

Residential Conversion Study Supporting Evidence for the New Local Plan

December 2019

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1 Introduction

- 1.1.1 Following local concern regarding the scale of residential conversions (extension and/or division of properties to enable sub-divisions into multiple units or conversions to HMOs), the Council has undertaken this study to assess the impact of residential conversions and provide policy recommendations for the emerging Local Plan. The same concern has been echoed at the Council's motion in July 2018 to 'conserve our family homes recognising that the untrammelled conversion of family homes into flats can change the character of an area, and believes the Borough should place a ceiling upon the extent to which such conversions can take place on any road'.
- 1.1.2 The residential conversion study will form part of Barnet's emerging Local Plan evidence base and will support residential conversion policy within the Local Plan. 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.
- 1.1.3 Banet has a policy framework in place which enables residential conversions in certain locations of the borough and under certain circumstances. It has Residential Design Guidance Supplementary Planning Document (SPD) to support this. Details on this policy can be found in section two.

1.2 Study Area

- 1.2.1 The Study area for this paper covers the London borough of Barnet an area of 87 square kilometres which is predominately residential in character. The residential element of Barnet consists of mainly detached, semi-detached and terraced housing.

1.3 Scope of this study

- 1.3.1 This Study will assess the extent of residential conversions in the Borough and in particular the impact of residential conversions of houses to flats. The Study will look at:
 - a. the impact that this has on the housing supply and availability of family housing;
 - b. the impact on the amenity and character of residential neighbourhoods and;
 - c. the ability to achieve and maintain mixed and balanced communities in the context of national, regional and local policy.
- 1.3.2 Specific types of residential conversions that will be considered in this study include:
 - Houses to flats – The conversion of an existing house into one or more smaller units of accommodation.
 - Subdivision of flats – when an existing flat is subdivided into smaller residential units
 - Flats converted back to houses – conversion of one or more flats back into a single dwelling house.
 - House in Multiple Occupation (HMO) – conversion back into single dwelling or self-contained units
 - Houses to houses –This is the type of conversion that occurs when two houses are merged together to produce a larger house.
 - Flats to studio – One or more flats which are converted into one or more studios.
 - Flats to HMOs – one or more flats that are converted into HMOs.
 - House to studio – This type of conversion occurs when a house is converted into smaller studio units

- House to HMOs

1.4 Report structure

1.4.1 This report sets out the findings and recommendations. The remainder of this report is set out as follows:

- Section 2: Policy Context
- Section 3: Appeals analysis
- Section 4: Conversions allowed
- Section 5: Future housing need and provisions
- Section 6: Policy recommendations

1.5 Suburban Streetscape character in Barnet

1.5.1 Whilst there is significant growth and development within Barnet, large areas of the Borough are characterised by low density, suburban housing predominantly semi-detached and detached housing. In many streets, a major part of the established character is derived from housing that is of similar style, size and form. Many residential areas have a predominant suburban identity, characterised by houses set back from the road with front gardens and gaps between buildings. In addition, there are a number of localities which have their own special character deriving in part from the design, type and size of dwelling and the materials used.

1.5.2 The impacts of residential conversions can have detrimental impacts on local character and lead to:

- Loss of larger single dwellings
- Interruption of consistent dwelling front setbacks
- Disturbance of the typical dwelling façade and dwelling entry pattern
- Intensification of dwelling use
- 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 as minimum space standards are not met
- Impact on local character such as external alterations for waste and parking

2 Policy Context

2.1.1 This section identified the policy context for the relevant national and regional planning policies that need to be considered, as well as the local policy context and examples of conversion policies from a range of other London boroughs.

2.2 National Policy – National Planning Policy Framework (Feb 2019)

2.2.1 The NPPF supports a presumption in favour of sustainable development, whereby Local Plans should positively seek opportunities to meet the development needs of their area and meet objectively assessed needs.

2.2.2 The framework places a large emphasis on housing supply, particularly ways to improve housing delivery to achieve the goal of delivering a sufficient supply of homes.

2.2.3 Paragraph 59 states that in order to “support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed”.

2.2.4 In determining the number of homes required, strategic plans should be based on a local housing needs assessment. Within this context, policies should identify the size, type and tenure of homes required for different groups in the community (for example, families with children, older people, students, people with disabilities and, people who rent their homes) (paragraph 61).

2.3 Regional Policy

2.3.1 London Plan 2016 (consolidated with alterations since 2011)

2.3.2 The London Plan 2016 sets out a broad strategy for how London will change and develop up to 2031. Key policies contained within the plan include Policy 3.3 increasing housing supply, Policy 3.5 Quality and Design of housing Developments, Policy 3.8 Housing Choice, Policy 3.9 Mixed and balanced communities.

2.3.3 Policy 3.3 identifies minimum housing provision targets for local authorities over the period 2015 to 2025. London borough of Barnet has been set a ten-year housing target of 23,489 additional homes, which equates to approximately 2,349 net additional homes per year (refer to Table 3.1 in the London Plan). These targets are for net homes, and include additional dwellings provided through development and redevelopment, and conversions (subdivision) of residential properties and changes of use from non-residential properties. Through the Local Plan preparation, boroughs should seek to achieve and exceed the relevant minimum housing targets.

2.3.4 Policy 3.5 states that housing development should be of the highest quality internally, externally and in relation to the context of the wider environment. Minimum space standards have been set in relation to this policy, which are based on a minimum gross internal floor area, relative to the number of occupants (Figure 1) and new homes should have adequately sized rooms and a convenient lay out.

Figure 1: London Plan – Space Standards

Bedrooms	Bedspaces	Minimum gia (sqm)			Built-in storage (sqm)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Notes to Table 3.3

1. *Where a one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.
2. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²)
3. The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

2.3.5 Under Policy 3.8, boroughs are required to identify the full range of housing needs in their areas. Local plan policies should ensure that a range of housing choices is offered in terms of housing type and size to take account of different groups. The provision of affordable family housing should be a strategic priority within Local Plan policies. In addition, houses should be built to Lifetime Homes Standards and ten percent of homes should be wheelchair accessible or easily adaptable for wheelchair users.

2.3.6 Policy 3.9 promotes mixed and balanced communities by tenure and household income This is to foster social diversity and inclusion and should be supported by effective and attractive design, adequate infrastructure and an enhanced environment,

2.3.7 Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities. Policy 3.5 encourages good quality and design for new development and sets out minimum floorspace requirements.

2.3.8 The London Plan considers that a rigorous appreciation of housing density is crucial to realising the optimum potential of sites. Policy 3.4 proposes density ranges for new development, which vary depending on location (e.g. suburban, urban and central) and public transport accessibility level (PTAL) (e.g. 0 – 6).

2.4 Draft London Plan - consolidated changes July 2019

- 2.4.1 The Draft London Plan (DLP) sets out new and amended policies that will guide future development in London. Until the draft plan is finalised, (anticipated to be 2020) the policies contained within will be a material consideration.
- 2.4.2 The Examination in Public (EiP) on the new London Plan was held between 15th January and 22nd May 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019. The Mayor considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State (SoS) his intention to publish the London Plan along with a clean and tracked version of the Intend to Publish London Plan, a statement of reasons for any of the Inspectors' recommendations that the Mayor does not wish to accept and a note that sets out a range of interventions that will help achieve the housing delivery set out in the Plan. The SoS report is not due until third week of Feb 2020. In the meantime, the intend to publish Plan is used as a material consideration.
- 2.4.3 Under Policy H2 small sites, existing residential areas within PTALs 3-6 and within 800m of a tube or rail station or within a town centre boundary are expected to play an important role in meeting housing targets, particularly in Outer London. One way of achieving this is through residential conversions. The DLP notes that the character of some areas may need to evolve to accommodate additional housing but emphasises that plan-making should change from preserving what is already there at the moment towards encouraging and facilitating the delivery of well-designed additional housing.
- 2.4.4 When determining planning applications, Policy H12 sets out a range of factors that planning authorities need to consider, including the mix and type of housing needed in a particular area and the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock. However, it also states that boroughs should not set prescriptive area-wide dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes as this is often inflexible and not capable of meeting the identified need for which they are being required. For example, larger units are often required by boroughs in order to meet the needs of families, but many such units are instead occupied by sharers.
- 2.4.5 In addition, well-designed one-and two-bedroom units in suitable locations can also attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development. While One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.

2.5 Housing Supplementary Planning Guidance (updated August 2017)

- 2.5.1 The SPG notes that conversions from houses to flats make a significant contribution to net housing delivery in London. The SPG goes on to state that in general, local restrictive policies, including those based on ‘conversions quotas’ should not be applied without robust justification (paragraph 1.2.34)
- 2.5.2 The SPG also notes that due to market signals, such as a lack of new build homes, increasing house costs and smaller households, there is likely to be a continued demand for conversions of larger homes into flats. A balance needs to be struck between realising the potential of conversions to address housing need and sustaining the residential quality and amenity of neighbourhoods where pressure for conversions is intense (paragraph 1.2.36).

2.6 London Housing Strategy (August 2018)

- 2.6.1 The London housing strategy, sets out the Mayor's vision for housing. Building the right number of homes and the right mix of housing are central to this vision, which is underpinned by five priorities:
- Building homes for Londoners: To help address the housing crisis in London, there is a need to build more homes by bringing forward more land for housing, such as small sites and higher density of development. The number of homes built on small sites has increased in Outer London but this is driven exclusively by conversions of houses into flats and by change of use (box 1) .
 - Delivering genuinely affordable homes: This strategy seeks to ensure that more homes are affordable to Londoners on a mix of incomes and backgrounds.
 - High quality homes and inclusive neighbourhoods: To ensure that London remains an attractive place to live and work, new homes and neighbourhoods must be well designed and to a high quality. This also includes meeting the diverse housing needs to support changing demographics.
 - A fairer deal for private renters and leaseholders: This policy seeks to protect London's two million private renters, who have faced a number of challenges including increasing rents, a lack of security and in some cases, poor housing conditions. Due to the lack of affordable housing, there has been a sharp increase in the number of families living in rented accommodation, where they compete with professionals sharing family-sized homes.
Tackling homelessness and helping rough sleepers: This policy seeks to prevent homelessness and help homeless people into housing by investing in sustainable homes for homeless Londoners to live and by supporting joint efforts between councils.
- 2.6.2 The Strategy estimates that around 250,000 homes in London are overcrowded. These homes contain around 380,000 distinct ‘family units’. Overcrowded homes are generally those with a single-family unit who need a bigger home and those in which overcrowding is caused by there being more than one family. Rates of overcrowding are higher amongst those on low incomes, those who rent and those from BAME communities.
- 2.6.3 The Strategy recognises that the capital needs a broad range of housing sizes, particularly family size homes. Ensuring an appropriate supply of family-sized homes is also a priority within the Strategy. Delivering more family sized homes in Outer London is promoted as these are likely to be more affordable. In addition, the Strategy also supports downsizing to help free up homes for families.

2.7 Local Policy Context

- 2.7.1 The London borough of Barnet Core Strategy and Development Management Policies were adopted in 2012. The council is now in the process of preparing its emerging Local Plan which will replace current policies once adopted.
- 2.7.2 The Core Strategy sets out the spatial strategy for the area and highlights the Three Strands Approach to planning which is to protect, enhance and consolidate growth.
- 2.7.3 Under this approach, the Council will aim to consolidate housing growth in well located areas whilst also seeking to preserve the character of the borough. One of the key objectives within the Core Strategy is to manage housing growth and meet housing aspirations. The Strategy notes that in order to create successful communities, there is a need to maximise housing choice by providing a range of sizes and types of accommodation, including homes for those who need larger dwellings such as families as well as homes for smaller households. Policy CS4 aims to provide quality homes and housing choice.

2.8 Development Management Policies

- 2.8.1 The Development Management Policies document has recognised that the conversion of existing dwellings into flats can have a cumulative effect that is damaging to the quality of the environment and detracts from the character of established residential areas. Conversions may be appropriate in certain types of property or street particularly where they are highly accessible. However, even in such locations they can harm the character of areas by changing external appearance and increasing activity. Such activity can often involve more people movements, increased car movements and parking stress, more rubbish to be collected and more deliveries”.
- 2.8.2 Whilst there is no specific policy which deals with residential conversions, Policy DM01 Protecting Barnet’s Character and Amenity provides some guidance and states that the conversion of dwellings into flats in roads characterised by houses will not normally be appropriate. It also states that in instances where conversions are acceptable, they should seek to minimise their impact on the external appearance of the property and local character and should consider dwelling size priorities and an approach to parking management.
- 2.8.3 Policy DM02: Development Standards sets out criteria that residential development proposals must meet, which include the London Plan space standards to be applied to new development.

2.9 Residential design guidance (2016)

- 2.9.1 The Residential Design Guidance SPD sets out how the Council considers applications for the conversion of single family dwellings into two or more self-contained units including Housing in Multiple Occupation (HMOs). The main principles regarding residential conversions are as follows:
- conversions of houses into flats or HMOs, in roads characterised by houses will not normally be appropriate
 - consideration should be given to local character and surroundings and conversions that harm this, (due to cumulative impacts of such conversions) will be refused
 - the unit size should normally comply with Barnet’s space standards highlighted in Appendix 2
 - usable amenity space should normally be provided for the occupiers of all units

- consideration should be given to the necessary provision and associated activities such as car and cycle parking spaces, storage, hardsurfacing and refuse store at the earliest stage of design
- where conversion take place, any impact on the amenity of future residents and neighbouring properties should be minimised.

2.10 Barnet's Growth Strategy 2019 – 2030

2.10.1 This document sets out the Council's commitments to making Barnet a place that enables people to live happy, healthy lives by offering them the range of homes, parks, schools and other facilities that they need, while also protecting and enhancing the borough for generations to come. The Strategy sets out to address three key principles:

1. It should seek to shape the changes to local places across the borough;
2. There is a need to increase housing supply and deliver associated infrastructure for Barnet's growing population including ensuring delivery of homes people can afford; and
3. It should capitalise on demand for development, and ensure the benefits of growth are maximised for residents.

2.11 Barnet Housing Strategy 2019 – 2024 (2019)

2.11.1 The Housing Strategy outlines some of the challenges faced by the borough including increasing population and demand for housing, as well as financial constraints. In addition, there is the issues of increasing housing costs which has resulted in an affordability gap and a shift in tenure with a significantly higher proportion of people now living in private rented accommodation. To help combat some of these issues, the council has identified five themes for the Housing Strategy to focus on:

1. Raising standards in the private rented sector
2. Delivering more homes that people can afford
3. Safe and secure homes
4. Promoting independence
5. Tackling homelessness and rough sleeping in Barnet.

2.11.2 To try and increase housing supply and address the affordability issues, the council is proposing to bring long term vacant properties and redundant commercial units where there is potential for conversion or redevelopment.

2.12 Review of other London borough Conversion Policies

2.12.1 This section reviews the residential conversion policies that other London Boroughs have (in order of adoption year), in order to identify and compare the varying approaches to residential conversions.

2.13 Barking and Dagenham (2010)

2.13.1 Barking and Dagenham have been set a minimum ten-year housing target of 12,355 new homes between 2015 – 2025. Within the Core Strategy, it is recognised that conversions to flats can provide a valuable source of housing for smaller households and can contribute to meeting housing need in the Borough. However, in terms of the subdivision of existing housing into flats, there needs to be a balance of these advantages against the need to protect and increase the supply of family housing.

- 2.13.2 As a result, a more stringent approach to preserving family housing has been introduced, particularly 4 bed homes as there is a shortage of this kind within Barking and Dagenham.
- 2.13.3 Barking and Dagenham is therefore seeking in its policy to preserve and increase the stock of family housing in the Borough. When planning permission is required, the Council will resist proposals which involve the loss of housing with three bedrooms or more.
- 2.13.4 Other proposals for flat conversions or homes in multiple occupation (HMOs) will only be considered acceptable provided that the number of houses that have been converted to flats and / or HMOs in any road (including unimplemented but still valid planning permissions) does not exceed 10% of the total number of houses in the road.
- No two adjacent properties apart from dwellings that are separated by a road should be converted.
 - No significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance.
 - Regard is had to the appropriate design, transportation, and internal and external amenity space standards policies.
 - The internal space standards required by Policy BP6 (?) can be met for all of the proposed new dwelling units.
 - Adequate space is provided to store refuse and recycling ready for collection

2.14 Brent (2010)

- 2.14.1 Brent Council have been set a minimum housing target of 15,253 between 2015 and 2025 within the London Plan. Brent recognises that there is a shortage of family-sized homes in the borough and over the years, has lost irreplaceable larger family accommodation through housing conversions, redevelopment schemes and demolition.
- 2.14.2 Family accommodation, which is defined as a self-contained dwelling capable of providing at least three bedrooms, would not be required on sites where it is not possible to provide a satisfactory environment for young children, particularly due to a lack of external amenity space, or where there is a strong justification for accommodating households without children, such as sheltered housing.
- 2.14.3 Policy CP 21 A Balanced housing stock states that the plan seeks to maintain and provide a balanced housing stock by protecting existing accommodation that meets known needs by ensuring that new housing appropriately contributes towards the wide range of borough household needs including an appropriate range and mix of self-contained accommodation types and sizes, including family sized accommodation on suitable sites.
- 2.14.4 DMP 16 Resisting housing Loss notes that the provision of family homes are a priority for Brent. Therefore, the de-conversion of flats into a family size dwelling will be supported where it results in the net loss of no more than one dwelling of 2 bedrooms or less.
- 2.14.5 Policy DM17 recognises the valuable contribution that the conversion of existing housing stock into smaller dwellings makes towards increasing the overall housing supply in London, however, as family housing is a priority and will seek to protect this. Consequently, Policy DM17 states that the conversion of a family sized home to two or more other dwellings will only be allowed where the following criteria is met:

- a) The existing home is 130 sqm or more, and
- b) It results in at least 3- bedroom dwelling, preferably with direct access to garden/amenity space

2.14.6 Exceptions to this will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely and it could not reasonably be changed to overcome deficiencies.

2.15 Merton council (2011)

2.15.1 Merton Council have been set a minimum housing target of 4,107 between 2015 and 2025 within the London Plan Merton council have identified that almost 50% of future housing delivery would need to take the form of three bedroom units and 47% would need to be 1 or 2 bed dwellings to meet housing need. However, 84% of new dwellings in the borough between 2004 and 2009 consisted of smaller 1 and 2 bed units.

2.15.2 In addition, it was found that there was a significant number of single dwellings being converted into two or more smaller units. In order to retain existing stock of larger, family units, Merton council have implemented policy which means that applications for residential conversions include the re-provision of at least one family sized unit (three beds or more).

2.15.3 Policy 14 promotes well designed housing and sets requirements for the conversion of residential dwellings, which include the minimum space standards. In addition, Merton's high quality street scape is characterised by consistent front building setbacks, front gardens and on-street parking. Where a conversions would have a detrimental impact on these characteristics will be resisted.

2.16 Newham (2012)

2.16.1 Newham Council have been set a minimum housing target of 19,945 between 2015 and 2025 within the London Plan Policy H4 Protecting and Reshaping the Existing Housing Stock of the Core Strategy is explicit in its intention towards conversions

2.16.2 "The Council will specifically seek to protect family housing and will resist the loss of all family dwelling houses through subdivision or conversions to flats or HMOs unless exceptional circumstances prevail. The Council will support proposals for de-conversion of flats, back to family dwelling houses..."

2.16.3 No details are provided in the Core Strategy as to what the exceptional circumstances might be. Other requirements including guidance on floorspace minima, size and other detailed design and layout requirements are within a SPD on Housing which sets out the following criteria for a property to be subdivided into flats:

- Minimum floorspace 120sq.m or larger;
- Not be in a specified street that has already had more than 25% of the properties converted into flats; and
- Have off-street car parking available, or be within an area that has capacity on-street

2.17 Haringey (2013)

2.17.1 Haringey Council have been set a minimum housing target of 15,019 between 2015 and 2025 within the London Plan. The Core Strategy has noted that conversions within Haringey have made a relatively small but consistent contribution to housing supply.

- 2.17.2 The incremental impact of this has resulted in some areas experiencing unsatisfactory levels of on-street parking and congestion, increased pressure on local services and adverse changes to residential character and amenity and a significant loss of larger family units.
- 2.17.3 It is expected that Haringey council will meet current housing targets through a range of methods including development and redevelopment on large sites (over 0.25ha) and small sites (below 0.25ha), and conversions from residential and non-residential properties.
- 2.17.4 Conversions and Houses in Multiple Occupation (HMOs) will have to meet all design and space standards set out in the Mayor of London's Housing SPG, and other relevant design guidance, in terms of minimum floorspace, habitable rooms, layout, dwelling mix, amenity space and privacy, and have a positive impact on the amenity, streetscape and character of the surrounding area of the development.
- 2.17.5 To maintain a supply of larger homes to meet housing need, under Policy DM16, conversions from larger homes to smaller ones will only be permitted where:
- a) It is located outside the Family housing protected Zone
 - b) The gross original internal floorspace of existing dwelling is greater than 120sqm
 - c) The proposed satisfies all other relevant policies, including the minimum internal space standards, satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection
 - d) The resulting units achieve internal configurations standards
 - e) The design of any external alterations does not detract from the appearance of the property, street, and where possible, retains a single door to the elevation of dwellings.
 - f) The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene
 - g) The proposal allows for a mix of uses
- 2.17.6 Conversions within family housing protection zones will only be considered where they result in no net loss in the number of family sized units. Conversions should be supported by car parking surveys which demonstrates that there is a residual car parking to support development.

2.18 Royal borough of Greenwich (2014)

- 2.18.1 Royal Borough of Greenwich (RBG) has the second largest housing target of all the London boroughs in the London Plan, with a minimum ten-year target of 26,850. The Core Strategy recognises that a mix of housing sizes and types will need to be developed, including conversions and family housing, which has been defined as having three bedrooms or more, with direct access to a garden and within close proximity to key services. This definition may be flexible in developments where dwellings have two large double bedrooms.
- 2.18.2 The RBG Core strategy highlights that the sub-division of dwellings can provide additional homes and help meet certain housing needs. Policy H5 housing Design states that where conversions are permitted, they should incorporate in the design and layout, protection against noise, air quality, lighting and/or vibration to preserve the amenity of future residents. The design and layout should also show consideration of the privacy of adjacent residents.

2.18.3 Whilst the Core Strategy recognises the contribution that residential conversions make towards housing supply, it also notes that the existing stock of small - medium sized homes are vital and need to be protected. Policy H (b) Conversions states that the sub-division of residential property will not be permitted in the following circumstances:

- i. The original premises is less than 111.48 sqm of net floor area (1,200 sqft) excluding any garages or less than 130 sqm of net floor area (1,400 sqft) where they form part of a terrace;
- ii. On street parking problems aggravate the safety and free flow of traffic and pedestrians in the area; or
- iii. The character and appearance of the surrounding area and buildings is adversely affected.

2.18.4 Policy H (b) also states that the sub-division of residential property will be permitted if the following criteria are fulfilled:

- i. Adequate, safe and secure access to all dwellings is provided;
- ii. Sound insulation is installed to alleviate the problems of noise both between the new residential units and between them and neighbouring dwellings, and sound insulation and ventilation treatment against road and railway noise is installed on noise sensitive facades;
- iii. Each unit of accommodation is self-contained;
- iv. Dwellings intended for families are provided on the ground floor or have direct access to a garden;
- v. The car parking provision is in line with the requirements of Policy IM(c)¹ and
- vi. Any extensions or additions are limited to an appropriate size and meet with the relevant design requirements

2.18.5 The supporting text of Policy H(b) notes that the policy criteria are tighter for terraced properties in recognition of the need to retain medium sized terraced properties in areas of conversion pressure and the greater difficulty of providing an acceptable standard of conversion (e.g. impact of noise, car parking).

2.18.6 In addition, consideration will be given to the existing conversions in each street, the nature of accommodation provided, the impact on the environment and the character of the area, including listed buildings and other heritage assets. Special consideration should be given to the division of the garden areas with the aim that all units have access to garden spaces. Other factors that will be considered are air quality, lighting/ vibration and privacy of adjacent residents.

2.19 Hounslow (2015)

2.19.1 Hounslow Council have been set a minimum housing target of 8,222 between 2015 and 2025 within the London Plan Within the Local Plan, Policy SC6 Managing building conversions and sub-division of the existing housing, has been put in place to ensure that conversions and sub-divisions contribute to the overall housing supply in the borough but do not have an adverse impact on the character of an area and/or amenity. This will be achieved by:

¹ Policy IM(c) Parking Standards has been put in place to ensure that developments provides a minimum level of car parking provisions necessary for people with disabilities and ensure provision for servicing, safe pick-up, drop offs and waiting areas for vehicles associated with the development are accommodated for.

- a.) Establishing a minimum net original floor area threshold for the conversion of houses to flats;
- b.) Requiring at least one family-sized unit (two bedroom - four person or more) be provided at ground floor in any residential conversion;
- c.) Recognising that properties in location suitable for more intensive household occupancy may be appropriate for conversion to HMO (Policy SC10) or conversion to several flats, other locations will be preferred to remain as family houses or potentially for conversion to flats of a more modest intensity of occupancy;
- d.) Ensuring all residential conversion maintain the amenity of neighbours and the general character of the surrounding area; and
- e.) Considering the cumulative impact of the proposed conversion with others in the vicinity of the application site.

Under this policy, development proposals will also be required to:

- f.) Have a minimum 130sqm net original internal floor area to be considered suitable for conversion or subdivision;
- g.) Provide at least one family-sized unit at ground floor, except in locations not considered suitable for families;
- h.) Have regard to the internal and external space standards;
- i.) Provide a good standard of living conditions and amenity for future occupiers in terms of privacy, daylight and outlook;
- j.) Be of a high-quality design and include provision for the storage of waste and recycling; and
- k.) Ensure that there is no undue loss of amenity for neighbouring occupiers and the surrounding area

2.20 Wandsworth (2016)

2.20.1 Wandsworth Council have been set a minimum housing target of 18,123 between 2015 and 2025 within the London Plan. The Core Strategy wants to ensure that housing targets are met and that the borough has the right mix of housing. The Wandsworth SHMA identified a need for larger accommodation, however policy contained within the Core Strategy has highlighted that there has been a of family housing and larger housing units through conversions.

2.20.2 The core Strategy recognises that conversions play an important role in increasing the number and variety of housing stock, but often having an adverse impact on communities. In order to protect larger housing units, Policy DMH2 Conversions states that the conversion of dwellings with less than 150sqm of existing habitable floorspace will only be permitted where the property is unsuitable for families.

2.20.3 In addition, conversions of dwellings of 150 sq ms or more of existing habitable floorspace (prior to any extensions carried out since the end of 2008) will only be permitted where the following criteria are satisfied:

- a.) at least one family-sized unit is provided with access to a dedicated rear garden; or
- b.) where four or more units are being provided, at least two are family-sized unit (one of which must have access to a dedicated rear garden); and
- c.) the provision of 1 bedroom/studio accommodation is limited to one unit, or 1 in 5 units in larger conversions;
- d.) All new units must comply with standards set out in Policies DMH4 and DMH6-7

- 2.20.4 Policy DMH4 Residential development including conversions further states that residential development, including new build and conversions, will be permitted on appropriate sites (which excludes residential gardens), where the following criteria are satisfied:
- a.) the proposal complies with the relevant Sustainable development principles;
 - b.) a satisfactory environment for housing is provided, taking into account any mitigation measures proposed;
 - c.) the proposal complies with internal space standards as outlined in the London Plan (see figure 1) and the Mayor's Housing Supplementary Planning Guidance (SPG) to take account of the national technical housing standards;
 - d.) adequate daylight to habitable rooms is achieved, incorporating dual aspect wherever possible, particularly where one of the aspects is north facing;
 - e.) residential units are fully self-contained (except those within specialist accommodation) and, in the case of flats above shops and other commercial premises, independent access from the street frontage is provided where this can reasonably be achieved;
 - f.) does not harm the amenities of the residential element within the scheme, or the residential amenities of the surrounding area;
 - g.) car parking and cycle parking appropriate to the nature of the development and location is provided in accordance with relevant policy;
 - h.) in the case of family flats and maisonettes above third floor level, a lift is provided;
- 2.20.5 Policy DMH6 Residential Space Standards states that proposals for residential accommodation, including conversions, will only be permitted where they meet the national space standards. For family size accommodation, proposals must contain a minimum of three bedrooms (one of which must be a double) with minimum overall space standards of
- a.) 74 sq ms for 3 bedroom, 4 bedspace units;
 - b.) 90 sq ms for 4 bedroom, 5 bedspace units.

2.21 Croydon (2018)

- 2.21.1 Croydon Council have been set a minimum housing target of 14,348 between 2015 and 2025 within the London Plan. However, the Croydon Local Plan has identified a housing need of 44,149 new homes up to 2036. The delivery of these houses will be supported through more efficient use of housing stock, including sub-divisions and conversions and change of use to residential.
- 2.21.2 Analysis carried out as part of the Local plan evidence base found that 50% of future need would be for larger homes, however, building levels in the borough are decreasing and therefore, existing three bed residential units should be retained and any conversions should ensure that there is no loss of three bed homes.
- 2.21.3 The council seeks the provision of a mix and range of housing, including larger three bed units to accommodate families. Policy DM1.1 supports the retention of residential units originally designed with three or more bedrooms.
- 2.21.4 Under Policy DM10 Design and Character, where a conversion or HMO is proposed, the council will consider the effects of noise, refuse collection and additional car parking on the character of an area. For this reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.

2.21.5 Policies DM10.4 and DM10.5 with design and apply to all conversions, detailing design and character specifications.

2.22 Redbridge (2018)

2.22.1 Redbridge Council have been set a minimum housing target of 11,232 between 2015 and 2025 within the London Plan. Within the Local Plan, the Council recognises that housing tenure in the borough has changed over the last decade, with a significant growth in the private rented sector and a reduction in home ownership. The private sector has doubled in size, with this type of growth concentrated in specific areas of the borough. With a significant growth in the private rented sector and a reduction in home ownership.

2.22.2 While the Council acknowledges the important role such housing provides, particularly to young professionals, it also recognises concerns from a number of existing residents that a concentration of such forms of housing can have a detrimental effect on the character and amenity of an area

2.22.3 Policy LP6 - Dwelling Conversions, Houses in Multiple Occupation and Buildings in Multiple Residential Occupation has been implemented to try and effectively manage housing growth. Under this policy, the Council will only support the conversion of larger home(s) into smaller self-contained units (C3) where:

- a) It is located in a Metropolitan, District or Local Centres
- b) The gross floor area of the property exceeds 130 sq.m where two units are proposed and exceeds 180 sq.m where three or more units are proposed;
- c) No significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance;
- d) Appropriate car and cycle parking provision are provided in accordance with London Plan standards;
- e) It meets the national space standards;
- f) The conversion provides at least one larger family sized home of 74 s.qm (3 bed plus) on the ground floor with access to a dedicated rear garden of the converted home

2.22.4 In addition, the council will only support the conversion of larger house(s) into Buildings in Multiple Residential Occupation (Sui Generis) where:

- a) The gross floor area of the property exceeds 180 sq.m;
- b) It meets the requirements of criteria 1(a), (c) and (d) above;
- c) It provides a Management Plan.

2.23 Conclusions:

2.23.1 The NPPF has a presumption in favour of sustainable development and requires Local Authorities to identify appropriate housing needs. It does not provide specific guidance on residential conversion but does state that housing land can come from a variety of forms.

2.23.2 The London Plan has set ambitious housing targets and supports residential conversions as a means of achieving this, particularly in Outer London and areas which are accessible in public transport terms. The plan encourages and promotes well designed additional housing, and notes that some areas may need to “evolve” to accommodate this.

- 2.23.3 Previous London Plans has defined family housing as those consisting of three or more bedrooms, however, the plan notes that many families do live in two-bedroom units and. Well-designed one and two-bedroom dwellings can also attract those wanting to attract those wanting to downsize and make way for family housing.
- 2.23.4 The majority of boroughs reviewed recognise the contribution that residential conversions make in terms of overall housing supply. However, it is also evident that boroughs are aware of the detrimental impact this can have on amenity and the local environment. Some of the key concerns noted are:
- loss of family housing,
 - loss of front gardens,
 - amenity impacts on existing residents - principally through increased noise and activity,
 - poor standards of accommodation – as minimum space standards are not met,
 - on street parking implications,
 - impact on local character such as external alterations for waste bins and parking
 - Refuse provision
- 2.23.5 Three of the boroughs (Wandsworth, Barking & Dagenham and Newham) reviewed are concerned about the loss of family homes and as such, have implemented policies which resist proposals that would involve the loss of housing with three or more bedrooms. In such instances, such proposals will only be allowed in certain circumstances.
- 2.23.6 Two Councils have set policies which limit conversions to designated areas, for example, Haringey will only allow conversions to take place in areas located outside the family housing protected zone. Similarly, Redbridge will only permit conversions that are located in a Metropolitan district or Local Centre.
- 2.23.7 Other councils will limit the percentage of single dwelling conversions in a street that can be converted, for example, Newham will not permit such development in a street that already has more than 25% of properties converted into flats.
- 2.23.8 Almost all of the boroughs reviewed that have a specific policy on conversions have outlined a set of criteria which must be met if proposals are to be acceptable. Nine boroughs have threshold requirements for the initial size of dwellings, ranging from 50sqm to 130sqm.
- 2.23.9 All of the boroughs have varying detail on design and layout of the flats, most provide room size requirements and configurations. Many boroughs also have a requirement for parking provision and a smaller number require refuse provision.

3 Appeals Analysis

- 3.1.1 The following section examines appeals made against refusals on conversion applications within Barnet and other London Boroughs, including Greenwich, Barking & Dagenham, Brent, Newham and Wandsworth.
- 3.1.2 The Council's Uniform database has been used to obtain data related to appeals against residential conversions, however, a COMPASS search was carried out to identify all appeals cases regarding residential conversions within other boroughs between April 2009 and March 2019. The results of this search provide an insight into different approaches Councils hold towards conversions and also reveal the effectiveness of the conversion policies within each borough.
- 3.1.3 This section provides an overview of the housing stock in London borough of Barnet and the extent of conversion activity from the period 2009 to 2019. Between 1st April 2009 and 31st March 2019, 17 appeal cases were allowed and a further 13 were allowed subject to conditions.

Table 1: Conversion appeals in Barnet and other London boroughs

Borough	Allowed		Dismissed		Allowed following conditions /legal agreement		Other	
	No	%	No	%	No	%	No	%
Barnet	17	17.14	67	67.66	12	12.12	8	8.08
Greenwich	3	33%	6	66%	0	0	0	0
Barking & Dagenham	2	11%	13	76%	2	11%	0	0
Brent	9	22%	26	65%	4	10%	0	0
Newham	8	18%	32	74%	3	7%	0	0
Wandsworth	2	15%	11	85%	0	0	0	0

Source: Compass search results

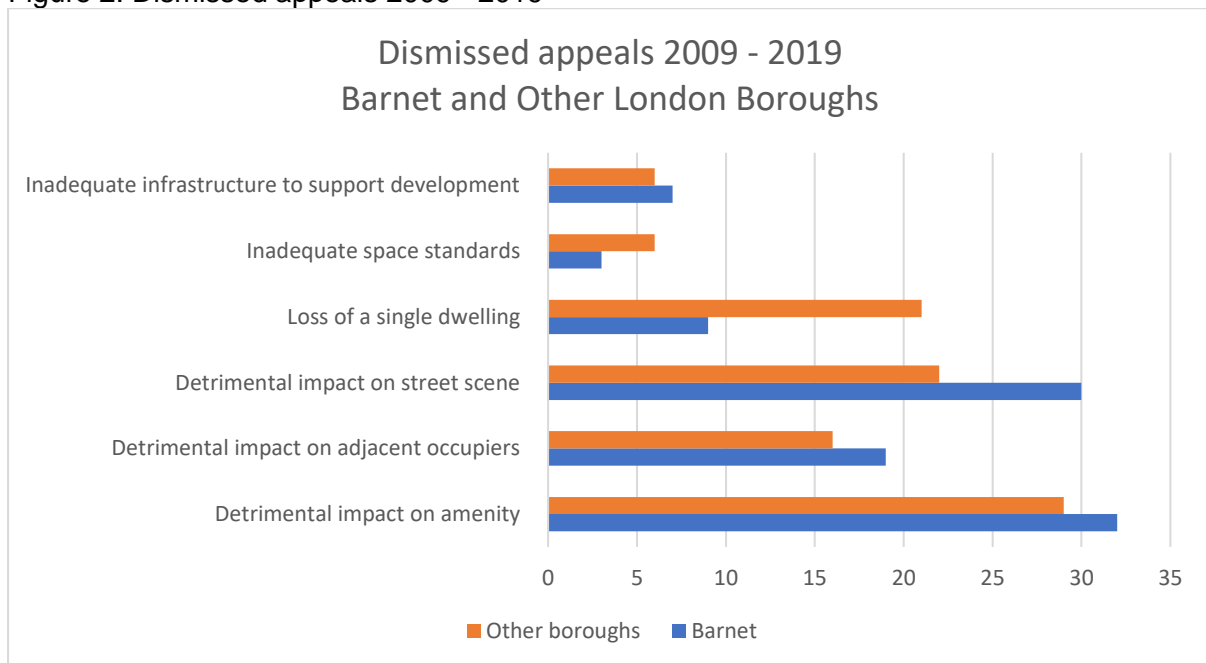
- 3.1.4 The table above shows the following in relation to appeals against conversions in the London Borough of Barnet:
- Between 1st April 2009 and 31st March 2019, the Council received 104 appeals against conversion application refusals.
 - Most of these appeals were dismissed, with over 67% of appeals being refused.
 - A further 17% of appeals were allowed and 12% were granted planning permission subject to planning conditions and/or a legal agreement.
 - In addition, 8% of appeals lodged were currently in progress or were withdrawn.
 - The high proportion of appeals that were dismissed by inspectors demonstrates a high level of support for the council's current policies related to conversions.
 - The proportion of dismissed appeals recorded by COMPASS for other London boroughs varied between 65% in Brent and 85% in Wandsworth.
- 3.1.5 As part of this study, detailed analysis on the reasons why appeal cases were dismissed have been carried out. From examining the Councils appeal record, the main reasons for dismissing an appeal fall into one or more of the below categories:
- detrimental impact on amenity (daylight, outlook, amenity space)
 - detrimental impact on amenity on adjacent occupiers

- detrimental impact on street scene / local character (design, effect, parking etc)
- Loss of a single dwelling
- Inadequate space standards
- Inadequate infrastructure/ facilities to support development

3.1.6 The Figure below highlights the number of times the above reasons were cited as part of a refusal in Barnet and in other London Boroughs. The data indicates that the three most common reasons in Barnet are detrimental impact on amenity, detrimental impact on the local street scene and character and detrimental impact on adjacent occupiers. This would indicate that these are important issues when determining planning applications.

3.1.7 When making comparisons between Barnet data and other London boroughs, it would appear that reasons for refusals in relation to residential conversions are broadly similar, however, the loss of a single dwelling is also a common reason for refusal in other boroughs.

Figure 2: Dismissed appeals 2009 - 2019



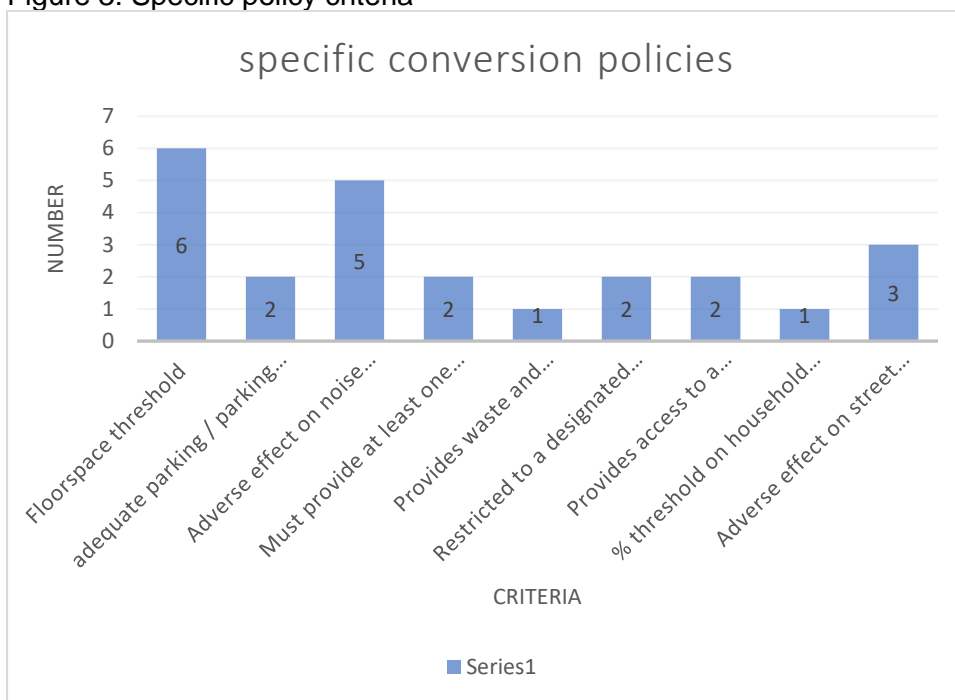
3.1.8 The policy review carried out in section two highlighted that not all Councils have a specific policy regarding residential conversion development (e.g. Barking and Dagenham, Newham and Croydon). However, each Council does provide criteria for conversions to ensure that any such development is of an appropriate standard and does not cause adverse impacts.

3.1.9 It is apparent that the most common policy criteria on residential conversions are floorspace thresholds and adverse effects on noise and amenity (please see table 2).

Table 2: Councils with specific policy criteria

Policy Criteria	Number
Floorspace threshold	6
adequate parking / parking provision	2
Adverse affect on noise and amenity	5
Must provide at least one larger/ family dwelling	2
Provides waste and recycling facilities	1
Restricted to a designated conversion area	2
Provides access to a garden / amenity space	2
% threshold on household types	1
Adverse affect on street scene / character	3

Figure 3: Specific policy criteria



4 Conversions Allowed - Analysis

4.1 Housing Stock

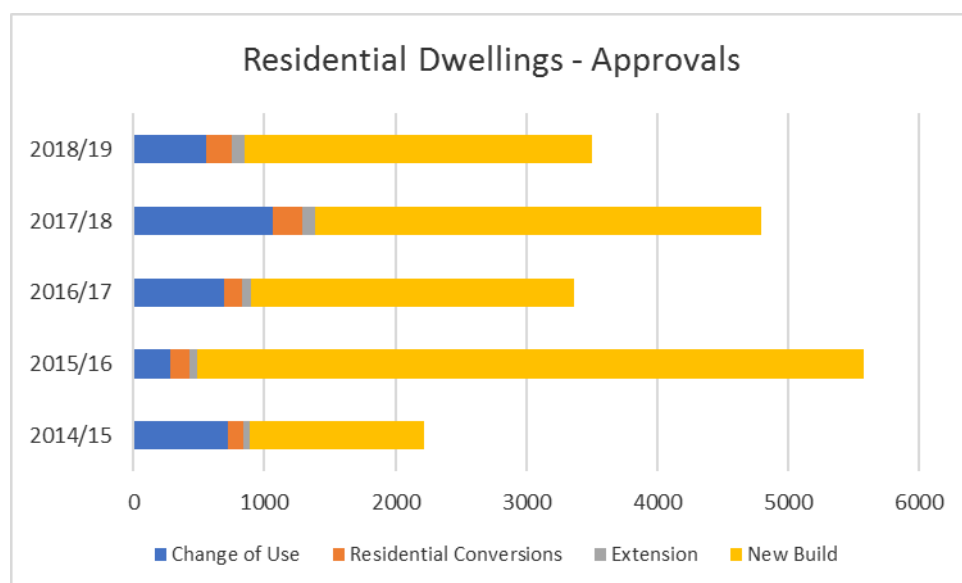
- 4.1.1 Barnet's housing stock is predominantly an older stock of over 50 years in age, is mainly in a good condition. About 62% of the stock comprises houses (terraced, semi-detached or detached) and 38% are flats and maisonettes. Almost 60% have 3 or more bedrooms, and only a very small percentage contain only one bedroom.
- 4.1.2 Housing tenure in Barnet is similar to other outer London boroughs, with 72% in owner occupation, but unlike the rest of London more housing is rented from the private sector (16%) than the social rented sector (13%).
- 4.1.3 Barnet's private rented sector is dominated by 1 and 2 bed units. This would suggest that this is predominantly flatted development. The owner-occupied stock is dominated by 3 and 4+ bed units which are typically houses.
- 4.1.4 The 2018 Housing Market Assessment (SHMA) for Barnet estimated that 5.3% of all households in Barnet are overcrowded while 32.7% under-occupy their dwelling

4.2 Conversions

- 4.2.1 Table 3 and 4 shows data taken from the London Development Database (LDD) relating to residential development approvals and completions from the period January 2014 and June 2019. This highlights the development type including new build, conversion, extension and a change of use.

Table 3: Approvals by development type

	New build		Residential Conversions		Extension		Change of use		Totals	
	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units
2014/15	1,325	60%	115	5%	52	2%	726	33%	2,218	100%
2015/16	5,089	91%	140	3%	63	1%	285	5%	4,477	100%
2016/17	2,471	73%	135	4%	71	2%	692	21%	3,369	100%
2017/18	3,411	71%	217	5%	98	2%	1069	22%	4,795	100%
2018/19	2,647	76%	197	6%	101	3%	554	16%	3,499	100%
Total	14,943		804		385		3,326		19,458	

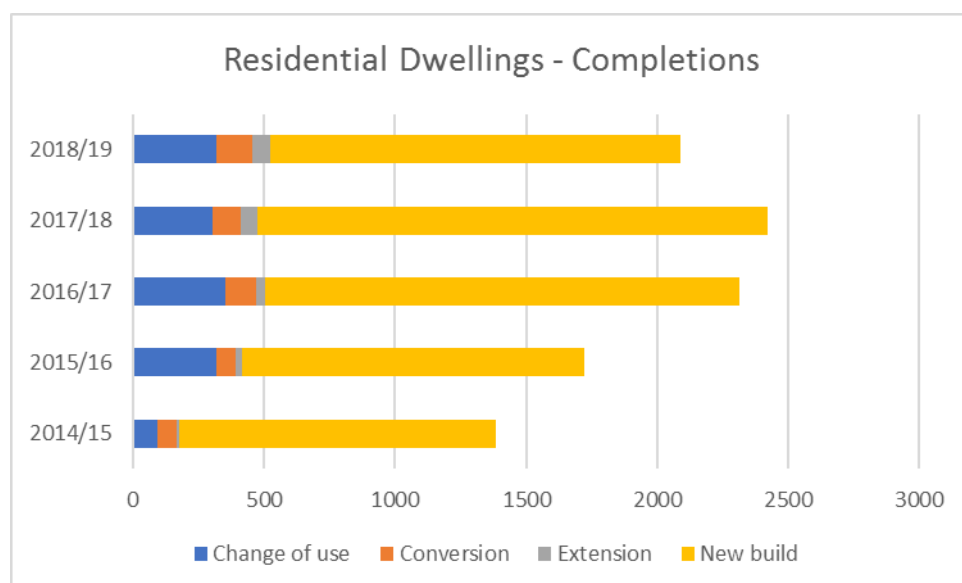


4.2.2 Analysis: on average

- New builds form the largest component of new build (74%) followed by Change of Use (19%) and 'Residential conversion' (5%)
- Dwellings formed from a change of use accounted for 20% of all new dwellings and extensions accounted for only 2%.
- The number of residential conversion approvals has remained relatively constant over the study period with very little increase (2%) in 2018/2019

Table 4: Completions by development type

	New build		Residential Conversions		Extension		Change of use		Totals	
	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units
2014/15	1,213	87%	75	5%	6	0%	93	7%	1,387	100%
2015/16	1,310	76%	74	4%	22	1%	318	18%	1,724	100%
2016/17	1,810	78%	118	5%	35	2%	352	15%	2,315	100%
2017/18	1,952	81%	112	5%	59	2%	301	12%	2,424	100%
2018/19	1,569	75%	138	7%	65	3%	318	15%	2,090	100%
Total	7,854		517		187		1,382		9,940	



4.2.3 Analysis:

- New Build have made a significant contribution to Barnet's overall housing supply and form the largest component of net additional dwelling completions in the borough, followed by Change of Use
- From 2014 until 2019, residential conversions make up an average of 5% of Barnet's dwelling completions annually.
- Over the study period, the number of residential conversion completions has increased, by 2% between 2018 and 2019.
- A total of 138 residential conversion schemes were completed over the five year monitoring period. These schemes have delivered a net total of 26 additional units in the borough.

4.3 House to flat conversion

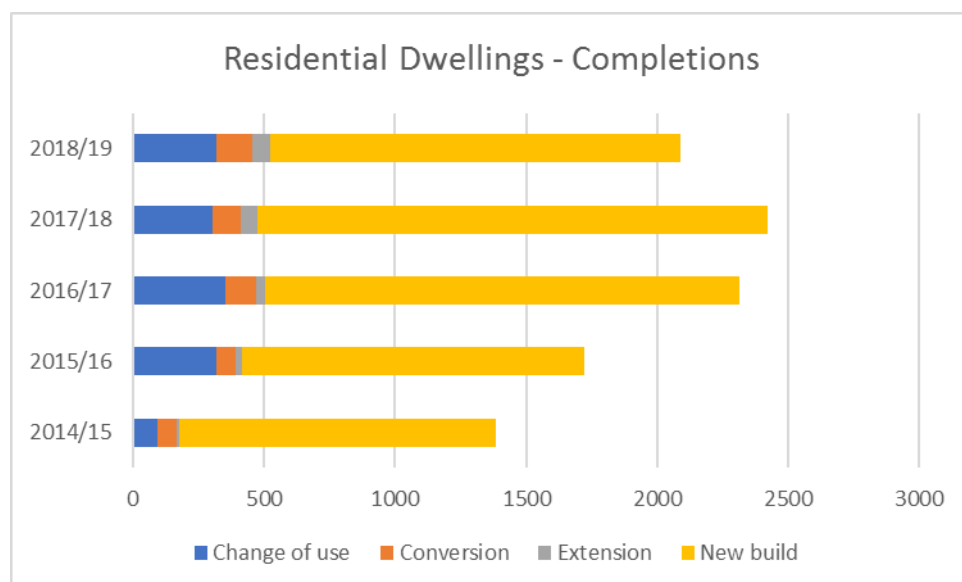
4.3.1 Conversions of Single dwellings into two or more flats is the most prevalent type of residential conversion, representing 63% of the total number of approved residential conversions in the borough, followed by flat to flat type conversions. The two other type of conversion types represent a very small component of dwelling conversions in the borough.

Figure 4: Dwelling conversion approvals 2009 – 2019

Conversion type	Total (% terms)
House to flat	63
House to house	8
Flat to house	6
Flat to flat	27

Table 4: Completions by development type 2014 - 2019

	New build		Residential Conversions		Extension		Change of use		Totals	
	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units	Net units	% of total units
2014/15	1,213	87%	75	5%	6	0%	93	7%	1,387	100%
2015/16	1,310	76%	74	4%	22	1%	318	18%	1,724	100%
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2018/19	1,569	75%	138	7%	65	3%	318	15%	2,090	100%
Total	7,854		517		187		1,382		9,940	



4.4 Geographical spread of house to flat conversions

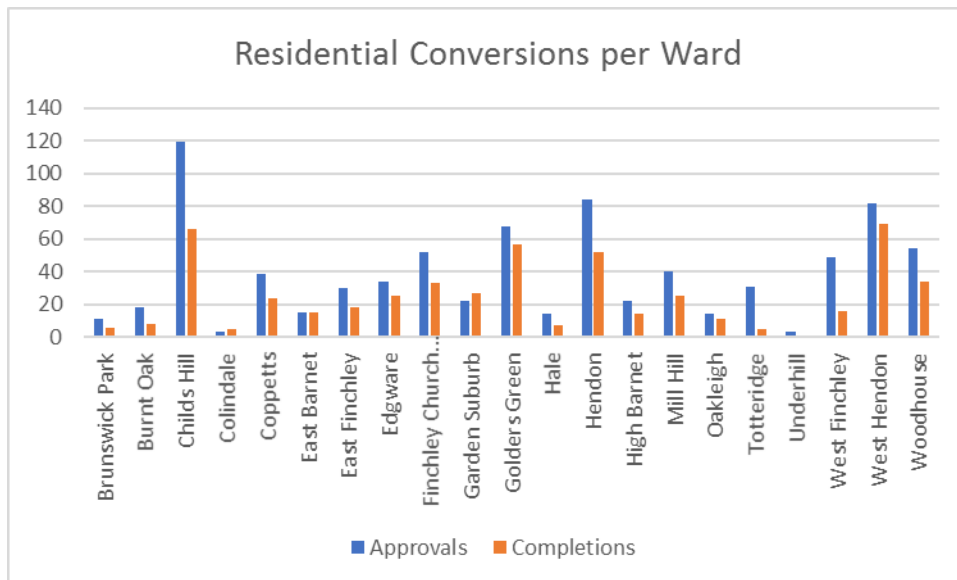
4.4.1 Figure 5 presents the total residential conversions completed and approved on a ward basis (full breakdown of the data can be found in appendix 1). It is evident that the most common areas for residential conversions are:

- Childs Hill
- Hendon

- West Hendon
- Golders Green
- Woodhouse
- Finchley Church End
- West Finchley

4.4.2 In contrast, areas such as Colindale, Hale, Underhill and Brunswick Park have had a limited number of residential conversion activity in comparison.

Figure 5: residential conversions per ward



4.5 PTAL levels:

4.5.1 Table 5 shows PTAL levels for all approved and completed residential conversions. The data shows that, generally, there is support for residential conversions in areas with higher PTAL levels, with a large proportion of approvals and completions in areas with PTAL levels between 2 – 4.

Table 5: PTAL levels (2019)

PTAL Level	Number of Units Approved	Number of Units Completed
0	6	2
1a	8	4
1b	95	56
2	236	151
3	211	147
4	142	90
5	54	36
6a	52	31

5 Future housing need and provision in Barnet

5.1 Future housing need

- 5.1.1 The London Strategic Housing Land Availability Assessment (SHLAA) has identified that Barnet has capacity to deliver 31,340 homes between 2018 up to the period 2029, equating to 3,134 houses annually.
- 5.1.2 In 2018 the Council, in partnership with the West London Alliance, commissioned a Strategic Housing Market Assessment (SHMA) consisting of two reports - a Borough SHMA for Barnet and a sub-regional SHMA for West London. This SHMA establishes the level of housing demand and the scale of housing supply necessary to meet this demand – including backlog demand from households in temporary accommodation, and those on waiting lists with an identified housing need. Barnet’s SHMA identifies the Full Objectively Assessed Need (OAN) for housing in Barnet as 3,060 dwellings per year. This equates to 46,000 new homes over the lifetime of the Local Plan.
- 5.1.3 Barnet’s SHMA has identified housing mix requirements by dwelling size and tenure type over the next five years for the Borough. This has been calculated on the basis of evidence on recent household formation, in-migration, out-migration and projected household dissolution. Table 6 sets out these requirements which will guide the mix of housing sought across Barnet and provide a basis for determining the mix of homes on individual sites.

Table 6: Housing size requirement by tenure

Unit Size	Market Housing
1 bedroom	6%
2 bedrooms	24%
3 bedrooms	40%
4 bedrooms	25%
5+ bedrooms	5%
Total Market Housing	100%
Affordable Housing	
1 bedroom	13%
2 bedrooms	43%
3 bedrooms	27%
4 bedrooms	13%
5+ bedrooms	4%
Total Affordable Housing	100%

- 5.1.4 As indicated in table 7 below, data on housing completions between 2014/15 and 2018/19 shows that Barnet has an undersupply of three and four bedroom dwellings and significant oversupply of one and two bed dwellings.

Table 7: housing size by completion

Number of Bedrooms	1 Bed	% of Source	2 Bed	% of Source	3 Bed	% of Source	4 Bed	% of Source	5+ Bed	% of Source	Unknwn	% of Source
Change of Use	877	64%	435	32%	43	3%	3	0%	6	0%	18	1%
Conversion	370	60%	329	53%	41	7%	-52	-8%	-70	-11%	-101	-16%
Extension	108	58%	69	37%	10	5%	0	0%	0	0%	0	0%
New Build	1,975	24%	3,882	47%	1,596	20%	593	7%	135	2%	-327	-4%
Total	3,330		4,715		1,690		544		71		-410	

5.2 Future housing provision

5.2.1 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 Barnet were calculated based on the number of bedrooms per dwelling to determine whether future provision will meet housing need.

Table 8: future housing provision by size

	1 Bed	% of Source	2 Bed	% of Source	3 Bed	% of Source	4 Bed	% of Source	5+ Bed	% of Source	Unknwn	% of Source
Change of use	1,651	85%	267	14%	22	1%	4	0%	2	0%	0	0%
Conversion	256	71%	206	57%	12	3%	-50	-14%	-59	-16%	-3	-1%
Extension	141	57%	82	33%	22	9%	4	2%	-1	0%	0	0%
New Build	4,169	39%	6,002	57%	2,298	22%	507	5%	58	1%	-2,415	-23%
Total	6,217		6,557		2,354		465		0		-2,418	

5.2.2 Based on table 8 above, future known housing provision in Barnet will overwhelmingly favour smaller units, with approximately 39 % of units containing 1 bedrooms and 57% containing two bedrooms. A further 22% of units will contain three bedrooms and the remaining 5% will contain 4+ bedrooms. The majority of these units will be provided through new builds.

5.2.3 This indicates that there is a small shortfall in future housing provision of two and three-bedroom dwellings and a potential oversupply of one bed units. On this basis, there is an opportunity for the emerging Local Plan to ensure that future housing needs in Barnet are met by providing the right mix of unit types and sizes.

6 Policy options

- 6.1.1 This section sets out recommendations to the Council on the policy approach that could be considered when reviewing the existing policy approach established within the Core Strategy.
- 6.1.2 The recommendations take account of the evidence that has been presented as part of this study including: the policy review, analysis of residential conversion appeals; and analysis of the past residential conversion trends within Barnet.
- 6.1.3 This section uses the evidence in section two to five of this report and expands on this evidence to consider various policy approaches to residential conversions that could be applied in Barnet.
- 6.1.4 The policy options being considered are as follows:
 - Option 1: Retention of the existing policy in its current form
 - Option 2: strengthen the existing policy approach adopted in Lambeth
 - Option 3: strengthen control over residential conversions by adopting a location approach or restricting conversions in certain areas

6.2 Current Approach

- 6.2.1 As discussed in section two, the primary objectives of the existing policy framework in Barnet is to strike the right balance between delivering the right mix of housing in terms of size and type of accommodation, with the need to protect and enhance the local character of the area.
- 6.2.2 Whilst no specific residential conversion policy is in place, other policies make reference to what is and isn't acceptable in terms of converting single dwellings into two or more flats. Policy stipulates that such proposals will generally not be accepted in areas that are characterised by houses. However, in instances where conversion proposals are allowed, they should aim to minimise any adverse impacts and adhere to the relevant space standards and parking management.
- 6.2.3 The Residential Design SPD guidance, adopted in 2016, supports policies contained within the Local Plan and provides greater clarification and expansion on the Council's approach, including criteria that residential conversion proposals must meet. The Residential Design SPD sets out how the Council considers applications for the conversion of single family dwellings into two or more self-contained units including Housing in Multiple Occupation (HMOs). The main principles regarding residential conversions are as follows:
 - conversions of houses into flats or HMOs, in roads characterised by houses will not normally be appropriate
 - consideration should be given to local character and surroundings and conversions that harm this, (due to cumulative impacts of such conversions) will be refused
 - the unit size should normally comply with Barnet's space standards highlighted in the SPD
 - usable amenity space should normally be provided for the occupiers of all units
 - consideration should be given to the necessary provision and associated activities such as car and cycle parking spaces, storage, hardsurfacing and refuse store at the earliest stage of design
 - where conversion take place, any impact on the amenity of future residents and neighbouring properties should be minimised

- 6.2.4 The analysis of appeal data (set out in section three) has demonstrated that Barnet currently has a fairly robust approach to controlling existing residential conversions, with approximately 67% of all appeals dismissed. However, when comparing against other London boroughs, it shows that Barnet’s existing policy approach could be strengthened, particularly in relation to control of the number of conversions in an area. Section four has highlighted that residential conversions are coventrated in a small number of wards.
- 6.2.5 Section five shows that the housing conversions represent a high proportion of housing completions per annum, with the borough yielding an average of 165 units per year. This is summarised in table 9 below:

Table 9: Comparison of housing conversions by housing completions 2014-2019

	Number of Conversions	Number of Completions	Percentage
2014/15	75	1,387	5%
2015/16	74	1,724	4%
2016/17	118	2,315	5%
2017/18	112	2,424	5%
2018/19	138	2,090	7%

- 6.2.6 It could be argued that conversions make a significant a very little contribution towards meeting local housing needs by increasing the supply of small size dwellings often suited to smaller households and first time buyers, as well as private rental market. However, the contribution of conversions to meet housing supply needs to be set within the context of other sources of housing supply. As outlined in section five, it is apparent that the there is a shortfall in two and three-bedroom dwellings.

6.3 Policy options

- 6.3.1 Based on the evidence gathered in Section two – four, several options for taking residential conversions have been developed. A summary of these options are provided below:

Policy Option	Summary of pros and cons
Option 1 - Retention of existing policies in their current form	<ul style="list-style-type: none"> • Retaining the existing policy would not reduce the loss of larger dwellings within the borough, which are needed to meet objectively assessed needs. • Retention of this policy may be housing choice across the borough • This approach may not take account of the cumulative effect of conversions in particular areas of the borough
Option 2 – Minor revisions to strengthen existing policy approach	<ul style="list-style-type: none"> • This policy option would provide further criteria on existing policy, which would provide more clarity on policy proposals • It is possible that this approach would give more protection to larger dwellings from residential conversions • Depending on the wording of this policy, this approach may only address some of the adverse impacts associated with residential conversions, however, it may have little effect on reducing the loss of family dwellings without the inclusion of clear thresholds or defined areas to regulate residential conversion development • Similarly, this policy may have a reduced impact on addressing the cumulative impacts associated with residential conversions without being linked to clearly defined areas or criteria.
Option 3- Adopt a locational approach to the management of conversion activity including preferred locations for conversion, restraint areas and “managed” areas i.e. areas of the borough that would appropriate mitigation may be required to accompany further conversion activity	<ul style="list-style-type: none"> • This approach would give the council greater control to manage residential conversions and help mitigate against adverse impacts associated with residential conversions • Having restraint area where residential conversions are not permitted would safeguard a greater proportion of family sized dwellings • Having preferred locations for residential conversions may change the mix and balance of communities over time, with few families likely to live in such areas • This approach may increase potential for displacement effects as additional pressure may be out on areas not identified as a restraint area

6.4 Option 1 – Retention of the existing policy in its current form

- 6.4.1 The first option is to retain the current policy unchanged. Whilst the policies contained within the Core Strategy and development management policies have been in operation for some time, the SPD (residential Design Guidance) was only adopted in October 2016. This could suggest that it is too soon to analyse and identify the effects of this document on residential conversions.
- 6.4.2 To an extent, the current policy approach has proved to be useful in terms of its operational performance, it is clear that a large proportion of new housing units come from residential conversions and the policy does not reflect some of the key issues that have been highlighted within the evidence base. In particular:
- Retaining the existing policy would not reduce the loss of single family dwellings in the borough, for which there is a need going forward.
 - It would not take full account of the cumulative effect of conversions on the local environment and character

6.5 Option 2 – Minor revisions to strengthen the existing policy approach

- 6.5.1 This approach would seek to provide further criteria and justification in order to strengthen the policy to offer protection for single family dwellings housing and to protect local character and amenity.
- 6.5.2 At present, there is no specific policy on residential conversions, however, policies contained within the Local Plan make reference to this and for the need to ensure that current policies aim to protect local character and amenity. There is also no reference to the need to protect single family dwellings. The wording around this could be strengthened within the policy justification section and also within the policy itself. If option two is to be taken forward, the Council could consider strengthening this within the existing policies or through a stand-alone policy. An example of what this policy could look like is included in appendix 2 of this document.

6.6 Option 3– adopt a locational approach to the management of conversion activity

- 6.6.1 This option would adopt a locational approach towards the management of conversion development. The two types of approach which could be viable are: preferred locations for conversions and/or restraint areas for conversions.

6.7 Preferred locations

- 6.7.1 These are locations where in principle, conversions would be permitted subject to a set of policy criteria which would be applied to residential conversion proposals. These could be defined as those areas where conversions could contribute to an increase in the mix and type of dwellings available without being detrimental to local character and amenity.
- 6.7.2 An alternative approach could be to relate this to areas that are less suited to family accommodation such as major and district town centres, properties along major roads. This approach would likely mean that the mix and balance of communities will change over time.

6.7.3 Another approach could be to define areas based on high Public Transport Accessibility Level (PTAL). This approach would have the advantage of concentrating development in areas of good transport accessibility. However, this approach would not take account of the existing concentration of conversions and other flatted development, and the existing level of single family dwellings in an area, or the existing environmental or amenity issues.

6.8 Restraint areas

6.8.1 There are certain locations within the borough which are not able to accommodate intensification of development to take place through conversion activity due to inadequate public transport provision. There are also areas where significant levels of conversion activity have already taken place in the past and where the cumulative effect of past conversions means that there is no capacity for further conversions without exceeding limits relating to local environmental capacity and amenity, the ability of an area to sustain a balanced community and paring stress.

6.8.2 Under this approach, no further conversion activity would be permitted within such an area unless it can be demonstrated that the proposed development would not have an adverse impact on the area.

6.8.3 This policy could apply on a street level and a map would be needed to define those streets included within the policy. The Council's current policy has made reference to conversion activity not being acceptable on roads characterised by homes, however the wording does not go far enough; if this policy were to be implemented, the justification would need to be clearly set out and should be a stand-alone policy within the local plan.

6.8.4 Numerous London Borough's (see Section 2) have policies that control or restrict residential conversions, the approaches used include: c identifying areas that are suitable for conversion; identifying areas that are unsuitable for conversion; or imposing a property size threshold to limit the properties that are eligible for conversion; and having a clear policy criteria to mitigate against adverse impacts of residential conversions where they are permitted.

6.8.5 Barnet's existing residential conversion policy has been reasonably successful to date at appeal. However, this policy has highlighted that there is a significant oversupply of one and two bed dwellings and an undersupply of dwellings comprising of three and four beds, which is likely to have detrimental impacts on particular areas of the borough. This is also likely to have an impact on the Council's ability to deliver they right mix of housing to suit housing needs. Therefore, the existing policy framework needs strengthening to prevent further environmental degradation. This section sets out some policy options that could be considered to prevent an oversupply of residential conversions and maintain a mixed and balanced community.

6.8.6 The study identifies three potential policy options including: Option 1 - Retention of existing policies in their current form; Option 2 – Minor revisions to strengthen existing policy approach; Option 3- Adopt a locational approach to the management of conversion activity including preferred locations for conversion, restrain areas and "managed" areas i.e. areas of the borough that would appropriate mitigation may be required to accompany further conversion activity.

6.8.7 In light of the analysis above, the study recommends that the best approach would be a combination of policy options 2 and 3, tailored to encourage mixed, balanced and sustainable communities.

6.9 Planning Policy Recommendation for the new Local Plan

6.9.1 **Managing residential conversions:** To effectively manage housing growth and ensure that residential conversions do not have a detrimental impact on local areas, the Council will only support the conversion of larger homes into smaller homes where:

- a.) It is located within 400 meters of a major or district town centre (in accordance with the town centres policy) or it is located in an area with a PTAL of 5 or more.
- b.) The gross area of a property exceeds 130m² where 2 units are proposed and 180m² where 3 units are proposed.
- c.) No significant loss of character or amenity occurs to the area as a result of increased traffic, noise and/or general disturbance;
- d.) a good standard of living conditions and amenity for future occupiers in terms of privacy, daylight and outlook;
- e.) Appropriate car and cycle parking provision are provided in accordance with the Local parking policies
- f.) Proposals meet national space standards
- g.) The conversion provides at least one larger family sized home of 74 s.qm on the ground floor with access to a dedicated rear garden of the converted home

Appendix 1

Ward	New build		Conversions		Extensions		Change of use	
	Approved	Completed	Approved	Completed	Approved	Completed	Approved	Completed
Brunswick Park	158	79	13	8	3	0	28	2
Burnt Oak	94	119	8	12	15	0	24	3
Childs Hill	700	227	138	117	55	14	204	69
Colindale	3,576	1638	-1	5	2	3	239	2
Coppetts	59	42	44	32	21	20	25	19
East Barnet	490	87	21	6	14	1	148	77
East Finchley	128	67	35	9	13	5	43	18
Edgware	605	691	21	31	20	3	73	138
Finchley Church End	333	285	78	42	19	13	380	61
Garden suburb	204	55	30	28	19	1	69	30
Golders Green	7863	64	104	76	19	1	90	64
Hale	64	51	8	7	15	18	38	42
Hendon	172	89	78	52	24	13	51	51
high Barnet	363	190	21	11	28	9	102	39
Mill Hill	1389	578	29	26	5	6	26	50
Oakleigh	191	52	25	7	41	2	587	139
Totteridge	573	161	21	2	10	6	520	127
Underhill	425	180	5	2	15	9	26	20
West Finchley	140	54	70	44	320	13	27	44
West Hendon	2966	546	81	62	9	1	151	4
Woodhouse	262	183	86	62	22	2	305	92
	20755	198	21	20	18	61	1323	483

Number of bedrooms	1 bed	% of source	2 bed	% of source	3 bed	% of source	4+ bed	% of source	5+ bed	% of source
Change of use	642	18	401	8	31	2	7	1	10	5
Conversion	500	14	454	9	89	5.3	21	5	17	9
Extension	77	2	56	1	11	0.7	0	0	0	0
New build	2317	66	4044	82	1532	92	433	94	162	86
	3536	100	4955	100	1663	100	461	100	189	100

