

## Public Examination of the Development Management Local Plan

### London Borough of Lewisham response to the Inspector's initial query regarding DM3: Conversion of single dwelling to two or more dwellings

*If I understand this policy correctly, it addresses only the loss of family 'houses' through conversion to flats. However, the policy's use of the two terms 'dwelling' and 'house' has caused some confusion. Would it be better to make an OM using 'house', or 'single family house' throughout rather than proceeding with the Council's suggested potential changes SM29 and 30?*

(Note a complete list of all the Inspector's initial questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myserVICES/planning/policy/LDF/development-policies/Documents/DMLPInitialQueries.pdf>)

Planning Policy – 13 January 2014

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#### Council Response

- 1.1 The Council accepts that the current wording in DM Policy 3 could cause some confusion and suggests that DM Policy 3 be reworded to improve its clarity. These changes would replace the Council's suggested changes SM29 and 30 (Submission version 2013).
- 1.2 In order to reduce confusion in the terminology used by this policy the Council suggests the following amendments to the Introductory and Policy text of DM Policy 3 in accordance with the Inspector's question. Some minor editorial corrections have also been noted. Text additions are **underlined in bold** and deletions are ~~struckthrough~~.

Introductory text:

2.5 Conversion of a single residential ~~residential~~ **family house** dwelling to two or more dwellings.

Para 2.42 The aim of this policy is to appropriately manage the future subdivision of **single** family dwellings **houses** and ~~commercial space~~ into self-contained flats, in order to ensure that new dwellings provide a high standards of amenity, and to promote and retain housing choice in the borough.

Para 2.43 Family housing (single **family houses** dwellings with three or more bedrooms) is seen as a valuable resource which should be retained in order to meet identified housing need and provide housing choice...

## DM Policy 3

### Conversion of a single ~~dwelling~~ family house to two or more dwellings

1. The Council will refuse planning permission for the conversion of a single ~~dwelling~~ family house into flats except where environmental conditions mean that the single family house is not suitable for family accommodation due to any factor listed below:
  - a. Adjacent to noise generating or other environmentally unfriendly uses
  - b. Lack of external amenity space suitable for family use.
2. Any single family house considered suitable for conversion according to point 1 of this policy will need to have a net internal floorspace greater than 130 sq. m.
3. All conversions must meet the general design requirements and housing standards in DM Policy 25 (Landscaping and trees), DM Policy 29 (Car parking), DM Policy 30 (Urban design and local character), DM Policy 31 (Alterations and extensions to existing buildings including residential extensions) and DM Policy 32 (Housing design, layout and space standards).

## 2. Associated changes

- 2.1 Associated changes would need to be made through several paragraphs of the Justification to the policy, as follows:

Para 2.44 last sentence: 'Policy DM3 is intended to provide that choice be ensuring that conversion of single ~~dwellings~~ family houses into flats does not further reduce the provision of this type of housing.'

Para 2.46: 'The conversion of single ~~dwelling~~ family houses into flats will be permitted under the strict circumstances described in the policy. Single ~~dwelling~~ family houses in situations unfavourable to family occupation might include properties adjacent to busy roads, houses that lack sufficient external amenity space or other physical conditions that would be individually assessed.'

Para. 2.49 first sentence: 'The Lewisham Housing Conversions Study 2012 has been prepared to provide evidence for this policy and uses data provided by the Valuation Office (VOA) to identify the potential for the conversion of single ~~dwelling~~ family houses in the borough.'

Para 2.50 second, third and fourth sentences: 'Telegraph Hill Ward showed one LSOA that had the potential for the conversion of 100% **of** the remaining stock of unconverted **single family** houses into flats in an area where converted flats already predominate. Evelyn Ward which is predominantly flatted development has the potential to lose 20% (10 dwellings) of the remaining unconverted ~~housing~~ stock **of single family houses** which would reduce housing choice in the area. Most wards present a more mixed picture but several have the potential for the conversion of large numbers of **single** family ~~sized dwellings-~~ **houses** which would reduce housing choice in the borough.'

Para 2.51 last sentence: 'The recent history of completions provides a further justification for the retention of **single** family **houses** ~~sized dwellings-~~ by this policy.'

Para 2.52 second sentence: 'The Council has ensured through the Strategic Site Allocations in the Core Strategy and the smaller other allocations in the Site Allocations Local Plan and Lewisham Town Centre Local Plan that the projected housing growth for Lewisham can be accommodated without the need for the further conversion of **single** family ~~dwellings~~ houses into flats and the consequent loss of high quality family accommodation.'

Para. 2.53 first sentence 'The Lewisham **Housing** Conversions Study estimates that the policy option **would** ensure the retention of up to 7,300 unconverted **single** family dwellings .....

Para 2.54 last sentence: 'The Council considers that the policy is appropriate and is the most consistent and effective way to prevent the conversion of ~~dwellings~~ **single family houses** suitable for family accommodation that will meet identified housing need.'

### **3. Additional Glossary definition**

3.1 An additional glossary definition is suggested for the term 'single family house'.

**Single Family House: Self-contained house occupied by a single family**