

Proposed Submission Version

January 2020

Topic Paper 2:

Review of Policy on Small Housing Sites

January 2020


Lambeth

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1. Executive summary

The Draft London Plan Intend to Publish version 2019 sets out Lambeth’s new housing requirement, which includes a sub-target for development on small sites. Of a total requirement of 1,335 net additional dwellings per annum, 400 are expected to be delivered on sites under 0.25 ha in size (although this proportion can vary year on year).

Policy H2 part A of the Draft London Plan sets out ways in which boroughs should increase housing delivery on small sites, including pro-actively supporting well-designed new homes on small sites; diversifying the sources, locations, type and mix of housing supply; and bringing forward design code guidance.

The Draft London Plan considers that the areas most suitable for increasing housing delivery on small sites are those within 800m of a town centre boundary or a rail/tube station, or with a PTAL rating of 3 or above. There are few locations in Lambeth that do not fall into a least one of these categories.

Analysis of the record of housing delivery on small sites over the past ten years demonstrates Lambeth has a strong track record. However, the role of small sites will be increasingly important in future years given there is not an infinite supply of larger sites in the borough. Therefore it is necessary to explore options for increasing housing delivery of this type of site, whilst achieving the right balance to ensure quality of housing, residential amenity and access to high quality external amenity space. The approach also needs to be sensitive to the character of the borough, enabling a very gradual and incremental evolution in some locations rather than wholesale transformation.

This topic paper draws on evidence and consultation responses to consider the following potential policy options:

1. Changing the approach to managing residential conversions and de-conversions
2. Changing the approach to managing extensions
3. Changing the approach to managing development within the curtilage of an existing dwelling (e.g. on garden land)
4. Reducing residential external amenity space standards to increase densities

The outcome is a proposal, reflected in the policies in the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020, to adjust the policy approach for residential conversions and de-conversions, and for development within the curtilage of an existing dwelling. The overall policy approach to extensions is proposed to remain largely unchanged. Existing external amenity space standards for new houses are also proposed to be retained, but some changes are proposed for flatted developments and non-self-contained accommodation to improve deliverability and reflect changing circumstances.

These policies will be supported by positive design guidance in the form of a Design Code SPD. This will support implementation of revised Local Plan policies to ensure good design outcomes. The Design Code SPD will be available in draft for public consultation in February 2020.

2. Introduction

This topic paper explores housing delivery on small sites in Lambeth, and ways in which the Revised Lambeth Local Plan can respond to Draft London Plan Policy H2. It examines housing delivery on small sites in Lambeth since 2008. Sites of less than 0.25ha, and schemes of 1-25 units are looked at separately. The paper also looks at specific development types common on small housing sites: conversion of existing dwellings, new units created through extensions, and redevelopment of existing residential dwellings at higher densities.

The topic paper goes on to consider policy options for increasing housing delivery on small sites. This includes consideration of the policy approach to residential conversions, extensions, building within the curtilage of existing dwellings, and external amenity space requirements. Based on this analysis, it provides a justification for the proposed policy approach in the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV).

3. Draft London Plan Policy on Small Sites

3.1 Draft London Plan - Policy H2

Policy H2 of the Draft London Plan Intend to Publish version December 2019 aims to increase the role that small sites play in housing delivery. Small sites are defined as those smaller than 0.25 hectares in size. Part A of policy H2 details the ways in which small sites can deliver more housing, stating that boroughs should:

- pro-actively support well-designed new homes on small sites in order to significantly increase the contribution of small sites to meeting London’s housing needs;
- diversify the sources, locations, type and mix of housing supply;
- support small and medium-sized house builders and to support those wishing to bring forward custom, self-build and community-led housing, and
- achieve the small sites target (see section 3.2 below)

Part B sets out that boroughs should, where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites.

3.2 Small Sites Sub-Target

The Draft London Plan Intend to Publish Version (DLP) sets out Lambeth’s new borough-level housing target from 2019/20, which is 1,335 net additional dwellings per annum (dpa). For the first time, this target includes a ‘sub-target’ for development on small sites. Of the 1,335 dpa, 400 net additional dwellings per annum are expected to be delivered on small sites, with the rest either conventional housing on large sites (0.25ha or more), or non-self-contained dwellings. However, DLP explains that this ‘sub-target’ is an indication of estimated capacity, and that the relative contribution from large and small sites can fluctuate from year to year.

The borough-level housing targets are based on the evidence of housing capacity in the Mayor’s London-wide Strategic Housing Land Availability Assessment (SHLAA) 2017. One element of this involved a high-level site-by-site assessment of large sites with an area of 0.25ha or more. The small sites element was calculated through a combination of two methods - a modelled figure to estimate potential housing capacity from the densification of existing housing stock, and a windfall figure based on past trends.

The GLA produced a model to estimate densification from infill development, residential conversions and extensions. This was applied to existing housing within certain locations: those with a PTAL rating of 3-6, or within 800m of a tube station, rail station or town centre boundary. Following the outcome of the Draft London Plan examination, the model assumes that 0.3% of existing houses in these areas will be densified each year. The model assumes a ‘densification factor’ of 2.2 for detached and semi-detached houses and 1.3 for terraced housing. Different assumptions are used for conservation areas.

For other locations, and for other types of small site development, a windfall figure was used. This was based on annual trends of completions on sites under 0.25ha between 2008/09 and 2015/16. It included change of use (but not office-to-residential permitted development) and new build

schemes with more than 10 units. It excluded residential conversions and new build developments smaller than 10 units to avoid double counting.

For Lambeth, the modelled figure and the windfall figure total 4,000 net additional units for the period of 2019/20 to 2029/30, or 400 units per annum.

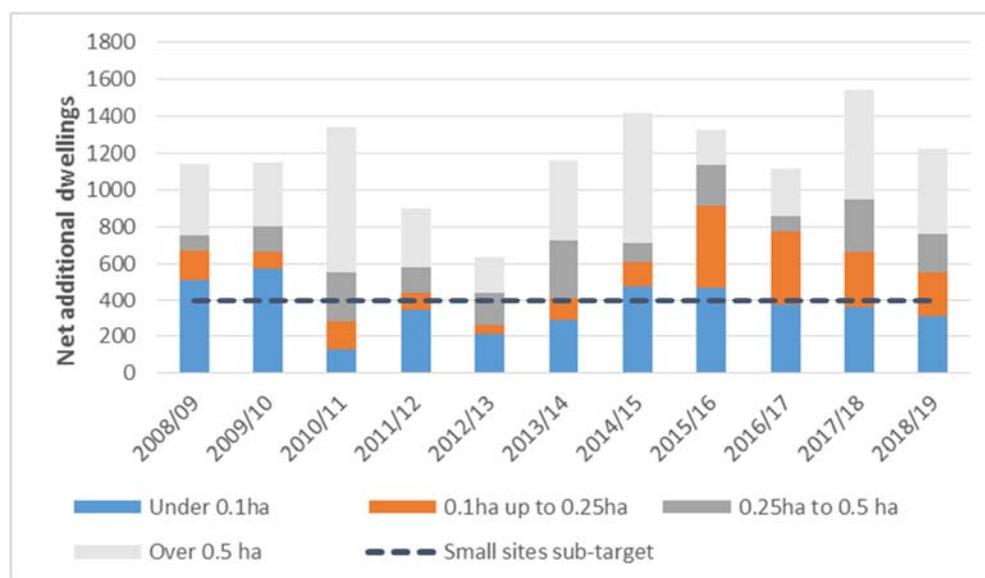
4. Housing delivery on small sites in Lambeth

This section assesses the record of housing development on small sites in Lambeth over the period 2008-2019. This is considered by both size of site and size of scheme, with completions and approvals looked at separately. As well as the overall number of units completed on small sites, there is an analysis of the types of development completed on small sites (e.g. change of use, conversion and new build development). This analysis looks at conventional self-contained dwellings only, it does not include non-self-contained dwellings such as hostels or student accommodation.

4.1 Completions by size of site

Chart 1 shows the number of units completed in Lambeth between 2008 and 2019 by the size of the site. As shown in Table 1 below, on average, 570 units were completed each year on sites under 0.25 ha, equating to 36% of all units completed. However, this figure varies widely from year to year between 263 to 912 units, or 18% to 48% of all units completed.

Chart 1 – Completions 2008-2019 by site area



As set out in table 1, completions on sites under 0.25 ha made up an average of 48% of all completed conventional units, or 36% of the total annual monitoring figure¹

¹ The annual monitoring figure is used to measure performance against the housing target set out in the London Plan, most recently the London Plan 2016 (consolidated with alterations since 2011). This comprises conventional and non-conventional housing supply; non-conventional supply includes non-self-contained dwellings (such as student accommodation) and vacant private dwellings brought back into use.

Table 1 – Units completed in Lambeth (2008-2019) by size of site

Financial Year	Under 0.1 ha		Under 0.25 ha		Under 0.5ha		All Sites	
	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	Net Additional Conventional Dwellings Completed	Net additional dwellings completed including non-conventional units (annual monitoring total)
2008/09	515	45% (36%)	675	59% (48%)	757	66% (54%)	1,146	1,412
2009/10	573	50% (38%)	664	57% (45%)	805	70% (54%)	1,155	1,489
2010/11	130	10% (8%)	284	21% (18%)	557	42% (35%)	1,337	1,602
2011/12	348	39% (38%)	445	49% (49%)	580	64% (64%)	901	912
2012/13	212	33% (29%)	263	41% (36%)	441	69% (61%)	638	725
2013/14	292	25% (20%)	416	36% (29%)	731	63% (51%)	1,158	1,431
2014/15	475	34% (27%)	609	43% (34%)	717	51% (40%)	1,417	1,788
2015/16	473	36% (19%)	912	69% (36%)	1141	86% (%)	1,329	2,505
2016/17	373	33% (26%)	776	69% (54%)	857	77% (59%)	1,119	1,445
2017/18	360	23% (23%)	668	43% (42%)	948	61% (60%)	1,544	1,574

Financial Year	Under 0.1 ha		Under 0.25 ha		Under 0.5ha		All Sites	
	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	No. units	% of Net Additional Conventional Dwellings Completed (% of monitoring total)	Net Additional Conventional Dwellings Completed	Net additional dwellings completed including non-conventional units (annual monitoring total)
2018/19	313	26% (14%)	554	45% (24%)	764	63% (33%)	1,219	2,288
Total	4,064	31% (24%)	6,266	48% (36%)	8,298	64% (48%)	12,963	17,171
Yearly Average (mean)	369	-	570	-	754	-	1,178	1,561

Chart 2 below sets out completions on small sites by the types of residential development. For this report, development types are defined as follows:

New Build Schemes where non-residential buildings or land have been replaced by a new scheme that includes residential. Also includes some small estate regeneration schemes.

Residential Densification Schemes where one or more existing residential dwellings have been replaced with a new scheme which provides an uplift in the number of dwellings.

Change of Use Schemes where existing buildings that have changed from a non-residential use to residential, and includes schemes delivered through Permitted Development for Office to Residential, which came into force in May 2013.

Conversions Conversion of single-family dwellings into multiple units, as well of other types of conversion of residential floorspace.

Extensions This includes units wholly contained within an extension of an existing building, such as where additional floors have been added.

As set out in Table 2 below, on sites of less than 0.25ha, an average of 44% of net additional conventional dwellings are delivered through new build, 26% through change of use and 20% through conversion of existing residential buildings. A smaller proportion were delivered through building on existing residential sites (5%) and extension (4%).

Chart 2 – Completions 2008-2019 on sites of less than 0.25 ha, by development type (net additional conventional dwellings)

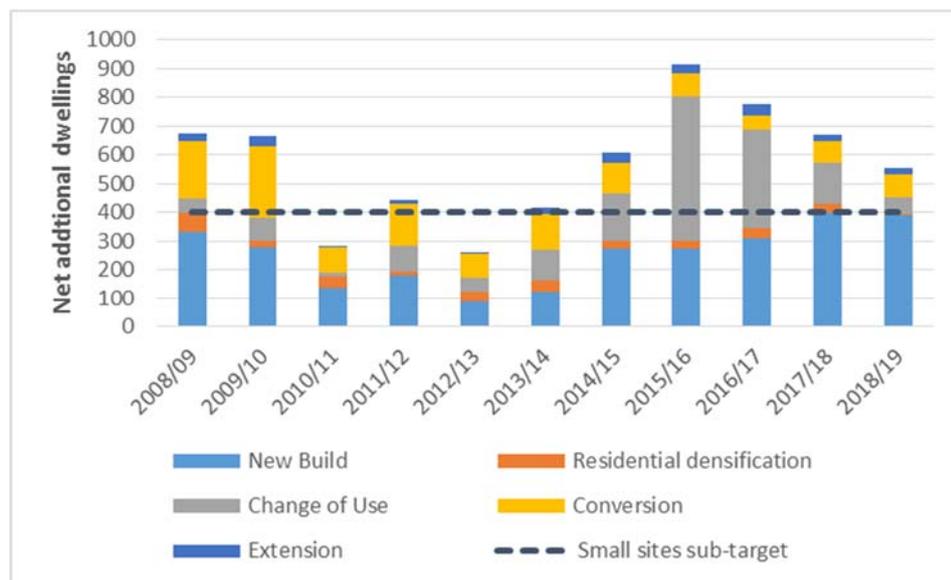


Table 2 – Completions on sites less than 0.25ha, by development type (net additional conventional dwellings)

Financial Year	New build		Residential Densification		Change of use		Conversion		Extension		Total	
	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%
2008/09	331	49%	68	10%	47	7%	202	30%	27	4%	675	100
2009/10	278	42%	21	3%	84	13%	246	37%	35	5%	664	100
2010/11	135	48%	41	14%	15	5%	87	31%	6	2%	284	100
2011/12	179	40%	16	4%	90	20%	143	32%	17	4%	445	100
2012/13	90	34%	33	13%	51	19%	82	31%	7	3%	263	100
2013/14	122	29%	43	10%	105	25%	126	30%	20	5%	416	100
2014/15	273	45%	26	4%	168	28%	104	17%	38	6%	609	100
2015/16	273	30%	29	3%	503	55%	79	9%	28	3%	912	100
2016/17	309	40%	35	5%	343	44%	50	6%	39	5%	776	100
2017/18	400	60%	28	4%	143	21%	75	11%	22	3%	668	100
2018/19	392	71%	2	0%	56	10%	83	15%	21	4%	554	100
Total	2,782	44%	342	5%	1,605	26%	1,277	20%	260	4%	6,266	100%
Yearly Average (mean)	253	-	31	-	146	-	116	-	24	-	570	-

4.2 Approvals by size of site

Chart 3 and Table 3 below show the number of units approved in Lambeth between 2008 and 2019 by the size of the site. On average, 615 units were approved on sites under 0.25 ha each year, equating to 35% of all net additional conventional dwellings approved. As with completions, this varies widely from year to year between 322 and 1,190 units, or 16% and 80% of all net additional conventional dwellings approved.

Chart 3 – Approvals 2008-2019 on sites less than 0.25ha (net additional conventional dwellings)

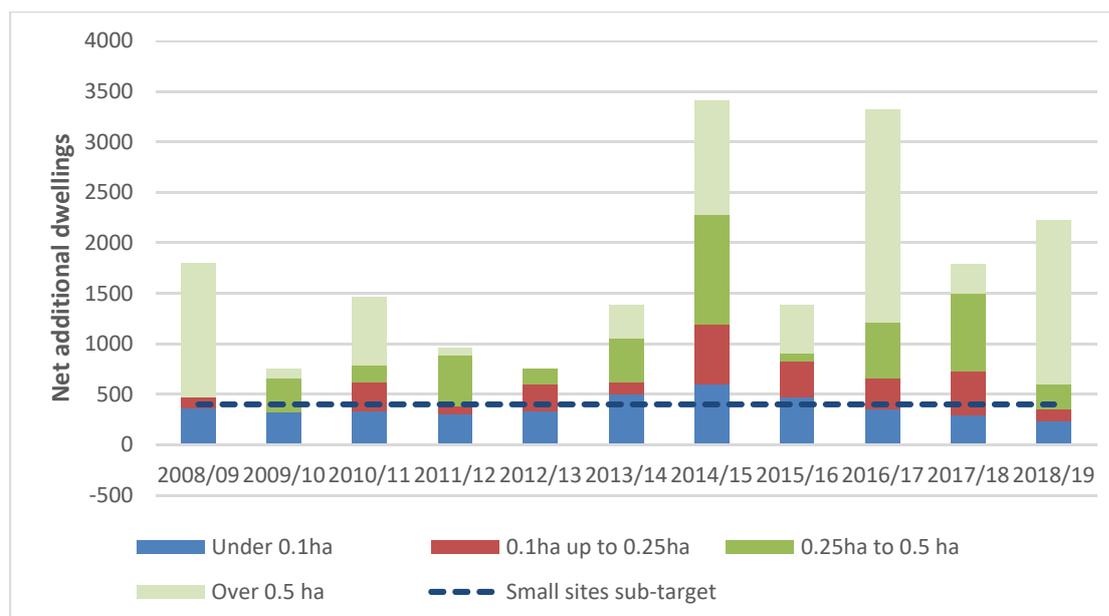


Table 3 – Units approved in Lambeth by size of site 2008-2019 on sites of 0.5ha or less (net additional conventional dwellings)

Financial Year	Under 0.1ha		Under 0.25ha		0.5ha or less		All sites	
	No. of units	%	No. of units	%	No. of units	%	No. of units	%
2008/09	357	20%	473	26%	473	26%	1,798	100%
2009/10	322	43%	322	43%	656	87%	753	100%
2010/11	331	23%	621	42%	785	53%	1,468	100%
2011/12	305	32%	381	40%	885	93%	955	100%
2012/13	333	45%	598	80%	747	100%	746	100%
2013/14	494	36%	622	45%	1,048	76%	1,380	100%
2014/15	604	18%	1,190	35%	2,277	67%	3,413	100%
2015/16	468	34%	826	60%	905	66%	1,379	100%
2016/17	356	11%	662	20%	1,209	36%	3,322	100%
2017/18	290	16%	723	40%	1,501	84%	1,794	100%
2018/19	237	11%	348	16%	602	27%	2,225	100%
Total	4,097	21%	6,766	35%	11,088	58%	19,233	100%
Yearly average	372	-	615	-	1,008	-	1,748	-

On sites of less than 0.25ha, an average of 42% of net additional conventional dwellings approved were new build, 30% were through change of use and 17% through conversion of existing residential buildings. A smaller proportion were delivered through building on existing residential sites (7%) and extension (4%).

Chart 4 – Approvals 2008-2019 on sites less than 0.25ha, by development type (net additional conventional dwellings)

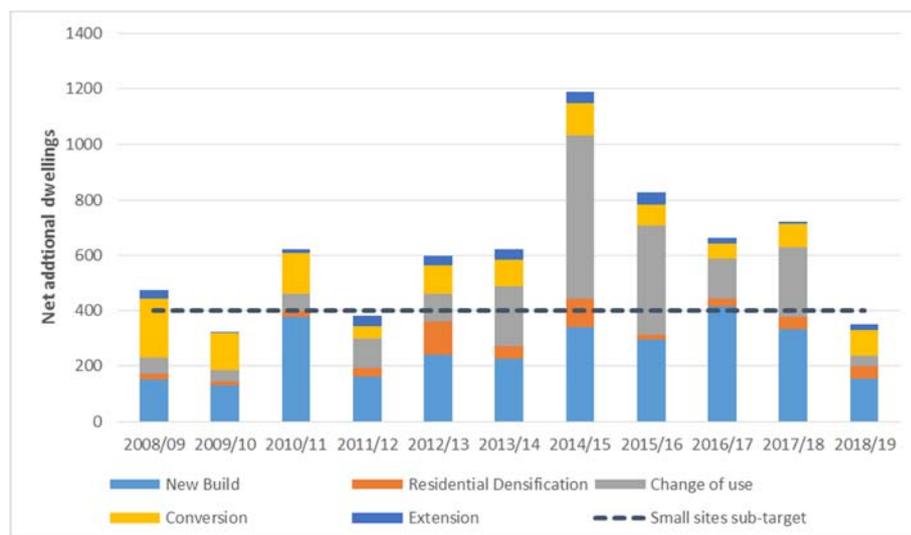


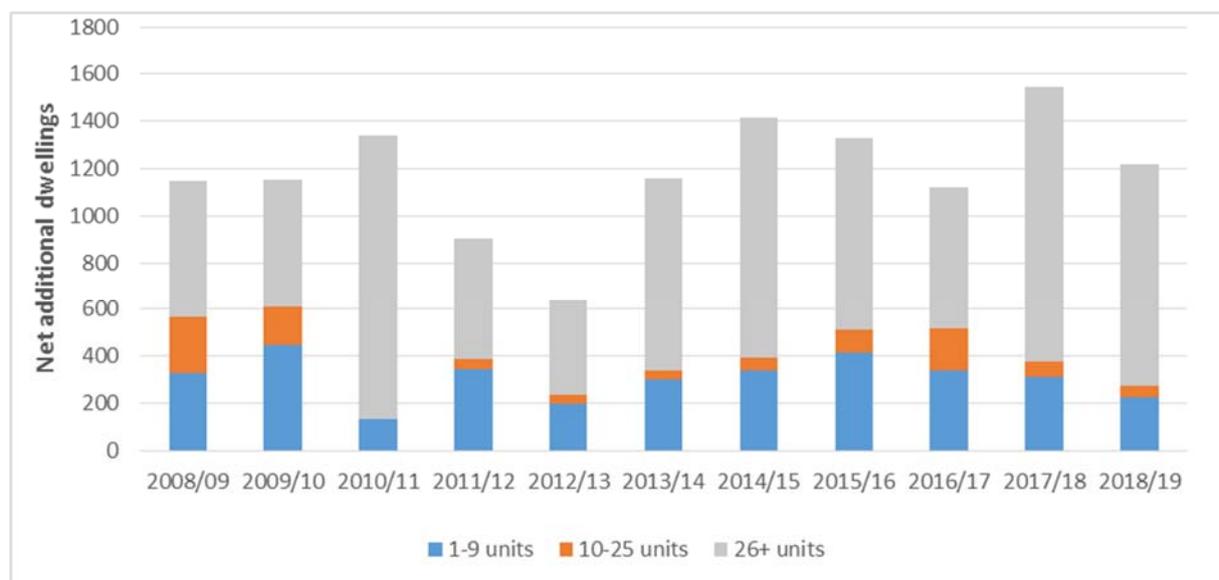
Table 4 – Approvals 2008-2019 on sites less than 0.25ha, by development type (net additional conventional dwellings)

Financial Year	New build		Residential Densification		Change of use		Conversion		Extension		Total	
	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%
2008/09	152	32%	21	4%	57	12%	211	45%	32	7%	473	100%
2009/10	132	41%	14	4%	41	13%	132	41%	3	1%	322	100%
2010/11	376	61%	21	3%	63	10%	149	24%	12	2%	621	100%
2011/12	163	43%	31	8%	103	27%	46	12%	38	10%	381	100%
2012/13	240	40%	119	20%	101	17%	103	17%	35	6%	598	100%
2013/14	226	36%	46	7%	213	34%	100	16%	37	6%	622	100%
2014/15	338	28%	105	9%	591	50%	113	9%	43	4%	1190	100%
2015/16	296	36%	16	2%	397	48%	75	9%	42	5%	826	100%
2016/17	416	63%	27	4%	144	22%	56	8%	19	3%	662	100%
2017/18	331	46%	47	7%	253	35%	85	12%	7	1%	723	100%
2018/19	156	45%	44	13%	38	11%	91	26%	19	5%	348	100%
Total	2,826	42%	491	7%	2,001	30%	1,161	17%	287	4%	6,766	100%
Yearly average (mean)	257	-	45	-	182	-	106	-	26	-	615	-

4.3 Completions by size of scheme

Chart 5 shows the number of net additional conventional dwellings completed in Lambeth between 2008 and 2019 by the size of the scheme (in units). On average, 394 net additional conventional dwellings were completed per annum on schemes with 1-25 units. This figure varies widely from year to year between 131 and 608 dwellings.

Chart 5 – Completions 2008-2019 by scheme size - net additional conventional dwellings



As set out in table 5, completions on sites with 1-25 units made up an average of 33% of all completed conventional units, or 25% of the total annual monitoring figure (which takes into account non-conventional housing supply).

Table 5 – Completions in Lambeth by size of scheme 2008-2019 (net additional conventional dwellings)

Financial Year	1-9 units			1-25 units			Net additional Conventional Dwellings Completed	Net additional dwellings including non-conventional units (monitoring total)
	Number of units	% of Net Additional Conventional Dwellings Completed	% of monitoring total	Number of units	% of Net Additional Conventional Dwellings Completed	% of monitoring total		
2008/09	330	29%	23%	567	49%	40%	1,146	1,412
2009/10	447	39%	30%	608	53%	41%	1,155	1,489
2010/11	131	10%	8%	131	10%	8%	1,337	1,602
2011/12	344	38%	38%	388	43%	43%	901	912
2012/13	196	31%	27%	236	37%	33%	638	725

Financial Year	1-9 units			1-25 units			Net additional Conventional Dwellings Completed	Net additional dwellings including non-conventional units (monitoring total)
	Number of units	% of Net Additional Conventional Dwellings Completed	% of monitoring total	Number of units	% of Net Additional Conventional Dwellings Completed	% of monitoring total		
2013/14	301	26%	21%	336	29%	23%	1,158	1,431
2014/15	337	24%	19%	391	28%	22%	1,417	1,788
2015/16	415	31%	17%	513	39%	20%	1,329	2,505
2016/17	339	30%	23%	520	46%	36%	1,119	1,445
2017/18	309	20%	20%	376	24%	24%	1,544	1,574
2018/19	224	18%	10%	271	22%	12%	1,219	2,288
Total	3,373	26%	20%	4,337	33%	25%	12,963	17,171
Yearly Average	307	-	-	394	-	-	1,178	1,561

Chart 6 and table 6 set out completions by development type on schemes comprising 1-25 units. An average of 32% of net additional conventional dwellings completed are new build, 27% are delivered through change of use and 29% through the conversion of existing residential buildings. A smaller proportion are completed through building on existing residential sites (7%) and extensions (6%).

Chart 6 – Completions 2008-2019 on schemes with 1-25 units, by development type (net additional conventional dwellings)

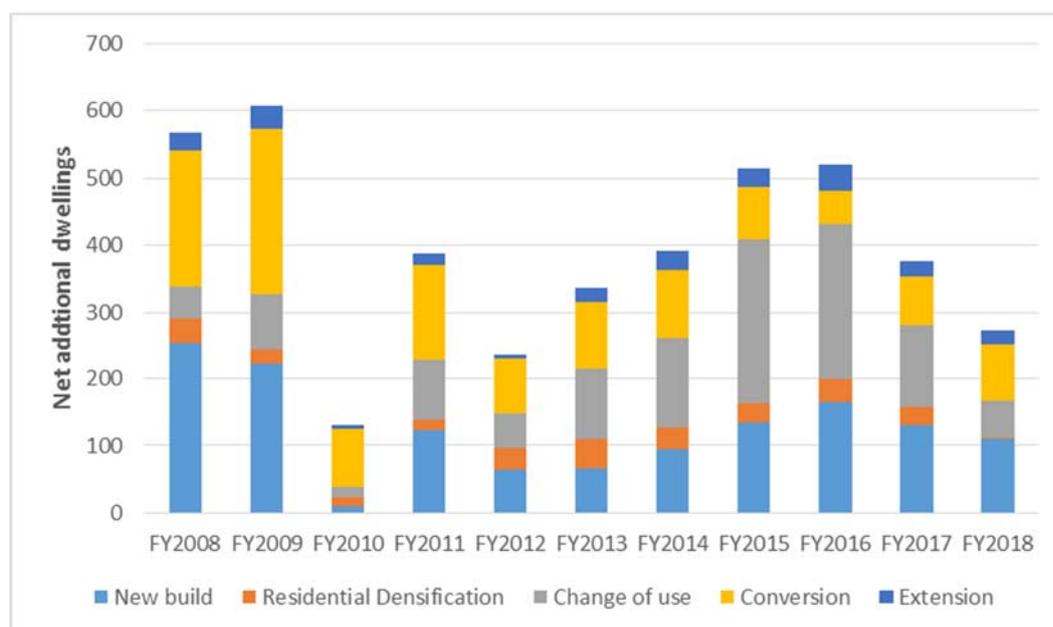


Table 6 – Completions in Lambeth 2008/09 to 2018/19 on schemes with 1-25 units, by development type (net additional conventional dwellings)

Financial Year	New build		Residential Densification		Change of use		Conversion		Extension		Total	
	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%
2008/09	252	44%	39	7%	47	8%	202	36%	27	5%	567	100
2009/10	222	37%	21	3%	84	14%	246	40%	35	6%	608	100
2010/11	10	8%	13	10%	15	11%	87	66%	6	5%	131	100
2011/12	122	31%	16	4%	90	23%	143	37%	17	4%	388	100
2012/13	63	27%	33	14%	51	22%	82	35%	7	3%	236	100
2013/14	66	20%	43	13%	105	31%	102	30%	20	6%	336	100
2014/15	94	24%	33	8%	133	34%	104	27%	27	7%	391	100
2015/16	134	26%	29	6%	245	48%	79	15%	26	5%	513	100
2016/17	165	32%	35	7%	231	44%	50	10%	39	8%	520	100
2017/18	130	35%	27	7%	122	32%	75	20%	22	6%	376	100
2018/19	109	40%	2	1%	56	21%	83	31%	21	8%	271	100
Total	1,367	32%	291	7%	1,179	27%	1,253	29%	247	6%	4,337	100%
Yearly Average (mean)	124	-	26	-	107	-	114	-	22	-	387	-

4.4 Approvals by size of scheme

Chart 7 and Table 7 below show the number of net additional conventional dwellings approved in Lambeth between 2008 and 2019 by the size of the scheme. On average, 419 net additional conventional dwellings were approved on sites with 1-25 units each year, equating to 24% of all those approved.

Chart 7 – Approvals 2008-2018 by scheme size (net additional conventional dwellings)

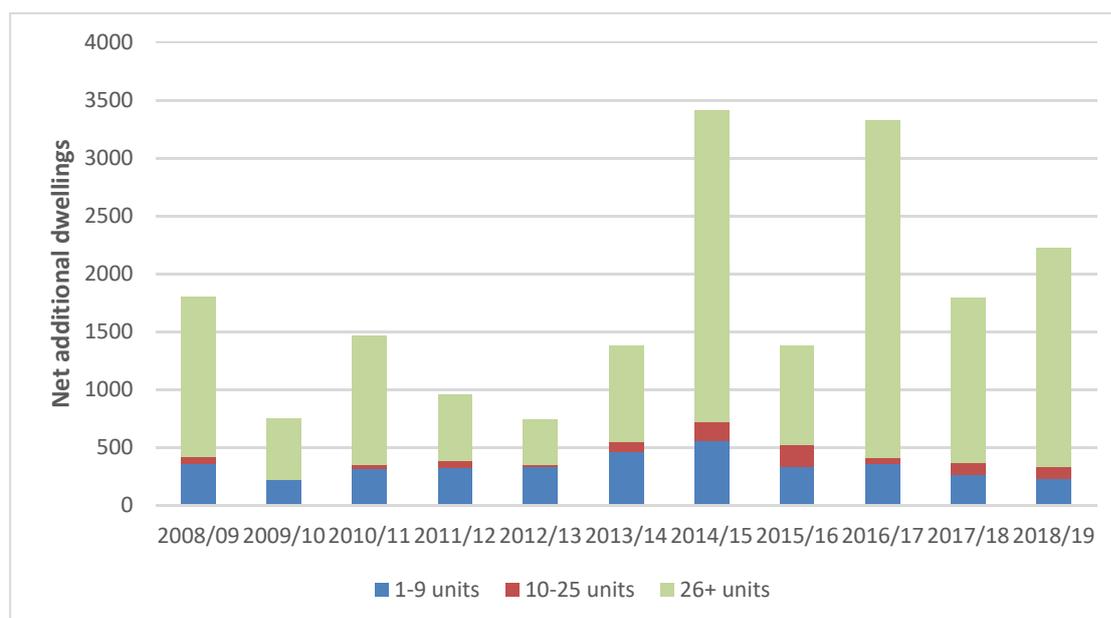


Table 7 – Approvals 2008-2019 sites with 1- 25 units (net additional conventional dwellings)

Financial Year	1-9 units		1-25 units		Total	
	Number of units	%	Number of units	%	Number of units	%
2008/09	361	20%	416	23%	1,798	100%
2009/10	221	29%	221	29%	753	100%
2010/11	317	22%	354	24%	1,468	100%
2011/12	322	34%	380	40%	955	100%
2012/13	332	45%	351	47%	746	100%
2013/14	462	33%	544	39%	1,380	100%
2014/15	554	16%	722	21%	3,413	100%
2015/16	328	24%	520	38%	1,379	100%
2016/17	356	11%	407	12%	3,322	100%
2017/18	260	14%	366	20%	1,794	100%
2018/19	233	10%	330	15%	2,225	100%
Total	3746	19%	4611	24%	19,233	100%
Yearly average	341	-	419	-	1,748	100%

Chart 8 and Table 8 set out approvals by development type on schemes comprising 1-25 units. An average of 30% of net additional conventional dwellings approved are new build, 31% are delivered through change of use and 25% through conversion of existing residential buildings. A smaller proportion are completed through building on existing residential sites and extensions (both 7%).

Chart 8 – Approvals 2008-2017 on sites with 1-25 units, by development type (net additional conventional dwellings)

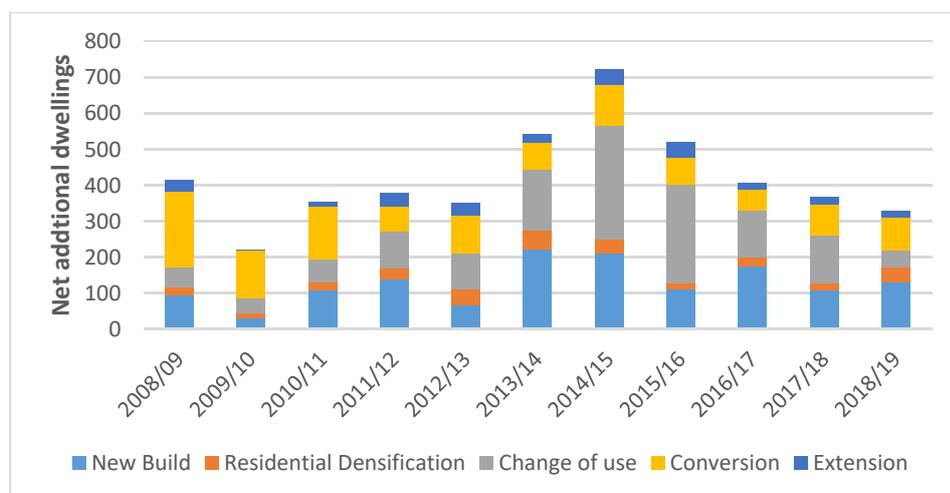


Table 8 – Approvals 2008-2019 on sites with 1-25 units, by development type (net additional conventional dwellings)

Financial Year	New build		Residential Densification		Change of use		Conversion		Extension		Total	
	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%	No. of units	%
2008/09	95	23%	21	5%	57	14%	211	51%	32	8%	416	100%
2009/10	31	14%	14	6%	41	19%	132	60%	3	1%	221	100%
2010/11	109	31%	21	6%	63	18%	149	42%	12	4%	354	100%
2011/12	138	36%	31	8%	103	27%	70	18%	38	11%	380	100%
2012/13	66	19%	46	13%	101	29%	103	29%	35	12%	351	100%
2013/14	223	41%	53	10%	168	31%	76	14%	24	5%	544	100%
2014/15	210	29%	39	5%	317	44%	113	16%	43	6%	722	100%
2015/16	112	22%	16	3%	275	53%	75	14%	42	8%	520	100%
2016/17	174	43%	27	7%	131	32%	56	14%	19	5%	407	100%
2017/18	108	30%	18	5%	135	37%	85	23%	20	5%	366	100%
2018/19	129	39%	44	13%	47	14%	91	28%	19	6%	330	100%
Total	1,395	30%	330	7%	1,438	31%	1,161	25%	287	7%	4,611	100%

5. Increasing Housing Delivery on Small Sites

5.1 Policy Options for Review

5.1.1 Lambeth Local Plan Policies - scope for review

Draft London Plan Policy H2 requires boroughs to proactively support well-designed new homes on small sites in order to significantly increase housing delivery on small sites. In response to this, Lambeth has considered various policy options. These include:

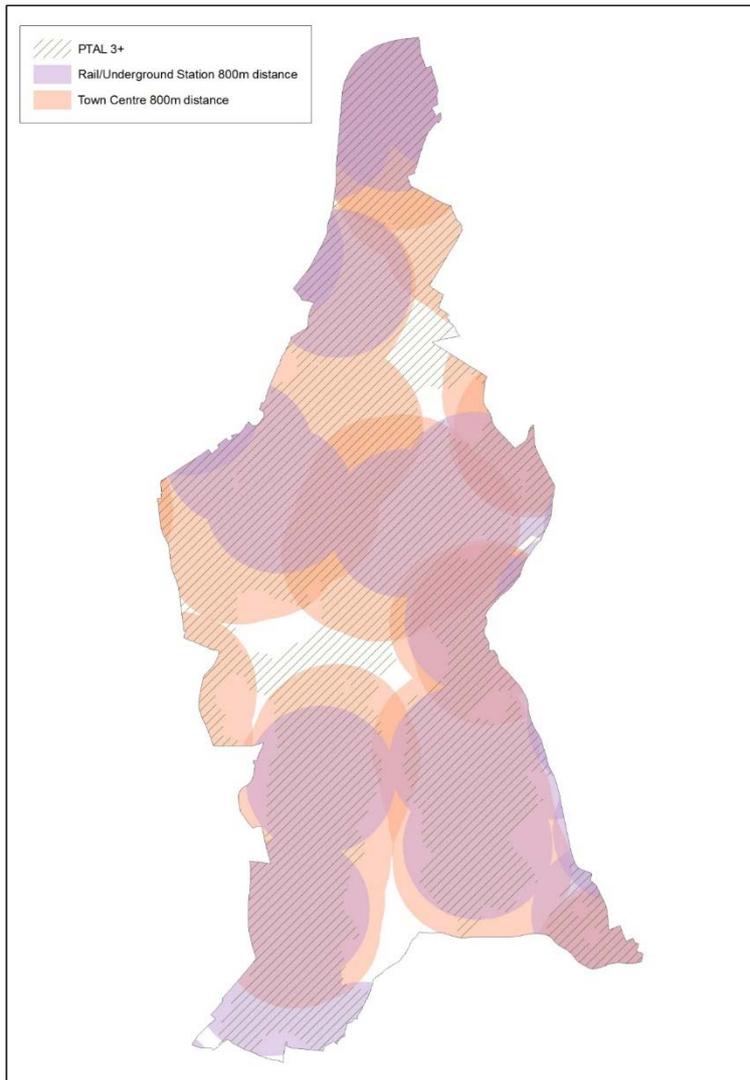
1. Changing the approach to managing residential conversions and de-conversions
2. Changing the approach to managing extensions
3. Changing the approach to managing development within the curtilage of an existing dwelling (e.g. on garden land)
4. Reducing residential external amenity space standards to increase densities

Each of these options is considered in turn below, having regard to evidence and views expressed through public consultations on issues in 2017 and the Draft Revised Lambeth Local Plan in 2018. For each option a conclusion is drawn and this is the position proposed in the Draft Revised Lambeth Local Plan Proposed Submission Version 2020.

5.1.2 Geographical scope for increasing delivery on small sites

The small sites sub target set out in the Draft London Plan is based on the assumption that housing delivery can be increased on small sites that fall within 800m of a town centre boundary or a rail or tube station, or with a PTAL rating of 3 or above. As shown in map 1 below, the majority of Lambeth falls within these areas. According to the GLA's methodology, this means there is the potential to increase residential housing delivery on small sites across most of Lambeth. Exceptions include parts of the Myatt's Field estate, part of the Clapham Park area, an area around Crown Lane and Leigham Court Road in the south of the borough, and an area between Brixton Hill and Tulse Hill.

Map 1 - Parts of Lambeth within 800m of a town centre boundary or a rail or tube station, or with PTAL 3 or above



5.2 Residential Conversions and De-conversions

5.2.1 Evolution of Residential Conversions and De-conversion Policy in Lambeth

Policy to manage residential conversions was first introduced in the Lambeth Core Strategy, adopted in January 2011. Policy S2(e) stated:

The Council will meet the borough's housing needs to 2025 by protecting all family sized houses from conversion into flats in parts of the borough under conversion stress, and protecting family sized houses of less than 150 square metres as originally constructed in other parts of the borough not on the main road network, to ensure mixed and balanced communities with a choice of family sized housing.

Parts of the borough under conversion stress were identified through the Lambeth Residential Conversions Study 2009, which suggested 362 streets where more than 50% of properties suitable for conversion had already been converted. Of these, 329 were designated as 'Streets Under Conversion Stress' in the Core Strategy 2011. The rest were on the main road network.

This policy was carried forward to the Lambeth Local Plan adopted in September 2015. Policy H6 (Residential Conversions) states:

To ensure mixed and balanced communities with a choice of family-sized housing and to manage the cumulative effects of residential conversions on environmental quality and local amenity, the council will protect dwellings suitable for occupation by families from conversion into flats or houses in multiple occupation (HMOs) as follows.

(i) In parts of the borough under conversion stress, all dwellings suitable for occupation by families will be protected.

(ii) In other parts of the borough, not on the main road network, dwellings suitable for occupation by families of less than 150m² (as originally constructed) will be protected.

No further Streets Under Conversion Stress were designated at that time.

The Lambeth Core Strategy 2011 introduced a policy allowing the loss of a residential unit to facilitate the return of a family home that had been converted to flats back to its original state. Policy S2(a) of the Core Strategy stated that "the council will meet the borough's housing needs to 2025 by preventing the loss of existing housing except where accommodation is being de-converted back from flats to a house". Policy H3(a)(i) of the Lambeth Local Plan 2015 continued this approach. It states that "exceptionally, the net loss of residential units may be acceptable where the loss arises from the amalgamation of smaller, separate flats within an original house or purpose-built flats to create a unit of family accommodation". This policy seeks to ensure that the net loss of a residential unit would only be permitted where a family unit was created.

5.2.2 Housing Delivery through Residential Conversions and De-conversions

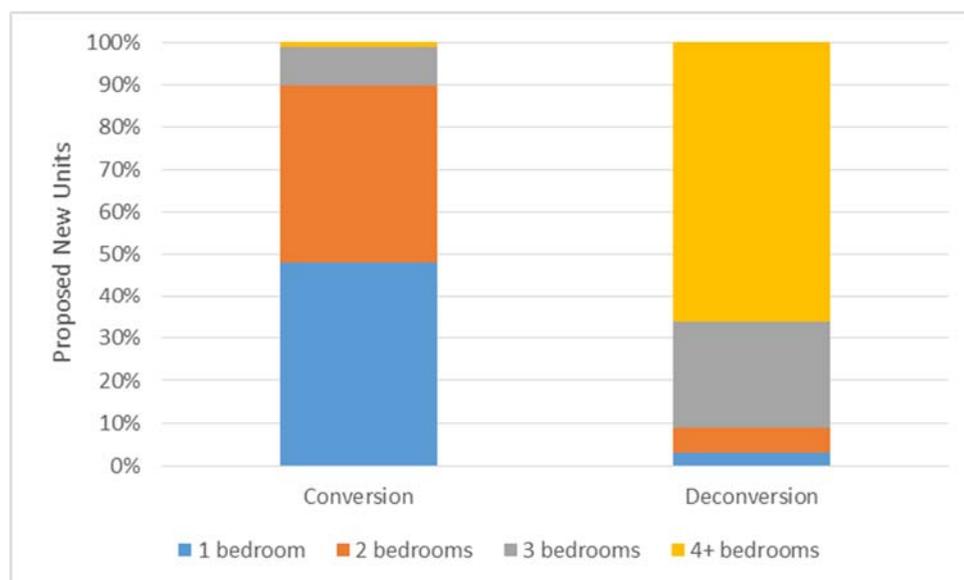
This section provides data on residential conversions and de-conversions in Lambeth since 2009. The analysis looks at completions first, then approvals. Table 9 below sets out the number of units created each year through residential conversions on sites under 0.25 hectares in size. It also includes the number lost through de-conversions, where previously subdivided dwellings are converted back to their original state. In total there has been a net gain of 1,434 units through conversions over the past 11 years, and a net loss of 157 units through de-conversions. This equates to an annual average of 130 units created through conversions and 14 units lost through de-conversions. There is a marked reduction in units created through conversions following the designation of the Streets Under Conversion Stress and associated restriction of conversions in 2011. De-conversions make up a much smaller proportion of completed schemes, with an average of 11 each year compared to 78 conversion schemes. However, these have resulted in a total net loss of 157 dwellings.

Table 9 – Residential Conversions & De-conversions 2008-2019 (completions)

Financial Year	Conversions				De-conversions				Total net additional units
	Number of schemes	Existing Units	New Units	Net Change in units	Number of schemes	Existing Units	New Units	Net Change in units	
2008/09	123	139	356	217	9	24	9	-15	202
2009/10	151	169	431	262	12	30	14	-16	246
2010/11	60	67	167	100	11	24	11	-13	87
2011/12	94	125	285	160	15	32	15	-17	143
2012/13	56	75	167	92	9	19	9	-10	82
2013/14	73	107	258	151	14	39	14	-25	126
2014/15	99	116	241	125	18	39	18	-21	104
2015/16	58	74	166	92	6	22	9	-13	79
2016/17	47	82	143	61	11	22	11	-11	50
2017/18	52	69	153	84	7	16	7	-9	75
2018/19	50	59	149	90	7	14	7	-7	83
Total	863	1,082	2,516	1,434	119	281	124	-157	1,277
Yearly average	78	98	229	130	11	26	11	-14	116

As would be expected, the majority of units created through residential conversions have one or two bedrooms (90% of all completed units). Similarly, de-conversions predominantly result in larger units with three or four bedrooms (91% of all units completed). This is shown in chart 9 below.

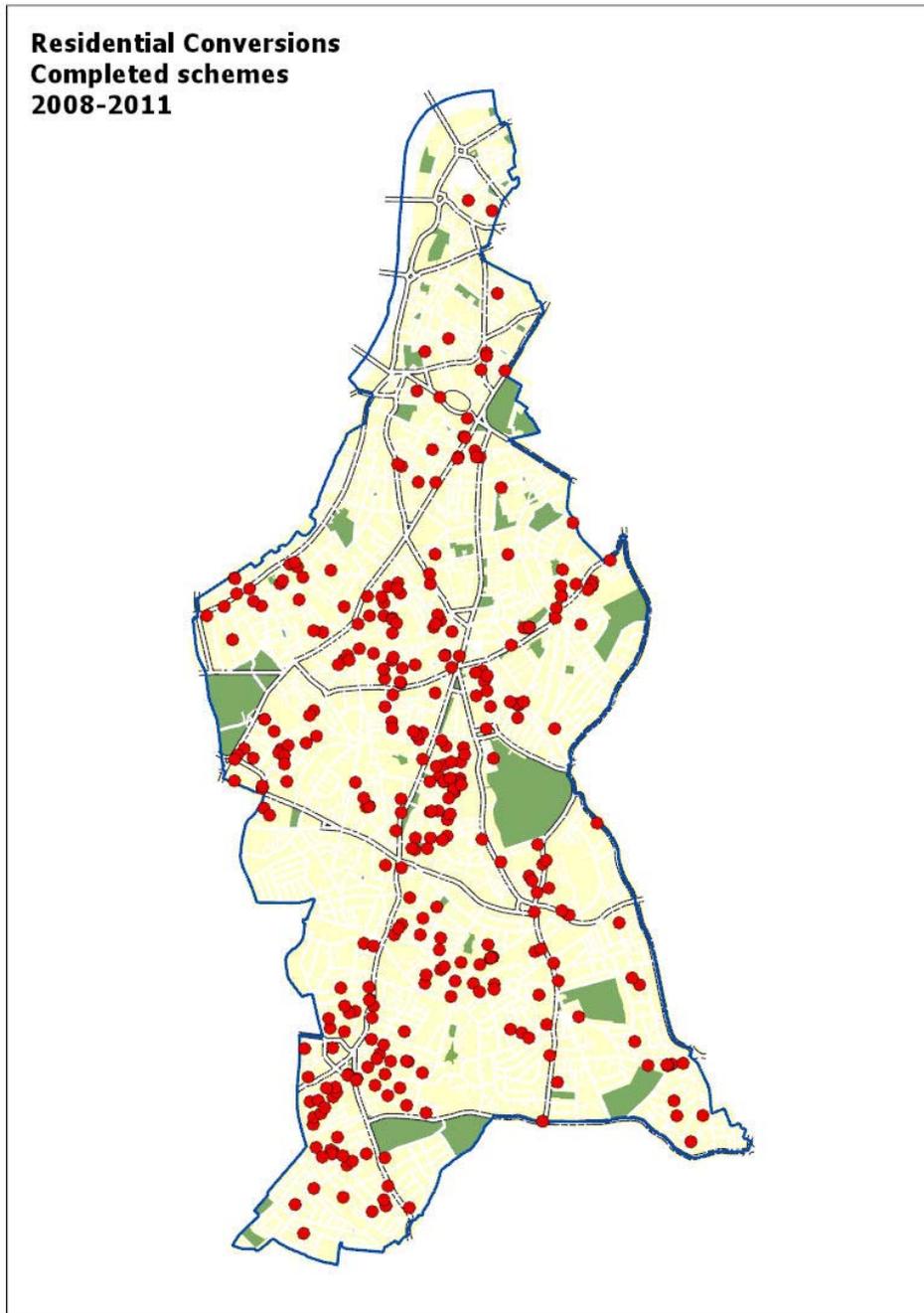
Chart 9 – New units created through conversions & de-conversions 2008-2019 (completions)



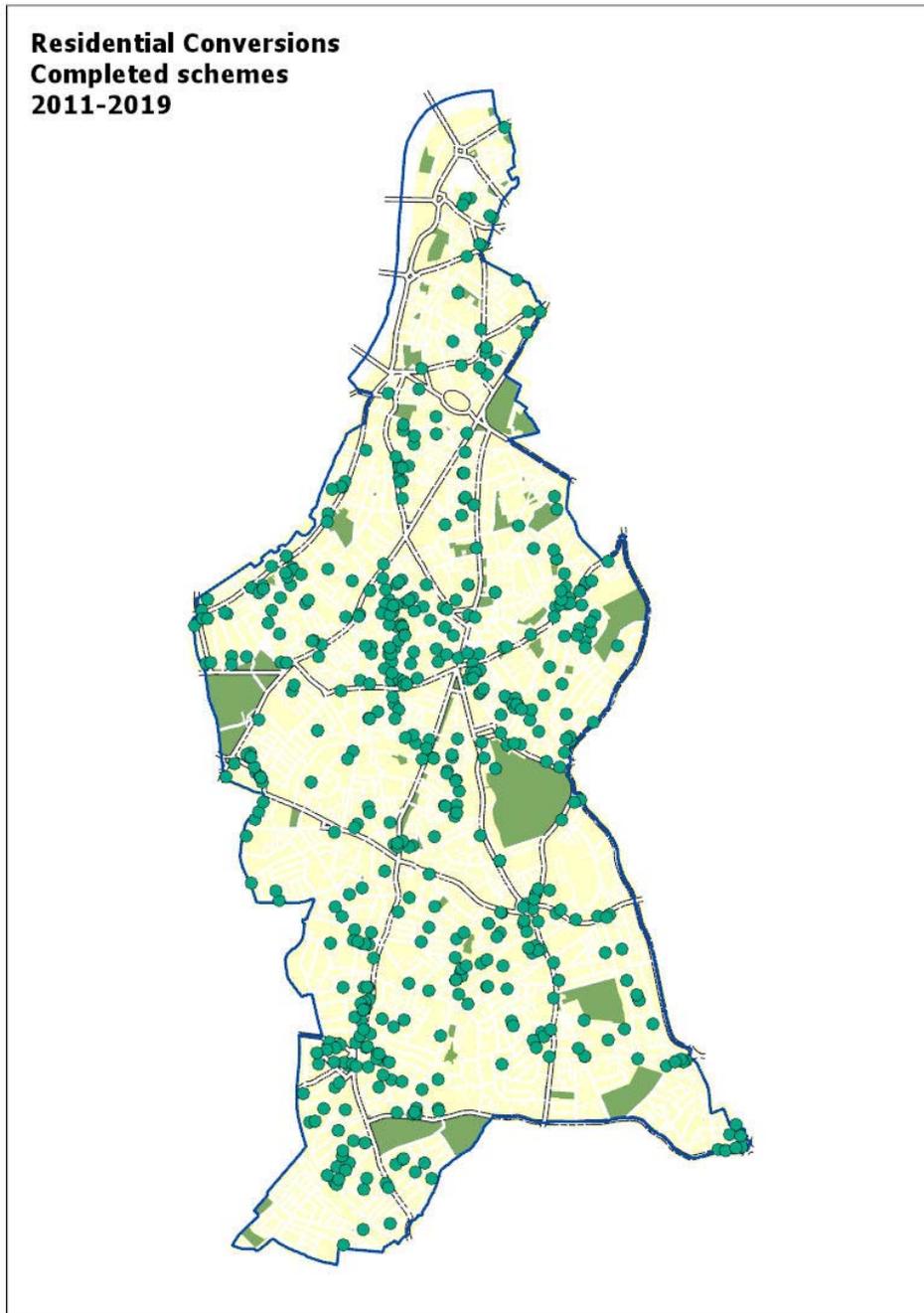
Maps 2 and 3 below show the geographical distribution of conversions throughout the borough, before and after the introduction of the residential conversions policy. Both maps show that there were conversions across most of the borough, with concentrations around Brixton/Stockwell, Streatham and Clapham. Map 3 shows that from 2011 onwards, conversions were more concentrated in certain streets, most obviously in areas bordering Clapham and around Brixton e.g. south of Clapham Common, north of Acre Lane and around Brixton Hill. There were also clusters around Ruskin Park in the east of the borough, in Crystal Palace and in Tulse Hill – in these areas there were relatively few conversions prior to 2011.

Map 4 shows de-conversions completed between 2008 and 2019. There were fewer de-conversions than conversions, and these were mainly situated in the west of the borough – especially around Oval/north Stockwell, Streatham and Clapham. There are also clusters in Herne Hill and West Norwood in the east of the borough.

Map 2 – Residential conversion schemes completed 2008-2011



Map 3 – Residential conversion schemes completed 2011-2019



Map 4 – De-conversion schemes completed 2008-2019

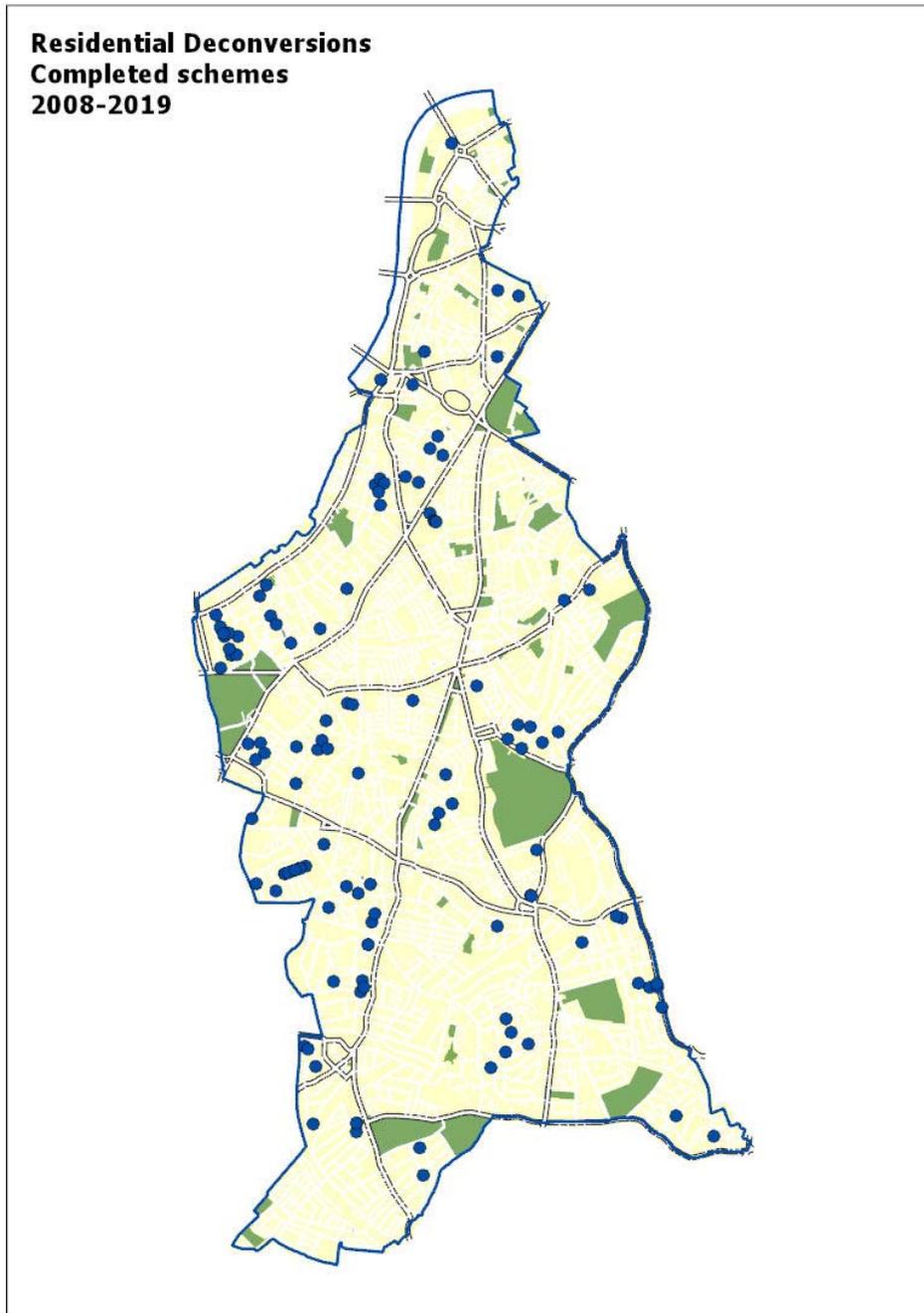


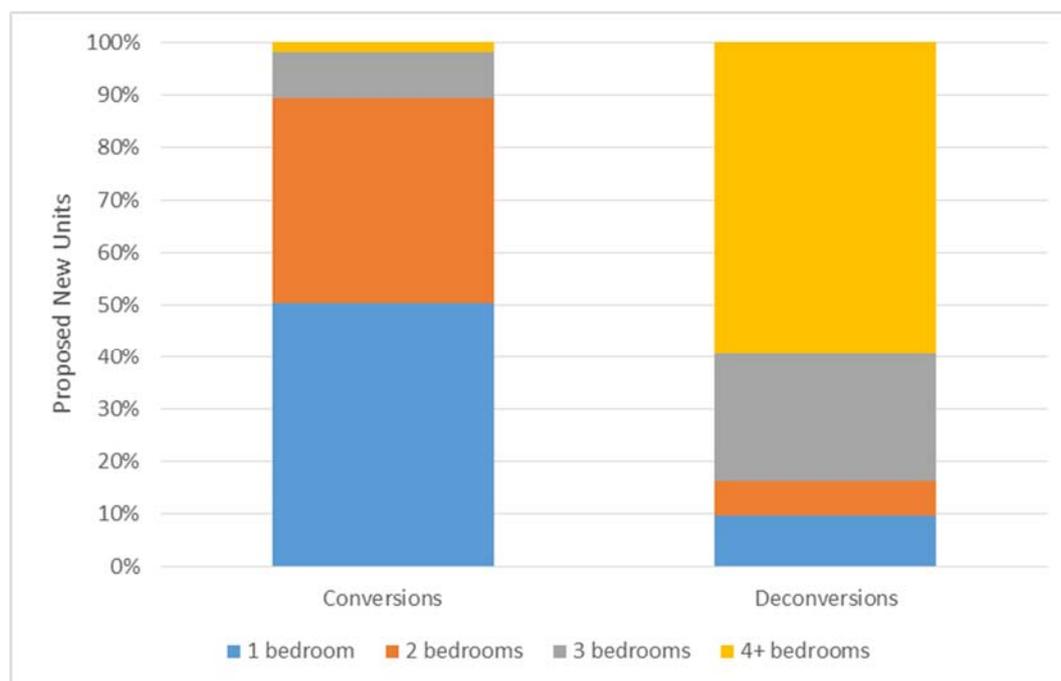
Table 10 below sets out the number of units approved each year through residential conversions, and de-conversions of previously converted houses back to their original state. There is a noticeable drop in the number of conversions approved after 2011, when the residential conversions policy was introduced.

Table 10 – Residential Conversions & De-conversions 2008-2019 (approvals)

	Conversions				De-conversions				Total net additional units
	Number of schemes	Existing Units	New Units	Net Change in units	Number of schemes	Existing Units	New Units	Net Change in units	
2008/09	125	146	379	233	16	40	18	-22	211
2009/10	81	82	224	142	10	20	10	-10	132
2010/11	95	107	276	169	16	37	17	-20	149
2011/12	63	138	203	65	13	32	13	-19	46
2012/13	90	148	266	118	9	31	16	-15	103
2013/14	73	100	227	127	20	47	20	-27	100
2014/15	80	78	207	129	11	30	14	-16	113
2015/16	46	55	139	84	9	19	10	-9	75
2016/17	58	73	147	74	16	34	16	-18	56
2017/18	59	95	188	93	7	15	7	-8	85
2018/19	55	75	178	103	8	24	12	-12	91
Total	825	1,097	2,434	1,337	135	329	153	-176	1,161

As with completions, the majority of units created through residential conversions have one or two bedrooms (89% of all units completed). Similarly, de-conversions result in larger units with three or four bedrooms (84% of all units completed).

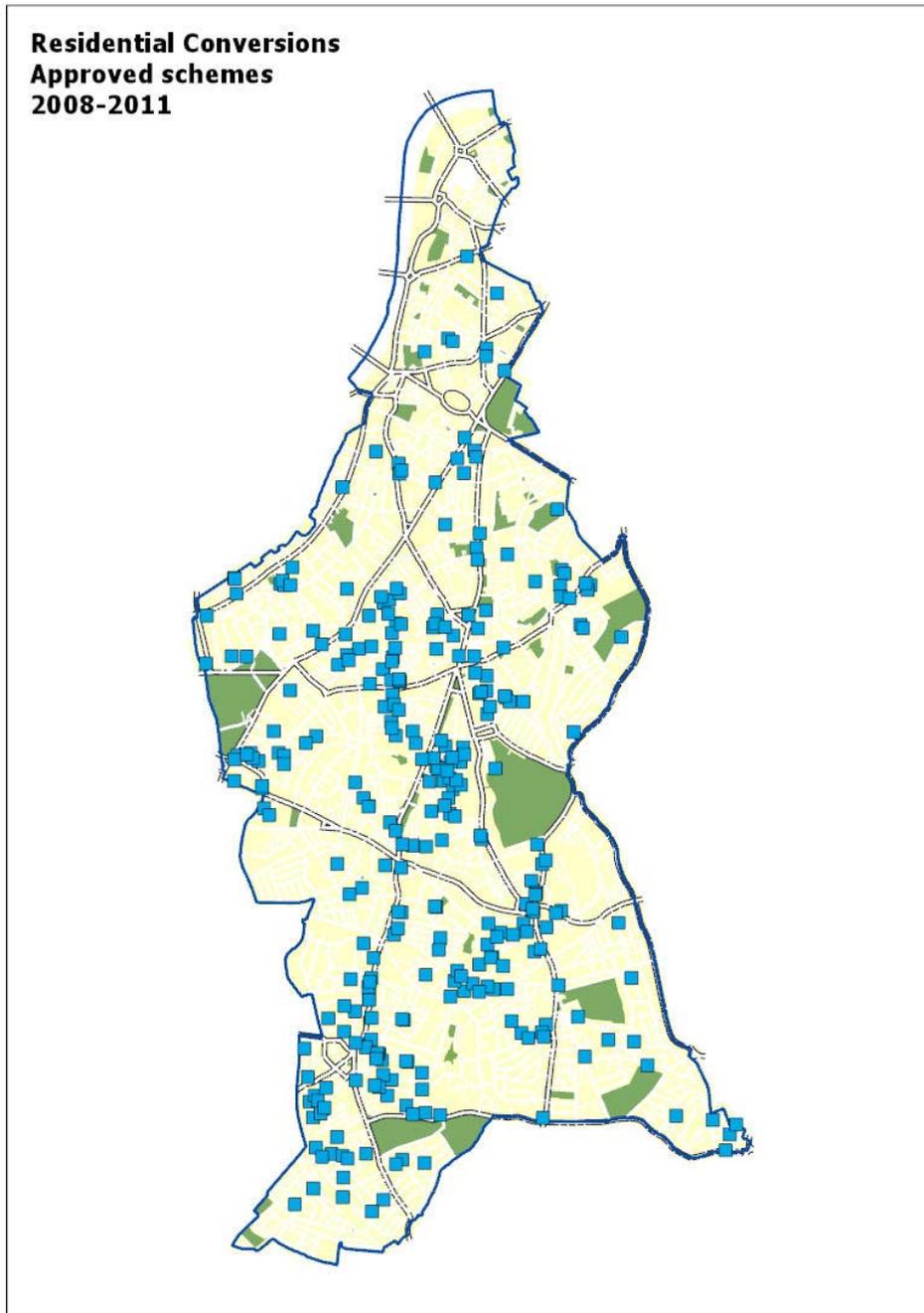
Chart 10 – New units created through conversions & de-conversions 2008-2019 (approvals)



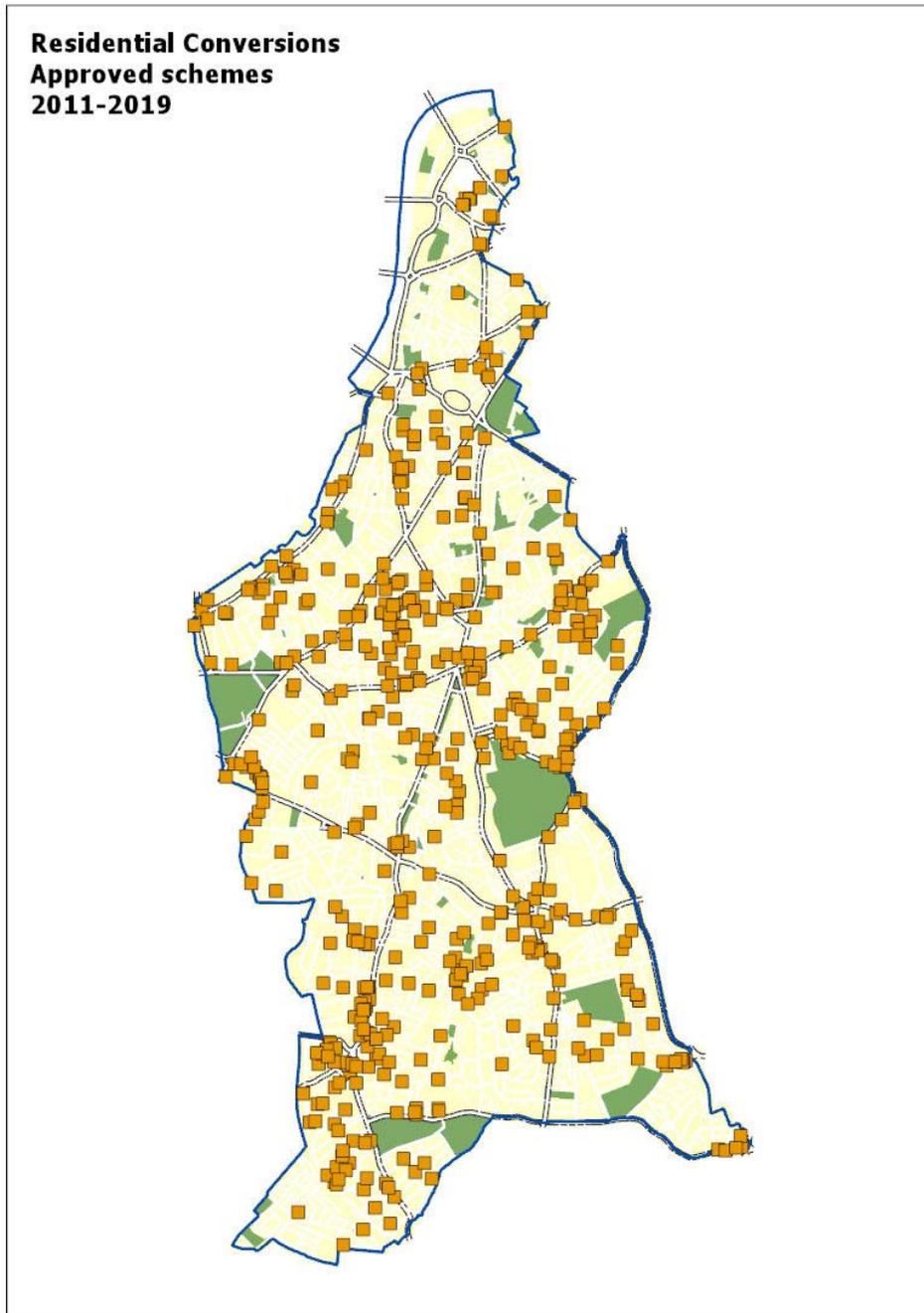
Map 5 and 6 below show the geographical distribution of conversions approved throughout the borough between 2008 and 2019. There were conversions approved across most of the borough, although there were few in the very north. This is likely to reflect the typical size of houses in different parts of the borough. Concentrations of approved schemes can be seen around the Clapham/south Stockwell area, in the Brixton area, in Streatham and Tulse Hill. After the introduction of the residential conversion policy in 2011, approved conversions were more concentrated in certain streets, most obviously to the south of Clapham Common. There were more conversions in the north of the borough (around Kennington/Oval and along Wandsworth Road) and around Herne Hill and Ruskin Park where previously there were few conversions.

Map 7 shows de-conversions approved between 2008 and 2019. There are fewer de-conversions than conversions, and these are mainly in the west of the borough – especially Oval/north Stockwell, Clapham and Streatham. There were also clusters in Herne Hill and West Norwood in the east of the borough.

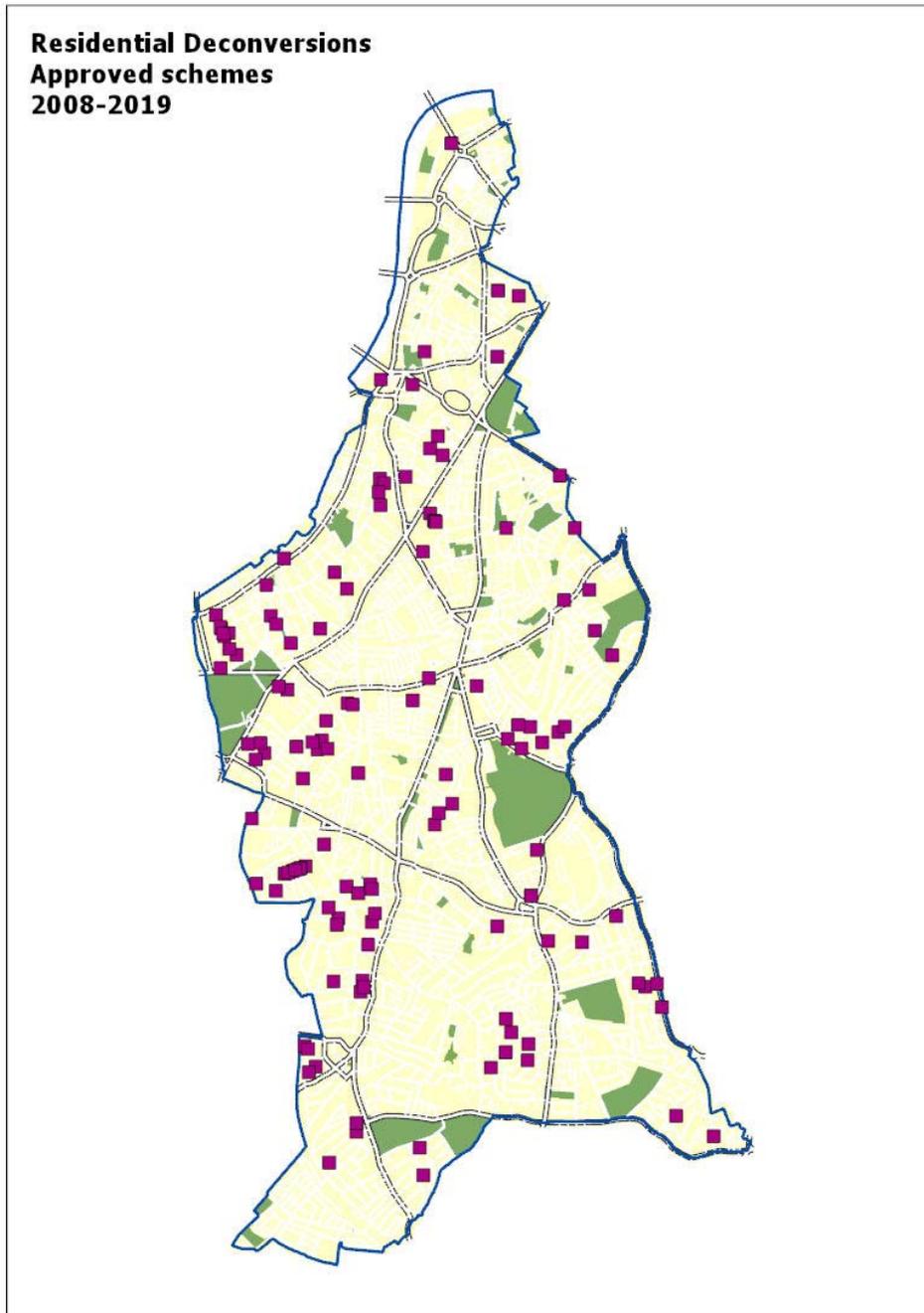
Map 5 – Residential conversions schemes approved 2008-2011



Map 6 – Residential conversions schemes approved 2011-2019



Map 7 – De-conversion schemes approved 2008-2019



5.2.3 Options to Increase Housing Delivery through Conversions

Several options have been considered to increase housing delivery through residential conversions. These include:

- Removing the Streets Under Conversion Stress designation and allowing conversions across the whole borough
- As above, but retaining some protection for units under a certain size in order to retain a stock of smaller family-sized dwellings while allowing larger dwellings to be converted
- As above, but introducing requirements to provide a family-sized dwelling(s) if conversions are to be allowed, to mitigate the loss of larger family-sized dwellings
- Introducing restrictions to mitigate the negative impacts of conversions, such as lack of amenity space and parking.

Since 2011 when the Streets Under Conversion Stress policy was introduced, an average of 106 units per annum have been delivered through the conversion of existing residential floorspace to create additional dwellings. This quantum could increase if policy was made less restrictive by allowing conversions of family dwellings across the whole borough.

Table 11 below sets out the potential additional delivery, should the Streets Under Conversion Stress designation be removed. Based on the last available data on unconverted housing stock, and the rate of conversions since 2011 (when policy H6 was introduced), around 0.65% of eligible properties were converted each between 2011 and 2017. Should policy H6 be relaxed, an estimated additional 61 units could be delivered each year (based on a minimum size threshold of 150 sqm).

Table 11 – Potential Uplift in Delivery from Change to Policy H6 (150sqm threshold)

A	Stock of unconverted dwellings (2008), currently eligible for conversion ²	5,127
B	Number of family dwellings converted, 2011-2017	198
C	Average conversions per annum (B/6 years)	33
D	Annual rate of conversions (C/A x 100)	0.65%
E	Additional units that could become eligible for conversion ³	5,018
F	Potential additional conversions per annum (D x E)	32
G	Net new units created from conversions, 2011-2017	372
H	Average net additional units created (G/B)	1.87
I	Potential net additional dwellings from conversions per annum (H x F)	61

Consultation on Proposed Changes to Policy

There have been two rounds of consultation which have addressed potential changes to the Local Plan approach to conversions. The Lambeth Local Plan Review Issues consultation was held in late 2017, and consultation on the Draft Revised Lambeth Local Plan was held in late 2018.

The Issues consultation asked to what extent people agreed or disagreed that Lambeth should maintain its policy of protecting family homes from conversion into flats. In total 170 survey responses and two written responses were received to this question, as set out in the Issues Consultation Report, published October 2018 (pages 39-40). Most respondents supported retaining the policy on protecting family homes from conversion, highlighting the importance of encouraging families to stay in Lambeth and raising a range of concerns about the negative impacts of conversions. However, some respondents acknowledged that the demand for family housing may change as families become smaller. There was also concern about affordability of large family homes, and their use as HMOs rather than family accommodation.

The Draft Revised Lambeth Local Plan 2018 proposed to de-designate Streets Under Conversion Stress and allow conversions across the borough (subject to other policy requirements). The draft revised policy set out that dwellings that are suitable for occupation by families and are less than 150 sqm will be protected, and conversion of dwellings over 150 sqm allowed where a number of other policy requirements are met, including provision of a family-sized home at ground floor level. During consultation on this approach, comments were received from 23 respondents. Reactions were evenly split between those who supported the removal of the Streets Under Conversion Stress designation and those who wished to see it retained. The Mayor commented that the proposed 150

² Unconverted dwellings data from VOA (2008). Includes all houses and bungalows on main road network plus houses and bungalows over 150 sqm on other non-protected streets. Data not available for unconverted dwellings of 130sqm and over.

³ Unconverted dwellings over 150 sqm on a current Street Under Conversion Stress

sqm threshold was excessive and should be reviewed in line with evidence reflecting local need and affordability. He went on to comment that the 150sqm threshold is above the floorspace required by the Draft London Plan for a 6-bedroom dwelling for occupation by up to 8 people. .

Consideration of Way Forward

Given the requirement for general conformity with the London Plan, it was necessary to consider reducing the threshold in response to the Mayor’s comments. In order to assess what a suitable lower threshold might be, the approach of other similar inner London boroughs was explored. There are a variety of alternative approaches to managing residential conversions whilst ensuring that a stock of family-sized dwellings is retained. Table 12 below sets out the approaches of four inner London boroughs which have a broadly similar housing stock to Lambeth. Three of these only allow conversions of dwellings over a certain size threshold, the lowest being 125 sqm in Islington and the highest 150sqm in Wandsworth. Some specify the size of dwellings that should be provided through conversions, or include other requirements such as access to garden space.

Table 12 - Inner London boroughs’ approaches to residential conversions

Borough	Min. floorspace for conversion (sqm)	Policy Wording	Policy Reference
Islington	125	A. To maintain a supply of larger homes to meet Islington's housing need the conversion of residential units into a larger number of self-contained units will normally only be permitted where the total floor area is in excess of 125m ² (gross internal) and the proposed conversion meets the following criteria: i) the dwelling mix does not include one person-sized units or multiple one double bedroom units, and; ii) at least one unit of two or more bedrooms is provided in conversions of dwellings with between 125m ² and 140m ² of existing floor area, or; iii) at least one three bedroom and one two bedroom unit is provided in conversions of dwellings in excess of 140m ² of existing floor area, unless exceptional circumstances can be demonstrated.	Islington Development Management Policies (June 2013) Policy DM3.3: Residential conversions and extensions
Southwark	130	The sub-division of single homes of 130sqm or less (original net internal floorspace, excluding attics and basements and other parts of the building not intended for habitation) into two or more homes will not be permitted.	New Southwark Plan Proposed Submission Version (December 2017) Policy P3: Protection of Existing Homes
Camden	No minimum	We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties: a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and b. includes a mix of large and small homes.	Camden Local Plan 2017, policy H7: Large and Small Homes

Borough	Min. floorspace for conversion (sqm)	Policy Wording	Policy Reference
		<p>We will take a flexible approach to assessing the mix of dwelling sizes proposed in each development having regard to:</p> <ul style="list-style-type: none"> c. the different dwelling size priorities for social-affordable rented, intermediate and market homes; d. any evidence of local needs that differ from borough wide priorities; e. the character of the development, the site and the area, including the impact of the mix on child density; f. site size, and any constraints on developing the site for a mix of homes of different sizes; g. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and h. the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing. 	
Wandsworth	150sqm	<ul style="list-style-type: none"> a. The conversion of dwellings with less than 150 sqm of existing habitable floorspace will only be permitted where the property is unsuitable for families. b. Conversions of dwellings of 150 sqm or more of existing habitable floorspace (prior to any extensions carried out since the end of 2008) will only be permitted where the following criteria are satisfied: <ul style="list-style-type: none"> i. at least one family-sized unit is provided with access to a dedicated rear garden; or ii. where four or more units are being provided, at least two are family-sized units (one of which must have access to a dedicated rear garden); and iii. the provision of 1 bedroom/studio accommodation is limited to one unit, or 1 in 5 units in larger conversions; c. All new units must comply with standards set out in Policies DMH4 and DMH6-7 and the Mayor's 2015 Housing Supplementary Planning Guidance (SPG). Further guidance including on layout and stacking, is provided in the Council's Housing Supplementary Planning Document (SPD). 	Wandsworth Development Management Policies (March 2016) Policy DMH 2: Conversions

Consideration was also given to the typical size of houses in Lambeth. Table 13 below gives examples of typical houses of various sizes in different parts of Lambeth, with an indication of floorspace and number of bedrooms. There are no comprehensive data available about the size of houses in Lambeth

Table 13 – Typical Lambeth Houses by Floorspace

Image	Location	Number of bedrooms	Indicative Floorspace
	Loughborough Junction	3 bedrooms	102 sqm
	Brixton	3 bedrooms	114 sqm
	West Norwood	3 bedrooms	124 sqm
	West Norwood	3 bedrooms	130 sqm
	West Norwood	4 bedrooms	132 sqm

Image	Location	Number of bedrooms	Indicative Floospace
	Brixton	4 bedrooms	134 sqm
	Kennington	4 bedrooms	144 sqm
	Brixton	4 bedrooms	154 sqm
	Streatham	4 bedrooms	165 sqm
	Clapham	4 bedrooms	177 sqm

Image	Location	Number of bedrooms	Indicative Floorspace
	Streatham	5 bedrooms	200 sqm

Source: rightmove.co.uk.

This overview suggests that houses with a floor area of 130sqm and above tend to have at least three but more commonly four plus bedrooms; whilst there is also a range of houses below 130sqm in floor area that have three bedrooms and are therefore family sized. By setting a threshold for conversions at 130sqm, a stock of smaller family sized houses would be retained in different parts of the borough (given the wide variety of house types available); but this would allow the larger family sized houses to be converted. This approach would reflect the threshold for conversions in other inner London boroughs with similar housing stock (such as Southwark, or Islington – although in the latter the threshold is in fact set lower).

However, while the demographic trend in Lambeth is towards smaller households (see SHMA 2017 page 63), it is important to maintain a stock of family-sized dwellings to meet housing need among families and to enable those wishing to stay in the borough after they have children to do so. This is also important to maintain and foster mixed and balanced communities and to promote community cohesion, so that a street or neighbourhood does not become dominated by a single household size or type. It is therefore considered essential to ensure that the policy approach to residential conversions includes a provision to include a family-size dwelling with garden access, where practicable, to maintain that stock and balance in supply. In addition, given that conversions will increase the number of households in a street, it is important to manage the additional demands this will place on communal spaces for waste bins and parking, for example, and to protect residential amenity. The proposed new policy approach therefore retains and updates measures to manage potential harmful impacts of residential conversions. The policy ensures occupiers of additional units do not have access to parking permits in order to mitigate parking stress, and requires provision of adequate cycle storage facilities. In combination with the policies on housing standards (H5), amenity (Q2) and extensions (Q11), provision is made for adequate amenity space for each dwelling, with protection of amenity by managing the relationship with neighbouring properties.

5.2.4 Proposed Change to De-conversions Policy

As shown in Table 9, the de-conversion of family dwellings back to their original state has over the past ten years resulted in the net loss of 14 units per year on average. The Draft Revised Lambeth Local Plan 2018 proposed to retain the approach of allowing de-conversions. During consultation, the Mayor asked for this approach to be amended to be consistent with the London Plan. His response stated that “Lambeth should amend its approach that supports the amalgamation of units to create 3bed+ residential accommodation. Occupiers should firstly look to extend

properties, in line with draft London Plan policy H2 to create larger units, instead of the proposed approach that would result in the loss of residential units. In addition, in line with the results of the London SHMA, Lambeth should be satisfied that resulting large units will be occupied by a family, and not sharers as is potentially identified in paragraph 4.12.2 of the draft London Plan. The proposed approach could frustrate the presumption in favour of small housing development and could also encourage the development of over-sized homes in the borough, that are not affordable to local residents in need of family housing. The policy should be amended to consider these matters and put in place measures to monitor the effects of this policy in line with draft London Plan paragraph 4.2.11.”

Lambeth has considered this comment carefully in light of the evidence. Although the loss of units through de-conversions in Lambeth is relatively small, given unmet housing need in the borough and the evidence on affordability and reducing household size, it is considered preferable to maintain the existing stock of converted houses rather than allow the re-creation of very large houses which do not meet priority need and result in a loss of units overall. Importantly, the proposed policy on residential conversions includes provisions to ensure retention and provision of smaller family sized homes. In combination with the evidence on reducing household size, it is therefore not possible to sustain an argument that de-conversions are necessary to meet need for family-sized homes in Lambeth.

The DRLLP PSV 2020 therefore proposes to amend policy H3 so that the amalgamation of smaller, separate flats within an original house is no longer permitted.

5.3 Additional units created through extensions

5.3.1 Extensions Policy in Lambeth

Lambeth’s current approach to extensions is set out in policy Q11 of the Lambeth Local Plan 2015. This approach to extensions, adopted in 2015, provided more flexibility than the Council’s previous position with regard to roof extensions and two storey rear extensions. In combination with the Supplementary Planning Document on Building Alterations and Extensions (also adopted in 2015), this policy approach is considered to have worked effectively since 2015 in improving the management of this type of development to achieve an appropriate balance between flexibility for householders and protection of neighbouring residential amenity.

It should be noted that not all extensions result in the creation of an additional self-contained residential unit. Where they do, this is usually in combination with a residential conversion. However, extensions alone can provide an effective and relatively affordable way for households to expand, in some cases preventing the need to move house altogether. This flexibility for householders in Lambeth is important to maintain and promote mixed and balanced communities and help provide more affordable types of market housing.

5.3.2 Housing Delivery through Extensions

This section sets out the number of units delivered through extensions over the past nine years in Lambeth. These developments provide new dwellings that are wholly contained within an extension of an existing building, such as where additional floors have been added.

The tables below show that this category of development contributes a small but steady supply of new dwellings. On average over the past ten years, 24 units per year have been completed on sites below 0.25 ha (2.0% of all units) or 23 per year on schemes with fewer than 25 units, or 1.9% of all units. An average of 27 units in extensions have been approved each year, across all sites.

Tables 14 and 15 below show units delivered by the site area of the scheme. The majority of units created through extensions are on the smallest sites, with 96% of completions and 92% of approvals on sites under 0.1ha.

Table 14 – Completion of new units through extensions (by site area) 2008-2019

Financial Year	Site area				Total
	Under 0.1 ha	0.1 ha and over, up to 0.25ha	0.25 ha and over, up to and including 0.5 ha	Over 0.5 ha	
2008/09	27	0	0	0	27
2009/10	35	0	0	0	35
2010/11	1	5	0	0	6
2011/12	16	1	0	0	17
2012/13	7	0	0	0	7
2013/14	20	0	0	0	20
2014/15	38	0	0	0	38
2015/16	28	0	2	0	30
2016/17	35	4	0	0	39
2017/18	21	1	0	0	22
2018/19	21	0	0	0	21
Total	249	11	2	0	262
Yearly average	23	1	0	0	24

Table 15 – Approvals for units created through extensions (by site area) 2008-2019

Financial Year	Site area				Total
	Under 0.1 ha	0.1 ha and over, up to 0.25ha	0.25 ha and over, up to and including 0.5 ha	Over 0.5 ha	
2008/09	32	0	0	0	32
2009/10	2	1	0	0	3
2010/11	12	0	0	0	12
2011/12	38	0	0	0	38
2012/13	35	0	0	0	35
2013/14	37	0	2	0	39
2014/15	37	6	0	0	43
2015/16	42	0	0	0	42
2016/17	19	0	0	0	19
2017/18	5	2	13	0	20
2018/19	19	0	0	0	19

Total	278	9	15	0	302
Yearly average	25	1	1	0	27

Tables 16 and 17 show the number of units created through extensions, by the size of the scheme in terms of unit numbers. While the majority of units created through extensions are the smallest schemes (1-9 units), a significant minority are on larger schemes: 10% of extension units completed are on schemes with 10-25 units, and 11% of extension units approved.

Table 16 – Completion of new units through extensions (by scheme size) 2008-2019

Financial Year	Scheme Size			Total
	1-9 units	10-25 units	26+	
2008/09	27	0	0	27
2009/10	26	9	0	35
2010/11	6	0	0	6
2011/12	17	0	0	17
2012/13	7	0	0	7
2013/14	19	1	0	20
2014/15	27	0	11	38
2015/16	14	12	4	30
2016/17	35	4	0	39
2017/18	22	0	0	22
2018/19	21	0	0	21
Total	221	26	15	262
Yearly average	20	2	1	24

Table 17 – Approvals for units created through extensions (by scheme size) 2008-2019

Financial Year	Scheme Size			Total
	1-9 units	10-25 units	26+	
2008/09	32	0	0	32
2009/10	3	0	0	3
2010/11	12	0	0	12
2011/12	38	0	0	38
2012/13	34	1	0	35
2013/14	24	0	15	39
2014/15	31	12	0	43
2015/16	35	7	0	42
2016/17	19	0	0	19
2017/18	7	13	0	20
2018/19	19	0	0	19
Total	254	33	15	302
Yearly average	23	3	1	27

5.3.3 Proposed Approach to Extensions

Policy support for mansard additions (on properties with London roofs) and rear mansards (on properties for pitched roofs) has permitted numerous upward extensions and loft conversions since 2015. In the majority of cases these have provided additional accommodation for existing residential units. However, there has been a steady supply of new units created through extensions, as shown above, averaging 24 units per year on sites under 0.25 ha. The current approach married with the proposed change in the policy approach to the conversion of houses into flats has the potential to deliver additional homes.

Therefore it is not proposed to amend the approach to extensions in the Draft Revised Lambeth Local Plan Proposed Submission Version.

5.4 Units created within the curtilage of an existing residential dwelling

5.4.1 Policy Approach and Options for Review

Policy Q14 of the Lambeth Local Plan 2015 restricts development on garden land, in order to protect the amenity, wellbeing and biodiversity value which gardens provide. Under the current approach, new buildings in rear and return frontage gardens will only be supported where a significant proportion (no less than 70 per cent) of the existing garden is retained with the host building, the building is subordinate to the context, and meets a number of other criteria relating to the design, scale and positioning of the development.

There is a strong relationship between garden size and amenity: the smaller the rear gardens the shorter the back-to-back distances between properties and thus the greater the likelihood of poor amenity such as overlooking, noise, overbearing impacts due to proximity, and general lack of space. When Policy Q14 in the Lambeth Local Plan 2015 was drafted, the desire to retain 70 per cent of a rear garden with the host building was in part a response to this relationship. It was considered that 70 per cent would ensure adequate separation distances were retained between the host and new dwelling.

However, the wording of current policy Q14 is less flexible than the approach in the Lambeth UDP 2007 and Core Strategy 2011. UDP Policy 38(c) (which was saved under the Core Strategy) lists a number of factors to which special regard would be paid in the consideration of proposals for back-land and in-curtilage developments. These factors included the density and height of a proposal in relation to existing dwellings; the outlook and privacy of existing dwellings; and access. It also stated that sufficient garden depth and area should be retained, although no benchmark is given.

A potential option to increase development on small sites would be to reduce the proportion of the existing garden which must be retained, to increase the number of sites available. The Mayor's representation on the DRLLP 2018 advised Lambeth to take a more proactive approach to garden development and that Q14 should be amended. He commented on the Draft London Plan's recognition that accommodating housing growth on small sites may lead to a change in character in some areas, and that boroughs are able to manage this change through design codes.

5.4.2 Applications for New Homes within the Curtilage of an Existing Dwelling

This section looks at planning applications for new homes within the curtilage of an existing residential dwelling. In order to assess the impact of policy Q14, a ‘key word’ search of descriptions of development was undertaken for all applications between 2008 and the adoption of the Local Plan 2015, and then applications after 2015. The application submissions were then checked to confirm the nature of the proposal.

For the period prior to 2015, the search generated only four results which are insufficient in number to draw generalised conclusions. These cases are shown in table 18 below.

Table 18 – Applications for Development within the curtilage of an existing residential dwelling between 2008 and September 2015

Application Ref.	Address	Development Description	Approved/ Refused/ Withdrawn	LBL Location	Host building Rear Garden Size (sqm)	Development Site Area (sqm)	Percentage of original rear garden retained with host
08/01087/FUL	Land rear of 41 Kings Ave	Erection of three storey single dwelling house	Approved	Mid	212.6	130	39%
08/00333/FUL	Rear Of 69 Mitcham Lane	Erection of three storey building to provide 3 self-contained flats	Approved	South	378.7	226.8	60%
09/04208/FUL	Rear Of 384 Clapham Road	Erection of two storey single dwelling house (including basement)	Refused	North	1248.2	184.4	85%
12/00784/FUL	Land Rear Of 132 Leigham Court Road	Erection of five storey building to provide 20 self-contained flats & the erection of 5 x two storey houses	Approved	South	2752.6	2752.6	0% (a side garden was retained for the host building)

The results for applications post September 2015 are set out in table 19 below. This shows that, since 2015, there has been an increase in applications affecting rear gardens when compared to the preceding period.

Table 19 – Applications for Development within the curtilage of an existing residential dwelling after September 2015

Application Ref.	Address	Development Description	Approved/Refused/Withdrawn	LBL Location	Development Site Area (sqm)	Host building Rear Garden Size (sqm)	Percentage of original rear garden retained with host
15/05054/F UL	48 Sidney Road	Erection of dwelling house with basement	Refused	North	43.9	61	29%
15/07292/F UL	Land Adj To 172 Knolly's Road	Erection of four storey dwelling house	Approved	Mid	249.3	467.7	53% (the new house was erected on side garden and the rear garden split along its length)
15/07457/F UL	797 Wandsworth Road	Erection of two storey Single dwelling house	Refused	Mid	5.2	29.9	17%
16/01760/F UL	Land At Beckett Close	Erection of two storey single dwelling house	Refused – Appeal Dismissed	South	108	238.3	45%
16/02683/F UL	Plot Adj 1 Deepdene Road	Erection of three storey single dwelling house.	Refused – Appeal Allowed	Mid	267.5	383.9	31%
16/03046/F UL	Plot Before 6 Cawnpore Street	Erection of two storey single dwelling house	Approved	South	77.6	134.4	43% (site circumstances deemed retention of 70% unnecessary)
17/02209/F UL	Dover House Cormont Road	Erection of single dwelling house	Refused	Mid	297.7	929.6	68%
17/04055/F UL	63 Barrington Road	Erection of two storey single dwelling with basement	Refused	Mid	115.7	255.7	55%
16/05405/F UL	77 Alexandra Drive	Erection of two storey single dwelling house	Refused – Appeal Dismissed	South	203	437.4	54%

Application Ref.	Address	Development Description	Approved/Refused/Withdrawn	LBL Location	Development Site Area (sqm)	Host building Rear Garden Size (sqm)	Percentage of original rear garden retained with host
17/01740/F UL	14 Belmont Road London SW4 0BY	Erection of a new single storey dwelling house	Refused	Mid	155.1	234.5	34%

The majority (80%) of applications for development in gardens submitted post adoption of the Local Plan (2015) were refused. Policy Q14 would have been one of a number of policies used to assess these schemes. Other policies such as Q2 (Amenity) and Q10 (trees) are likely to also have been considered. However, it is clear from the figures presented that none of the refused schemes met the requirement for 70 per cent of the rear garden to be retained with the host building, which is a key requirement of Policy Q14. This illustrates that, as a general rule, the application of Policy Q14 has been consistent. The two cases (20 per cent) that were approved were justified on the basis of site-specific circumstances.

The conclusion from the analysis above is that policy Q14 has been effective in limiting development in rear gardens. However, this approach could potentially be considered too ‘blunt’ a policy instrument for what are often quite nuanced circumstances. There may be scope to refine the policy approach to achieve housing delivery whilst at the same time maintaining adequate residential standards.

5.4.3 Garden Size Analysis

The vast majority (90 per cent) of the applications since 2015 were for gardens in the middle and south of the borough. This reflects the fact that gardens generally increase in size from north to south as Lambeth changes from dense urban to more spacious suburban character. Evidence of that change in character is considered in this section.

To test whether 70 per cent should continue to be the rule, calculations were undertaken to ascertain what size of garden would be required to allow for 30 per cent of it to deliver a new dwelling compliant with national technical standards and Lambeth’s amenity space policy (H5).

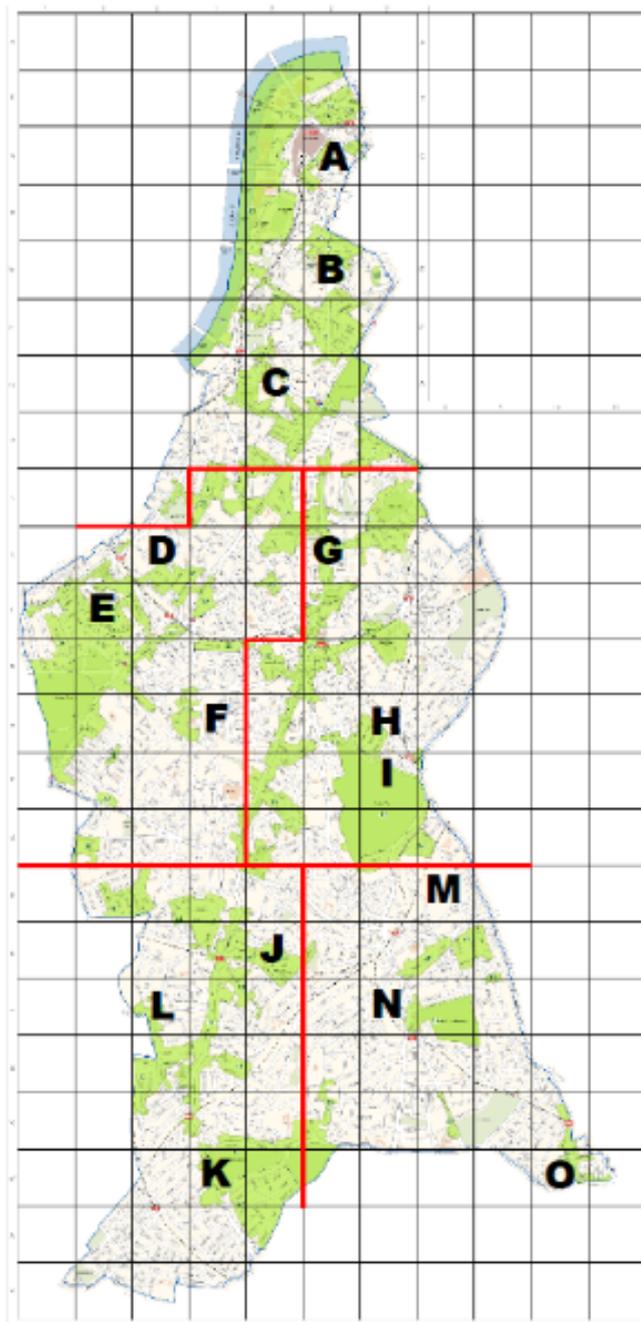
The approach taken builds on the evidence developed as part of the Lambeth Local Distinctiveness study (2012). That study used a sample of OS map squares across Lambeth (10 per cent of the total number of map grids) as a means of assessing the borough’s character. Even coverage was maintained by dividing the borough into northern (sample grids A-C), middle (sample grids D – I) and southern parts (sample grids J – O). This approach is illustrated in map 8 below.

Five rear gardens were selected from within each sample map grid. Care was taken to select a range of representative garden sizes within each grid. The measurements were taken from the Council’s digital mapping system which has an area calculator function. The results verify the presumption that garden size in Lambeth increases towards the south of the borough:

Table 20 – Average garden sizes across Lambeth

Location	Average garden size (sqm)
Northern Lambeth	52
Mid Lambeth	97
Southern Lambeth	185

Map 8 – Sample of garden sizes across Lambeth



The table below illustrates that only the largest gardens in Lambeth are capable of accommodating development which meets the 70 per cent/30 per cent requirements of Policy Q14. Returning to table 19 (applications since 2015), it can be seen that it is generally these largest gardens which are coming forward for development. Looking at average garden sizes (table 20) it is clear that gardens in excess of the minimum area required for new housing (260 sqm) are generally going to be found in the south of the borough and even then, will be noticeably larger than the average garden found there (185 sqm).

Table 21 - Garden required to meet policy Q14 requirements

Dwelling type (b = bedroom p= person)	Minimum <u>internal</u> floor area required by technical housing standards (including storage).	Lambeth Local Plan policy H5 amenity space requirement	Lambeth Local Plan policy Q14 requirement – set 1m in from boundary plus wall depths	Area required for the new Dwelling plus its amenity space.	Area of host garden needed for the area required to be 30% of its total (sqm)
1b1p	38	30	20	88	293
1b2p (single storey)	52	30	29	111	370
1b2p (two storey)	60 (g/f footprint 30)	30	18	78	260

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This is further illustrated by the following examples of typical Lambeth gardens (Table 22).

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Table 22 – Examples of typical Lambeth gardens

Property Details	Image	Map
21 Turret Grove Mid Lambeth 116 sqm		
157 Kennington Road North Lambeth 117sqm		
74 Thornlaw Road Mid Lambeth 109sqm		
15 Nuthurst Avenue South Lambeth 107sqm		

5.4.4 Proposed DRLLP PSV approach

In light of these considerations, and the requirement for a proactive approach to increasing housing delivery on small sites in the Draft London Plan (reinforced by the Mayor’s comments in response to Regulation 18 consultation on the Draft Revised Lambeth Local Plan), a revised approach to policy Q14 is proposed in the Draft Revised Lambeth Local Plan Proposed Submission Version. This involves removing the requirement to retain 70 per cent of the existing garden for the host building and replacing it with a new approach that requires (outside of conservation areas) retention of no less than 50 per cent of the total area of curtilage, excluding the ground area of the original dwelling. This is combined with application of the minimum requirements for external amenity space set out in policy H5, for both the host building and the new dwelling(s) on the site, plus an additional 10m² amenity space for every bedroom above three in the host building. Other policy requirements are retained, including subordination in height and scale to the host building; safe, direct and adequate access arrangements; and no unacceptable impacts on amenity.

This proposed new approach is considered to achieve the appropriate balance between supporting potential for some new housing development on this type of small site, whilst maintaining a high quality of accommodation and amenity for neighbours as well as occupants of the host building and new dwellings. This approach is anticipated to result in a moderate increase in housing provision in those parts of the borough where gardens are largest. It is unlikely to facilitate significant growth where garden sizes are medium to small. The approach is therefore expected to enable a gradual and proportionate evolution in the character of those parts of the borough that offer some capacity for further housing growth of this type. Other policies in the DRLLP PSV will ensure adequate consideration is given to matters such as trees, landscape, urban greening and biodiversity.

To supplement this policy approach, and as recommended in the Draft London Plan, Lambeth is bringing forward a Design Code Supplementary Planning Document as guidance to the revised Local Plan. This will identify the key planning considerations for development in residential curtilages and focus designers on ensuring positive outcomes where designing such schemes. It will include illustrated examples of best practice. This SPD will be published in draft for consultation in February 2020, to help inform stakeholders’ consideration of the proposed approach in DRLLP PSV policy Q14.

5.5 Residential Amenity Space Standards

5.5.1 Local Plan Policy

Policy H5 of the Lambeth Local Plan 2015 sets out housing standards, including dual-aspect accommodation and external amenity space. For new flatted developments, communal amenity space of at least 50 sqm per scheme should be provided, plus a further 10 sqm per flat provided as either balcony/terrace/private garden or consolidated with the communal amenity space. For new houses, at least 30 sqm private amenity space per house should be provided. Houses, ground-floor flats and family sized units should preferably have direct access to a private garden.

Lambeth requires a larger amount of external amenity space than the Draft London Plan standards. The London Plan standards for outdoor amenity space are a minimum of 5 sqm of private outdoor space for 1-2 person dwellings and an extra 1sqm for each additional occupant. The minimum depth and width for all balconies and other private external spaces should be 1.5m. An option for the Lambeth Local Plan Review could be to reduce the amount of external amenity space required for new residential units

5.5.2 Options for Review of Amenity Space Standards

Population growth means that existing open spaces will be under increased pressure. It is considered important that residential developments provide adequate open space/external amenity areas for residents. This is particularly important in areas that are deficient in open space, which is a factor across much of the borough. Access to external amenity space provides numerous benefits, including mental health and wellbeing, physical health, improved air quality, space for children to run and play, areas for drying clothes and enjoying outdoor activities close to home.

Being one of the most densely populated areas in the country there are limited opportunities for creating major new areas of open space in the borough. It is therefore essential that opportunities to provide amenity space in new residential developments are maximised. The standards set out in Policy H5 have been applied in Lambeth since 2008. These established standards have been shown to be deliverable and have achieved good results without compromising housing delivery – as evidenced by Lambeth’s very strong track record in meeting and exceeding its housing targets (see Annual Position Statement 2019).

During the Issues Consultation stage of the Local Plan Review, the following question was asked: “We should sometimes relax the requirement for private gardens and balconies in new blocks of flats to enable more housing to be provided. To what extent do you agree or disagree with this statement?”. The Issues Consultation Report (page 30-32) sets out that nearly 80% of respondents disagreed or strongly disagreed with relaxing the requirements for private gardens and balconies due to the negative impacts on health and wellbeing and quality of life. Respondents also raised concerns about the impact on the environment, existing open spaces and the importance of green spaces for improving air quality.

Given that there are other ways to increase housing delivery from small sites (as set out above in relation residential conversions, de-conversions and garden land), reducing residential amenity space standards is not considered a priority or the most effective option for increasing housing delivery on small sites. It is important to maintain a balance between gradual changes to character

and incremental increases to housing density on the one hand, and the quality of the residential environment on the other. One objective cannot be pursued at the expense of the other. Given the priority placed on urban greening, biodiversity, mitigate of climate change, health and well-being and equality for protected characteristics (including children and young people and those in lower socio-economic groups), maintenance of a good standard of external amenity space in new dwellings – comparable to that achieved in other new developments in recent years – is very important.

Therefore, no change is proposed to the existing standards for new houses in policy H5. However, for new flatted developments, a change of approach is proposed in relation to provision of communal space to improve deliverability of the policy. Under the proposed approach in the DRLLP PSV, the provision of 50m² communal amenity space in addition to 10m² per unit will now only be required for schemes of ten or more units. This is because schemes with fewer than units are rarely able to meet this requirement, so the current adopted policy approach has proven not be to work well in practice. This revision should be more effective in providing the requisite external amenity space, whilst taking account of the different circumstances affecting different sizes of scheme.

Finally, a proposed new requirement has been introduced (policy H5(b)(iv)) for non-self-contained developments to provide communal external amenity space, with quantities relating to the number of occupants. Under current adopted policy, there is no specific quantified requirement to provide external space in this type of development. In practice this has raised concerns about the quality of accommodation for occupants, such as students and young adult sharers; and about the added pressure this lack of provision will place on the use of nearby parks and open spaces. With the arrival of proposals for large-scale purpose-built shared living, this consideration is now increasingly important. The proposed additional policy provision for non-self-contained accommodation will help ensure this element is systematically considered in future.

6. Conclusion

Lambeth has a good record of housing delivery on small sites but there is a requirement in the Draft London Plan to proactively support increased housing delivery on this type of site. This is important to ensure that Lambeth is able to meet and exceed its housing target particularly given a dwindling supply of larger sites in the borough. Consideration of options, having regard to evidence, sustainability appraisal and comments expressed through consultation, has resulted in a proposed change to policy approach in the DRLLP PSV for residential conversions and de-conversions, and for development within the curtilage of an existing dwelling.

Existing external amenity space standards will be retained (with some adjustment to improve deliverability), as will the existing overall policy approach to extensions.

These policies will be supported by positive design guidance in the form of a Design Code SPD. This will support implementation of revised Local Plan policies to ensure good design outcomes. The Design Code SPD will be available in draft for public consultation in February 2020.