ST/P5449
06 June 2014

Planning Policy,
London Borough of Lewisham,
3rd Floor, Laurence House,
1 Catford Road, Catford,
London,
SE6 4RU

Dear Sirs

**Development Management Local Plan
Post Examination Modifications**

On behalf of Pocket please find enclosed representations on the recent Post Examination Modifications.

Pocket is a private sector developer which provides intermediate housing for sale to singles and couples whose household income is too high to qualify for social housing, but not enough to buy on the open market.

Pocket's homes are sold at an initial discount to the local market of at least 20% and their future affordability is governed through a Section 106 legal agreement and a lease which stipulates that the homes can only be on-sold to people on a household income in line with those affordability thresholds set out in the London Plan or those identified locally at the time of sale. Therefore Pocket homes make a real addition to the affordable housing stock; and ensure that housing remains affordable in perpetuity.

Whilst Pocket did not make representations to the EIP they wish to make a number of representations to the proposed post examination modifications.

**Policy DM7 - Affordable Rented Housing: (Paragraph 2 and paras 2.27 and 2.79)**

Whilst the policy is principally concerned with Affordable Rented Housing and Pocket is a provider of Intermediate housing, it is considered the wording of the policy addresses the wider provision of affordable housing across the borough and therefore it is relevant to comment on the wording. Pocket principally support this policy however we consider the wording should also include a caveat that where a scheme is providing principally a single tenure but is maximising affordable housing there should not be a requirement for a mix of affordable tenures to be provided on site.

Pocket's schemes ideally provide 100% of the units as intermediate affordable housing. These schemes provide significantly above the normal affordable housing requirements as set out in the Local Plan. Whilst the policy identifies a viability assessment as being a mechanism to consider the

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overall tenure mix, it is considered that this is unnecessary where a scheme is maximising the affordable housing provision.

Therefore we propose the following sentence be added at the end of Para 2.78. "*Schemes which maximise affordable housing provision significantly above the 50% target set out in Policy 1 of the Core Strategy but which are of single tenure will be strongly supported*"

**Policy DM.7 Mixed Use Employment Locations (Paras 1, 2 and 4)**

Pocket is currently considering a development within one of the Mixed Use Employment Locations (MEL). Whilst we recognize that the Council's revised wording reflects the core strategy we consider there may be situations where schemes can come forward within MEL's independent of other elements but which do not prejudice the overall objectives of development within the MEL.

The Council has inserted the words "delivered as part of the comprehensive redevelopment of these sites promoted by the Core Strategy" and we consider the wording should be revised to state "*delivered to ensure a comprehensive approach to the redevelopment of these sites promoted by the Core Strategy*".

**DM.32 Para 4: Housing Design, Layout and Space Standards – Internal Standards**

The change to the wording has deleted reference to "studio flats (one person dwellings at 37sqm) not being supported other than in exceptional circumstances" to referring to "single person dwellings not being supported other than in exceptional circumstances". The Council has also deleted reference to major and district town centres.

We note that Council's reasoning for this change in its response to the Inspector; however we consider the Council has misquoted the London Plan and is actually referring to two linked but separate issues.

Firstly 37sqm 1bed/one person units are wholly in accordance with the London Plan (Policy 3.5). There is no test within Policy 3.5 (or the Housing SPG 2012) that such units should be permitted in exceptional circumstances. Table 3.3 as set out in Policy 3.5 clearly indicates 37sqm 1 person units as meeting the policy. On this basis Pocket units accord with Paragraph 4 (a) of Policy DM32.

Pocket has delivered a significant number of units at 37-38sqm and these have been recognized by the GLA and a number of Councils as meeting London Plan standards. Pocket has £21m loan funding from the GLA for the delivery of hundreds of new affordable homes across London (including within Lewisham) and would not have been able to meet the terms of its agreement with the GLA had its units not been in accordance with the London Plan.

It is clear from the wording of the Policy and the explanatory text within the Council's response to the Inspector that the Council is misquoting Paragraph 3.36. This actually states that *"single bed space dwellings of less than 37 square metres may be permitted if the development proposal is demonstrated to be of exemplary design and contribute to achievement of other objectives and policies of this Plan"* (our underlining). It is also clear from the explanatory wording that the Council is seeking to reflect the wording of the London Plan.

We append a letter from Andrew Barry Pursell (Senior Manager of the London Plan) dated 28 May 2012 confirming that Pocket's units meet the 37sqm and also confirming the exceptional circumstances where smaller units may be acceptable.

On this basis we consider the wording of Policy DM32 4 (e) be amended to reflect the London Plan and state *"Single bed space dwellings of less than 37 square metres may be permitted if the development proposal is demonstrated to be of exemplary design and contribute to achievement of other objectives and policies of this Plan"*.

We trust these representations can be forwarded to the Inspector to further test the soundness of the policies.

Yours faithfully

**Sean Tickle**
**Rolfe Judd Planning Limited**

cc       Melanie Edge          -          Pocket