

# Local Development Framework Issues and Options Paper

## HOUSING



London Borough of Lewisham Planning Policy July 2005

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### 1. INTRODUCTION

### 1.1. What is this paper about?

This Issues & Options Paper sets out issues and options associated with housing in the London Borough of Lewisham. It has been prepared to inform the preparation of the Spatial (core) Strategy and the Development Policies development planning documents. These documents will form part of the Local Development Framework (LDF) which will provide planning directions for the borough. In detail, this paper addresses housing issues, affordable housing issues, and development control issues specifically relating to housing.

### 1.2. THE ROLE OF THE COMMUNITY AND STAKEHOLDERS

A series of other Issues & Options Papers have been prepared covering a wide range of matters which need to be reviewed by the Council. All are the subject of extensive consultation. In preparing this and other Issues & Options Papers, the Council is looking to the community and stakeholders to tell us the following: -

- What you think of the options presented;
- What improvements could be made to the options;
- What option(s) are your preferred options that you want the Council to take forward;
- Any options we haven't considered that you would like us to consider before identifying a
  preferred option(s).

In thinking about the options presented, it must be remembered that the preferred option may not be a single discreet option presented below, but rather may be a combination of a range of options taking the best parts of each.

### 1.3. THE LOCAL DEVELOPMENT FRAMEWORK

The Local Development Framework will provide the overall planning strategy for Lewisham, made up of a number of separate but inter-related policies and plans. The <u>Spatial Strategy</u> will be a planning document contained within the Lewisham Local Development Framework. The Spatial Strategy will set out the strategic planning framework for the borough as a whole, and all other documents in the Local Development Framework must be consistent with it and advance it.

Being prepared alongside the Spatial Strategy is the <u>Development Policies & Site Allocations</u> document (hereon referred to as the Development Policies document). It will provide a framework for the detailed implementation of the strategic directions contained in the Spatial Strategy.

More information about the documents being produced as part of the LDF can be found in the Local Development Scheme which is available from the planning service on request and can be viewed on the councils planning website. The council has also produced 'a guide to the new planning system' which gives a brief summary of the new planning process for producing planning policy documents and is available on request from the planning policy team.

### 1.4. THE EVIDENCE BASE

This section outlines a selection of facts about housing which are useful to inform the discussion of the issues and options. The process of preparing a planning document to be inserted in the Local Development Framework is intended to be driven by a thorough understanding of the issues and the factors which are creating the issues. The information presented below helps to frame the context for looking at the issues and developing options.

FIGURE 1.NUMBER OF HOUSEHOLDS IN EACH HOUSEHOLD TYPE GROUP IN LEWISHAM

HOUSEHOLD TYPE	TOTAL NO. OF HOUSEHOLDS	% OF HOUSEHOLDS
Single Pensioner	12,476	11.4%
2 or more persons	6,938	6.3%
Single non-pensioner	23,684	21.6%
2 or more adults, no children	36,310	33.1%
Lone parent	12,262	11.2%
2+ adults, 1 child	9,256	8.4%
2+ adults, 2+ children	8,745	8.0%
TOTAL	109,670	100%

SOURCE - LBL Housing Needs Survey – Final Report, 2003

### FIGURE 2- HOUSEHOLD TENURE - LEWISHAM (BY WARD)

	Owner Occupied - No Mortgage	Owner Occupied - With Mortgage	Owner Occupied - Shared Ownership*	Rented from Local Authority	Rented from RSL**	Private Rented
Bellingham	14.3%	29.7%	1.9%	39.8%	6.5%	7.9%
Blackheath	17.3%	30.1%	0.8%	23.6%	7.7%	20.4%
Brockley	10.8%	24.6%	1.9%	26.1%	16.7%	19.9%
Catford South	24.6%	49.7%	0.8%	9.3%	3.8%	11.7%
Crofton Park	18.3%	42.4%	2.9%	10.4%	7.8%	18.2%
Downham	15.9%	33.4%	1.7%	41.2%	2.4%	5.5%
Evelyn	4.6%	12.9%	2.1%	58.9%	11.3%	10.1%
Forest Hill	17.9%	34.0%	1.1%	22.9%	8.6%	15.6%
Grove Park	21.7%	39.7%	2.2%	19.1%	6.9%	10.4%
Ladywell	16.4%	38.3%	1.8%	13.6%	12.2%	17.7%
Lee Green	21.4%	40.5%	1.4%	17.1%	6.5%	13.0%
Lewisham Central	13.0%	32.4%	1.3%	22.0%	10.9%	20.4%
New Cross	4.9%	22.2%	2.2%	42.8%	10.1%	17.8%
Perry Vale	17.2%	37.7%	1.5%	21.5%	8.8%	13.3%
Rushey Green	15.2%	36.3%	1.0%	14.1%	13.4%	20.1%
Sydenham	15.3%	32.6%	0.9%	25.8%	13.0%	12.4%
Telegraph Hill	9.8%	27.6%	1.9%	34.2%	10.0%	16.4%
Whitefoot	20.6%	36.6%	1.3%	30.9%	4.3%	6.4%
Lewisham (L.A)	15.4%	33.1%	1.6%	26.6%	9.0%	14.3%

SOURCE - Census 2001, ONS

NOTES - \* Pays part rent and part mortgage
\*\* Includes Housing Co-operative and Charitable Trust.

FIGURE 3 –

AVERAGE PRICE OF RESIDENTIAL PROPERTY SALES COMPLETED –

ALL DWELLINGS – LEWISHAM & GREATER LONDON

	LEWISHAM	GREATER LONDON
DETACHED		
Oct-Dec 2003	375,652	520,023
Jul – September 2004	410,000	569,564
Oct-Dec 2004	398,177	569,338
SEMI-DETACHED		
Oct-Dec 2003	257,882	278,070
Jul – September 2004	300,678	324,059
Oct-Dec 2004	296,144	322,487
TERRACED		
Oct-Dec 2003	211,597	271,187
Jul – September 2004	231,578	298,258
Oct-Dec 2004	222,693	278,094
FLAT / MAISONETTE		
Oct-Dec 2003	152,977	222,148
Jul – September 2004	162,193	241,739
Oct-Dec 2004	161,459	239,316
AVERAGE PRICE		
Oct-Dec 2003	186,884	260,659
Jul – September 2004	204,735	284,633
Oct-Dec 2004	202,988	276,698

SOURCE - Land Registry – Residential Property Price Report –

October - December 2004

### FIGURE 4 - MINIMUM & AVERAGE PROPERTY PRICES IN LEWISHAM

	Nov 1998		June 2002		% increases in prices	
Property Size	Minimum	Average	Minimum	Average	Minimum	Average
	Price	Price	Price	Price		
I bedroom	£42,500	£51,500	£100,500	£119,000	136%	131%
2 bedroom	£55,000	£62,500	£126,000	£148,500	129%	138%
3 bedroom	£75,500	£89,000	£163,500	£196,500	117%	121%
4 bedroom	£102,500	£124,500	£209,000	£249,500	104%	100%
Overall Average					122%	123%

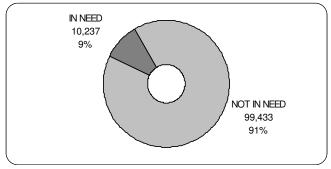
SOURCE - LBL Housing Needs Survey – Final Report, 2003

### FIGURE 5 - MINIMUM & AVERAGE PRIVATE RENTAL PRICES IN LEWISHAM

Property Size	Nov 1998		June 2002		% increases in prices	
	Minimum	Average	Minimum	Average	Minimum	Average
	Rent	Rent	Rent	Rent		
I bedroom	£429	£485	£558	£621	30%	28%
2 bedroom	£542	£607	£679	£750	25%	24%
3 bedroom	£680	£828	£842	£942	24%	14%
4 bedroom	£862	£1,036	£1,008	£1,192	17%	15%
Overall Average					24%	20%

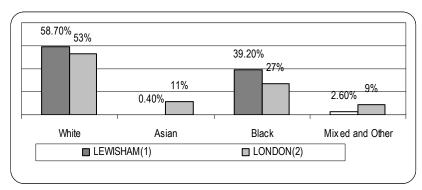
SOURCE - LBL Housing Needs Survey – Final Report, 2003

### FIGURE 6 - LEWISHAM HOUSHOLDS IN HOUSING NEED



SOURCE - LBL Housing Needs Survey – Final Report, 2003

### FIGURE 7 – ETHNICITY OF HOUSEHOLDS IN HOUSING NEED



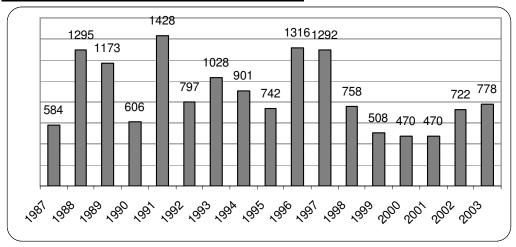
SOURCE - 1. LBL Housing Needs Survey – Final Report, 2003 2. Greater London Housing Requirements Study, GLA / Opinion Research Services - 2003

### FIGURE 8 - LEWISHAM NET HOUSING APPROVALS

NET – HOUSING APPROVALS –				
SUBTOTALS -	LEWISHAM			
PERIOD	NET APPROVALS			
1987 – 1991	7941			
1992-1996	4940			
1997-2001	2397			
1992-2001	7337			
1987-2001	15278			

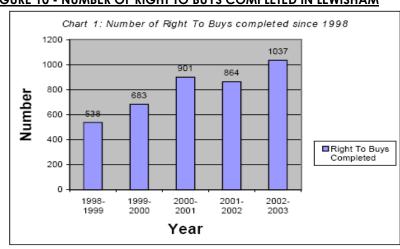
NOTE- Approvals for 2000, 2001 & 2003 are estimates only. SOURCE - GLA Housing Provision Survey 2002 & 2003 (www.london.gov.uk).

### FIGURE 9 - LEWISHAM NET HOUSING COMPLETIONS



NOTE- Approvals for 2000 & 2003 are estimates only. SOURCE - GLA Housing Provision Survey 2002 & 2003 (www.london.gov.uk).

FIGURE 10 - NUMBER OF RIGHT TO BUYS COMPLETED IN LEWISHAM



Source - Lewisham Homelessness Review and Homeless Strategy 03-06

FIGURE 11 - NET SHORTFALL OF ALL HOUSING NEED (PER ANNUM FOR FIVE YEARS TO 2007).

	Housing need					
Size	Backlog need	Newly arising	Total need	Supply	Shortfall/	
requirement		need			(surplus)	
1 bedroom	335	1,251	1,586	624	962	
2 bedrooms	317	1,514	1,831	654	1,177	
3 bedrooms	221	337	558	195	363	
4+ bedrooms	128	181	309	21	288	
TOTAL	1,001	3,283	4,284	1,494	2,790	

SOURCE - LBL Housing Needs Survey – Final Report, 2003

### PART 1: HOUSING ISSUES & OPTIONS

The provision of housing for the community is one of the most important planning functions of the Council. The Sustainability Appraisal Scoping Report identified a range of issues associated with the provision of housing. These were drawn from a review of other plans and programmes (e.g. National Planning Policy, The London Plan), a review of the Unitary Development Plan, and the feedback from consultation on the Scoping Report which was undertaken in May 2005. The Sustainability Appraisal Scoping Report can be viewed on the Council's planning website.

The issues which have been identified for housing in Lewisham are: -

- Meeting Lewisham's target for new housing (from the London Plan);
- The mix of new housing in terms of dwelling size;
- The need to bring empty homes back into use;
- The need for special forms of accommodation to meet local need;
- Gypsy and Traveller sites.

In addition to the above general housing issues, a range of affordable housing issues and development control issues for housing were also identified. These are dealt with separately in Part 2 and Part 3 of this paper.

### 2. ISSUE 0: PROVISION OF NEW HOMES AND HOUSING TARGET ISSUES & OPTIONS

### 2.1. WHAT IS THE ISSUE?

The planning system is the key tool by which all levels of government seek to increase the level of new homes. The provision of new homes is vital to meeting housing need of the community.

A clear statutory framework exists for the amount of new homes to be provided in Lewisham, with national planning policy setting a strategic aim to increase provision and the London Plan setting out a detailed program (in terms of number of new dwellings) for new housing in the borough.

The number of new homes to be provided in Lewisham is driven by the possible sources of supply (primarily available land) available. The London Housing Capacity Study, from which current housing targets are derived, is currently being reviewed. This is prepared by the Greater London Authority with some involvement by the boroughs. At this stage the existing targets are the basis of the discussion below but once the London Housing Capacity Study is completed the new targets will need to be accommodated in the Local Development Framework.

With this target, the Council will need to identify enough sites to meet the target and provide sufficient housing for the community. The preferred location for new housing across the borough is an issue that will be discussed in the Spatial Strategy.

### 2.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 2.2.1 National Planning Policy

The provision of new housing provided in the right place and at the right time is a key objective of the Government for the planning system. Planning Policy Guidance 3 outlines that local authorities should plan to meet the housing requirements of the whole community and that sufficient land for housing should be identified. Proposed revisions to PPG3 suggest that local authorities review employment land to ascertain if it can be better used for housing.

### 2.2.2 The London Plan

The London Plan seeks to increase the supply of housing in London overall, and sets an additional homes target for each London borough. The target for Lewisham is 17,350 additional homes, from all sources, over the period 1997 - 2016, with this equating to an annual target of 870 additional homes (Policy 3A.1, 3A.2). The Local Development Framework will need to be in general conformity with this target.

### 2.2.3 Unitary Development Plan

The Unitary Development Plan, whilst being in general conformity with the London Plan as it is required to be, does not exactly reflect the London Plan target. It concentrates on new build and conversions, so does not include all the sources of new provision included in the London Plan. The UDP figure is 11,178. The additional sources which bring the figure up to that in the London Plan are from long term vacant property brought back into use and from non self contained property such as student accommodation.

### 2.3. DISCUSSION

Once a target is established, the Council will need to find and identify sites to meet this target. Although a percentage of new homes always comes from unidentified sites that are called 'windfall sites'. The Site Allocations Issues and Options Paper will discuss in more detail sites that are required to be used for housing. This paper deals with the overall target only.

Given the statutory basis for planning in Lewisham, the very least the council can do is to reflect the London Plan's targets. For the purpose of the Sustainability Appraisal an addition option of do nothing will be assessed so as to provide a comparison with the option above.

OPTION	NAME	DESCRIPTION
Option 0.1	SET TARGET FOR NEW HOUSING AS DERIVED FROM THE LONDON HOUSING CAPACITY STUDY	This option involves establishing a target consistent with the London Housing Capacity Study (currently 870 new homes per year but subject to revision).  This option is consistent with the London Plan and National Planning Policy.
Option 0.2	SET TARGET THAT EXCEEDS LONDON PLAN OR THAT DERIVED FROM LONDON HOUSING CAPACITY STUDY	This option would establish a target in excess of the figure give by strategic guidance. It would therefore represent a growth housing strategy for Lewisham.

### 3. ISSUE 1: HOUSING MIX & TYPE ISSUES & OPTIONS

### 3.1. WHAT IS THE ISSUE?

Housing mix refers to the size (usually in number of bedrooms) of new housing or converted housing in both market housing and affordable housing. Planning policies have sought to influence the size of housing so that the needs of the community can be met in terms of matching house sizes to household sizes and needs.

Housing mix policies have also sought to achieve mixed and balanced communities in that housing within any area should cater for a range of households (e.g. from single persons households through to family households).

### 3.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 3.2.1 Planning Policy Guidance 3 – Housing (PPG3)

PPG3 seeks to ensure that plans are formulated which secure an appropriate mix of dwelling sizes and type in new developments and conversions based on local needs. The Government is currently consulting on a revision to PPG3 titled Planning for Mixed Communities. In this, the Government outlines that in planning for affordable housing, the Local Development Framework should continue to set policies relating to size and type of dwellings.

However, in relation to market housing, the Local Development Framework should set out the broad balance for future house size and mix requirements, including broad locations where the balance may be different. All sites should then contribute to the creation of mixed and balanced communities and achieving the broad balance, but each site will not be expected to replicate the mix precisely. The only exception to this is on large sites (above 60 dwellings or 2 hectares in size) where the revisions state that the broad balance should 'particularly' be taken into account.

### 3.2.2 The London Plan

The London Plan at Policy 3A.4 – Housing Choice seeks to ensure that new developments (including affordable housing developments) offer a range of housing choice in terms of housing sizes and types based on local needs.

### 3.2.3 Unitary Development Plan (UDP)

The UDP currently contains a policy (HSG14) which seeks to have a mix of housing sizes and types for affordable housing. It specifically mentions family housing and homes for smaller households. Policy HSG 6 – Dwelling Mix - applies more generally to all housing, and seeks a mixture of dwelling sizes in the case of residential development over 15 or more units. It specifically refers to the mismatch between households with more than 3 people and the number of dwellings able to accommodate those households.

### 3.2.4 Lewisham Community Strategy

The Lewisham Community Strategy seeks in part to secure the regeneration of the borough and its housing and in doing so, create mixed and balanced communities.

### 3.3. DISCUSSION

In planning for mixed and balanced communities, the size of housing provided is an important consideration given that mixed communities should not only have a mix of income levels or socio-economic characteristics but should also have a mix of households ranging from single person households through to family households. The Lewisham Housing Commission pointed out that a mix of housing will also allow residents to change their housing type whilst remaining in the local area throughout their life cycle.

The need to plan for a mix in affordable housing has strong support from both National Planning Policy and the London Plan. However, changes, proposed by the Government, are seeking to make a distinction between affordable and market housing, with a preference for the latter to be determined by the market.

In terms of affordable housing, the Lewisham Housing Needs Survey suggests that for the five years up until 2007, most need is coming from one and two bedroom houses. This is broadly reflected in market housing, except the Unitary Development Plan does outline a shortage in the borough of house sizes of more than 3 bedrooms when compared against household sizes of more than four persons.

OPTION	NAME	DESCRIPTION
Option 1.1	SET A PREFERRED HOUSING MIX FOR AFFORDABLE HOUSING	This option would involve establishing a preferred housing mix for affordable housing which responds to the housing needs of the borough. It would be applied to each proposal that comes forward for approval with an expectation that the preferred mix is generally accommodated as part of the proposal.  This option is derived from, and consistent with, the following:  Planning Policy Guidance Note 3 – Housing;  The London Plan – Policy 3A.4;  Unitary Development Plan – HSG6.
Option 1.2	SET HOUSING MIX FOR MARKET HOUSING	This option would involve establishing a preferred housing mix for market housing which responds to the housing needs of the borough. It would be applied to each proposal that comes forward for approval with an expectation that the preferred mix is generally accommodated as part of the proposal.  This option is derived from, and consistent with, the following: -  Planning Policy Guidance Note 3 – Housing; The London Plan – Policy 3A.4; Unitary Development Plan – HSG6.  This option would however be inconsistent with the changes to PPG3 – Housing currently being consulted on by the Government.
Option 1.3	SET BROAD MIX FOR ALL HOUSING	This option would involve establishing a broad balance for housing mix to be provided across Lewisham, but there would not be a requirement that each specific site provides that mix except on large sites (those above 60 dwellings or 2 hectares in size).  This option would be consistent with the changes to PPG3 – Housing currently being consulted on by the Government.
Option 1.4	NO HOUSING MIX POLICY	This option is included so that a comparison can be made with the other options. It involves establishing no mix preference to be achieved either across the borough or in any specific type of development

### 4. ISSUE 2: SPECIAL NEEDS ACCOMMODATION ISSUES AND OPTIONS

### 4.1. WHAT IS THE ISSUE?

The provision of special needs housing for those in housing need who require such housing is a key requirement of the planning system. Special needs housing is housing designed specifically to meet the housing needs of the community that cannot best be met through traditional self-contained housing that dominated the housing stock. Special needs housing includes accommodation for students, the aged, disabled people, and children leaving care.

### 4.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 4.2.1 Planning Policy Guidance 3 - Housing (PPG3)

Planning Policy Guidance Note 3 and Planning Policy Statement 3 - Housing (draft) both seek to ensure that the full range of housing need it met.

### 4.2.2 London Plan

Policy 3A.10 of the London Plan seeks to ensure that special needs housing, including sheltered housing with care support staffed hostels and residential care homes, is provided in order to meet the housing needs of the community.

### 4.2.3 Unitary Development Plan (UDP)

Policy HSG18 seeks to provide for a full range of special needs housing. It outlines that proposals falling to classes C2 and C3 of the Use Class Order will be considered on their merits where there is a proven local need. This policy includes student accommodation as a form of special needs housing. The policy also includes the need to avoid the concentration of special needs housing in a particular area as being a relevant consideration.

### 4.3. DISCUSSION

The provision of special needs housing is vital in order to meet the needs of the whole community.

OPTION	NAME	DESCRIPTION
Option 2.1	TO ENCOURAGE THE PROVISION OF SPECIAL NEEDS HOUSING	This option would encourage special needs housing across the borough.
Option 2.2	TO ENCOURAGE THE PROVISION OF SPECIAL NEEDS HOUSING BUT ENSURE THAT SURROUNDING LAND USES ARE CONSIDERED SO THAT A CONCENTRATION OF SUCH HOUSING IS NOT CREATED.	This option is the same as the above option except it would require consideration of the need to avoid a concentration of special needs housing in any one location having regard to surrounding development.

### 5. ISSUE 3: GYPSY AND TRAVELLER SITES ISSUES AND OPTIONS

#### 5.1. WHAT IS THE ISSUE?

The Government defines Gypsies and Travellers as 'a person or persons who have a traditional cultural preference for living in caravans and who either pursue a nomadic habit of life or have pursued such a habit but have ceased travelling, whether permanently or temporarily, because of the education needs of their dependant children, or ill-health, old age, or caring responsibilities (whether of themselves, their dependants living with them, or the widows and widowers of such dependants), but does not include members of an organised group of travelling show people or circus people, travelling together as such'.

The Council currently operates a site in Thurston Road near Lewisham Town Centre. This site will be considered as part of the Lewisham Town Centre Area Action Plan. Government guidance is that the housing needs of Gypsies, is an issue that should be considered when formulating planning policy as part of the Local Development Framework.

The 2002 Lewisham Housing Needs Survey did not specifically review the housing needs of Gypsies and Travellers'. However, the Council understand that the existing site operating currently is meeting the level of demand for sites in Lewisham. As part of consultation on the Spatial Strategy relevant groups representing Gypsies and Travellers will be consulted with to confirm this understanding.

### 5.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 5.2.1 National Planning Policy

PPS3 seeks to ensure the housing needs of all in the community are met. In addition to this, the Government has a circular (1/94) specifically relating to this issue. The Government is currently consulting on a revision to Circular 1/94 which addresses Gypsy Sites and Planning. The draft revised circular would require that where there is a need that sites be identified to meet that need. It also outlines that regardless of whether there is a need, criteria based policies for assessing future applications for Gypsy and Travellers' sites is required. Consideration of the impact of mixed uses as part of a site is also required. The draft revised circular also reinforces the need for local housing needs assessments to consider the needs of Gypsies and Travellers.

The draft revised circular continues to outline that the following considerations should be made: -

- The promotion of peaceful and integrated co-existence between the site and local community;
- Highways considerations;
- Noise and other disturbance from the movement of vehicles to and from the site;
- The stationing of vehicles on the site:
- On-site business activities.

### 5.2.2 The London Plan

The London Plan seeks to ensure that the needs of all in the community are met.

### 5.2.3 Unitary Development Plan (UDP)

The UDP currently contains Policy HSG20 Travellers Sites which identifies the criteria against which applications for sites will be assessed. This includes the site size and suitability, access to local services, highway considerations and the need for travellers sites.

### 5.3. OPTIONS FOR ADDRESSING THE ISSUE

OPTION	NAME	DESCRIPTION
Option 3.1	SET OUT CRITERIA FOR ASSESSING NEW GYPSIE SITES.	Given the emerging directions from National Planning Policy in relation to Gypsy and Travellers' sites, as well as the existing approach in the UDP, it is considered that the only option to pursue in the Spatial Strategy is to provide a criteria based policy as part of the Development Control & Site Allocations document which seeks to provide a framework for consideration of new sites. The criteria should be drawn from the emerging national guidance.  Questions – Do you agree? Do you have another preferred option?

### 6. ISSUE 4: EMPTY HOMES ISSUES AND OPTIONS

### 6.1. WHAT IS THE ISSUE AND OPTIONS?

London as a whole has a large number of vacant housing properties, and strategies at the national, regional and local level seek to bring these properties back into use. Such properties can form a small but important part of providing housing for the community and for meeting the boroughs housing target.

However, the planning system is not well placed to greatly assist in bring empty properties back into use. This is owing to the reality that planning is mainly effectively when someone seeks planning approval. If a land owner with a vacant property does not choose to bring that property back into use, there is little that the planning system can do to encourage or compel that landowner to do so. Notwithstanding this, actions outside of the planning system, principally through encouragement and promotion, although compulsory purchase powers can be used, can have some impact on bringing empty properties back into use. The Council undertakes such activities.

Matters which the planning system can have an impact on relate to facilitating an empty property being brought back into use through a policy framework for extensions, up-grades and redevelopments where this is required to successfully bring the property back into use. These matters are addressed elsewhere in this and other discussion papers as they apply to housing in general.

OPTION	NAME	DESCRIPTION
Option 4.1	ENCOURAGE THOSE WHITH EMPTY PROPERTIES TO BRING THEM BACK INTO RESIDENTIAL USE.	It is proposed that the Spatial Strategy should encourage the bringing back into use of empty property as the only option to address this issue.  Questions – Do you agree? Do you have another preferred option?

### PART 2: AFFORDABLE HOUSING ISSUES & OPTIONS

### 7. AFFORDABLE HOUSING ISSUES AND OPTIONS

Affordable housing delivered through the planning system involves market housing (housing provided by private individuals and companies) making a contribution to affordable housing as part of housing developments. In practice and in line with Government guidance, this contribution is made in the form of actual affordable housing constructed on site. The affordable housing contribution is often (but not always) partially subsidised by the Housing Corporation which is responsible for allocating public affordable housing grants. The key source of funding for the contribution however is mostly derived from the market housing provided cross-subsidising the affordable housing. A private developer would normally work with a Registered Social Landlord to deliver the affordable housing.

The mechanisms of affordable housing delivered through the planning system are quite complex, with many different stakeholders playing a role. These include the Housing Corporation, Registered Social Landlords, the Council (as both a direct provider of affordable housing and as the local planning authority), housing developers (big and small), and the end consumers of affordable housing.

The initial work undertaken by the Council in developing the Spatial Strategy and the Development Policies document raised a number of issues which these documents must address in relation to affordable housing. These are: -

- Meeting affordable housing need;
- The amount of affordable housing to be provided in Lewisham as part of a development proposal;
- The tenure mix of affordable housing;
- The role affordable housing plays in the creation of mixed and balanced communities.
- Affordable housing prejudicing other planning objectives; and
- Prevent the loss of affordable housing without its planned replacement at existing or higher densities;

In addition to the above, and in line with the principles of the Local Development Framework, the Council is also intending to prepare a Supplementary Planning Document on Section 106 Agreements. This will include detailed requirements for the implementation of affordable housing policies contained in the Spatial Strategy and in Area Action Plans. This Supplementary Planning Document will deal with the following issues which have been identified: -

- The definition of affordable housing in the local context, including the relationship between income levels and house prices and rents;
- The definition of a key worker;
- The detailed mechanisms to ensure that affordable housing is efficiently and effectively delivered through the planning system, including matters such as the long term ownership and management arrangements for affordable housing.

It is important that in discussing affordable housing some key terms are understood. The following outlines what it meant by these common terms associated with affordable housing.

AFFORDABLE HOUSING	Housing designed to meet the needs of household's whose incomes are not sufficient to allow them to access decent and appropriate housing in Lewisham where the price is set in the open market. It comprises social rented housing and intermediate housing.
SOCIAL	Housing provided by a landlord where access is on the basis of housing need and
RENTED	rents are no higher than target rents set by the government for housing associations
HOUSING	and local authority rents.
INTERMEDIATE	Housing at prices or rents above target rents (for social rented housing) but
HOUSING	substantially below market prices or rents. Intermediate housing can include sub-
	market renting, low-cost home ownership, shared ownership and key worker

	housing.
KEY WORKER HOUSING	Housing provided below market prices to key workers who cannot afford market housing but who do not qualify for social rented housing. Whilst no precise definition exists for who a key worker is, in general it is anyone who provide key services to the public.
MARKET HOUSING	Private housing for rent or for sale, where the price is set in the open market.

### 8. ISSUES 5&6: AFFORDABLE HOUSING THRESHOLDS AND CONTRIBUTIONS ISSUES AND OPTIONS

### 8.1. WHAT IS THE ISSUE?

Affordable housing thresholds are the levels of housing development on any site above which planning policy will require a contribution to affordable housing. Affordable housing contributions are the amount of affordable housing to be provided on site (in total) where a site is developed for market housing.

The issues addressed, for which options are outlined below, include: -

- The thresholds which determine when an affordable housing contribution will be sought;
- The level of affordable housing in development proposals.

### 8.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 8.2.1 Planning Policy Guidance 3 - Housing

PPG3 requires that the type and amount of affordable housing be identified by the Council, and that this should be based on the housing needs of the borough. PPG3 also reinforces that in assessing individual proposals each individual sites suitability for affordable housing and the mix of affordable housing is a key consideration to be determined at the time development is proposed.

PPG3 also reinforces that where an affordable contribution is required there is a presumption that such housing will be provided on-site.

The Government is currently consulting on a revision to PPG3 titled Planning for Mixed Communities. The relevant parts of this revision are expected to replace Planning Circular 06/98 – Affordable Housing. It outlines that affordable housing should only be sought in developments above 15 dwellings or sites of more than 0.5 hectares but that a low threshold may be set where the levels of need are high. Authorities should take into account the economics of provision, the impact on the delivery of new housing, and the objective of creating sustainable communities.

### 8.2.2 Planning Circular 06/98 - Affordable Housing

This planning circular reinforces the requirements of PPG3. It requires that the Local Development Framework include policies for seeking an element of affordable housing on suitable sites, and that this should include both low-cost market housing (intermediate) and subsidised housing (social rented).

Planning Circular 06/98 also outlines that in London, affordable housing should be sought on housing development of 15 or more dwellings, or any site which is 0.5 of a hectare or more irrespective of the number of dwellings.

### 8.2.3 The London Plan

The London Plan outlines a strategic target for affordable housing of 50% of all new housing from all sources. Within this 50% the London Plan encourages the provision of 70% social rented housing and

30% intermediate housing. In setting local affordable housing targets, the London Plan requires that the Council take account of the target and the promotion of mixed and balanced communities.

### 8.2.4 Unitary Development Plan (UDP)

The Unitary Development Plan requires that an affordable housing contribution will be sought in the case of any site 0.5 hectares or more or capable of accommodating 15 dwellings or more. This includes mixed use developments, live-work developments and conversions.

The policy takes as a starting point for negotiations that a contribution of 35% of affordable housing is required. This is broken up as 25% social rented housing, 5% intermediate, and 5% keyworker (the keyworker can be social rented or intermediate tenure). The 35% affordable housing requirement is derived from a study titled 'Affordable Housing in London' which was a report prepared for the Greater London Authority to support the London Plan as it was developed. It is also worth noting that the 35% is for affordable housing contributions from market developments. It does not include affordable housing delivered outside of the planning system (e.g. directly by a Registered Social Landlord).

### 8.3. DISCUSSION

The threshold for affordable housing is generally subjective, with the existing Unitary Development Plan adopting the position of Planning Circular 6/98 of 15 dwellings or more or a site greater in size than 0.5 hectares. Affordable Housing in London, Spatial Development Strategy Technical Report 1 (July 2001), reviewed all thresholds across London and this demonstrated that there was considerable range between the London boroughs. Some points from this assessment is that a number of local authorities had a threshold of 10 dwellings or more, one authority required a contribution from all residential sites, with many others have thresholds of between 15 and 25 dwellings.

A consideration which must be given significant weight alongside affordable housing is the need for new housing overall. The Government and the London Plan both seek to ensure the planning system delivers the maximum number of new housing possible. Obviously any requirement placed on private housing development (such as affordable housing) can have the effect of reducing the supply of housing overall by virtue of making housing development less attractive for investment.

It is necessary and important that planning policies provide guidance on how much affordable housing should be provided on any given site that meets the threshold for the provision of affordable housing. However, in a general sense the amount of affordable housing required as part of an individual development should be taken as a guide only owing to the variables associated with the viability of any given proposal. This is reflected in both the London Plan (Policy 3A.8) and the Unitary Development Plan (Policy HSG14).

Notwithstanding this, establishing an amount of affordable housing to be provided as a starting point for negotiations is necessary and important to ensure all parties are aware of this starting point for negotiations, to promote consistency to the fullest extent possible, and to ensure purchasers of land are generally aware of what their obligations are.

The Lewisham Housing Needs Survey (2002) concluded that to meet housing need, all new housing would need to be affordable. This demonstrates in general how much need exists for affordable housing in Lewisham. The extent of need (whilst noting that the planning system will never be able to meet all the need) indicates that the planning system should attempt to deliver the maximum reasonable amount of affordable housing whilst having regard to other relevant policy considerations (e.g. regeneration) and the economic viability of any particular housing proposal. This is in line with Policy 3A.8 of the London Plan.

### 8.4. OPTIONS FOR ADDRESSING THE ISSUE – AFFORDABLE HOUSING THRESHOLD

OPTION	NAME	DESCRIPTION
Option 5.1	TO SEEK A CONTRIBUTION TO AFFORDABLE HOUSING ON SITES CAPABLE OF PROVIDING MORE THAN 15 DWELLINGS OR SITES OF MORE THAN 0.5 HECTARES.	In this option, housing development would be required to make a contribution to affordable housing where these thresholds are met. It would also apply to conversions.  This option is consistent with the existing Unitary Development Plan and PPG3 – Housing.
Option 5.2	TO SEEK A CONTRIBUTION TO AFFORDABLE HOUSING ON SITES CAPABLE OF PROVIDING MORE THAN 10 DWELLINGS.	In this option, housing development would be required to make a contribution where these thresholds are met. It would also apply to conversions.  This option would be consistent with the revision to PPG3 proposed by the government where a significant need for affordable housing exists (as in the case of Lewisham).
Option 5.3	TO SEEK A CONTRIBUTION TO AFFORDABLE HOUSING ON ALL RESIDENTIAL SITES.	In this option, all housing development would be required to make a contribution to affordable housing. This option has been identified on the basis of the significant need for affordable housing in Lewisham and to test whether a contribution on all sites is a viable outcome.

### 8.5. OPTIONS FOR ADDRESSING THE ISSUE – AMOUNT OF AFFORDABLE HOUSING

OPTION	NAME	DESCRIPTION
Option 6.1	TO SEEK, AS A STARTING POINT FOR NEGOTIATIONS, A CONTRIBUTION OF 20% OF AFFORDABLE HOUSING.	In this option, where an affordable housing contribution is required the starting point for negotiations between the developer and the Council would be 20% of all housing to be affordable. This option has been included for comparison purposes with the other options.
Option 6.2	TO SEEK, AS A STARTING POINT FOR NEGOTIATIONS, A CONTRIBUTION OF 35% OF AFFORDABLE HOUSING.	In this options, where an affordable housing contribution is required the starting point for negotiations between the developer and the Council would be 35% of all housing to be affordable. This option is supported by research undertaken by the Greater London Authority.
Option 6.3	TO SEEK, AS A STARTING POINT FOR NEGOTIATIONS, A CONTRIBUTION OF 50% OF AFFORDABLE HOUSING.	In this option, where an affordable housing contribution is required the starting point for negotiations between the development and the Council would be 50% of all housing to be affordable. This option is closely aligned to the position in the London Plan.
Option 6.4	TO SEEK, AS A STARTING POINT FOR NEGOTIATIONS, 50% OF AFFORDABLE HOUSING AS PART OF LARGE HOUSING DEVELOPMENTS.	In this option, large housing developments would have a separate amount of affordable housing to other sites. This recognises that on a larger site, it may be possible to achieve greater economies of scale and more coordinated arrangements for public subsidy. This option would be consistent with the London Plan.

## 9. ISSUE 7: AFFORDABLE HOUSING, MIXED & BALANCED COMMUNITIES & TENURE ISSUES AND OPTIONS

### 9.1. WHAT IS THE ISSUE?

The issues identified which are addressed here include: -

- The tenure mix of affordable housing; and
- The need to create mixed and balanced communities.

The tenure of affordable housing refers to what type of affordable housing (e.g. social rented and/or intermediate) should be provided on a site. The provision of affordable housing has a significant impact on the creation of mixed and balanced communities in terms of the tenure of housing. In Lewisham, the tenure mix of various parts of the borough show in some locations that social rented housing dominates the local housing market. In others, owner occupied and the private rental market are more dominant.

For example, social rented housing makes up 35.6% of all housing in the borough. However, ward variations see some locations above 40% (e.g. Bellingham – 46.3%, Downham – 43.6%, New Cross – 52.9%, Telegraph Hill – 44.2%), with Evelyn ward containing 70.2% of social rented housing.

In applying affordable housing policies, the Council has the opportunity to assist in the creation of more mixed and balanced communities at a local level.

It should be noted that in a general sense, any affordable housing policy as it relates to tenure which is set out in the Local Development Framework would be taken as a guide only, with the detailed considerations of affordable housing being made on each individual development proposal considering matters such as site costs, the availability of public subsidy, and the need to encourage rather than restrain residential development. This is reflected in both the London Plan (Policy 3A.8) and the Unitary Development Plan (Policy HSG14).

The point of establishing a clear policy basis for flexible affordable housing provision in areas of high social rented housing is to clearly indicate to the community the Council's expectations for affordable housing in these areas and to send the appropriate messages to the development industry. This last point is important given the Councils priorities for regeneration.

### 9.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 9.2.1 Planning Policy Guidance 3 - Housing

The Governments planning policy relating to housing makes it clear that creating mixed and balanced communities should be a key aim of local planning authorities. Further, it seeks to ensure that new housing development helps to secure a better social mix by avoiding the creation of large areas of housing of similar characteristics. The Government also requires that local planning authorities identify suitable areas for affordable housing. The over-arching objective of Government housing policy is to increase the delivery of new housing.

The Government is currently consulting on a revision to PPG3 titled Planning for Mixed Communities. This proposes that planning policies should identify circumstances where the amount of affordable housing to be sought will be different from the norm.

### 9.2.2 Planning Circular 06/98 - Affordable Housing

This Government circular provides specific advice on implementing affordable housing policy. In particular relevance to this issue is its advice that the suitability of affordable housing on any given site can be determined based on whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority. In this instance, the creation of mixed and balanced communities should be seen as a relevant planning objective.

### 9.2.3 The London Plan

The London Plan seeks generally to increase the overall supply of housing. In relation to affordable housing, it seeks to ensure that 70% of affordable housing is social rented and 30% of affordable housing is intermediate provision. The London Plan also reinforces the need to promote mixed and balanced communities. In the context of individual development proposals, the London Plan advises that in negotiating affordable housing the need to encourage residential development is a priority.

### 9.2.4 Unitary Development Plan (UDP)

Policy HSG15 of the UDP addressed mixed and balanced communities, and advises that in areas of more than 43% social rented housing the affordable housing provision required will be sought in a way which assists in securing a more balanced social mix within that locality. It advises that this may take the form of more flexible tenures or other arrangements as appropriate.

### 9.2.5 Housing in Lewisham -

The Final Report of the Lewisham Housing Commission 2000

The Lewisham Housing Commission was an independent forum established by the Council to explore options for the future of housing. In relation to this issue, the report recommends that the Council should actively seek to create more mixed and balanced communities and that a more diversified residential market in Lewisham would be of benefit and avoid the negative effects of concentrations of residual social housing. It further recommends that the Council should not be obliged to require additional social housing in locations where there is already overprovision.

### 9.2.6 Lewisham Community Strategy

The Lewisham Community Strategy seeks in part to secure the regeneration of the borough and its housing and in doing so, create mixed and balanced communities whilst increasing the supply of affordable housing. It also seeks to develop new opportunities to intermediate housing markets.

### 9.3. DISCUSSION

As noted, the exact tenure mix of affordable housing has a role to play in the creation of mixed and balanced communities, and this is reflected in planning policies at the National, regional and borough level. However, the exact tenure mix is difficult to determine on a borough wide basis. Rather, policy should establish a basis from which negotiations can take place, having regard to the full range of site development matters and the Local Development Framework as a whole.

OPTION	NAME	DESCRIPTION
Option 7.1	TO SEEK AN AFFORDABLE HOUSING CONTRIBUTION OF 70% SOCIAL RENTED AND 30% INTERMEDIATE ACROSS THE WHOLE BOROUGH.	In this option, affordable housing on sites meeting the threshold would be provided in a mix of 70% social rented and 30% intermediate. The arrangements for delivering this affordable housing would be set out in the Section 106 Supplementary Planning Document, including matters such as target prices and rents and the type of intermediate housing.  This option is broadly consistent with the London Plan.
Option 7.2	TO SEEK ONLY INTERMEDIATE AFFORDABLE HOUSING IN AREAS	In this option, wards which currently contain a tenure mix which includes over 40% of social rented housing would have their affordable housing contributions from market development directed towards intermediate forms of tenure.

OPTION	NAME	DESCRIPTION
	WITH AN EXISTING HIGH CONCENTRATION OF SOCIAL RENTED HOUSING.	This option is broadly consistent with the existing Unitary Development Plan which makes it clear (HSG15) that in areas of high social rented housing more flexible tenure would be provided (e.g. intermediate provision).
Option 7.3	TO FACILITATE THE PROVISION OF SOCIAL RENTED HOUSING 'OFF-SITE' IN AREAS OF HIGH SOCIAL RENTED HOUSING AS PART OF THE AFFORDABLE HOUSING POLICY.	In this option, wards which currently contain a tenure mix which includes over 40% of social rented housing would have any social rented housing contribution provided off-site.  This option is inconsistent with PPG3 which strongly promote affordable housing provision on site. This is also reflected in the Unitary Development Plan.
Option 7.4	TO SEEK ONLY SOCIAL RENTED HOUSING IN AREAS WHICH DO NOT HAVE A HIGH CONCENTRATION OF THIS TENURE TYPE.	In this option, wards which currently contain a tenure mix which includes less than 40% social rented housing would have any affordable housing contribution focussed towards social rented housing.
Option 7.5	TO NOT SPECIFY A MIX, AND MAKE THOSE DETERMINATIONS ON A CASE-BY-CASE BASIS.	In this option, a tenure mix would not be outlined in planning policy, with each affordable housing contribution being assessed on the basis of the entire planning policy framework contained in the Local Development Framework.
Option 7.6	TO SEEK, AS PART OF THE INTERMEDIATE CONTRIBUTION, AN ELEMENT OF KEY WORKER HOUSING.	In this option, an element of key worker housing would be provided as part of a contribution to intermediate housing. The exact amount of key worker housing would be determined in the Section 106 Supplementary Planning Document.  This option is consistent with the Unitary Development Plan which currently sets a specific target for key worker housing. It would also be in line with the London Plan which encourages intermediate provision to be broken down into other priority groups.

### PART 3: HOUSING – DEVELOPMENT CONTROL ISSUES & OPTIONS

### 10. HOUSING - DEVELOPMENT CONTROL ISSUES & OPTIONS

Development control policies are the policies which will identify the specific matters which a development proposal must address and they will be used to determine whether a proposal is appropriate to a particular site. They will be mostly of a general nature applying to all development, with policies on specific matters only being developed where further detail is required. Where necessary, additional elaboration of development control policies will be in the form of Supplementary Planning Documents.

In relation to housing, the Lewisham Local Development Scheme (the project plan for the Local Development Framework) identifies that a Supplementary Planning Document on residential development standards will be prepared. This document will contain much of the specific details relating to residential development.

The Development Control and Site Allocations document will identify the matters which need to be addressed as part of a housing proposal in a general manner only. As such, those reviewing the options below need to consider the extra detail to be contained in the Residential Development Standards Supplementary Planning Document. Where there are clear linkages between the two documents these are identified in the discussion below.

Development control issues for housing were identified in the Sustainability Appraisal Scoping Report and from the feedback from consultation on the Scoping Report undertaken in May 2005. The issues identified were:-

- Lifetime homes standards:
- Wheelchair accessible housing;
- Residential conversions;
- Residential densities;
- Standards for conversions, extensions, backlands development and new build.

### 11. ISSUE 8: LIFETIME HOMES / WHEELCHAIR ACCESSIBLE HOMES ISSUES & OPTIONS

### 11.1. WHAT IS THE ISSUE?

The London Plan defines lifetime homes as 'ordinary homes designed to provide accessible and convenient homes for a large segment of the population from young children to frail older people. Lifetime homes have 16 design features that ensure that the home will be flexible enough to meet the existing and changing needs of most households, as set out in the Joseph Rowntree Foundation report 'Meeting Part M and Designing Lifetime Homes'.

Part M of the Building Regulations deals with accessibility for housing. Lifetime homes standard adds to the regulation with requirements which seek additional built in flexibility so that housing can better meet the needs of the community.

### 11.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 11.2.1 National Planning Policy

Planning Policy Guidance Note 3 and Planning Policy Statement 3 (Housing) (draft) requires that local planning authorities should aim to provide a greater choice in housing types. And to provide housing which meets the needs of all in the community.

### 11.2.2 The London Plan

Policy 3A.4 of the London Plan relates to housing choice, and it encourages boroughs to ensure that all new housing is provided to lifetime home standards and that 10% of new housing is designed to be wheelchair accessible or easily adapted for those using a wheelchair.

### 11.2.3 Unitary Development Plan (UDP)

HSG4 (Layout and Design of New Residential Development) requires that new residential development should provide physical accessibility for all members of the community including people with disabilities. The reasoned justification for this policy outlines that the Council will encourage the provision of units that are designed to lifetime standards.

HSG14 (Special Needs Housing) outlines that the Council will seek to provide a full and complimentary range of supported accommodation and to provide accommodation in a location and type that is well designed to meet the needs of particular groups.

### 11.3. DISCUSSION

The key issue with lifetime homes and wheel chair accessible homes is that there are extra costs associated with constructed homes to the higher standard. Whilst it is expected that this cost would be less than the cost of adapting home later to make them more accessible, the cost is transferred from an occupier requiring adaptation (and the public if the work is subsidised) to the developer which would then inevitably passed on to the buyer in the form of a higher house price.

The other concern is that if only a small proportion of new housing meets these standards, there is no way of requiring that those houses be used by those requiring the additional features. This may result in the additional cost of adapting existing homes anyway with the homes containing the additional features not being fully utilised for the purpose those additional features were originally installed for.

OPTION	NAME	DESCRIPTION
Option 8.1	TO REQUIRE ALL HOUSING TO MEET LIFETME HOME STANDARDS	This option would require that all new housing meets lifetime homes standards.
Option 8.2	TO REQUIRE ALL HOUSING IN MAJOR DEVELOPMENTS TO MEET LIFETIME HOMES STANDARD	This option would require that only in major developments (more than 15 dwellings) would lifetime homes have to be provided.
Option 8.3	TO REQUIRE 10% OF ALL NEW HOUSING TO BE WHEELCHAIR ACCESSIBLE OR EASILY ADAPTED FOR THOSE USING A WHEELCHAIR	This requires that 10% of all new housing be wheelchair accessible or easily adapted for those using a wheelchair.
Option 8.4	TO REQUIRE 10% OF ALL NEW HOUSING IN MAJOR DEVELOPMENT TO BE WHEELCHAIR ACCESSIBLE.	This option would require that in major developments (15 dwellings or more) 10% of all new housing would have to be wheelchair accessible or easily adapted for those using a wheelchair.

### 12. ISSUE 9: REPLACEMENT OF HOUSING LOST ISSUES AND OPTIONS

### 12.1. WHAT IS THE ISSUE?

The issue relates to circumstances where housing is lost (e.g. through demolition or redevelopment) and what level of replacement of housing is to be provided.

### 12.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

Policy 3A.12 & Policy 3A.13 of the London Plan seeks to ensure that the loss of housing and special needs accommodation should be re-provided at existing or higher densities.

### 12.3. OPTIONS

OPTION	NAME	DESCRIPTION
Option 9.1	POLICY TO ENSURE THAT ANY LOSS OF HOUSING AND SPECIAL NEEDS ACCOMMODATION IS REPLACED AT THE SAME DENSITY.	This option would ensure that there is no net loss of housing as part of any redevelopment scheme. It would be consistent with the London plan
Option 9.2	POLICY TO ENSURE THAT ANY LOSS OF HOUSING AND SPECIAL NEEDS ACCOMMODATION IS REPLACED AT HIGHER DENSITIES.	This option would ensure that there is a net increase in residential development as part of any redevelopment scheme.
Option 9.3	NO POLICY REQUIRING THE REPLACEMENT OF HOUSING AND SPECIAL NEEDS ACCOMMODATION LOST.	This option would mean that there could be a net loss of residential accommodation.

### 13. ISSUE 10: CONVERSIONS ISSUES & OPTIONS

### 13.1. WHAT IS THE ISSUE?

Conversions refers to the reuse of existing buildings for additional housing from what currently exists. In practise, it typically involves a larger family dwellings being converted into a number of smaller dwellings. Conversions have been a valuable source of supply of new home in Lewisham for some time, and it is expected that there will be a continued demand for conversion to occur. The key planning issue here however is whether conversions are appropriate, particularly given the loss of larger family dwellings which occurs as a result.

### 13.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

### 13.2.1 National Planning Policy and the London Plan

Planning Policy Guidance 3 seeks to meet housing need and to increase the supply of new housing. In relation to conversions, these can be conflicting objectives as conversions will result in additional homes but can result in the loss of larger family dwellings which are required to meet housing need in the community. Both also seek to achieve more mixed and balanced communities.

### 13.2.2 Unitary Development Plan

The current Unitary Development Plan outlines that conversions will be permitted where it results in the increase in the number of dwellings. It does require that where possible, at least one family dwelling should be provided in every conversion. It also outlines a range of circumstances where conversions will not be acceptable, including those houses which have a net floorspace of less

than 130sq.m as originally constructed where the dwelling is still suitable for family accommodation, those which are currently in multiple occupation and can continue to provide a satisfactory standard of accommodation, and where a sufficient area of garden cannot be retained in the conversion.

### 13.3. OPTIONS FOR ADDRESSING THE ISSUE

OPTION	NAME	DESCRIPTION
OPTION 10.1	ALLOW CONVERSIONS	This option would allow conversions where minimum amenity and other standards are met. It would not require a family dwelling to be provided, and the existing use of the property for a family dwelling (if relevant) would not be a consideration.
OPTION 10.2	ALLOW CONVERSIONS ONLY FOR HOUSES THAT HAVE A NET FLOOR SPACE OF 130SQ.M OR MORE AS ORIGINALLY CONSTRUCTED	This option would only allow for the conversions of existing housing where minimum amenity and other standards are met where the existing house is larger than 130sq.m. This would seek to ensure that existing family dwellings are retained in the borough.
OPTION 10.3	ALLOW CONVERSIONS BUT REQUIRE AT LEAST ONE FAMILY DWELLING TO BE PROVIDED	This option would require that in conversions, wherever possible, a family dwelling should be provided.
OPTION 10.4	DO NOT ALLOW CONVERSIONS	This option would not support conversions but would protect the stock of larger family dwellings.

### 13.4. DISCUSSION

All of the above options are conditional on meeting minimum amenity and other standards (e.g. parking) which will be outlined in the Development Policies and Site Allocations Document and the Residential Development Standards Supplementary Planning Document. This is particularly the case in conservation areas.

The above range of options are primarily drawn from the existing UDP policy. In general, conversions are a source of new housing in the borough and to meet the Council's housing target all sources of supply need to be identified and brought forward. However, the need to create mixed and balanced communities which in this case means the retention and provision of family accommodation is a relevant consideration in development of a policy for conversions.

### 14. STANDARDS FOR RESIDENTIAL DEVELOPMENT ISSUES & OPTIONS

This issue relates to the need to identify matters which are relevant considerations to be made when assessing planning applications for residential development. In planning for residential development, whether it be new housing, conversions, backlands development or residential extensions, it is important that the considerations the Council has to make are identified. This ensures that those proposing residential development respond to these matters in preparing their applications.

The following options have been developed having regard to the review of other plans and programmes undertaken as part of the Scoping Report as well as existing practise in Lewisham.

The options for all residential development proposals are: -

- Preservation of buildings of architectural or historic interest;
- Residential development to respect the character of the surrounding area;
- Consider parking and traffic movements;
- Consider pedestrian flows;
- Consider access to the new/modified houses created;
- Require open space / amenity space;
- Require landscaping;
- Require the retention and planting of trees;
- Consider privacy (internal to a development and between a development and its surrounds);
- Consider natural lighting;
- Consider the outlook.

The details of what will be required will be detailed and explained as part of the Residential Development Standards Supplementary Planning Document. For the purposes of the Development Policies & Site Allocations document it is necessary to identify them only. Further, other development control policies such as design will apply to all development, including housing. They are addressed in other Issues and Options Papers.

### 15. CONCLUSION

This paper sets out a series of issues and options relating to housing in Lewisham. Stemming from those issues broad options have been proposed which the Council now wishes to consult on. These broad options will lead us towards the preferred options which will form the new policy direction for the Core Strategy and Development Policies & Site Allocations Development Documents (CS/DP&SA Plans).

The Council is seeking your comments and/or views on the issues and options set out in this discussion paper in order to ensure that all feasible options are considered as part of the appraisal process and in developing the CS/DP&SA Plans.

The Council welcomes any general comments, but would particularly value your views on the options presented.