

# Lambeth Residential Conversions Study

## Final Report

**November 2009**

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# 1. Introduction

## Background

- 1.1 The London Borough of Lambeth appointed Atkins in December 2008 to assess the impact of residential conversions of houses to flats. The London Borough of Lambeth Unitary Development Plan has a policy framework in place that allows residential conversions but under specific circumstances. This is supported by a Supplementary Planning Document. The study was commissioned to provide an evidence base for the Core Strategy Policies on residential conversions. The Council's consultation on the Core Strategy has identified there is local concern regarding the scale of conversion activity in the borough

## Scope of Study

- 1.2 It is the purpose of this study to assess the extent of residential conversions in the Borough, the impact on the housing supply and availability of family housing, and the effect on the amenity and character of residential neighbourhoods and the ability to achieve and maintain mixed and balanced communities in the context of national, regional and local policy and to make recommendations on the future treatment of conversion activity on the basis of the information presented.
- 1.3 The results of this study will be used to provide evidence in support of the Council's Core Strategy and Development Management Policies DPDs.

## Report Structure

- 1.4 This draft final report sets out the consultants' findings and recommendations. The report is presented in 5 sections as follows:
- Section 2: Policy Review: sets out relevant national, regional and local guidance as well as providing an analysis of other London Borough policies and planning appeals;
  - Section 3: Identification of sub areas and cluster activity: defines sub areas and identifies clusters of existing residential conversions in the Borough;
  - Section 4: Socio-Economic Profiling: analyses relevant social and demographic indicators within the Borough at super output and output area level.
  - Section 5: Environmental and Amenity Analysis: sets out the outcomes of the site audit, and analyses the environmental and amenity impact of conversions.
  - Section 6: Options development: draws to together the findings from earlier section of the report and sets out the consultants' recommendations for taking forward the Council's policy approach, the section finishes with a conclusion.

## 2. Policy Context

- 2.1 This section identifies the policy context for the Council's existing approach to residential conversions and highlights the related national and regional planning policies and guidance. It also highlights opportunities to strengthen the existing framework.

### National Policy Context

- 2.2 Planning Policy Statement 3 (PPS3): Housing sets out the policy framework for delivering the Government's housing objectives. The Government's key objectives are to provide a choice of quality homes, improve affordability of homes and create sustainable, inclusive, mixed communities.
- 2.3 By implementing the PPS3 policy framework there are various outcomes that the Government seeks from the planning system. Three of these objectives are of particular relevance to this study, these include: creating high quality housing; creating a mix of housing; and a responsive supply of land for housing that makes efficient use of land including re-use of previously developed land.
- 2.4 In achieving high quality housing PPS3 identifies various matters that should be considered when assessing a proposed development such as: integrating and complementing neighbouring buildings and the local area in terms of scale, density, layout and access; and whether the development creates or enhances a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity.
- 2.5 A key characteristic of a mixed community is a variety of housing in terms of tenure and price and a mix of different households such as families with children, single person households and older people. Local planning authorities are advised that they should plan for the mix of housing that will be required for the plan period. In doing so they should consider the current and future demographic profile of the area, and the accommodation requirements of specific groups such as families with children, older and disabled people.
- 2.6 PPS3 specifically refers to conversions of existing housing as providing an important source of new housing.
- 2.7 In deciding which sites are suitable and for what type and intensity of development, planning authorities should ensure consistency with the policies in PPS1. In doing so planning authorities are advised to take into account the following:
- whether there is, or the potential for, a realistic choice of access by means other than the private car and for opportunities to service the site through sustainable transport;
  - the capacity of existing and potential infrastructure (including for water supply, sewage and sewerage, waste management and community infrastructure such as schools and hospitals) to service the site or area in ways consistent with cutting carbon dioxide emissions and successfully adapting to likely changes in the local climate;
  - the ability to build and sustain socially cohesive communities with appropriate community infrastructure, having regard to the full range of local impacts that could arise as a result of likely changes to the climate.

### Regional Policy Context

- 2.8 London Plan Consolidated with Changes (2008) sets out the spatial strategy for London to 2025/26. The key policies of relevance include Policy 3A.1 Increase London's Supply of Housing and Policy 3A.5 Housing Choice.
- 2.9 Minimum housing provision targets are set out in Policy 3A.1 and the Mayor and boroughs should promote policies that seek to achieve and exceed this target. The targets are for net additional

homes, and include additional dwellings provided through development and redevelopment, and conversions (subdivision) of residential properties and changes of use from non-residential properties.

- 2.10 Policy 3A.5 Housing Choice requires Boroughs to take steps to identify the full range of housing needs in their area. DPD policies should ensure: that a range of housing choices is offered; all new housing is built to Lifetime Homes Standards; and that ten per cent of new homes are wheelchair accessible or easily adaptable for wheelchair users.
- 2.11 *Housing space standards* (2006) was prepared by HATC Ltd for the GLA to inform the review of the London Plan. The report considers the issue of reductions in internal space standards in new dwellings, within both family and non family accommodation and that less family accommodation is being provided. These issues have implications for accessibility, sustainability and quality of life.
- 2.12 Although the London Plan sets general design principles (by requiring Lifetime Homes and wheelchair accessible units) it does not provide specific guidance on space standards. The report assesses the role and impact that space standards have had and may have in future and advises on possible incorporation of standards in the London Plan. The Report proposes a set of space standards, although these have not been incorporated into the London Plan at present.
- 2.13 The report identifies that in London during the period 1995-2005 the number of houses developed has dropped steadily from just over 50% to about 18% of all properties developed. In addition an increasing proportion of dwellings developed are 2 bed flats. The report identifies demographic trends that show London has a higher proportion of households made up of families than the UK as a whole, although it does acknowledge that London has a higher proportion of one person households than the UK as a whole.
- 2.14 The report concludes that from the information on dwelling trends and demographics there is a poor match between dwellings needs of the population and the accommodation being provided in private and housing association sectors.
- 2.15 The London Assembly Report *Size Matters – The Need for more family homes in London* (2006) addresses the issue of provision of family size homes in detail. The report primarily looks at the issue of housing affordability and the impact this can have on overcrowding.
- 2.16 The report identifies that a successful affordable housing policy not only achieves affordable housing but meets the needs of an area in terms of suitability. There is a surplus of one bedroom housing in every sector (market, intermediate and social) but there is a chronic shortage of three and four bed housing particularly in the social rented sector. This shortfall means people are living in overcrowded conditions, which has detrimental effects on family relationships, child development and health.
- 2.17 According to the report, the shortfall in affordable family homes is partly a result of how the Housing Corporation Grant system works, where funding is skewed towards smaller homes. The report considers the merits of using habitable rooms or floorspace standards as a way of encouraging more family units. Boroughs tend to use a mixture of these approaches in order to meet local needs.
- 2.18 Some Boroughs (although a minority) have used housing needs assessments to establish dwelling size and mix policies, and the report considers this to be a vital tool in achieving family units.

### **The London Housing Strategy**

- 2.19 According to the London Housing Strategy (Mayor of London, 2008), there is an unmet need for more family housing in London, as the failure to provide enough larger homes has led to an increase in overcrowding, by a third, since 1996/ 97. The report states that in 1997/ 98, 38% of social rented homes developed by housing associations had three or more bedrooms but this has halved to 19% in 2005/ 06, while overcrowding in private housing has doubled from 28,000 overcrowded households in 2000/ 01 to 59,000 in 2006/ 07.

- 2.20 This level of overcrowding has adverse affects on communities, facilities, families and individuals. The strategy has set a target for delivering 42% of social rented and 16% of intermediate homes to have three bedrooms or more. It aims to cease this increase in overcrowding by 2012 through direct investment from the Targeted Funding Stream and to support conversions and extensions producing larger homes.
- 2.21 The report considers mixed tenure developments to be essential in order to create mixed and balanced communities. Mono-tenure estates have left a legacy of deprivation in the past, creating a concentration of new social housing in areas that already have the highest amount of social rented homes, and market homes where there is little social rented housing.. The strategy suggests that providing varying tenures and types will create diversities in the local population and diminish the segregation of London's population by the tenure of their homes.
- 2.22 Sub-standard properties and inadequate management are highlighted in the London Housing Strategy as an unwelcome feature, mostly evident in the lower end of the private rented sector, which can have serious health and financial consequences to tenants, and can lead to anti-social behaviour and community fragmentation. The report stipulates that individual London Boroughs should lead the effort to tackle poor standards through legislation. Private developers are encouraged to adopt the standards set out in the London Housing Design Guide.
- 2.23 The report acknowledges that high density housing, which results from conversions, can be compatible with attractive design and desirable homes, given that open spaces are protected and sufficient facilities are provided. The report declares that new homes in the UK are some of the smallest in Europe (on average 76 sq.m), but emphasises that appropriate space standards are particularly important in higher density housing and conversion schemes. The report further emphasises that Councils must ensure that transport, social infrastructure and housing investment are aligned with the increase in density.
- 2.24 The downturn in the housing market has reduced the ability of developers to raise capital to fund new developments or bring forward new sites. The report identifies a pressing need for co-ordinated, creative and innovative approaches to ensure London delivers the homes it needs in an uncertain market. It highlights the potential of brown-field development and recommends the provision of new homes on existing housing estates.

## Local Policy Context

- 2.25 The London Borough of Lambeth UDP was adopted in August 2007, On adoption the UDP policies were automatically saved for three years under provisions set out in the Planning and Compulsory Purchase Act 2004. The Council is now in the process of preparing its LDF and once completed the saved policies will be replaced or superseded. There are several policies in the adopted UDP that are of relevance to this study these are discussed below.
- 2.26 Policy 15 sets out the Council's position on housing provision, this identifies a minimum housing provision of at least 20,500 (1400 pa) net additional dwellings between 2002 and 2016. Policy 15 clarifies the Council's intention is to retain and promote housing development where possible, ensuring a mix of dwelling, type, affordability and size while taking account of local circumstances and characteristics to meeting housing needs.
- 2.27 The paragraphs supporting Policy 15 set out the results from the Lambeth Housing Provision Survey which estimates how much housing will come from the four different sources of housing provision. It is estimated that 2,093 dwellings will come from small conversions during the period 2002 – 2016.
- 2.28 The Council recognises that conversion of houses to flats is a means of increasing dwelling numbers. The UDP encourages conversions where properties are large enough, the units created are satisfactory and a range of unit sizes are provided. Policy 17 Flat Conversions aims to protect



small purpose built family size housing and ensure an adequate standard of accommodation. The policy prohibits dwelling conversions where the dwelling is less than 120sq.m (pre-1948 un extended floor area) or where conversion of a listed building would have an effect on 'it's character as a building of special architectural or historic interest'. Where proposed developments meet these requirements there are various other restrictions on the nature of development including:

- Avoiding large extensions to increase habitable floorspace (where the primary purpose is increasing the number of units);
- A full mix of unit sizes should be provided, including, where a garden is available a family unit of 2 + bedrooms;
- Conversions should provide an acceptable standard and should not have a visual impact on the street;
- Policy 14 will apply when converting to two or more units in an area of parking stress.

- 2.29 Policy 14 sets out the Council's parking and traffic restraint policy. Lambeth Council uses parking control as a means of managing traffic and of restraining demand, assisting air quality and improving the environment in general. The key elements of the policy that are relevant to residential conversions are that provision of parking on street is allowed providing it doesn't impact on bus routes, carriageway widths and traffic management. However in many parts of the Borough Controlled Parking Zones (CPZ) have been introduced to manage the overwhelming demand for on street parking. As a result Policy 14 encourages car free development where development will be located in a Controlled Parking Zone (CPZ) in areas with high levels of public transport accessibility. *'In these areas, especially where there is already severe parking stress, or where there would be a significant increase in parking stress following development, development will be secured as car free (no on site parking) and/or permit free (where the eligibility of occupiers for Council parking permits is prohibited) and/or be part of/contribute towards a city car club'* (UDP Policy 14).
- 2.30 Supplementary Planning Document (SPD) Guidance on Standards for Housing Development and House Conversions provides further detailed guidance in particular on residential space standards and house conversions.
- 2.31 The SPD sets out various standards including minimum room sizes, the standards of most relevance to this study are overall minimum floor areas for new build, conversions and changes of use to residential. 1 bed (1-2 people), 45sq.m, 2 beds (3 persons) 60sq.m, 3 beds (4 persons) 70 sq.m, 4 bed (5 persons or more), 85sq.m. There is also a minimum standard of 37sq.m for 1 bed 1 person flats but this only applies to new build developments.
- 2.32 The guidance in the SPD on house conversions recognises that they can contribute to the creation of sustainable, liveable mixed communities and can make more effective use of urban land. However in some instances conversions can result in poor residential amenity for prospective occupiers and can harm amenity of neighbouring occupiers and it is this impact that the guidance seeks to avoid.
- 2.33 Over intensification can occur where extensions are required to meet the minimum floorspace sizes set out in the SPD resulting in inadequate accommodation, and potentially impacting on the character and amenity of an area through proliferation of rubbish/recycling bins, extra cars in front gardens, and a generally cluttered and untidy street. It is the cumulative affect of several over-intensive developments that can have a wide impact on amenity of an area. It is for these reasons that Policy 17 makes it clear that where large extensions would result in over-intensification permission will be refused.
- 2.34 The guidance clarifies that a mix of units should be provided and that where possible a family sized unit of two or more bedrooms (at least 60sq.m) should be included with direct access to a garden.

- 2.35 Original front gardens should be retained (policy 39). If on site parking is to be provided there should be a balance between the area of hardstanding and the amount of greenery retained.
- 2.36 Cycle parking and bin stores should not be positioned in sensitive locations, particularly if the conversion is in a conservation area or listed building, where possible they should be behind the building line or screened by landscaping.

### State of the Borough Report

2.37 Key facts:

- Ethnically diverse with growing Black African, Asian and ‘White Other’ population.
- Rapidly growing population, expected to reach 322,000 by 2026 (according to GLA projections).
- 118,000 households this is expected to increase by 23,000 (19%) by 2026 (according to GLA projections). The Borough has a higher proportion (10%) of lone parent families compared to the national and London averages. The GLA projects one person households to rise by 15,000 in the period 2006 and 2026 although ONS projects an increase in Co-habiting couples (by 8,000) in this period. Both ONS and GLA project married couple households to decrease in this period (the projections are 33% and 7% respectively).
- Compared to the rest of London the borough has a young population 45% 20-39 years old.
- Mixed socio-economic profile with areas of poverty and social exclusion, although there are a high proportion of young educated people often in professional roles.
- Health and wellbeing is improving although figures continue to be worse than the London average on many indicators.
- In terms of environmental well being, the quality of council housing stock is improving. Housing affordability is a key issue. The 2003 stock condition survey estimated that 11% of private sector dwellings in Lambeth are non decent compared to the national average of 4 %. The Housing Needs Update (2007) estimates that 22,462 of households in the Borough (18%) are living in unsuitable housing, with issues such as repairs, overcrowding, harassment, special needs and expense.
- The Borough on the whole is well served by public transport, however there are parts of the Borough, in particular Streatham and Norwood in the South of the Borough that have poor accessibility.
- Parks have been improving and are highly rated however there are issues related to street scene that are rated poorly such as graffiti, vandalism, dirt and litter. Lambeth residents also have concern about the Borough’s pavements (below national and London averages).

### Lambeth Housing Needs Assessment Update

- 2.38 The Lambeth Housing Needs assessment update was completed in 2008. There are various core outputs required from a Strategic Housing Market Assessment (SHMA) as set out in the SHMA Practice Guidance Note (August 2007). The most relevant output for this study is an estimate of size of affordable housing, and estimate of household groups which have particular housing requirements e.g. families.
- 2.39 Some of the information within the Housing Needs Assessment has been provided on the basis of three sub areas based on groups of wards<sup>1</sup>. This include: North comprising Bishop’s, Prince’s, Oval, Stockwell, Vassall, Larkhall, and Clapham Town; Central comprising Ferndale; Angel; Herne Hill, Tulse Hill, Town Hall, and Clapham Park; South comprising St Martin’s, Thurlow Park,

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<sup>1</sup> Wards correct at time of publication of Housing Needs Assessment, some have subsequently been replaced.

Knight's Hill, Gipsy Hill, Thornton, Streatham Hill, Streatham South, St Leonards, and Streatham Wells.

- 2.40 The housing need assessment identified an annual housing need of 8,003 (gross of supply). The assessment identifies the types of household in housing need: the mostly likely type of household in need are lone parent households and couples without children followed by families with children. Households with children are one of the groups that are more likely than average to be in housing need, there are 2,269 households with children that are in housing need, this is 28.4% of the total households in need.
- 2.41 When housing needs are considered by ethnicity, the Black African and White Other groups show a higher than average level of need. In the case of Black African households in need are almost twice the Borough average accounting for 17.3% of need in the Borough. 4,725 households headed by BME (including White Other) are in housing need, representing more than half of total need (59%).
- 2.42 In terms of size of affordable housing required there is a shortfall of all accommodation sizes. The largest shortfall is for 2 bed housing. Although total need for 3 and 4 bed units is lower than for 1 and 2 bed the shortage relative to supply of housing is greatest for 3 and 4 bed units where only 27% and 17% of need respectively can be met.
- 2.43 Within priority groups (pensioner households, households with children, households with special/support needs) the estimate of need by size differs, with the majority of requirements now for 3 bed units (66%).
- 2.44 The South sub area has the largest shortfall although the level of need is strong in every area. South has the greatest shortfall of supply with only 25% of need that can be met.
- 2.45 Overcrowding of housing was assessed by considering the number of bedrooms required against the number of bedrooms in a property. There are currently 6.5% of households (8,220 households) that are overcrowded. This is consistent with the figure for Greater London. Two thirds of over crowding is in households with children. In total 18.7% of households with children were overcrowded. The majority of overcrowding (83.6%) is among BME groups. 18% of Black African households are overcrowded, Asians have the highest level of overcrowding with 26.5% of such households overcrowded, although the Asian population is fairly small in Lambeth. Overcrowding is not evenly spread throughout the Borough with nearly half of all overcrowded households in the North sub area.
- 2.46 The implications of the Borough's housing needs are set out in the report. The outputs from the assessment would suggest that a larger proportion of 3 and 4 bed homes may be required (53% of the total). Around half of the additional affordable homes should be larger (family) sized accommodation. The range of properties required in the affordable sector need to skew future provision towards larger (3 and 4 bed) family accommodation to ensure those in most acute need can be housed and communities can become mixed. The relevance of this for the study is that it highlights the importance of the need for larger affordable family accommodation to meet needs.

## Review of London Borough Conversion Policies

- 2.47 This section reviews the residential conversion policies that other London Boroughs have, in order to identify and compare the varying approaches to residential conversions. This selection of London Boroughs was based on work previously undertaken by the Council and was supplemented with additional Borough case studies.

### **Barnet (UDP adopted May 2006)**

- 2.48 Barnet identifies that conversions provide important contributions to the housing supply, in particular small units, which are in short supply, and states that they are a sustainable and

effective use of brown-field land. However, the Council is aware of the adverse affects and pressures conversions can have on an area. Policy H23 allows conversion of single dwellings into flats, provided “the development has an acceptable impact on the amenity” of the local area.

- 2.49 Acceptable locations in the borough for conversions include areas in or adjacent to town centre, easily accessible to public transport or areas characterised by non-family units. On roads characterised by houses in single family occupation, conversions would normally not be considered appropriate by the council, as these areas meet the needs of larger housing and balance the housing provided in town centres.
- 2.50 The standards of noise pollution in party walls between neighbouring houses are not normally improved. Consequently, living rooms and kitchens of converted flats should be located as adjacent as is practical to similar rooms in the neighbouring property, to minimise noise disturbance to their bedrooms.
- 2.51 Policy H26 specifies the design elements of conversions. They must be designed to have a minimal impact on the amenities of neighbours; this most likely relates to noise pollution. Converted houses must have a usable rear garden of more than 50 sq.m and enclosed refuse storage areas should be provided to the rear of the property. Proposals must provide adequate and properly located parking provision, retaining as much front garden as is practical. Barnet does not provide floor space or other specific thresholds on conversions.
- 2.52 Extensions to dwellings are constrained by the general requirement to protect and enhance the character of the area and respect the amenities of neighbouring occupiers. Proposals for residential conversions must not involve large extensions or alterations to roofs which are deemed unacceptable in terms of their appearance.

**Brent (UDP adopted January 2004)**

- 2.53 The justification to Policy H17; Flat Conversions, states that Brent has always taken a positive approach to flat conversions and has encouraged conversion of suitable property unless it leads to dangerous on-street parking or excessive forecourt parking.
- 2.54 On heavily parked streets it is stated that there is clear evidence that intensive conversions generate additional on-street parking pressure and this causes difficulties for emergency services. Therefore Brent requires 140 sq.m of floor space for conversions in heavily parked streets or CPZ areas. Where such on-street parking is unacceptable then the number of units permitted in the resultant scheme will be restricted to a maximum of one unit per 75m of the original floor area the property possesses.
- 2.55 The Council’s approach is described in the preamble to UDP Policy H19:  
*‘The Borough has operated a regular overnight parking survey, measuring the percentage of cars parking on-street of the safe and legal maximum level of parking. At over 80% safe two-way flow is hindered and is classified as ‘heavily parked’. Streets cease to be defined as ‘heavily’ parked only after they fail to meet the relevant criteria for two consecutive years. Streets in excess of 400m in length are considered in separate blocks. The justification for an overnight parking survey is that this is the best measure of the difficulty of parking for residents and means that on-street parking by shoppers, commuters, employees etc. do not affect the survey figures.’*

**Camden (UDP adopted June 2006)**

- 2.56 Camden does not have a specific policy on conversions, but they are referred to in a positive way within the general Policy H8; Mix of Units. It is identified that conversions make an important contribution towards meeting the need to increase the supply of new housing in the borough. They are required to retain at least one unit with 3 or more bedrooms for families.

**Croydon (UDP adopted July 2006)**

- 2.57 Policy H7; Conversions, stresses that converted properties must be self-contained and sufficient, with adequate facilities and access. The threshold for conversions is 130 gross sq.m or 6

habitable rooms. Policy H7 further considers the loss of needed small family housing and the impact of the conversion, either in itself or cumulatively, on the environment or amenities of the surrounding area.

- 2.58 The Inspector recommended that the harm to the residential environment is a policy matter and should not be restricted to justification. The Inspector also recommended that the justification should explain the potential effects which might harm the residential area. The Council is committed to preparing an early LDD for residential development as part of the LDS and any conversion proposal is expected to have regard to the guidance in the LDD once it is adopted.

### **Greenwich (UDP adopted July 2006)**

- 2.59 Conversions are permitted where the original premises is greater than 130 sq.m, the surrounding area and buildings are not adversely affected and on-street parking does not aggravate the safety and free flow of traffic and pedestrians (Policy H5).
- 2.60 Policy H6 states that sound insulation should be installed to alleviate the problems of noise between neighbouring dwellings and both sound insulation and ventilation treatment should be used on noise sensitive facades to mitigate road and railway noise. Adequate access to dustbins must be provided.
- 2.61 Policy H6 provides guidance on design issues. Each unit must be self contained and, if family housing is provided, it must be provided on the ground floor with direct access to a garden. Policy H11 suggests a minimum garden area of 50sq.m provided for family housing. The Council recognises that there may be a scope for a lower level of private garden space in locations adjacent to public open space or on conversion schemes.
- 2.62 Extensions are limited to an appropriate size and are subject to the design Policies D9 and D10, whereby the amenity of the area must not be harmed. Greenwich Council wishes to exercise discretion in allowing extension. This is most likely to prevent extensions occurring under permitted development rights so that they may be converted into smaller units. The policy may be relaxed to provide a person with a disability more space in their home (H20).
- 2.63 The council expect conversion development to achieve a high quality of housing design and environment and not have detrimental affects on landscape, noise pollution or the privacy of adjoining occupiers (H7). Sensitive design and layout is promoted to in developments vulnerable to noise and vibration (E3).
- 2.64 The Council aims to achieve higher densities at places with good public transport accessibility, to ensure the best sustainable use of land. A "Public Transport Accessibility Level" (PTAL) score is used to assess public transport accessibility, i.e. a PTAL of 4 is good accessibility while a PTAL of 6 is high accessibility. Areas with high PTAL have a lower demand for private transport. The Council wants to therefore concentrate conversions at areas with high PTAL, as parking pressures will be low.

### **Hackney (UDP adopted June 1995 - policies saved until September 2007)**

- 2.65 The Council considers it essential to maintain single family dwellings and accommodation suitable for children. It has set a threshold of 120 sq.m for conversions and the provision of at least one three or more bedroom unit with access to a garden. Substantial properties (larger than 180 sq.m) to be converted, should provide larger units for larger families (Policy HO12). This policy allows sub-division to small units in schemes as well as the provision of at least one large dwelling. Conversions must not deteriorate residential amenities, e.g. traffic and parking congestion.
- 2.66 The borough has a need to maintain accommodation for its larger households (eight or more persons) wherever possible and this will hinder conversion schemes in certain buildings and areas. Extensions to provide more floor space, and hence units, for a conversion scheme will normally not be permitted (Policy HO13). The Council has also identified Renewal Areas, where

conversions will conflict with the Council's objectives in meeting the needs of local residents and will be rejected.

- 2.67 The Council recognises that the overdevelopment of premises for the primary purpose of providing additional units, rather than the improvement and enhancement of dwelling living space, through the erection of large extensions or adaptation of non-habitable floor or roof space, may be unacceptably detrimental to both existing residential amenities and the character of the area's townscape. The Council considers a density of 250 habitable rooms per hectare to be acceptable (Policy HO9).

### **Hammersmith and Fulham (UDP amended March 2007)**

- 2.68 The three criteria in Policy HO3 are that house conversions will not be permitted where:

- There is inadequate on- or off-street parking available to meet parking needs;
- The net floor space is less than 120 sq.m; or
- Only self-contained bedsits/1 person flats are provided.

- 2.69 These criteria ensure that conversion developments provide a mix of dwelling types which are of appropriate standard.

- 2.70 The Council suggests undertaking an on-street overnight parking test to determine whether the parking demands of a conversion proposal exceed the notional on-street overnight parking capacity. Streets which are more likely to have permission granted for conversion should have 10% free notional on-street overnight parking capacity, to reduce parking pressures, and should not be an access road with an essential through-traffic function in the short to medium term (Policy S8.2). By applying this policy, the Council ensures that there is a capacity for parking and that main roads are not disturbed by inadequate parking provision which result from the increased density.

### **Haringey (UDP adopted July 2006)**

- 2.71 Following the publication of the Inspector's Report, minor changes were made to the wording of Policy HSG10; Restricted Conversion Areas, however the general emphasis remains the same. The policy restricts additional conversions in specifically identified areas where the majority of properties have been converted and are now experiencing parking stress, which in turn impacts on the effective operation of bus services.
- 2.72 The policy also restricts conversions in street where 20% of properties have already been converted or are HMOs. The policy received no objections during the UDP Inquiry and the Inspector was satisfied with the Council's reasoning to retain family homes and minimise parking impacts.
- 2.73 Haringey's guidance, SPG3a; Sustainable Urban Design Standards: Residential Urban Design, provides general advice on density, dwelling mix, floor space minima, conversions, extensions and Lifetime Homes. These are quite detailed and include such measurements as the number of units expected from specific initial floor spaces, minimum floor width (2.13m) and minimum floor to ceiling heights (2.3m).
- 2.74 Where family dwellings are created through conversions, a private garden of minimum 50 sq.m must be provided. Where a family dwelling cannot be located on the ground floor or the basement, an individual private or communal garden at a minimum 25 sq.m for each unit should be provided.
- 2.75 Haringey stipulate that all new residential development must provide separate storage space and recycling space amounting to no less than 7.5% of the required minimum floor space. This condition acts as an indicator of overdevelopment and ensures that, should overdevelopment occur, storage for waste is provided.

### **Islington (UDP adopted June 2002)**

- 2.76 Islington is in favour of conversion development, to help increase the housing stock and provide greater variety of dwelling types and sizes. Conversions are supported where the gross floor area is over 120 sq.m, there is adequate ground floor storage for refuse and the property does not compromise a HMO (Policy H8).
- 2.77 Converted units must be of an adequate size, shape and disposition of rooms i.e. living rooms will not be permitted above or beside the bedrooms of other units. Additional soundproofing and energy conservation measures should be incorporated in the proposal, where appropriate (Policy H8).
- 2.78 Policy H9 sets thresholds on the floor space to ensure specific dwelling types are delivered to the borough through conversions. Where a property is between 120 sq.m and 150 sq.m, at least one unit should comprise of two bedrooms or more. Properties in excess of 150 sq.m should provide at least one unit with three bedrooms or more. This unit should occupy the lower floors and any basement. Exceptionally, this unit may occupy the upper floors, but in all cases there should be direct access to a garden, at ground level or via an exclusive stairway not more than one floor in height.
- 2.79 The garden area should be a minimum of 60 sq.m, or consistent with other gardens in the immediate area. Policy H9 states that living rooms will not be permitted above or beside bedrooms of other units within a converted property to reduce adverse affects of noise pollution. The council recognises that parking pressures may increase as a result of conversion and will permit a maximum off-street parking provision of up to 0.5 spaces per dwelling for conversions with limited or no on-site parking potential (Policy T22).

### **Kensington and Chelsea (UDP amended September 2007)**

- 2.80 The Council is aware of the drawbacks of conversion development; such as loss of family housing, loss of low cost housing, lack of privacy, inadequate noise insulation, parking pressures. However, it acknowledges that dwellings provided by conversion can be beneficial in providing additional housing, given that they meet the needs of the Boroughs permanent residents.
- 2.81 Conversion development must not result in unacceptable on-street parking levels (defined as exceeding 90% of the legal available space) or the loss of family dwellings of five habitable rooms or less with direct access to amenity space (Policy H6). Larger units suitable for family occupation must be located on the lower floors with access to the garden.
- 2.82 There must be a sufficiently wide range of dwelling types in conversion schemes and the Council emphasises that developers must ensure there are adequate local community infrastructure provisions (schools, shops, open space) to accommodate the increase in density.

### **Lewisham (UDP adopted July 2004)**

- 2.83 Lewisham Borough Council refers to conversions as a significant source of additional dwellings. Policy HSG 9 allows conversion of houses with a floor space of over 130 sq.m, and at least one family unit to be provided. The policy also aims to retain the current level of “short term relatively low cost accommodation” (e.g. HMOs).

### **Southwark (The Southwark Plan adopted July 2007)**

- 2.84 Southwark has no specific conversion policy, but instead focuses on the provision of mix types of dwellings. Through Policy 4.3; Mix of Dwellings, the Council is attempting to ensure conversions to do not lead to an abundance of small units. Developments have a 5% threshold for studio flats, as they are not suitable for meeting affordable housing needs. The majority of units in a development must have two or more bedrooms.
- 2.85 The Council takes a holistic approach to conversions and focuses instead on the densities of certain areas (Policy 4.1):
- Central Activity Zone: 650 to 1100 habitable rooms/hectare;

- Urban Zone – Medium density: 200 to 700 habitable rooms/hectare in areas with predominantly four or more storeys and a public transport accessibility level of 4 to 6;
- Urban Zone - Lower density: 200 to 450 habitable rooms/hectare in areas with predominantly two to three storeys and a public transport accessibility level of 2 to 3.
- Suburban Zone: 200 to 350 habitable rooms/hectare; and
- Public Transport Accessibility Zones: may exceed 700 habitable rooms/hectare if the development provides;
  - An exemplary standard of design, with an excellent standard of living accommodation; and
  - A significant contribution to environmental improvements in the area, particularly relating to public transport/ cycle/ pedestrian movement, safety and security and public realm improvements.

2.86 Policy 4.3 also states that permission will not be granted for residential conversion if the original net internal floor space is 130 sq.m or less.

**Tower Hamlets (UDP adopted 1998)**

2.87 Policy HSG12 does not allow conversions of houses up to and including three storeys suitable for single family use, unless there is a local need for smaller units. Conversion of houses with four or five storeys is normally allowed.

**Wandsworth (UDP adopted August 2003)**

2.88 Wandsworth seeks to adopt a balanced approach to conversions. The Council recognises that conversions play an important role in increasing the number and variety of dwellings available.

2.89 The existing Wandsworth UDP policy on Housing Conversion (H5 to H8) permits the creation of new dwellings by conversion for properties with a floor space greater than 120 sq.m, provided there are no adverse effects. In areas designated as House Conversion Restraint Areas (HCRA), the threshold is increased to 150 sq.m of floor space. Each unit should be on average 75 sq.m in size or have adequate off-street parking.

2.90 Conversion activity has been increasing in Wandsworth, the Borough’s Housing Conversions Analysis report (2008) identifies trends of conversion development in the Borough. Table 2.1 sets out a summary of conversion applications by type and decision.

**Table 2.1 – Wandsworth Conversion Applications, April 2004 – November 2007**

Conversion Type	No. Applications	% Approved
	1 <sup>st</sup> April 2004 to 30 <sup>th</sup> November 2007	1 <sup>st</sup> April 2004 to 30 <sup>th</sup> November 2007
House to flat conversions	296	74%
Flat to house conversions	101	100%
Subdivision of flats creating more units	298	73%
Amalgamation of flats reducing number of units	26	100%

Source: Wandsworth Borough Council, Planning and Transportation Overview and Scrutiny Committee –January 2009

2.91 The Council has received isolated complaints about house conversions regarding the effect on the character of an area and its impact on on-street parking. There is also a perception that in some cases houses are extended to a point where their floor space meets the conversion thresholds, prior to their conversion.



- 2.92 Wandsworth's Overview and Scrutiny Committee report considered three policy approach options for the future management of residential conversions, for inclusion in the emerging Development Control Policies DPD. The recommended option (Option 2) applies a borough wide minimum threshold of 150 sq.m, exclusive of extensions, whether implemented via permitted development rights or planning permission. Additional wording will clarify what types of locations are considered less suitable for families.
- 2.93 Concern has been expressed that developers are currently taking advantage of a loophole in the UDP policies on conversion, whereby they first apply for extensions to a dwelling to increase the overall floor space to above the 120 sq.m and subsequently apply for permission to convert it.
- 2.94 Although the evidence does not suggest a considerable number of applicants taking advantage of this loophole, the revised General Permitted Development Order (GPDO) amends the restrictions relating to permitted extensions, and could have significant impacts on proposals of this in the future. The Council have recommended that any further policy controlling conversions exclude extensions from the calculation of habitable floor space. This policy can be implemented by reviewing the site history, when assessing applications for conversions, to identify whether a property has been subject to prior extensions.

### **Westminster (UDP adopted January 2007)**

- 2.95 There is no specific policy on conversion. Policy H3 encourages the provision of additional housing and deems the conversion of office use into permanent housing in the Central Activities Zone (CAZ) to be generally acceptable. Temporary conversions of this nature are discouraged as they do not contribute to a permanent increase in the Borough's housing stock. Outside the CAZ, the Council considers housing the preferred use on all sites in aim of maximising the housing stock.
- 2.96 The Council considers the cumulative effect of conversions to be a damaging factor to the residential amenity due to the loss of family housing and the increased pressure for on street parking. There is a concern that the average household size in the Borough is 1.92 persons, compared to 2.35 in Greater London. Policy H5 aims to attract more families into Westminster by requiring that 33% of housing development to be family-sized and 5% of this family housing to have 5 or more habitable rooms.

### **Summary of Policy Approaches**

- 2.97 Although several Boroughs recognise conversions as an important contribution to the housing supply, they are aware of potentially negative effects on the environment and local amenities. Barnet, Hackney and Wandsworth counteract this by having specific policies which state that conversions simply must not result in adverse effects. Croydon is preparing an LDD for residential development, to provide more specific guidance on conversion development and to further ensure that adverse effects are minimised and mitigated.
- 2.98 A few Boroughs have identified the need for conversions to be self-contained. However, several Boroughs express a greater concern over the loss of family housing and the establishment of family based neighbourhoods. Tower Hamlets limits conversion to single occupation houses over three stories (Policy HSG12). Westminster considers conversions to be detrimental to family housing and residential amenity. Although the Council has no specific policy regarding conversion, it aims to secure family housing by requiring that 33% of housing development should be family-sized housing and that 5% of this should have five or more habitable rooms.
- 2.99 Barnet, Greenwich, Southwark and Wandsworth prefer conversions to exist in high density areas, such as town centres or places with high PTAL scores. These specific areas are deemed less suitable for family housing and can therefore hold conversions and their externalities. Other councils have taken a restrictive approach. Hackney has identified sites where large households must be maintained, and "Renewal Areas" that exclude conversion developments. Wandsworth has implemented its HCRA, in which the threshold for conversions is increased from 120 sq.m to

150 sq.m. In Haringey, conversions are not permitted in areas where a concentration of conversion already exists or where HMOs are over 20%.

- 2.100 Another common concern is excessive parking which can result from an increase in population density. Overcrowded parking causes disturbances for emergency services and public transport operating in the area. Brent, Kensington & Chelsea and Hammersmith & Fulham conduct overnight surveys to measure the percentage of on-street parking to determine the levels of overcrowded parking. Brent Borough states that 80% is the maximum capacity permissible, while Kensington & Chelsea and Hammersmith and Fulham consider 90% to be the maximum. Islington permits 0.5 parking space off-site where a converted property has limited or no on-site parking potential.
- 2.101 Some councils demand that at least one of the converted properties has private access to a garden area of minimum 50 sq.m. The minimum provision of private garden in Islington is 60 sq.m. Greenwich is flexible on its 50 sq.m benchmark, provided the property is adjacent to public open space. Although most Boroughs mention that conversion developments must have sufficient storage for the increase in waste produced, Haringey Council's SPG 3a states that an additional 7.5% of the habitable floor space must be provided as separate storage and recycling space. This is to ensure that waste and storage provisions are linked to an increase in residential units and population.
- 2.102 The majority of the boroughs reviewed in the above section apply a floor space threshold for conversions. This threshold ranges between 140sq.m and 120sq.m. Croydon defines its threshold as 130sq.m or six habitable rooms. Hackney, Islington and Lewisham require that at least one of the properties provided must be a family unit i.e. have a minimum number of bedrooms. Haringey's SPG 3a identifies what type of unit is expected from varying original net internal areas of properties. Greenwich and Hackney have recognised that there is a trend in which properties are extended to reach the specified thresholds, in order to convert these properties later. Wandsworth recommends tackling this issue by excluding past extensions from the calculation of habitable floor space.

## Conversion Appeals: Lambeth and Other Boroughs

- 2.103 The following section examines appeals made against refusals on conversion applications throughout the London boroughs, including Lambeth. A COMPASS search was conducted to identify all appeal cases regarding the conversion of residential properties between 2004 and 2008<sup>2</sup>. The results of this search provide an insight into the different approaches councils hold towards conversions. The results may also reveal the effectiveness of the conversion policies of each borough. It should be noted that Lambeth Council's Uniform database identifies a greater number of appeals relating to flat conversions than the COMPASS search, however, the compass search has been carried out on a consistent basis across London Boroughs and therefore provides a way of comparing the situation in Lambeth with other London Boroughs.
- 2.104 The COMPASS search revealed which boroughs have refused the most conversion applications, as well as their justifications for refusal. Coupled with the conversion policy review above, this provides further understanding of the approaches different London boroughs have taken towards conversion development.
- 2.105 Between 2004 and 2008 Lambeth Borough Council had 19 appeals against conversion application decisions. This comprised of 24% of the total amount of conversion appeals made in the London boroughs during this period.

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<sup>2</sup> The Compass search keywords included subdivision of houses to flats in London and loss of family housing.

Table 2.2 – Conversion Appeals in the London Boroughs, 2004 – 2008

Borough	Number Appeals	% of Total
Lambeth	19	24
Other Boroughs	59	76
Total	78	100

Source: COMPASS search results, January 2009

2.106 A majority of 63% of appeals were dismissed in Lambeth during this period, whereas the other London boroughs saw 55% of appeal cases dismissed. The fact that approximately two thirds of the appeals in Lambeth were dismissed by Inspectors shows a considerable amount of support for Lambeth’s existing conversion policy. For both Lambeth Borough Council and the other boroughs, 37% of appeal cases were allowed.

Figure 2.1 – Conversion Appeals, Lambeth Borough

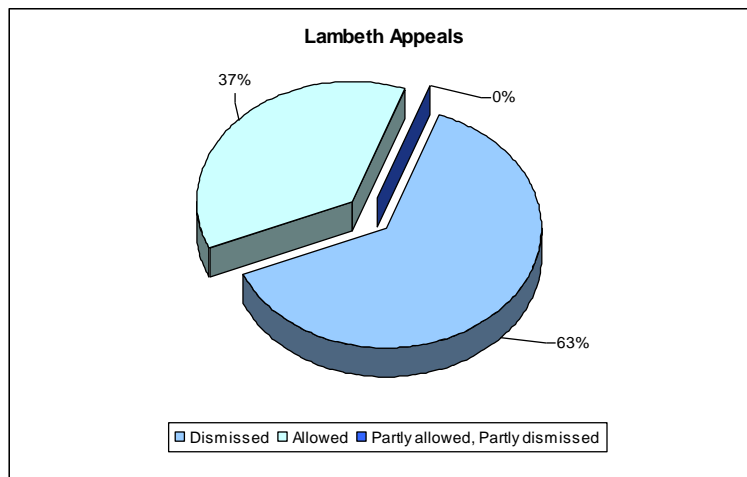
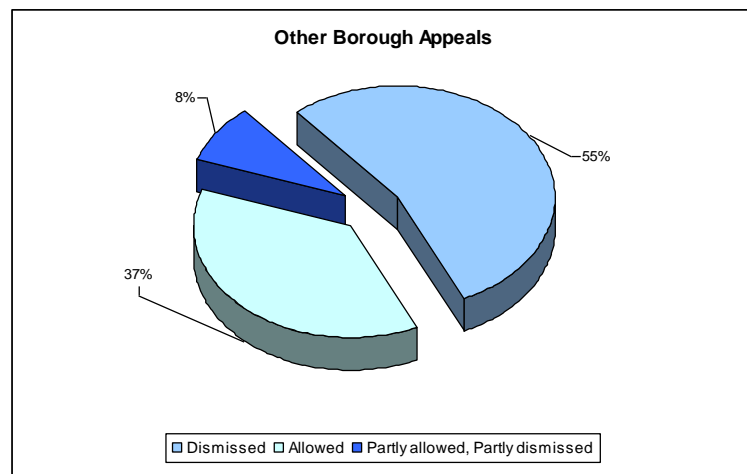
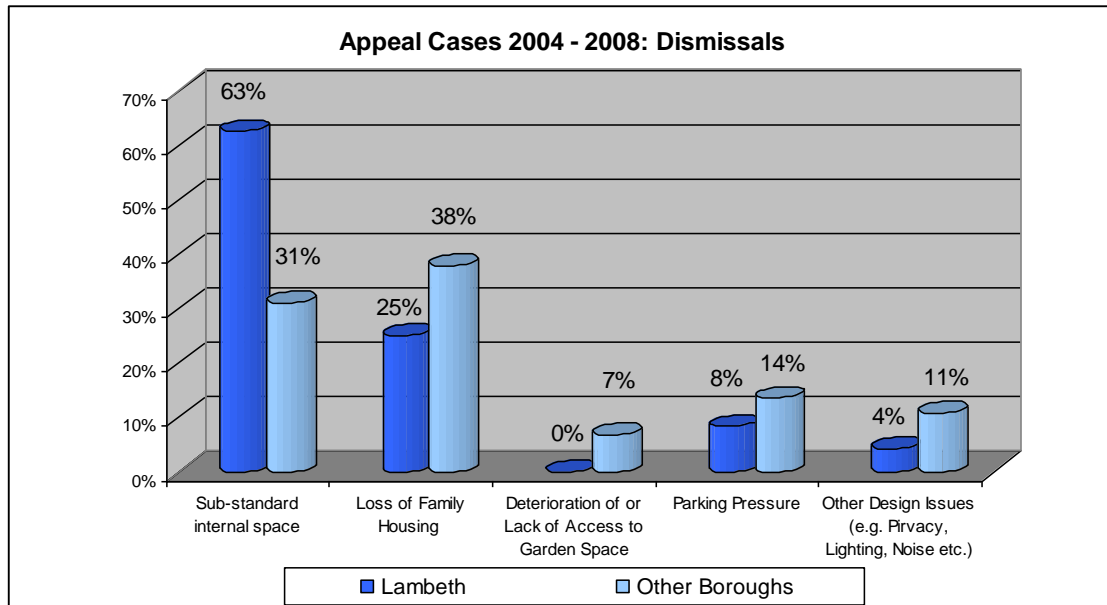


Figure 2.2 – Conversion Appeals, Other Boroughs



- 2.107 It is important to examine the appeal cases which were dismissed and determine the reasons for dismissal given by the Planning Inspectorate to indicate the weight given to specific conversion policies/criteria in Lambeth and the other boroughs. Figure 2.3 compares the reasons for dismissal of conversion scheme appeals between Lambeth and the other London boroughs.
- 2.108 According to the COMPASS search, the three reasons most cited for dismissing conversion appeals for all of the London boroughs, including Lambeth, were a sub-standard original internal floor space, a loss of family housing and an anticipated increase to parking pressures.
- 2.109 The volume of these figures reflects the significance of each specific conversion policy. It is apparent that, for all London boroughs, the aforementioned three most cited reasons for dismissal are regarded as the most critical topics when dealing with conversion applications. In Lambeth, a large majority of appeals were dismissed due to the inadequate space standards, indicating that this is an important issue in conversion schemes for Lambeth Borough Council and that the existing policy may need to be revisited and strengthened.

Figure 2.3 – Reasons for Conversion Appeal Dismissals, 2004 - 2008



**Policy Criteria and Appeals**

- 2.110 Further analysis of the data on conversion policies and appeals from the other London boroughs reveals:
  - The number of conversion policy criteria each Council has; and
  - Which conversion criteria are most common.
- 2.111 Not all Councils examined in this report have policies specifically regarding conversion development. An analysis of the exact amount of conversion policies of each council would therefore not accurately reflect their approach to conversions. Each council does however provide criteria for conversions to ensure such development is of an appropriate standard and does not have adverse effects.
- 2.112 A review of the development plans of the 15 boroughs in the previous section revealed that the Councils with the highest amount of policies specific to residential conversions are Hackney, Greenwich, Haringey and Islington. Camden and Tower Hamlets have the fewest. The specific policy criteria, which are most common amongst the Councils examined in this report, are specified in the Table 2.3.

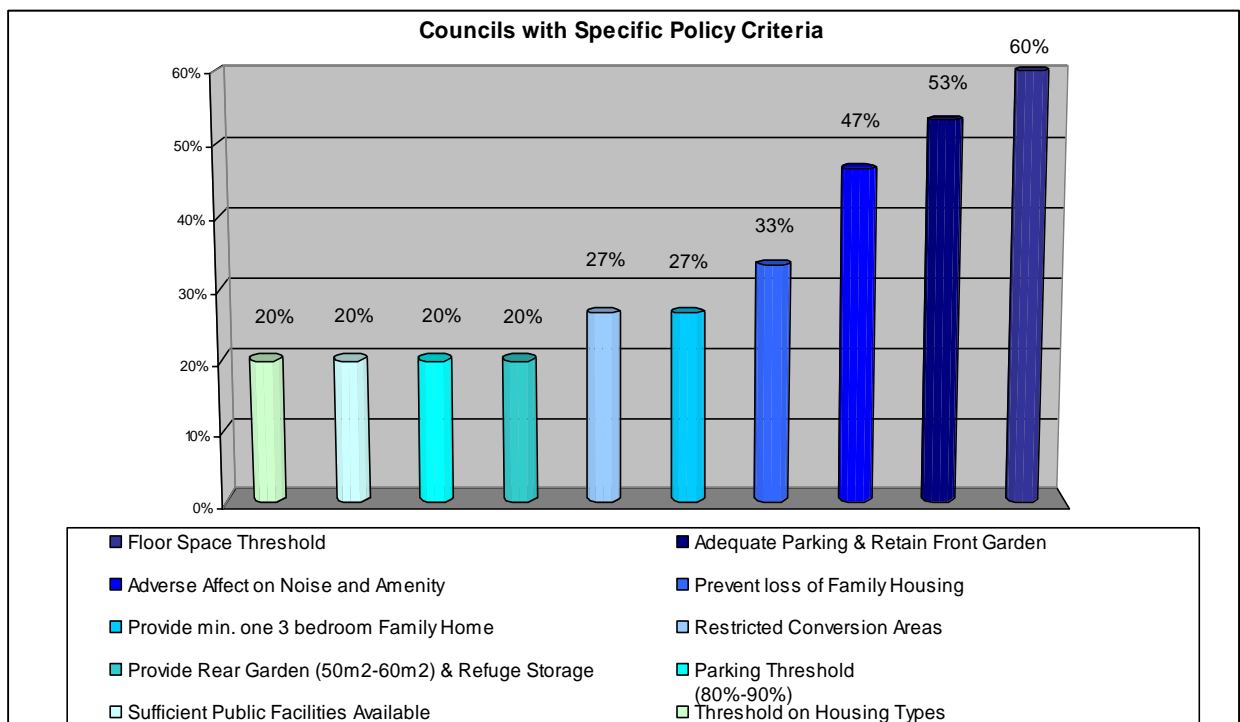
Table 2.3 – Conversion Policy Criteria

Policy Criteria	Number of Councils with Criteria
Floor Space Threshold	9
Adequate Parking & Retain Front Garden	8
Adverse Affect on Noise and Amenity	7
Prevent loss of Family Housing	5
Provide min. one 3 bedroom Family Home	4
Restricted Conversion Areas	4
Provide Rear Garden (50 sq.m -60 sq.m) & Refuge Storage	3
Parking Threshold (80%-90%)	3
Sufficient Public Facilities Available	3
% Threshold on Housing Types	3

2.113 The most common policy criteria in conversion policies are floor space thresholds, adequate parking provision (with the retention of front gardens) and the prevention of any adverse affects on residential amenity, respectively. Policy criteria preventing the loss of family housing are also quite common throughout the boroughs. The most common criteria in the above table correspond to the main reasons for dismissal of the appeals made during 2004 – 2008 (see Figure 2.3).

2.114 Criteria which are less common stipulate the provision of rear gardens and adequate refuge storage, particular parking thresholds, sufficient access to public facilities and percentage thresholds on housing types. Figure 2.4 shows the proportion of the Councils which incorporate the above criteria in their statutory documents.

Figure 2.4 – Councils with Specific Policy Criteria



2.115 The COMPASS search provided the number of appeals made against refused conversion development applications between 2004 and 2008 throughout the London Boroughs. However,

this number of appeals does not portray the total amount of conversion applications submitted or refused during this period. The total number of appeals dismissed per Council, between 2004 and 2008, are provided in the Table 2.4.

2.116

**Table 2.4 – Total Appeals Dismissed per Council, 2004 – 2008**

London Borough	Total Appeals 2004 - 2008
Haringey	8
Greenwich	6
Brent	5
Croydon	4
Barnet	4
Wandsworth	3
Hackney	3
Southwark	2
Islington	1
Hammersmith & Fulham	1
Westminster	0
Tower Hamlets	0
Lewisham	0
Kensington & Chelsea	0
Camden	0

2.117 Besides Lambeth Borough’s 19 appeals, the Councils with the most appeals made against their decisions are Haringey, Greenwich, Brent, Croydon and Barnet. The Councils with the least appeals made against them (in this case, zero) are Westminster, Tower Hamlets, Lewisham, Kensington & Chelsea and Camden.

2.118 During 2004 and 2008, 24% of appeals made against refusals on applications for conversions in London were in Lambeth Council. This was twice as much as Haringey Council, which had the highest number of conversion application appeals amongst the other boroughs. Furthermore, Inspectors subsequently dismissed 63% of the appeals in Lambeth.

2.119 Lambeth Council’s UDP (Adopted August 2007) clearly states that conversions will be permitted where the original pre-1948 floor space is ‘at least 120sq.m’ (Policy 17; Flat Conversions). However, according to the COMPASS data, a large majority of dismissed appeals in Lambeth were due to the original internal areas being below the 120sq.m threshold or sub-standard residential floor space resulting from proposed conversions. This suggests there is support for the existing threshold.

**Appeals Allowed**

2.120 Between 2004 and 2008, 28 of the appeals made against conversion applications were allowed. In most cases, the Inspector found that the applications for conversions met the relevant policies and considered that permitting the developments would not lead to adverse effects on the building or the surrounding environment.

2.121 However, some of the appeals were successful despite the application being contrary to certain aspects of policy. For example, eight of these appeals (29%) had an original floor space which was below the permitted threshold for conversion, but were permitted because the Inspector noted other benefits that would arise from the development. There were a few proposals that have led to a loss of family housing, but in each case the benefits of the specific conversion developments outweighed this. Eight of the appeal cases involved dwellings which had been extended, increasing the floor space, prior to applying for a conversion. This point was not challenged however, as the extensions were legal under the General Permitted Development Order prior to December 2008.

- 2.122 According to the COMPASS search result, the reasons given by PINS, in support of allowing appeals for conversions, in London during 2004-2008, were:
- There was no harm to residential amenity or neighbourhood character;
  - The conversion would not lead to increased activity in the area;
  - The development was located in a “sustainable” (i.e. an area with good transport links);
  - The proposed layout and stacking of the rooms was deemed acceptable (some proposals needed to include sound attenuation features);
  - The need for 1 bedroom units was found to be as important as the need for large family housing; and
  - Certain Councils did not provide sufficient proof for the need of family housing in the area.
- 2.123 The main justifications noted for allowing the appeals were:
- The converted units contributed to the housing stock; and
  - There was a demonstrated need for smaller units in the area.
- 2.124 In an appeal case in Hackney (DCS Ref: 032-973-861, June 2004), the original size of the property and its existing amenity space was considered inadequate for family housing. In this case, the Inspector concluded that it was not considered a significant loss to family housing stock if converting the property would lead to the loss of an inadequate family house. The approach in Hackney highlights that houses proposed for conversion should be of a decent standard in order to be viewed as a loss.
- 2.125 In Bromley (DCS Ref: 100-052-167, September 2008) the Council’s policy objective is to resist the loss of dwellings to maintain an adequate mix of properties in certain areas. However, in this case the Inspector stated that the Council did not explain how the housing mix compared with the demand for different housing types or whether the mix of types in the area of the appeal site was typical of the Borough as a whole. The appellant stated that there was a considerable demand for flatted accommodation and, in the absence of evidence to the contrary, this was taken into consideration by the Inspector, who subsequently ruled in favour of the appellant. This case reveals that conversions have been allowed, in un-restricted areas, on the basis that there is a need to diversify the housing stock. Furthermore, empirical evidence must be provided on the existing or lack of demand for smaller properties.
- 2.126 In Lambeth, four of the permitted appeals (66%) were in residential suburban areas. In these cases, the Inspector found that need for smaller housing in these specific areas outweighed the loss of family housing. This was due to concentration of family housing in the areas, with typically lower densities on the periphery of town centres, and was further supported by policies that aim to ensure areas have a mix of residential unit types. In one case (DCS Ref: 100-0440991) the Inspector stated that the conversion would not harm the stock of family housing and that there was a need for a “more efficient use of land”.

### Appeals Summary

- 2.127 Between 2004 and 2008, 63% of the conversion application appeals in Lambeth were dismissed. This reflects strong support for the existing policy in the borough. The COMPASS results revealed that the most common conversion policies held by the boroughs examined were regarding floor space thresholds, adequate parking provision, preventing adverse affects and the loss of family housing.
- 2.128 The majority of dismissed appeals in Lambeth were due to inadequate floor space provisions. To ensure that conversion applications propose adequate residential space, ensure that conversion applications propose adequate residential space, Lambeth should retain a minimum or average

size for converted residential units, as well as the property size threshold for conversion within the policy.

- 2.129 Some of the appeals that were allowed based on the benefits of the proposed conversion outweighing the reasons for refusal of the application. The two most common justifications for allowing appeals were that they would provide a contribution to the housing stock and that there was a need for smaller units and flats in the area.

### Section Summary

- 2.130 This section has identified that housing conversions are recognised in National and Regional Policy as a means of meeting housing targets but that this should not be at the cost of maintaining balanced and sustainable communities and that the new units should be of a satisfactory standard for future occupiers. It has also been identified that there is a recognised need for family housing, particularly affordable, but also market housing.
- 2.131 The review of other London borough policy approaches identifies that generally boroughs recognise conversions as a valuable source of housing supply but that the scale of conversion needs to be regulated in order to avoid adverse impacts of conversions. These policies largely fell into the following categories:
- Policies that identify areas suitable for conversion;
  - Policies that identify areas unsuitable for conversion;
  - Policies that impose a minimum threshold for conversion; or
  - A combination of the three.
- 2.132 The policies set criteria for accepting conversions in principle as well as the other requirements that make development acceptable including:
- Internal space standards;
  - Car parking Standards;
  - Family sized unit at ground floor level.
- 2.133 A COMPASS search of appeals has shown that certain aspects of these policies fared better at appeals than others. Lambeth's policy was tested at more appeals than any other borough and also had the highest percentage of appeals dismissed.
- 2.134 However, although the existing policy has clearly had some success in restricting unacceptable conversions, there are opportunities to strengthen the existing policy framework by adopting some of the policy approaches employed by other boroughs. This could include increasing the minimum floor area requirement for properties to be converted, by identifying specific areas suitable for conversion, by identifying specific areas unsuitable for conversion or a combination of the above.



## 3. Sub Areas and Identification of Cluster Activity

### Introduction

- 3.1 This section provides an overview of the housing stock in Borough, recent completions. The section sets out how the Consultants have split the Borough into sub areas for the purpose of analysis and the approach that has been taken to identifying parts of the Borough that have concentrations of recent residential conversion activity and those areas that in future could have potential for further conversion activity.

### Sub Areas

- 3.2 In order to establish the street audit sample sub areas have been derived (see Section 5 for sample frame and audit methodology). The sub areas have also been used to inform policy recommendations and summarise the findings of the assessment.
- 3.3 In defining appropriate sub areas we have used the Council's existing ward boundaries as the building blocks for this process. Wards have been grouped together geographically into seven sub areas as follows:
- Sub Area A - Bishops, Prince's, Oval;
  - Sub Area B - Vassall, Coldharbour, Herne Hill;
  - Sub Area C - Stockwell, Larkhall, Ferndale;
  - Sub Area D - Clapham Town, Clapham Common, Thornton;
  - Sub Area E - Brixton Hill, Tulse Hill, Streatham Hill;
  - Sub Area F - St Leonards, Streatham Wells, Streatham South; and
  - Sub Area G - Thurlow Park, Knights Hill, Gipsy Hill.
- 3.4 These sub areas are identified on Figure 3.1.

### Summary of Conversion activity

- 3.5 The Valuation Office Agency (VOA) provided data for all streets within the Borough, a total of 1,450 as at 1<sup>st</sup> April 2008. Data was provided on a street by street basis, rather than at property level for reasons of data protection. The data provided for each street includes the following:
- Total number of properties;
  - Total number of unconverted houses or bungalows;
  - Total number purpose built flat or maisonette;
  - Total number flat or maisonette in converted domestic property;
  - Total number flat or maisonette in converted commercial property;
  - Unconverted houses and bungalows, broken down by number of bedrooms; and
  - Unconverted houses and bungalows, broken down by size of unit (sq.m).
- 3.6 Table 3.1 shows that there are 128,666 properties in the Borough. The most common property type are purpose built flats and maisonettes of which there are 62,154 in the Borough accounting for 48% of all properties in the Borough. There are 29,950 flats within converted domestic properties and there are 33,149 properties (houses or bungalows) that are unconverted (only 26% of properties).

**Table 3.1 – Property types in Lambeth**

Type of Property	No. Properties	%
Unconverted house or bungalow	33,149	26
Purpose built flat or maisonette	62,154	48
Flat or maisonette in converted domestic property	29,550	23
Flat or maisonette in converted commercial property	2,313	2
Other property types	1,500	1
<b>Total</b>	<b>128,666</b>	<b>100</b>

- 3.7 The VOA provided data on the size of unconverted properties. There are currently 16,090 unconverted properties that are below the 120 sq.m policy threshold, this accounts for 49% of unconverted properties. This means that there are approximately 16,289 properties (13% of all properties in the Borough) that are of a size and type that could be converted in future.

**Table 3.2 – Size (sq.m) of unconverted houses or bungalows**

Size of Property	No. Properties	% All unconverted properties	% all unconverted properties >120 sq.m
Less than 120 sq.m	16,090	49	N/A
120 – 150 sq.m	6,769	20	40
150 – 175 sq.m	4,254	13	25
175 – 200 sq.m	2,331	7	14
Over 200 sq.m	2,935	9	17
Area Unknown	785	2	5
<b>Total</b>	<b>33,164</b>	<b>100</b>	<b>100</b>

Source: VOA (April 2008). N.B total properties does not equal the total unconverted properties in Table 3.1 as VOA for reasons of data protection amalgamate data sets for some streets where less than 5 properties are in one category.

- 3.8 Table 3.3 shows residential completions data for the period 2005 – 2009. This shows that over this period the net gain in residential units through conversions has been increasing, both in total and as a proportion of all units completed. Flat Conversion make up approximately a third of all residential units completed.

**Table 3.3 – Completions by development type**

Year	New Build		Flat Conversions		Change of Use		Totals	
	Net Units	% of total	Net Units	% of total	Net Units	% of total	Net Units	% of total
2005/06	729	63%	269	24%	153	13%	1151	100%
2006/07	684	61%	337	30%	106	9%	1127	100%
2007/08	526	44%	367	30%	314	26%	1207	100%
2008/09	722	66%	216	20%	157	14%	1095	100%

Year	New Build		Flat Conversions		Change of Use		Totals	
	Net Units	% of total	Net Units	% of total	Net Units	% of total	Net Units	% of total
Total	2661	58%	1189	26%	730	16%	4580	100%

Source: London Borough of Lambeth Development Pipeline Report (2008/09)

- 3.9 The Council's conversion policy approach seeks to maintain a supply of family sized units (two or more bedrooms). The VOA data groups dwellings of one and two bedrooms, however it does provide data for the number of 3, 4 and 5+ bed dwellings. Table 3.4 shows that the majority of unconverted houses (82%) are 3 bed dwellings or more and are therefore family sized with 3 beds representing half of the total.

**Table 3.4 – Size (no. beds) of unconverted houses or bungalows**

No. bedrooms	No. Units	%
1 or 2 bed	3,698	14
3 bed	13,130	50
4 bed	5,135	19
5 + bed	3,447	13
Bedrooms unknown	1,045	4
<b>Total</b>	<b>26,454</b>	<b>100</b>

Source: VOA (April 2008). N.B total properties doesn't equal the total unconverted properties in Table 3.1 as VOA for reasons of data protection amalgamate data sets for some streets where less than 5 properties are in one category.

- 3.10 Analysis of Council completions data for 2008/9 identifies that of the 1,275 units completed (gross) the large majority (86%) were small units one or two beds, 37% were one bed units, 49% were two bed units, 10% were three bed units and 4% were four or more bed units. The majority of conversions that were completed in 2008/9 were two bed units (55%) whilst three bed units only made up 3% of all flat units, and four bed units only 0.63%. The units sizes coming forward in flat conversions are smaller than those for other building types which have a higher percentage of three bed units coming forward, 11% of new build units were three bed and 5% of units coming from change of use were three bed.
- 3.11 The VOA data identified 1,450 streets in Lambeth. Table 3.5 shows that 688 (46%) of Lambeth streets have converted properties in the street. Of the 668 streets that have flats in a converted property approximately one third have less than 20% of the properties converted, whilst 23% have 20 - 40% of properties converted. However although the majority of streets have few or no conversions, there are 298 streets (20% of all streets) with over 40% of properties converted.

**Table 3.5 – Percentage of Properties Converted**

% of properties converted	No. Streets	% of all Lambeth Streets	% of streets with Conversions
0	782	54	N/A
<20	218	15	33
20 to 40	152	10	23
40 to 60	127	9	19
60 to 80	109	8	16
80 to 100	62	4	9
<b>Total</b>	<b>1,450</b>	<b>100</b>	<b>100</b>

Source: Valuation Office Data (1<sup>st</sup> April 2008)

3.12 The number of dwellings that are ‘capable’ of conversion (by virtue of their size) is considered by assessing the proportion of properties in a street that could be converted (i.e the properties are over 120 sq.m threshold set out in UDP Policy 17). Table 3.6 shows that 81% of streets have some dwellings capable of conversion, with some 21% of streets with 81 to 100 of properties that could be converted. It is important to note that this is simply an assessment of the proportion of properties in a street that unconverted houses or bungalows, more detailed assessment of future conversion activity is provided below.

**Table 3.6 – Dwellings Capable of Conversion**

% of dwellings with capability for conversion	No. Streets	% of all streets
0	275	19
<20	299	21
21 to 40	258	18
41 to 60	182	13
61 to 80	126	9
81 to 100	310	21
<b>Total</b>	<b>1,450</b>	<b>100</b>

Source: Valuation Office Data (1<sup>st</sup> April 2008)

### Approach to identifying residential conversion

3.13 The VOA did not provide data on how many houses there were in a street originally prior to conversion. Therefore, in order to establish existing clusters of conversions the consultants assessed the number of flats in converted properties in a street as a percentage of all properties that could be converted, by virtue of the fact they are a house as opposed to a purpose built flat. It is important to note that this method does not identify the number of family sized dwellings lost to conversion but effectively identifies the level of conversion activity on a street. This involved the following steps:

- **Step 1** – Add total houses to total number of flats in a converted property.
- **Step 2** – Calculate percentage of flats as a percentage of properties in a street that could be converted. By dividing the existing number of flats in converted properties by total properties (Step 1) x 100.

3.14 The Consultants then considered properties which are over the 120 sq.m policy threshold. As those properties under the 120 sq.m threshold are not capable of conversion (as they fail to meet policy requirements):

- **Step 3** – Sum of all unconverted properties over 120 sq.m;
- **Step 4** – Calculate percentage of properties that are over the 120 sq.m threshold. By dividing all unconverted properties over 120 sq.m by total number of properties in a street x 100.

3.15 As an example, if the above steps are followed for a street with 8 purpose built flats, 92 houses and 8 flats in converted properties, 8% of properties are flats in converted properties ( $8 \div 100 \times 100 = 8\%$ ). There are 40 houses over the 120 sq.m threshold in the street (Step 3), by following step 4 ( $40 \div 108 \times 100$ ) 37% of properties are over the 120 sq.m threshold.

3.16 Table 3.7 compares the percentage of flats as a percentage of properties in a street that could be converted (Steps 1-2 above) compared against the percentage of properties over 120 sq.m in a street (Steps 3 - 4 above). The Consultants excluded those streets where 100% of properties are purpose built flats/maisonettes (244 streets were excluded). The percentage of properties converted are shown from the top to the bottom of table 3.7 in increments of 10%, whilst the percentage of unconverted properties (in a street) that are over 120 sq.m is shown left to right in increments of 10%.

3.17 Table 3.7 shows the following:

- **Streets shown in the top left corner** of the table are those with the least conversion activity to date and the lowest potential conversion activity in the future (i.e. there are 380 streets where 0 -10% of properties have been converted and only 0 -10% of properties in the street are over the 120 sq.m threshold).
- **Streets in the bottom left corner** of the table are those where the greatest proportion of conversion activity has taken place to date (i.e. there are 62 streets where 91 – 100% of properties have been converted and only 0 – 10% of remaining properties are over the 120 sq.m threshold).
- **Streets in the top right corner** of table have had some conversion activity but are capable of further conversions (i.e. there are 40 streets where 0 -10% of properties have been converted and 90 -100% of properties in the street are over the 120 sq.m threshold)

Table 3.7 – Conversion Potential of Streets

	Percentage of Properties >120sq.m as Percentage of Total Properties (No. of Streets)										
		0 – 10%	11 – 20%	21 – 30%	31 – 40%	41 - 50%	51 - 60%	61 - 70%	71 – 80%	81 – 90%	91 – 100%
Percentage of Flats as Percentage of Properties that Could be Converted	0 to 10%	380	53	30	18	32	16	8	10	6	40
	11 to 20%	19	8	6	10	5	7	2	4	2	0
	21 to 30%	15	9	8	7	5	9	6	7	0	0
	31 to 40%	10	13	5	8	6	10	8	0	0	0
	41 to 50%	15	13	6	7	11	10	0	0	0	0
	51 to 60%	14	12	16	18	15	0	0	0	0	0
	61 to 70%	16	13	23	24	0	0	0	0	0	0
	71 to 80%	23	31	22	0	0	0	0	0	0	0
	81 to 90%	46	27	0	0	0	0	0	0	0	0
	91 to 100%	62	0	0	0	0	0	0	0	0	0

Source: Valuation Office Data (1<sup>st</sup> April 2008) Note this table includes 1,206 streets and discounts those where there is not potential (mainly social housing estates).

## Classification of Streets

- 3.18 Streets were classified so that the clusters of residential conversions could be identified. Each street has been classified according to the percentage of residential conversions within the street and the future potential conversion activity (as set out in Table 3.7). Streets where under 50% of properties have been converted, are considered to have had limited conversion activity to date, however it is important to identify those streets where more residential conversions could take place in future. Therefore streets where there have been under 50% of properties converted, but, over 50% of unconverted properties are over the 120 sq.m threshold are identified as being areas capable of future conversion. It should be noted that this does not mean these areas are ‘suited’ to further conversion activity or that they are preferred locations for further conversion activity it is simply identifying that these streets have seen limited conversions to date but the houses within these streets are over the 120 sq/m threshold and therefore are ‘capable’ of being converted in future.
- 3.19 Those streets where over 50% of properties have been converted are identified as having a high level of conversion activity, however in order to test the impact of conversions on a range of environmental and other indicators it is necessary to split this group in 10% increments.
- 3.20 Streets have therefore been classified into seven groups as follows:

- **Limited Conversion activity and limited future potential** - less than 50% of properties converted and less than 50% of unconverted properties over 120sq.m;
- **Areas capable of further conversion** - less than 50% properties converted but over 50% of unconverted properties over 120sq.m;
- **51 - 60% of properties converted;**
- **61 - 70% of properties converted;**
- **71 - 80% of properties converted;**
- **81 - 90% of properties converted;** and
- **91 – 100% of properties converted.**

3.21 Table 3.7 has been colour coded to identify the above street types and the same colour coding has been used in Figure 3.2 which shows the residential conversion street types.

3.22 The Consultants carried out an analysis of the environmental impacts of residential conversions based on the above street types using survey proforma attached at Appendix A.

### Classification of clusters

3.23 Although Figure 3.2 is useful in identifying how much conversion activity there has been in individual streets to date, it is difficult to use Figure 3.2 for identification of clusters of residential conversion activity. Identifying clusters of residential conversion activity is important to assist with analysis of the impacts of conversions (see Section 5). Therefore the Consultants have identified clusters of conversion activity by grouping streets according to the census output area that they are located in.

3.24 Each output area in the Borough was classified according to the proportion of residential conversions, output areas were classified by the dominant street type using the street classification in paragraph 3.20, where no one street type dominated output areas were classified as 'mixed'.

3.25 Figure 3.3 identifies clusters of conversion activity. The north of the Borough has a greater concentration of conversion activity, however there are clusters of conversion activity throughout the Borough. In general the clusters of conversions are in areas near to tube or railway stations. The greatest concentrations of conversion activity are in Brixton and Stockwell, however the south of the Borough also has some large concentrations of conversions in Streatham Hill and Streatham. There are also smaller clusters of conversion activity in Kennington, Tulse Hill, Norwood and in Nine Elms.

### Section Summary

3.26 This section identifies that a high proportion (71%) of housing in Lambeth is made up of either purpose built flats or flats in converted properties. It identifies that 26% of the housing stock is made up of unconverted houses or bungalows and that approximately half of these (16,289) are above the 120sq.m threshold currently contained in Policy 17 of the UDP and that 23% of existing properties are in a converted domestic property.

3.27 The above information demonstrates that overall Lambeth has a low proportion of unconverted houses and bungalows and that 49% of these are eligible for conversion under the current policy approach. The section also highlights the scale of conversions (26% of completion in the years 2005/06 to 2008/09 were conversions).

3.28 This section has identified the areas with the most potential for further conversion and the areas with the most conversion activity to date. Streets have been classified by the level of residential conversion activity in order to assess the degree to which residential conversion has an impact on environmental quality and amenity.



## 4. Socio-Economic Profiling

- 4.1 This section aims to identify the social and demographic characteristics of the housing conversion clusters. The social indicators used were sourced from the 2001 Census Data via the Office for National Statistics (ONS) and were provided at output and super output levels.
- 4.2 The classification of output areas is described in Section 3 (paragraph 3.24 and Figure 3.3). Once the Output Areas were classified, the ONS data was analysed to assess their different social profiles. The objective is to examine any correlation between certain social profiles and the level of housing conversions in an area and to identify what differences exist between areas with conversions and the Borough as a whole.
- 4.3 After reviewing different social and demographic indicators, the following indicators were selected and examined at super output or output area level:
- Housing type;
  - Population density per hectare;
  - Household types;
  - Ethnicity;
  - Occupancy/overcrowding;
  - Migration/community turnover rates;
  - Car ownership levels; and
  - Index of Multiple Deprivation (IMD).

### Housing Types

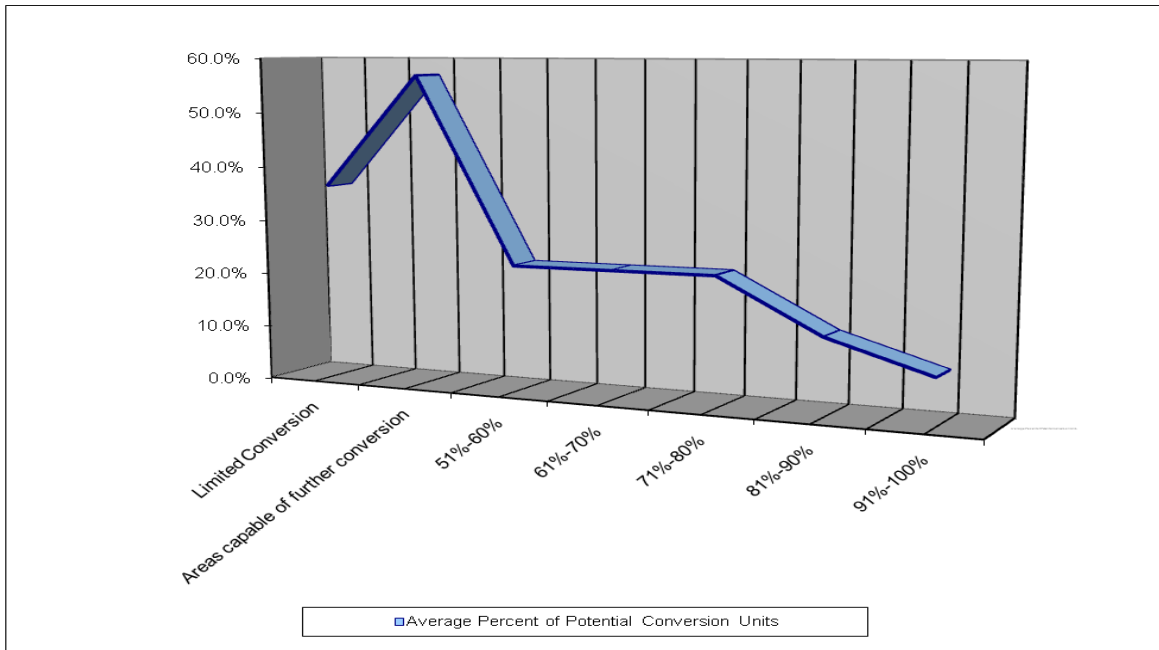
- 4.4 The 2001 Census provides a breakdown of the different housing types throughout the Borough at an output area (OA) level. As each OA was classified by its dominant street type group, it was possible to examine what type of housing was common to each street type.
- 4.5 Data on houses that could potentially be converted<sup>3</sup> was extracted from the dataset to highlight the capacity each OA has for more conversions. The Census data does not provide an indication of the size of the housing (and therefore whether it is over the 120 sq.m policy threshold) but it is a useful exercise to verify and further support the methodology used for classifying the streets and OAs in Section 3 of this report. As would be expected, Figure 4.1 shows that those OAs with higher levels of residential conversion activity have fewer houses and therefore less potential for further conversion in future. The census data shows that OAs classified as 'areas capable of further conversion' have the highest average number of properties with potential for conversion (57%), whilst OAs classified as 91-100% converted have the lowest average number of properties with potential for conversion (8%).

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<sup>3</sup> Those classified in the Censuses as unshared dwelling house or bungalow (detached), unshared dwelling house or bungalow (semi - detached), unshared dwelling house or bungalow (terraced).



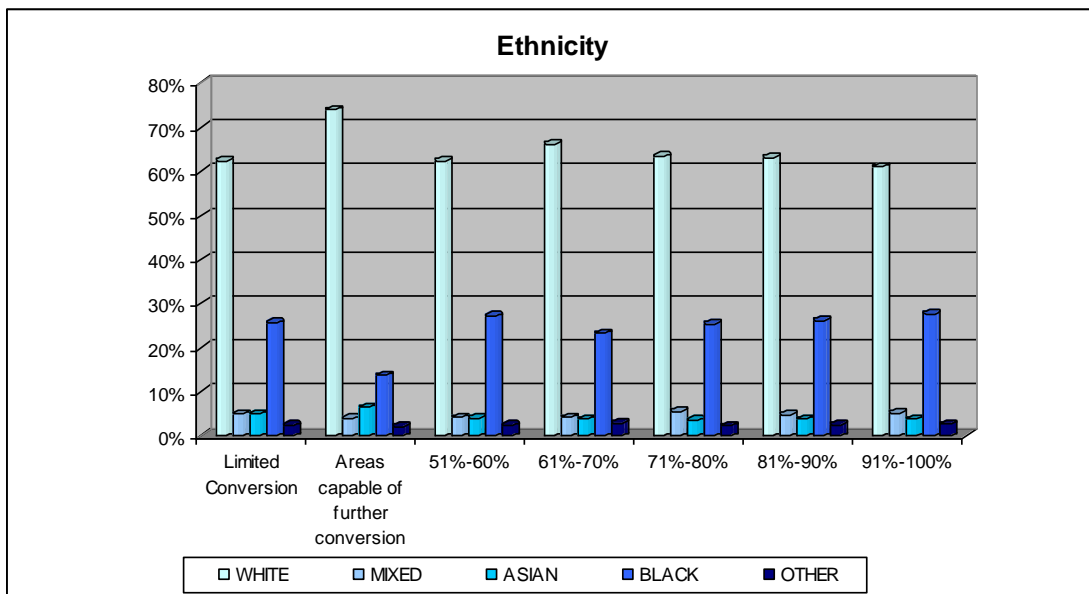
Figure 4.1 - Potential for further residential conversions



## Ethnicity

4.6 The 2001 dataset on ethnicity was examined in order to determine whether there was a link between certain ethnic groups and the concentration of converted residential properties. According to the 2001 Census, the proportions of ethnic groups were very similar throughout the Borough and the classification groups (Figure 4.2). This illustrates that there is no apparent connection between specific ethnic groups in an area and the level of conversions.

Figure 4.2 - Ethnicity and Conversions

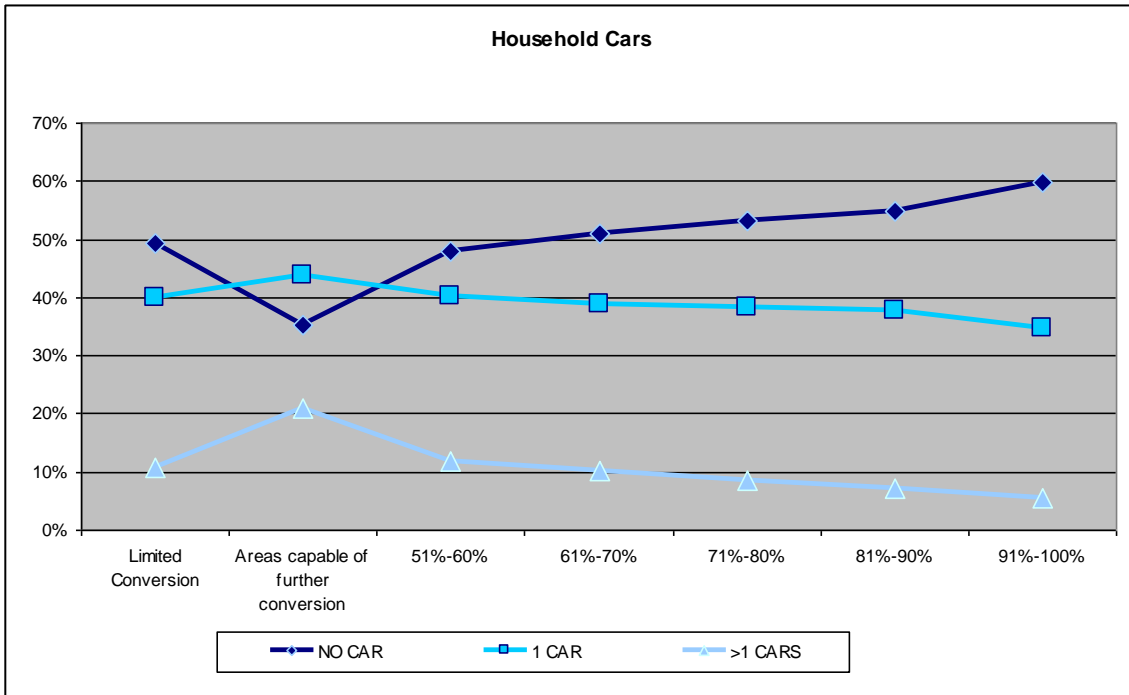


## Car Ownership per Household

4.7 Several boroughs state that parking pressures and congested roads are a common negative externality of conversions and have therefore developed guidance on the permitted thresholds for parking capacity (see Section 2: Policy Context). The 2001 Census on car ownership was

examined to determine the relationship between the level of conversions in an OA and the number of cars per household.

Figure 4.3 - Car Ownership



- 4.8 According to the census data, areas with a higher concentration of conversions have fewer cars per household than areas with limited conversions and areas capable of future conversions. The majority of households in OAs with a conversion rate over 60% have no cars. Moreover, households with more than one car are more likely to be in OAs with limited or potential for conversions (a conversion rate of less than 50%), as ownership of a single or multiple cars declines steadily after this benchmark.
- 4.9 The findings from Figure 4.3 contradict perceptions that there is an increase in total car ownership and parking pressures in highly converted areas. However, the dataset used above portrays the amount of cars owned per household in an OA. Although individual households in highly converted areas may have fewer cars than areas with limited or potential conversions, these areas have a higher household and residential population density due to their levels of conversion. As the density and conversion concentration increases, the cumulative effects of car ownership are likely to create more strain on the immediate infrastructure than in places with low density housing.

### Population Densities

- 4.10 The census data on population density was examined to establish the link between the level of conversions and the amount of people in an OA. Figure 4.4 shows the average population density (persons per hectare) for each of the OA types.

Figure 4.4 – Gross Population Densities

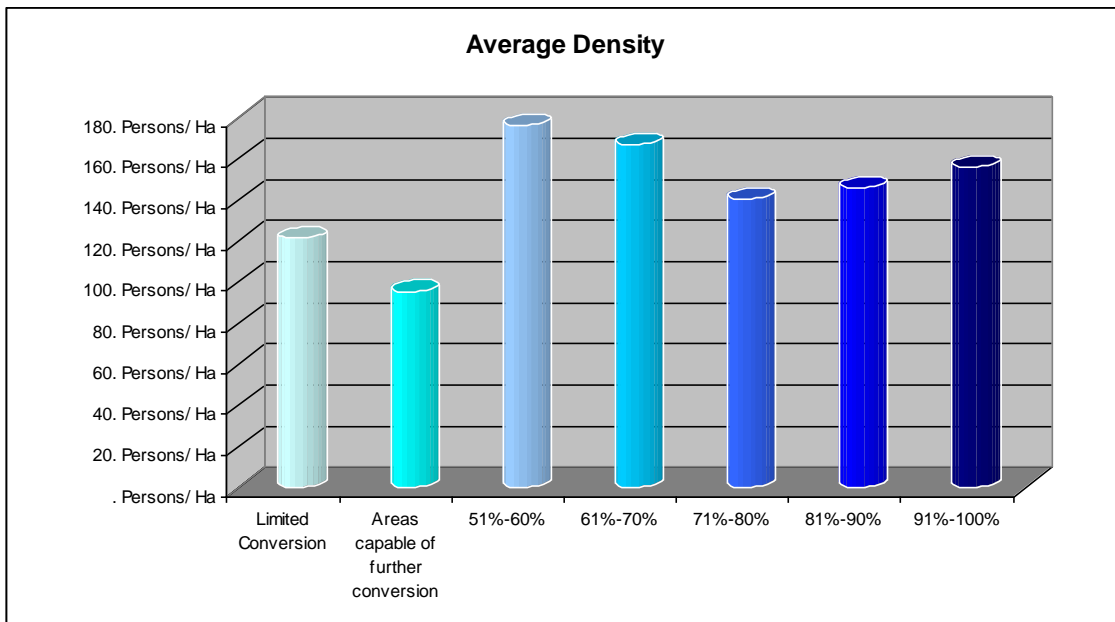
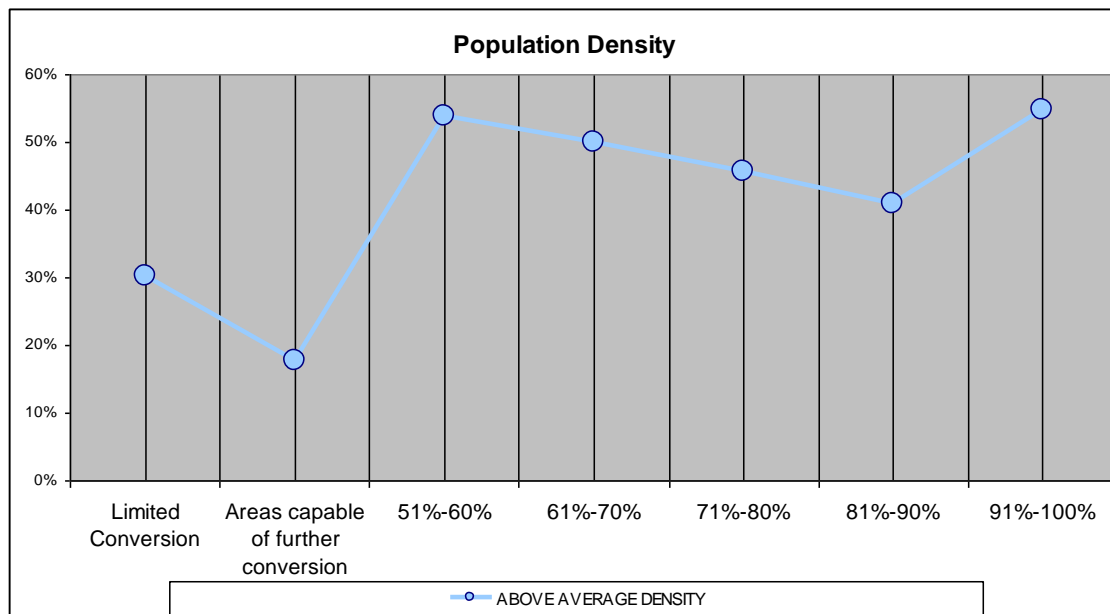


Figure 4.5 - Population Densities Above Borough Average



4.11 The 2001 data on population density reveals a clear connection between higher population densities and high conversion levels. Figure 4.4 portrays the average densities for each OA classification and it is evident that the average population densities increase with the level of conversion in an area.

4.12 The average population density of Lambeth Borough in 2001 was 136.8 persons per hectare. Figure 4.5 shows that only 30-15% of households in OAs with limited conversions or areas capable of further conversions have a population density which is above the Borough average. Furthermore, approximately half of all OAs with a conversion rate of over 51% have a population density over the Borough average.

4.13 The socio-economic indicators selected for profiling the Borough are shown in Figures 4.6, 4.8 – 4.11 and 4.13. The profiling maps OAs with each OA colour coded according to its classification.

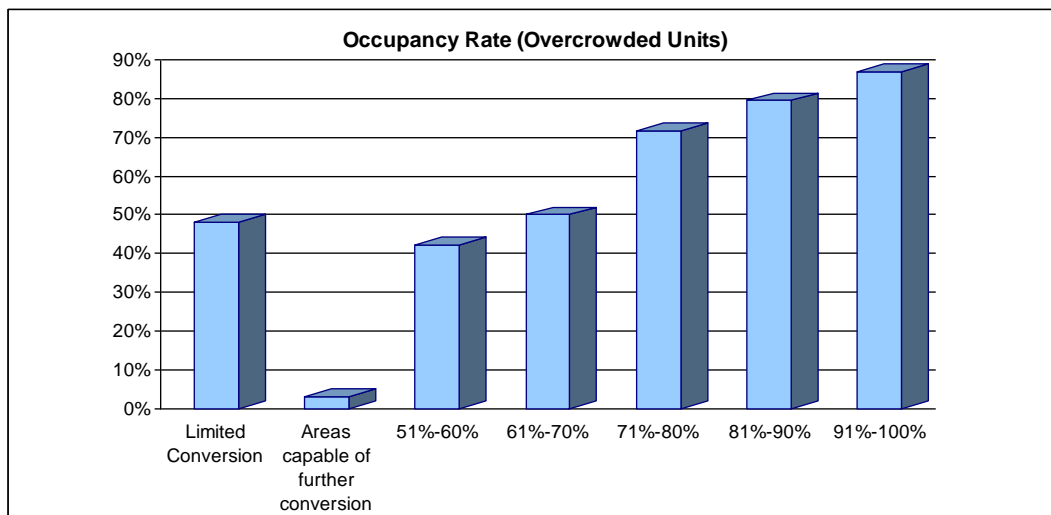
The classification colour coding is split into three shades to reflect the intensity of the social indicator in each OA.

- 4.14 Figure 4.6 shows the location of the OA types and their levels of population density. Figure 4.6 shows that, overall the Borough does not have an issue of very high population density reflected by the proportion of the Borough represented by medium or light shaded areas. Areas with higher population densities (over 181 persons per Hectare) are clustered together, in dark shading, along Clapham Road, through Vassal Ward and Larkhall Ward. The dominating colours in this elongated cluster are dark red, dark brown and dark orange, which correspond to OAs with at least 71% of properties converted.
- 4.15 Areas with higher population densities in an area generally require increased levels of infrastructure provision and amenities to support greater numbers of people. The analysis suggests that areas with higher levels of conversions coincide with areas of the highest population density and, therefore, will need to provide greater level of services and infrastructure to support the greater level of population.

### Overcrowding / Occupancy Rate

- 4.16 Overcrowding within residential units has negative effects on the quality of life of residents. To quantify overcrowding of an OA, the ONS occupancy rating was analysed which varies between +2 and -2. The Occupancy Rating provides a measure of under-occupancy and over-crowding, e.g. a value of -1 implies that there is one room too few and that there is overcrowding in the household. It relates the actual number of rooms to the number of rooms required by the members of the household. Ratings of -1 and -2 were grouped together to show the average % of households within each conversions category living in overcrowded accommodation (see Figure 4.7).

Figure 4.6 - Occupancy Rate (Overcrowded Units)



- 4.17 Figure 4.7 clearly shows there is a positive correlation OAs with greater concentrations of conversions and the proportion of households living in overcrowded accommodation. Converted properties are more likely to experience overcrowding the one reason may be linked to the greater level of private rented accommodation which is found within OAs with housing conversions. This is supported by the Council’s Housing Needs Update 2008 which identified private and social rented accommodation as experiencing much greater levels of overcrowding these tenures which represent 39.6% and 53.7% of overcrowded households in the Borough. However, only 10.1% of private rented households were overcrowded representing some 3,200 households.
- 4.18 Figure 4.8 shows the classification and the levels of overcrowding in each OA. The overall level of overcrowding in Lambeth seems moderate (under 45%), as most of the OAs have a light shade of colouring. Although there are small pockets with the mean range (45% - 65%) and high levels

(greater than 66%) of overcrowding spread throughout the borough, there are a few evident clusters of high levels (dark shading) of overcrowding. These clusters are located in:

- The north-west of Streatham Hill Ward;
- Along the adjoining borders of Ferndale Ward and Coldharbour Ward around Brixton Road;
- The north of Vassal Ward around Brixton Road and Clapham Road; and
- Along Clapham Road in Larkhall Ward.

4.19 The dominating colours in the clusters identified in Figure 4.8 are dark red, dark brown and dark orange. The shading portrays intense overcrowding and the colours are linked to conversion concentrations above 71%. This further strengthens the correlation found between converted properties and overcrowding.

## Household Types

4.20 A significant part of assessing the social profile of the different OAs is to examine the existing household types represented in each area. This provides an understanding of the types of people and families that are attracted to specific areas to live and whether there is an association between the amount of converted properties in an area and the balance of household types

4.21 Individual household type categories were grouped into multi-person households, single person households and households with and without dependent children. The households with dependent children were highlighted and mapped in order to reveal the pockets of family housing concentrations in the Borough, in order that the impact of conversion activity on household type could be assessed.

4.22 Figure 4.9 reveals that there is no clear pattern of those pockets of OAs with high levels of family households in Lambeth. The locations of the existing groupings of OAs with high levels of family households (dark shades) are:

- Along the southern borders of Streatham South Ward and Knights Hill Ward (in the vicinity of Streatham Common);
- Towards the north of Thurlow Park Ward (along the south of Brockwell Park); and
- Towards the north of Vassall Ward (along the south of Kennington Park).

4.23 The main clusters of family households identified above are located within the vicinity of public open space. Moreover, the dominant colours in these clusters are dark green and dark turquoise, which signifies that the clusters with high levels of family households predominantly consist of streets with limited conversions or 'areas capable of further conversions' of conversion activity.

4.24 Single person households were also examined and mapped for the purpose of determining the location of their clusters, any existing correlation to conversions and how all this compares to the results of Figure 4.9.

4.25 It is clear that the colour shading in Figure 4.9 (Family Households) is the inverse of the colour shading in Figure 4.10 (Single Persons Households), i.e. OAs with high levels of family households have low levels of single person households and vice versa. This occurs throughout the majority of OAs on both maps.

4.26 Figure 4.10, shows that most of the OAs in Lambeth have a dominance of single person households (over 54%), as the majority of them are signified by dark shading. The main clusters with high levels of single person households are:

- At the north-west of Streatham Hill Ward;
- Along the adjoining borders of Ferndale Ward, Coldharbour Ward, Brixton Hill Ward and Tulse Hill Ward (around Brixton Road);
- At the north of Vassal Ward along Brixton Road;

- Along Clapham Road in Larkhall Ward;
- Along Tulse Hill Road and Norwood Road, to the west of Thurlow Park Ward;
- At the north of Herne Hill; and
- At the south-west of the borough, across St. Leonards Ward and Streatham Wells.

4.27 The identified clusters are dominated by dark red, dark brown and dark orange, indicating that they are made up of streets that have at least 71% of properties converted.

## Turnover Rate

4.28 The population turnover rate is an important indicator to assess. There is a perception that those areas with a high concentration of converted properties are likely to attract a transient population, and as such these areas will have a high population turnover and will lack a sense of community as a result. A transient population may encourage owner occupiers and landlords and tenants to invest less time and resources in the maintenance and repair of property and its surroundings if occupiers are only going to be in an area for short period of time.

4.29 The 2007 Turnover Rate, provided at Middle Super Output Area (MSOA) Level, revealed that MSOA's throughout the borough saw an overall net migration from all age groups, except for persons between 15 and 24. According to this dataset, persons between the age of 15 and 24 are the only group with an overall positive net movement and are therefore staying in the different MSOA's, whereas other older individuals, couples and families have a net outflow.

4.30 Figure 4.11 shows the turnover rate at Output Area (2001 Census). The 2001 turnover rate was mapped for each OA, as the net movement per 1,000 persons. The net movement was portrayed, as it will indicate whether the individual OA is experiencing an overall loss (a negative value) or an increase of its population.

4.31 The clusters of OAs with higher levels of population churn, are located:

- Along the adjoining borders of Ferndale Ward, Coldharbour Ward and Brixton Hill Ward;
- Along Clapham Road in Larkhall Ward;
- Along Norwood High Street and Elder Road, to the west of Gipsy Hill Ward;
- At the north of Herne Hill; and
- Along the south-west of Streatham South Ward.

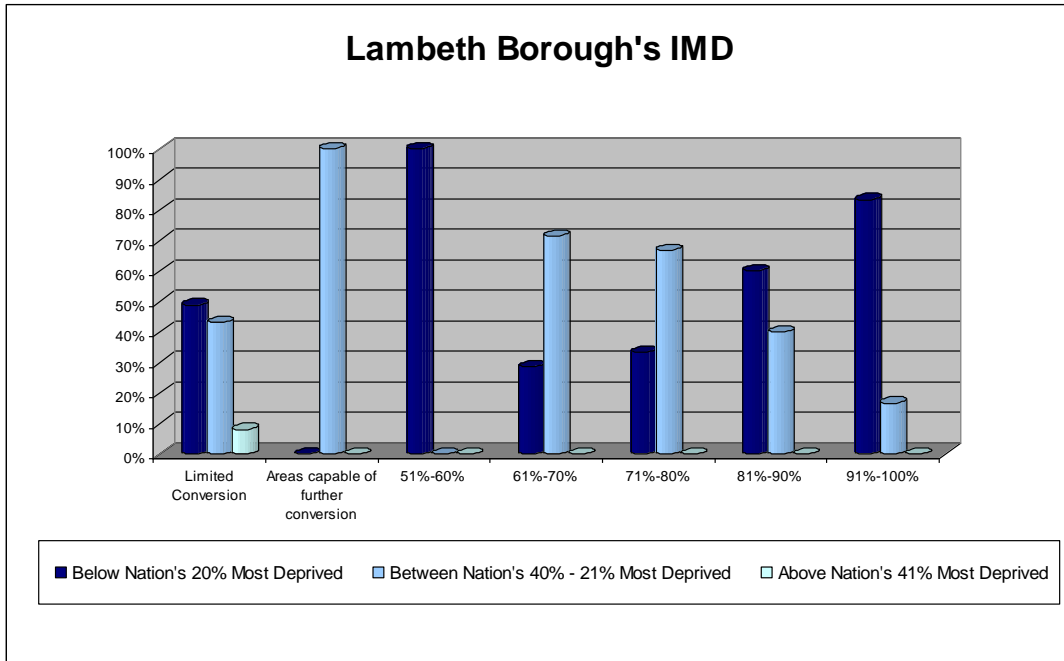
4.32 Similar to the Figures, the clusters identified with high levels of churn are generally in areas with high concentrations of residential conversions. This shows a clear correlation between high churn rates and high levels of conversions. However, the two clusters in Streatham South Ward and Gipsy Hill Ward are made up of OAs within the "limited conversions" category. Research by the Joseph Rowntree Foundation indicates that those neighbourhoods with the highest and lowest deprivation levels have the greatest levels of churn<sup>4</sup>.

## Index of Multiple Deprivation Rankings

4.33 The 2007 Index of Multiple Deprivation (IMD) rankings for Lambeth were examined at the Lower Layer Super Output Areas (LSOA) in order to compare these areas to the national standard as well as each other. The LSOAs were compared to the nation's lowest 20% and 40% IMD rankings benchmarks to determine their performance nationally and establish any existing correlation between conversions and deprivation.

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<sup>4</sup> Population Turnover and Area Deprivation Nick Bailey and Mark Livingston (JRF, 2007)



4.34 Figure 4.12 shows that the proportion of the LSOA's, that make up the nation's 20% most deprived areas, increases with the level of conversion activity. The above graph shows that this occurs at a conversion rate of 61% - 70% and continues thereon. It is also evident that none of the LSOA's with a conversion rate above 51% are within the nation's top 60% of least deprived areas. These two elements of Figure 4.12 reveal a strong correlation between converted areas and deprivation.

4.35 The graph reveals that, in Lambeth, all LSOAs with a conversion rate of 51-60% are below the nation's 20% benchmark. However, at LSOA level, there is only one LSOA with a 51%-60% classification. Its 2007 IMD Ranking is 2,844, which fell below the 20% target. Moreover, all the LSOA's classified as "Areas capable of further conversions" (six in total) have an IMD Ranking situated between 40% and 21% of the nation's most deprived areas.

4.36 Figure 4.13 shows the level of deprivation for each LSOA in Lambeth. The darkest shading of each colour implies that the LSOA is within the nation's most deprived 20%. According to the 2007 IMD Rankings, 51% of Lambeth's LSOAs are among the 20% most deprived nationally.

4.37 Figure 4.13 shows where the most deprived LSOAs are clustered together. These locations are:

- Between Prince's Ward and Oval Ward;
- Throughout Vassall Ward, Coldharbour Ward and Herne Hill Ward;
- Along Clapham Road, through Larkhall Ward and Stockwell Ward and around the north of Tulse Hill Ward;
- Along the north and south of Streatham Hill Ward; and
- Spread around the adjoining border of Knights Hill Ward and Gipsy Hill Ward.

4.38 Although Figure 4.13 shows that some of the clusters of highest residential conversions are also in the most deprived wards in the country, it also shows that there are large parts of the Borough that have limited conversion activity but are in the 20% most deprived in the country. Therefore the correlation between deprivation and clusters of conversion is not as clear as other indicators.

## Section Summary

4.39 The ONS data has help to verify the classifications of streets and OAs established in Section 3. The data shows that those OAs that have been classified as having high levels of conversion activity have fewer houses remaining and therefore less potential for future conversions.

- 4.40 The data showed that car ownership per household decreased as the levels of conversion increased, which contradicts the perceptions held by several Councils on the relation between parking stress and conversions. However, although individual households in areas with the greatest number of converted properties have fewer cars per household in areas with limited conversion. These areas have greater population and household densities (see Figures 4.4 and 4.5). The effect of higher densities of people and homes in converted areas can lead to greater cumulative effects on the availability of parking.
- 4.41 In addition to higher population densities, the ONS data revealed that areas with more conversions are prone to overcrowding. Figure 4.7 shows overcrowding levels rise sharply when conversion rates reach over 71%. As overcrowding is a measurement of the lack of residential space available for an existing population, the quality of life of the populations in highly converted areas declines due to the negative effects associated with overcrowding. Figure 4.8 identifies the locations of concentrations of overcrowding.
- 4.42 According to the 2001 Census Data, there are not many large clusters of family housing in Lambeth (Figure 4.9). Where they do exist, they tend to be within the vicinity of public open space and consist of OAs with a conversion rate under 50%. The data also showed that Lambeth Borough had a 54% majority of OAs consisting of single person households. The OA clusters with more single person households were closely linked to those where more than 71% of properties are converted.
- 4.43 Concentrations of conversions can have detrimental effects on the immediate social, natural and built environment, linked to high levels of population migration and community turnover. Figure 4.11 shows that OAs with the greatest levels of churn per 1,000 persons are found in clusters with high levels of conversions. However, the data revealed that two clusters of high population migration per 1,000 persons, in the south of the Borough, within areas which have limited conversions. It was determined the high levels of turnover are likely to have been caused by other negative factors unrelated to conversions.
- 4.44 According to the 2007 IMD Rankings, 51% of Lambeth's LSOAs are within the nation's 20% most deprived LSOAs. This is reflected in Figure 4.13. The correlation between deprivation and clusters of conversion is not as clear as other indicators, and there are large parts of the Borough with limited conversion activity that are also deprived.
- 4.45 The 2007 IMD data provided Lambeth's average IMD ranking and the benchmark ranking for the nation's 20% most deprived LSOA's (Figure 4.12). When comparing these standards to the average IMD Ranking of each LSOA classification, it is clear that areas with limited and potential conversions are less deprived than the borough's average and the nation's 20% benchmark, whereas areas with conversion rates over 70% are more deprived.



## 5. Environment and Amenity Analysis

### Introduction

- 5.1 This section sets out the approach used for undertaking the audit of environmental quality and amenity of Lambeth's streets using the classification of streets identified in Section 3. This section also sets out an analysis of the findings of the street audit.

### Survey Methodology

#### Audit Proforma and Environmental Indicators

- 5.2 The audit of streets was carried out in February and March 2009 by appropriately qualified planning consultants. A proforma was developed to capture key environmental and amenity indicators relating to each street. The questions on the proforma in general allow the surveyor to identify the percentage of properties (less than 10%, 10-20%, 20-30%, 30-40%, 40-50% and over 50%) in a street where an indicator is evident. The survey collected information on several environmental and amenity indicators including the following:

- Quality of external building facade;
- Alterations to buildings;
- Quality of external space;
- Evidence of clutter;
- Evidence of dumping;
- Quality of amenity space; and
- Parking issues.

- 5.3 The proforma was agreed with the Council prior to the Consultants commencing the audit, a copy of the proforma is attached as Appendix A.

#### Street Sample

- 5.4 The Consultants surveyed a sample of 300 streets. The approach to developing the survey sample was agreed with the Council before the site audit began. It is important to survey a sample of each street type that were identified in Section 3 (except streets that were excluded – as they comprised entirely purpose built flats), so that the environmental and amenity impacts of differing concentrations of existing residential conversions could be assessed. Those with concentrations of conversions represented the largest group in the sample, followed by those that have some conversion activity/potential for future conversions. The survey sample also included some of the streets that have limited activity/potential as a control sample for comparison purposes.

- 5.5 The sample frame was as follows:

- Limited conversion activity and limited future potential = 50 streets (17% of the total sample) - this is in effect a control group;
- Some conversion activity but at area risk of future conversions = 84 streets (28% of total sample); and
- Existing concentration of conversions = 166 Streets (55% of total sample).

- 5.6 The 166 streets grouped under 'existing concentration of conversions' were split so that for each of the street types identified in Section 3 approximately 50% of streets in this category were surveyed. The sample for these was as follows:

- 51-60% of properties converted = 34 streets;

- 61-70% of properties converted = 35 streets;
- 71-80% of properties converted = 35 streets;
- 81-90% of properties converted = 33 streets; and
- 91-100% of properties converted = 29 streets.

5.7 The sample was stratified to ensure that an appropriate proportion of each of the above street types in each sub area was sampled.

5.8 The Consultants did not audit the main transport routes in the sample as these roads are long and varied in character, and building typology, and it was felt that the pro-forma was unlikely to identify meaningful results for these streets so these were discounted from the sample.

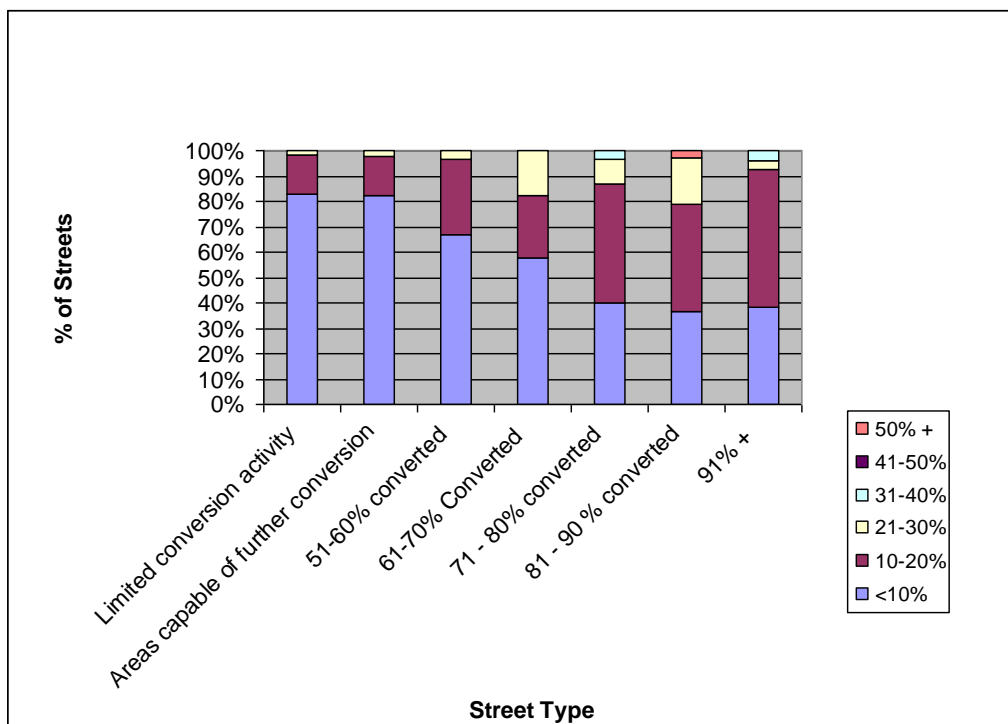
5.9 It should also be noted that main transport routes are generally not well suited to family accommodation and therefore residential conversions on main transport routes are, in general, considered appropriate.

## Survey Findings

### External Appearance of Buildings

5.10 The site audit included various indicators assessing the external appearance of buildings and its surroundings, in order to assess the environmental and amenity impact that concentrations of residential conversions has on a street. Assessment of the maintenance and appearance of the building facade (rendering, window frames, brickwork and roof) shows that there is a clear correlation between the level of residential conversions in a street and the quality of external appearance (see Photo 1). Figure 5.1 shows that both the limited conversion and areas capable of further conversions streets show the same pattern with 83% of streets having less than 10% of properties with a poor external appearance, 15% of streets with 10-20% of properties with poor external appearance and only 2% with 21-30% of properties with poor external appearance. Once there are over 50% of properties converted in a street the percentage of properties with poor maintenance and external appearance increases. Those streets with 71-80% of properties converted have significantly more properties with poor maintenance and external appearance, this pattern continues as streets have greater proportions of conversions.

Figure 5.1 – Maintenance and upkeep of external facade



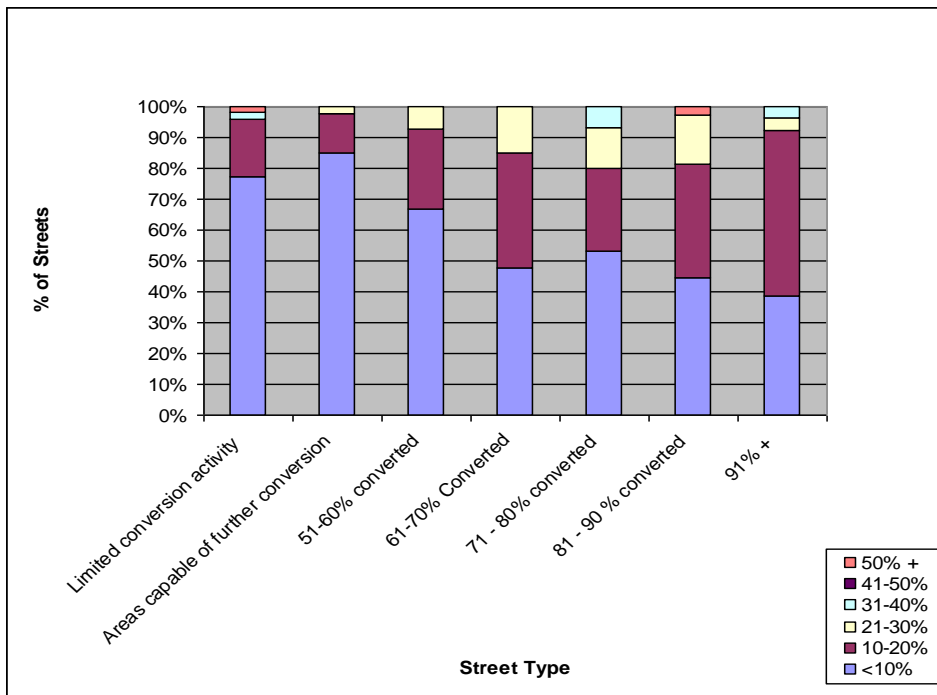
N.B – Legend shows percentage of properties with poor external facade



Photo 1: Poorly Maintained Facade

5.11 Figure 5.2 shows that as with the up keep of the buildings in a street, the poor upkeep of front gardens and external areas correlates with the proportion of residential conversions. Both the limited conversion and areas capable of further conversions streets show a similar pattern with approximately 80% of streets having less than 10% of properties with a poor upkeep of gardens/external areas. However, 67% of streets in the 51-60% of properties converted category have less than 10% of properties with poor external areas, once over 60% of properties are converted the percentage falls to around 50% or lower.

Figure 5.2 – Up keep of external areas

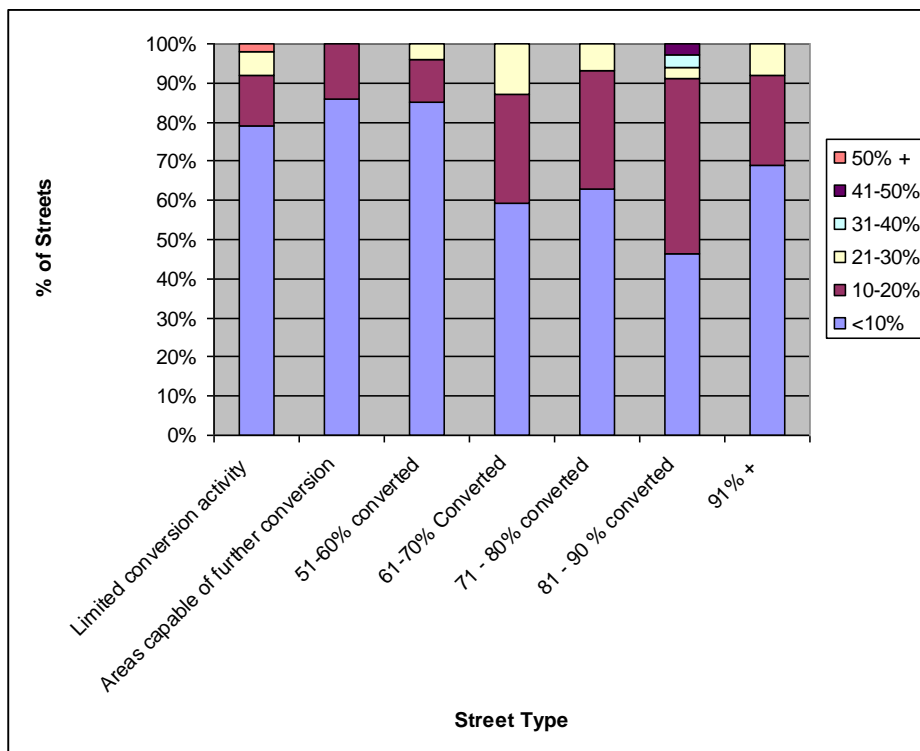


N.B – Legend shows percentage of properties in a street where the upkeep of external areas is poor

5.12 Property boundaries that are defined by walls, railings or fences help to create a pleasant street scene. Properties with well defined boundaries have ‘defensible space’ that residents may be more likely to look after, than a property without boundaries. In general over 90% of streets in most of the street types having less than 10% of properties without defined boundaries. The two exceptions are in streets where 71-80% of properties are converted, where the 87% of streets have less than 10% of properties without defined boundaries and streets with 81-90% of properties converted where this percentage drops to 76% of the streets. Generally those streets with a higher proportion of conversions have a higher percentage of properties without defined boundaries, but the correlation is not particularly strong and interestingly those streets that ‘area at risk’ are the only street type where there was evidence of streets with over 50% of properties without defined boundaries.

5.13 The audit assessed the upkeep of property boundaries and in particular the percentage of properties with boundaries in poor condition (see Photo 2). Figure 5.3 shows that approximately 80% of streets in the limited conversion activity, areas capable of further conversions and 51-60% converted categories have 10% or less properties with boundaries in poor condition. The percentage of streets with a higher proportion of properties with poorly maintained boundaries increases as the percentage of properties converted increases above 60%, and appears to peak at the 81-90% converted category, where 47% of streets have less than 10% of properties with boundaries in poor condition.

Figure 5.3 – Up keep of property boundaries



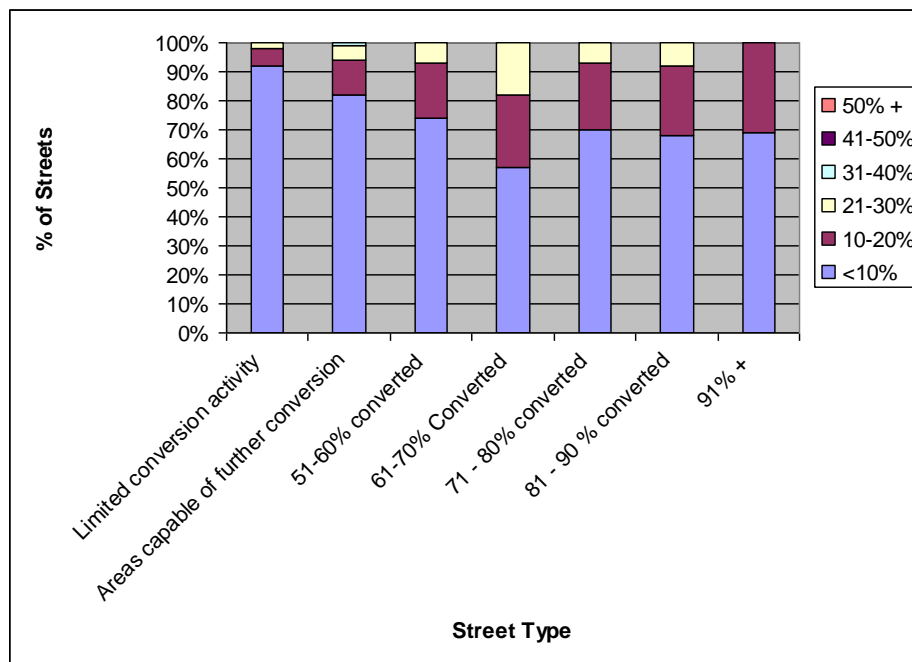
N.B – Legend shows percentage of properties in a street where upkeep of boundaries is poor



Photo 2: Poorly defined and maintained boundary

5.14 Alterations to buildings (not requiring planning permission) such as additions of front/side or roof extensions or alterations to features such as brickwork, cornices, period porches etc, if unsympathetically carried out can have an impact on the property and the street scene as a whole. Figure 5.4 shows that there is a general pattern that properties with unsympathetic alterations increases with the proportion of conversions however there is no clear ‘tipping point’ where a certain proportion of properties converted has a significant impact.

Figure 5.4 – Unsightly alterations to property

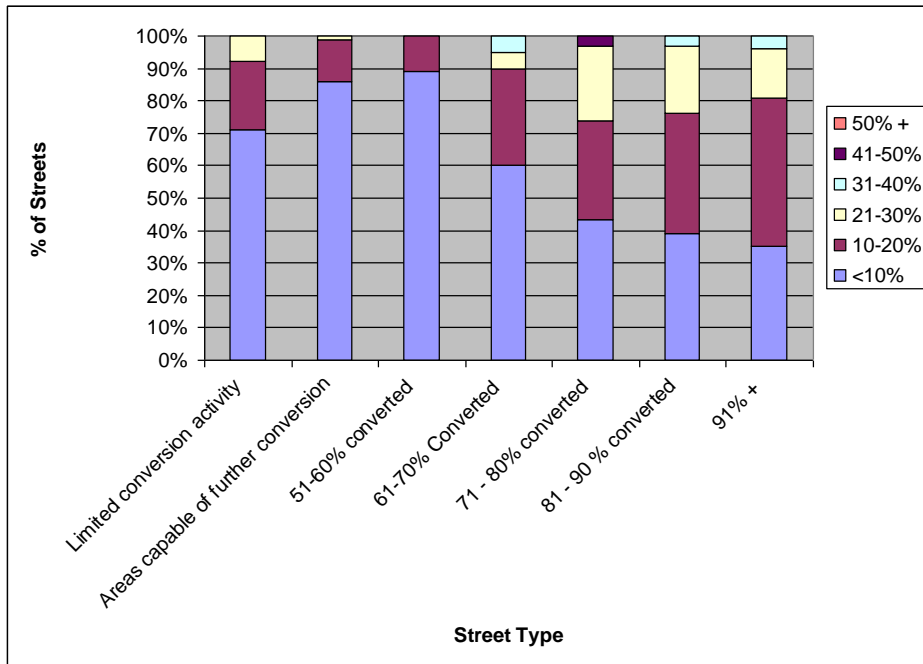


N.B – Legend shows percentage of properties in a street with unsightly alterations

### Clutter and Dumping

5.15 Figure 5.5 shows the effect of conversions on the evidence of visually intrusive clutter on a building such as multiple satellite dishes, wheelie bins, utility meters etc (see Photo 3). Figure 5.1 shows that for streets within the ‘areas capable of further conversions’ category and those with 51-60% of properties converted there is limited evidence of clutter. The limited conversion category has more properties with evidence of clutter. In addition, it is clear that as the proportion of conversions reaches 61% there is a significant increase in properties with evidence of clutter.

Figure 5.5 – Evidence of Clutter



N.B – Legend shows percentage of properties in a street with evidence of clutter



Photo 3: Evidence of clutter

5.16 There is clear evidence that the incidences of dumping (large uncollected items, or vehicle repairs) either within the curtilage of properties or on the street increase with the proportion of conversions (see Photo 4). Figure 5.6 shows a general trend is that the greater the proportion of residential conversions in a street the more likely it is that a street will have evidence of dumping. Although those streets with over 91% of properties converted don't follow the trend, they are the only street type where some streets had more than 2 occurrences of dumping.

Figure 5.6 – Evidence of dumping on the street

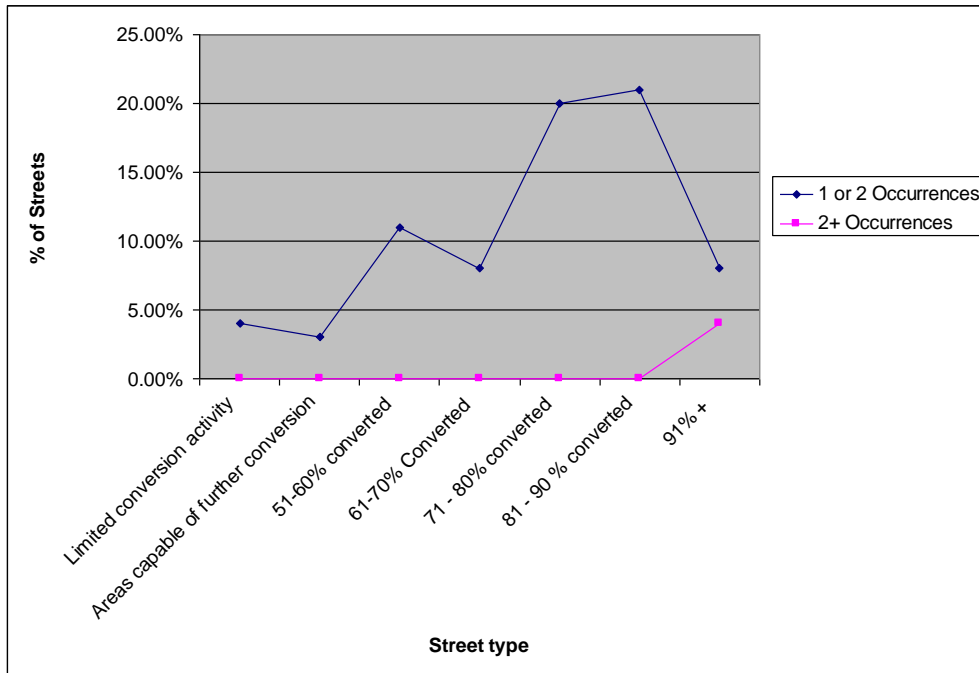
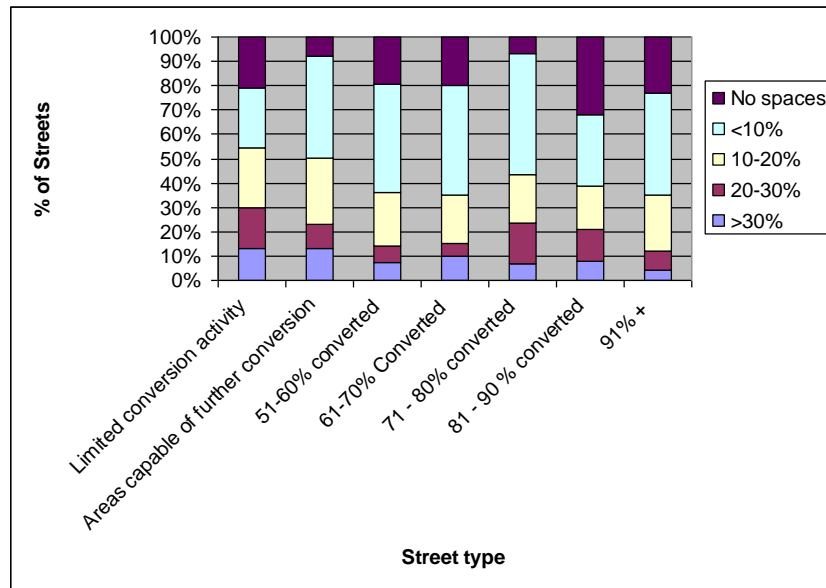


Photo 4: Dumping and poorly maintained external area

### Parking issues

5.17 It was beyond the scope of this study to carry out a night time parking survey, however the audit did assess the level of day time parking spaces available in a street. Figure 5.7 shows that streets with 81-90% of properties converted are the street type with the greatest percentage of streets that have no spaces available. Streets with 51-60% converted, 61-70% converted, and over 91% converted as well as the limited potential streets have approximately 20% of streets with no spaces available, showing that there is no clear correlation between the number of parking spaces available in the street (at the time of survey) and the proportion of properties that have been converted.

Figure 5.7 – Percentage of parking spaces available

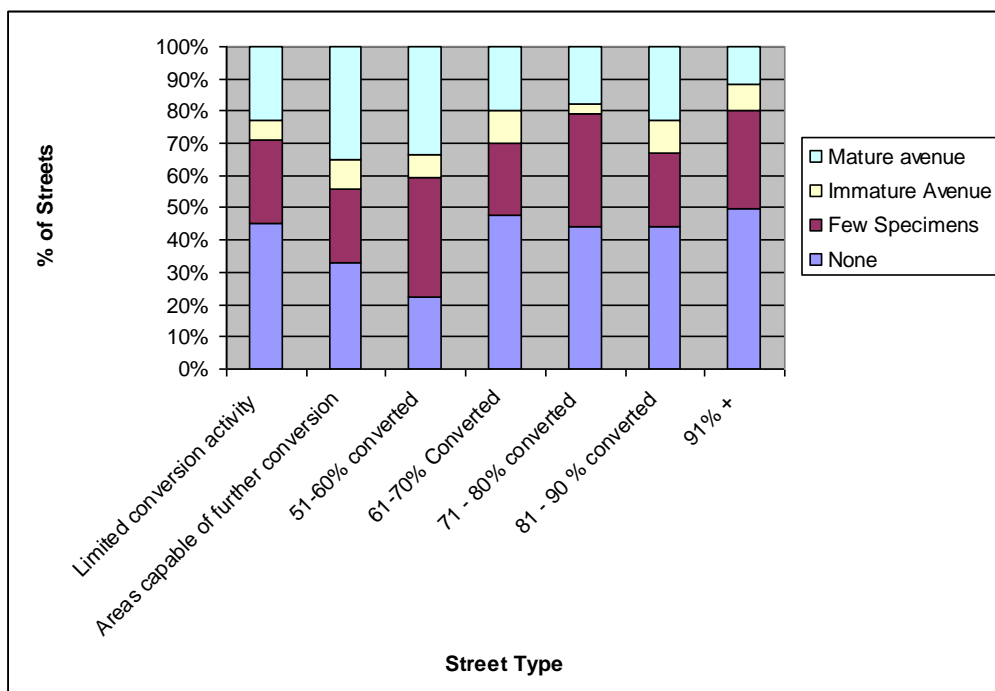


N.B – Legend shows percentage spaces available in a street

### Quality of landscaping

5.18 The site audit assessed the quality of landscape in Lambeth’s streets, this included assessing whether there were street trees within the street, and if so whether the trees were mature or not. Although the presence of streets trees and amenity space would not be directly affected by residential conversions it was considered important to assess the general landscape quality of streets as an indicator of general environmental capacity of streets. Figure 5.8 shows that there are approximately 40% to 50% of streets without trees in each street type with the exception of areas capable of further conversions streets (33%) and 51-60% converted which has 22% of streets without trees.

Figure 5.8 - Presence of Street Trees

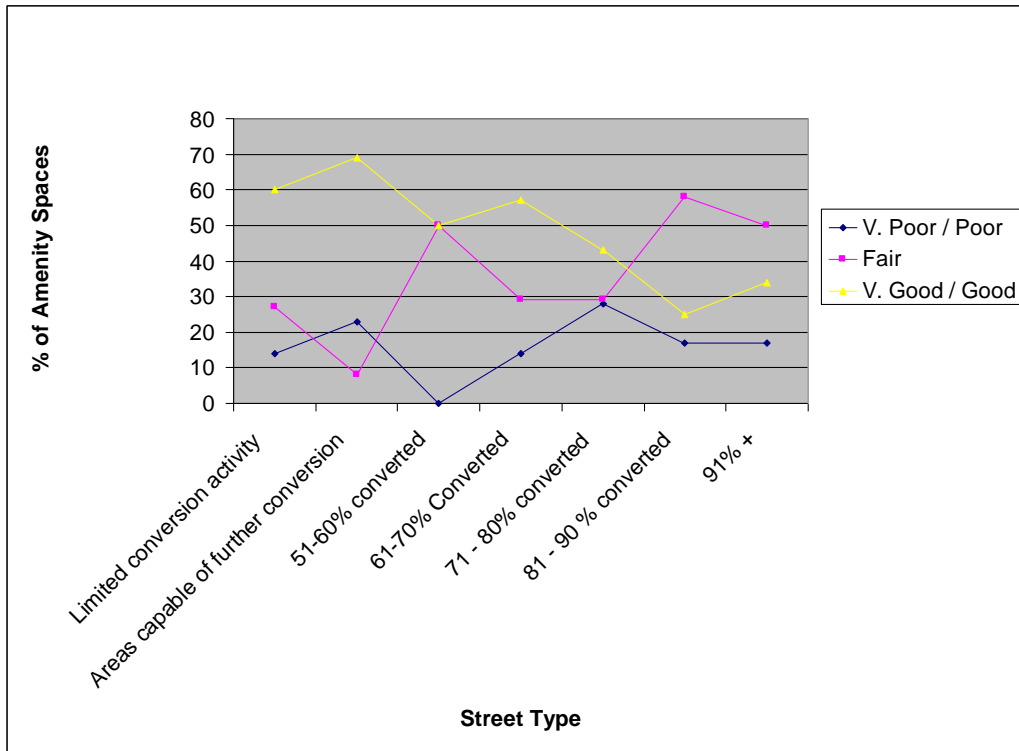




5.19 The survey also considered the presence of amenity space and where amenity space was present, the quality of that space. There is no correlation between the proportion of conversions in a street and the presence of amenity space. Interestingly those street types that are least likely to have amenity space are streets in the areas capable of further conversions category and the 51-60% converted streets, however, these are the street types that are more likely to have street trees. Those conversion categories that are most likely to have amenity space present are those in the 81-90% properties converted category where 32% of streets have amenity space.

5.20 Where amenity space was present the quality was considered. Figure 5.9 shows that the quality of amenity space varies for each of the conversion categories, however it does show that in general there are fewer very good or good quality amenity spaces in streets where the proportion of conversions is greater. Showing a slight deterioration in quality as streets are more heavily converted.

Figure 5.9 – Quality of amenity space



**Section Summary**

5.21 The street audit provides an indication of the quality of environment and amenity in the Borough, and has enabled a comparison of the impact of varying degrees of residential conversion on environmental quality.

5.22 The evidence from the street audit shows that on the whole it is rare to find a high proportion of properties in a street that with poor amenity /environmental issues. However although a street may only have a few properties where amenity and upkeep are poor, this can have a significant impact on the street scene as a whole, and when considered in the wider context where several streets nearby may be experiencing similar issues, the impact can be significant.

5.23 The street audit shows there to be clear correlations between the number of residential conversions in a street and several environmental indicators. In particular as residential conversions increase the following environmental / amenity indicators intensify:

- Poor maintenance and external appearance of buildings;
- Upkeep of front gardens and external facade;
- Poorly maintained boundaries;
- Unsympathetic alterations;
- Evidence of clutter; and
- Evidence of dumping.

- 5.24 Upkeep of front gardens and external facade, poorly maintained boundaries; and evidence of clutter all increase significantly once over 60% of properties in a street are converted. Poor maintenance and external appearance of buildings shows a significant increase at over 50% of properties converted, whilst evidence of dumping shows a significant increase once over 70% of properties are converted. Unsympathetic alterations have no clear 'tipping point' where the level of conversions has a significant impact.
- 5.25 Overall the evidence gathered suggests that environmental and amenity standards decrease as levels of conversion increase.

## 6. Policy Options

### Introduction

- 6.1 This section identifies recommendations to the Council on the policy approaches that the Council could take when reviewing the existing policy approach established within the UDP. It also considers the suggested approach set out in the Core Strategy in the saved policies.
- 6.2 The recommendations take account of the evidence that has been collected through the various strands of this study including: the policy review; analysis of residential conversion appeals in London; analysis of the past residential conversion trends in Lambeth; the Valuation Office data; the site audit and the socio-economic profiling. This section uses the evidence in Sections 2 -5 of this report and expands on this evidence to develop various policy approaches to residential conversions that could be applied in Lambeth.
- 6.3 The Consultants recommendations follow three broad themes, the first is a need to strengthen the existing policy approach adopted in Lambeth, the second is to adapt the policy approach and the final theme is to strengthen control over residential conversions through consideration of restricting permitted development rights.

### Objectives of the Policy

#### Current Approach

- 6.4 As discussed in Section 2 the primary objectives of existing Policy 17 are two-fold; to maintain a stock of purpose built family size housing and ensure an adequate standard of accommodation. The policy includes several other criteria which are focused on ensuring development is acceptable in planning terms such as the size, form and design of development and the accommodation provided, visual impact its effect on character of listed buildings or the setting of Conservation Areas and impact on parking. The existing UDP policy focuses on individual conversions in isolation and their marginal impact on existing streets.
- 6.5 The SPD on Guidance on Housing Standards and Housing Conversions adopted in 2008 supports the UDP policy providing expansion and clarification of the Council's approach. The additional guidance provided includes:
- Space standards for minimum dwelling and room sizes;
  - A full mix of unit sizes should be provided, including, at least family sized unit (60 sq.m+) with at least two + bedrooms and access to a garden when on the ground or lower ground floor;
  - Original front gardens should be retained and if on site parking is to be provided there should be a balance between the area of hardstanding and the amount of greenery retained.
  - Cycle parking and bin stores should be avoided in sensitive locations and be appropriately screened.
  - Conversions should provide an acceptable standard and should not have a visual impact on the street;
  - Recognition that house conversions can contribute to the creation of sustainable, liveable mixed communities and can make more effective use of urban land.
  - Avoidance of harm on the amenity of neighbouring occupiers
- 6.6 The SPD defined the concept of Over-intensification referred to in Policy 17. This is defined both in terms of the physical built form and massing, and its associated environmental effects including the cumulative impact on a street or area.
- 6.7 Examples of over-intensification are set out Paragraphs 5.9 to 5.11 of the SPD these include where:

- Extensions are required to meet the minimum floorspace sizes that the SPD requires;
- Detrimental effects on character and amenity of an area arise through proliferation of rubbish/recycling bins, extra cars in front gardens, and a generally cluttered and untidy street.

6.8 It is the cumulative affect of several over intensive developments that can have a wide impact on amenity of an area. It is for these reasons that Policy 17 makes it clear that where large extensions would result in over intensification permission will be refused (as the review of planning appeals in Section 2 has shown).

6.9 The purpose of this report is to assess the extent of residential conversions in Lambeth, the impact on the housing supply and availability of family housing and the effect of residential conversions on the amenity and character of residential neighbourhoods and the ability to achieve mixed and balanced communities. A key outcome of the report is to provide a robust evidence base to support the Council's Core Strategy policy approach to residential conversions. In order to achieve this, the study has included consideration of:

- additional criteria which may be added to the policy in order to better reflect when a Conversion development is acceptable in planning terms by considering other borough policies and national and regional guidance (see Section 2);
- thresholds concerning over concentration and the cumulative impact on environment, amenity and infrastructure;
- the impact of the Conversion Policy on housing supply a key issue raised by representations by the Government Office for London in connection with the UDP;
- the impact of the Conversion Policy on delivery of an appropriate mix of dwelling sizes;
- the impact of Conversion Activity on the creation of mixed and balanced communities and social and community infrastructure provision especially with regard to community turnover and overcrowding for example. This issue has assumed greater importance in policy at national and regional level; and
- potential mitigation of the effects of conversion development.

6.10 Whilst the analysis of appeal data (set out in Section 2) has demonstrated that Lambeth currently has a robust approach to controlling residential conversions, the review of other Borough policies shows that Lambeth's existing approach could be strengthened in particular to control the number of conversions in an area. Section 3 has shown that under the current policy 49% of the Borough's remaining purpose built houses or bungalows are of a size (i.e greater than 120 sq.m UDP policy threshold) that would mean they could be eligible for conversion. If all these properties were converted this would leave 16,090 unconverted properties (only 13% of all properties in the Borough).

6.11 Section 4 and 5 have identified a correlation between intensity of residential conversion in a street and the prevalence of certain socio-economic indicators and detrimental effects on environmental quality and amenity.

6.12 The evidence set out in section 2 - 5 highlights the need to strengthen Lambeth's policy on residential conversions in the interests of maintaining mixed and balanced communities and in order that residential conversions do not negatively impact on surrounding communities.

### **Option formulation**

6.13 Five options have been identified which could provide a basis for establishing an appropriate policy approach for managing Conversion development within the Borough and its associated effects.

6.14 The options have taken account of the different strands of research and analysis undertaken as part of this study including the benchmarking of other policy approaches within London, wider

regional and national guidance and an empirical analysis of the pattern of conversion activity in Lambeth.

6.15 The options considered include:

- Option 1 – Retention of the existing policy in its current form
- Option 2 – Minor revisions to strengthen existing policy approach
- Option 3 – Adopt a locational approach to the management of conversion activity including preferred locations for conversions, restraint areas and “at risk areas” where appropriate mitigation may be required to accompany further conversion activity.
- Option 4 – Increase the size threshold of dwellings eligible for conversion from 120 sq.m to 150 sq.m
- Option 5 – Combining a restraint areas policy and raising the threshold.
- Option 6 – Removal of selected Permitted Development Rights

## Performance Criteria

6.16 To evaluate the merits of each of the options a multi-criteria evaluation framework was established to identify the benefits and disbenefits of each policy option. The following performance criteria establish the critical issues against which policy options should satisfy:

### Effect on housing supply

- 6.17 At present the study has identified that there are some 33,164 units within the Borough which are unconverted (refer to Table 3.1).
- 6.18 At present there are in the region of 29,550 flats or maisonette within converted domestic properties in the Borough. The number of houses converted to flats is not recorded in the VOA data (only total number of flats in converted properties is provided), however, the average number of flats per property is likely to range between two and three flats per property which would indicate that somewhere between 38-48% of the supply of houses originally over 120 sq.m has already been converted.
- 6.19 Housing Conversions typically represent between 20-30% of housing completions per annum within the Borough (refer to Table 3.3 for the last four years) yielding an average of 297 units per annum. Based on past trends and the number of unconverted properties over 120 sq.m there is likely to be 40-80 years of residual supply in the Borough.
- 6.20 It can be argued that conversions make a significant contribution towards meeting local housing needs with respect to smaller sized flats which may increase the supply of small sized units suited to first time buyers as well as flats for private rental. Conversions can be an efficient use of land and to some extent flats of two or more bedrooms are providing, in some cases, affordable units for small families. The approach to managing conversions should not compromise the delivery of housing and affordable housing or the Council meeting its housing requirements. However, the contribution of conversions to meeting housing supply needs to be set within the context of other sources of housing supply. 58% of residential units completed in the last 4 years have been through new build. In addition, the Council’s latest Housing Development Pipeline Report (2008 / 09) has demonstrated there is at least 6.5 years of supply in the pipeline more than meeting Government requirements to provide 5 years worth of housing supply. The Strategic Housing Land Availability Assessment identifies sources of housing land which will be used to meet London Plan dwelling requirements.
- 6.21 For these reasons the Council’s conversion policy must allow some residential conversions, a wholesale ban on residential conversions is neither desirable nor achievable as this type of policy approach is likely to be challenged when the relevant Development Plan Documents are examined in public.

Effect on the supply of an appropriate mix of unit sizes including family sized units

- 6.22 Policy 15 of the Adopted UDP identifies that housing developments with 10+ units (or 0.1 ha or above) should include an appropriate mix of unit sizes to meet local needs. A similar policy may be included in the Core Strategy or Development Control Policies which may set more guidance on the mix of units to be sought in connection with new development.
- 6.23 Policies and guidance specifically relating to conversions affects the overall balance of housing unit sizes within the Borough in the following ways:
  - Conversion of houses into flats leads to the loss of larger family sized units
  - The replacement properties delivered through intensification of the property are necessarily smaller. There is a requirement for a family sized unit of 2 or more beds with direct access to the garden to be provided, the space requirement for 2 bed flat is at least 60 sq.m in size<sup>5</sup>.

**Balance of units currently required**

- 6.24 The Housing Needs Update Study undertaken in 2007 identified the scale and balance of unit sizes required in the Borough for affordable and market housing. The housing model is based upon the results of a household survey and assessment of potential and newly forming households in the Borough.
- 6.25 Table 6.1 shows that there is a shortfall of housing and that, in terms of market housing, small properties (1 and 2 bed) represent some 62% of both supply and demand and larger properties (3 and 4 bed) represent some 38% of demand and supply.
- 6.26 The scale of demand could potentially be met by churn and turnover of the existing stock as well as additions to housing supply.

**Table 6.1 – Balance of housing Demand and supply by size.**

	Small (1 and 2 bed)	Large (3 and 4 bed)	Total
<b>Annual Supply</b>			
Market	6,869	4,214	11,083
	62%	38%	
Affordable	4532	1,866	6,398
	71%	29%	
<b>Total</b>	<b>11,402</b>	<b>6,079</b>	<b>17,481</b>
<b>Annual Demand</b>			
Market	7,242	4,386	11,628
	62%	38%	
Affordable	4,795	2,158	6,953
	69%	31%	
<b>Total</b>	<b>12,038</b>	<b>6,543</b>	<b>18,581</b>
<b>Net demand</b>	<b>-636</b>	<b>-464</b>	<b>-1370</b>

Source: Lambeth Housing Needs Update 2007, Fordham Research

<sup>5</sup> Guidance and Standards for housing Development and Conversions SPD (2008), Figure 2

**Stock of larger family sized units**

- 6.27 Section 3 (Table 3.1) shows that in terms of unconverted domestic properties 14% are one and two bed properties, 50% are 3 bed properties and 32% four bed or more. However with reference to Table 3.1 unconverted properties represent only 26% of dwellings in the Borough.
- 6.28 However, within Purpose Built Flats and Conversions within domestic and commercial properties (the other major categories of dwelling) are dominated by two and three bed units. Therefore unconverted domestic properties make a greater contribution towards the supply of medium and larger family sized units (three bedrooms +).

**Units currently delivered through housing conversions**

- 6.29 In terms of the mix of unit sizes currently being delivered through conversion developments one bedroom and studio units represented 51% of completions in 2005/6 and 57.5% of completions in 2006/7. By implication this means that in these two years 49% and 32.5% of units were provided with two or more bedrooms. However monitoring information is not available on larger sized units.
- 6.30 In terms of the delivery of larger sized units. Within all development in the Borough, family sized units have represented the minority of new units coming forward with three and four bed units representing some 12-15% of new supply over the last three years. Figures by tenure are only available for the 2007-8 these show that only 7% of market housing is provided as three and four bed units.

**Table 6.2 – Proportion of Housing Completions by unit size (gross)**

Unit Size	2007 - 2008	2006 - 2007	2005 - 2006
1 bed	35%	38%	40%
2 bed	53%	47%	45%
3 bed	10%	12%	11%
4 bed or more	2%	3%	4%

Source: London Borough of Lambeth Annual Monitoring Report 2006, 2007, 2008.

- 6.31 The analysis of the demand and supply of larger three and four bed family sized units represents over a third (38%) of overall needs within the Borough. Despite Housing Policy 15 requiring an appropriate mix of unit sizes at present less than 15% of new housing completions are three and four bed units. This means that in terms of balance, the stock of larger (three and four bed) family sized units is being depleted in the Borough through conversion activity with new development not contributing a significant number of similar units. Without appropriate policy controls it is likely that the loss of larger family units would continue.
- 6.32 An enhanced policy approach should seek to maintain a balance of unit sizes including larger three and four bed family sized properties in the Borough. This could be achieved by a two pronged approach of increasing the proportion of such dwellings through new development (mix of dwelling size is already required through Policy 15) and protecting larger family sized units (in particular three and four bed dwellings) through a policy regulating the development of Conversions of domestic properties.

**Effect on the acceptability of conversion development in planning terms**

- 6.33 The existing policy approach established within Policy 17 and the Supplementary Planning Document identifies several criteria which Conversion Development should fulfil to avoid over intensification and ensure that in relation to Listed Buildings and Conservation areas account is taken of the special characteristics of these areas:

## General Criteria

- Property is large enough for the number of flats proposed and that they are of a satisfactory size;
- Not requiring extensions to meet minimum floorspace standards;
- Avoiding awkwardly shaped or arranged flats;
- Units should have access to satisfactory daylight;
- Acceptable design and massing;
- Avoid detrimental effect on the character and amenity of an area. The proliferation of rubbish bins, recycling bins, external meter boxes, extra cars in front gardens can lead to a cluttered and untidy street scene;
- Appropriate mix of units where there is more than one unit including a family sized unit of two or more bedrooms (at least 60sq.m) on the ground floor/semi-basement with direct access to a garden;
- Handing and stacking of rooms to address privacy and noise and disturbance issues;
- Appropriate noise insulation;
- Preference for flats to be accessed through one front door unless the proposal involves a basement;
- External appearance - Including retention of the original exterior of the building without any significant alterations such as the addition of external staircases and dominant extensions and appropriate siting of meter boxes;
- Front Gardens - Retention of original front gardens. Should there is a requirement to provide car parking on site, there should be a balance between the area of hardstanding and the amount of greenery to be retained;
- Provision of appropriate boundaries and thresholds to buildings to give adequate privacy to the ground floor and mediate between public and private space through the use of railings and planting;

In relation to conversion of listed buildings or buildings in conservation areas:

- Retention of the original internal form of a building and its special features;
- Avoid adverse affect on the character of a building of special architectural or historical interest.
- Avoid adverse affect on the character or appearance of a conservation area;

6.34 The policy approach going forward should retain or improve upon the criteria set out above which are consistent with the advice provided in PPS3 regarding intensification of development in urban areas.

6.35 The evidence presented in Section 5 provides support for policy criteria relating to front gardens, appropriate boundaries and thresholds and external appearance by demonstrating how streets with more Conversions experience greater environmental effects regarding these issues as well as issues relating to maintenance and upkeep of external areas, clutter and dumping.

## Cumulative effect on local environmental capacity

6.36 At present the policy approach relating to Conversions deals with the cumulative effect of Conversion development relating to two main issues:



- The cumulative effect on local amenity where the individual harm from individual Conversions may cumulatively result in a serious, damaging impact upon a local area, the wider area, and their residents; and
- The effect on parking provision where conversions are proposed within areas of “severe parking stress” as defined by Policy 14e which requires an overnight parking survey to establish whether the street is experiencing parking stress.

- 6.37 The evidence presented in Section 5 provides support for policy criteria relating to the cumulative impact of front gardens, appropriate boundaries and thresholds and external appearance by demonstrating how streets with more Conversions experience greater environmental effects regarding these issues as well as issues relating to maintenance and upkeep of external areas, clutter and dumping.
- 6.38 Parking was an issue which was also investigated: however, it was not possible within the context of this study to assess the patterns of parking stress based on overnight surveys. The assessment of parking availability based upon a snapshot assessment of parking availability at the time of the street surveys did not reveal a clear pattern relating to the level of Conversions. Whilst car ownership per household was shown to be lower within conversion areas but with conversions having the effect of intensifying the number of households and therefore cars this did not have a direct relationship with parking availability. This is more directly affected by the width and design of the street, parking restrictions which may be in place and the supply of potential for off street parking. It should be noted that Controlled Parking Zones (CPZs) have been successful in managing parking demand.
- 6.39 The policy approach going forward should seek to retain or improve upon the criteria set out above.
- 6.40 One additional criteria which should be taken into account is the additional pressure Conversions place on the provision of public open space. It may be appropriate for Conversions to make appropriate contributions towards increasing the level of local provision or improving the quality of existing spaces in common with other types of development. The Council’s Planning Obligations SPD does not currently require contributions towards parks and open spaces for housing conversions. However, the evidence in Section 5 shows that the quality of parks and amenity spaces within streets with more conversions are in poorer condition than streets with fewer conversions.
- 6.41 In addition it may be appropriate for Conversion Development to contribute towards appropriate environmental improvements as set out in the Council’s Planning Obligations SPD to address the additional affect of conversions on local amenity through enhancement of the street environment.
- 6.42 In areas with significant problems there is potential for the Council to use Section 215 Notices to address the effect on local amenity of existing development and issues within the curtilage of the dwelling within those streets which are most significant.
- 6.43 Section 215 Notices arise under special powers and are discretionary. In cases where untidy land gives rise to significant detriment to the amenity of a neighbouring locality, the Council may serve a Section 215 notice of the landowner. The landowner could be asked to tidy the land (e.g. by removal of rubbish, materials, etc.) within a specified time or to improve the condition of a building. The notice has a minimum of 28 days to come into effect and may be appealed in Court. The Council may carry out works in default of the notice and level a charge on the land to recover its costs.

**Cumulative effect on the ability to build and sustain mixed and balanced communities**

- 6.44 At present the existing policy approach does not specifically address issues relating to the social impact of conversions and their effect on the potential to deliver mixed communities. Previously no evidence had been collated to address these issues which this study has addressed.

6.45 This is an issue which has been afforded greater priority in national planning policy guidance since the Lambeth UDP was prepared.

**National Planning policy guidance**

6.46 Para 24 of PPS 1 Supplement identifies that

6.47 “In deciding which areas and sites are suitable, and for what intensity of development, planning authorities should.....take into account:

- criteria 2 whether there is, or the potential for, a realistic choice of access by means other than the private car and for opportunities to service the site through sustainable transport;
- criteria 3 the capacity of existing and potential infrastructure (including for water supply, sewage and sewerage, waste management and community infrastructure such as schools and hospitals) to service the site or area in ways consistent with cutting carbon dioxide emissions and successfully adapting to likely changes in the local climate;
- criteria 4 the ability to build and sustain socially cohesive communities with appropriate community infrastructure, having regard to the full range of local impacts that could arise as a result of likely changes to the climate;
- criteria 6 the contribution to be made from existing and new opportunities for open space and green infrastructure to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity;

In deciding on areas and sites to identify for development, priority should be given to those that will perform well against the criteria set out in paragraph 24. Where areas and sites perform poorly, planning authorities should consider whether their performance could be improved.“

6.48 PPS1 Supplement provides strong support for consideration of social sustainability in terms of the ability to create mixed and socially cohesive communities.

6.49 In addition Paragraph 38 of PPS3 Housing identifies that one of the factors Local authorities should account for in establishing the suitability of sites for housing is “The need to develop mixed, sustainable communities across the wider local authority area as well as at neighbourhood level”.

**Definitions**

6.50 The ATLAS Guide to the Planning of Large Scale Development published by DCLG and the Homes and Communities Agency provide definitions and criteria on how “mixed communities” should be defined<sup>6</sup>.

6.51 “Mixed and balanced communities

- Achieving a good variety of housing is key to the realisation of a successful mixed and socially sustainable community. This encompasses not just simply mixing sizes, types, tenures and price but also designing, building and promoting a development that attracts and supports a mix of different needs, households, spanning different ages, backgrounds and family structures.
- Mixed communities that are sustainable in the long term will also need a good range of amenities and services, as well as tangible links to the local economy, therefore it is important that these elements are also incorporated.
- When defining the mix, issues related to different typologies of housing and occupier profiles should be fully considered. For example, high proportions of smaller units within new communities, particularly apartments can result in a significant number of these being brought by private landlords as ‘buy-to-let’ units. Whilst these can play a useful role in helping

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[http://www.atlasplanning.com/page/topic/index.cfm?coArticleTopic\\_articleId=71&coSiteNavigation\\_articleId=71](http://www.atlasplanning.com/page/topic/index.cfm?coArticleTopic_articleId=71&coSiteNavigation_articleId=71)

address some housing needs (depending upon the rent levels set) excessive concentrations can lead to adverse impacts on community mix and stability due to a resultant disproportionately high transient population of mainly single people who are not able or motivated to take an active part in the community. Additionally, “buy-to-leave” investment, where investors acquire properties for their maturing asset value rather than the return can result in vacant properties which further mitigates against community development and cohesion.

- The housing type and tenure mix of any new emerging community will also directly affect the resultant demographic profile over time, and the associated social infrastructure needs arising from this. Changes to housing mix and profile will thus have knock-on impacts on community facility provision, which needs to be scoped and allowed for.
- When defining the appropriate mix for a site the following should be considered :
  - the need to avoid an overly large proportion of any particular tenure, particularly if concentrated within a discrete geographical area. To do so may not be in the interests of creating a fully diverse and vibrant community and may lead to future problems of management and stigma.
  - the likely impacts of the tenure/size mix on population profile and the ability of the development to provide the appropriate levels of social infrastructure at the right time.

The term socially cohesive communities relates to a slightly different term. The Home Office/ODPM guide on Community Cohesions defines it as follows

“Community cohesion’ is a relatively new concept which is usually defined as an alternative to segregation between social groups. However, community cohesion goes beyond spatial location to encompass overlapping values, positive perceptions and positive interaction between groups.<sup>7</sup>

**Evidence in Lambeth of the effect of cumulative effect of house conversions on the ability to sustain mixed and balanced communities**

6.52 Section 4 of this study has identified a range of information which establishes the link between the level of housing conversions and the issues described above.

**Intensity of development**

6.53 House conversions have the effect of increasing the intensity of development. Furthermore Section 4 identifies that population densities are greater within LSOAs with a higher proportion of Conversions compared with the rest of the Borough. A key issue is whether infrastructure especially public transport infrastructure can support higher densities.

6.54 Some London Boroughs including Southwark identify areas with good or very good public transport access (defined as PTAL level 4 or above) as suitable locations for house conversions. This is one possible option which may be appropriate to Lambeth.

**Mixed communities**

6.55 This study has analysed the social and demographic patterns at a fine grained (LSOA) level in order to establish how areas with higher concentrations of Conversions differ from the Borough as a whole and at what level of significance.

6.56 The profile of areas in terms of the sizes and types of dwellings is described above. In terms of tenure and affordability Conversions generally add to the supply of owner occupied or private rented stock as developments normally fall below the policy threshold requiring affordable housing. In addition those dwellings which are converted are normally from part of the supply of owner occupied or social rented dwellings.

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<sup>7</sup> Home Office/ODPM (2005) Community Cohesion: Seven Steps, a Practitioner's Toolkit. London: ODPM.

- 6.57 In terms of the profile of occupiers of areas with greater proportions of Conversions Section 4 has identified that there is no clearly distinguishable relationship in the pattern of:
- Family households
  - Ethnicity; or
  - Levels of deprivation.
- 6.58 However concentrations of conversions were closely associated with:
- Higher proportions of single person households. In particular, 7 clusters were identified where high concentrations of single person households coincided with streets where Conversions comprised more than 70% of properties;
  - Levels of overcrowding
  - Population turnover and the effect on community stability
- 6.59 Where there are multiple streets with a high level of conversions in close proximity to one another there is potential that the consequential effect of a more transient population and overcrowding of properties could impact detrimentally on the amenity of the local area as well as placing additional pressures on local infrastructure in terms of provision and maintenance requirements.
- 6.60 To manage these effects it may be appropriate to adopt an area based approach to the management of Conversion development to regulate the level of future Conversions.
- 6.61 The effect of Conversion development on social infrastructure provision notably schools and health provision is difficult to distinguish. It has been noted that those LSOAs with greater proportions of Conversions do not have a significantly different pattern of family households from the Borough generally.
- 6.62 Given the widely dispersed nature of Conversions in the Borough. It was not possible to identify or attribute pressures on local services specifically to areas with greater concentrations of Conversions. The impact on service provision is more closely related to the management and funding of service provision where for example the transient population and the relatively lower levels of registration with local GPs compares unfavourably with the actual use of local services and the ability for service providers to secure central funding for increasing provision.
- 6.63 At present the development of Conversions do not normally require planning Obligations towards education, health provision or other public facilities as most proposals generate fewer than 10 additional units. This is something that the Council should keep under review and perhaps require appropriate planning obligations from all developments with fewer than 10 dwellings perhaps through a unilateral undertaking.
- 6.64 A future policy approach going forward should address the cumulative effect of Conversions on the ability to sustain mixed and balanced communities.

### **Operational issues**

- 6.65 It is important that a future policy approach should be relatively clear and straight forward to implement in terms of its application and operation. The approach should not seek to overburden officers or applicants in terms of the level of resources required to prepare or submit applications.
- 6.66 Whilst the existing policy has been subject to a greater number of appeals than other London Borough's the Council has proven robust at appeal with only a small proportion of appeal decisions having been upheld. The policy approach going forward should have a similar or improved level of robustness.
- 6.67 It is important that the policy approach should be justifiable over time this should mean that the policy criteria are flexible and established at an appropriate scale and level of prescription in order that the policy does not become outdated.

6.68 The policy should avoid the risk of creating displacement effects. This may be an unintended side effect of a policy if for example an area based approach towards the regulation is adopted where the areas defined are inappropriately defined in terms of their number or size which then place additional pressure on areas which are located outside of defined areas.

## Policy Options

6.69 Based on the evidence gathered in Sections 2 - 5 several options for taking residential conversions have been developed, these include:

- Option 1 – Retention of the existing policy in its current form.
- Option 2 – Minor revisions to strengthen existing policy approach.
- Option 3 – Adopt a locational approach to the management of conversion activity including preferred locations for conversions, restraint areas and “managed” areas i.e the rest of eth Borough where appropriate mitigation may be required to accompany further conversion activity.
- Option 4 – Increase the threshold of dwellings eligible for conversion from 120 sq.m to 150 sq.m.
- Option 5 – Combining a restraint areas policy and raising the threshold.
- Option 6 - Removal of selected Permitted Development Rights.

6.70 The following options for taking forward the existing Conversion Policy are described below along with consideration of the performance criteria set out above.

### **Option 1 – Retention of the existing policy in its current form**

6.71 The first option is to retain the current policy unchanged. Whilst Policy 17 has been operating for some time the supporting SPD has only been adopted for under a year. This could suggest that it is too soon to identify clearly the effects of the new policy.

6.72 Whilst the current policy approach has proved successful in terms of its operational performance. It does not reflect some of the key issues identified within the updated evidence base.

6.73 In particular:

- Retaining the existing policy would not reduce the loss of larger family sized units in the Borough which are a significant component of local housing need;
- It would not fully take account of the cumulative effect of Conversions on local environmental capacity; and
- It would not fully take account of the cumulative effect of Conversions on the ability to build and sustain mixed and balanced communities.

### **Option 2 – Minor revisions to strengthen the existing policy approach**

6.74 This approach would seek to provide further criteria and justification in order to strengthen the policy to offer more protection for small family housing.

6.75 At present the policy is aimed at protecting small family sized accommodation, however although this is referred to in the justification to the policy it is not currently referred to in the policy wording. If Option 2 is taken forward the Council should consider making reference to the need to protect small family housing and retain larger family sized units in the Borough.

6.76 Strengthening of the definition of over-intensification to include additional reference to those factors identified in Sections 4 and 5 of this report which were found to be significant. With the exception of the reference to parking stress, Policy 17 does not take into consideration the

environmental amenity impacts of residential conversions and in particular the cumulative impacts of residential conversions.

- 6.77 Further additional criteria could be added to take account of factors relating to the ability to build sustainable communities.
- 6.78 This approach would address some of the issues which have been identified within the updated evidence base. However, the policy may have little effect on reducing the loss of family housing without the inclusion of clearer thresholds or defined areas to regulate Conversion development. Similarly the effect of the policy on regulating cumulative effects relating to environmental capacity and the ability to build and sustain mixed and balanced communities may lack effectiveness without this being linked to clearly defined areas or criteria.

**Option 3 – Increase the threshold of dwellings eligible for conversion from 120 sq.m to 150 sq.m**

- 6.79 The current UDP has a property size threshold of 120 sq.m. Section 2 identified numerous other Borough’s with conversion policy size thresholds ranging from 120 – 160 sq.m. Increasing the threshold, increases the amount of family sized housing protected. The Draft Core Strategy (April 2009) identified the option to improve protection of family homes by raising the minimum threshold for dwellings which are eligible for Conversion from 120 sq.m to 150 sq.m as follows:
- 6.80 “Policy S2 (f) Protecting all family sized homes from conversion into flats in parts of the borough under conversion stress, and protecting family sized homes of less than 150 square metres 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.”
- 6.81 The merits of this approach have been considered in the light of the findings of this study including its effect on housing supply and the contribution towards safeguarding family sized units.

**Rationale for increasing the size threshold**

- 6.82 The rationale for raising the size threshold from 120 sq.m to 150 sq.m unextended floor area is to remove those properties with a floor area of 120-150 sq.m from those eligible for conversions. This would have the benefit of increasing the stock of housing protected from conversion by 6,769 (5% of total housing stock).
- 6.83 With an eligibility threshold of 120 sq.m it is possible for two x two bedroom flats to be created from a convertible property. When the threshold is raised to 150 sq.m it is possible to create two x three bedroom properties subject to physical layout and design parameters taking account of the Councils Residential Development and Conversions SPD and relevant Homes and Communities Agency and Mayor of London standards.
- 6.84 If the goals of the policy and supporting SPD relating to the provision of a mix of unit sizes are applied effectively to conversions coming forward then the provision of family sized accommodation can more easily be retained (those properties greater than 120sq.m but less than 150 sq.m). In addition those properties above 150 sq.m which are converted would be adding to the supply of three bed + units despite the subdivision of large sized properties.
- 6.85 Securing an appropriate mix of unit sizes is something which could be achieved under the existing policy approach (Policy 15 and Policy 17). However, through the operation of the existing policy a high proportion of one bed units are being delivered and very few units with three bedrooms or more which suggests that the current approach is not proving effective.
- 6.86 Through the review of other London Boroughs the eligibility thresholds used within policy vary between 120 sq.m and 150 sq.m. At present of ten Boroughs in the sample that currently have a minimum size threshold three others used the 120 sq.m, four had a threshold of 130 sq.m, one had a threshold of 140 sq.m (in areas of parking stress) and Wandsworth had a threshold of 150 sq.m in areas of restraint whilst retaining a 120sq.m threshold in the rest of the Borough.

6.87 LB Wandsworth is in the process of revising its policy approach by establishing a minimum eligibility threshold of 150 sq.m across the whole Borough to replace the existing restraint areas approach.

6.88 Within Lambeth the effect of removing eligibility of those properties sized between 120 sq.m and 150 sq.m would be to reduce the number of unconverted dwellings capable of conversion by some 6,769 units (refer to Table 3.2). This represents a reduction of some 20% of the overall supply of unconverted dwellings with conversion potential or 5% of total dwellings in the Borough.

**Impact on housing supply and safeguarding larger family sized units**

6.89 Increasing the threshold of eligibility would have the effect of safeguarding 6,769 family sized units between 120 sq.m and 150 sq.m this represents the equivalent of some 1.54 years of overall demand/supply for larger three and four bed family sized units and would support the delivery of the Councils Housing Strategy.

6.90 The benefits of raising the eligibility threshold to 150 sq.m is that a significant number of family sized dwellings are safeguarded within the Borough.

6.91 The justification for establishing a limit at 150 sq.m is that there is potential for conversions of dwellings of this size or more to form two units of at least 3 bedrooms in size.

6.92 The disadvantage of such an approach is that there would be a reduction in the supply of one and two bed flats resulting from the conversion of dwellings between 120-150 sq.m which would have a small impact on the supply of dwellings in the Borough (the % of applications which relate to properties between 120-150 sq.m is not known).

6.93 The other disbenefit is that establishing a policy purely relating to the size of the property does not take account of the cumulative effect of Conversions within an individual street or area. The policy is indiscriminate and may preclude conversions within streets where there may be adequate potential without creating significant harm to environmental and parking conditions nor affecting the maintenance of mixed and balanced communities.

**Option 4 – Adopt a locational approach to the management of conversion activity**

6.94 This option would adopt a locational approach towards the management of Conversion development. The approach would have three tiers as defined below.

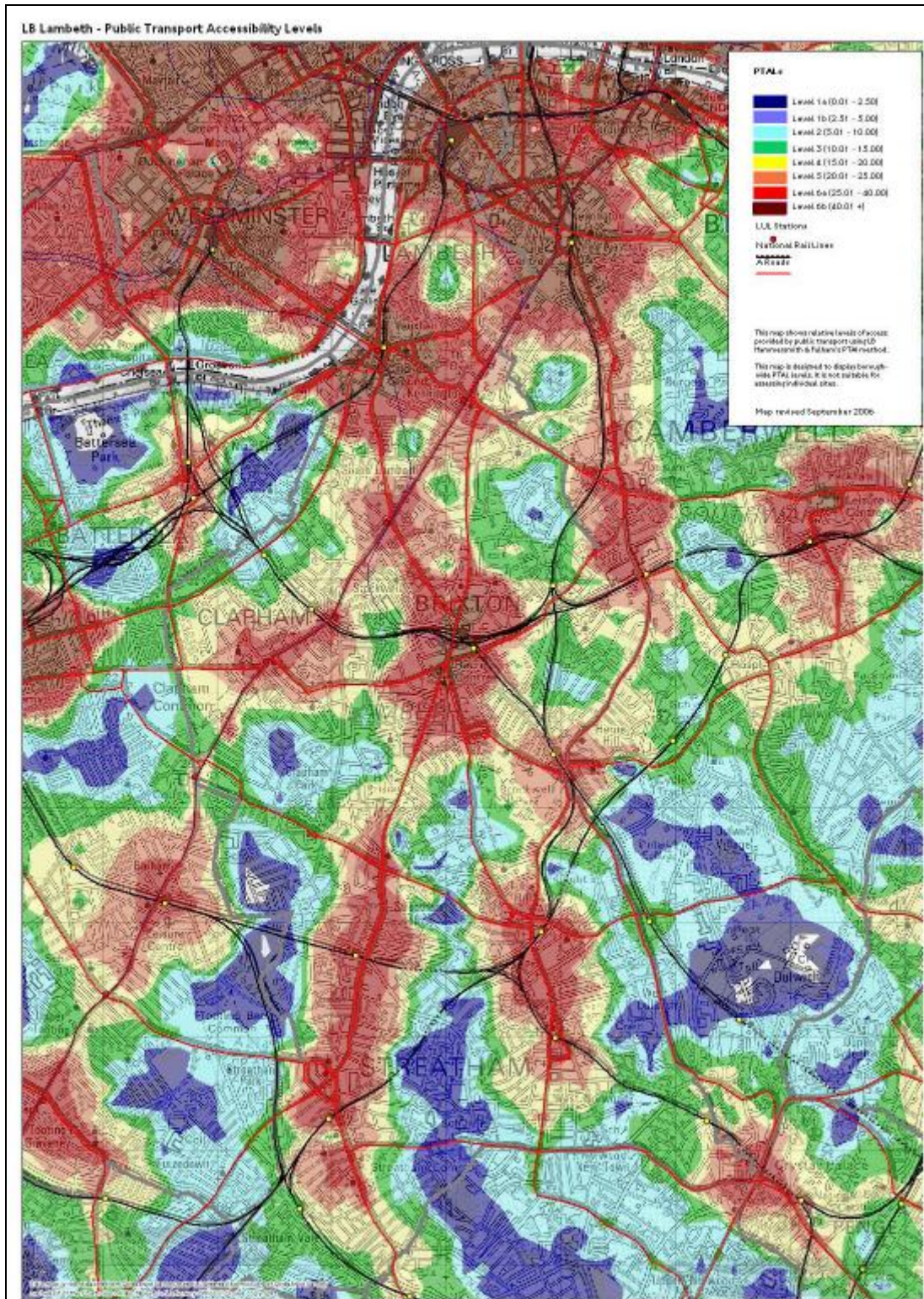
**Preferred locations**

6.95 These are locations where in principle Conversions are normally permitted subject to the existing policy criteria relating to design and acceptability in planning terms. These could be defined as those areas which have good or very good public transport provision as defined by having a PTAL level of 4 or above. These areas are defined in Figure 6.1 below.

6.96 An alternative approach to defining preferred locations would be to relate this to areas that are less suited to family accommodation such as Vauxhall and Waterloo London Plan Opportunity Areas, the borough’s major, district and local town centres and existing residential neighbourhoods, subject to site suitability, access to transport and impact on amenity. The disadvantage of preferred locations is that over time the mix and balance of communities will change, with fewer and fewer families living in these areas.

6.97 Defining preferred locations on the basis of PTAL has the advantage of concentrating development in areas of good public transport accessibility, however it does not take account of the existing concentration of conversions, the existing level of family sized housing in these area, or the existing environmental or amenity issues in the area. Therefore defining preferred locations would have to include a consideration of the existing level of conversion activity (as shown in Figure 3.2).

Figure 6.1 – Public Transport Accessibility Levels (2006)



### Restraint areas

- 6.98 These are locations which do not have an acceptable level of public transport provision to enable further significant intensification of development to take place through conversion activity and where a significant level of Conversions has taken place in the past and where the cumulative effect of past conversions means that there is no capacity for further Conversions to be



accommodated without exceeding limits relating to local environmental capacity and amenity, the ability for an area to sustain a mixed and balanced community and parking stress.

- 6.99 It will be important that any future policy approach dealing with residential conversions, takes account of the conversion activity that has already taken place in the street or area near to the proposed application site. One way of taking account of existing residential conversion activity is to identify areas of restraint. Restricting Conversions within such areas would have the effect of protecting existing family housing within these areas therefore contributing towards providing a variety of housing sizes at neighbourhood and borough level.
- 6.100 No further conversion activity would be permitted within such areas unless it can be demonstrated that the proposed development would not have a net effect on local environmental capacity and amenity, the ability for an area to sustain a mixed and balanced community and parking stress.
- 6.101 The policy would apply at street level and a list of streets and a map would define those streets which are included within such a policy (the list of streets is shown in Appendix B).
- 6.102 Table 6.3 and illustrate the impact on the number of unconverted properties that could be converted depending on the threshold used for setting the policy.

**Table 6.3 – Effect of a Conversion Restraint Area policy on the number of streets and unconverted properties which are protected**

Policy Threshold	No. Streets	% Streets in Borough	No. Properties protected (120 sq.m)	% Overall dwellings eligible for conversion (120 sq.m minimum size)	No properties protected (150sq.m Min size)	% Overall dwellings
Streets where >90% Existing properties with potential for conversion already converted	62	4%	212	1%	6,958	21%
Streets where >80% Existing properties with potential for conversion already converted	135	9%	1,014	3%	7,639	23%
Streets where >70% Existing properties with potential for conversion already converted	211	15%	2,471	7%	8,703	26%
Streets where >60% Existing properties with potential for conversion already converted	287	20%	4,283	13%	10,100	30%
Streets where >50% Existing properties with potential for conversion already converted	362	25%	6,395	19%	11,570	35%

- 6.103 Figure 6.2 shows the number of properties in a street that are ‘eligible’ for conversion (i.e they are above the 120 sq.m property size threshold), whilst Figure 6.3 shows the number of properties in a street that would be eligible for conversion if the property size threshold is increased to 150 sq.m.

**Establishing the level of significance**

- 6.104 Analysis of environmental and amenity and social indicators in Section 5 has shown that there is clear evidence that as the level of residential conversions in the street increases the intensity of environmental and amenity issues increases. For several indicators there is a ‘tipping point’ where once a certain percentage of properties in a street have been converted the environmental issues increase significantly. The tipping point for environmental indicators varies depending on the indicator and ranges from over 50% of properties converted to over 70%.

- 6.105 It is suggested that a 70% threshold would be the most defensible as this would be supported by the greatest number of indicators. With reference to Table 6.3 up to 211 streets within the Borough would be included within such a policy (15% of the total). The policy would have the effect of protecting around 2,471 properties. Figure 3.2 identifies streets within each of the conversion categories.
- 6.106 Establishing the threshold at this level could be viewed as protecting areas where issues associated with Conversion development are already being experienced. The policy would stop the effects worsening and protect a limited proportion of unconverted family sized units.
- 6.107 However, establishing the threshold at a lower level of 50% or 60% would represent taking a precautionary approach towards areas close to the threshold of experiencing the cumulative effects of Conversions. This would safeguard a greater proportion of family sized dwellings and would ensure that issues do not become an approach to the future.
- 6.108 Setting the policy threshold at a lower level would also prove more robust over time as it would not require new streets to be added to restraint areas as the level of Conversion development increases.
- 6.109 An area or percentage threshold based approach to regulating housing Conversions is currently used by other London Boroughs. The Haringey UDP operates a policy where further Conversions are restricted in streets where more than 20% of properties are already converted.
- 6.110 Wandsworth also defines Conversion Restraint Areas which has worked well. However within their LDF the Council are moving away from an area based approach as the pattern of Conversions is more dispersed. Instead they are increasing the threshold of eligibility which will remove the potential for conversion from unconverted dwellings with an area less than 150 sq.m in order to protect family housing in the Borough.

**Effect on housing supply**

- 6.111 The approach to managing conversions should not compromise the delivery of housing and affordable housing or the Council meeting its housing requirements as there is substantial housing development in the pipeline and future supply identified in the SHLAA.
- 6.112 At 50%, 60% and 70% thresholds conversion restraint areas would remove 2,471 (7%), 4,283 (13%) or 6,395 (19%) of unconverted dwellings respectively from the possible supply of dwellings with potential for conversion.
- 6.113 The number of dwellings excluded from conversion activity by such a policy would represent a relatively small proportion of the overall stock of dwellings with potential for conversion.
- 6.114 The 70% threshold is considered to have a marginal effect on the overall supply of opportunities for conversions in the Borough. The 50% and 60% threshold would have a greater effect in safeguarding streets before significant impacts associated with concentration of conversions occur.

**Effect on the stock of opportunities for larger family sized units**

- 6.115 The housing needs study identified an annual requirement for some 4,386 larger market (three and four bed family sized units) within the Borough. The effect of the Conversions policy would represent safeguarding the supply of larger family sized units.
- 6.116 It should be recognised that the supply of larger family sized market units in the Borough is not only concentrated within areas with concentrations of housing conversions. However, the policy will have an effect on reducing the depletion of units of this size in the Borough.

**Operational effects.**

- 6.117 The potential for displacement effects is an important issue when considering the effect of a Conversion Restraint Areas policy. If too many areas are identified then additional pressure will be placed on those streets not included within the policy area which may include similar nearby

streets which are similar in terms of their characteristics other than the proportion of houses converted which would be undesirable.

- 6.118 To overcome pressure for conversion on those streets outside the Conversion Restraint areas it may be appropriate to increase the number of streets within Conversion Restraint areas to form contiguous areas which would reduce the risk of a displacement effect. This would mean designating larger areas such as those shown on Figure 3.3 to define the boundaries of areas.

### Option 5 Combining a restraint areas policy and raising the threshold

- 6.119 A further policy option would be to combine a restraint areas policy with an increase in the eligibility threshold to 150 sq.m (i.e dwellings which are located outside of restraint areas but are between 120 and 150 sq.m would also be protected). The effect of this option on housing supply is shown in the last two columns of Table 6.3 above.
- 6.120 Table 6.4 compares the effect of raising the eligibility threshold from 120 sq.m to 150 sq.m assuming it is combined with a restraint area policy (50% Conversion intensity threshold). The policy would lead to a reduction of 9,814 properties eligible for conversion over an above the 6,395 protected by a restraint area policy (assuming a 50% threshold).
- 6.121 Figure 6.4 shows the effect of combining a restraint areas policy (50% conversion threshold) with the existing eligibility threshold of 120 sq.m. Figure 6.5 shows the effect of combining a restraint areas policy with an increased eligibility threshold of 150 sq.m. Both figures show restraint areas / streets in grey, main roads (which are generally considered unsuitable for family accommodation) are shown in yellow. For those streets outside restraint areas the number of properties still eligible for conversion (i.e over the 120 sq.m or 150 sq.m threshold) are identified.

**Table 6.4 – Change in No. Streets with properties eligible for conversion and total properties eligible for conversion**

No. Properties in Street	No streets with eligible properties for conversion (120 sq.m threshold)	No streets with eligible properties for conversion (150 sq.m threshold)	Change in Streets with properties eligible for conversion compared with 120 sq.m threshold	No. Properties protected through threshold change over and above those protected by restraint area (50% threshold)
Streets with no properties eligible	514	785	271	0
1 to 5	228	113	-115	489
6 to 10	85	49	-36	571
11 to 20	83	49	-34	1,142
21-30	53	27	-26	1,269
31-40	31	18	-13	1,077
41-50	31	15	-16	1,357
51-60	19	4	-15	1,040
61-70	9	4	-5	585
71-80	3	4	1	217
81-90	4	4	0	329
91-100	7	0	-7	656
101+	9	4	-5	1,082
<b>Total</b>	<b>1,076</b>	<b>1,076</b>	<b>0</b>	<b>9,814</b>

### Rest of the Borough – Managed Development

- 6.122 For those areas outside the preferred areas and areas of restraint the normal policy approach is likely to apply as per Option 2. In these areas of more limited potential or where the level of conversion activities has not reached significant levels requiring further protection or restraint the approach to managing conversions would be similar to the current approach.

- 6.123 To avoid the creation of issues associated with cumulative Conversion development, it is recommended that the Council could use Planning Obligations for developments of less than 10 dwellings including Conversion to secure contributions for the following:
- Environmental improvements to make the development acceptable in terms of likely impact on the street scene;
  - Contributions towards the establishment of on street spaces for Car Clubs in order that the tendency for overcrowding within housing with greater number of Conversion does not create parking stress;
  - Contributions towards parks and open space provision, and other social and community facilities (such as libraries and recreation facilities) in recognition of the additional impact.

- 6.124 To ensure such an approach is practicable it is recommended that a standardised unilateral undertaking form is created for the purposes of securing contributions. However, unilateral undertaking is voluntary and therefore the Council may wish to seek S106 planning obligations instead.

### **Option 6 – Removal of selected Permitted Development Rights**

- 6.1 Permitted development rights are set out in the Town and Country Planning (General Permitted Development) Order 1995 (GDPO). Permitted development rights allow minor changes to a dwelling without the need to apply for planning permission. The GPDO was amended in 2008, this changed the type of development that is permitted under the order. The intention of the amendments was to reduce some of the pressure on the planning system that has resulted from a large amount of ‘householder’ applications.
- 6.2 The Council is aware that there have been instances in Lambeth where developers/ householders have used the full extent of permitted development rights (to enable rear extensions and loft conversions) prior to applying for permission for conversion under both the new and old GPDO system. This has the effect of circumventing Lambeth UDP Policy 17(b) which states that: “Flat conversion schemes should avoid large extensions to increase habitable floorspace, particularly at roof level, where this is for the primary purpose of increasing the number of units to be provided” as such form of development in isolation is permitted development. This issue means that the possibility of restricting permitted development rights and the implications of doing needs to be considered.
- 6.3 Permitted Development Rights give permission for development within prescribed limits. The only mechanism for removing this rights is through the introduction of an Article 4 direction which can specify elements of Permitted Development Rights to be removed with the effect that householders would then have to apply to the Council (with no application fee) for permission to undertake these types of works.
- 6.4 Currently, Article 4 of the GPDO provides for the following forms of direction:
- under Article 4(1) a LPA can restrict any permitted development rights (except Class B of part 22 (mineral exploration) or Class B of part 23 (removal of material from mineral-working deposits). It is not the subject of public consultation.
  - A Direction usually takes effect once approved by the Secretary of State, unless it is a Direction to which 5(4) applies and notice has been served on the occupier or owner of the land to which the Direction relates.
  - under Article 4(2) a Direction can be used to restrict certain permitted development rights in Conservation Areas. The Direction must be subject to at least 21 days consultation, but does not need Secretary of State approval. It comes into force on the date on which notice is served on the owner or occupier or notice is published, but it expires after 6 months unless confirmed. The Direction can be confirmed no sooner than 28 days after public consultation began.

- article 5(4) allows for immediate restriction of certain permitted development rights. It does not require public consultation and has a six month life unless approved by the Secretary of State.

- 6.5 Article 4 Directions are normally used to protect areas of special character or interest from unsympathetic extensions such as Conservation Areas. Circular 9/95 specifies that permitted development rights should only be withdrawn in exceptional circumstances and that such action is rarely justified unless there is a real and specific threat. Under the current system the Council may be required to pay compensation in circumstances where you cannot obtain planning permission for development which otherwise would be treated as permitted development. However a recent Government consultation “Improving Permitted Development” published in July 2009 looked at the possibility of removing compensation and introducing a requirement for a 12 month pre-consultation period.
- 6.6 Even when Permitted Development Rights are removed planning permission can still be sought to extend a property for the type of development previously allowed under Permitted Development. The Council would have no way of knowing at the time of application whether it was the applicants’ intention to sub divide the property into flats at a later date and it would be difficult to justify withholding planning permission on this basis nor sustain this at appeal. Extension of existing property is required to meet legitimate and appropriate needs of family households for more space.
- 6.7 Investigation of this issue has not revealed examples where Local Authorities have opted to exercise Article 4 Directions other than in connection with Green Belt and Conservation Areas and it is considered that the operational difficulties already identified above indicate that it would be difficult to demonstrate the need for such a direction.
- 6.8 It is not possible to establish how many properties have been extended under Permitted Development prior to conversion and whether this has the effect of increasing the number of units provided or increasing the size of the units provided. If the primary concern is the number of units provided this is addressed through other criteria e.g. within a policy on space standards as in Lambeth’s SPD.
- 6.9 As with any policy the operation of appropriate planning enforcement should ensure that the Policy is effective.

## Conclusion

- 6.10 This study has identified that although conversions are an important part of the supply of housing units they can have negative effects on environmental quality and local amenity and can have an impact on the supply of family sized housing. Therefore residential conversions should not be allowed where they would impact on the ability to maintain balanced and sustainable communities.
- 6.11 Numerous London Borough’s (see Section 2) have policies that control residential conversions, the approaches used include: identifying areas that are suitable for conversion; identifying areas that are unsuitable for conversion; or imposing a property size threshold to limit the properties that are eligible for conversion.
- 6.12 Lambeth’s existing residential conversion policy has been reasonably successful to date at appeal. Although Lambeth has had some success in restricting conversions, there are concerns that the concentration of conversions in certain areas has had a detrimental effect on environmental quality and amenity. Therefore, the existing policy framework needs strengthening to prevent further environmental degradation.
- 6.13 Analysis of Lambeth’s housing stock (see Section 3) has identified that significant conversion activity has taken place in recent years and that the stock of remaining unconverted houses is now only 26% of all properties. Half of the remaining unconverted properties would be eligible for conversion under the existing Lambeth policy approach, meaning that there is potential for further loss of family housing.

- 6.14 The street audit undertaken as part of this study (see Section 5) has shown that there is a correlation between the proportion of conversions and incidences of negative environmental quality and local amenity indicators. Those streets with higher levels of residential conversions have more negative indicators than those areas with fewer or no conversions. In addition analysis of socio-economic indicators (Section 4) shows increased incidences of overcrowding in areas of greatest residential conversions.
- 6.15 The evidence set out in Sections 2-5 of this study suggests that a more restrictive approach to residential conversions is required in Lambeth, to ensure that the impacts of conversions are limited.
- 6.16 This Section sets out some policy options that could be used to prevent over intensive conversions and maintain a mixed and balanced community whilst also ensuring that the Borough could continue to meet its housing targets.
- 6.17 The study identifies six policy options including; retaining the existing policy approach; making minor revisions to the existing policy approach; increasing the policy size threshold from 120 sqm to 150 sqm; adopting a locational approach to the control of conversions (restraint areas or preferred locations); combining restraint areas and raising the size threshold; and removing selected permitted development rights.
- 6.18 Each of the policy measures identified have been examined against a set of criteria, and the issues raised by each of the policy measures have been assessed. Option 1: retaining the existing policy approach, would not have an impact on the issues that have been raised in this report (i.e. loss of family sized housing and environmental issues). Option 2: minor revisions to the existing policy may have some impact on environmental impacts but would not have significant impact on reducing the loss of family housing. Option 3: increasing the policy threshold would reduce the supply of houses eligible for conversion and would therefore assist in the retention of family sized housing. Option 4: adopting a preferred locations approach could be used to allow conversions in areas that are suitable for conversions, however it may be difficult to define which areas are suitable for conversion and there is a danger that there are impacts on the balance and mix of communities, adopting restraint areas may be more appropriate than preferred locations as this has the advantage of restricting conversions in areas that are already suffering the impacts of conversions. Option 5: combining a restraint areas policy with raising the size threshold, would have the greatest impact on the loss of family housing (as it would restrict conversions for the greatest number of unconverted houses) and would have the advantage of protecting areas already suffering the impacts of conversions from further conversions. Option 6: restricting permitted development rights, is not considered to be an appropriate way of controlling residential conversions.
- 6.19 In the light of the above the report recommends that the best approach would be to draft a policy or policies that use a combination of policy options 3 or 4 tailored to protect and encourage mixed, balanced and sustainable communities in the Borough using the evidence set out in this report.

# Appendix A - Audit Proforma

# Lambeth Housing Conversions Study: Site Audit Proforma

## Site Details

Survey Date & Time \_\_\_\_\_

Street Name \_\_\_\_\_

Cluster No \_\_\_\_\_ Surveyor \_\_\_\_\_

## Property Condition

### 1. Predominant street character (Tick one)

Largely purpose built flats	Largely unconverted houses	Largely flats or maisonettes in converted residential property	No one category dominates

### 2. Maintenance and upkeep of the external building façade (rendering, window frames, brickwork, roof)

	<10%	10-20%	20-30%	30-40%	40-50%	50%+
% Poor Condition						

### 3. Unsympathetic alterations and front/side/roof extensions not in keeping with the character of the property or damage or alteration of features (brickwork, cornices, period porches, steps and pathways)

	<10%	10-20%	20-30%	30-40%	40-50%	50%+
% Properties affected						

### 4. Property sizes

	Small properties (flats, maisonettes, terraces)	Medium sized properties (larger terraces, semi detached with limited outside space)	Larger properties (Detached and other properties with significant outside space)
Mix to nearest 10%			

### 5. Perception of potential for intensification of unconverted dwellings

High                  Medium                  Low



**External space**

**6. Presence of front garden**

	No front garden space	External front garden space wholly used for parking	Mix of hardstanding for parking and garden space	Front garden not used for parking
% Properties to nearest 10%				

**7. Upkeep of external areas**

	<10%	10-20%	20-30%	30-40%	40-50%	>50%
% Properties with poorly maintained external space						

**8. Presence of defined boundaries and thresholds (walls, gates, railings fences)**

	0-20%	20-40%	40-60%	60-80%	80-100%
% Properties without defined front boundary					

**9. Upkeep of boundaries and thresholds (walls, gates, railings fences)**

	<10%	10-20%	20-30%	30-40%	40-50%	>50%
% Properties with boundaries in poor condition						

**10. Evidence of clutter (multiple satellite dishes, wheelie bins, utility meters rubbish)**

	<10%	10-20%	20-30%	30-40%	40-50%	>50%
% Properties with evidence of visually intrusive clutter						

**11. Evidence of dumping, uncollected large items, cars under repair within the curtilage or on the street**

No. Occurrences	None	1-2	3-4	5+
Severity of problem				

**Street Quality**

**12. Presence of street trees**

	None	Few specimens	Immature Avenue	Fully matured Avenue
Presence of street trees				

**13. Presence of public/semi public amenity greenspace**

	Yes	No
Presence of amenity areas		

**14. Condition of amenity areas**

	Very Poor	Poor	Fair	Good	Very Good
General Condition					

**Access and parking**

**15. Road Type**

Main road	Distributor	Residential Street	Cul de sac/No through route

**16. Traffic management scheme (One way street, speed humps, home zone).**

Yes/No

Comments
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**17. Parking restrictions**

Yes/No

**18. Parking problems at time of survey**

	No spaces available	<10 % available	10 – 20% available	20- 30% available	>30% available
General Condition					

Comments
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## Appendix B – Streets included within a Potential Conversion Restraint Area Policy

Table B.1 – Streets included within Restraint Area Policy Options

Street	No. Properties	Total dwellings with potential for conversion originally	% dwellings with potential for conversion already converted	No. Properties >120 sq.m Protected*
HONEYBROOK ROAD	117	111	50	52
UNION GROVE	495	2	50	1
STAMFORD STREET	101	2	50	0
MINET ROAD	19	2	50	1
PRESCOTT PLACE	9	2	50	1
TURNCHAPEL MEWS	6	4	50	1
INGLIS STREET	4	4	50	2
COWTHORPE ROAD	13	10	50	0
LITTLEBURY ROAD	95	14	50	4
GRASMERE ROAD	34	22	50	2
STREATHAM HIGH ROAD	1,194	52	50	4
HORSFORD ROAD	78	78	50	25
CAMBERWELL NEW ROAD	149	136	50	39
HASELRIGGE ROAD	103	79	51	9
SHANDON ROAD	75	75	51	35
UPPER TULSE HILL	394	130	51	21
HOLMEWOOD GARDENS	194	106	51	52
CHESTNUT ROAD	147	122	52	57
THORNBURY ROAD	95	91	52	36
TRINITY RISE	188	145	52	63
SELSDON ROAD	89	79	52	30
THORPARCH ROAD	87	50	52	3
BIRKBECK HILL	48	48	52	13
RATTRAY ROAD	122	111	52	44
LANSDOWNE WAY	230	65	52	23
LYNETTE AVENUE	111	110	53	52
ELM PARK	178	159	53	29
BRANKSOME ROAD	121	121	53	50
MAPLESTEAD ROAD	34	32	53	6
MILKWOOD ROAD	231	201	53	26
HAWARDEN GROVE	65	61	54	28
THURLBY ROAD	73	48	54	20
HILLSIDE ROAD	115	35	54	9
SIBELLA ROAD	51	46	54	21
PATHFIELD ROAD	223	156	54	63
TURNEY ROAD	54	33	55	15
MOORLAND ROAD	65	31	55	3
KEPLER ROAD	44	31	55	7
LANERCOST ROAD	101	93	55	42
BEECHDALE ROAD	82	82	55	37
CHELSHAM ROAD	121	109	55	49
LAMBETH ROAD	78	58	55	22
ALDEBERT TERRACE	67	67	55	29
BALDRY GARDENS	215	134	55	59
VAUXHALL STREET	373	9	56	2

ST FAITHS ROAD	63	63	56	15
KNATCHBULL ROAD	125	104	56	28
CRESCENT GROVE	84	68	56	29
UPSTALL STREET	25	25	56	11
HARPENDEN ROAD	107	98	56	26
DALBERG ROAD	163	155	56	67
ELDERWOOD PLACE	70	55	56	0
BIRKBECK PLACE	46	46	57	5
CLARIBEL ROAD	53	53	57	23
STOCKWELL GREEN	112	51	57	16
RECTORY GROVE	138	86	57	25
HAMBALT ROAD	186	186	57	79
MILTON ROAD	108	107	57	33
NORFOLK HOUSE ROAD	146	142	57	57
FENWICK PLACE	112	7	57	0
GARRADS ROAD	42	7	57	3
KINGSWOOD ROAD	199	98	57	27
KEMPSHOTT ROAD	123	121	58	35
BARCOMBE AVENUE	308	181	58	76
ST STEPHENS TERRACE	72	43	58	18
KESTREL AVENUE	96	96	58	40
ABBEVILLE ROAD	291	200	59	80
FAIRMOUNT ROAD	88	82	59	34
DORSET ROAD	624	46	59	11
MERVAN ROAD	93	92	59	38
APPACH ROAD	100	100	59	39
SUDBOURNE ROAD	179	164	59	50
WOLFINGTON ROAD	132	128	59	52
KINGSCOURT ROAD	181	178	60	70
HERON ROAD	49	47	60	5
KILDORAN ROAD	66	62	60	20
PEARMAN STREET	82	77	60	16
ST JULIANS FARM ROAD	221	214	60	73
MOUNT EARL GARDENS	160	5	60	1
LOTHIAN ROAD	136	30	60	6
FIVEWAYS ROAD	56	40	60	0
NORTHBOURNE ROAD	55	45	60	15
GRAFTON SQUARE	94	85	60	34
THURLESTONE ROAD	125	123	60	47
BECMEAD AVENUE	118	113	60	45
PRENTIS ROAD	73	63	60	25
BECONDALE ROAD	53	53	60	8
POYNDERS ROAD	115	48	60	12
FENTIMAN ROAD	239	231	61	82
BLAKEMORE ROAD	24	23	61	9
CHAUCER ROAD	117	105	61	38
BARROW ROAD	240	147	61	50
KIRKSTALL ROAD	153	142	61	40
OLD SOUTH LAMBETH ROAD	34	13	62	5
CAUTLEY AVENUE	91	76	62	29
MOUNT VILLAS	33	21	62	0
BEARDELL STREET	21	21	62	3
LARKHALL RISE	169	126	62	46

ST MARTINS ROAD	73	50	62	19
OFFERTON ROAD	50	50	62	18
GOLDSBOROUGH ROAD	91	29	62	4
SPENSER ROAD	114	103	62	31
AUCKLAND HILL	227	127	62	14
RADCOT STREET	16	16	63	6
LISTON ROAD	40	32	63	12
KENNINGTON LANE	478	72	63	18
WANDSWORTH ROAD	1,113	203	63	27
FERNWOOD AVENUE	83	83	63	29
ENDYMION ROAD	182	129	63	30
ARLESFORD ROAD	63	62	63	21
HELIX ROAD	171	170	63	63
FOXLEY ROAD	127	127	63	0
KEMERTON ROAD	70	65	63	19
SHARDCROFT AVENUE	19	19	63	7
CONYERS ROAD	122	109	63	28
BROMELLS ROAD	140	30	63	5
BRAYBURNE AVENUE	97	97	64	35
NEALDEN STREET	53	25	64	5
LOUGHBOROUGH PARK	619	114	64	23
POMFRET ROAD	16	14	64	5
CLAPHAM PARK ROAD	267	56	64	10
BROXHOLM ROAD	221	216	64	46
DODBROOKE ROAD	32	31	65	6
BRADING ROAD	82	54	65	11
SOUTH LAMBETH ROAD	551	189	65	59
HANNINGTON ROAD	26	26	65	9
MACAULAY ROAD	137	78	65	16
SOLON ROAD	139	139	65	27
TEMPLAR STREET	35	29	66	10
PARK HALL ROAD	143	102	66	33
LEIGHAM VALE	164	157	66	38
HUBERT GROVE	213	211	66	64
BUCKLEIGH ROAD	119	113	66	25
PADFIELD ROAD	9	9	67	3
IRVING GROVE	12	12	67	2
THORNCLIFFE ROAD	21	18	67	2
WOODLAND HILL	45	45	67	14
KENNINGTON PARK ROAD	374	48	67	13
KILLIESER AVENUE	115	108	67	35
PARK HILL	208	118	67	26
THORNLAWS ROAD	235	234	67	56
POLWORTH ROAD	129	74	68	12
THORNE ROAD	71	25	68	4
STANSFIELD ROAD	75	75	68	24
RAEBURN STREET	48	47	68	15
EDGELEY ROAD	353	91	68	27
ANGLES ROAD	91	91	68	21
GREYHOUND LANE	212	161	68	29
FAIRMILE AVENUE	71	70	69	17
KILLYON ROAD	138	134	69	41
DALYELL ROAD	185	182	69	50

STRATHLEVEN ROAD	171	147	69	24
ST MICHAELS ROAD	46	45	69	14
BROMFELDE ROAD	103	97	69	30
NEWBURN STREET	238	13	69	2
WINTERWELL ROAD	39	39	69	12
BRANCASTER ROAD	36	36	69	10
BURNLEY ROAD	46	46	70	14
HELIX GARDENS	46	46	70	14
BABINGTON ROAD	234	155	70	32
TRADESCANT ROAD	130	119	70	35
HOLMEWOOD ROAD	73	73	70	22
LEANDER ROAD	272	268	70	80
CHANTREY ROAD	81	81	70	24
KNOLLYS ROAD	415	275	71	35
SOUTHWELL ROAD	144	126	71	19
HARLEYFORD ROAD	99	65	71	4
LEIGHAM AVENUE	309	48	71	0
PLATO ROAD	74	72	71	21
RYDAL ROAD	62	62	71	18
BROOK DRIVE	123	114	71	17
CRASTER ROAD	83	83	71	22
DREWSTEAD ROAD	206	201	71	52
CONCANON ROAD	65	59	71	17
SANTLEY STREET	93	87	71	19
VOLTAIRE ROAD	143	67	72	15
VAUGHAN ROAD	58	46	72	3
HAYCROFT ROAD	46	46	72	13
NORTHANGER ROAD	28	25	72	7
COTHERSTONE ROAD	25	25	72	7
FERNDALE ROAD	578	326	72	62
WHITELEY ROAD	128	127	72	29
JASPER ROAD	60	40	73	1
KENNINGTON OVAL	304	11	73	3
HARBOROUGH ROAD	110	11	73	3
STERNHOLD AVENUE	198	119	73	23
BOURNEVALE ROAD	67	56	73	14
WESTWELL ROAD	87	86	73	23
MILVERTON STREET	15	15	73	4
TELFORD AVENUE	250	139	73	35
UNION ROAD	235	64	73	15
CLITHEROE ROAD	51	42	74	6
CORRANCE ROAD	139	126	74	27
GROVEWAY	84	69	74	16
THE CHASE	236	216	74	55
ACRE LANE	323	143	74	10
GIPSY ROAD	373	239	74	18
ARLINGFORD ROAD	150	149	74	36
TINTERN STREET	63	63	75	7
STANTHORPE ROAD	198	170	75	37
DURHAM STREET	11	4	75	0
DUMBARTON ROAD	97	32	75	8
AVENUE PARK ROAD	36	36	75	9
LEWIN ROAD	295	250	75	57

GLENEAGLE ROAD	371	308	75	61
GRESHAM ROAD	176	65	75	2
DUCIE STREET	62	61	75	15
MOORCROFT ROAD	30	29	76	7
THIRLMERE ROAD	58	58	76	10
PAULET ROAD	221	112	76	24
BEDFORD ROAD	192	104	76	15
GUILDFORD ROAD	248	50	76	11
GATELEY ROAD	75	75	76	18
CAVENDISH ROAD	383	347	76	70
MALEY AVENUE	42	42	76	9
BELLEFIELDS ROAD	77	63	76	14
STOCKWELL TERRACE	17	17	76	4
FLAXMAN ROAD	404	151	77	25
MOUNT EPHRAIM ROAD	155	126	77	24
WINSLADE ROAD	35	35	77	8
HAYTER ROAD	207	149	78	28
LORN ROAD	90	86	78	15
LAMBOURN ROAD	64	50	78	9
ULLSWATER ROAD	54	41	78	9
LILFORD ROAD	464	128	78	21
VAUXHALL GROVE	130	87	78	13
BALLATER ROAD	145	139	78	20
CLAPHAM COMMON NORTHSIDE	130	79	78	15
TANKERVILLE ROAD	167	145	79	29
BURTON ROAD	74	72	79	12
NORWOOD ROAD	664	406	80	44
SALTOUN ROAD	174	149	80	30
LINGHAM STREET	56	5	80	1
ALLARDYCE STREET	5	5	80	1
CEDARS MEWS	10	10	80	1
HERNE HILL	321	130	80	21
HOPTON ROAD	254	176	80	27
THURLOW HILL	101	101	80	11
BONHAM ROAD	146	92	80	17
VICTORIA CRESCENT	128	87	80	2
SANDMERE ROAD	219	197	81	31
WOODLAND ROAD	152	124	81	20
ULVERSTONE ROAD	27	27	81	5
SHRUBBERY ROAD	88	60	82	0
MADEIRA ROAD	157	94	82	14
ROMOLA ROAD	134	134	82	24
KENWYN ROAD	120	118	82	21
LOLLARD STREET	217	17	82	3
GLENELDON ROAD	354	309	83	48
ELMCOURT ROAD	159	105	83	10
AMBLESIDE AVENUE	93	88	83	12
PALACE ROAD	576	276	83	24
MEDWIN STREET	47	47	83	4
TRENT ROAD	99	89	83	13
LAUNCELOT STREET	9	6	83	0
BONNEVILLE GARDENS	64	12	83	2
LUXOR STREET	60	60	83	5



RICHBORNE TERRACE	243	146	84	22
DERONDA ROAD	117	117	84	19
MILLBROOK ROAD	31	31	84	2
STREATHAM COMMON NORTH	272	100	84	10
OSTADE ROAD	41	39	85	6
MEDORA ROAD	86	86	85	12
BRAILSFORD ROAD	143	139	85	18
DEERBROOK ROAD	54	54	85	8
RIGGINDALE ROAD	195	169	85	23
PINFOLD ROAD	95	95	85	13
GLENELG ROAD	105	103	85	10
STREATHAM PLACE	66	7	86	1
STOCKWELL AVENUE	14	14	86	2
GAUDEN ROAD	308	219	86	23
HACKFORD ROAD	196	156	86	12
VASSALL ROAD	266	157	86	13
OFFLEY ROAD	134	124	86	10
NORWOOD HIGH STREET	121	45	87	3
MARTELL ROAD	128	114	87	15
JEFFREYS ROAD	188	62	87	8
THURLOW PARK ROAD	375	335	87	29
RUTFORD ROAD	47	39	87	1
FARNAN ROAD	56	47	87	3
JOSEPHINE AVENUE	163	150	87	18
THORNTON AVENUE	133	104	88	13
STOCKWELL ROAD	657	137	88	17
SALFORD ROAD	154	132	88	15
ST SAVIOURS ROAD	67	50	88	6
HEMBERTON ROAD	81	75	88	9
ASH LAKE ROAD	59	59	88	7
COLDHARBOUR LANE	626	314	88	27
EFFRA ROAD	234	94	88	4
RITA ROAD	124	94	88	5
MAYFLOWER ROAD	109	104	88	12
GIPSY HILL	255	236	89	18
ALBERT SQUARE	119	114	89	12
OAKDEN STREET	47	44	89	5
VILLA ROAD	53	53	89	6
BROOMGROVE ROAD	10	9	89	0
HEYFORD TERRACE	27	27	89	3
SHAMROCK STREET	27	27	89	0
TOOTING BEC GARDENS	106	102	89	9
RALEIGH GARDENS	58	56	89	6
LANDOR ROAD	321	124	90	0
WINDMILL DRIVE	50	48	90	3
VICTORIA RISE	333	164	90	16
SOUTH ISLAND PLACE	127	58	90	0
ST LUKES AVENUE	148	148	90	15
CADMUS CLOSE	10	10	90	1
TUNSTALL ROAD	75	50	90	5
PRIDEAUX ROAD	57	50	90	5
BRIXTON HILL	1,069	70	90	3
OAKDALE ROAD	136	110	90	6

TREMADOC ROAD	183	181	90	13
HEYFORD AVENUE	166	166	90	16
LOUGHBOROUGH ROAD	449	94	90	9
CAMDEN HILL ROAD	108	108	91	10
WELBY STREET	11	11	91	1
ATHERFOLD ROAD	130	122	91	9
EASTLAKE ROAD	107	104	91	0
CLAPHAM ROAD	974	352	91	27
CHESTER WAY	135	83	92	6
CEDARS ROAD	283	12	92	0
CLAPHAM COMMON SOUTHSIDE	398	135	92	10
BONNINGTON SQUARE	174	172	92	8
KELLETT ROAD	211	202	92	16
PRIMA ROAD	35	26	92	1
MORRISH ROAD	148	53	92	2
TIERNEY ROAD	332	292	92	11
MOUNT NOD ROAD	208	110	93	4
PROBYN ROAD	29	29	93	2
ALEXANDRA DRIVE	218	218	93	12
KENDOA ROAD	45	45	93	3
STREATHAM HILL	835	16	94	1
DENMARK ROAD	177	16	94	0
LAMBERT ROAD	203	193	94	8
RASTELL AVENUE	40	34	94	2
DULWICH ROAD	273	187	94	10
BLOOM GROVE	61	53	94	3
BRIXTON ROAD	700	297	95	7
TREGOTHNAN ROAD	78	60	95	3
NORTHLANDS STREET	86	85	95	2
CREWDSON ROAD	153	137	96	5
HANDFORTH ROAD	138	138	96	5
MONTRELL ROAD	157	122	97	4
PENFORD STREET	55	55	98	1
CHRISTCHURCH ROAD	404	187	99	1
CAMBERWELL ROAD	1	1	100	0
ST JULIANS ROAD	1	1	100	0
ATLANTIC ROAD	46	2	100	0
BEVERSTONE ROAD	22	2	100	0
ELM PARK AVENUE	5	2	100	0
KIMBERLEY WAY	2	2	100	0
WALDECK ROAD	2	2	100	0
WYATT ROAD	2	2	100	0
LOWER MARSH	71	3	100	0
CAVENDISH PLACE	3	3	100	0
FOUNTAIN DRIVE	3	3	100	0
HUBERT ROAD	3	3	100	0
CLAPHAM HIGH STREET	138	4	100	0
STANLEY CLOSE	6	4	100	0
MORAT STREET	178	5	100	0
STATION RISE	16	5	100	0
BARSTON ROAD	30	8	100	0
HANNEN ROAD	21	8	100	0
CLYSTON STREET	9	8	100	0

WYCHWOOD WAY	46	10	100	0
STEWARTS ROAD	11	11	100	0
MOSTYN ROAD	27	12	100	0
AYTOUN ROAD	308	13	100	0
BRIGHTON TERRACE	97	14	100	0
WIMBART ROAD	20	20	100	0
ST JOHNS CRESCENT	36	24	100	0
HURST STREET	101	29	100	0
ELLIOTT ROAD	45	29	100	0
LUNHAM ROAD	53	45	100	0
FARQUHAR ROAD	52	52	100	0
HAILSHAM AVENUE	138	138	100	0