

7 HOUSING

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What you've told us

New housing development must be carefully managed to ensure:

- There are enough **services** and **community facilities** to cope with extra demands
- There is no harm to **local character** and the **environment**
- Suitable controls over **houses in multiple occupation (HMOs)**

More and better quality housing must be provided for specific groups, including:

- **Homeless** people and other **vulnerable groups**
- **Students**
- **Families** with children

Housing costs are a concern because:

- They are **too high**
- There are not enough **affordable homes**
- Developers say **financial viability** is important when deciding the amount of **affordable homes** to build

What we've learned

Good track record of delivery:

The Council has regularly met its housing targets over the past decade.

Housing costs are rising quickly:

In Lewisham, average house prices are more than 10 times the average workplace earnings.

In 2018 the median household income in Lewisham was £29,000, the 3rd lowest in London.

Social rented homes are the only housing that remains genuinely affordable for the majority of people in Lewisham.

Private rented sector is growing:

1 in 4 residents in Lewisham live in the private rented sector – double that of 15 years ago.

Private rents rose by more than 50% between 2011 and 2017.

Housing mix and quality:

Most new private housing built is with 1 and 2 bedrooms.

In September 2019, almost 5,100 families on the housing register were living in an overcrowded home and in need of a larger one.

There has not been a large rise in HMOs, but the location of HMOs has shifted to the south of the Borough, with large concentrations in Bellingham, Downham and Whitefoot.

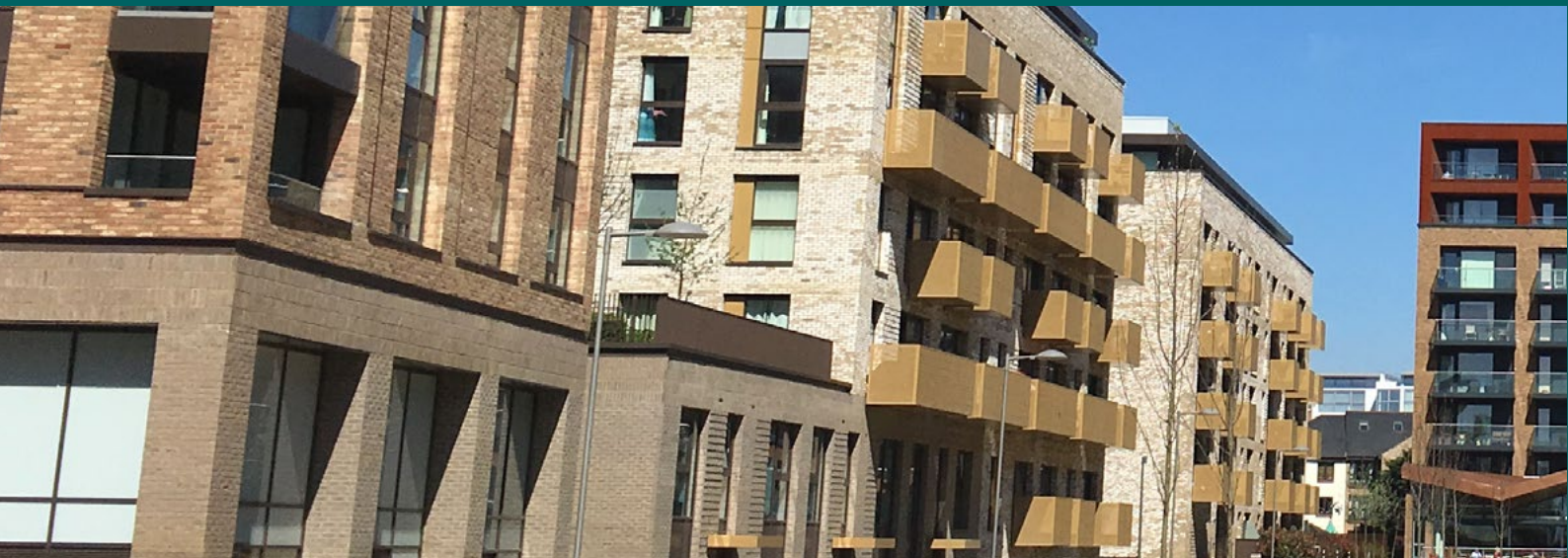
Most social housing units meet the Decent Homes standard. Our research shows private sector housing is not achieving the same level of standards.

Viability:

Our research shows that small housing schemes (less than 10 units) could make a contribution to affordable housing.



Main issues



Cannon Wharf, North Deptford

Affordability

The gap between earnings and housing costs is quickly widening.

Different housing needs

Lewisham's diverse population has many different housing needs that must be catered for.

Overcrowding

There are a large number of families on the housing register in need of a larger home.

Design quality

The standard of accommodation varies across Lewisham. Measures are needed to ensure everyone has access to a decent and secure home.

A growing population

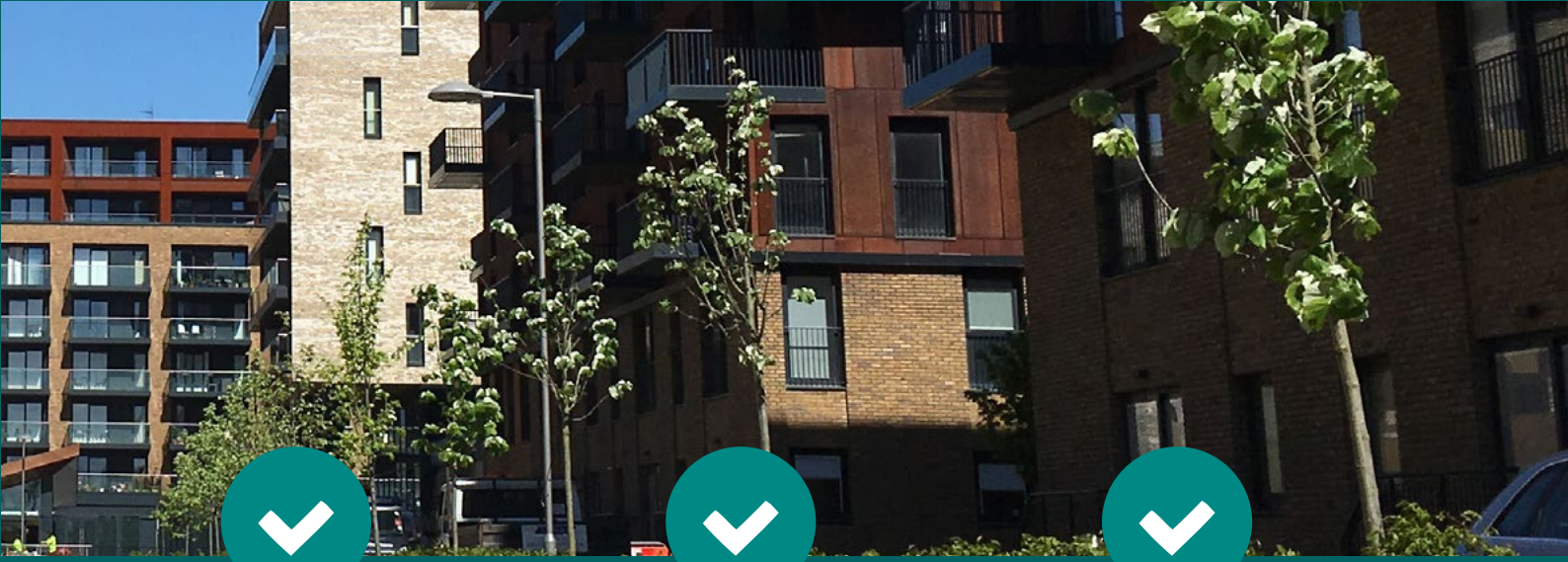
Many more homes are needed for our growing population. The draft London Plan sets a new housing target for Lewisham of 1,667 net units a year, and the Government's target is much higher. Growth on this scale will have to be properly managed.

HMOs

HMOs are part of the housing mix that helps to meet local need. This type of development must be carefully managed to ensure housing units are fit for purpose, and to protect the amenity of neighbourhoods.



We're proposing to...



Secure more genuinely affordable homes

- Set a target of 50% of all new homes built to be genuinely affordable (based on local income levels). In Lewisham, this is social rent or 'London affordable rent'.
- Maximise affordable housing on new schemes, including small developments (less than 10 units).

Boost housing delivery

- Meet and exceed the London Plan housing target – by delivering most new homes on large sites we have identified, and elsewhere through the sensitive intensification of neighbourhoods.
- Protect against the loss of housing, including social housing.
- Use powers available to bring vacant homes back into use.

Tailor housing to local communities

- This includes older people, students and those who require specialist support.
- Protect family homes and seek that family units are built in new housing schemes.
- Improve controls over HMOs.
- Ensure that affordable housing is built to a high quality standard with equal access to amenities, such as play space, regardless of tenure.

We've also considered

- Using the standard definition of affordable housing (which does not account for local income levels).
- Whether affordable housing contributions from small schemes impacts on their financial viability.
- Allowing conversions of family homes into flats, with no requirement to retain a family-sized unit.



HO1 Meeting Lewisham's housing needs

Lewisham's strategic housing target

- A The Council will work positively and proactively with key stakeholders and development industry partners to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs. Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure:
 - a. The draft London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and
 - b. That delivery against Lewisham's Local Housing Need figure is maximised.
- B The Council will keep under review the Local Plan strategic housing target. Where changes to London Plan policies are made, including the strategic borough-level housing targets, the local plan review process will be used to ensure Lewisham's local policies remain in general conformity with the London Plan.

Increasing housing supply

- C A carefully managed uplift in the delivery of new housing development across the Borough, with priority given to genuinely affordable housing, will be achieved by:
 - a. Directing new residential development to Opportunity Areas, strategic corridors, town centres and other well-connected and sustainable locations, consistent with the spatial strategy for the Borough, in line with Policy OL1 (Delivering an Open Lewisham);
 - b. Allocating strategic sites for new housing

- development, including mixed-use development, and supporting proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these;
- c. Facilitating the sensitive intensification of residential areas, and supporting the development of small sites for housing, in line with Policy HO2 (Optimising the use of small sites);
- d. Undertaking a programme of housing estate maintenance, renewal and regeneration that ensures high quality housing provision, results in no net loss of affordable housing and delivers an uplift in affordable housing wherever possible;
- e. Ensuring that all development proposals make the best use of land and optimise the capacity of housing sites, in line with Policy QD6 (Optimising site capacity)
- f. Making the best use of the existing housing stock, including by using available tools to bring vacant units back into use and to regulate the use of homes for short-stay visitor accommodation; and
- g. Strongly resisting development that would result in the net loss of housing unless:
 - i. It is suitably replaced at existing or higher densities with at least the equivalent level of new residential floorspace; or
 - ii. The proposal is for strategic infrastructure that demonstrably meets an identified need and is necessary to support delivery of the spatial strategy for the Borough.
- h. Ensuring the Borough's housing target aligns with the expected phasing and rate of delivery of new homes.

<p>Inclusive and mixed neighbourhoods and communities</p> <p>D All proposals for housing development must contribute to and support inclusive and mixed neighbourhoods and communities across Lewisham. Development will be required to deliver an appropriate mix of housing within the site and locality having regard to individual site circumstances (including location, character, and nature and scale of development proposed) along with:</p> <ul style="list-style-type: none"> a. The strategic target for 50% of all new homes delivered in the Borough to be for genuinely affordable housing; b. The required mix of tenure types for affordable housing, in line with Policy HO 3 (Genuinely affordable housing); c. The need for provision of a mix of unit sizes to meet local need, including the target unit size mix for affordable housing set out in the Council's Housing Strategy, or other strategies and evidence base documents, as appropriate; d. The need for provision of family housing units (3+ bedrooms), with an element of such provision expected to be delivered on schemes of 10 or more dwellings; and e. The delivery of sustainable neighbourhoods that are appropriately supported by community and other strategic infrastructure. <p>E Development proposals will be resisted where they comprise solely of studios and/or 1 bedroom, 1 person units, or result in an overconcentration of 1 or 2 bedroom units on a site or locality, unless it can be demonstrated that the provision:</p> <ul style="list-style-type: none"> a. Is located in an area that benefits from high levels of public transport accessibility; and b. Forms part of a larger development that 	<ul style="list-style-type: none"> c. includes appropriate provision for a wider mix of unit sizes, including family size units; or d. Is sited in a locality that benefits from good provision of larger and family size units, and would therefore provide for a better balance in the mix of unit sizes in the area; or e. Is the only housing format deliverable owing to site size or other development constraints, and where a studio unit is proposed, it is of an exceptional design quality. <p>Housing choice</p> <p>F To help ensure that local residents and other people have access to a wide range of suitable housing provision, the Council will:</p> <ul style="list-style-type: none"> a. Seek that development delivers a wide range of genuinely affordable and other housing products, including market housing, to meet the needs of households of different sizes and income levels; b. Support proposals that are targeted to meeting the needs of specific groups including: families with children, older people, people with disabilities, students and vulnerable people; c. Promote and support innovative housing designs, such as modular housing, particularly where these address acute or specialist local housing needs; d. Support appropriate proposals for self-build or custom build housing, and seek to identify land to help facilitate such development where a need is clearly established; and e. Encourage developers and agents to market new housing units for sale or rent to existing local residents and workers before advertising them more widely to others.

Explanation

Lewisham's strategic housing target

- 7.1 The London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the Capital. The London-wide Strategic Housing Market Assessment (SHMA), which informed the preparation of the draft London Plan, identifies a need for some 66,000 additional homes per year to be delivered across London. To accommodate this need for housing the London Mayor advocates for fundamentally new approaches to housing delivery. The London Plan policies seek to achieve a significant uplift in housing across the region. They are set in the context of the limited availability of developable land in a highly urbanised, world city and the competing pressures for different land uses. The policies also respond to the need for major investment in strategic infrastructure, particularly public transport, to support housing growth on this scale and to unlock the full development potential of areas and sites.
- 7.2 In order to address the identified housing needs for the region, the draft London Plan sets out 10-year housing targets. It then directs local authorities to include the relevant borough-level targets within their local plans. These targets have been informed by the London-wide Strategic Housing Land Availability Assessment (SHLAA), which considered the potential development capacity of large sites (0.25 hectares or more) across the region. Boroughs are also required to set a positive planning framework to meet and wherever possible exceed the London Plan housing targets. For Lewisham, the 10-year strategic housing target is 16,670 net housing completions (or 1,667 net completions per year).
- 7.3 The NPPF (2019) and its associated Planning Practice Guidance establish a standard method for determining the minimum number of homes needed in an area. Planning authorities are required to use this standard method for calculating 'Local Housing Need' in preparing their Local Plans, unless it can be demonstrated there are exceptional circumstances to justify the use of another method.²⁷ The draft London Plan was not required to use this standard approach in setting its revised housing targets. This is owing to the Government's transitional arrangements for implementing the new NPPF, which provided that the draft London Plan would be assessed against the previous version of the NPPF (2012). However, Lewisham's new Local Plan will be assessed against the current NPPF at its independent examination.
- 7.4 It is imperative that we prepare Lewisham's new Local Plan having regard to the draft London Plan, including the borough-level housing targets, in order to ensure it aligns with the spatial development strategy for the region. At the same time, we must ensure that national planning policy requirements are satisfied. Through the Lewisham Strategic Housing Market Assessment (2019), we have calculated the Local Housing Need (LHN) figure for the Borough, in line with the NPPF. The SHMA indicates that the current position for the borough is a minimum

²⁷ NPPF (2019), paragraph 60

housing need figure of 1,939 net units per year based on the 2016 London Plan target. The LHN figure is 2,334 net units based on the draft London Plan (Intend to Publish version) annual housing target of 1,667 units. These LHN figures are significantly higher than Lewisham's strategic housing target set out in both the current and draft London Plan.

- 7.5 The Local Housing Need figure is not in itself a housing target. Rather, it is a starting point for considering the level of housing need that should be addressed through the plan-making process. Lewisham's new Local Plan is being progressed in the interim period where a future review of the London Plan, taking into account the latest NPPF, is pending. There is, as of yet, no clear indication of how or whether the standard method for LHN will be taken forward by the London Mayor in the regional planning context. We are therefore taking a pragmatic approach at this time, by calculating the LHN figure and assessing whether it can be realistically achieved within Lewisham over the new plan period. To help inform this assessment we have undertaken a number of exercises including:
- A comprehensive review of land and sites available for development in the Borough, including by participating in the London-wide SHLAA;
 - Undertaking of several 'call for sites' exercises inviting the public, including landowners, developers and agents, to help identify sites that might be suitable for different types of development;
 - A Metropolitan Open Land Review to understand how the Borough's MOL is performing and whether there is scope to release any parts of this land to other uses, including for housing;

- Scrutiny of potential development sites to establish whether they are deliverable and developable²⁸, including through engagement with land owners, in the early stages of plan preparation;
- Detailed assessments of the development capacity of potential development sites, taking into account the uplift in density and overall site capacity that could be achieved through the delivery of planned strategic transport infrastructure, particularly the Bakerloo line upgrade and extension to Hayes.

- 7.6 Through the above exercises, we have identified specific large sites which have the potential capacity to deliver approximately 25,000 net new homes. When combined with trend-based windfall delivery rates in the Borough, there is sufficient capacity to meet and exceed the draft London Plan housing target over a 15-year period; however the phasing of development will be an important consideration. Meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham's unique circumstances, particularly the need for strategic transport infrastructure to unlock development potential in areas, and to optimise the capacity of sites.

- 7.7 For the purpose of monitoring housing completions, we will consider net changes on conventional and non-conventional forms of housing in line with the London Plan. For the avoidance of doubt, non-self contained accommodation for students will be counted on a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Non-self-

²⁸ Deliverable and developable as defined by NPPF, paragraph 67.

contained accommodation for older people (C2 use class) will be counted on a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation will count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

7.8 Through this Regulation 18 consultation on Lewisham's Local Plan, we are consulting with the public to better understand whether there are any additional sites that could feasibly be delivered within the plan period, and whether the strategic sites (site allocations) included in Part 3 of the Local Plan are deliverable and developable, particularly according to the indicative capacities and timeframes set out.

7.9 In addition, through the Duty to Cooperate we are taking the opportunity to continue engaging with neighbouring and other planning authorities to understand whether they are, or will be, in a position to assist in accommodating any residual local housing need arising in Lewisham that may need to be addressed outside of the Borough.

7.10 Informed by outcomes of this Regulation 18 consultation, we will confirm an evidence-based housing target for Lewisham. We will also consider the options available for managing delivery towards the target over the plan period. This may include the need for the use of a 'stepped housing trajectory' to ensure that Lewisham's housing target reflects our latest knowledge on the expected phasing of larger development sites (including sites with

planning consent), the rate of housing delivery experienced locally, and the delivery of strategic transport infrastructure.

7.11 The Council will keep under review the adopted Local Plan strategic housing target, having particular regard to the London Plan. Where any future amendments are made to the London Plan, including to the borough-level housing targets, then the Council will consider the necessity for a local plan review in order to ensure its local policies remain in general conformity with regional planning policies, and the spatial development strategy for London.

Increasing housing supply

7.12 The Local Plan seeks to facilitate a carefully managed uplift in the delivery of new housing development across the Borough to meet local needs, with priority given to genuinely affordable housing. There are a number of different routes to increasing housing supply which reflect the varying scale of opportunities available. These range from enforcement action



Heathside and Leathbridge (BPTW)

to bring vacant housing units back into use, the sensitive intensification of small sites, and more strategically, the comprehensive redevelopment of larger brownfield sites via site allocations. All such routes relate to the spatial strategy for the Borough, which aims to direct development in support of Good Growth. We will work with development industry partners and other stakeholders to identify opportunities to optimise the capacity of sites that are suitable for new housing, ensuring that development will be appropriately supported by infrastructure.

Inclusive and mixed neighbourhoods and communities

- 7.13 Lewisham is a diverse Borough comprising of many vibrant and distinctive neighbourhoods and communities, which makes it an exciting place to visit and live. However, it also ranks amongst the most deprived local authority areas in England with pockets of social and economic deprivation scattered across the Borough. We are committed to achieving inclusive and mixed communities, particularly in a way that is targeted at addressing the underlying causes of deprivation. The Local Plan seeks to facilitate a significant uplift in housing and our expectation is that new development should respond to existing imbalances in provision, so to better meet local needs and contribute to sustainable communities. This policy sets the strategic approach for securing an appropriate mix of housing when new development comes forward.
- 7.14 There is a significant need for more affordable housing in the Borough, as set out in the London Strategic Housing Market Assessment (2017) and Lewisham Strategic Housing Market Assessment (2019). Consistent with the draft

London Plan, we will seek that development contributes towards the Borough's strategic target of 50 per cent of new homes to be genuinely affordable. Residential development proposals will be expected to maximise the amount of affordable housing on-site, subject to viability, having regard to the requirements in Policy HO 3 (Genuinely affordable housing). The strategic target is for delivery across the Borough recognising a number of sites are likely to make provision in excess of the target, such as those associated with registered providers. We will work proactively with partners and industry stakeholders, including private developers, to secure the delivery of more high quality and genuinely affordable housing.

- 7.15 Development will be expected to respond to local need by securing a mix of dwelling sizes (in terms of occupancy measured by bed spaces), particularly family sized units (i.e. 3+ bedrooms). All proposals for major residential development will be expected to make provision for an element of family housing. Minor development proposals incorporating family sized units will be considered favourably. We will seek to resist against proposals involving the loss of family sized units (including through demolition and redevelopment). For affordable housing, proposals should have regard to the recommended unit size mix set out in the Council's Housing Strategy, or the Council's latest evidence base on housing need. All development proposals will be expected to demonstrate how the dwelling size mix is appropriate to the site in contributing to inclusive and mixed neighbourhoods and communities. This includes consideration of existing and planned community infrastructure, and other strategic infrastructure, necessary to support the development and its likely occupiers. We will assess proposals having

regard to the location and size of the site, the nature and scale of development, along with the existing mix of unit sizes within the locality.

- 7.16 To help secure inclusive and mixed neighbourhoods and communities, we will resist proposals that comprise solely of studios and 1 bedroom, 1 person units or those that would result in an overconcentration of 1 or 2 bedroom units on a site or locality. This policy is considered to provide sufficient flexibility to respond to individual site circumstances, such as where there are site constraints or where proposals for provision would demonstrably enhance the mix and balance of housing unit types within a locality. Studio units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need. In exceptional cases, proposals for studio units may be permitted where they are of an exceptional design quality, minimum space standards are satisfied and the development is appropriately located, in a highly accessible location that benefits from good provision of local amenities.

Housing choice

- 7.17 The availability of a wide range of housing choices, with provision for a mix and balance of housing types, sizes and tenures is essential to the achievement of inclusive neighbourhoods and communities. We will generally support proposals that enhance housing choice and access in the locality, including for new specialist forms of accommodation tailored to specific groups (including older people, students, those with disabilities and vulnerable people). The Local Plan sets out additional policies that address the unique housing requirements of

such groups, having regard to identified needs, including QD2 (Inclusive and safe design), HO5 (Accommodation for older people), HO6 (Supported housing) and HO7 (Purpose built student accommodation).

- 7.18 Lewisham is gaining a reputation as a location for innovative housing design. For example, PLACE/ Ladywell is an award winning scheme recognised for its pioneering off-site construction techniques and modular building format. It comprises of temporary accommodation for homeless families and start-up space for local businesses and retailers. We are broadly supportive of proposals for such innovative housing designs where they comply with other Local Plan policies. On proposals involving meanwhile uses, we will take a positive and flexible approach to decisions if it can be demonstrated that development helps to meet identified local housing needs, makes a positive contribution to the locality and does not adversely impact on amenity. Further requirements are set out in policy EC22 (Meanwhile uses).
- 7.19 Those currently living or working locally in the Borough should have a good opportunity to access new housing as it is made available on the private market. We will therefore encourage developers and agents to advertise new units locally, ideally for a period of 3 months, before marketing them more widely. Whilst the Council exercises no planning control in this respect, it will broadly support developers and agents in making a reasonable proportion of new residential units available to local residents, UK citizens and others with a strong connection to the Borough, particularly for owner occupation.



HO2 Optimising the use of small housing sites

- A The development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes. Opportunities should be taken to optimise the capacity of small sites for new housing development across the Borough, including through:
- a. Redevelopment of vacant and underused brownfield sites, and ancillary buildings such as garages;
 - b. Residential conversions, having regard to Policy HO2.E below;
 - c. Residential alterations and extensions, having regard to Policy QD10 (Building alterations, extensions and basement development); and
 - d. Infill and backland development, having regard to Policy QD11 (Infill and backland sites, garden land and amenity areas).
- B To help facilitate the appropriate development of small sites for housing, including through the sensitive intensification of existing buildings and sites, the Council will prepare a suite of supplementary planning documents. Development proposals will be expected to have regard to this planning guidance, where relevant, and demonstrate how it has been used to inform the development through the design-led approach.
- C Development proposals for housing on small sites will be supported where they help to facilitate the delivery of the spatial strategy for the Borough and:
- a. Are appropriately located for residential use;
 - b. Are designed to a high quality standard with accommodation that meets the relevant standards for private internal and outdoor space, having particular regard to Policy HO5 (High quality housing design);
 - c. Respond positively to local character, including historical character;
 - d. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
 - e. Contribute towards the delivery of affordable housing, in line with Policy HO3.J (Genuinely affordable housing);
 - f. Protect and do not adversely impact on local amenity;
 - g. Do not result in the loss of community infrastructure, having regard to Policy C11 (Safeguarding and securing community infrastructure); and
 - h. Do not prejudice the delivery of strategic site allocations.
- D Neighbourhood forums are strongly encouraged to identify locations and allocate sites appropriate for housing development, including small sites, within neighbourhood plans.

Housing conversions

- E In order to maintain a supply of housing suitable for families, proposals for the conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where:
- a. The gross internal floor space of the existing dwelling is 130 sq. metres or greater;
 - b. A family sized unit (3+ bedrooms) is re-provided, unless it is demonstrated that the property is not suitable for family accommodation due to environmental or other site constraints;
 - c. All housing units benefit from a layout and configuration that is practical for residential occupation, and the development complies with other relevant policy requirements for housing and high quality design;
 - d. In the situation garden land is available, access to this private amenity space is maintained for the existing family unit, and wherever possible, made accessible to residents in other units; and
 - e. It is demonstrated that existing and additional demands for parking and servicing created by the development can be appropriately accommodated, having regard to other Local Plan policies, including Policy TR4 (Parking) and SD12 (Design to support the circular economy);
 - f. The development would not result in an adverse impact on local character and townscape.
- F Proposals for the conversion of properties into Houses in Multiple Occupation will be considered against Policy HO 8 (Houses with Shared Facilities – Houses in Multiple Occupation).

Explanation

- 7.20 The NPPF (2019) places a strong emphasis on the role of small sites in supporting housing delivery. This is also reflected in the draft London Plan, which introduces a significant step change in the strategic approach to meeting housing need across the Capital. As part of this approach, it seeks to increase the rate of housing delivery from smaller sites. This is particularly in highly accessible residential and outer suburban areas, where there are considered to be key opportunities to intensify sites. All boroughs are expected to help facilitate the development of small sites in a positive and proactive way. This policy establishes our approach to ensuring that small site development is appropriately managed in the Lewisham context.
- 7.21 The draft London Plan sets out a ‘small sites’ housing target for every borough. Small sites are defined as those that are less than 0.25 hectares. The targets are based on trends in housing completions on sites of this size. The small sites target is a component of, and not additional to, the overall housing target set by the draft London Plan. For Lewisham, the small sites target for the ten-year period from 2019/20 is 3,790 net housing units, or 379 units per year. This is broadly in line with our monitoring of ‘windfall’ development on small sites in the Borough. The small sites target makes up roughly 23 per cent of the borough’s overall draft London Plan target.
- 7.22 Through the Local Plan we are seeking to boost the delivery of small housing development beyond the historic delivery levels. Our aim is not only to meet the draft London Plan small sites target but to exceed it, recognising a variety of measures are needed to achieve the overall housing target and meet the range of housing needs of different groups in the Borough. This includes need for genuinely affordable housing. Through the development and sensitive intensification of small sites, there will be more opportunities to secure planning contributions that can be invested in the delivery of new affordable housing units. Furthermore, small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, discussed in Part 3, has a distinctive character and urban grain based on its historic estate development. There is a lack of large site opportunities to generate investment in this area. Small site development provides a mechanism for more incremental investment and area improvement that can help to address the



Infill by 31/44-architects and Anna Stathaki

underlying causes of deprivation. In short, our positive approach to small site development is informed by the Local Plan's strategic objectives, and is not simply a matter of housing numbers.

7.23 There are a variety of opportunities and types of small sites that can support new housing development. Vacant and underused brownfield sites along with redundant ancillary facilities, such as garages or residential storage units, present relatively straightforward options for redevelopment. However these types of sites are limited in availability and are often constrained, such as by irregular plot forms, site access issues or land-use designations (including those that protect land for commercial uses). It is therefore expected that the majority of small sites development will occur in existing residential areas, where new homes can be sensitively integrated with other compatible uses. Housing development on small sites can take a number of forms including: new build, infill and backland development, conversion (subdivision of houses into flats), demolition and redevelopment or extension of existing buildings (including upward, rear and side extension, and basement development).

7.24 Our approach to housing development on small sites is expected to facilitate the incremental intensification of existing residential areas, particularly where sites have a good Public Transport Accessibility Level (PTAL 3-6) and/or they are within 800 metres of a station or Major/District town centre. It is imperative that future growth and development occurs in a way that respects and enhances local character, with the distinctive features of Lewisham's communities

at the heart of the design-led approach. The Lewisham Characterisation Study (2019) identifies areas that are positioned to facilitate an uplift in small housing development, recognising that the physical character of some areas may need to evolve gradually over time, for example, to accommodate new housing and investment in infrastructure. The Characterisation Study defines areas on a spectrum of sensitivity to change, based on local character, taking into account factors such as existing urban grain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. All proposals for small housing development will be expected to refer this document, as a starting point, to understand the scope for intensification in a given area and to gain an appreciation of the key features of local character.

7.25 The Characterisation Study must be read in conjunction with other design guidance to ensure that development is appropriate to the site and surrounding area. The Council will prepare and make available a suite of guidance documents to assist with the implementation of this policy. This includes existing and additional Conservation Area Appraisals and the Alterations and Extensions SPD (2019). We are also preparing future guidance to support the sensitive intensification of areas, including the A21 Design Guide SPD and Small Sites SPD, both of which will be prepared with support from the GLA Homebuilding Capacity Fund. This local guidance should be read alongside the design principles for small housing development that the Mayor of London has committed to publishing.

7.26 Where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Measures may include the return of hard standing to green space, installation of green roofs and walls, and sustainable landscaping. In exceptional circumstances, where site constraints demonstrably preclude the implementation of on-site measures, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use legal agreements and/or planning contributions.

7.27 This policy presents a new strategic approach to meeting housing need locally. An allowance for small site development has been made in the Local Plan housing trajectory. This sets out the expected rate of housing delivery over the plan period, based on past trends. We will monitor progress towards the small site housing target through the Authority Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide us with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary, for example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

Housing conversions

7.28 The Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. The conversion of larger and single family homes into flats has in recent years provided a small source of housing supply in Lewisham. Whilst recognising that conversions support delivery towards the strategic housing target, it is important that provision for family accommodation is not compromised. The Local Plan therefore sets out requirements to ensure that family sized units (3+ bedrooms) are retained when residential conversions come forward. This is particularly in light of the Lewisham SHMA (2019), which shows a particular local need for family housing.

7.29 There is a limited supply of family sized housing units in the Borough, with SHMA indicating that 1 and 2 bedroom units comprise the majority of existing properties (roughly 60 per cent). Furthermore, monitoring information demonstrates that the vast majority of recent new build residential development has been for flats or apartments, mainly 1 and 2 bedroom units, and it is anticipated that this trend will continue into the future. With the Lewisham SHMA suggesting that there will be an increasing need for family accommodation, we will seek to ensure that existing family sized units are not unnecessarily lost through conversion. This policy is not considered to inhibit the achievement of the small sites housing target, as proposals will continue to be supported where adequate family sized units are retained or re-provided.

7.30 Whilst we are intent on retaining family sized units on residential conversions, some flexibility may be applied where it can be suitably demonstrated that environmental or other site specific constraints make re-provision of a family sized unit inappropriate. This includes consideration of the site or building size (which might compromise achievement of the minimum space standards for a 3+ bedroom unit), lack of amenity space suitable for a family, or other environmental constraints that would adversely impact on occupants, particularly children and young people.

7.31 Having regard to site location, PTAL levels and relevant parking standards, proposals will be required to demonstrate that the residential conversion will be able to cope with any demand for parking arising from the development, including for disabled and cycle parking. Where appropriate, evidence of a parking survey will be required to support the proposal, having particular regard to on-street parking capacity.

H03 Genuinely affordable housing

- A The strategic target is for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable. The Council will seek the maximum amount of genuinely affordable housing to be delivered on new housing developments. Proposals that deliver high quality affordable housing through the Fast Track Route, as detailed in H03.F below, to achieve a minimum 35% affordable housing will be considered favourably.
- B The affordable housing requirement will apply to all forms of conventional housing in the C3 Use Class, unsecured student accommodation and, where appropriate, specialist and supported accommodation. Affordable housing requirements for Purpose Built Student Accommodation are set out in Policy H08 (Purpose Built Student Accommodation).
- C Proposals involving new housing development will only be supported where the site capacity has been optimised and delivery of affordable housing maximised. The affordable housing requirement will also apply in circumstances where development has already been permitted and:
 - a. New residential units are proposed which would result in an uplift in the overall number of units on the site of the extant permission; and
 - b. Development is proposed on an adjacent site, which, by virtue of its layout, design and use, is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites.
- D Applicants will be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Lewisham. Development proposals will be considered favourably where they demonstrably deliver the maximum viable amount of affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, as set out in H03.F, and secure grant funding to deliver provision of genuinely affordable housing additional to this level.

Large sites

- E Proposals for new housing development, including mixed-use schemes, with site capacity to accommodate 10 or more dwelling units must deliver the maximum amount of genuinely affordable housing, taking into account:
 - a. Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability;
 - b. The need for provision of a mix of secure housing tenures, with the affordable component sought to be provided on the basis of a tenure split of 70 per cent genuinely affordable (social rent or London Affordable Rent) and 30 per cent intermediate (London Living Rent or shared ownership);

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- c. The preferred housing size mix for genuinely affordable housing, as set out in the Council's Housing Strategy, or other supporting evidence;
 - d. Availability of public subsidy; and
 - e. Other planning benefits that may be achieved, having particular regard to the delivery of the spatial strategy for the Borough.
- F A threshold approach to viability will be applied to major development proposals, in accordance with draft London Plan policy H6 (Threshold approach to applications), taking into account the different routes to affordable housing delivery (i.e. Fast Track Route and Viability Tested Route). In Lewisham, the threshold level of affordable housing on gross residential development, which is not on public sector land, is set at:
- a. A minimum of 35 per cent; or
 - b. 50 percent for Strategic Industrial Locations and Locally Significant Industrial Sites where development would result in a net loss of industrial capacity.
- G Where the Viability Tested Route is used and a viability assessment is submitted to support the level of affordable housing provision made by a proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the existing/alternative use value, in line with National Planning Practice Guidance. In order to ensure transparency in the planning process, the viability assessment will be required to be undertaken in line with the Mayor's Affordable Housing and Viability SPG.
- H To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG.
- I In order to promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated that:
- a. It is not practical or feasible to provide affordable housing on-site due to site development constraints;
 - b. A higher level of affordable housing can be secured through provision on an alternative site;
 - c. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing;
 - d. The provision will better support inclusive and mixed communities.
- Small sites**
- J Proposals for new housing developments delivering less than 10 dwelling units will be required to make a financial contribution towards the delivery of affordable housing, having regard to the Council's Planning Obligations Supplementary Planning Document, or other guidance as appropriate. Proposals should seek to deliver on-site provision wherever practical and feasible,
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before considering the use of planning contributions to support the delivery of affordable housing off-site.

- K Development proposals on small sites will also be considered against Policy HO3.C above. Affordable housing requirements for large sites will apply where 10 or more dwelling units are proposed on small housing sites, whether these units are brought forward on one site or together on multiple, functionally related sites.

Inclusive and mixed neighbourhoods and communities

- L In order to secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions), along with development viability.
- M All new affordable housing development must be designed to a high quality standard, having regard to other Local Plan policies. Development should be sensitively integrated into the site and its surroundings, with affordable housing units being indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity provision. Where mixed tenure schemes are proposed, these will be required to ensure all residents of the development have access to amenities and communal spaces, including play spaces.

Vacant Building Credit

- N The application of the Vacant Building Credit (VBC) is not appropriate in Lewisham. The use of VBC will only be considered in limited circumstances, where applicants suitably demonstrate there are exceptional reasons why it is appropriate and the following criteria are met:
- The building is not in use at the time the application is submitted;
 - The building is not covered by an extant or recently expired permission;
 - The site is not protected for an alternative land use; and
 - The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.



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- 1 Heathside and Lethbridge
- 2 Place Ladywell
- 3 Excalibur Estate
- 4 Bampton Estate
- 5 Mercator Road

Explanation

The need for genuinely affordable housing

- 7.32 There is a strong record of housing delivery in Lewisham, with the cumulative London Plan housing target being exceeded since the adoption of the Core Strategy in 2011. The extent of housing delivery is indicative of a strengthening market and growing developer confidence in the Borough. Against this backdrop, however, issues persist with respect to the resident population's ability to access to housing that is affordable within their means.
- 7.33 The Lewisham Strategic Housing Market Assessment (SHMA) indicates that whilst median house prices in Lewisham are lower than those for London on whole they have increased by more than 300 per cent over the past twenty years, marked by an accelerated rate of increase in the five-year period from 2013 to 2017, with median house prices rising from £259,000 to £412,000 in this short period. The rate of increase is significantly higher than that experienced across London and in many neighbouring authorities. Home ownership is now out of reach for many Lewisham residents, particularly first time buyers, with median house prices more than 10 times the average household income. The cost of private rented sector housing has also increased pointedly over recent years. By 2017, average private rents in Lewisham equated to roughly 43 per cent of average household incomes, making this housing option unaffordable to many. The above situation has contributed to acute issues of overcrowding and homelessness in the Borough, which is reflected by the extensive number of households on the Council's Housing Register. As of May 2019 there were approximately 10,000 households on the housing waiting list, which represents approximately 7.6% of households

in the Borough.²⁹ In short, the gap between incomes and housing costs is rapidly widening, and as a consequence there is a significant local need for affordable housing.

- 7.34 In light of the above, the Local Plan sets a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. The strategic target is considered to be in line with the draft London Plan. However, recognising the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population, a local definition of 'genuinely affordable housing' is necessary. In Lewisham, this means housing at social rent levels or GLA's London Affordable Rent level³⁰ and below, aiming for target rents. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing. Furthermore, genuinely affordable housing and intermediate housing should provide for secure tenancies. For affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.
- 7.35 Our expectation is that the maximum amount of genuinely affordable housing will be delivered on all new residential development sites, having regard to viability. Habitable rooms will be used as the basis for calculating affordable housing provision against the Borough's strategic target, as advocated by the draft London Plan. This measure provides flexibility to deliver affordable

²⁹ Lewisham Housing Department statistics, May 2019.

³⁰ GLA London Affordable Rent is defined locally as London Affordable Rent, minus the 1% above Consumer Price Index uplift.

housing that is best tailored to meeting the range of local needs, and in particular to enable additional provision of affordable family sized units to come forward.

7.36 Affordable housing will be required from all large sites with capacity to accommodate 10 or more residential units, and this applies where development is proposed incrementally. This includes variations to a planning consent resulting in additional units on the site. This policy seeks to guard against actions to circumvent the affordable housing requirements, such as through the artificial sub-division or phased development of sites. In considering whether the affordable housing requirement should apply in these circumstances, we will have regard to: extent of single ownership of land and sites; occupied status of land/sites at the grant of permission and at commencement of development; and the amount of time elapsed between permissions, completions and any new proposals. Contributions towards affordable housing will also be required on small sites for new housing developments delivering less than 10 dwelling units. Our latest evidence indicates that this requirement will not adversely impact on the development viability of small sites across the Borough. Further details to support implementation of this policy will be set out in a future update to the Planning Obligations SPD.

7.37 In line with the draft London Plan, a threshold approach to viability will be applied in Lewisham. This means that schemes meeting or exceeding the draft London Plan policy and threshold (as set out in Policy H6 – Threshold approach to applications) without public subsidy can be ‘fast-tracked’ and are not required to submit

detailed viability information. However, to ensure an applicant fully intends to build out the planning consent, an early stage viability review will be triggered if an agreed level of progress on implementation of the development is not made within a specified time period. Thresholds are expected to be regularly reviewed by the London Plan, and may therefore change over the course of the plan period.

7.38 All development proposals will be expected to demonstrate that they have maximised the amount of genuinely affordable housing on-site in contributing to the delivery of the Borough’s affordable housing target. Applicants are encouraged to investigate realistic options to provide a further uplift of genuinely affordable housing (i.e. beyond that which can be viability delivered through development value alone) including through the use of public subsidy. This will require engagement with industry stakeholders, including Registered Providers, early in the development process to identify and capitalise on opportunities available. Where subsidy is secured, applications will be expected to clearly state the level of affordable housing that is to be provided using this subsidy. This clarification is required in order to assess schemes against the policy requirements, and for effective and transparent implementation of the threshold approach.

7.39 Proposals that do not provide the minimum required amount of genuinely affordable housing will be strongly resisted. Where applicants consider there are exceptional circumstances affecting the viability of a scheme and delivery of policy objectives, we will require that these are set out in a detailed Viability Assessment.

This must be undertaken by a suitably qualified professional (such as one accredited by the Royal Institute of Chartered Surveyors) and will be made publicly available upon validation of the planning application. All such assessments will be considered having regard to higher level policies and associated guidance. This includes the NPPF and companion National Planning Practice Guidance on 'Viability and decision taking', the London Plan and Mayor's Affordable Housing and Viability SPG (2017). A lower level of affordable housing will only be permissible where there are clear barriers to delivery and development is fully justified through detailed viability information. We may require that an independent appraisal of the Viability Assessment is undertaken, which will need to be paid for by the applicant.

7.40 Consistent with national planning policy, our expectation is that affordable housing will be delivered on-site. This is in order to promote inclusive and mixed communities, as well as to help ensure that there is no undue delay to the delivery of affordable housing when it is included with proposals for market housing. However, there may be exceptional circumstances where it is appropriate to deliver affordable housing off-site, including through payment-in-lieu contributions. Applications will be required to provide robust justification for any off-site provision, having regard to the criteria in the policy. Viability alone will not be considered sufficient justification for off-site provision.

7.41 When off-site provision is acceptable in principle, we will expect all subject sites to be considered together for the purpose of calculating the level of affordable housing provision required. All off-

site affordable housing must be provided within the Borough and be appropriately located, having regard to other policies that seek to provide residents with high quality living environments. Payment-in-lieu contributions may be accepted where there are demonstrable benefits in furthering affordable housing provision. Payments will be ring-fenced, and where appropriate pooled, to help maximise affordable housing delivery locally. Applicants should refer the Mayor's Affordable Housing and Viability SPG (2017), along with the Council's Planning Obligations SPD for further guidance.

7.42 Viability 'review mechanisms' are reappraisal tools that can be used to ensure maximum public benefit is secured from development, including benefits associated with affordable housing delivery. Review mechanisms can be particularly important on phased schemes or schemes with longer build out periods, and are a useful way to respond to economic uncertainties that may arise over the lifetime of a development proposal. We will seek to apply viability review mechanisms as a standard practice, and implement them in line with the London Plan and its associated guidance. This will help to ensure that if there is an improvement in viability over lifetime of the development proposal, this contributes to the maximum amount of affordable housing provided. Further details on the implementation of this approach are set out in the Mayor's Affordable Housing and Viability SPG (2017).

7.43 The most pressing need in Lewisham is for new social homes with social rents. However there is also a need for affordable housing which is available to people who are unable to access social housing due to the rigorous eligibility

criteria, but are also unable to afford private market housing. Therefore, where affordable housing is required on new development this should be provided on a tenure split basis of 70 per cent social rent or London Affordable Rent and 30 per cent London Living Rent or shared ownership. We support the use of London Living Rent, as by its nature, it is affordable to households earning the Lewisham median household income. Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable.

7.44 In line with other Local Plan policies, all new affordable housing development must be of a high quality design and incorporate durable materials, adhering to the same space and amenity standards as market housing. To promote inclusive and mixed neighbourhoods and communities it is imperative that affordable housing is designed to be 'tenure blind', so that it is indistinguishable from other types of housing. Affordable housing must also be sensitively integrated into the site and its surroundings to ensure that all local residents, irrespective of tenure type, are provided with high quality living environments and are able to benefit from shared access to all on-site amenities.

Vacant Building Credit

7.45 Vacant Building Credit (VBC) was introduced by the Government, in 2014, as a way to incentivise development on brownfield sites. It is a material consideration in planning decisions. VBC applies to sites where a vacant building is brought back into lawful use, or is demolished to be replaced by a new building. Notably, VBC reduces the requirement for affordable housing contributions, taking into account the amount of vacant floorspace being brought back into use or redeveloped. This can have significant implications in the Borough where there is a demonstrated strategic need for affordable housing.

7.46 Application of the VBC is not considered appropriate in Lewisham. Monitoring indicates a strong rate of housing delivery locally, with the Borough exceeding its cumulative London Plan housing target since the adoption of the Core Strategy in 2011. Further, there is a pipeline of committed sites (with planning consent) and allocated future development sites, all of which are on brownfield land. Accordingly, brownfield sites are coming forward irrespective of the VBC and we do not consider that this additional incentive is necessary, particularly in an inner-London context where the relatively high land values help to support the viability of residential led schemes. Where proposals involve the use of VBC, evidence must be provided to demonstrate that there are exceptional circumstances in which to justify its application, having regard to the tests and requirements set out in this policy.

7.47 It should be noted that if an applicant is claiming that a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy relief through the vacancy test.



Batavia Road



HO4 Housing estate maintenance, renewal and regeneration

- A The maintenance, renewal and regeneration of Lewisham's housing estates will play an important role in helping to ensure that neighbourhoods benefit from high quality living environments, housing is maintained at a decent standard and new genuinely affordable housing is delivered locally.
- B Where strategic housing estate renewal and regeneration is proposed this will be carried out in consultation with existing residents and the local community, in line with the London Mayor's Good Practice Guide to Estate Regeneration, in order to ensure:
- a. There is no net loss of affordable housing, and an uplift in genuinely affordable housing is delivered wherever possible;
 - b. A range of high quality, genuinely affordable housing options are made available in the Borough;
 - c. Existing and new residential units achieve the Decent Homes standard;
 - d. The development is designed to a high quality standard and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies; and
 - e. Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration.

Explanation

- 7.48 We are committed to ensuring that all Lewisham residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough. Also, that existing residences are brought up to and maintained at an appropriate standard, particularly within Lewisham's housing estates. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents.
- 7.49 The Decent Homes programme provides one mechanism for housing improvement and has been successfully delivered across the Borough. However, funding is limited and this type of investment may not always be feasible or viable for some houses or estates. For example, the existing condition or orientation of buildings can act as a practical constraint to refurbishment works. Nonetheless the Council has a strong record in this regard, and through Lewisham Homes, the proportion of residential units meeting the Decent Homes standard increased from 41 per cent to 94 per cent in the 10-year period from 2007.
- 7.50 Housing estates have been developed in the Borough over many decades. Their age and condition varies and therefore so too does the programme of maintenance required for each. Some older estates constrain opportunities for site or area wide improvements. For instance, their layout or design makes it difficult to introduce safer access points and through routes, more useable amenity space or public realm enhancements. In other circumstances, there may be options to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.
- 7.51 The nature of the programme for housing estate maintenance, renewal and regeneration will vary on a case-by-case basis. This policy will help to ensure that that all such investment is appropriately managed, irrespective of the level of works involved, and that local residents ultimately benefit from improved access to high quality, inclusive and genuinely affordable housing and living environments.

- 7.52 All strategic estate renewal and regeneration schemes will be carried out in consultation with existing residents and the local community. The process will be in line with the London Mayor's Good Practice Guide to Estate Regeneration (2016) and the Council's latest adopted Statement of Community Involvement. In line with Policy HO 1 (Meeting Lewisham's housing needs) all proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing. Loss of existing affordable housing will only be supported where it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis.³¹ Floorspace is used as the measure for replacement provision as this provides flexibility for the Council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. This approach is consistent with that provided in the draft London Plan.

³¹ Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost



H05 High quality housing design

- A High quality design is integral to ensuring housing that meets the diverse and changing needs of Lewisham residents over their lifetimes. All new housing development should provide adequately-sized rooms and spaces with comfortable and functional layouts along with well-integrated amenities. This includes proposals for new-build housing development, changes of use, alterations and extensions.
- B Proposals for new housing development must meet, and wherever possible seek to exceed, the housing standards set out in the London Plan, including the minimum standards for:
 - a. Private internal space, having regard to:
 - i. Internal floor area and built-in storage area;
 - ii. Bedroom size;
 - iii. Ceiling height
 - b. Private outside space, having regard to:
 - i. Outside space adequate for the intended number of occupants;
 - ii. Minimum depth and width of balconies or other private outdoor spaces;
 - c. Communal amenity space; and
 - d. Children's play space, having regard to Policy CI 3 (Play and informal recreation).
- C Development proposals for new housing must address the qualitative design aspects set out in draft London Plan Policy D4 (Housing quality and standards) and corresponding Table 3.2, covering the detailed considerations for:
 - a. Layout, orientation and form;
 - b. Outside amenity space; and
 - c. Usability and ongoing maintenance.
- D Housing development should be designed to be inclusive, accessible and safe to all, having regard to the requirements of Policy QD2 (Inclusive and safe design).
- E Housing development should protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity).
- F Housing development must be designed to be 'tenure blind' to ensure that houses across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards, access and amenity provision.
- G Housing development should maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling, having particular regard to:
 - a. Building layout and orientation;
 - b. Outlook for occupiers;
 - c. Microclimate management including for heating, cooling and ventilation; and
 - d. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.

Explanation

- 7.53 Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. We will seek to ensure that all new housing development, irrespective of tenure, is designed to a high quality standard and meets the diverse needs of Lewisham's resident population. This includes new build housing, as well as proposals involving the alteration or extension of existing housing units, as well as conversion of other buildings into housing.
- 7.54 The quality and standard of housing is a key issue in Lewisham. One in four residents now live in the private rented sector, which is double that of 15 years ago. We estimate that a quarter of private rented properties are non-decent. As further evidence, between January 2015 and October 2018 the Council received over 2,000 complaints about the condition of private rented properties. We inspected all these properties and found around half of them had poor energy efficiency (rating of D or below). Whilst the proportion of social housing units meeting the Decent Homes standard increased from 41% to 94% in the ten years from 2007, the Council's own research suggests private sector housing is not achieving the same level of standards.³²
- 7.55 We will apply the London Plan space standards when considering housing proposals (including for internal and outside space, communal amenity space and children's play space). We will also have regard to the qualitative design aspects set out in draft London Plan Policy D4, along with other Local Plan policies. Applicants are advised to refer the London Plan for further details. Development proposals must meet and should seek to exceed the minimum standards.
- 7.56 Housing developments should seek to maximise the provision of genuinely affordable housing. They should also support inclusive neighbourhoods and communities by ensuring that housing of all tenure types are designed to a high quality standard and well-integrated, both within the development and with neighbouring residential properties. Housing should be designed to be 'tenure blind' so that units are similar in external appearance, with entrances and access routes that promote social inclusion. Communal amenity spaces must be accessible to all residents of the development, regardless of tenure.
- 7.57 Dual aspect dwellings with opening windows on at least two sides have many benefits for the amenity of building occupiers, including for daylight, outlook and natural ventilation. Single aspect dwellings do not offer the same benefits, particularly for natural ventilation, which is problematic in terms of climate change adaptation. Single aspect dwellings will therefore only be acceptable in exceptional circumstances, and should be avoided where they are north facing, contain three or more bedrooms, or exposed to noise and air pollution levels above which significant adverse effects on health and quality of life occur. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed.

³² Lewisham Housing Strategy 2020-2026. Lewisham Council



HO6 Accommodation for older people

- A The housing needs of older people will be met mainly through conventional residential accommodation that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime, whether through new build development or the appropriate retrofitting of existing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the varying requirements of Lewisham's older resident population.

Specialist older person's accommodation

- B Development proposals for specialist older person's accommodation will be supported where they address an unmet local housing need and:
- Respond positively to the objectives in Lewisham's Housing Strategy;
 - Make provision for a mix of tenure types including affordable housing, in line with Policy HO3 (Genuinely affordable housing);
 - Are sited at well-connected locations that are easily accessible to public transport, shops, services, leisure and community facilities appropriate to the intended occupiers;
 - Are designed to a high quality standard with fit for purpose accommodation and facilities suited to occupiers, staff and visitors, giving consideration to:
 - The level of independence of occupiers and corresponding level of managed care provision or support;
 - Provision of accessible housing, in line with Policy QD2 (Inclusive and safe design);
 - Private, communal and public amenity space; and
 - Access and servicing arrangements, including for all types of vehicles expected to access the development.
- C All proposals for specialist older person's accommodation must demonstrate that residents will be sufficiently supported by community infrastructure (such as health and leisure facilities) that is easily accessible from the site, taking into account the mobility requirements of the intended occupants, and can cope with new demand arising from the development.
- D Development proposals resulting in the net loss of floorspace for specialist older person's accommodation will be resisted unless it can be demonstrated that:
- There is a long-term surplus of the specific type of accommodation in Lewisham (i.e. there is no unmet local need); or
 - Adequate replacement provision will be provided, whether on-site or elsewhere within the Borough; and
 - The existing accommodation is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.
- E Where the loss of specialist older person's accommodation is acceptable in line with (D) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including affordable housing, where appropriate..

Care home accommodation

- F Development proposals for care home accommodation will be supported where they are appropriately located and designed to a high quality standard, having regard to the requirements of HO6.B(c-d) and HO6.C. In addition, proposals must ensure that 100 per cent of habitable rooms are wheelchair accessible.
- G Development proposals resulting in the net loss of floorspace for care home accommodation will be assessed having regard to the requirements of HO6.D and HO6.E.
- H In order to ensure inclusive and mixed neighbourhoods and communities, development proposals must not result in a harmful overconcentration of care home accommodation within the locality.

Explanation

- 7.58 The number of older people in Lewisham is projected to increase significantly over the coming years. There was an estimated 40,400 people aged 65 and older in 2018 and this is projected to rise almost 50% in the next 15 years, up to 60,200 people by 2033³³. This is largely driven by the increase in the population aged 60–74, although there is also expected to be significant gains in the proportion of those aged 80 and above. We are committed to ensuring that a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.
- 7.59 Current and future needs for older person's accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough, there will be less reliance on specialist forms of older person's accommodation. We will therefore expect that all new residential development in the C3 Use Class is designed to be adaptable to the varying needs of users at all stages of life, in line with Policy QD 2 (Inclusive and safe design). We will also encourage the retrofitting of existing residential buildings and units to better suit the day-to-date needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting must ensure compliance with other Local Plan policies, particularly those on the historic environment. Internal or external alterations have the potential to harm the significance of heritage assets or otherwise impact on local character, and this should be considered early in the planning and design process.
- 7.60 The Lewisham SHMA (2019) indicates that there are a number of housing options available for older people in the Borough, including some 3,500 units of specialist accommodation with integrated elements of support or care. This provision is helping to meet the varying types of need, but it is recognised some additional capacity may need to come forward given the expected future growth in the Borough's older person population. The draft London Plan sets an indicative annual benchmark for the Borough of 100 units of specialist accommodation, and this should be considered in the context of more detailed local assessments of specific types of need.
- 7.61 We are broadly supportive of proposals for non-specialist forms of conventional housing in the C3 Use Class that are designed to be adaptable to the different needs of occupants over their lifetime, and therefore offer greater choice to older people. However, it is recognised that some people may choose or require specialist older person's accommodation. Proposals for such specialist accommodation will be supported where there is a demonstrable local need, having regard to the Lewisham SHMA (2019) and the Council's Housing Strategy, and other policy requirements are satisfied.

³³ Lewisham SHMA (2019)

- 7.62 The draft London Plan discusses the range of accommodation options that are available to older people. It clearly distinguishes between specialist older person's accommodation and care home accommodation. We will establish the nature of development proposals having regard to the definitions and attributes of specialist and care home accommodation set out in the draft London Plan, and consider proposals accordingly. For the avoidance of doubt, where the London draft Plan policy H13 (Specialist older persons housing) applies to a development proposal, then Local Plan policies H06 (B-E) will also apply.
- 7.63 Where a development does not meet the attributes of specialist older person's accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply.
- 7.64 Specialist accommodation should provide for a range of tenure types, including affordable housing. The needs of older people vary depending on their personal financial circumstances. Furthermore, need varies based on an individual's level of independence and the support they require. This policy seeks to ensure provision for a wide range of housing products to meet the different needs of older people in the Borough.
- 7.65 In assessing proposals for specialist older person's accommodation and care home accommodation we will give consideration to affordability and financial support available to the intended occupant group. It is acknowledged that arrangements for assessing affordability to people of pensionable age will be different to people of working age, especially when housing includes an element of care.
- 7.66 Specialist older person's accommodation and care home accommodation must be sensitively integrated into Lewisham's neighbourhoods, at well-connected and accessible locations. Residents, carers and visitors should benefit from easy access to the site as well as the surrounding area. Accessibility is vital to ensuring schemes adequately respond to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to prevent against isolation and loneliness, a key public health issue.
- 7.67 For facilities to be easily accessible they should generally be located at a distance of no more than 400 metres away from public transport, shops, services and other community facilities. The locality should also feature accessible pathways and gradients, enabling residents to travel to and from the site with relative ease whether by walking or through the use of aids, such as wheelchairs or mobility scooters. One of our key objectives is to ensure that neighbourhoods are made more liveable and inclusive to all, including through the delivery of a high quality public realm. This policy will work in tandem with other Local Plan policies to positively address the needs of people at all stages of their life.

- 7.68 Specialist older person's accommodation and care home accommodation should be well integrated into the site and its wider surroundings, with careful consideration given to layout and design. Where appropriate, proposals should promote and adequately respond to requirements for the sharing or joint use of facilities, particularly to encourage a sense of community belonging. Development should also be designed to ensure a good fit between the facilities supplied and the specialist needs of the intended occupants. This includes consideration for amenity space (private, communal and public), storage, charging of mobility scooters, as well as adequate access and parking for the vehicles expected at the site, such as taxis, mini-buses and ambulances.
- 7.69 Residential accommodation will be expected to meet the latest industry standards. We will require applicants to ensure development is informed by the latest good practice guidance. Planning statements should refer this guidance and clearly indicate how this has been taken into consideration.
- 7.70 We will seek to protect against the loss of floorspace for specialist older person's accommodation and care home accommodation. Proposals involving the loss of change of use of such housing must suitably demonstrate that there is not a long-term local need for the type of provision in question, or that adequate replacement provision will be provided within the Borough. Furthermore, there should be clear evidence that the existing facility is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.
- 7.71 When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies HO 1 (Meeting Lewisham's housing needs) and HO 3 (Genuinely affordable housing), and any need to generate funding for replacement specialist accommodation elsewhere. If replacement housing is provided elsewhere we will consider the proportion of affordable housing provided across both sites. Proposals for redevelopment for non-residential uses will be resisted, and the Council will seek to retain existing affordable housing, consistent with other Local Plan policies.

HO7 Supported accommodation

- A Development proposals for supported accommodation (including residential hostels and secured accommodation) will be supported where they:
 - a. Meet an identified need for the type of accommodation proposed;
 - b. Do not result in the net loss of existing permanent accommodation;
 - c. Make provision for a mix of tenure types including affordable housing, where appropriate, in line with Policy HO3 (Genuinely affordable housing);
 - d. Contribute to mixed and balanced neighbourhoods and communities without leading to a proliferation or harmful overconcentration of this type of accommodation in the locality; and
 - e. Are appropriately located and designed giving consideration to:
 - i. Accessibility to public transport, services and community facilities;
 - ii. Intensity of use that is appropriate to the size of the development;
 - iii. Accommodation and facilities that are suited to site occupiers and users, including arrangements for managed care or supervision, security and community safety; and
 - iv. Protection of the amenity of adjoining and neighbouring uses.
- B Development proposals resulting in the net loss of floorspace for supported accommodation will be resisted unless it can be demonstrated that:
 - a. The specific type of accommodation is no longer required for the particular group or other relevant groups in need of supported housing; or
 - b. Adequate replacement provision will be provided; and
 - c. The existing accommodation is not suitable for the support or care of the intended occupants in its current condition and format and/or is incapable of being maintained at an acceptable standard.
- C Where the loss of accommodation is acceptable in line with (B) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

- 7.72 It is important that people from vulnerable groups are provided with access to accommodation, whether for temporary stays or longer-term periods. Supported and other forms of specialised accommodation offer respite and provision of care for individuals with distinct needs. This includes people coping with physical or mental health issues, disabilities, impairments and other vulnerabilities, or those who are in transition and require support, such as refugees. Supported accommodation can take a variety of forms and fall into different Use Classes, depending on the nature of use and type of care or supervision required.
- 7.73 In line with Local Plan objectives to deliver inclusive communities, we are generally encouraging of supported housing where it clearly addresses an identified need, is well designed and sensitively integrated into the locality. It is vital that development is appropriate to the intended end users, so that the specific type of managed care or supervision required can be effectively delivered. Applicants are encouraged to design schemes through active engagement with relevant health and social care stakeholders, wherever possible. In order to contribute to the achievement of mixed and balanced neighbourhoods and communities, proposals should not result in an overconcentration of uses, particularly where this would adversely impact on amenity, community safety or local character.
- 7.74 Existing supported housing should be protected where it is in a suitable condition and need exists, whether for the specific group it is currently serving or other vulnerable groups. Need should be considered at both the local and sub-regional level, recognising that delivery of provision may require coordination of stakeholders across Lewisham and its neighbouring authorities. Proposals involving the loss of change of use of supported accommodation must sufficiently demonstrate that the existing provision is no longer required or that adequate replacement provision will be secured. Furthermore, there should be clear evidence that the existing facility is not suitable to support the intended occupants in its current condition or is incapable of being maintained at an acceptable modern standard.
- 7.75 Where it is accepted that an existing site or property is no longer appropriate for supported accommodation, we will seek to ensure that there is no net loss of residential floorspace. When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies HO1 (Meeting Lewisham's housing needs) and HO3 (Genuinely affordable housing). Proposals for redevelopment for non-residential uses will be resisted, and the Council will seek to retain existing affordable housing, consistent with other Local Plan policies.



H08 Purpose built student accommodation

- A Development proposals for Purpose Built Student Accommodation (PBSA) will only be supported where they:
 - a. Help to meet an identified strategic need for this type of housing, giving priority to local need;
 - b. Ensure that the accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education institutions;
 - c. Make provision for affordable student accommodation, in line with draft London Plan Policy H17 (Purpose built student accommodation); and
 - d. Do not compromise the delivery of the Borough's strategic requirements for conventional housing.
- B Development proposals for PBSA must be appropriately located:
 - a. At well-connected sites that have good levels of public transport accessibility and are easy to access by walking and cycling;
 - b. Within or at the edge of town centres, or other locations that benefit from good provision of shops, services, leisure and community facilities appropriate to the student population; and
 - c. To support mixed and balanced neighbourhoods and communities:
 - i. Without leading to a proliferation or harmful overconcentration of student accommodation in the locality; and
 - ii. Giving priority to sites located in proximity to the education institution(s) the development is intended to serve, or other higher education institutions in the Borough.
- C Development proposals for PBSA should be well-designed, sensitively integrated into the locality and ensure a high standard of amenity for student occupiers. All proposals will be expected to ensure:
 - a. A high quality living environment with a functional layout, good-sized rooms and well integrated communal areas and facilities;
 - b. Provision for wheelchair accessible accommodation, spaces and facilities, in line with Policy QD2 (Inclusive and safe design);
 - c. Amenity considerations are integral to the design-led approach (including for outlook, daylight and sunlight, noise impacts and ventilation);
 - d. Adequate on-site cycle parking facilities;
 - e. The accommodation is suitable for year-round occupation; and
 - f. Protection of the amenity of adjoining and neighbouring uses.
- D All development proposals for PBSA must be accompanied by a site management and maintenance plan, to be secured by planning condition.

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- E The loss of existing Purpose Built Student Accommodation will be resisted unless it can be suitably demonstrated that:
- a. There is no local demand for student accommodation to serve the existing or another higher education institution; or
 - b. Adequate replacement accommodation can be provided in an appropriate location accessible to the higher education institution it serves.
- F Where the loss of accommodation is acceptable in line with (E) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

- 7.76 High quality and affordable Purpose Built Student Accommodation (PBSA) is necessary to cater for the needs of London's student population. The majority of the Capital's existing PBSA is concentrated in central London, especially in the Boroughs of Camden, Islington, Tower Hamlets and Southwark. In order to improve access and prevent against the overconcentration of this type of use, the draft London Plan seeks to redress the distribution of provision across the region.
- 7.77 Whilst recognising there are student accommodation needs associated with education providers throughout London, we will aim to address local needs as a priority. Lewisham is home to a number of further and higher education institutions. This includes Goldsmiths College at New Cross, Trinity Laban Conservatory of Music and Dance at Deptford, and Lewisham College at Deptford Bridge and Lewisham Way. Greenwich University in the Royal Borough of Greenwich is also located nearby. It is important that Lewisham's student population is able to access affordable accommodation, ideally in proximity to the places where people take up studies. Furthermore, provision of PBSA has the added benefit of relieving pressure on the private rented market, enabling opportunities for others to access housing that might not otherwise be available.
- 7.78 We will take a positive view on proposals for new PBSA where there is an identified local or strategic need for this type of accommodation, and there are assurances that the development will be secured for student use. This general support is provided recognising that the Borough's main strategic requirement is for genuinely affordable, conventional housing. PBSA is defined as non-conventional housing, which for purposes of delivery against the Borough's strategic housing target, is counted on a 2.5:1 basis (i.e. two and a half bedrooms/units is equivalent to one unit of housing). Compared with conventional housing, where units are counted on a 1:1 basis, student accommodation may not always provide the most optimal use of land. We will resist proposals where it is considered that student accommodation will compromise or suppress delivery of conventional housing, for which need is greatest locally. This includes consideration of proposals for PBSA that would result in the net loss of existing housing units.
- 7.79 New PBSA must be developed and secured for occupation by students of one or more specific higher education institutions. This is to guard against speculative development and ensure proposals genuinely help to address identified need. Applications must provide evidence of an end user affiliated with an educational institution, and demonstrate appropriate management arrangements are in place so that rooms will be rented solely to students over the lifetime of the development, including an identified landlord, agent or management company. Consistent with the draft London Plan Policy H17, if the accommodation is not secured for use by students and for occupation by members of one or more specified higher educational institutions, development is not considered PBSA and will be considered against policies on shared housing and communal living, including HO8 (Housing with shared facilities).

7.80 Draft London Plan Policy H17 provides that at least 35% of PBSA should be secured as affordable housing. This is in order to ensure that students with an income equivalent to that provided to full-time UK students by state funded sources of financial support for living costs can afford to stay in PBSA. We will apply the definition of affordable student accommodation as set in the draft London Plan and its supplementary guidance. Affordable rent levels may be subject to periodic review over the life of the Local Plan, taking into account any significant changes that may be made to the Government's student maintenance loan regime.

7.81 New PBSA should be directed to well-connected and highly accessible locations, including those supported by good walking and cycling infrastructure. It is also important that PBSA is sited so student residents have access to a wide range of services and facilities. During the site selection process applicants should give priority to locations in proximity to the institutions that the development will serve. PBSA that is intended to meet need arising from outside of the Borough should be sufficiently justified in respect of the site location, both locally and in the individual site context.

7.82 New PBSA must be of a high standard of design and construction, with functional layouts and well integrated living and communal spaces and facilities. It should meet the latest industry standards as demonstrated through the use of Accreditation Network UK or other similar scheme. Student unit sizes and layouts should be varied, particularly to cater to the needs of wheelchair users, mature students with families, students who want to live alone and for groups

of students using shared facilities. The specific requirements of educational institutions should be considered and accounted for wherever possible.

7.83 Whilst many students require accommodation during term time only, some residents will use accommodation as their permanent address and development therefore should allow for year round occupation. To help ensure the viability of PBSA, we will provide flexibility to allow for the temporary or ancillary use of accommodation during vacation periods or term breaks. Proposals will be considered on a case-by-case basis, and where acceptable in principle, we will use conditions or legal agreements to ensure that any temporary or ancillary uses do not result in a material change of use of the building.

7.84 PBSA can benefit Lewisham's neighbourhoods and communities, for example, by attracting a student population that supports the local economy, complements the creative and cultural industries and stimulates inward investment. However an overconcentration of student accommodation within a local area can adversely impact on the amenity of existing residents and uses, and also undermine objectives for delivering mixed and balanced communities. Where the scale or concentration of student housing is likely to harm local amenity, we will resist proposals or seek a range of mitigation measures to ensure development is appropriate. This may include planning contributions for any additional infrastructure provision required to support the development.

- 7.85 Site management and maintenance plans are important to delivering successful student housing schemes. These plans will be required for all new PBSA and will normally be secured as a planning condition. Management plans will be expected to cover matters such as site management and maintenance, on-site wardens, communal facilities, safety and security for occupants and elimination of potential noise nuisance.
- 7.86 We will seek to protect against the loss of existing student accommodation. This is particularly to ensure that such loss does not adversely impact on existing capacity or existing residents, whose displacement could create additional pressure on the conventional housing market. However, flexibility will be applied where it can be suitably demonstrated that demand for the provision in question no longer exists. We will encourage the refurbishment of buildings to ensure student accommodation is brought up to an acceptable modern standard. Proposals will be supported where there is adequate re-provision of accommodation and other policy requirements are satisfied.



Key
Article 4 Direction on HMOs

Figure 7.1: Article 4 Direction on HMOs

HO9 Housing with shared facilities (Houses in Multiple Occupation)

- A Development proposals for new housing with shared facilities (i.e. Houses in Multiple Occupation) (HMOs) in the Sui Generis Use Class will only be supported where they contribute to a beneficial mix and balance of uses within an area and:
- Do not result in the loss of existing larger housing suitable for family occupation;
 - Do not result in an overconcentration of HMOs in the area;
 - Do not give rise to adverse impacts on the amenity of the surrounding properties and neighbourhood, including cumulative impacts taking account of other HMOs in the area;
 - Are appropriately located in areas of good transport accessibility; and
 - Are well-designed and provide high quality accommodation that satisfies the relevant standards for HMOs along with other Local Plan policies, including for internal space standards and amenity space provision.
- B Development proposals for small HMOs in the C4 Use Class (i.e. 3 to 6 unrelated people) within any area covered by an Article 4 Direction will only be permitted where they contribute to a beneficial mix and balance of uses within an area and:
- The gross original internal floorspace of the existing dwelling is 130 sq. metres or greater; and
 - The requirements of (A)(b-e) above are satisfied.
- C Development proposals that result in the loss of an HMO, or the self-containment of any part of an HMO, will be resisted unless it can be suitably demonstrated that:
- The existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; and
 - Adequate replacement provision can be secured within the Borough, having regard to the requirements of (A) above, with no net loss in HMO floorspace; or
 - Any replacement use includes an element of residential provision that meets an acute local housing need, particularly genuinely affordable housing, with at least the equivalent amount of residential floorspace re-provided.
- Large-scale purpose built shared living accommodation**
- D Large-scale purpose-built shared living accommodation in the Sui Generis Use Class will generally be resisted as this type of use compromises opportunities to deliver conventional housing in the Borough. Development proposals will only be permitted where it is suitably demonstrated that:
- They meet an identified local need for the type of housing proposed;
 - Private residential units within the development are demonstrably not accommodation in the C3 Use Class;
 - There is adequate provision of communal facilities and services suited to the intended occupiers;
 - They are appropriately located and designed to a high quality standard, having regard to the requirements of (A) above;
 - The development will be suitably managed and maintained over its lifetime, as evidenced by a management plan;
 - Minimum tenancy lengths are available to occupants; and
 - A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class.

Explanation

7.87 A house with shared facilities, or House in Multiple Occupation (HMO), refers to a shared house, flat or other non-self-contained dwelling that is the main residence for 3 or more occupiers forming 2 or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two planning Use Classes for housing with shared facilities. A Use Class C4 HMO is a 'small' HMO used by 3 to 6 unrelated people. A 'large' HMO shared by more than 6 unrelated people is a Sui Generis use.³⁴

7.88 It is permitted to change a Use Class C4 HMO property to a Use Class C3 dwelling house without planning consent, and vice versa. Therefore, for planning policy implementation we will generally treat small HMOs in the same way as self-contained homes, with legislation controlling changes of use between these Use Classes. Exceptions apply in situations where an Article 4 Direction covers a specified area.

7.89 Planning permission is required for the use of land and buildings for large HMOs in the Sui Generis Use Class. Some forms of housing with shared facilities are not considered HMOs in planning terms (for example, Purpose Built Student Accommodation and supported housing) and these are addressed elsewhere in the Local Plan.

7.90 The London Plan acknowledges the role that HMOs play in London as a strategically important part of the Capital's housing supply, with provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock. In Lewisham, HMOs have contributed to making available a wider range of housing options over time. This is especially for low income residents and young people (including those under 35 years of age in receipt of the shared room rate housing benefit) and those requiring temporary accommodation.

7.91 To ensure that HMOs are built and maintained at an acceptable standard the Council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime we have published the Lewisham Standards for Licensable HMOs. All development proposals for new HMOs will be expected to ensure these standards are met as a minimum, irrespective of associated licencing requirements. The standards should be considered alongside other planning policies to ensure that new housing is fit for purpose.

7.92 Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness. For these reasons the loss of good quality shared living accommodation will be resisted, including where loss occurs through the self-containment of parts or all of buildings. We will seek to protect HMOs where there is good reason to believe they could be improved to a decent standard.

³⁴ The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

7.93 Consideration will be given to changes of use of existing HMOs where it is suitably demonstrated that the building does not meet local and other relevant standards, as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) 2006), and has no realistic prospect of meeting these. The Council's Environmental Health team will be consulted on a case-by-case basis to assist in determining the condition of the accommodation and whether it can be maintained at an acceptable standard. Where change of use or re-development is acceptable in principle, we will seek appropriate re-provision of residential floorspace giving priority to HMO or other accommodation to meet priority needs in the Borough, including genuinely affordable housing.

7.94 New HMOs should contribute positively to their localities by supporting the delivery of mixed and balanced communities. Proposals must demonstrate that the development will not result in a proliferation or harmful overconcentration of HMOs in the local area. This is to ensure an appropriate distribution of different types of housing provision across the Borough, along with the protection of amenity of immediate and neighbouring properties. Furthermore, as with other forms of higher density development, housing with shared facilities should be sustainably located in areas with good public transport accessibility levels (PTAL 3 or higher) and within easy access to facilities and services.

7.95 To help inform preparation of the Local Plan a review of HMO accommodation in Lewisham was undertaken.³⁵ The review considered

various data sources and concluded that while the Borough has not experienced a significant increase of HMOs in recent years, that there has been a notable change in the spatial distribution of HMOs. Specifically, the review identified a substantial increase and clustering of HMOs in Lewisham's southern wards, which have traditionally exhibited the lowest presence of this type of provision. As a result of these findings the Council has implemented a non-immediate Article 4 Direction, coming into force in March 2020, which will remove the Permitted Development rights for the conversion of single dwellings into small HMOs (3-6 bedrooms) within the wards Bellingham, Whitefoot, Downham and Grove Park. Proposals for new small HMOs in these wards will be considered against Part (B) of the policy.

Large-scale purpose built shared living accommodation

7.96 London has very recently experienced a rise in development of large-scale purpose-built shared living accommodation, including co-living schemes. These products are similar in format and layout to student housing but tend to include a bespoke range of facilities, services and communal spaces tailored to a wider range of occupants, such as young professionals. The draft London Plan defines this type of provision as a shared living accommodation generally comprising of 50 units or more. However, in Lewisham this will be considered on a case-by-case basis, with the London Plan and relevant Local Plan policies applying on developments of 20 or more units as a general guideline.

³⁵ Lewisham HMO Review and Evidence Paper Update (2018)

This is owing to the significant variances in the character, urban structure and mix of uses across the Borough, and the need to ensure development of this scale is appropriate to its location.

7.97 Whilst recognising that housing with shared facilities contributes to meeting housing need, our priority is to secure provision of genuinely affordable self-contained housing, including for families, as set out in Policy HO 1 (Meeting Lewisham's housing needs). We will therefore resist proposals for large-scale purpose built shared living in order to ensure new development optimises the use of land for conventional housing, particularly on larger sites that have capacity to accommodate major development.

7.98 Consistent with draft London Plan Policy H18, we will only support proposals for large-scale purpose-built shared living accommodation where there is an identified local need for such provision. Applications will be required to provide sufficient justification for accommodation of this type and demonstrate there is a clear local market need for it. This is to ensure that development does not compromise opportunities for more conventional forms of self-contained housing to be delivered on larger sites, and to prevent against speculative development which does not adequately respond to local need.

7.99 It is imperative that large-scale shared accommodation is appropriately designed and managed, so to meet the specific housing need it is intended for. This includes provision of high quality living spaces that comply with the Local Plan requirements, including Policies QD 2

(Inclusive and safe design) and QD 8 (Residential design and density), meet Environmental Health and Fire Safety standards, and make adequate provision of communal space and facilities. In addition, all proposals must be accompanied by a management plan covering matters such as site management and maintenance, communal facilities, safety and security for occupants, and mitigation of potential noise or other nuisance.

7.100 Where proposals are acceptable in principle, we will require that minimum tenancy lengths are available to occupants. This is necessary to ensure that the development meets a specified need and is retained as shared accommodation over its lifetime. We will seek to prevent against future material changes of use where development effectively reverts to other forms of specialist accommodation, such as large scale hostels, which are not considered appropriate in the Borough.

7.101 Given their nature and scale, proposals for large-scale purpose built accommodation will be expected to contribute to the delivery of affordable housing, in line with the draft London Plan. However, because development is not in the C3 Use Class and does not meet minimum space standards for conventional housing, and generally consists of bedrooms rather than housing units, it is not considered as a suitable form of affordable housing in itself. Off-site planning contributions will be required, to be secured on a case-by-case basis having regard to viability, in accordance with the level of contributions sought by the London Plan.

HO10 Self-build and custom-build housing

- A The Council will seek to identify sites to help meet identified need for, and facilitate development of, self-build and custom-build housing particularly where this will improve access to affordable housing for local residents.
- B Development proposals for self-build or custom-build housing will be supported where a local need for this type of provision is clearly established and they:
 - a. Make the optimal use of land for residential development in contributing to the delivery of the Borough's strategic housing target, with a density level that is appropriate to the site having regard to Policy QD 8 (Residential design and density);
 - b. Make provision for affordable housing in line with Policy HO 3 (Genuinely affordable housing);
 - c. Are appropriately located, designed to a high quality standard (including sustainable design principles), integrate adequate amenity space and make a positive contribution to the neighbourhood in which they are situated, consistent with other Local Plan policies.
- C Proposals for self-build or custom-build housing should demonstrate how the design-led approach has informed the development, and clearly identify whether there are any elements of that may be change or become adapted owing to the unique nature of the design and construction process.

Explanation

- 7.102 Self-build and custom-build housing is housing that is built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than other options available, such as 'built for sale' market housing. Self-build generally refers to people who apply their own skills in the design and construction process, whereas custom-build involves the outsourcing of industry professionals, often for bespoke or innovate schemes. Self-build and custom build housing units provide an additional source of supply of conventional housing and a further housing choice, and will therefore be considered as housing in the C3 Use Class for policy implementation.
- 7.103 The Council has a statutory duty to maintain a register for self-build and custom-build housing and have regard to this register in its planning, housing and related functions. The register forms part of the evidence base informing Local Plan preparation. It provides an indication of demand for serviced plots for self-build and custom-build housing from individuals or groups who meet specific eligibility considerations. The Lewisham SHMA (2019) has also considered demand for this type of provision. This research indicates that whilst there is some interest locally it comprises a small proportion of Lewisham's overall housing need. In addition, more than one-third of applicants on the local register have also expressed an interest in the Greater London Authority register, and it is therefore not clear whether demand is exclusively for Lewisham or elsewhere. Given the Borough's heavily urbanised inner-London context, where there is a limited (and often constrained) supply of land to meet the needs of a growing population, there will be few opportunities for people to acquire appropriately located sites to build their own homes. This is particularly given that all applicants on the local register have expressed a preference for plots located in 'town centres', where sites will need to be optimised through higher-density development, in line with the spatial strategy for the Borough. Local land values may also prohibit the viability of such development.
- 7.104 Nonetheless, the Council is broadly supportive of self-build and custom-build housing. For example, we have recently collaborated with a local community organisation, making available land to enable a new self-build development of 33 residential units in the Ladywell area, at a site known as Church Grove. The development is supported by an innovative Community Land Trust structure that will ensure the new homes are affordable in relation to local incomes over the long-term. This development demonstrates our commitment to seek to meet demand within the Borough, and we will continue to monitor Lewisham's register in line with the relevant statutory requirements.
- 7.105 Proposals for self-build and custom-build housing will be supported where they respond positively to the locality and support delivery of the spatial strategy for the Borough. All proposals must be designed to a high quality standard and make provision for an element of affordable housing, where appropriate. Given Lewisham's challenging future requirement for conventional housing it is imperative that all development, including self-build and custom build housing, optimises the use of sites including through densities that are appropriate to the site location.

HO11 Gypsy and traveller accommodation

- A The Council will continue to assess the accommodation needs of Lewisham's gypsy and traveller community. Where there is a demonstrated local need for this type of provision, it will be addressed through a future review of the Local Plan.
- B To meet the Borough's current identified need for gypsy and traveller accommodation, a new site is allocated in this Local Plan.
- C All proposals for gypsy and traveller accommodation, including the development of new sites and pitches, must meet the following requirements:
 - a. Suitable provision of basic amenities including for water, sewerage/drainage, energy and waste management;
 - b. Safe and reasonably convenient access to and from the main road network;
 - c. Acceptable arrangements for all vehicles likely to use the site, including emergency service vehicles (giving consideration to access, parking, turning and service requirements);
 - d. Reasonable access to local shops, services and community facilities having particular regard to education and health services;
 - e. The provision is well integrated into the locality with a satisfactory layout and standard of facilities, including pitches, hardstanding, amenity blocks, open space and play areas; and
 - f. Development must not result in unacceptable adverse impacts on the safety and amenity of site occupants and neighbouring properties.

Explanation

- 7.106 The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community.
- 7.107 Travellers are part of the diverse community in Lewisham. In line with the National Planning Policy for Traveller Sites, the Council has undertaken an assessment to understand requirements of Lewisham's gypsy and traveller population. The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for 6 pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation.
- 7.108 Having regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies. A Preferred Site Consultation Report was published for a Regulation 18 stage consultation. This ran for a six-week period from 10th September 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed. The Council will now proceed with making provision for a dedicated gypsy and traveller site by way of a site allocation in this Local Plan (i.e. Poole Court). The single Issue Gypsy and Traveller Site Local Plan has therefore been withdrawn from the Council's Local Development Scheme.
- 7.109 The Council is committed to ensuring suitable provision is made to meet identified need for gypsy and traveller accommodation. Development proposals for new sites, pitches and/or plots will be assessed against the windfall development policy criteria set out in HO 11.B above. The policy will also apply to any future proposals to address any identified additional need arising over the plan period that cannot be accommodated within adopted site allocations, and in advance of a Local Plan review.

