under-utilised, neglected and poorly designed, split level 2-bedroom residential unit which does not fall under the family dwelling category, to create, two much needed, 1-Bed/1-Person, new self-contained residential units that are well designed.

All units are of more than adequate size, exceed the internal space standards set out in the London Plan, provide good amenity space for the occupants and are suitable for occupation – this development will complement and enhance this residential area.

The proposal meets local and national planning policies, positively contributes towards the Borough's housing targets and supports the Council's local policy of making good use of small sites and meets the high quality housing needs of different community groups.

## **PLANNING BALANCE**

A rounded population projection increase of 30% is expected in Rushey Green Ward.

Additional homes over and above the targets in The South East London Strategic Housing Market Assessment ( SHMA ) are required to meet existing and expected increasing demand for new homes in the borough.

There is limited conflict with planning policy but the proposed development would otherwise be in line with the development plan. Adverse impacts of granting planning permission would NOT significantly and demonstrably outweigh the benefits of providing these additional high quality residential units, when assessed against the policies of the NPPF as a whole.

The proposed development is therefore considered to be policy compliant and as such we accordingly and respectfully ask for our planning application to be approved.