

WANDSWORTH

Residential Conversion Policy and Meeting the Small Sites Housing Target Topic Paper

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Residential Conversion Policy and Meeting the Small Sites Housing Target

Wandsworth Local Plan Policies LP7, LP25 and LP26

Introduction

The Wandsworth Local Plan underwent Regulation 19 stage consultation between January and March 2022, and sets out a vision for Wandsworth Borough up to 2038. The new Plan will replace the current plan, largely adopted in 2016, and will update planning policies in the context of a new London Plan (2021), growing concern about climate change and the impacts of, and continuing response to, a global pandemic which has rapidly altered the way we perceive and conduct our everyday lives.

Housing continues to be a key issue for the borough, and the London Plan sets out a requirement to provide 1,950 homes per year to 2028/29, and 20,311 homes over the plan period. This includes an allowance of 414 homes to be provided on small sites (up to 0.25ha), a new requirement set out in the published London Plan at Policy H2.

In accordance with the NPPF, it is essential that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence that provides justification for policies. This report forms part of the evidence base. It supports the Council's approach for meeting the small sites target – the strategy for which is set out in Local Plan Policy LP7 – and the relationship between it and the desire to maintain family housing within the borough as part of a balanced approach to housing supply, availability and provision. This has overlaps with the approach taken in aiming to protect the existing housing stock expressed in policies LP25 (Protecting the Existing Housing Stock) and LP26 (Residential Conversions), which also seek to protect family-sized housing.

This report seeks to demonstrate that the small sites target can be met even if some potential small sites are restricted or protected for other purposes. Policies LP7, LP25 and LP26 are set out at Appendix One.

In the case of Policy LP26, the general approach is carried forward from the adopted plan which includes, within policy DMH2 (Conversions), a threshold of 150sqm above and below which differing approaches are taken to proposals for residential conversion, each with a different approach to securing or maintaining family-sized housing. Policy LP26 has reduced the threshold from 150sqm to 130sqm.

This report addresses three main issues:

1. The threshold at which Policy LP26 deals with residential conversions;
2. Ensuring that the small sites target can be met, through completions and pipeline data;
3. Demonstrating that an approach that may restrict residential conversions and small site redevelopment does not undermine or compromise meeting the small sites target.

Background

Wandsworth's focus on conversions

In order to protect family-sized dwellings from conversion, the Council has had a long-standing policy approach of protecting houses, family-sized flats and maisonettes.

Prior to the adoption of the current Local Plan (2016), properties below 120sqm were protected from conversion into smaller dwellings. This was updated for the adopted Local Plan – at Policy DMH2 – by raising the size threshold for conversion of all dwellings from 120sqm to 150sqm. The

change was supported by an analysis of residential conversions in 2008, which estimated that 69% of houses in the borough's existing stock are above 120sqm in size, including 44% between 120sqm and 149sqm, and 25% over 150sqm. It found that the proportion of existing flats and maisonettes over 120sqm was limited, 91% of which are below 120sqm.

Raising the size threshold for conversion from 120sqm to 150sqm has had a significant impact on the level of protection afforded to family sized dwellings, in particular those suitable for use by families with children. The protection of smaller dwellings also contributes to the provision of a greater choice of dwelling sizes and prices. Small houses and larger flats, in addition to maisonettes, can also provide for the needs of professional sharers, families, and for people who work from home.

A shift to small site targets

Residential conversions have long been counted as part of the housing supply and contribute to the overall housing requirement. They are, because of their scale, a relatively minor part of that supply. However, the recent review of the London Plan has placed a greater emphasis on the contribution of small sites – of which conversions play a part – and now treats small sites as a specific component of overall supply. It reflects a broader shift at the national scale around the contribution to housing supply of smaller sites.

The adopted Local Plan does not have a specific policy addressing small sites given that the 2015 London Plan did not require boroughs to deliver a specific number of units on small sites. There was also less emphasis on this type of development in the past.

Within the National Planning Policy Framework, paragraph 60 emphasises that, '*a sufficient amount and variety of land can come forward where it is needed*'. Paragraph 69 requires local authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. It goes on to state that Local Planning Authorities should, '*support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*'.

The Published London Plan 2021

Echoing this, the London Plan promotes development on small sites. **Policy H2 (Small Sites)** seeks to increase the role of small sites in the delivery of housing. Small sites are defined in the London Plan as those which are smaller than 0.25 hectares in size.

Part A of the policy addresses the ways through which small sites can deliver more housing, stating that boroughs should:

- pro-actively support well-designed new homes on small sites in order to significantly increase their contribution to meeting London's housing needs;
- diversify the sources, locations, type and mix of housing supply, and,
- support small and medium-sized house builders and those wishing to bring forward custom, self-build and community led housing.

Part B obliges boroughs to:

- recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites;
- prepare, where appropriate, site-specific briefs, masterplans and housing design codes for small sites;
- identify and allocate appropriate small sites for residential development;

- list these small sites on their brownfield registers; and
- grant permission in principle on specific sites or prepare local development orders.

The London Plan sets out a small-site housing completion target for all boroughs from 2019/20 to 2028/29, and in Wandsworth the target is 4,140 dwellings (or 414 additional dwellings per annum).

The borough-level housing targets are based on the evidence of housing capacity in the Mayor's London-wide Strategic Housing Land Availability Assessment (SHLAA) 2017. The small sites element was calculated through a combination of two methods - a modelled figure to estimate potential housing capacity from the densification of existing housing stock, and a windfall figure based on past trends.

The GLA produced a model to estimate densification from infill development, residential conversions and extensions. This was applied to existing housing within certain locations: those with a PTAL rating of 3-6¹, or within 800m of a tube station, rail station or town centre boundary. Following the outcome of the Draft London Plan examination, the model assumes that 0.3% of existing houses in these areas will be densified each year. The model assumes a 'densification factor' of 2.2 for detached and semi-detached houses and 1.3 for terraced housing. Different assumptions are used for conservation areas.

For other locations, and for other types of small site development, a windfall figure was used. This was based on annual trends of completions on sites under 0.25ha between 2008/09 and 2015/16. It included change of use (but not office-to-residential permitted development) and new build schemes with more than 10 units. It excluded residential conversions and new build developments smaller than 10 units to avoid double counting.

The emerging Wandsworth Local Plan

As a direct response to Policy H2 of the London Plan, Wandsworth's emerging plan sets out an approach to the development of small sites at Policy LP7. This policy supports the development of sites under 0.25ha, particularly in locations where access to public transport is good and subject to certain design and amenity standards guided by the Urban Design Study (2021). Small sites, in the context of the policy, include new build, densification, conversions / deconversions, changes of use and extensions, but excludes private residential gardens. The policy contains a specific clause that supports the redevelopment of existing residential properties when the original dwelling has a floorspace of more than 130sqm, or where an uplift in the number of family-sized dwellings is proposed.

Policy LP7 works alongside Policies LP25 (Protecting the Existing Housing Stock) and LP26 (Residential Conversions). Policy LP25 seeks to protect existing self-contained housing, in accordance with Policy H8 of the London Plan which allows for the loss of housing where it is replaced by new housing at existing or higher densities. Exceptionally, Policy LP25 allows for the loss of no more than two self-contained non-family sized units where it creates one family sized dwelling of less than 130sqm. Policy LP26 ensures that dwellings of 130sqm or less cannot be converted into flats unless the existing dwelling is unsuitable for families, and that the conversion of dwellings of more than 130sqm create at least one family sized dwelling, and no more than one studio. These policies help to support the existing stock of housing, and particularly larger family units.

The Local Housing Needs Assessment (LHNA)

¹ Public Transport Access Level (PTAL) is a means of assessing the access level of geographical areas to public transport. It hinges on the distance from any point to the nearest public transport stop, and service frequency at those stops. Broadly, the result is a grade from 1-6, where a PTAL of 1 indicates poor access to the location by public transport, and a PTAL of 6 indicates excellent access by public transport.

A key piece of evidence in the production of the Wandsworth Local Plan is the Local Housing Needs Assessment. The latest report was produced in December 2020, and it forms the backbone of the housing policies developed in the plan.

The Assessment identifies a mix of new market housing provision by dwelling size and tenure type for the borough by 2037. This has been calculated on the basis of evidence on recent household formation, in-migration, out-migration and projected household dissolution. Table 1 sets out these requirements, which will guide the mix of housing sought across Wandsworth and provide a basis for determining the mix of homes on individual sites (and is reflected in the Local Plan at Policy LP24, Housing Mix).

	Studio	1-Bed	2-Bed	3-Bed	4+ Bed
Market	0-5%	30-40%	30-40%	15-25%	5-10%
Affordable home ownership	0%	35-40%	40-45%	15-20%	5-10%
Affordable housing (rented)	0%	40-45%	30-35%	20-25%	5-10%

Table 1: Recommended mix of houses, Local Housing Needs Assessment (2020)

The analysis in the report identifies that almost three-quarters of the dwellings completed in the borough since 2013 have been one and two bedroom homes, suggesting that the market is responding to the need generated by young people, couples and those with a lower household income.

Data on housing completions between 2016/17 and 2020/21 shows that Wandsworth leans towards an undersupply of three- and four-bedroom dwellings, and oversupply of one- and two- bedroom homes. Indeed, the supply of 1 and 2-bed dwellings may be increasing.

	Studio	1-bed	2-bed	3-bed	4-bed	5+ bed
Proposed	216	2347	4367	1271	194	9
Proposed as a percentage	3%	28%	52%	15%	2%	0%

Table 2: Housing completions by number of bedrooms, Housing Trajectory

Demographic trends towards growing numbers of older people and increases in economically active people suggests that this is where the need is, and houses of 1- and 2-bedrooms are also the stated preference of those on the Housing Register². It provides a basis for housing policies and allocations across the Area Strategies and a justification for the individual policies of the plan³.

The Assessment also relates housing need to future housing provision, and estimates that around 81% in the known 'pipeline' of granted planning permissions would deliver 2 bed-units or fewer. The

² Para 10.54 of the Local Housing Needs Assessment states that, 'The Housing Register data provided by the Council suggested that as of 1st April 2019, there was the following need (this only includes those households highlighted as being in the "general needs queue"): 1-bed: 45%, 2-bed: 28%, 3-bed: 19%, 4+-bed: 8%.

³ It should be noted, however, that the LHNA has considered past provision, housing needs and pipeline, and an oversupply of 1- and 2-bed housing exists. The proposed housing mix seeks to address this and recognise the benefits of ensuring a supply of larger houses (e.g. in allowing movement in the market and freeing up smaller properties).

data from Wandsworth's planning permission database would tend to bear this out; the last three years for future housing provision in Wandsworth were calculated based on the number of bedrooms per dwelling to determine whether future provision will meet housing need.

Tenure	Studio	1 bed	2 bed	3 bed	4 bed	5+ bed	Not Known	Total
Market	650	2,529	4,510	1,708	164	185	2,116	11,862
	5%	21%	38%	14%	1%	2%	18%	100%
Intermediate	7	823	966	239	49	0	258	2,342
	0%	35%	41%	10%	2%	0%	11%	100%
Social/Affordable Rent	-134	194	157	183	35	6	516	957
	-14%	20%	16%	19%	4%	1%	54%	100%
Total	523	3,546	5,633	2,130	248	191	2,890	15,161
	3%	23%	37%	14%	2%	1%	19%	100%

Table 3: Net new build units with planning permission by unit size and tenure

Based on Table 3 above, future known housing provision in Wandsworth will overwhelmingly favour smaller units, with approximately 23% of units containing 1 bedroom and 37% containing two bedrooms. A further 14% of units will contain three bedrooms and the remaining 3% will contain 4+ bedrooms. The majority of these units will be provided through new builds. A large proportion (19%) is not known, but this is unlikely to alter the expected trend.

Recognising the proportion of new housing coming forward at the smaller sizes, and the opportunity for conversion of large houses to smaller flats and apartments, the LHNA supports the retention of the residential conversions policy to enable a mix of housing to be provided and available within the borough. It also supports the conversion of the very largest homes – where there is limited demand – into smaller units where family sized units can also be provided.

Definitions

The implementation of these policies relies on the definitions of some terms being better understood. Some of these definitions are included in the emerging plan's glossary.

The **threshold size reference** in all three policies of 130sqm is 'as originally constructed'. This refers to the floor area of the property prior to any extensions being carried out. Extensions carried out pre-1948 can be included in the original floor area. Parts of the dwelling that were not originally habitable rooms (for example lofts and cellars) would not be included for the purposes of calculating original floor area. The calculation excludes the area of outside walls but includes inside walls, partitions, cupboards and chimney breasts. Only the floor space of rooms with an existing headroom exceeding 2 metres in height is counted.

The threshold tallies with similar definitions in other boroughs and is better aligned with Table 3.1 in the Published London Plan, which sets out minimum internal space standards for dwellings. A 130sqm dwelling can be converted into a 74sqm 3-bed and 50sqm 1-bed. Therefore, broadly speaking, 130sqm is also the minimum floorspace to deliver a family-sized units (required by the adopted and emerging policy) and an addition non-studio unit.

A **family-sized dwelling** is a housing unit with three or more bedrooms. The London Plan defines family housing as being of a size, layout and design that is suitable for a family to live in and generally has three or more bedrooms. Using the London Plan definition also helps in justifying both a higher threshold and in negotiating a higher number of larger units on new-build schemes.

Self-contained means a building, or part of a building, which has been constructed or adapted for use as separate living accommodation.

The Local Plan implies that '**suitability for families**' is a judgement made on a case by case basis. Location will be taken into account in determining whether a property is suitable for families. For example, properties above shops or offices, in town centres or along busy main roads may not be suitable for families and therefore the principle of conversion is likely to be acceptable.

Issue 1: The threshold at which Policy LP26 deals with residential conversions

The adopted Local Plan has an existing policy (DMH2) covering residential conversions, which resists the conversion of dwellings below 150sqm, and ensures that conversions of dwellings above 150sqm provide at least one family-sized unit.

The policy is to be rolled forward into the emerging plan, and the threshold needs to be revisited and justified in the current legislative context.

As an inner London borough, Wandsworth has a high proportion of 19th and 20th Century buildings, which inevitably includes a wide range of housing stock. As well as seeing older institutions – such as health buildings and places of work – falling out of use and being converted to homes, larger houses that are perhaps less suited to modern living or would be well above average housing prices are being converted to flats to also add to the housing stock.

Wandsworth does, however, have some very desirable and attractive neighbourhoods where family housing is part of the character. The policy of the Council has long been to achieve an appropriate housing mix which caters for a wide range of people. The pipeline of new housing development favours smaller units (see Table 3 above), and the incremental loss of larger houses to flats could further reduce the overall stock of larger family homes further, limiting the housing choice for families and potentially increasing their price within the borough as a result of a narrower supply.

The adopted Core Strategy identifies this issue at Policy IS5, and signposts policies in the Development Management Policies Document which aim to protect the stock of family-sized homes from conversion. Within the DMPD, Policy DMH2 seeks to avoid the net loss of residential units through conversions by defining a threshold of 150sqm, below which it has to be unsuitable for families and above which it is required to create at least one family-sized unit. Policy DMH1 seeks to avoid the loss of residential units at all, unless this can include creating family-sized units from two or more non-family-sized units.

Whilst the retention and protection of family-sized housing is a core objective of the Conversions policy, the impacts of residential conversions can also have detrimental impacts on local character and potentially lead to:

- Loss of single family dwellings;
- Loss of front gardens or reduction in garden space;
- On-street parking implications;
- Amenity impacts, including increased noise and activity, overlooking/privacy;
- Poor standard of accommodation;
- Impact on local character such as external alterations for waste and parking;
- More transient, less stable neighbourhoods with a reduced sense of community responsibility and ownership.

History of the 150sqm

Prior to 2016, the borough had adopted policies in its UDP (notably H5 and H6) which sought to ensure that new housing was of a suitable size and standard, and resisted developments involving housing with a floorspace of less than 120sqm. This policy held up to scrutiny and, between 2004 and 2007, 93% of approved house to flat conversions were in properties above the 120sqm threshold. However, a report prepared in 2008 estimated – using several data sources – that the majority of houses in the borough (69%) were above the 120sqm threshold, and were not protected from conversion by it. At the same time, the plan also had ‘housing conversion restraint areas’,

which also provided an additional measure to resist conversions and protect larger dwellings⁴, and within which only 9% of all conversion applications were granted.

The 2008 report assessed the data by separating houses into three categories – those up to 120sqm, those between 120 and 149sqm and those above 150sqm – and found that 44% were in the middle category and 25% in the latter (so 69% of all houses were above the conversion threshold). The adopted plan includes Policy DMH2 which incorporates the raised 150sqm threshold (prior to any extensions carried out since the end of 2008) and removed the housing conversion restraint areas.

The number of planning application approvals for conversions has dropped in the period 2009 to 2020 (1,149 over 11 years against 564 approvals between April 2004 and November 2007), but has remained relatively steady in that period, averaging 105 approvals per year.

In undertaking a review of the Local Plan, the Regulation 18 Consultation Version (November 2020) maintained the 150sqm threshold on the basis that the previous work continued to justify this position. However, this did receive comments during the engagement period, notably from the Mayor, who commented that the 150sqm threshold was, *'excessive in light of the fact that the minimum space standard set out in Table 3.1 of the PLP for a six bedroom, eight-person dwelling is 138sqm'*. This standard is set out at Policy H6 of the published London Plan (Housing Quality and Standards), which seeks to ensure that housing development should be of a high quality and design and provide adequately sized rooms.

Changes in the Regulation 19 Plan

In the light of the Mayor's comments, and a review of similar policies across other London boroughs, the Council has amended its approach for the Regulation 19 Plan. The Council considers that, in the light of completions and pipeline data, there remains a need to ensure that existing family homes are protected to ensure a continuing balance of housing choices in the borough.

The Mayor comments that larger family housing can be delivered below the 150sqm mark – though having a standard to define this is no guarantee of delivering them. The Council's response to this is to lower the threshold in the Regulation 19 plan to **130sqm as originally constructed**⁵, thereby acknowledging the London Plan standard whilst also continuing to protect a majority of the larger family houses already in the borough.

This lower threshold has also been introduced into Policy LP7 (and LP25) and ensures that applicants are unable to circumvent the conversions policy through the (partial) demolition of an existing family home (which is possible under the adopted plan).

It is not thought that the reduction in the threshold would result in substantially more dwellings being eligible for conversions because there are many dwellings with pre-2008 extensions which inflate their original floorspace. This would not be the case with the new threshold, as the calculation would not include any extensions. The 2008 study did account for extensions to properties in its assessment and would have over-estimated the original size of many dwellings.

The 130sqm policy for conversions, whilst acknowledging the need to deliver on small sites, also has commonalities with recent work in other London boroughs, including:

⁴ The House Conversion Restraint Areas were predominantly located south and east of Clapham Junction, around Tooting Bec and west of Wandsworth Town to Putney.

⁵ The previous standard was **150sqm, prior to any extensions carried out since the end of 2008**

- Barnet’s policy HOU03 (Reg.19), which states that the conversion of larger homes in to smaller self-contained units will be possible where the original gross internal floor area exceeds 130sqm (and alongside other criteria). This has been set as the smallest floorspace allowance that could successfully incorporate two self-contained units.
- Brent’s policy BH11 (Reg.19), which will only allow the conversion of family sized housing where the existing home is 130sqm or more (including any potential to extend through permitted development rights).
- Islington’s policy H2 (Reg.19), which sets a threshold of 125sqm and above for the conversion of residential units to a larger number of self-contained flats, again to maintain a supply of larger family houses. Islington’s plan is currently at Examination, but no modifications have been sought for this threshold.
- Lambeth’s plan, which was adopted in September 2021, and contains a similar residential conversions policy to that proposed in Wandsworth, both resisting conversions of dwellings suitable for occupation by families under 130sqm as originally constructed, and ensuring that dwellings of more than 130sqm that are proposed to be converted include family-sized accommodation. This threshold is cited as both protecting family sized housing and avoiding the harmful cumulative impacts that can arise where numerous conversions occur in one street or neighbourhood.
- Lewisham’s policy HO2 (Reg.18) which, deals with the optimisation of small sites for housing use. Part E of this policy rules out the conversion of single family dwellings or self-contained units with 3+ bedrooms below 130sqm unless (amongst other factors) a family sized unit is reprovided. As with Wandsworth, Lewisham acknowledges the small sites target of the London Plan, and the source of housing that conversions can supply, but expresses concern about the loss of family-sized units and the dominance in the supply side of smaller units. The policy seeks to balance these competing challenges through the threshold applied.
- Southwark’s plan, which was recommended for approval by its Cabinet in December 2021 and will be formally adopted following a meeting of its Full Council in February 2022. Similar to other boroughs, it has – at policy P3 – a threshold of 130sqm below which the conversion of a single dwelling into two or more homes will not be permitted. This is also justified on the basis of protecting existing family homes.

Future housing provision

In order to relate housing need to future housing provision, known ‘pipeline’ planning permissions granted within the last three years for future housing provision in Wandsworth have been calculated based on the number of bedrooms per dwelling to determine whether future provision will meet housing need.

Based on Table 3 above, future known housing provision in Wandsworth will overwhelmingly favour smaller units.

This indicates that there is a shortfall in future housing provision of three-bedroom dwellings (alongside an under-provision of houses with 4+ bedrooms) and a potential oversupply of one bed units. On this basis, there remains a need for the emerging Local Plan to continue to ensure that future housing needs in Wandsworth are met by providing the right mix of unit types and sizes. This points towards a continuing requirement for policies within the plan that both protect the existing residential stock, and have a balanced approach to resisting residential conversions where it would

otherwise undermine the existing quantum of family housing within the borough. In taking this position, it is a logical step to extend the use of the threshold into LP7 and LP25 to ensure that this balance is consistent in the plan.

The conversions threshold at appeal

Whilst the threshold for conversions has been reduced for the Regulation 19 plan, the higher / previous threshold has been used successfully at appeal for many years.

This section analyses the outcome of planning appeals against the Council's conversion application refusals, determined by the Planning Inspectorate between April 2017 and March 2020, including an overview of the key reasons given by the Inspectorate.

	Allowed		Dismissed	
	Number	%	Number	%
2017-2018	2	50	2	50
2018-2019	0	0	4	100
2019-2020	0	0	8	100
2020-2021	1	50	1	50
Total	3	16.7	15	83.3

Table 4: Appeals involving policy DMH2 between 1st Apr 17 and 31st Mar 20.

Between 1 April 2017 and 31 March 2021, policy DMH2 was cited in 19 appeals, including 3 allowed and 16 dismissed appeals. Most of these appeals (84%) were therefore dismissed.

The large proportion of dismissed appeals demonstrates that the currently adopted policy has been standing up to closer scrutiny. The below table shows the majority of appeals were dismissed due to the loss of an existing family sized unit with a floorspace below 150sqm, which shows support for a policy approach which provides a degree of protection for family-sized dwellings.

	Relevant to 150m threshold?	Decision	Application No	Summary of justification
1	Yes	Dismissed	2017/1544	Agreed that proposal would result in the unacceptable conversion of an existing suitable family sized unit.
2	Yes	Dismissed	2019/1097	Agreed proposal would not provide adequate living conditions for future occupiers due to insufficient floor space and would result in the loss of a dwelling which could reasonably be considered suitable for families.
3	Yes	Dismissed	2017/3174	Agreed that the proposal would lead to a loss of a family dwelling and that this would cause significant harm to the composition of local housing stock.

4	Yes	Dismissed	2018/1859	<p>Agreed proposal would result in the loss of a dwelling suitable for family accommodation and does not include any cycle parking provision for the new residential units.</p> <p>Disagreed proposal would result in sub-standard level of accommodation for future occupiers</p>
5	Yes	Dismissed	2018/5248	Agreed proposal would have a significant adverse effect on the range of housing provision.
6	Yes	Dismissed	2017/3815	Agreed that proposal would reduce the choice of housing stock in the borough, cause harm to the character and appearance of the host building and the wider area, and would unacceptably harm the living conditions of adjacent and future occupiers.
7	Yes	Dismissed	2018/4920	<p>Agreed proposal would adversely affect the local housing stock and that the external space provision would be unsatisfactory.</p> <p>Disagreed that amount of internal floor space would result in unacceptable living conditions.</p> <p>Agreed proposal would cause harm to the amenity of neighbouring flats at 956 Garratt Lane, and to the proposed ground floor flat below.</p>
8	Yes	Dismissed	2017/6570	Agreed proposal would result in harm to the existing choice of housing stock and would fail to provide a satisfactory standard of accommodation for future occupiers
9	Yes	Dismissed	2018/4276	Agreed proposal would result in harm to the existing choice of housing stock within the borough, would have a significantly adverse impact on the character and appearance of the area and would fail to meet the internal space standards.
10	Yes	Dismissed	2019/0886	Agreed proposal would result in harm to the existing choice of housing stock, fails to satisfy the minimum space standards and does not provide access to a garden.
11	Yes	Allowed	2017/0203	Disagreed that dwelling has less than 150sqm habitable floor space, and concluded location is unsuited for a family house, meaning that

				<p>the proposal is not contrary to the intent of policy DMH2.</p> <p>Disagreed that proposal would be out of keeping and of detriment to the appearance and character of the host property and local spatial character.</p> <p>Disagreed that proposal would harm the outlook for neighbouring occupants.</p>
12	Yes	Allowed	2018/4663	Disagreed proposal would result in harm to the existing choice of housing stock. Proposal would still provide a family unit and the additional units would contribute to the Borough's housing supply and make efficient use of land.
13	No	Dismissed	2017/5578	<p>Disagreed proposal is contrary to policy DHM2 as the dwelling does not comprise family-sized accommodation.</p> <p>Agreed that the proposal does not meet the internal space standards for one bedroom two person dwellings (DMH6) and the resulting lack of amenity space would be harmful to the living conditions of prospective residents (DMH7).</p>

Table 5: Appeal analysis based on 150m threshold

Conclusion

The position taken in the Regulation 19 Local Plan strikes a balance between the need to protect family housing and to address the small sites target by allowing conversions of larger family houses. It is particularly important to monitor this in the current time, when the pipeline of housing anticipated within the borough is expected to over-provide smaller homes and under-provide on family sized homes, and the expectation is that the market will balance itself over the longer term as present needs are met.

The approach also recognises the internal space standards defined at Table 3.1 in the published London Plan and aims to balance this with what is known about the size of houses across the borough from the findings of the 2008 report.

Based on the recent adoption of similar thresholds in similar London boroughs facing similar challenges from competing objectives, the Regulation 19 stance in Wandsworth's plan is considered to be reasonable and measured.

The recent history at appeals suggests that a lower threshold can be supported where the Council refuses applications.

Issue 2: Ensuring that the small sites target can be met, through completions and pipeline data

The adopted London Plan contains a small site target for homes, which is a component of the overall target for new homes. In Wandsworth, the annual target for small sites is 414 dwellings. Wandsworth needs to demonstrate that there is a supply of small sites to meet this need over the plan period.

Below, the recent history of applications received and completed in Wandsworth is set out to establish the trend for small site development against the expected target defined in Policy H2 of the London Plan. As well as the overall number of units approved / completed on small sites, there is an analysis of the types of development completed on small sites. This analysis looks only at housing development on small sites which resulted in a net loss / gain in the number of dwellings.

For the purpose report, development types are defined as follows:

New Build

- Part-residential / non-residential buildings or land have been replaced with a new scheme that includes residential units.
- Residential garages have been replaced with a new scheme that includes residential units.

Residential Densification

- Schemes where one or more existing residential dwellings have been demolished, and replaced with a new scheme which provides an uplift in the number of dwellings.

Change of Use

- Schemes where existing non-residential buildings have changed to residential.

Conversions

- Conversion of single-family house(s) / flat(s) into multiple flats or HMO, which provides an uplift in the number of dwellings.

Extensions

- This includes units wholly contained within an extension (including additional storeys) to an existing building.

De-conversion

- Conversion of two or more single-family houses/flats into a single-family house / flat.
- Conversion of three or more single-family houses/flats into multiple single-family houses / flats, which provides a reduction in the number of dwellings.

Other

- Developments which do not match any of the above category.

Approvals

Table 6 (below) shows the number of net units approved in Wandsworth between 2009 and 2021 by the size of the site. It does not include units delivered under Prior Approval or Lawful Development Certificate. On average 711 units were approved each year on sites under 0.25ha, equating to 21.1% of all units approved.

In terms of the adopted local plan period (2016-2021), on average 677 units were approved each year on sites under 0.25ha, equating to 34.2% of all units approved.

Year	< 0.25ha			≥ 0.25ha			
	Planning Permission	Prior Approval or Lawful Development Certificate	Total	Planning Permission	Prior Approval or Lawful Development Certificate	Total	Grand Total
2009/10	313	0	313	1058	0	1058	1371
2010/11	547	1	548	2122	0	2122	2670
2011/12	588	5	593	9979	0	9979	10572
2012/13	477	9	486	4645	1	4646	5132
2013/14	583	281	864	1201	21	1222	2086
2014/15	613	447	1060	4140	99	4239	5299
2015/16	1137	146	1283	2124	1	2125	3408
2016/17	851	279	1130	1006	0	1006	2136
2017/18	551	122	673	386	73	459	1132
2018/19	494	103	597	1910	86	1996	2593
2019/20	368	60	428	643	0	643	1071
2020/21	481	77	558	2391	9	2400	2958
Grand Total	7003	1530	8533	31605	290	31895	40428

Table 6: Approvals 2009-2021 on sites of less than 0.25 ha (net additional conventional dwellings)

Although the number of net units approved in Wandsworth declined between 2015/2016 and 2019/2020, it has both risen again in 2020/2021 and exceeded the hypothetical small sites sub-target (414 units) each year. The 3-year moving average (Chart 1, below) shows that the number of small sites approvals comfortably exceeded the hypothetical small sites sub-target over any 3-year period between 2011/2012 and 2020/2021.

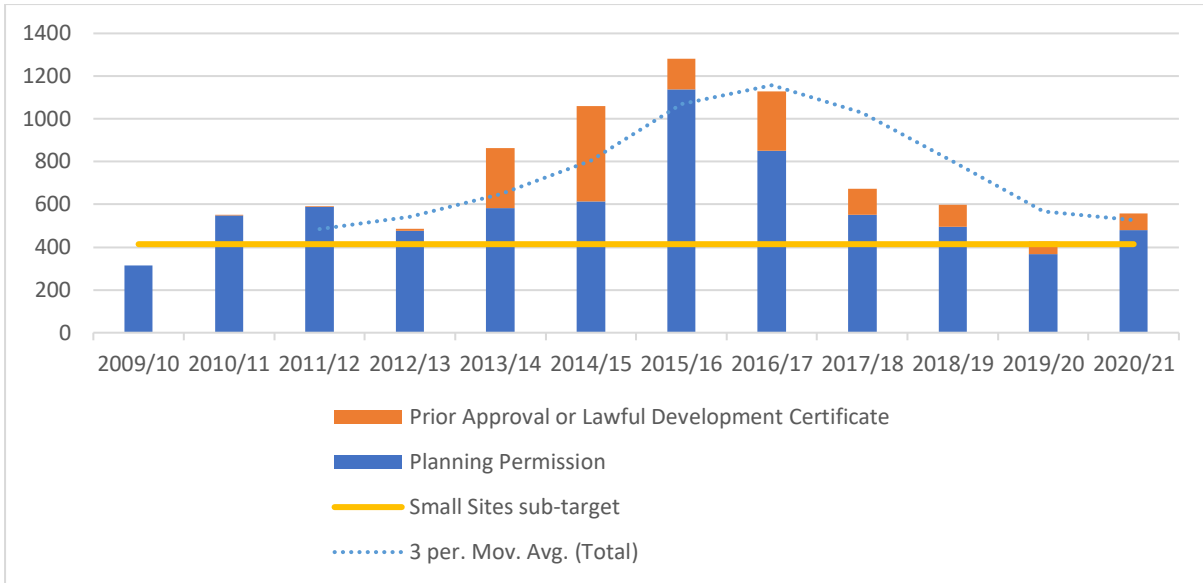


Chart 1: Approvals 2009-2021 on sites of less than 0.25 ha (net additional conventional dwellings)

On sites of less than 0.25ha, an average of 40% of net additional conventional dwellings approved were new build, 18% were through change of use and 13% through conversion of existing residential buildings. As the proportion of change of use schemes has dropped, similar proportions were now delivered through building on existing residential sites (11%) and extension (14%). The net position is different, as whilst new builds, densifications, changes of use and conversions tend to bring a significant net gain, extensions and deconversions – which are amongst the smallest contributors – bring small or negative net gains.

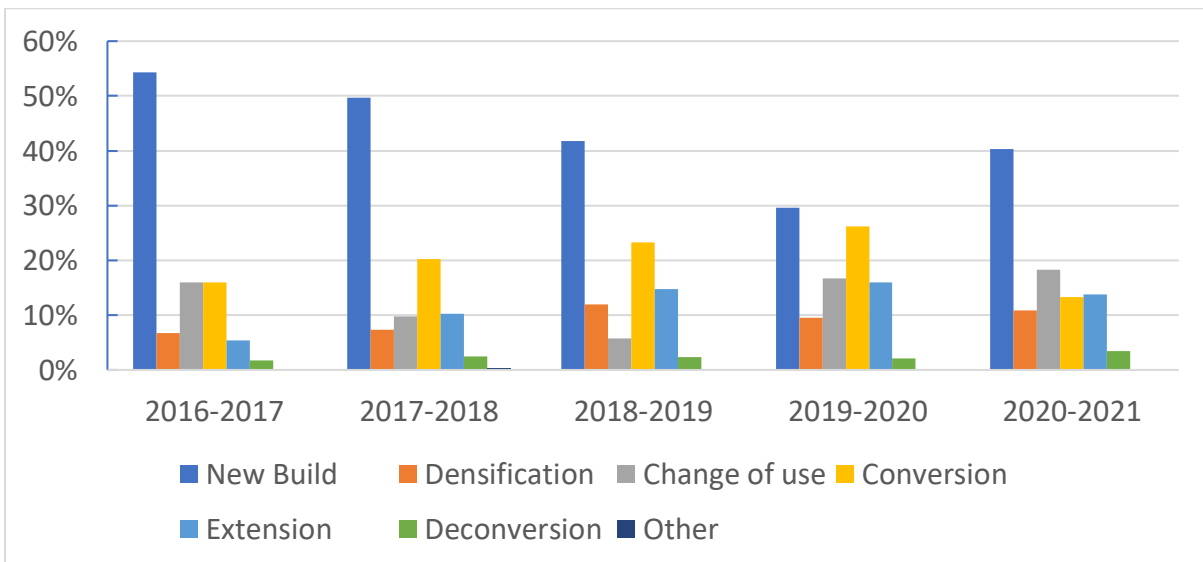


Chart 2: Approvals 2016-2021 on sites of less than 0.25 ha, by development type (percentage of all gross additional conventional dwellings delivered on sites of less than 0.25 ha)

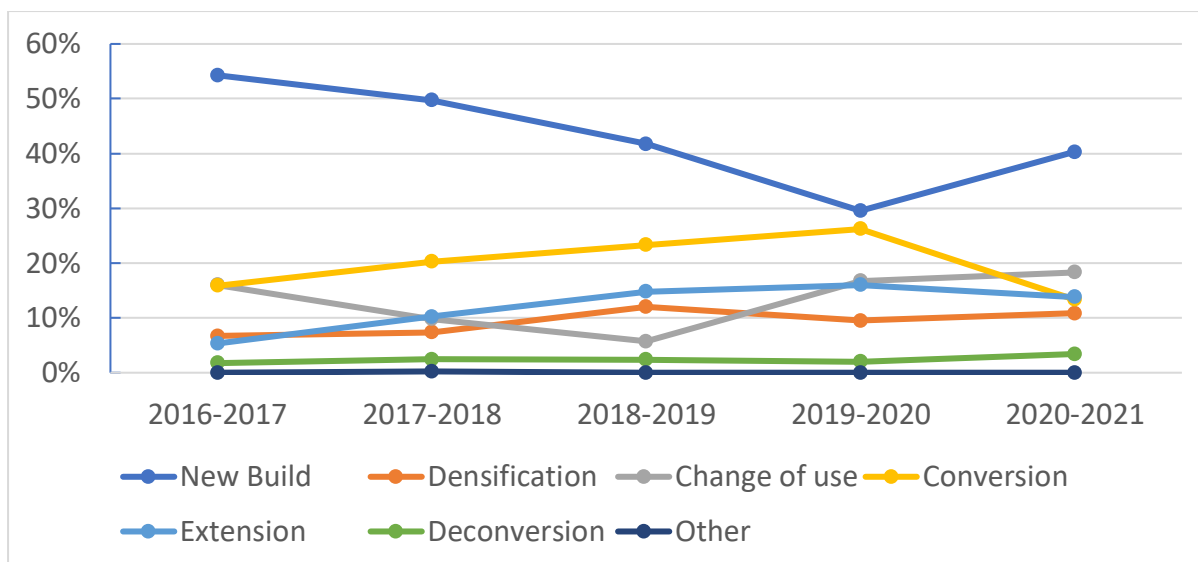


Chart 3: Approvals 2016-2021 on sites of less than 0.25 ha, by development type (percentage of all gross additional conventional dwellings delivered on sites of less than 0.25 ha)

Completions

Table 7 (below) shows the number of units completed in Wandsworth between 2009 and 2021 by the size of the site. On average 426 units were completed each year on sites under 0.25ha, equating to 28.9% of all units completed. However, this figure varies widely from year to year between 224 to 682 units by number (2011/12 and 2016/17), or 15.7% to 55.5% of all units completed (2015/16 and 2010/11).

In terms of the adopted local plan period (2016-2021), on average 518 units were completed each year on sites under 0.25ha, equating to 29.2% of all units completed. In this case, the figure also varies from year to year between 377 to 682 units.

It is clear that there are smaller variations among completions on small sites than on large sites. The relative standard deviation (which describes the spread of data with respect to the mean value) is 27% for completions on small sites, and 58% for completions on large sites. Although smaller in proportion, housing delivered on small sites constitutes a more resilient source of housing supply.

Year	< 0.25ha			≥ 0.25ha			Grand Total
	Planning Permission	Prior Approval or Lawful Development Certificate	Total	Planning Permission	Prior Approval or Lawful Development Certificate	Total	
2009/10	450	2	452	1100	0	1100	1552
2010/11	261	1	262	210	0	210	472
2011/12	219	5	224	754	0	754	978
2012/13	379	9	388	386	1	387	775
2013/14	291	23	314	897	0	897	1211

2014/15	374	50	424	516	0	516	940
2015/16	354	98	452	2424	2	2426	2878
2016/17	534	148	682	1567	22	1589	2271
2017/18	420	71	491	1535	1	1536	2027
2018/19	563	66	629	1202	0	1202	1831
2019/20	317	94	411	917	2	919	1330
2020/21	322	55	377	1021	1	1022	
Grand Total	4484	622	5106	12529	28	12558	17664

Table 7: Completions 2009-2021 on sites of morre and less than 0.25 ha (net additional conventional dwellings)

Chart 4 shows that the borough would generally be able to meet the small sites sub-target if it applied in the adopted plan period (2016-2021). Although, the number of net completions on small sites was below the requirement in 2019/2020 and 2020/21, the 3-year moving average performs well, exceeding the target between 2016/2017 and 2020/2021. The increase in the number of approvals in 2020/21 may result in a rise in completions for the year 2021/22, and this will be monitored when figures become available.

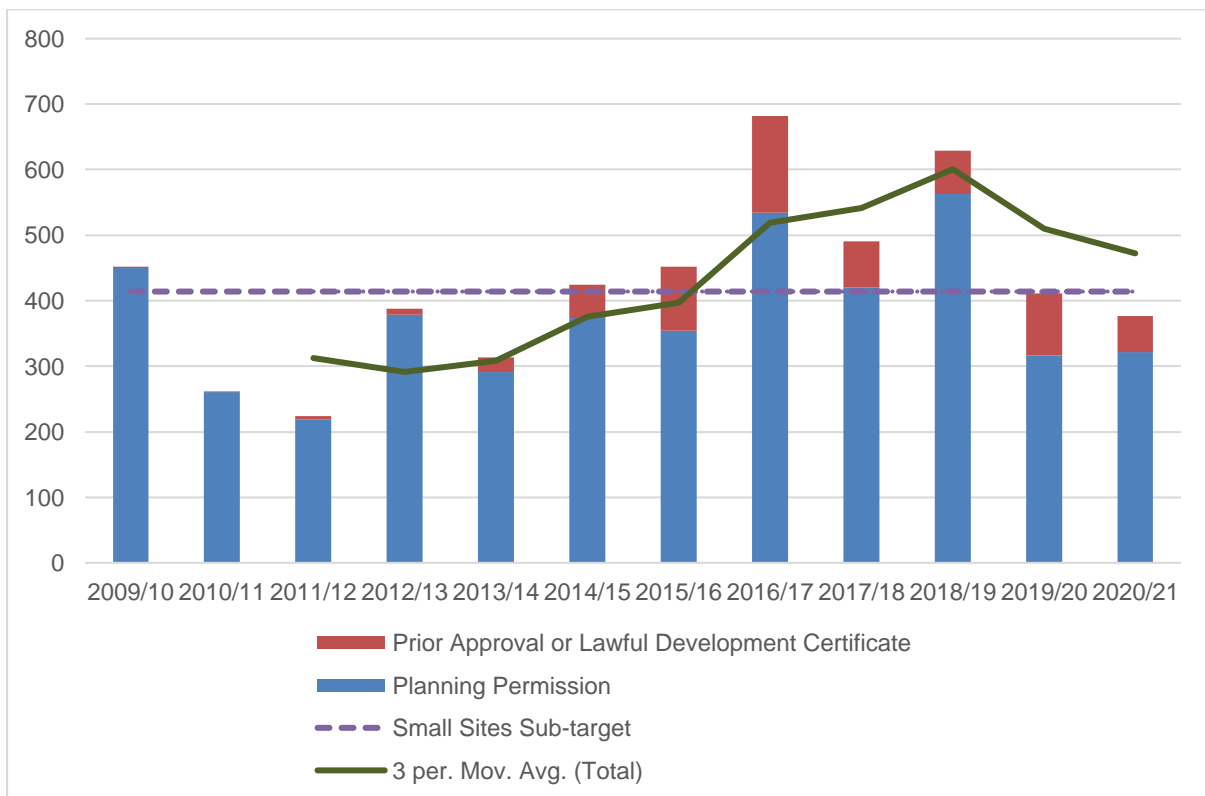


Chart 4: Completions 2009-2021 on sites of less than 0.25 ha (net additional conventional dwellings)

Chart 2 below sets out completions on small sites resulting in change to the number of residential units by the types of development. It does not include units delivered under Prior Approval or Lawful Development Certificate.

On sites of less than 0.25ha, an average of 57.4% of **net** additional conventional dwellings are delivered through new build, 14.2% through change of use and 16.2% through conversion of existing residential buildings. A smaller proportion were delivered through building on existing residential sites (5.6%) and extension (9.4%). Charts 2 and 3 shows that the **gross** proportions have remained relatively constant in the adopted plan period, 2016-2020 (note: deconversions provide a source of new dwellings, but usually result in a net reduction in units overall).

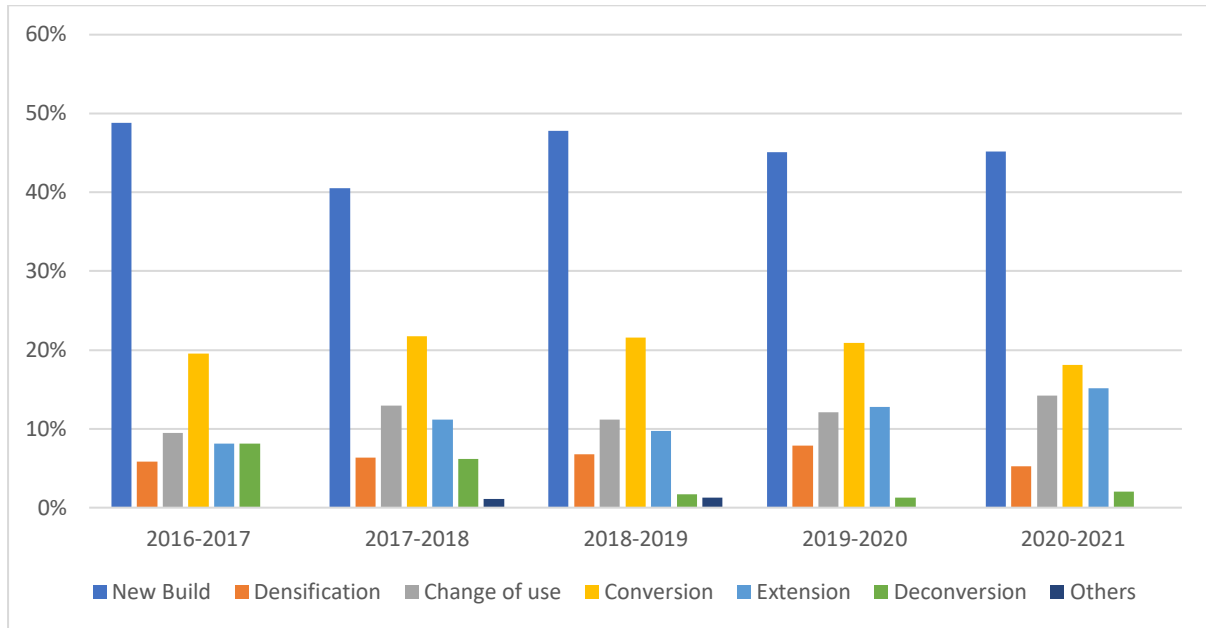


Chart 5: Completions 2016-2021 on sites of less than 0.25 ha, by development type (percentage of all gross additional conventional dwellings delivered on sites of less than 0.25 ha)

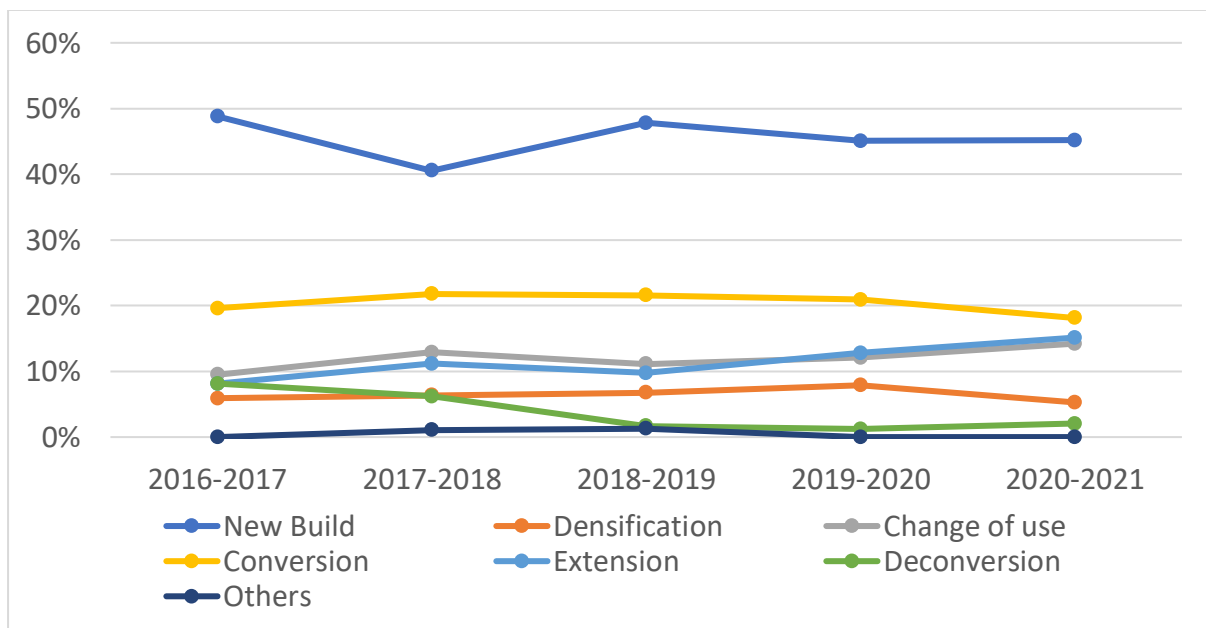


Chart 6: Completions 2016-2021 on sites of less than 0.25 ha, by development type (percentage of all gross additional conventional dwellings delivered on sites of less than 0.25 ha)

Conclusions

An assessment of the applications coming to Wandsworth in recent years suggests that there is a supply sufficient across a range of small site types – including residential conversions – that would be sufficient to meet the London Plan small sites target in the future. This has been achieved with the existing conversions threshold at 150sqm (how this will be affected by the lower threshold in the emerging plan will need to be monitored).

The number of approvals is well above the small sites target, and the rate at which they are completed is, on the basis of a rolling average, above the target. This has consistently been the case, though in recent years the year on year number has begun to fall, and has been marginally below the target. However, at this time, the rolling 3 year average remains above the target, and approvals have risen in 2020/2021. This does indicate that coming years will be crucial in monitoring this trend and considering the cause of any change, and any response that this may require to maintain progress. It may be helpful that approvals began to rise again in 2020/2021.

Note on the pandemic

It is possible that the global pandemic experienced between 2020 and 2022 may have affected the number of approval and completions in this period for a number of reasons, including shortages of workers and materials, financial uncertainty or changed priorities. These reasons are likely to have impacted both individuals and organisations. The coming years will need to be monitored carefully for any patterns, but whilst the economy continues to recover, it remains too early to draw conclusions about the impact of the pandemic on housing delivery or the robustness of the process that determines, and seeks to achieve, housing targets.

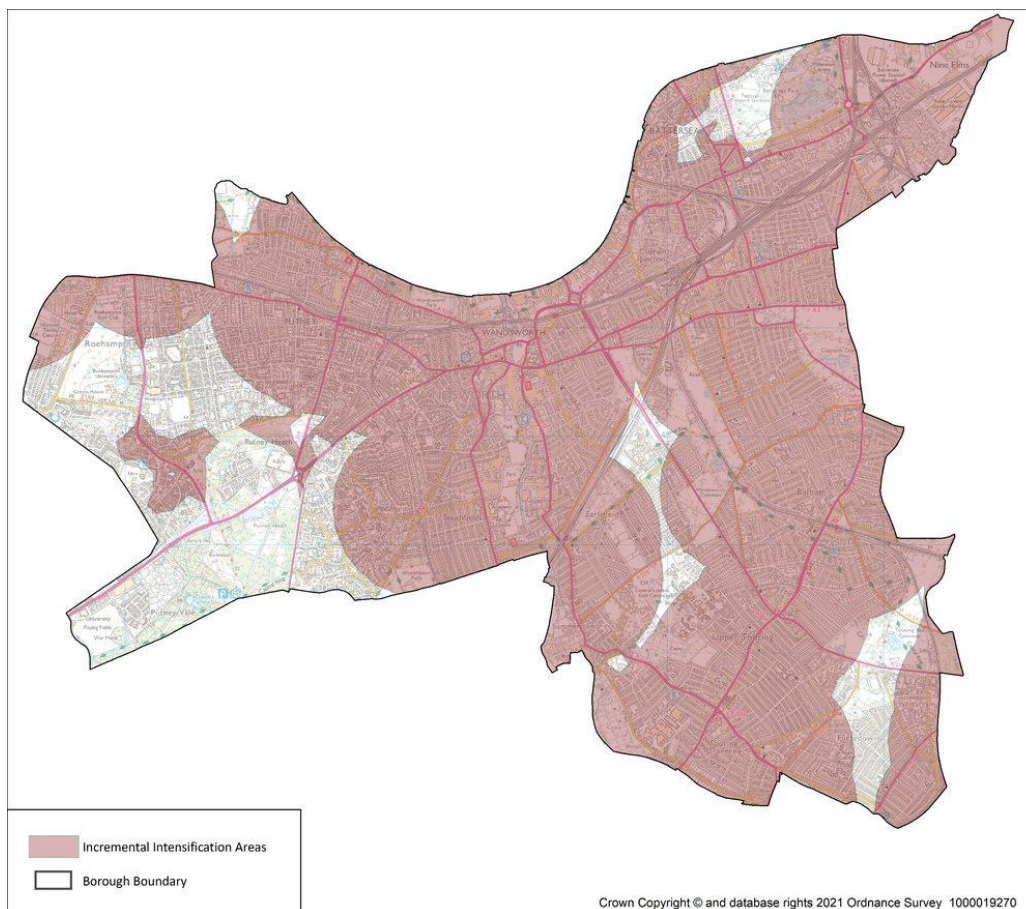
Issue 3: Demonstrating that an approach that may restrict residential conversions and small site redevelopment does not undermine or compromise meeting the small sites target.

In pursuing a threshold approach to residential conversions and small site redevelopment to protect family housing, some sources of small sites are potentially limited. Wandsworth needs to demonstrate that a balance can be met in pursuing the objective of maintaining larger homes and delivering on smaller sites through its policy approach.

London Plan Policy H2 (Small Sites) requires boroughs to proactively support well-designed new homes on small sites in order to significantly increase the contribution they make to meeting London’s housing needs. The small sites sub target set out in H2 is based on the assumption that housing delivery can be increased on small sites where they:

- fall within 800m of a town centre boundary or a rail or tube station, or
- have a PTAL rating of 3 or above.

As shown in the map below, the majority of Wandsworth falls within these areas. According to the GLA’s methodology, this means there is the potential to increase residential housing delivery on small sites across most of the borough. Exceptions include large areas of the west of the borough in Roehampton and between Putney town centre and Putney Heath, the far south east in Furzedown beyond Tooting town centre and the west side of Battersea Park. These, and other areas that fall outside this definition, are not specifically excluded from accommodating development on small sites; the estimate relies of sites coming forward in more sustainable locations.



The largest proportion of completions on small sites comes through new build schemes (see Chart 5, above), and this has been consistently over 40% over the past five years. Policy LP7 will continue to

support the development of new build schemes across the borough, subject to design and amenity considerations, and particularly in those more sustainable areas defined by the London Plan. Design considerations will be guided by the Urban Design Study, which contains detailed advice about the character of the borough's neighbourhoods. Whilst the supply of brownfield land is finite, it is expected that sites will continue to come forward and can be assessed within the existing policy framework; whilst LP7 acknowledges the small sites target for sites under 0.25, the adopted plan always sought to allow development of suitable sites within design and amenity considerations and it is right that this continues.

Conversions, densification and extensions provide other sources of small site completions, and their contribution now and moving forward are discussed below.

Wandsworth has considered various policy options in its emerging Local Plan, and particularly in response to comments received during the Regulation 18 consultation. These have included:

- Changing the approach to managing residential conversions and de-conversions;
- Changing the approach to managing redevelopment of existing dwellings (densification);
- Changing the approach to managing residential development on private garden land;
- Changing the approach to managing other types of residential development on small sites.

Each of these options is considered in turn below. For each option a conclusion is drawn and this is the position proposed in the Publication Wandsworth Local Plan.

Housing Delivery through Residential Conversions and De-conversions

The threshold for managing residential conversions is looked at in detail at Issue 1 above. The conclusion drawn from evidence regarding the size of the boroughs houses, the future pipeline of housing, comments made to the Regulation 18 plan regarding house size and the approach of other London boroughs suggests that a threshold remains a reasonable policy approach to help protect family housing, and the threshold has been reduced from 150sqm to 130sqm.

This section outlines data on residential conversions and de-conversions in Wandsworth since 2009. The analysis looks at approvals first, then completions. During this period, the threshold has operated at 120sqm prior to 2016, and at 150sqm after 2016.

Financial year	Conversions			De-conversions			Total net additional units
	Existing units	New units	Net change in units	Existing units	New units	Net change in units	
2009/10	76	195	119	79	34	-45	74
2010/11	68	168	100	106	47	-59	41
2011/12	64	186	122	90	42	-48	74
2012/13	28	81	53	75	36	-39	14
2013/14	40	116	76	106	55	-51	25
2014/15	43	97	54	57	31	-26	28

2015/16	92	191	99	70	34	-36	63
2016/17	87	197	110	83	53	-30	80
2017/18	104	218	114	56	41	-15	99
2018/19	77	161	84	41	21	-20	64
2019/20	72	145	73	53	25	-28	45
Total	751	1755	1004	816	419	-397	607

Table 8: Residential Conversions and De-conversions 2009 - 2020 (approvals)

Table 8 shows some relative consistency in the approvals of conversions and de-conversions over the study period, with a notable reduction in de-conversions over recent years, which may reflect the change to the threshold in 2016. On average, the average annual addition to the housing stock from conversions, allowing for de-conversions, is 55 units. This accounts for 13.2% of the small sites target.

Table 9 below sets out the number of units completed each year through residential conversions on sites under 0.25 hectares in size. It also includes the number lost through de-conversions, where previously subdivided dwellings are converted back to their original state. In total there was a net gain of 830 units through conversions over the 11 years, and a net loss of 315 units through de-conversions.

In terms of the period since the Local Plan was adopted (2016-2020), there was a net gain of 279 units through conversions, and a net loss of 66 units through de-conversions. This equates to an annual average of 70 units created through conversions and 17 units lost through deconversions. A high proportion of approvals appear to be translating into completed schemes.

Financial year	Conversions			De-conversions			Total net additional units
	Existing units	New units	Net change in units	Existing units	New units	Net change in units	
2009/10	89	213	124	90	48	-42	82
2010/11	63	160	97	101	51	-50	47
2011/12	44	127	83	66	28	-38	45
2012/13	53	152	99	67	32	-35	64
2013/14	30	81	51	59	29	-30	21
2014/15	25	72	47	51	29	-22	25
2015/16	41	91	50	60	28	-32	18
2016/17	49	125	76	31	17	-14	62
2017/18	60	130	70	84	49	-35	35

2018/19	69	161	92	32	15	-17	75
2019/20	40	81	41	14	14	0	41
Total	563	1393	830	655	340	-315	515

Table 9: Residential Conversions and De-conversions 2009 - 2020 (completions)

As would be expected, the majority of units created through residential conversions have up to two bedrooms (76% of all completed units). Similarly, de-conversions predominantly result in larger units with three or four bedrooms (73% of all units completed). This is shown in charts 7 and 8 below.

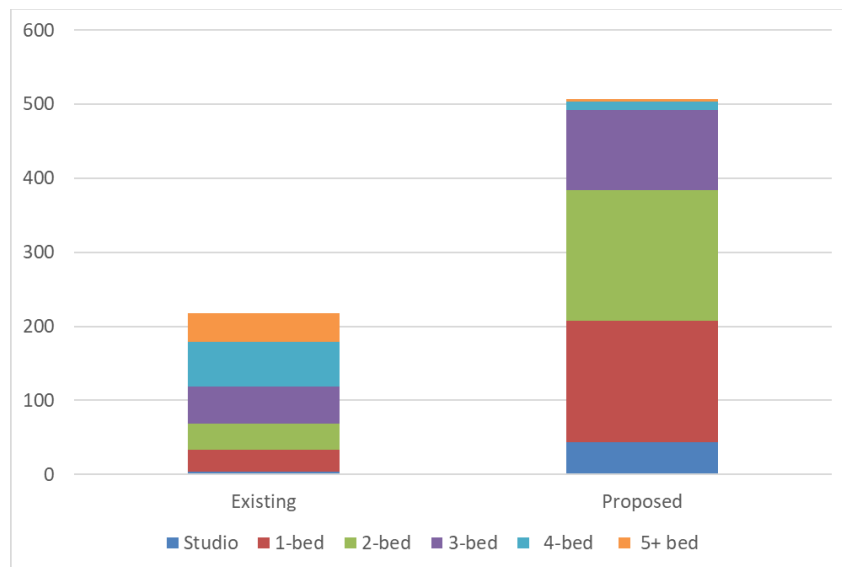


Chart 1 Size of new units created through conversions 2016-2020 (completions)

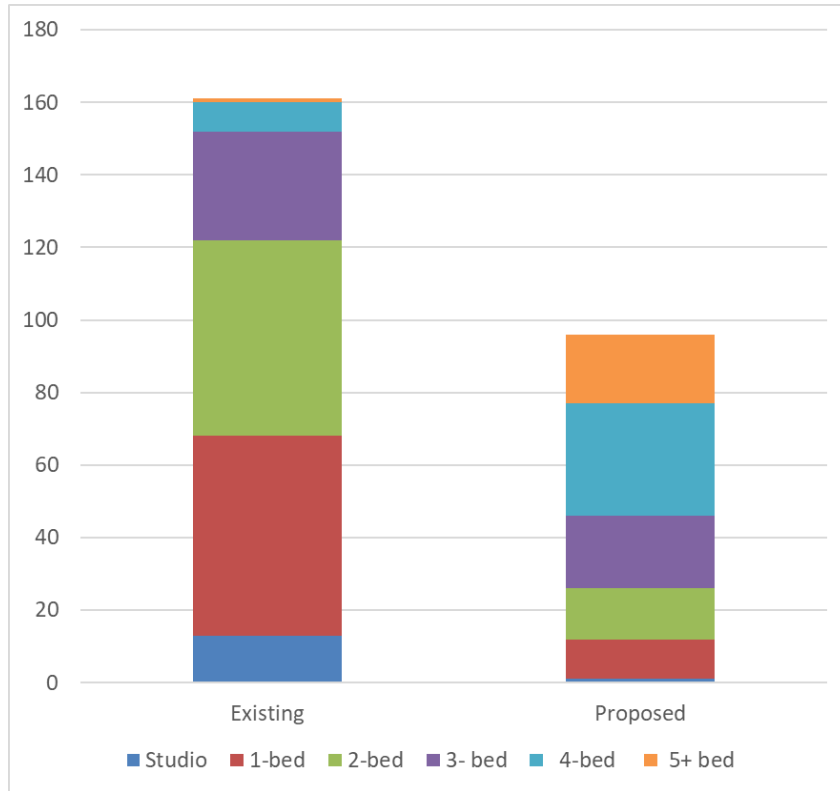


Chart 2 Size of new units created through de-conversions 2016-2020 (completions)

Conversions completions (gross), 2016-2020						
	Studio	1-bed	2-bed	3-bed	4-bed	5+ bed
Delivered	43	164	177	108	12	3
Delivered as a percentage	8%	32%	35%	21%	2%	1%
De-conversions completions (gross), 2016-2020						
Delivered	1	11	14	20	31	19
Proposed as a percentage	1%	11%	15%	21%	32%	20%
All completions (net), 2016-2020						
Total	203	2003	3681	1001	166	8
Delivered as a percentage	3%	28%	52%	14%	2%	0%
Future pipeline						
Total	644	4,068	6,924	2,542	352	240

Proposed as a percentage	4%	28%	47%	17%	2%	2%
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Table 10: percentage of dwelling types for conversions and de-conversions as well as all completions and future pipeline 2016-2020 (completions). 'Delivered' means the total number of units completed for each size classification, without allowing for units lost through deconversion.

The data shows that the completed conversions are delivering a mix of dwelling sizes, with a balance between 1 and 2 bed homes, and a relatively low proportion of studios. Conversions are also resulting in family sized units, which suggests that the policy requirement for family sized units to be part of the outcome is having some success in the form of mainly 3-bed units. In terms of this proportion (21%), conversions are more likely to deliver family homes than the future pipeline or the proportion from all completions, which sits at 14%.

Conversions completions (gross)		
	Non family-sized	Family-sized
Delivered	384	123
Delivered as a percentage	76%	24%
De-conversions completions (gross)		
Delivered	26	70
Delivered as a percentage	27%	73%
All completions (net)		
Delivered	5887	1175
Delivered as a percentage	83%	17%
Future pipeline		
Proposed	11,636	3,134
Proposed as a percentage	79%	21%

Table 11: Family sized units versus non-family sized units for conversions, de-conversions, all completions and future pipeline 2016-2020 (completions)

Table 11 above illustrates the percentage of family-sized units versus non-family sized units for conversions, de-conversions and future pipeline as well as all net completions. It is apparent from the table that conversions and de-conversions have produced more family sized units (24%) than the average of all completions (17%). Most of this is through deconversions, the down-side of which is the loss of at least one other unit. However, on balance, the net outcome from conversions and

deconversions is a consistent addition to the overall stock of the borough and an increase in the number of family units overall in the borough from this source.

There is no compelling justification for changing the approach in respect of the policy towards residential conversions and deconversions, beyond the reduction of the threshold concluded in Issue 1. During the period for which the data has been produced, the contribution of conversions to the small sites total has been relatively consistent, despite changes to the approach and different types of constraint and encouragement.

Housing Delivery through Redevelopment of existing dwellings (densification)

The introduction of the small sites target in the London Plan has focused Local Plans on sources of housing land that can contribute to this. There is some cross-over in these forms, and densification can include elements of conversion, extensions and new build. In categorising Wandsworth's small site approvals and completions, densification schemes account for around 10% of approvals and 7-8% of completions (see Charts 2, 3, 5 and 6 above).

The London Plan discusses 'incremental intensification' of existing residential areas through combinations of 'new build, infill development, residential conversions, redevelopment or extension of existing buildings...where this results in additional housing'. This also clearly has overlaps but, along with the explicit reference to 'evolving local character' in part B of Policy H2, means that existing built up areas will need to accommodate new development, making them gradually denser. This in itself can bring benefits (e.g. greater critical mass to support services and centres) and challenges (e.g. managing waste, parking and storage). Wandsworth has the Urban Design Study to help to make decisions on where development of this kind is appropriate and where it can accommodate the greatest change.

The adopted plan encourages residential development on appropriate sites (excluding residential gardens) at Policy DMH4 subject to various (mainly design and amenity) considerations. The adopted plan does not explicitly encourage 'densification'.

The Regulation 18 Local Plan introduced a policy, LP7, to encourage proposals for intensification on small sites in line with the direction of the London Plan and guided by Wandsworth's Urban Design Study. The revised policy in the Regulation 19 Plan has introduced the 130sqm threshold to ensure that the redevelopment of existing residential properties does not involve the loss of family homes. This creates a clear link with the residential conversions policy and ensures that there is no confusion between conversion and intensification, and all forms of small site development have a similar approach to the protection of family housing.

Completions through densification development in Wandsworth between 2016 and 2020 are shown below.

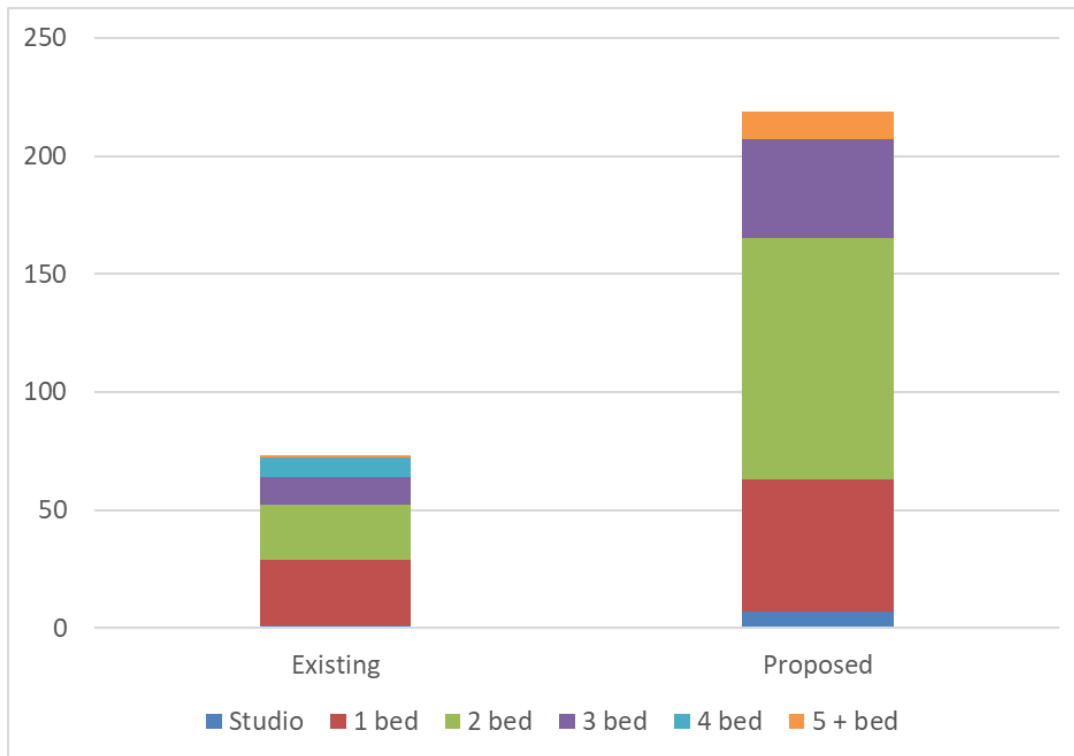


Chart 3 Size of new units created through densification 2016-2020 (completions)

The graph shows that densification schemes are a good source of new units on small sites, and provide a range of accommodation types across family and non-family sized accommodation, particularly in 2 and 3-bed units. In the case of recent years, the biggest uplift has been in the largest units, though the numbers involved are very small.

Densification completions						
	Studio	1-bed	2-bed	3-bed	4-bed	5+ bed
Existing	1	28	23	12	8	1
Proposed	7	56	102	42	0	12
Proposed as a percentage	3%	26%	47%	19%	0%	5%
All completions						
Proposed	203	2003	3681	1001	166	8
Proposed as a percentage	3%	28%	52%	14%	2%	0%
Future pipeline						
Total	644	4,068	6,924	2,542	352	240
Proposed as a percentage	4%	28%	47%	17%	2%	2%

Table 12: Percentage of dwelling types for densification versus future pipeline and all completions 2016-2020 (completions)

Roughly, densification has tripled the number of units on these sites, with a good return on larger units compared with all completions. The mix achieved is similar to the pipeline mix. As can be seen in the table below, the delivery of family homes is above the rates achieved by all completions and pipeline supply.

Densification completions		
	Non family-sized	Family-sized
Proposed	165	54
Proposed as a percentage	75%	25%
All completions		
Proposed	5887	1175
Proposed as a percentage	83%	17%
Future pipeline		
Proposed	11,636	3,134
Proposed as a percentage	79%	21%

Table 1: Family sized units versus non-family sized units for densification, all completions and future pipeline 2016-2020 (completions)

Conclusions

There is no compelling justification for changing the approach in respect of the policy towards densification (though emerging Policy LP7 certainly formalises the importance of densification as part of its approach in fulfilling the small sites target). Densification offers one form of development on small sites, and currently this type of development accounts for around 10% of completions on small sites. Provided that other considerations are abided by in development – particularly around design and amenity and guidance provided by the Urban Design Study (set out in part C of LP7) – densification would continue to provide a source of new homes which will contribute to the borough’s housing target.

The policy approach is encompassed within policy LP7 and the London Plan Policy H2. As discussed earlier, much of the borough is within the PTAL 3-6 / 800m of a town centre, and sites will be available in these areas and will come forward without the need for allocation. The rate at which they come forward and contribute to the small sites target will be monitored.

Housing Delivery through extensions

Wandsworth’s emerging approach to extensions is set out in policy LP5 of the Wandsworth Local Plan, though this is not specifically related to the creation of self-contained dwellings. Residential extensions that create a net increase in housing on a small site would also be covered by LP7.

Not all extensions result in the creation of an additional self-contained residential unit. Where they do, this is usually in combination with a residential conversion. However, extensions alone can

provide an effective and relatively affordable way for households to expand, in some cases preventing the need to move to a new house altogether. This flexibility for householders in Wandsworth is important to maintain and promote mixed and balanced communities and help provide more affordable types of market housing.

There has been a small, but steady, supply of new units created through extensions, as shown in earlier charts, averaging 20 units per year (net) on sites under 0.25 ha (2016-2021). The current approach coupled with the proposed change in the policy approach to the conversion of houses into flats has the potential to deliver additional homes.

Given extensions are a small proportion of any overall small sites contribution, and many extensions do not give rise to new self-contained units that would contribute to the overall housing target, it would be difficult to develop a specific strategy for extensions that would significantly raise the prospect of further units being delivered.

Housing Delivery through Private Gardens

Backland, or garden development, has historically been a common form of development in urban areas, varying in form and quality and ranging from single garden plots to larger combinations of many gardens. They do bring design issues around factors such as access, privacy and amenity.

The National Policy Planning Framework has excluded residential gardens from the definition of previously developed land, which has made them less attractive in policy terms for development purposes (particularly housing). The adopted Wandsworth Plan echoed this approach, excluding residential gardens from the definition of 'appropriate sites' for residential development at Policy DMH4, and includes a lengthy explanation that relates this exclusion to the NPPF / London Plan of the time, both of which also supported an approach which excluded residential gardens from the canon of available developable land.

Because of the explicit exclusion of residential gardens from previously developed land, the Published London Plan does not make a similar statement about gardens, though 'incremental intensification' might be interpreted as including collections of gardens in some contexts. The Regulation 18 Wandsworth Plan does not completely exclude the development of '*a limited scale of back garden development*' subject to considerations set out in the remainder of Policy LP7.

The Regulation 19 Plan takes a slightly firmer approach to back gardens, stating at LP7 part (E), '*Proposals for additional housing on private residential gardens will not normally be permitted due to the need to maintain local character, amenity space and biodiversity. The loss of garden land will only be considered acceptable in exceptional circumstances where the proposal is for comprehensive redevelopment of a number of whole land plots*'. In this instance, the maintenance of local character, amenity space and biodiversity is given a higher prominence and ought to be given greater weight than the need for housing. This is considered to be the right approach to garden development at the current time, but will need monitoring in the context of the small sites target.

Summary of outcomes

This paper has discussed matters in relation to policies LP7, LP25 and LP26 of the Regulation 19 Local Plan. These policies address the approach to small sites and reflect the London Plan Policy H2, and work together to ensure that existing housing stock – particularly family housing – is not compromised or undermined by the approach to housing delivery, particularly on small sites.

This report addressed three main issues:

- The threshold at which Policy LP26 deals with residential conversions;
- Ensuring that the small sites target can be met, through completions and pipeline data;
- Demonstrating that an approach that may restrict residential conversions and small site redevelopment does not undermine or compromise meeting the small sites target.

In respect of the first issue, the threshold ensures that smaller houses are not converted where it could accommodate a family, and larger houses are converted to include at least one family unit. Historically, the threshold started at 120sqm, but was raised to 150sqm in the adopted plan after it was estimated – via a 2008 study – that the majority of houses in the borough are over 120sqm.

However, the 150sqm threshold has been challenged by the Mayor as it is high in comparison with the London Plan space standards. Comparison with other boroughs suggests that 150sqm is also high compared with other boroughs with similar approaches. Most other boroughs have a threshold set at 130sqm (as originally constructed).

The Local Plan (Regulation 19) now uses 130sqm as the threshold to reflect these two considerations. It also drops the previous approach of including extensions completed before the end of 2008 (which was based on the 2008 study), and now uses the originally constructed dwelling (which is in common use across other London boroughs). In practice, this is likely to see no significant difference in the number of dwellings falling above and below the threshold.

In respect of the second issue, current data suggests that planning approvals on small sites are well above the target for small sites. This is generally translating to completions close to – whether above or below – the small sites target set in the London Plan. The number of completions has dropped below the target in 2020/21, but the number of approvals has increased in the same period. Monitoring will be required to see how this fares in coming years.

The target has been met in past years alongside the threshold approach for conversions, and there is no reason to believe that this cannot be the case in coming years. It is the case, however, that the pandemic will have impacted upon patterns, and this will need careful consideration over the remainder of the plan period. Nonetheless, the emerging policy framework encourages a positive approach to small site development that aims to encourage and allow opportunities on small sites that come forward.

The conversions threshold has now been applied to Policy LP7 and Policy LP25. This means that existing housing will be protected unless it is being replaced at the same or a higher density (using Policy H8 of the London Plan), that larger dwellings with a floorspace above the threshold will be expected to provide an uplift in family-sized dwellings and family dwellings can be created through deconversions up to 130sqm. The impact of all of these restrictions should generally be an increase in dwellings. In the case of deconversions, the numbers remain small, and we have seen that deconversion have a high rate of success in proving family units.

Overall, with the supply of completions and approvals above the small sites target, and limitations on small sites no more onerous than previous policies (and subject to design and amenity considerations), it is not considered that these restrictions threaten to undermine progress towards meeting the small sites target. The expected undersupply of family sized housing through the pipeline supply – along with a recommendation through the Local Housing Needs Assessment – means that the threshold approach to maintaining and creating family-sized units is justified, though the position will need to be monitored in coming years. The approach allows a balance between providing housing to meet need and maintaining a balance of housing types and sizes throughout the borough to meet the needs of the population.

Appendix One: Policies LP7, LP25 and LP26 of the Wandsworth Local Plan Regulation 19

LP7 Residential Development on Small Sites

- A. **Proposals which provide for a net increase in housing on small sites of 0.25ha or less will be particularly supported in areas with good public transport accessibility (PTAL 3-6) and on sites within 800m of a Tube, rail station or Major or District town centre boundary (as defined in the London Plan).**
- B. **Proposals for additional housing within street frontages and on street corners in existing residential areas will only be supported where they are sensitively integrated into the street frontage, including by respecting the proportions and spaces of and between existing buildings. Where appropriate, development proposals will be expected to reduce uncharacteristic spaces within the street scene and enhance the character and appearance of the area through the replacement of poorly designed buildings.**
- C. **Proposals involving the redevelopment of existing residential properties will be supported when:**
 - 1. **The original dwelling has a floorspace of more than 130sqm (as originally constructed) or the proposal would provide an uplift in the number of family sized dwellings with direct access to a dedicated rear garden of at least 15sqm.**
 - 2. **The height, scale, massing and design of the development proposed would not cause harm to the character and appearance of the area, having had regard to the area's sensitivity to change (as defined in the Urban Design Study (2021)).**
- D. **Proposals for the redevelopment of vacant and underused brownfield sites will be supported where all other elements of the proposal are considered to be acceptable. Planning applications for the replacement of existing garages or car parks will need to demonstrate that these facilities are no longer required, in accordance with Policy LP51.**
- E. **Proposals for additional housing on private residential gardens will not normally be permitted due to the need to maintain local character, amenity space and biodiversity. The loss of garden land will only be considered acceptable in exceptional circumstances where the proposal is for comprehensive redevelopment of a number of whole land plots.**
- F. **Proposals for additional housing in existing residential areas on small sites should:**
 - 1. **ensure that all main entrances to houses, ground floor flats and communal entrance lobbies are visible from the public realm and clearly identified;**
 - 2. **retain or re-provide features important to the character and appearance of the area or which support biodiversity, in accordance with policy LP56 (Tree Management and Landscaping);**
 - 3. **provide adequate servicing, recycling and refuse storage as well as cycle parking in accordance with Policy LP2; and**
 - 4. **not result in the net loss of family sized dwellings with direct access to a dedicated rear garden of at least 15sqm.**

LP25 Protecting the Existing Housing Stock

- A. Existing self-contained housing will be protected in accordance with Policy H8 of the London Plan. In exceptional circumstances, the net loss of self-contained residential dwellings, and/or the loss of land previously used in whole or in part for residential purposes will be acceptable where:**
 - 1. the proposal involves combining no more than two non-family-sized dwellings in order to create a family-sized dwelling and the total floorspace of the new dwelling created will be less than or equal to 130sqm, or**
 - 2. a self-contained dwelling located above a non-residential use is no longer provided with a separate access to the street.**
- B. Where the loss of existing affordable housing is proposed, the Council will assess any planning application against the requirements of Policy H8 of the London Plan.**
- C. Proposals for the change of use of residential accommodation to short-term holiday lets will be resisted.**

LP26 Conversions

- A. The conversion of any dwelling with 130sqm or less floorspace (as originally constructed) into flats will only be permitted where it can be clearly demonstrated that the existing dwelling is unsuitable for families.**
- B. The conversion of any dwelling with more than 130sqm of floorspace (as originally constructed) into flats will only be permitted where the following criteria are satisfied:**
 - 1. at least one family-sized dwelling is provided with direct access to a dedicated rear garden of at least 15sqm; and**
 - 2. where no more than one unit is provided as 1 person/studio accommodation.**

For more information write to:
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