

# **Royal Borough of Greenwich**

## **Supplementary Planning Document**

# **Residential Extensions, Basements and Conversions Guidance**

## **Preliminary Consultation Statement**

**October 2018**

## **1. Purpose and Background**

This statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement. It accompanies a draft Supplementary Planning Document (SPD) which provides further guidance on Local Plan policies relevant to residential extensions, basements and conversions.

This statement sets out details of the preliminary consultation that has taken place which has informed the limited review of the draft guidance within the SPD relating to basements and Houses in Multiple Occupation (HMOs). The remainder of the guidance within the SPD remains unchanged. This statement provides details of who was consulted, how and when to inform the limited review of the SPD, and how the issues raised at the preliminary stage have been addressed in the draft SPD.

## **2. Preliminary Consultation**

### *Basements*

Shortly after it was adopted, the Royal Borough committed to an early review of the guidance within the Basements sections of the SPD to ensure it remained effective and up to date. A small number of letters setting out some minor concerns raised by local residents associations were received following the adoption of the Residential Extensions, Conversions and Basements SPD. Their concerns related to a number of minor discrepancies within the SPD and issues of clarification.

All seven amenity groups/residents associations who made comments on the basements guidance within their response to the 2016 consultation on the SPD and/or who submitted letters following adoption of the SPD were invited to a workshop on 21<sup>st</sup> June 2018 to provide further detail on their concerns and which areas they considered required review.

The majority of discussion focused on the need to ensure that issues of structural stability were considered by suitably qualified professionals, insofar as this issue falls within the remit of planning. Clarifications were also sought in regards to when planning permission was required for basement development, the information which should be included within Basements Impact Assessments, and at what stage in the planning process this should be provided. The guidance within the basements section has been updated accordingly.

### *Houses in Multiple Occupation (HMOs)*

The Royal Borough of Greenwich consulted on proposals to introduce an Additional Licensing Scheme for HMOs in November 2016 for a period in excess of 12 weeks. A total of 302 responses were received to the consultation with 88% of residents responding in support of the proposals and 83% of landlords and managing agents responding in objection to the proposals.

The consultation identified key issues for the Royal Borough to consider, including the proposed fees, the evidence base, ways to support landlords and agents in tackling ASB more effectively and HMO License Conditions. Following the consultation, Cabinet confirmed the introduction of an additional HMO licensing scheme, which requires all HMO properties in the borough to be licensed. HMOs in the borough must meet local standards based on room size and amenities to be granted a license.

Notice of a non-immediate Article 4 Direction removing permitted development rights for conversions of dwellinghouses (use class C3) to small HMOs occupied by between three and six unrelated people (use class C4) was published on 27 September 2017 and was the subject of public consultation for 4 weeks, on the Council's website, via local advertisement, site notices and a targeted mailshot to letting agents, known landlords and local amenity groups.

Fourteen responses were received to the consultation; 3 having no comment, 10 in support, although several were seeking earlier confirmation, and 1 objection. Cabinet confirmed the direction in June 2018, and the Direction will come into force on 27 September 2018. Responses to both consultations have informed the new guidance for HMOs contained within the final draft SPD for consultation, and the guidance reflects the requirements of the additional HMO licensing scheme in operation in the borough.

### **3. Next Steps**

This consultation statement will be updated following formal public consultation on the draft SPD. A full consultation statement detailing work undertaken and responses received at both preliminary consultation and full consultation stages will be published alongside the final Residential Extensions, Basements and Conversions Guidance SPD.