

Table of Comments received and Council Responses
Draft Guidance and Standards for Housing Development and House Conversions SPD (July 2008)

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
1	Peter Quails	Questionnaire	-	-	-
2	Anatol Lopato	Questionnaire	-	-	-
3	David Cieplinski	Questionnaire	-	-	-
4	Niko Airikkala	Questionnaire	-	-	-
5	Guy Manners- Spencer, Residential Land	Questionnaire	-	-	-
6	Tim Riley	Questionnaire	-	-	-
7	David Caddick, The Light Corporation	Questionnaire	-	-	-
8	Alex McLeod, Macaulay Enterprises	Questionnaire	-	-	-
9	Matthew Connor, Capitasilk Ltd	Questionnaire	-	-	-
10	Adam Lukasz	Questionnaire	-	-	-
11	Miroslaw Kuliniec	Questionnaire	-	-	-
12	Panec Rutecki	Questionnaire	-	-	-
13	Norbert Rutecki	Questionnaire	-	-	-
14	Cezowy Rutecki	Questionnaire	-	-	-
15	Jan Dombrowski	Questionnaire	-	-	-
16	Jones Lang Lasalle	Questionnaire	-	-	-
17	Krzysztof Malachwiew	Questionnaire	-	-	-

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18	Piotr Baczynski	Questionnaire	-	-	-
19	Marcin Benedyczuk	Questionnaire	-	-	-
20	David Wing	Questionnaire	-	-	-
21	Anna Job	Questionnaire	-	-	-
22	David Huxley	Questionnaire	-	-	-
23	Caroline Allen	Questionnaire	-	-	-
24	David Holden	Questionnaire	-	-	-
25	Alexandra Urminska	Questionnaire	-	-	-
26	Kirsty Huxley	Questionnaire	-	-	-
27	Sara Burr, Kenneth Burr Associates	Questionnaire	-	-	-
28	Christopher Allen	Questionnaire	-	-	-
29	Patricia Huxley	Questionnaire	-	-	-
30	Brian Gibbs, Davis & Gibbs	Questionnaire	-	-	-
31	Ian Dage	Questionnaire	-	-	-
32	Mark Wilson	Questionnaire	-	-	-
33	Piers Bingley, Haywoods Group	Questionnaire	-	-	-
34	Nick Laurence	Questionnaire	-	-	-
		SPD is introducing new policy	General	The SPD is not introducing new policy. Its purpose is to elaborate and give more guidance to the policies contained in the UDP.	No change
35	Piotr Nowak, J&P Nowak	Questionnaire	-	-	-
36	Jana Bartschova, Haywoods	Questionnaire	-	-	-

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	Group				
37	Eric Sames, ESAPS Ltd	Questionnaire			
		Unhappy that the Council is 'dictating' how much space a person requires and believes that this will affect first time buyers.	Section 1	<p>The use of space standards is by Local Planning Authorities is long and well established and used by many other London boroughs. In addition significantly, space standards have recently been prepared by English Partnerships for use by the Housing Corporation. The Mayor is also preparing asset of standards to accompany his Housing Strategy for London.</p> <p>A study into housing space standards commissioned by the GLA and undertaken by HATC (published in 2006) concluded that space standards would not likely have a substantial impact on housing supply, property values, or, therefore, on affordability.</p> <p>See Annexe to Appendix 1 (2)</p>	No change
38	Claire Ashton-Johnson	Questionnaire	-	-	-
39	Tom Haxworth, Tangent Projects Ltd	Questionnaire	-	-	-
40	Richard Tummons	Questionnaire	-	-	-
41	Darren Firth	Questionnaire	-	-	-
42	Tom Perring	Questionnaire			
		Believes that the housing guidance will impose limits on what can and cannot be developed. Also feels that this will have a 'significant impact' on the type and style of housing that will be available in the area.	General	The Council is trying to ensure that only good quality conversions are carried out in the Borough. The impact will be to prevent sub standard flats being created and to ensure that the type of accommodation being provided ensures a good standard of living for its occupants. Policy 17 of the accompanying UDP aims to protect the supply of	No change

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				small family housing accommodation in the Borough by preventing conversion of house below 120 square metres in size.	
43	Reiss Woodward	Questionnaire	-	-	-
44	Ronke Maye	Questionnaire	-	-	-
45	Katja Mills	Questionnaire	-	-	-
46	David Eaton	Questionnaire	-	-	-
47	Nigel McVittie	Questionnaire	-	-	-
48	Unable to determine name, Haywoods Group	Questionnaire	-	-	-
49	Razor Investments Limited	Questionnaire	-	-	-
50	Minostaw Timoszuk	Questionnaire	-	-	-
51	James Fawcett	Questionnaire	-	-	-
52	Gail Horridge	Questionnaire	-	-	-
53	Calvin Reeves, John Strand (MK) Ltd	Questionnaire	-	-	-
54	Krystian Fiedorow	Questionnaire	-	-	-
55	Darivsz Marzec	Questionnaire	-	-	-
56	Luleasz Fiedorow	Questionnaire	-	-	-
57	Yacek Blaszkowski	Questionnaire	-	-	-
58	Robert Bielat	Questionnaire	-	-	-
59	Antoni Onoszko	Questionnaire	-	-	-
60	Sebastian Fiedorow	Questionnaire	-	-	-
61	Grzegorz	Questionnaire	-	-	-

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
	Skalimowski				
62	Dariusz Bialek	Questionnaire	-	-	-
63	Carl Brittain	Questionnaire	-	-	-
64	Iain Boulton	Questionnaire	-	-	-
65	Russ Curlew Ltd	Questionnaire	-	-	-
66	Tim de Vere Green, Fresh London	Disagree with minimum overall floor areas. The increased room sizes together with room shapes (para. 1.8) will remove the problem of poor overall quality.	Page 3 Para. 1.11	See Annexe to Appendix 1 (2) The minimum room dimensions are being deleted.	Remove para. 1.8 relating to minimum room dimensions.
		Disagree with increases to minimum room sizes.	Page 3 Para. 1.12	The floorspace standards for flats and rooms set out in the SPD are consistent with the standards being applied by other London boroughs and the standards proposed in the Housing Space Standards report prepared for the GLA (HATC report on Housing Space Standards August 2006), as well as that recently drawn up by English Partnerships. See Annexe to Appendix 1 (2)	No change
		The minimum floor areas combined with policies at paragraphs 5.13 and 5.14 could restrict subdivision of houses which are suitable for conversion to flats.	Page 11 Paras. 5.13 and 5.14	Some houses may not be suitable for conversion to flats of adequate quality. A balance needs to be achieved between retention of family homes and allowing some homes to be converted to flats.	No change
		Extensions do not result in over-intensification.	Page 11 Para. 5.9	Large extensions can be used to try and create inadequate sized extra units, resulting in over-intensification, as defined at Policy 17(b) of the Adopted UDP and at paragraph 5.9 of the Draft SPD.	No change
		The definition of over-intensification is unclear and does not provide sufficient guidance to developers.	Page 11 Para. 5.13	Over-intensification is defined at Policy 17(b) of the Adopted UDP and at paragraph 5.9 of the Draft SPD.	No change
		There is conflict between paragraph 5.14 and paragraphs 5.9 and 5.13. A mix of units, family unit on the ground floor would not be possible	Page 11 Para. 5.14	The purpose of Policy 17 of the adopted UDP and the accompanying SPD guidance is to try and prevent conversions of smaller houses but not to stop houses that have already been extended and exceeding 120	No change

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		without extensions.		sq m as originally constructed from being converted.	
		The guidelines on handing and stacking are not required as current sound insulation requirements provide adequate protection.	Page 11 Para. 5.15	Handing and stacking are design and layout features, which provide added protection against noise for occupiers and are a sensible approach to dealing with this issue, as noise is a particularly sensitive issue in the conversion of existing properties that were not purpose built as flats. This also relates to UDP Policy 17 (d) which addresses the quality of conversions; part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
		Compliance with Part E of the Building Regulations provides adequate soundproofing. This is a matter for building control.	Page 12 Paras. 5.17 and 5.18	Handing and stacking are design and layout features which provide added protection against noise for occupiers. They also relate to UDP Policy 17 (d) which addresses the quality of conversions, part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
		In some cases a separate front door on some corner sites is appropriate.	Page 12 Para. 5.19	The Council considers that in most cases access to flats within converted buildings should be provided through the original front entrance; however the wording of paragraph 5.19 does provide scope for alternative proposals to be considered.	No change
		Minimum floor areas are unnecessary and could prevent or restrict house conversions.	Page 13 Para. 5.22	See Annexe to Appendix 1 (2)	No change
		It is unclear how this policy fits with the transport department's existing policy. A development should not be permit-free because it is in a high PTAL score area.	Page 13 Para. 5.24	Complies with Adopted UDP Policy 14. The guidelines "encourage" car-free schemes in high PTAL areas and in such cases will be "permit-free" if the area is also in a CPZ.	No change
67	Richard Woollard, Woollard Smith & Associates Ltd	All standards should be flexible and recommendations only. Disagrees with minimum room sizes.	General	See Annexe to Appendix 1 (2)	No change
		Disagrees with minimum ceiling height of 2.3m.	Page 3 Para. 1.9	A minimum ceiling height is necessary to maintain decent living standards.	No change

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68	Nigel Broome	The SPD will prevent conversions at a time of a housing crisis.	General	The SPD seeks a balanced approach, retaining family housing whilst providing flats designed to high standards through conversions. Overall the Council is already well set to meet its 10 year target in the Mayor's London Plan.	No change
		Stacking and sound proofing are issues for Building Control.	Page 11 Para 5.15	Handing and stacking are design and layout features which provide added protection against noise for occupiers and are a sensible approach to dealing with this issue as noise is a particularly sensitive issue in the conversion of existing properties that were not purpose built as flats. This also relates to UDP Policy 17 (d) which addresses the quality of conversions; part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
69	Nabil Mezoughi Community Safety Team	There should be reference to crime prevention as house conversions are a major burglary generator.	General	The Council is also producing a Safer Building Environments SPD which will address all relevant crime prevention issues.	No change
70	Roland Rattray	There should be reference to crime prevention as house conversions are a major burglary generator.	General	The Council is also producing a Safer Building Environments SPD which will address all relevant crime prevention issues.	No change
71	CgMS on behalf of Metropolitan Police	References to policy numbers in the SPD should be changed to reflect the new policy numbers in the Adopted UDP.	General	Accept.	Update policy references to reflect those in the Adopted UDP.
		Recommend a short section on secure housing developments and community safety, stating that all developments should minimise opportunities for crime by adhering to Secured by Design principles and liaison with the Metropolitan Police Service's Local Crime Prevention Officer.	General	These issues are addressed in the Council's SPD on Safer Built Environments.	No change

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72	Bellway Homes	The SPD lacks information on overall floor area set according to the number of bedrooms AND the number of proposed occupiers.	Page 3 Figure 1	Minimum floor areas are set as a safety net feature. In addition, minimum room sizes are set according to use. In designing new schemes, a combination of these will serve well in providing adequate room sizes and floor areas.	No change
		Setting minimum widths and lengths of living rooms and bedrooms could lead to a lack of innovation.	Page 2 Para 1.8	Accept.	Remove para. 1.8.
		Further clarification is required for one bed one person accommodation.	Page 3 Figure 2	Accept. One bedroom flats should provide for two bedspaces.	Add a new sentence at paragraph 1.11, page 3, stating: "One bed one person units are only acceptable in new build schemes, not conversions."
		Amenity space for flats – the additional 10 sq m per flat – can it be added to the communal area or be provided in the form of small garden/terrace.	Page 5 Para. 2.8	Accept need for clarification.	Replace sentence at para. 2.8 with, "For new flatted developments, shared amenity space of at least 50 sq m per scheme should be provided. A further 10 sq m per flat should also be provided, either as a balcony/terrace/private garden or consolidated with the communal space."
73	RPS for Haywoods Group, James Laurence Group and Razor Investments	Does the draft SPD accord with Planning Policy Statement 12, paras. 2.43 (i), 2.44 and 4.40? The SPD is overly restrictive and does not accord with the London Plan or the UDP.	General	The SPD is consistent with national, regional and local planning policies as set out at para. 2.43 (i) of PPS12. All aspects of the SPD comply with UDP policies, which in turn has been through a Public Inquiry. The resulting recommendations set out by the UDP Inspector have been taken on board. Also see Annexe to Appendix 1 (1) and (2)	No change
		The SPD will affect the ability of LB Lambeth to meet its housing	General	See Annexe to Appendix 1 (1) and (2)	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		provision targets.			
		Studio accommodation if provided to a good standard can provide a valuable source of accommodation.	Page 11 Para 5.15	Accept See Annexe to Appendix 1 (1)	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		The setting of overall floor areas and room sizes conflicts with local, regional and national guidance. Current room standards are adequate.	Page 3 Paras 1.11-1.12	See Annexe to Appendix 1 (2)	No change
		Stacking and noise insulation consideration are inappropriate.	Page 11 Para 5.15	Handing and stacking are design and layout features which provide added protection against noise for occupiers and are a sensible approach to dealing with this issue, as noise is a particularly sensitive issue in the conversion of existing properties that were not purpose built as flats. This also relates to UDP Policy 17 (d) which addresses the quality of conversions; part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
		Sensible to include storage areas in conversions where appropriate.	Page 3 Para 1.10	Noted.	No change
		Car parking - Permit free development should only be considered in areas where there is a high level of stress and where any further on-street parking would be detrimental to highway safety.	Page 13 Para 5.24	This aspect of the SPD complies with UDP Policy 17 (e) which states that in areas of high parking stress, where two or more converted units are proposed, Policy 14 (e) will apply. Policy 14 (e) states, "On-Street Parking - Parking for new development may be accommodated on-street, providing this does not interfere with bus use; sufficient carriageway width remains for all road users; and it would not have an unacceptable impact on road safety, emergency service access, amenity or traffic management."	No change
		Requiring permit-free development in areas where there is available on-street parking does not accord with Circular 2005/05.	Page 13 Para. 5.24	Para. 5.24 'encourages' car-free development in areas with high public transport accessibility. The Council does not require permit free development in other parts of the Borough where public transport is	No change

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				less good and on street parking is permitted. The control of car parking is directly linked to the impact of a development and is therefore in accordance with the tests of lawfulness in Circular 2005/05 on Planning Obligations	
74	Peter Pendleton & Associates Ltd	Studio flats should be acceptable in conversions.	Page 3 Para. 1.11	Accept See Annexe to Appendix 1 (1)	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		For new build, the minimum floor area set for studios of 37 sq m significantly exceeds that set by other London boroughs.	Page 3 Figure 1	For new build schemes, a minimum floor area of 37 sq m for a 1 bed 1 person flat is considered to be an appropriate minimum. This figure is similar to that used by other London Boroughs and the GLA study on Housing Space Standards (August 2006). Also see Annexe to Appendix 1 (2)	No change
		There should be a standard for a combined living/kitchen/dining room.	Page 3 Figure 2	The Council does not feel it necessary to include such a standard.	No change
		The requirement to provide details of overall floorspace and room sizes is unreasonable.	Page 4 Para. 1.12	According to the GLA study on Housing Space Standards (August 2006) over two thirds of London Boroughs have set space standards. Therefore this is not unusual. In Lambeth, there is a requirement to provide details of room sizes. Extending this to include overall floor areas is not unreasonable and should in any case be part of the design stage of a development.	No change
		Para. 16 of PPS3 does not require provision of amenity space, it states amenity space to be one of the design criteria for new housing.	Page 5 Para. 2.2	Although not a requirement in PPS3, the provision of amenity space is nevertheless an important design consideration. This has been carried through into the SPD for new development but does not apply to conversions.	Amend para. 2.2 to: “For family housing, PPS3 advises provision of recreational areas, private gardens, play areas and informal play space.”
		The requirement to provide amenity space in all residential development	Page 5 Para. 2.4	This aspect of the SPD complies with UDP Policy 50 part (c), which supports provision of open space	At page 5, para. 2.6, replace first sentence with, “Sufficient

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		is unreasonable.		particularly where development adds to the demand for open space.	outdoor amenity space should be provided in new residential developments, where appropriate and particularly in areas of open space deficiency. It can be provided in the form of"
		Commuted payments in lieu would not accord with the policy tests of Circular 05/2005.	Page 5 Para. 2.6	This aspect of the SPD complies with UDP Policy 50 part (c), which states, "Where on-site provision or provision in the immediate area is impractical or insufficient, developers will be required to contribute to such initiatives elsewhere." This is entirely consistent with Circular 2005/05 and approach to pooling.	No change
		SPD should refer to provision of patios and balconies.	addition	Accept.	Replace sentence at para. 2.8 with, "For new flatted developments, shared amenity space of at least 50 sq m per scheme should be provided. A further 10 sq m per flat should be provided, either as a balcony/terrace/private garden or consolidated with the communal space."
		A landscape, management and maintenance plan should not form part of a S106.	Page 6 Paras. 2.11	The Council believes that this is the most effective way to secure such benefits	No change
		S106 Agreements should not control the management and maintenance of private land as it does not accord with Circular 05/2005.	Page 6 Para. 2.15	However a S106 will be needed to secure off-site provision and upkeep.	No change
		Should refer to 'dwellings' not 'properties'.	Page 10 Para. 5.6	Accept.	At para. 5.6, replace "properties" with "dwellings".
		The SPD should make clear that it	Page 10	The SPD does not apply to dwellings that have	No change

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		does not preclude the rearrangement of dwellings that have already been converted.	Para. 5.6	already been converted. In any case, the internal rearrangement of rooms would not necessarily be the subject of planning control.	
		Should refer to 'dwellings' not 'property'.	Page 10 Para. 5.7	Accept.	At Para. 5.7, page 10, replace "properties" with "dwellings".
		Should accord with UDP Policy 17 (c) which says, "Conversions should include a full mix of unit sizes wherever this is practical ..." Studio flats can be acceptable in appropriate locations and the SPG as drafted could lead to accommodation being wasted.	Page 11 Para. 5.14	Accept. Also see Annexe to Appendix 1 (1)	At para 5.14, page 11, end of second sentence add: "...wherever this is practical. Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
75	Cllr Andrew Gibson	Documents are too voluminous and not reader friendly. Much of the report's content is "flannel and padding."	General	Noted. However the SPD provides guidance on a wide range of issues and will be used frequently by a large number of organisations and individuals. Its content is clearly structured and it attempts to be as clear and understandable as possible to a wide range of users.	No change
		The Council should not be converting homes where sports, leisure and community facilities are sparse.	General	Homes are allowed for conversion where planning applications comply with planning considerations and policies in the UDP.	No change
		The negative impact of conversions such as more cars, more dustbins, concreted gardens etc should be a factor against allowing more conversions.	General	Homes are allowed for conversion where planning applications comply with planning considerations and policies in the UDP.	No change
76	Cllr Clare Wheelan	The SPD should ensure people make the environmental sustainability of their development/conversion a priority.	Addition	Environment and sustainability issues will be addressed in the Sustainable Design and Construction SPD which is being prepared by the Council.	No change
77	Cllr Jackie Meldrum	SPD should require separate letter boxes and door bells for each flat.	Addition	There are no requirements or controls insisting that this occurs, however, a reference to this to encourage good practice has been inserted in the	A new section on good practice has been inserted into the SPD. Within this

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				SPD.	insert the sentence: “Clearly numbering and identifying flats and houses, together with separately labelled letter boxes is sound good practice and the Council actively encourages this.”
		Refuse bins need unstepped access to the pavement.	Page 13 Para. 5.26	This will be addressed in the paragraph.	At the end of para 5.26 add: “Wherever possible the front of the property should have easy, unstepped access to the pavement to ensure that bins are stored off the pavement. “
		Sound insulation for horizontal and vertical neighbours.	Page 12 Para. 5.16	This is beyond the control of planning legislation and is a building control matter. However, a reference promoting this subject will be inserted in the Good Practice section encouraging the implementation of higher standards.	A new section on good practice has been inserted into the SPD. Within this insert: “In all conversions the Council will seek higher noise insulation standards than those set out in the Building Regulations to try and minimise noise disturbance.”
		Promote party wall agreements in terraces.	addition	Party wall agreements are covered by other legislation and are not within planning powers. This is a matter for Building Control.	No change
		What is a minimum ‘kitchen’? How much space should be required for appliances and cupboards?	Page 3 para. 1.12 figure 2	The SPD states that a kitchen’s minimum size is 6 sq metres (8 sq metres for larger accommodation). This is intended to take account of storage space.	No change
		Encourage shared facility of combined heating boilers.	Addition	The use of renewables is dealt with in Policy 34 (Renewable Energy) of the Adopted UDP and will be addressed in the SPD on Sustainable Design and	No change

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				Construction in its consideration of larger new build developments.	
		Meter boxes are an eyesore.	Page 12 para 5.20	For conversions, this is addressed at para 5.20, page 12 of the draft SPD. The Council can not control such matters but can encourage good sense and practice by the utilities companies to reduce the visual impact.	A new section on good practice has been inserted into the SPD. Within this insert: “The Council will encourage utility companies to site new meter boxes in places which are inconspicuous to reduce their visual impact.”
		SPD should require provision of secure bike storage in front gardens.	Page 13 para 5.23	The requirement for cycle storage is addressed at para 5.23, page 13 of the draft SPD. But the location for parking is not prescribed. The provision of cycle sheds in front gardens would not be supported as they are usually quite large and visually intrusive.	No change
		Clarify access to gardens in converted houses.	Page 13 para. 5.27	Policy 17 requires the ground floor flat to be for family use with access to a garden where there is one. This will be clarified at para 5.27 of the draft SPD.	At end of para 5.27, add: “Any ground floor family units which are provided should have direct access to the garden.”
		Parking in converted houses – should be limited to one car per converted house for a CPZ.	Page 13 para 5.24	This would be too prescriptive as the size of conversions often varies. Parking standards are set out in Table 6 of the Adopted UDP and we have to comply with this. Parking standards have to be set out under Government national policy as maximum standards.	No change
		There should be a dedicated section on family housing in the SPD, requiring: - use of high quality materials	General	Materials – the look and design of materials is a planning matter but not the use of ‘high quality’ materials. This is beyond the scope of planning control.	No change
		There should be a dedicated section on family housing in the SPD, requiring: - extra storage space for toys and	General	This is beyond the scope of planning control. However the space standards which are included in the SPD attempt to take account of storage needs of occupants.	No change

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		play equipment			
		There should be a dedicated section on family housing in the SPD, requiring: - secure cycle storage	General	Cycle parking is addressed at para 5.23, page 13.	No change
		There should be a dedicated section on family housing in the SPD, requiring: - access for buggies	General	The storage of pushchairs is addressed at para 1.10, page 3.	No change
		There should be a dedicated section on family housing in the SPD, requiring: - sound insulation	General	Sound insulation - for conversions, this is addressed in the section headed 'noise insulation' at para 5.16, page 12.	No change
		There should be a dedicated section on family housing in the SPD, requiring: - a mix of family size properties	General	This is addressed in UDP Policy 17 Flat Conversions, part (c).	No change
		There should be a dedicated section on family housing in the SPD, requiring: - play facilities for different age groups	General	The SPD refers to provision of play facilities at para. 2.12.	No change
		Are interior doors high enough?	addition	This is beyond the scope of planning control.	No change
		Air conditioning units in flats can look untidy.	Page 12 addition under External Appearance	The installation of the external ventilation system for air conditioning units require planning permission as flats do not have permitted development rights. The external appearance of flats would therefore be addressed through this process.	No change
		Why doesn't the SPD meet the Code for Sustainable Homes?	addition	The Code for Sustainable Homes is not yet mandatory. The SPD must reflect and give further guidance on the provisions of the UDP. As the UDP does not take account of the Code (the UDP was substantially written before the Code was published) it is not possible to introduce the Code into the SPD at this stage. However, the forthcoming Sustainable	No change

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				Design and Construction SPD will deal with this matter.	
		Encourage on-street surveillance.	addition	Policy 32 of the Adopted UDP (Community Safety/Designing Out Crime) sets out the basis of the Council's 'Secured by Design' approach which puts strong emphasis on surveillance and 'eyes on the street' The SPD on Personal Safety and Security will give further guidance on this.	No change
		Will the requirement for play facilities in developments generating 10+ children result in fewer family units?	Page 6 Para 2.12	It is not anticipated that this will be the case. The SPD states that play facilities will be sought for developments of 10 units or more but where this is not feasible contributions to provision nearby will be acceptable. This requirement reflects the recent draft GLA Supplementary Planning Guidance on Providing for Children and Young People's Play which, once approved, will be a material consideration in the determination of planning applications of a strategic nature throughout London.	No change
78	Katharine O'Donovan	Questionnaire			
		Enforcement is a huge problem with developers who convert dwellings to standards which do not accord with Lambeth guidelines.	General	Noted. The Council endeavours to use its enforcement powers in any instances where planning controls are contravened.	No change
		A family unit should consist of a 3 bed unit, not a 2 bed unit.	Page 11 Para. 5.14	The present 2 bed definition of a family unit in the SPD must comply with the definition in the UDP. Policy 17 describes a family unit as a 2 bed unit.	No change
79	Arlene Weller	Questionnaire			
		Privacy and spacing distances between buildings should be clearly defined.	Page 8	In London, in particular, the distance between buildings is dependent on the existing character of streets. However guidance is set out in the Department for Transport's Manual for Streets (March 2007) which does not set fixed rules but highlights important design considerations and the SPD is considered to be acceptable in this respect.	No change

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		Amenity space and play space provision should apply to conversions not just new developments.		This is not feasible when working with the conversion of an existing dwelling where amenity/play space already exists .	No change
80	Kay Trotter	Questionnaire			
		Need to look at the number of conversions in an area as they may change the character of the area and create parking problems.		The approach of judging the cumulative impact of conversions on a street or in an area is not part of UDP Policy and therefore cannot be introduced through an SPD.	No change
81	Steven Wiltshire	Questionnaire			
		Need restrictions to prevent loss of basement to conversions.	General	The guidance in Policy 17(c) is considered to be satisfactory. It states, "Basement excavations, the subdivision of existing flats and of floors between flat units will be permitted only where the size and layout of units is satisfactory, and units have satisfactory light. No units should have a solely north facing aspect or include wholly internal kitchens or kitchen areas."	No change
82	Hazel Fraser	Questionnaire			
		The section on over-intensification needs strengthening	Page 11 Para. 5.12	In accordance with government guidelines, all SPDs must be in line with UDP policies. It is not possible to introduce new policy through SPDs, for this reason the section on over-intensification must be in accordance with the provisions of UDP Policy 17.	No change
83	Carol Walker	Questionnaire			
		Concerned about the possibility of developers building in back gardens.	addition	Does not relate to provisions of SPD. Policy 38 of the UDP addresses this.	No change
		In any area, there needs to be a mix of homes to maintain mixed and balanced communities.		Agree, however this is addressed in UDP Policy 17 which requires a mix of unit sizes in converted dwellings.	No change
84	Nicholas Wailes-Fairbairn	Questionnaire	-	-	-
85	Philip Ashford Clapham Society	Questionnaire			

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		A minimum distance between overlooking rooms should be adopted given the limited design skills of many applicants.	Section 4	In London in particular the distance between buildings is dependent on the existing character of streets. However guidance is set out in the Department for Transport's Manual for Streets (March 2007) which does not set fixed rules but highlights important design considerations and the SPD is considered to be acceptable in this respect.	No change
		Additional floors should not be encouraged where they have a negative effect on the surrounding townscape, particularly in conservation areas and listed buildings.	Section 6	Addressed at para. 6.4 of the SPD, under the heading 'Visual impact'.	No change
86	RPS For Fairview New Homes Ltd	Object to the residential space standards. Rigid requirements may make schemes unviable.	Page 3 Paras 1.11- 1.12	See Annexe to Appendix 1 (2)	No change
		Object to standards for provision of amenity space and play space in new developments.	Section 2	<p>Although not a requirement in PPS3, the provision of amenity space is nevertheless an important design consideration. This has been carried through into the SPD. In order to provide the certainty and consistency expected from development plans, standards and guidance on these issues have been proposed.</p> <p>This aspect of the SPD complies with UDP Policy 50 part (c), which supports provision of open space particularly where development adds to the demand for open space.</p> <p>The SPD also complies with Policy 50 Open Space and Sports Facilities, part (i) which relates to children's play facilities.</p>	No change
87	Notting Hill	Questionnaire			

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
	Housing				
		It is hardly ever possible for dwellings to have dual aspect orientation.	Page 2 Para. 1.4	The guidance at para. 1.4 advises that wherever possible dwellings should have dual aspect orientation, subject to the constraints of the site and other design considerations.	No change
		There may be a housing issue in terms of minimum size allowed for a single bedroom of 8 sq m.	Page 3 Para 1.12	The Council in the SPD sets out the minimum room sizes it feels are necessary to achieve a decent standard of accommodation. The space standards proposed by English Partnerships / Housing Corporation are greater than this.	No change
		For new build only the 1 bed 1 person figure seems too small.	Page 3 Para. 1.11	Noted, but this is in line with the study carried out by HATC for the GLA and similar to that of many used by other boroughs.	No change
		Typographical error in Figure 2, the space for a 2 bed, 3 person living room.	Page 3 Para. 1.12	Accept.	On page 3, Fig. 2, the living room for a 2 bed, 3 person home should be 13.0 sq m.
		Standards are different to Housing Corporation and NHBF.	General	A consistent set of standards appropriate to Lambeth was needed, setting out room sizes and overall floor areas.	No change
		In conversions it may not always be possible to have a mix of units.	Page 11 Para. 5.14	Accept.	To ensure consistency with UDP Policy 17 (c), add to para 5.14: “Where possible, a mix of unit sizes should be provided in conversions.”
88	DP9 Planning Consultants for Native Land	Object to the use of text “form follows function – that is all rooms should be designed according to their use.”	Page 2 Para. 1.3	The statement applies to the design and layout proposals at the planning application stage.	No change
		Object to ‘dual aspect orientation’	Page 2 Para. 1.4	Note use of words, ‘Wherever possiblesubject to the constraints of the site’. The SPD recognises dual aspect orientation may not be achievable in all schemes, but is an ideal which is aspired to.	No change
		Object to use of minimum floor areas. The Housing Corporation sets its own range of floor areas.	Page 3 Figure 1	See Annexe to Appendix 1 (2) The Council’s standards are lower than those proposed by English Partnerships / Housing Corporation and the Council	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
				does not object to anyone proposing larger accommodation.	
		A range of unit sizes should be offered for each type of residential unit and these standards should be lower than those in the draft SPD.	Page 3 Figure 1	See Annexe to Appendix 1 (2) Also this representation appears to contradict the previous comment. The standards in the SPD provide plenty of scope for developers to provide a range of different sized accommodation above the minimum.	No change
		Minimum room sizes are overly restrictive, difficult to achieve particularly in listed buildings or conservation areas.	Page 3 Figure 2	See Annexe to Appendix 1 (2) Also it is unclear why this should be an issue either in the case of listed buildings or conservation areas. In the case of listed buildings, sub-division should be mindful of the important features and layout which contribute to the listed status of a building and this will normally be the overriding consideration.	No change
		When added together there is potential for the minimum individual room sizes to add up to more than the minimum floor spaces for each apartment.	Page 3 Figures 1 and 2	As far as minimum standards are concerned, they are by their nature minimum standards and can provide flexibility, depending on the number of rooms being provided, to exceed the minimum.	No change
		Refer to balconies as an acceptable form of amenity space.	Page 5 Para. 2.6	Accept.	Replace sentence at para. 2.8 with: “For new flatted developments, shared amenity space of at least 50 sq m per scheme should be provided. A further 10 sq m per flat should be provided, either as a balcony/terrace/private garden or consolidated with the communal space.”
		Clarify the reference to ‘appropriate contributions’ as being financial contributions.	Page 5 Para. 2.6	Accept.	At page 5, para. 2.6, third sentence, replace “appropriate contributions” with “financial contributions”.
		The amenity space requirements	Page 5	The amenity space requirements have been used by	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		are excessive. Other factors such as proximity to existing open space should be considered.	Para. 2.8	Lambeth previously as a supplement to the adopted UDP from 1998. Although not a requirement in PPS3, the provision of amenity space is nevertheless an important design consideration. This has been carried through into the SPD. In order to provide the certainty and consistency expected from development plans, standards and guidance on these issues have been proposed. The proximity of existing public open space is not a practical substitute for private amenity space – for example, for hanging out washing; unsupervised children’s play; sitting out with visitors or guests etc.	
		Para. 2.9 states that ‘communal gardens should receive sunlight, even in winter’. This should be amended to read that communal gardens should have appropriate amenity and light given their location.	Page 5 Para. 2.9	Accept.	Amend text at para. 2.9, part (i) to: “receive natural light.”
		The requirement for children’s play space should be considered as part of the overall open space provision rather than ‘over and above’ the requirements set out in para. 2.8.	Page 6 Para. 2.12	Accept.	Amend second sentence of para 2.12 to: “Children and young people’s play space should be considered as part of the overall open space provision rather than ‘over and above’ the requirements or private or shared amenity space as set out above.”
		All types of housing are appropriate for overlooking play areas not just family housing.	Page 6 Para. 2.14	Accept.	At page 6, para. 2.14, amend text to: “Play areas should be easily accessible, overlooked by habitable rooms and enclosed either through fencing, railings or other safety features.”

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
89	George Graham	Made a number of comments in relation to sustainability and energy efficiency.	General	These issues will be addressed in a separate Sustainable Design and Construction SPD.	No change
90	Chris Rodger	Questionnaire			
		The reason English homes have amongst the smallest room sizes in Europe is because of planning policies that contain development into densely populated areas. Imposing standards on developers will lead to fewer homes and higher prices. We need less regulation in planning, not more.	General	See Annexe to Appendix 1 (2)	No change
91	South Circular Developments Ltd	Questionnaire			
		The standards will make house conversions unviable. There will be fewer conversions in Lambeth. The SPD will reduce the housing supply in Lambeth.	Section 1	See Annexe to Appendix 1 (2)	No change
		The SPD does not comply with PPS1 and PPS3. [It is not stated how]	General	South Circular Developments do not identify the specific points in PPS1 and PPS3 that they consider the SPD does not comply with.	No change
		If Building Control Regulations are adhered to, stacking should not be an issue.		In house conversions, noise disturbance between floors/units is a significant issue. There are more occupiers living in the converted dwelling than it was originally designed for. Stacking is an additional way of minimising noise disturbance between units/floors.	No change
		Daylight and Sunlight – how does it apply to conversions?	Section 3	As stated at para. 3.1, Section 3 applies to extensions and new build schemes only.	No change
92	Bromley Renovations	Questionnaire			
		Studio flats are a good source of affordable homes, being more	Section 5	The Council has a broad range of means to address the need for affordable housing, this needs to be set	Delete reference to studio flats not being acceptable in

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		affordable than new build homes.		in the context of the overall need to provide a range of different types of housing. Studio flats have not made a significant contribution to housing supply in recent years. However, the reference to studio flats not being acceptable in converted properties is being deleted from the SPD. See Annexe to Appendix 1 (1)	converted properties at paragraph 5.14.
		The overall floor sizes are designed to stop conversion of four bedroom, three storey rear addition houses into three flats. This has been done because of the pressure brought to bear by Council Members in certain wards.	Page 3 Figure 2	The SPD does not stop conversion of homes which meet the 120 sq m floor area threshold. The aim is to safeguard family sized housing and ensure that conversion provides good quality accommodation.	No change
		Storage provision is vague and open to interpretation.	Page 3 Para 1.10	The SPD sets out the general requirement to consider storage space but it would be too prescriptive to set actual totals for storage space.	No change
		Para. 5.9 (over-intensification) will stop almost all conversions in Lambeth. Almost all conversions require an extension to meet size standards.	Page 11 Para. 5.9	Conversions can still take place but they need to be of an appropriate standard so as to avoid over intensive development. This aspect complies with UDP Policy 17, part (c), which states that over-intensive schemes will be resisted. If extensions are required in order to meet space standards, this may well be indicative of over intensive development of an existing building.	No change
		Building Regulations deal with sound insulation between flats.	Page 11 Para. 5.15	In house conversions, noise disturbance between floors/units is a significant issue. There are more occupiers living in the converted dwelling than it was originally designed for. Stacking is an additional way of minimising noise disturbance between units/floors.	No change
93	Kennington Association	Questionnaire.	-	-	-
		Supports the Parker Morris standards as a minimum.	Section 1 Section 5	Noted.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
94	Home Builders Federation	Internal layouts of dwellings are within the remit of Building Regulations not the Town and Country Planning Act.	Page 2 Section 1	The Council is not seeking to dictate layout but to ensure appropriate quality of space provision and to avoid over intensive development.	No change
		HBF objects to space standards. Increasing these standards will reduce the number of homes being built. These large homes will in any case be more expensive and unaffordable.	Section 1	A study carried out by HATC on behalf of the GLA concluded that space standards would not have a substantial impact on housing supply. The HBF are aware of this study. The Council's planning policies in the UDP which was only adopted in August 2007 are already yielding substantial amounts of affordable housing. Also see Annexe to Appendix 1 (2)	No change
		Clarify 'private amenity space' refers to 'private gardens'.	Page 5 Para. 2.7	Accept.	At paragraph 2.7, replace "private amenity space" with "private amenity / garden space".
		Object to 30 sq m per house being applied uniformly in all developments across the borough.	Page 5 Para. 2.7	This aspect of the SPD complies with UDP Policy 50 part (c), which supports provision of open space particularly where development adds to the demand for open space.	No change
		The provision of 50 sq m of communal gardens with an additional 10 sq m seems overly high and may be financially unviable.	Page 5 Para. 2.8	This aspect of the SPD complies with UDP Policy 50 part (c), which supports provision of open space particularly where development adds to the demand for open space.	No change
		Clarify that by the landscape management and maintenance programme, there is not duty on the developer to pay for long-term maintenance on site.	Page 6 Para. 2.11	Arrangements must be in place for the long-term management and maintenance of shared gardens and play space. There must be a duty upon leaseholders to pay for the management and maintenance of these spaces. It is essential	Amend last sentence of para 2.11 to: "Compliance with this aspect of the guidance will be secured through a Section 106 Agreement."

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
				that this is properly secured in perpetuity of the development. The most effective way of achieving this is through a Section 106 Legal Agreement.	
		The requirement for children's play space is too inflexible. It should only apply to developments of family units.	Page 6 Para. 2.12	The requirement is already flexible in that children's play space will be sought where appropriate to a development.	No change
		HBF notes the London Plan requirement for Lifetime Homes. However there are cost implications and matters are addressed under Building Regulations Part M.	Page 15 Section 7	The SPD reflects the contents of the London Plan, which is part of the statutory development plan for the Borough.	No change
95	Skyline Designs Ltd	Questionnaire			
		House to flat conversions play an important role in providing a range of new private housing, from 1 bed, 2 bed to family sized units. They are only possible through roof and ground floor extensions.	Page 11 Para 5.10	The SPD does not preclude extensions. Para. 5.10 states that extensions will need to comply with Policy 36. If it is determined at the planning application stage that an excessive number of units are proposed within a house conversion, enabled by inappropriate extensions at ground or roof level, this would be deemed unacceptable. This does not preclude appropriate extensions at ground and roof level.	No change
96	Emery Planning Partnership	Questionnaire			
		The guidance is unclear and provides no indication of what will be considered a good standard of daylight/sunlight.	Page 3 Section 3	The SPD is clear that all development will be checked against BRE standards and guidelines.	No change
		Mix of units – 45 sq m is too high for a studio flat.	Page 10 Section 5	A minimum floor area for a 1 bed flat is 45 sq m and this is similar to that used by many other boroughs and less than that proposed in the English Partnerships / Housing Corporation standards.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		Handing and stacking – the guidance is too prescriptive and inflexible. It fails to take into account noise reduction measures.	Page 11 Para. 5.15	Handing and stacking are design and layout features which provide added protection against noise for occupiers. They also relate to UDP Policy 17 (d) which addresses the quality of conversions, part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
		Room sizes – the 1 bed 1 person studio should be allowed in house conversions – otherwise schemes would be unviable. A mix of housing should be acceptable, in line with PPS3, to encourage mixed communities.	Page 3 Figure 2	The Council is seeking a range and mix of housing. This includes a need to retain family sized housing in the Borough. Over 85% of dwellings created by house conversions are 1 and 2 bedrooms. Policy 17 highlights concern about intensive development. This is not an issue in the policy relating to new build development. The space standards are similar to those used by many other boroughs and less than proposed in the English Partnerships / Housing Corporation standards. However, the reference to studio flats not being acceptable in converted properties is being deleted from the SPD. Also see Annexe to Appendix 1 (1)	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		In conversions, like in new build schemes, the 1 bed 1 unit home should be acceptable. The minimum flat size of 45 sq m is too high for a conversion.	Page 3 Figure 2	See Annexe to Appendix 1 (1) and (2)	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		Mitigation measures other than handing and stacking can be used to reduce the impact of noise.	Page 14 Section	Handing and stacking are design and layout features which provide added protection against noise for occupiers. They also relate to UDP Policy 17 (d) which addresses the quality of conversions, part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
97	GLA	Housing schemes in receipt of Social Housing Grant from the Housing Corporation will be required to meet the Housing Corporation's	General	Noted.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		Design and Quality Standards.			
		Amenity space – GLA strongly supports the requirement for outdoor amenity space and children’s play space and the reference to the Mayor’s draft SPG.	Page 5 Section 2	Noted.	No change
		House conversions – there is no specific London Plan policy on conversions, though para. 3.12 points out that conversions are a component supply that will meet housing targets.	Page 10 Section 5	Noted.	No change
		The Mayor’s Housing SPG notes that across London the contribution of conversions to housing supply has reduced from one third in the early 1990s to less than 10%. However, in Lambeth conversions make a more significant contribution to housing supply.	Page 10 Section 5	The London Plan does not specify how the housing target should be met. It states that boroughs should promote policies that seek to achieve and exceed this target. It is up to the Council to decide how to meet the targets for additional housing in the light of its local housing needs assessment. It is not considered that the SPD will affect the Council’s ability to meet its London Plan housing target. The SPD is therefore in general conformity with the London Plan. It expands and provides further guidance on policies in the recently adopted UDP, which has been accepted as being in general conformity with the London Plan. See Annexe to Appendix 1 (1)	No change
		Given the relatively fixed form of houses to be converted and the fact that the upper floors lend themselves to conversion to studio flats the blanket prohibition on studio flats set out in paragraph 5.14 could inhibit conversion activity. This would affect the supply of new housing in Lambeth and is therefore	Page 10 Section 5	Studio flats have not made a significant contribution to housing supply in recent years. However, the reference to studio flats not being acceptable in converted properties is being deleted from the SPD. See Annexe to Appendix 1 (1) Objection withdrawn by letter dated 18 December 2017. See Appendix 6.	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		a strategic concern. The draft SPD states that studio flats are not acceptable because they reflect over intensification. However, there is no explanation or evidence as to why studio flats would lead to over intensification and it seems unlikely that they always automatically would. In this respect, unless there is evidence to the contrary, the SPD would harm the implementation of the London Plan and is therefore not in general conformity			
		A blanket ban towards studio flats appears to be bringing in policy via an SPD, which should not be the case, and goes beyond the scope of the adopted UDP.	Page 11 Para 5.14	The SPD is not bringing in new policy. It expands on the provisions of Policy 17 of the adopted UDP relating to conversions in the Borough and sets out space standards to address the issue and explain the interpretation of Policy 17 in respect to over intensification in the conversion of existing properties. Objection withdrawn by letter dated 18 December 2007. See Appendix 6.	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		Similarly, given the relatively fixed form of houses to be converted, the minimum unit size would appear to be hard to meet and could further inhibit conversion activity, thus harming housing supply in Lambeth and affecting the implementation of the London Plan.	Page 11 Para 5.22	The Council has already an identified 5 year supply at the outset of the 10 year target for Lambeth in the London Plan. Therefore the Council is confident in being able to meet the 10 year target. Also, a study by HATC, commissioned by the GLA , concluded that space standards would not have a substantial impact on housing supply. See Annexe to Appendix 1 (2) Objection withdrawn by letter dated 18 December 2007. See Appendix 6.	No change
		Lifetime homes – Lambeth's		Noted and accepted cross references to be added as	Add references to the Mayor's

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		commitment to s seek to ensure that all new housing is built to Lifetime Home standards and that 10% of all new homes should be designed to be wheelchair accessible or easily adaptable for wheelchair users is strongly supported. Suggested that the SPD could usefully refer to the Mayor's Accessible London SPG in the Lifetime Homes section. The Mayor has produced draft best practice on wheelchair accessible housing, which the SPD could usefully refer to.		requested.	Accessible London SPG in the Lifetime Homes section and also to the Mayor's draft best practice on wheelchair accessible housing.
98	Lambeth Partnership Robert Harrison	HMOs are now the main source of new burglaries in Lambeth. Under S17 of the Crime and Disorder Act, the Council has a responsibility to ensure that all new developments comply with minimum Secured by Design standards.	addition	These issues are addressed by the Council's draft Safer Built Environments SPD. However this particular point can be highlighted in this SPD as well.	Insert new para 1.13 entitled "Safety and Security" to read: "Under Section 17 of the Crime and Disorder Act the Council has a responsibility to ensure that all new developments comply with Secured by Design standards. Further details on this can be found in the SPD on Safer Built Environments."
99	Cllr. Jeremy Clyne	Concern that reference to "sunlight, even in winter" in para 2.9 (i) gives no indication of how much sunlight should be received.	Page 5 Para 2.9	Noted. This would be too prescriptive however, it is better to refer to natural light.	Amend text at para. 2.9, part (i) to: "receive natural light."
		The section on minimum distances only refers to the distance between the windows of habitable rooms of different units. No account is taken,	Section 4	Distances between buildings are particularly important when windows of habitable rooms from opposing buildings face one another. Where windows of non-habitable rooms are involved there is less	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		for example, of where a kitchen window faces a bedroom or living room.		concern because these windows are little used and loss of privacy does not occur. The Council has traditionally considered a kitchen of over 13 square metres to be an habitable room.	
		Concern over instances where developers build extensions to a house in single occupancy allowed for under permitted development in order to meet the minimum floorspace requirements for conversion to flats. The section should mention the loss of family sized housing, the resulting proliferation of small units and change in the character of the area that flat conversions cause.	Page 11 Paras 5.9- 5.13	Noted. This is why Policy 17 of the UDP states that only dwellings with an original pre-1948 un-extended floor area of 120 square metres will be considered for conversion.	No change
		The level of protection provided against noise disturbance in conversions needs to be strengthened.	Page12 Paras. 5.16 – 5.18	Noise regulation is a matter for Building Regulations and the Council does not have planning powers to go beyond this. However, a reference promoting higher levels will be inserted in the Good Practice section encouraging the implementation of higher standards.	A new section on good practice has been inserted into the SPD. Within this insert: “In all conversions the Council will seek higher noise insulation standards than those set out in the Building Regulations to try and minimise noise disturbance.”
		Given that it is widely accepted that the Building Regulations do not provide for adequate insulation in respect of handling and stacking, there should be something more than just “encouraging” developers to meet the same standards as are required for new flats. It is not clear what is meant by saying “special	Page 12 Paras 5.16- 5.18	As above.	As above

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		noise insulation measures will be sought” where it has not been possible to meet the council’s requirements in this respect, nor is it clear what these requirements are.			
		More needs to be said in para 5.18 about the particular problems of handling where disturbance is created through the conversion of a property into flats which are adjacent to an unconverted property, for example. This can produce bedrooms next to living rooms, kitchens and bathrooms.	Page 12 Para 5.18	Accepted. As above.	As above
100	Elizabeth Jones	Questionnaire			
		Studio flats are a good source of affordable homes, being more affordable than new build homes.	Page 11 Para 5.14	Studio flats have not made a significant contribution to housing supply in recent years. However, the reference to studio flats not being acceptable in converted properties is being deleted from the SPD. The Council’s planning policies in the UDP which was only adopted in August 2007 are already yielding substantial amounts of affordable housing. Also Annexe to Appendix 1 (1)	Delete reference to studio flats not being acceptable in converted properties at paragraph 5.14.
		Overall floor areas are designed to stop the conversion of four bedroom, three story rear addition houses into three flats. This has been done because of the pressure brought to bear by council members in certain wards.	Page 13 Para 5.22	The SPD does not stop conversion of homes which meet the 120 sq m floor area threshold. The aim is to safeguard family sized housing and ensure that conversion provides good quality accommodation.	No change
		Para. 5.9 (over-intensification) will stop almost all conversions in Lambeth. Almost all conversions	Page 11 Para 5.9	Conversions can still take place but need to be of an appropriate standard so as to avoid over intensive development. This aspect complies with UDP Policy	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		require an extension to meet size standards.		17, part (c), which states that over-intensive schemes will be resisted.	
		Building Regulations deal with sound insulation between flats.	Page 12 Paras 5.16-5.17	In house conversions, noise disturbance between floors/units is a significant issue. There are more occupiers living in the converted dwelling than it was originally designed for. Stacking is an additional way of minimising noise disturbance between units/floors.	No change
101	Duncan Eastoe	Questionnaire	-	-	-
102	Barton Wilmore (on behalf of Berkeley Group)	Residential Space Standards The Council should promote a more flexible approach to achieving internal space standards. Developments should be judged on a 'case-by-case' basis, with each site considered on its own merit thus encouraging innovative design and space use. It should be made clear that the space standards provided in the document are for guidance and not minima.	Paras 1.7 – 1.9 & 1.12	Space standards provide clarity, consistency and certainty required from the planning system. Over two thirds of London Boroughs use space standards. See Annexe to Appendix 1 (2)	No change
		Amenity Space and Play Space for New Developments The Council should encourage a more flexible approach towards amenity space standards. Paragraph 2.6 should be amended as per the text in the comments form (see form 102).	Page 5 Paras 2.6 – 2.9	The provision of amenity space is an important design consideration and is important for households in their day to day lives. The guidance in the SPD is flexible as it sets out a variety of ways that amenity space could be provided.	No change
		Amenity Space and Play Space for New Developments Planning obligations (referred to in para 2.6 & 2.12) regarding outdoor amenity space should accord to the	2.6 & 2.12	Noted. The Council considers that the tests of soundness set out in Circular 05/05 are complied with in this instance as this deals with the direct impact of development.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		'tests of soundness' set out in Circular 05/05.			
103	Carol Charles Littler	Support for the supplementary measures, does not want houses such as those in Streatham Vale to be turned into 'high occupancy flatlets', which would put undue pressure on services and cause inconvenience and noise to locals.	General	Noted.	No change
104	Sarah Griggs	Support for the supplementary measures, will lead to safeguards and reduce the current 'conversion frenzy' trend.	General	Noted.	No change
105	Simon Early	Questionnaire			
		Issues with regards residents of newly converted flats being ineligible for parking permits if the property is in a CPZ. Feels there should be an 'obligation' that prospective tenants are informed of the 'permit-free' nature of the property.	Page 13 Paras 5.25-5.25	Noted and agreed. Prospective tenants should always be informed via the search process about the permit free nature of the property.	No change
106	C Mahalski	Support for the supplementary measures, however feels they should be more in-line with neighbouring boroughs standards (Croydon for example) in order to achieve Lambeth's overall objective.	General	Noted. The standards in the SPD are similar to those of most London boroughs.	No change
107	Angelika Hibbett	Support for the supplementary measures.	General	Noted.	No change
108	Brian Bloice	Support for the supplementary measures	General	Noted.	No change
109	Paul Kleinman	Issues over House Conversions:			
		Minimum floor areas , feels the	Section 5	Studio flats have not made a significant contribution	Delete reference to studio

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		new proposals will stop conversion to studio flats and thus a good source of affordable housing (against government policy?). Queries room sizes – specifically, what size should additional double bedrooms be if main bedroom is 12sq.m? Notes typographical error on page 3, Fig 2.		to housing supply in recent years. However, the reference to studio flats not being acceptable in converted properties is being deleted from the SPD. The Council's planning policies in the UDP which was only adopted in August 2007 are already yielding substantial amounts of affordable housing. Also see Annexe to Appendix 1 (1)	flats not being acceptable in converted properties at paragraph 5.14. On page 3, fig. 2, the living room for a 2 bed, 3 person home should be 13.0sq.m and has been amended accordingly.
		Over intensification , feels 5.9 will stop almost all conversions in Lambeth as housing stock large enough to convert will be nonviable. Believes 5.11 – 5.13 are too vague and will lead to abuses of the system.	Page 11 Paras 5.9 & 5.11-5.13	Conversions can still take place but need to be of an appropriate standard so as to avoid over intensive development. This aspect complies with UDP Policy 17, part (c), which states that over-intensive schemes will be resisted. However, being prescriptive about 'over intensification' reduces flexibility. The Council feels that it is right that it should identify over intensification as an issue.	No change
		Mix of units , feels 5.14 has been lifted from Wandsworths SPG, would like clarity on what Lambeth's mix of units would be.	Page 11 Para 5.14	The SPD requires a mix of unit sizes in accord with Policy 17 of the UDP. The Council wishes to retain some flexibility in the mix of unit types secured in house conversions as indicated in the Policy.	No change
		Handing and Stacking of rooms/noise insulation , feels there are adequate building regulations in place with regards noise insulation. If insufficient then specific sound limits should be stated. Feels this point could be used as an excuse to refuse conversions.		Handing and stacking are design and layout features which provide added protection against noise for occupiers. They also relate to UDP Policy 17 (d) which addresses the quality of conversions, part (i) requires noise transmission to be minimised through appropriate handing and stacking.	No change
110	Keith Hill MP	Support for the supplementary measures	General	Noted.	No change
111	Montagu Evans (on behalf of Ludgate Land Ltd)	Residential Space Standards , should be applied flexibly in light of individual site circumstances and development type. Thus allowing for	General	Noted. See Annexe to Appendix 1 (2)	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		a range of housing units that meet the Council's intentions.			
		Believes the space standards table is incorrect – Living room/2 bed – 3 person units	Para 1.12 Fig 2	Accept.	On page 3, Fig. 2, the living room for a 2 bed, 3 person home should be 13.0 sq m and has been amended accordingly.
		Amenity Space and Play Space for New Developments , believes the 50m ² plus 10m ² of amenity space per flat to be over-prescriptive and will impact large scale developments. Would like a flexible approach to be adopted taking into account individual site circumstances and location specifics.	Page 5 Para 2.8	Accept. The Council propose to introduce more flexibility into the standard by including balcony provision.	Replace sentence at para. 2.8 with: “For new flatted developments, shared amenity space of at least 50 sq m per scheme should be provided. A further 10 sq m per flat should be provided, either as a balcony/terrace/private garden or consolidated with the communal space.”
		Daylight and Sunlight , feels BRE guidance should not be applied at the expense of ‘innovative and dense design solutions’ that meet PPS3’s aim of making the most efficient use of land. Supports the UDP stance rather than the extended SPD stance.	Page 7	Noted. However, the Council is merely setting out in the SPD the standards and guidance laid down by the BRE, which most local authorities adhere to.	No change
		Privacy and Spacing between Buildings , would like a flexible	Page 8 Paras 4.4-	The Council believes that the approach set out in the SPD to privacy and overlooking is flexible. Fixed	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		approach to be taken with regards building spacing and layout rather than a prescriptive approach. Feels that the privacy and overlooking solutions suggested in the SPD are contradictory.	4.10	distances are avoided in order to allow the design led approach to come up with innovative solutions to privacy and overlooking issues.	
112	Nilufer York	Questionnaire			
		Generally fears the SPD will be viewed as a guideline document and will therefore be open to interpretation, however believes that without it the UDP will result in poor, less regulated & lower standards conversions / overcrowding / parking problems / increased crime / service issues / environmental issues.	General	Noted. The SPD elaborates on the policies contained in the UDP and tries to ensure that only good quality conversions are carried out in the Borough. The impact will be to prevent sub standard flats being created and to ensure that the type of accommodation being provided ensures a good standard of living for its occupants. Policy 17 of the accompanying UDP aims to protect the supply of small family housing accommodation in the Borough by preventing conversion of house below 120 square metres in size.	No change
113	Anna Tomlinson	Questionnaire			
		Believes privacy and spacing guidance should specify noise pollution, as well as overlooking, arising from open windows.	Pages 8-9 Section 4	The Council accepts that noise pollution is a major concern for many local residents. Nevertheless control of noise pollution arising from residential development is not within the scope of planning powers and is therefore not included in the factors set out in this section.	No change
114	Laleh Laverick	Support for the supplementary measures – various reasons why specified.	General	Noted.	No change
115	Lindy Cunniffe	Support for the supplementary measures – various reasons why specified	General	Noted.	No change
116	Tim Pope	Believes the SPD 'as drafted' waters down UDP flat conversion policies rather than clarifying and expanding on those policies.	Page 5	The SPD elaborates on the flat conversion policy in the UDP. It does not introduce new policy nor water down what is in the UDP. Rather it provides guidance in deciding future flat conversion	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
				applications.	
		Believes 'basement flats' should be mentioned in 5.9 with reference to over-intensification.	Page 11 Para 5.9	Not accepted. It is not considered that a basement flat in a converted property would not necessarily represent over-intensification or produce a flat of inadequate quality. The guidance in Policy 17(c) is considered to be satisfactory. It states, "Basement excavations, the subdivision of existing flats and of floors between flat units will be permitted only where the size and layout of units is satisfactory, and units have satisfactory light."	No change
		Feels that Lambeth should be doing more to accommodate families (with houses rather than 2/3 bed flats).	General	Noted. The Council is seeking to secure a range and mix of housing in Lambeth. Policy 17 of the UDP aims to protect the supply of small family housing accommodation in the Borough by restricting conversion of houses below 120 square metres in size. It is anticipated that the SPD will further help to protect small family houses ensuring that only good quality conversions are carried out in the Borough. The impact will be not to allow flats of inadequate quality being created and to ensure that the type of accommodation being provided includes a mix of dwelling type and ensures a good standard of living for its occupants.	No change
117	Alsop Verrill	Questionnaire			
		Believes that 'circulation space' (hallways, lobbies, etc.) are not always appropriate or necessary. The local planning authority should not be dictating residential dwelling layouts.	Page 2 Para 1.3	The Council considers that circulation space is an important part of ensuring good quality in the standard of living accommodation.	No change
		Feels that the requirement for amenity space for flats is unclear. The text requires greater clarity.	Page 5 Para 2.8	Accept. The Council has amended the standard to including balcony provision.	Replace sentence at para. 2.8 with: "For new flatted developments, shared amenity space of at least 50 sq m per scheme should be

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
					provided. A further 10 sq m per flat should be provided, either as a balcony/terrace/private garden or consolidated with the communal space.”
		Believes that guidance on open plan kitchens (kitchen / dining / living) should be amended as this style of kitchen is now considered standard. The local planning authority should not be dictating residential dwelling layouts and that kitchen's are segregated from living areas.	Page 11 Para 5.9	The guidance does not preclude open plan kitchens but states that a sign of over intensification could be where the conversion has a dominance of kitchens which form part of an open living, dining, kitchen area.	No change
118	Maya Matthews	Questionnaire			
		Conversions should allow for sufficient living space, not change the external appearance of a property or affect the character of an area. The number of flats per conversion should also be looked at in relation to parking stress. Unauthorised alterations should also be stopped immediately.	Page 10 Section 5	Noted. These are all factors which are considered when determining an application for a house conversion. The SPD elaborates on many of these points.	No change
119	David Mead	Flats tend to go to singles/couples, not families thus affecting local school roll calls and in the long term affecting school funding.	Page 10 Section 5	Noted. The SPD, together with the accompanying UDP, is trying to ensure that house conversions contribute to the creation of sustainable, liveable and mixed communities as set out in government guidance (PPS1). Both documents strive to ensure that a mix of unit sizes is provided in any application involving a house conversion. There is a requirement that in any conversion a family sized unit of 2 or more bedrooms should be provided on the ground floor with access to a garden.	No change
		Flat Conversions increase on street	Page 10	Noted. Parking is a key issue when determining	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		parking and have a knock-on effect to pedestrians (children, etc.).	Section 5	applications for house conversions. Any application must comply with the provisions of Policy 14 (f) of the UDP.	
120	Nigel & Jan Taylor	Questionnaire	-	-	-
		Support for the supplementary measures.	General	Noted.	No change
		The SPD will hopefully strengthen the existing planning regime and prevent the sometimes overbearing practices of developers.	General	Noted.	No change
		Conversions usually have the effect of depleting housing stock (family homes with 3 or more bedrooms). Though there is a place for flats perhaps additional floors to existing houses should be encouraged.	Page 10 Section 5	Noted. The SPD, together with the accompanying UDP, is trying to ensure that house conversions contribute to the creation of sustainable, liveable and mixed communities as set out in government guidance (PPS1). Both documents strive to ensure that a mix of unit sizes is provided in any application involving a house conversion. There is a requirement that in any conversion a family sized unit of 2 or more bedrooms should be provided on the ground floor with access to a garden. Additional floors on houses can be very problematic as there can be adverse effects on the amenities of surrounding occupiers and the appearance of the street scene. It is not something that the Council would want to generally encourage.	No change
		The issue of void residential properties should be looked into. Perhaps with the Council taking over the management of these properties or requiring developers to explain why their scheme is unsuitable for one of these properties.	General	Noted. But this goes beyond the scope of planning control.	No change
121	Cllr David Malley	Questionnaire			

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		An already excessive number of conversions leads to cramped flats, reductions in family housing and bad living conditions for those in the flats and surrounding people. Conversions should be a good size and overall do not unduly affect the number of 4 bed houses.	Page 10 Section 5	Noted. The SPD, together with the accompanying UDP, is trying to ensure that house conversions contribute to the creation of sustainable, liveable and mixed communities as set out in government guidance (PPS1). Both documents strive to ensure that a mix of unit sizes is provided in any application involving a house conversion and that the resulting flats are of a good quality. In addition, there is a requirement that in any conversion a family sized unit of 2 or more bedrooms should be provided on the ground floor with access to a garden.	No change
		The SPD could be improved by restricting conversions of 2 storey houses and specifying the minimum floor area for conversion is 170sqm. Insist that developers meet requirements such as environmental aspects and school contributions.	General	The SPD can only elaborate on policy 17 of the UDP. It therefore can not now introduce a requirement restricting 2 storey houses from development nor introduce a minimum floor area of 170sq metres.	No change
122	Val William Bartlet	Questionnaire			
		Support for the supplementary measures.	General	Noted.	No change
		Developers work on the property before planning permission has even been applied for. A possible remedy is to delay the initial site visit and then if work has started refuse the application and request the property is put back to its original state. If permission is granted then more frequent site visits.	General	Noted. The Council will carry out enforcement investigation of any property, which has been converted prior to gaining a planning permission.	No change
		Parking issues associated with conversions. A possible remedy is to allow only one van/car per new residence/flat on conversion	Page 13 Paras 5.24- 5.25	The Council's standards for parking are set out in Policy 14 and accompanying Table 6 of the adopted UDP.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		applications.			
		House conversions cause population increases and have the knock effect of increasing service stress (transport, schools). A remedy might be to limit house conversions to a maximum of 2 flats only.	Section 5	Noted. The population of Lambeth is projected to grow over the next 10 years. The demand for new homes in the Borough is being addressed in various ways including the conversion of houses into flats which helps to increase the supply of housing available in Lambeth. The result of population growth will be to increase demand on service facilities such as schools, shops and public transport. However, limiting conversions to a maximum of 2 flats would be to introduce a new policy.	No change
		Amend the SPD to include mention of additional residential floors to commercial buildings as well as residential.	Section 6	The provision of additional residential floors on existing commercial properties can be problematic from a number of viewpoints. It can impinge on the continued viability of the existing commercial use through complaints from the new residents about noise, disturbance, smells and so on. Provision of separate access to residential on the upper floor can also be difficult. For these reasons the SPD does not mention this idea.	No change
		There appears to be confusion as to the definition of a home and minimal floorspace.	General	Not accepted. There are a wide range of options of what rooms a home can include and the SPD provides guidance on appropriate space standards.	No change
123	Sally Horrox	Support for the supplementary measures, feels that conversions squeeze too much space out of a property at the expense of insulation (noise, etc.), add to parking stresses and effect servicing access.	General	Noted.	No change
124	Fiona Dixon	Questionnaire			
		Section 4 should be amended to include minimum standards for privacy and spacing.	Section 4	Section 4 sets out the general principles regarding overlooking and privacy. The Council uses a design led approach which does not set out any fixed rules or physical distances to be adhered to but takes account of a range of factors when deciding on	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
				acceptability of distances between buildings.	
		Section 6 should stress the effect additional floors have on parking facilities, congestion to amenities, etc.	Section 6	Accept.	Add to end of para 6.4: "The effect of additional floors on parking and amenity provision should also be carefully considered."
125	Eileen Reid	Support for the supplementary measures.	General	Noted.	No change
		The SPD should retain the Minimum Floor Area requirement from the UDP (Policy 17).	General	This is the case.	No change
		Importance should be applied to the stacking of rooms when converting houses and the associated impact.	General	Noted. The SPD addresses this issue and gives appropriate guidance on the matter.	No change
		External appearance and noise insulation is important.	General	Noted.	No change
		A point that appears to be missing from the SPD is the fact that many loft extensions damage the adjoining properties. The party wall agreement is not sufficient protection.	General	Noted. However, many loft conversions do not need planning consent and party wall issues are matters for civil legislation.	No change
126	York Martin	Questionnaire			
		Generally supportive for the supplementary measures	General	Noted.	No change
		Section 1- minimum standards are about right.	Section 1	Noted.	No change
		Issues / concerns that planning officers do not understand the BRE Digest 209. Consultants are only viable for larger scale developments. Reference to protection by the Prescription Act of 1832.	Section 3	Daylight and sunlight issues can be complex especially in large high density schemes. Consultants are engaged to carry out or review BRE assessments where these issues are complex. However, in the majority of cases Council Planning Officers are able to assess the impact of a development on levels of and impact on daylight and sunlight.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		The overlooking and privacy issues should be looked at in relation to living rooms as well as bedrooms.	Section 3	Noted. This is the case.	No change
		The minimum floor sizes are on the low side. A requirement for 3 bed units should be made in 5.14. Reference to amenity spaces (rear gardens) should be mentioned.	Page 11 Para 5.14	The Council defines a family sized unit as being of two or more bedrooms. The Council seeks provision of a family sized unit from conversions at ground floor level. It will not however, always be possible to provide a 3-bed unit at ground floor level. Access to amenity space (rear gardens) is already mentioned in paragraph 5.14.	No change
		The scale of potential additional floors and their effect on surrounding properties, etc. needs to be considered in the SPD.	Section 6	Noted. This is why the SPD has a separate section on additional floors.	No change
		How are these proposals to be monitored and controlled?	General	In the same way that all developments are controlled and monitored. Most development will require planning permission and will need to comply with Building Regulations. Failure to do so will result in the Council carrying out enforcement investigation.	No change
		More resources should be given to Enforcement so that regulations and polices with regards Conversions are adhered to and corrected where breached.	General	Noted. This does not relate to contents of the SPD.	No change
127	Cllr Toren Smith	Questionnaire			
		A 'Lambeth standard' should be created and promoted that goes above just Building Regulation standards, especially on sound insulation.	Page 12 Para 5.17	Whilst appreciating the intent of the suggestion this would be difficult to implement, as it would be a voluntary code, which would go beyond what is required by national legislation. Legislative backing is very important in ensuring effectiveness of a higher Lambeth standard. However, a new section has been introduced into the SPD entitled 'Good Practice' and within it there is now a reference to seeking a standard higher than that set by Building Regulations.	A new section on good practice has been inserted into the SPD. Within this insert: "In all conversions the Council will seek higher noise insulation standards than those set out in the Building Regulations to try and minimise noise disturbance."

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		External pipe work should not be allowed at the front of the property.	Page 12 Para 5.20	Although the Council cannot control the location of pipe work it can encourage good sense and practice to reduce the visual impact. A reference has been inserted into the 'Good Practice' section of the Housing Development SPD.	A new section on good practice has been inserted into the SPD. Within this insert: "External pipework at the front of the property should be avoided."
128	Drivers Jonas on behalf of London Fire and Emergency Planning Authority	Design guidelines should include: (1) Hard wired smoke alarms; (2) Installation of sprinkler systems according to risk; (3) Design measures to reduce arson.	General	Noted. However these matters are beyond the scope of planning control and should not be included in the SPD.	No change
		SPD is too prescriptive and designs should be reviewed on a case-by-case basis.	General	The Council considers that the SPD will ensure the quality of housing provision in the Borough. The SPD also offers developers consistency in decision making.	No change
		SPD should take into account the London Safety Plan.	General	Noted. The SPD is about the application and interpretation of the UDP and where appropriate includes references to other national and regional planning policies.	No change
129	Peter Lloyd	Questionnaire	-	-	-
130	Raymond & Elizabeth Manley	Questionnaire	-	-	-
131	Caria Luman, Stanthorpe Triangle Residents Association	Questionnaire	-	-	-
132	Helen O'Riain, Stanthorpe Triangle Residents Association	Questionnaire	-	-	-

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		Standards proposed are better than nothing.	Section 2	Noted.	No change
		Minimum standards proposed are inadequate.	Section 4	Noted. The standards in the SPD are similar to those used by many London boroughs.	No change
		Conversion standards need improving/tightening.	Section 5	Noted. The standards in the SPD are similar to those used by many London boroughs.	No change
133	Alan Piper, Brixton Society	Questionnaire			
		The SPD should be part of the LDF or UDP and exposed to wider public scrutiny.	General	The SPD elaborates on policies in the UDP, which were subject to the full statutory planning process. The SPD has been prepared in accordance with Government guidance and legislation on the preparation of SPDs and consultation has been carried out in accordance with the Council's Statement of Community Involvement.	No change
		Older housing stock should not be replaced by newer housing of poorer overall quality.	General	One of the main reasons why the SPD has been introduced is to try and ensure that the quality of new housing schemes being developed in the Borough is of an appropriate standard.	No change
		It seems that standards are more relaxed for larger developments and tighter for alteration and conversion of individual properties, the SPD seems to reflect this.	General	The Council is particularly concerned about ensuring the quality of house conversions in the Borough as these are particularly sensitive. However, the SPD is aiming to ensure the quality of all housing developments in the Borough.	No change
		No attention is given in the SPD to energy conservation or 'green issues'.	General	The UDP already contains Policy 34 (Renewable Energy) and Policy 35 (Sustainable Design and Construction). This is to be supplemented by the Council's SPD on Sustainable Design and Construction.	No change
		Setting space standards for individual rooms is the most effective way to ensure that adequate space is provided. Minimum dimensions are less effective and flexible than minimum	Section 1	Noted.	Remove para. 1.8 relating to minimum room dimensions.

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		floorspace.			
		Fig 1 in para 1.11 (now 1.10) should be deleted. Setting overall floor areas does not promote efficient use of space.	Page 3 Para 1.11 (now 1.10)	Noted. However, the Council believes that minimum overall floor areas are necessary to achieve good sized flats. See Annexe to Appendix 1 (2)	No change.
		Bedrooms: query why no reason has been given for increasing the minimum room sizes.	Page 2 Para 1.7	The floorspace standards for flats and rooms set out in the SPD are consistent with the standards being applied by other London boroughs and the standards proposed in the Housing Space Standards report prepared for the GLA (HATC report on Housing Space Standards August 2006) as well as that recently drawn up by English Partnerships. See Annexe to Appendix 1 (2)	No change
		Kitchens: concerned that no guidance is given on design of kitchens. In 2 bed or more properties they should be separate from the living room.	Section 1	There is a need to strike a balance in providing flexibility in the design of accommodation. As long as accommodation is large enough it is not necessary to be so prescriptive.	No change
		Para 1.9 (now 1.8): Guidance on ceiling heights is ambiguous. Sentences need revising.	Page 3 Para 1.9 (now 1.8)	Not accepted. The wording is considered to be clear.	No change
		Storage Space para 1.10 (now 1.9): The principle is supported but the detail should be carried through with definitive figures in para 1.12 (now 1.11) Fig 2. Storage figures should be included in the table but the overall floor areas deleted. There should be flexibility in provision.	Page 3 Para 1.10 (now 1.9)	Storage figures are not included in Fig 2 because it is considered that storage space will vary according to the type of home being provided.	No change
		Para 2.6 The practicality of off-site provision is doubted and should not provide a justification for sub-standard housing.	Page 5 Para 2.6	Noted. The purpose of the SPD is to ensure that sub-standard housing is not created.	No change
		The return of a set figure for private	Page 5	Noted.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		garden space for houses is welcomed.	Para 2.7		
		In the provision of amenity space there should be a closer relationship between number of dwellings and total area taking into account outdoor space including balconies.	Page 5 Para 2.8	The SPD already takes account of the number of dwellings being created as it requires an additional 10sq metres of amenity space per flat provided.	No change
		This paragraph should be cross referenced with the section on Privacy and Spacing.	Page 6 Para 2.10	The SPD needs to be read as a whole. Cross referencing can reduce clarity and simplicity.	No change
		Children's play space - better clarity is needed between paras 2.12 & 2.13. The GLA policy should be adopted.	Page 6 Paras 2.12-13	The first paragraph describes Council policy and the second GLA policy. This is quite clear. The decision to adopt the SPG on Providing for Children's and Young People's play rests entirely with the GLA, not the Council. According to legislation the Council is not able to adopt GLA guidance.	No change
		Daylight and Sunlight. Proposed wording is vague. The wording should match Wandsworth's equivalent document.	Section 3	The Council considers the wording to be sufficiently clear. The Council will consider all daylight and sunlight matters in accordance with BRE standards and guidelines.	No change
		This section contains some sound advice but more figures should be given for contentious situations.	Section 4	The Council considers that it is more appropriate to be flexible and not be too prescriptive in looking at the difficult issue of privacy and spacing between buildings.	No change
		SPD should specify minimum distances between windows for further investigation or guidance. See BRE study.	Section 4	The Council considers that it is more appropriate to be flexible and not be too prescriptive in looking at the difficult issue of privacy and spacing between buildings.	No change
		Design led approach is good but is limited by using Dept' of Transport guidance that concentrates on road safety. The rear of buildings and gardens are outside the scope of a street design manual.	Section 4	The Council adheres to the design led approach. Whilst the Department of Transport publication has been mentioned in the SPD it does not mean that the Council is restricted by or just to using this particular publication.	No change
		Principle of balconies and terraces	Section 4	In looking at the provision of balconies or terraces	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		welcomed but not to the detriment of neighbours. Further clarity needed about the extent of the adding of new windows and balconies.		one of the Council's prime considerations is always what effect these may have on the amenities of surrounding residential occupiers.	
		Welcomes reconfiguration or deconversion of existing inadequate conversions to match current needs and standards.	Section 5	Noted.	No change
		Space standards for individual rooms is the most effective way of ensuring adequate space rather than overall floor areas. Original rooms should be retained where possible.	Section 5	Not accepted. Overall floorspace of dwellings provides the context within which different rooms can be arranged.	No change
		Para 5.6: Floorspace threshold is inconsistent with the overall floor areas set out in para 1.12, Fig 2. Deleting overall dwelling sizes would remove the contradiction.	Page 10 Para 5.6	There is no inconsistency between the two figures. The 120 square metre figure set out in Policy 17 of the UDP is meant to act as a threshold between those dwellings which can be considered for conversion and those that can not. The figures set out in Figure 2 set out the minimum room sizes that the Council will be seeking in new dwellings and conversions.	No change
		Para 5.7: Original Floor area. It's difficult to establish original configuration of houses back in 1948. Danger of over-sized and unpopular houses remaining neglected causing more problems than re-intensification from proper conversions.	Para 5.7	Noted. However, it is felt that using the original floor area gives the Council the best starting point for considering whether a house is big enough to be converted into flats.	No change
		Concerned about the addition of extensions under PD which are then converted.	Section 5	Noted. This is why Policy 17 of the UDP states that only dwellings with an original pre-1948 un-extended floor area of 120 square metres will be considered for conversion.	No change
		Conversion potential could be better	Section 5	Noted. However the Council believes that the	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		assessed under the basis of extensions completed more than 10 years ago.		original floor area is still the best starting point.	
		Para refers to the symptoms of over-intensification but should also include references to any other specific guidance.	Page 11 Para 5.11	Noted. However there is no other specific guidance to refer to.	No change
		Requirements for refuse storage do not seem to be joined up with other guidance.	Section 5	Noted. There is no other relevant guidance for this.	No change
		Concept of a range of units with garden access for a family sized dwelling is broadly supported, but reference to overall dwelling sizes is not supported. We should return to the Parker-Morris Standard.	Para 5.14	Noted Also see Annexe to Appendix 1 (2)	No change
		Para 5.15 and following on noise insulation is supported.	Para 5.15	Noted.	No change
		Para 5.20: Retention of original window & dormer framing patterns on street elevations should be included. Less concerned about rear elevations.	Page 12 Para 5.20	This suggestion goes beyond the scope of this SPD.	No change
		Para 5.21: Agree that hardstandings should be permeable, but should be explained why. Para should be grouped with 5.24 & 5.25.	Page 12 Para 5.21	Accept. Reference will be added to the need to retain greenery to aid absorption of surface water run off.	Amend end of the 2nd sentence of para 5.20 to: “as the removal of all greenery can detract from an area’s appearance and significantly reduce its ability to absorb heavy rainfall. The parking surface used should be permeable to allow surface water to be absorbed into the ground.”
		Rear Gardens. Requirement should	Para 5.27	Policy 17 is part of the adopted UDP for Lambeth and	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		be deleted as it is incompatible with Section 2. Family sized units should have dedicated garden space. Family units should have the garden space whilst allowing the basement unit some space also. Practicality of communal gardens depends on number & mix of dwellings and if balcony, terrace or patios are available.		so cannot be deleted. Given the constraints in most house conversions the approach to the use of gardens is considered to be the most realistic and therefore appropriate given the circumstances in most cases.	
		Broadly supported but para 6.3 and 5.15 should be more closely aligned because they address the same issue of stacking.	Paras 5.15 and 6.3	Noted. Both address the issue of handing and stacking and describe similar considerations. However, Section 5 deals with house conversions and Section 6 with additional floors on existing buildings.	No change
		Concept of Lifetime Homes needs to be interpreted more broadly than just for wheelchair users because of trend of homeowners to adapt properties rather than just moving home.	Section 7	Noted. However, the SPD is in accord with the GLA policy on Lifetime Homes, which focuses on physical mobility issues.	No change
134	Lisa Henry	Questionnaire			
		Minimum living space standards should be set for developers.	General	Noted. The SPD does this.	No change
135	Charles White	Questionnaire	-	-	-
136	Joan Grant	Questionnaire	-	-	-
137	Moyra Heggie	Questionnaire	-	-	-
138	Hannah McPaul	Questionnaire			
		Room standards are only just adequate and should not be allowed to go any lower.	Section 1 & 5	Noted.	No change
		Developments should be monitored.	General	Noted and agreed.	No change
139	MrEdward & Ms Eleanor Lewis	Questionnaire			
		Concern over back garden	General	Policy 38 of the UDP addresses this.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		developments.			
		Will the SPD be able to control unauthorised developments?	General	The SPD sets out clear guidelines for future housing developments in the Borough. It will be a material consideration in the determination of planning applications in the future. Any development that is unauthorised is liable to enforcement action and compliance with the policies in the UDP and the SPD.	No change
140	Kathleen Beegan	Questionnaire			
		Concern about overcrowding.	General	Noted. The space standards in the SPD aim to bring about better quality housing developments in the Borough and the prevention of poor space standards which can lead to overcrowding.	No change
		Developers have already converted many houses in the area.	General	UDP Policy 17 sets out the circumstances in which the Council considers the conversion of houses is acceptable and the SPD provides guidance on space standards and the type of flat conversion activity which occurs in the Borough in the future.	No change
141	Brendan Grennan	Questionnaire			
		Hopes the SPD will better control development in Streatham.	General	The replacement UDP was adopted in August 2007 and its policies including that on house conversions have therefore only recently had the full weight of this status. The SPD will enable the Council to better guide the quality of housing development and housing conversions in Streatham.	No change
		Concern for building in back gardens without permission.	General	This is addressed by Policy 38 of the UDP in instances where planning permission is required. However, planning regulations allow householders to erect non habitable buildings or structures in their back garden without permission subject to certain size and siting limits for their own use.	No change
142	Katerina Saputo	Questionnaire			
		These guidelines are needed to control building in Lambeth.	General	Noted.	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
		Gardens and green spaces should be better protected.	General	The Council's UDP has a very strong policy on the protection of open spaces in the Borough.	No change
143	Maureen Vourath	Questionnaire			
		There are too many house conversions and too much building in gardens. It is hoped that the SPD will stop or improve the situation.	General	Noted. The SPD is being introduced not to prevent conversions taking place in the Borough but to ensure that the quality of conversions taking place is appropriate.	No change
144	Dr Susna Koshy	Questionnaire			
		Inspectors should check building works.	Section 3	Noted. Building works are subject to inspections under Building Regulations.	No change
		The design led approach is not rigid enough to ensure adequate and appropriate building.	Section 4	Noted. However, the design led approach allows flexibility and innovative solutions. Physical standards would be too rigid and not deal with all circumstances.	No change
		Backland development will cause loss of amenity space, daylight and privacy to neighbours.	Section 5	This is addressed by Policy 38 of the UDP in instances where planning permission is required. However, planning regulations allow householders to erect non-habitable buildings or structures in their back garden without permission subject to certain size and siting limits for their own use.	No change
		Floor insulation has to be specified.	Section 6a	This is the responsibility of Government set Building Regulations.	No change
		Recent developments in the area have paid no thought to good design.	Section 6b	The SPD has been introduced to provide guidance on the quality of housing developments in the Borough.	No change
145	Philip Koshy	Questionnaire			
		Concern about development in back gardens	Sections 3 & 4	This is addressed by Policy 38 of the UDP in instances where planning permission is required. However, planning regulations allow householders to erect non-habitable buildings or structures in their back garden without permission subject to certain size and siting limits for their own use.	No change
146	John Burrows	Questionnaire	-	-	-
147	Cllr Julian	The size threshold of 120 square	General	The size threshold set out in Policy 17(a) of the	No change

Ref.	Consultee	Comments/objections	Page no. Para no.	Council response	Proposed change
	Heather	metres in Policy 17(a) of the UDP is too low as it is allowing too many single family dwellings to be converted into flats. The figure should be raised to 200 square metres.		adopted UDP can not be changed. To attempt to introduce a new size threshold into the SPD would contravene the purpose of supplementary planning documents which should only elaborate and give further guidance on existing policy in the adopted development plan. The SPD can not introduce new policy.	
		The Council should resist all developments which propose additional floors on existing buildings of purpose built flats.	Section 6	This would require a change in UDP policy. UDP policy and the SPD set out the main considerations to be addressed in applications of this nature.	No change
		Support the slight increase in room sizes as proposed in the SPD.		Noted.	

Annexe to Appendix 1: Detailed response to representations on the ban on studio flats, floorspace guidance and impact on housing supply

1. Ban on studio flats and impact on housing supply

Response to: - RPS for Haywoods Group, James Laurence Group and Razor Investments, Peter Pendleton & Associates Ltd, Bromley Renovations, Emery Planning Partnership, GLA, Elizabeth Jones.

These respondents objected to the Council's approach to studio flats in conversion properties. Overall, comments stated that studio accommodation can provide a beneficial and affordable source of accommodation and that a blanket prohibition on studio flats could inhibit conversion activity and thereby affect the supply of new housing in Lambeth.

As stated in Policy 17(c) of the UDP, the Council is concerned to ensure that the conversion of existing dwellings does not lead to an over intensification of use which can give rise to harmful effects on residential amenity and the quality of living accommodation provided. The smaller the size of flats the greater the number is the number of flats that can be fitted into any given property. The more flats there are in any given property, the more intensive is the use. It is important to bear in mind that most houses that are the subject of planning applications for conversion were only originally intended and designed for accommodation by a single household. However, the Council's intention is not to ban any particular form of accommodation but to ensure that all accommodation is of an appropriate quality and size to ensure that it does not overdevelop the capacity of existing buildings and result in unacceptable over intensive development.

The Council has carried out a detailed re-assessment of housing supply which also considers the contribution of studio flats to housing provision. This analysis clearly demonstrates that studio flats have made a minimal contribution to housing supply in Lambeth over the past two years. Furthermore, it is clear from the housing supply already identified at the outset of the 10 year London Plan monitoring period that the contribution of studio flats will not have a significant bearing on the Council's ability to meet the London Plan target.

The Alterations to the London Plan (December 2006) set a minimum target for Lambeth of 11,000 additional dwellings for the period 2007/08 to 2016/17 (1,100 additional dwellings per year). As at 1 April 2007 there were 6,799 additional dwellings under construction in Lambeth, with unimplemented permission, or that had been approved and were subject to Section 106 Agreement being concluded. This already equates to over 6 years housing supply and does not include the future contribution of non conventional housing (long term vacant properties brought into use and household spaces in new non-self contained accommodation), nor that of allocated sites which have not yet come forward with planning permission.

In 2006/07 planning permission was granted for 22 studio flats, which equates to 0.32% of the gross total number of units approved in Lambeth. In 2006/07 16 studio flats were completed. This comprised 1.13% of the total number of units completed in Lambeth. In the previous year (2005/06) 8 studio flats were completed. This amounted to 0.48% of the gross total number of units completed in Lambeth.

Notwithstanding the above, in the light of the representations received the Council proposes to delete the reference to studio flats not being acceptable in converted properties at paragraph 5.14 of the SPD as the SPD does not preclude the provision of studio flats. It seeks to make clear that new development is of an appropriate quality in terms of space in accordance with Policy 17 on conversions.

2. Use of floorspace standards and impact on housing supply

Response to: - Eric Sames, ESAPS Ltd, Tim de Vere Green, Fresh London, Richard Woollard, Woollard Smith & Associates Ltd, RPS for Haywoods Group, James Laurence Group and Razor Investments, Peter Pendleton & Associates Ltd

RPS For Fairview New Homes Ltd, Notting Hill Housing, DP9 Planning Consultants for Native Land, Chris Rodger, South Circular Developments Ltd, Bromley Renovations, Kennington Association, Home Builders Federation, Emery Planning Partnership, GLA, Elizabeth Jones, Barton Wilmore (on behalf of Berkeley Group)

Paul Kleinman, Montagu Evans (on behalf of Ludgate Land Ltd), Alan Piper, Brixton Society.

These objections related to the use of space standards and minimum room sizes proposed both in new developments and conversions, largely in relation to the effects on housing capacity / supply and the affordability of new dwellings.

The use of floorspace guidance is well established, legitimate and in accordance with national and regional planning policies. The Council considers that it is necessary and appropriate for the SPD, in its explanation and interpretation of the application of Policy 17 (flat conversions) of the adopted UDP, to include guidance on floorspace standards to ensure the policy is applied in a clear and consistent manner. The Council also considers that guidance on minimum acceptable internal floor areas is required to ensure that new homes are sustainable and function appropriately having regard to their intended levels of occupancy.

Policy 17 was subject to detailed scrutiny in the adoption process. This confirms that in its adopted form it is in accordance with national and regional (London Plan) policy as it was not called in by the Government Office for London. It was judged to be in general conformity with the London Plan as there were no objections/representations on this basis from the GLA, nor was the UDP subject to judicial review in the six week post-adoption High Court challenge period.

The floorspace standards for flats and rooms set out in the SPD are consistent with the standards being applied by other London boroughs, the standards proposed in the Housing Space Standards report prepared for the GLA (HATC report on Housing Space Standards August 2006), and the mandatory internal space standards introduced by English Partnerships in November 2007.

It is not considered that the introduction of minimum dwelling sizes and internal space standards set out in the SPD will have a significant impact on the numbers of new units coming forward through conversions. A study by HATC commissioned by the GLA and completed in August 2006 concluded that it is unclear whether space standards will have any effect at all on housing capacity, and if they do it is likely to be marginal. The standards are intended to ensure that the development of dwellings is not of such low space standards that there is significant concern about their long-term sustainability and suitability for the designed level of occupancy. This approach appears to be very much in line with the direction being taken by English Partnerships and the Mayor in his proposal to prepare Parker Morris space standards for housing in the 21st century. On this basis the Council has every confidence that the minimum London Plan target for additional dwellings will be readily met. The Council will continue to monitor housing completions in line with the plan, monitor and manage approach to housing provision.

3. Use of floorspace standards to ensure housing development is of sufficient quality

While the delivery of new homes in the UK and in London is a key government priority, increasing supply must be matched by high quality design and construction. As stated above, the Council's intention is to ensure that all accommodation is of an appropriate quality and size to ensure that it does not overdevelop the capacity of existing buildings or result in inadequate and unsustainable living accommodation.

Support for delivering quality places through good design exists at the national level. Planning Policy Statement 1 affirms the role of local authorities as facilitating and promoting the implementation of good quality development, which is a key element in achieving sustainable development. PPS3 prioritises high quality housing that is well-designed and built to a high standard as a key outcome that the planning system should deliver. An important aspect of good design is ensuring that internal space is adequate to create a suitable and sustainable living environment for occupants. PPS3 stresses that successful intensification of urban areas need not mean low quality accommodation with inappropriate space.

Specific floorspace standards are required in order for the policies to be understood and clearly and consistently applied. In the case of Policy 17 – house conversions this is particularly relevant in respect of the following parts of the policy:

- Size of house for conversion (17(a));
- The mix of units (17(c));
- Satisfactory size and layout (17(c));
- Acceptable standard of accommodation to future residents (17(d)); and
- Rooms should be of appropriate size (17(d)(vi)).

The HATC study commissioned by the GLA identifies a trend towards falling space standards, while London Plan Policy 3A.6 (Quality of new housing provision) recognises that changing lifestyles are making new demands upon the way residents use their homes with greater demands for internal space, including working from home and leisure activities. The supporting text goes on to state that new housing development should reflect these changes.

English Partnerships policy guidance (Delivering Quality Places, Nov 2007) sets out minimum internal space standards necessary “to achieve dwellings of a good standard that are flexible and adaptable and fit for purpose”. As stated above, the floorspace standards set out in the SPD are actually lower than English Partnerships’ mandatory standards.

The Council recognises that the conversion of existing dwellings can provide an important source of new housing but wants to ensure this does not result in low quality housing with inappropriate space. In line with the principles of sustainable development and guidance set out in Planning Policy Statements 1 and 3, the SPD seeks to prevent over intensive development and inadequate standards of living accommodation both in new developments and converted properties.

Conclusion

In conclusion, the Council considers that the use of internal space standards is necessary and justified by the requirements of Policy 17; the approach does not conflict with national or regional policy, and; that the standards are in line with those applied by other London boroughs and those proposed by English Partnerships and are therefore reasonable. Further, the re-assessment of housing supply showing that studio flats make an insignificant contribution to supply, together with the conclusions of the HATC study, indicate that the introduction of space standards would not have a significant impact on housing capacity or the Council’s ability to meet the London Plan housing provision target, which is already at a considerably advanced stage with over six years housing supply already identified.