

# WALTHAM FOREST LOCAL DEVELOPMENT FRAMEWORK

## DWELLING CONVERSIONS – INTERIM PLANNING POLICY DOCUMENT

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### CONSULTATION STATEMENT

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**Spatial Planning  
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## Introduction

- 1.1 The UDP was adopted on 30 March 2006. Under the new planning system introduced by the Planning and Compulsory Purchase Act 2004, changes to existing UDP policies can only be made through the Local Development Framework (LDF). The Waltham Forest LDF Core Strategy, which is the key foundation document, is not scheduled for adoption until July 2010. However, in response to comments during the consultation on the Sustainable Community Strategy, an up to date policy is required to guide dwelling conversion development in the borough until the new LDF policies are in place.
- 1.2 Under Section 38 of the Planning and Compulsory Purchase Act 2004 (the 'Act') the policies in the UDP are automatically 'saved' for a three-year period ending on 30<sup>th</sup> March 2009. The Act makes provision for Local Planning Authorities to apply to the Secretary of State to make a direction to save specified policies and proposals beyond this date until they are replaced by a relevant document from the Waltham Forest Local Development Framework (LDF). Accordingly, the Council has reviewed its existing UDP policies and proposals against criteria issued by the Department for Communities and Local Government for saving existing policies.
- 1.3 The Council considers that UDP Policy HSG 12 does not adequately reflect the requirements of the borough's 2008 Sustainable Community Strategy, which aims to limit the conversion of flats and houses in multi-occupation. Accordingly, the Council has applied to the Secretary of State to delete Policy HSG12.
- 1.4 The Interim Planning Policy (IPP) document therefore clarifies and updates the Unitary Development Plan (UDP) policy relating to the conversion of dwelling houses into self-contained flats.
- 1.5 The IPP document relates to Policy HSG 9 in the adopted Waltham Forest UDP. The policy states **"When considering proposals for new residential developments, the Council will encourage the provision of a range of dwelling sizes and types for both family and non family households"**.
- 1.6 The planning system requires Local Planning Authorities to engage the community in shaping places, in particular, when producing Local Development Frameworks (LDF) and making planning decisions. Government guidance sets out the minimum requirements on public participation to ensure the involvement of people. Local Planning Authorities are called upon to apply the most effective way of enabling people to contribute to the LDF production process.

## **Consultation procedures**

- 1.7 The IPP document has been prepared in accordance with the process for preparing Supplementary Planning Documents (SPDs) - as specified by the Town and Country Planning (Local) (England) Regulations 2004.
- 1.8 The Regulations set out the full list of local and national organisations that must be consulted in preparing LDF documents – including SPDs. Local Planning Authorities are to decide which of these might be affected by the SPD document and provide appropriate opportunities and methods for their views to be taken into account.
- 1.9 Background evidence supporting the preparation of this IPP document comes from the consultation work undertaken on the Sustainable Community Strategy (SCS). From January to March 2008, there were 25 public and community events engaging with over 2,500 residents and stakeholders. The Council and its partners (such as the Police and Health Services) held discussions with residents and stakeholders about the opportunities, challenges and choices that face the Borough. Community Council meetings hosted discussions about key issues and a series of roadshows were held in the borough's town centres.
- 1.10 From other community engagement activities undertaken, the Council received over 400 entries to the 'postcards to the future' prize draw. In addition, a survey of 1,100 people on the Residents' Panel was undertaken. A further survey of more than 1,000 young people on the Young Voice on-line panel was also undertaken. There were visits to schools across the Borough to talk with students. The Council also interviewed businesses and held discussions with randomly selected local residents in a series of day-long consultation events. These events were supported by Ipsos MORI, an independent research organisation.
- 1.11 One of the key concerns raised from the SCS consultation work, related to the availability of affordable family homes and the number of homes converted into flats. With the SCS consultation work providing the background justification for developing the new Dwelling Conversions policy, the Council moved straight towards the preparation of a draft document for public consultation. The Council however also considered other key supporting evidence from the London Development Database and the Council's Annual Monitoring Report.
- 1.12 In accordance with the Council's adopted Statement of Community Involvement, a notification letter was sent out to key local stakeholders (including partner organisations, landowners, businesses, community representatives and residents groups) advising consultees of the draft IPP, Sustainability Appraisal Report, consultation period dates, and information on how to obtain a copy of the draft IPP. The consultation period was from 10 June to 8 August 2008.

- 1.13 Hard copies of the draft IPP and Sustainability Appraisal Report were posted to specific/statutory consultation bodies. Both documents were published on the Council's website and copies made available for inspection at the Waltham Forest Town Hall, all Waltham Forest Libraries and Waltham Forest Direct shops. Further information was published in the Council's newspaper - Waltham Forest Magazine (Wfm) on 9 June 2008 and again on 23 June 2008. This free magazine is a fortnightly publication with circulation of over 110,000. It is distributed to every household within the borough.

### **Consultation responses**

- 1.14 Responses to the consultation were received from 20 respondents, providing a total of 74 submissions. Submissions were received from a range of groups including government bodies, a resident's association, private consultants and individuals.
- 1.15 Respondents were broadly supportive of the policy. Comments mainly related issues to:
- Concerns over how and if the proposals would be enforced.
  - Omissions relating to issues around public transport.
  - Questions relating to the impact this IPP would have on ensuring the borough's housing needs and housing targets are met. Concerns were raised on the impact the IPP would have on housing affordability and the creation and maintenance of a mixed community.

### **Response to issues raised from the consultation**

- 1.16 In response to these concerns the following amendments/observations were made:
- A section outlining the Council's proposed means of enforcement has been included in the IPP.
  - The section relating to public transport has been revised to incorporate references to the Council's public transport commitments, ensuring the incorporation of and conformity with the commitments in the London Plan.
  - Concerns relating to housing need, affordability and balanced/mixed communities were justified with strong reference from Housing Needs and Market Survey mentioned under paragraph 1.5 of the document.

## **Schedule of Representations and the Council's Response**

- 1.17 A Schedule of Representations and the Council's Response is attached as Appendix I. The report contains a summary of all representations received during the consultation period – 10 June to 8 August 2008. It also contains the Council's response to these representations and, where necessary, the changes made to the draft document. The adopted version incorporates all the changes identified in the schedule.

## **Adoption**

- 1.18 On 25 November 2008, having considered all of the responses and officers suggested amendments, the Council passed a resolution to adopt the Dwelling Conversions Interim Planning Policy Document. With the adoption of the IPP document, planning applications for conversions are being considered in the light of UDP Policy HSG 9 together with the Interim Planning Policy on Dwelling Conversions.

Appendix 1 - Dwelling Conversions Interim Planning Policy - Schedule of Representations and the Council's Response

Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
1.2	Lesley Worstencroft	Individual	No confidence that any new regulations will be enforced. There have been a number of developments in the Borough that are illegal and should have been the subject of a prosecution but have been allowed to remain.	Noted. As the provisions of this policy document have a borough wide impact, it may not be practical to undertake frequent surveys to ensure widescale compliance. That said, the council operates an enforcement system which actively encourages the community to highlight any breaches to council planning policies. The council will continue to rely on this system and will endeavour to strengthen community awareness, participation and encourage community ownership of the policies within this document to reduce the need for enforcement and to encourage compliance. The council planning enforcement team will aim to acknowledge and register complaints within 5 working days and investigate breaches of policy based on a prioritisation system. Serious breaches will be dealt with in 1 day while those causing less harm will be investigated within 10 - 20 days of receiving a complaint. The Council accepts however that enforcement should specifically be addressed within the document.	Add new section to chapter 3 Monitoring and Review -Heading: "Enforcement" Text:" The council operates an enforcement system which actively encourages the community to highlight any breaches to council planning policies. The council will continue to rely on this system and will endeavour to strengthen community awareness, participation and encourage community ownership of the policies within this document to reduce the need for enforcement and to encourage compliance."
1.2	Mr Barry Coidan	Individual	It is vitally important that the policy is rigorously enforced. Is there any possibility of using the communities themselves to help enforce this policy? For example as an agenda item for Community Council meetings.	Noted. (See response above). Further, there is already a regular segment in the existing Community Council meetings, known as the "Community Forum", which provides an "open floor" opportunity for residents to raise any local issues or concerns. During this session, the public can raise issues relating to enforcement and these concerns will be passed on to the planning enforcement team to investigate. Lastly, the council will continue to promote its enforcement services through the borough's local paper - Waltham Forest Magazine.	Add new section to chapter 3 Monitoring and Review -Heading: "Enforcement" Text:" The council operates an enforcement system which actively encourages the community to highlight any breaches to council planning policies. The council will continue to rely on this system and will endeavour to strengthen community awareness, participation and encourage community ownership of the policies within this document to reduce the need for enforcement and to encourage compliance."
1.3	Howard J Green (FRICS)	Individual	No matter what alterations are made as a result of public consultation, the IPP can only be seen as an effort to stop any further conversions within the borough.	This document responds to evidence of an increasing number of conversions across the borough, the cumulative effect of which has resulted in the need for policy intervention. The policy does leave room for flexibility, encouraging conversions which meet the appropriate standards and which are suitably located.	No change

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Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
1.4	Bob Bennett	Town Planning & Regeneration	Policy HSG9 referred to in the document states that the council will encourage "... a range of dwelling sizes and types for both family and non-family households". Furthermore, Para. 3.56 of the UDP specifically makes reference to the "increasing need for homes for single person households". It is disingenuous to quote only part of policy HSG9 in support of this guidance.	Only a part of the policy was referenced to highlight the objectives in the existing policy which this policy document seeks to directly address. Recent evidence from the Housing Needs and Market Survey (2007) has highlighted an under provision of family housing in the borough. This guidance aims to address this under provision by ensuring the retention of existing family size dwellings as a means to ensure a balanced provision of a range of dwelling sizes and types is achieved. This too is mentioned in para. 3.56 of the UDP.	No change
1.5	Bob Bennett	Town Planning & Regeneration	No evidence is provided to support the assertion that there is a shortage of family sized housing in the borough. This would be surprising since the borough is dominated by 3 bedroom family housing. There may be a demand for affordable and more specifically, social housing in family sized units, this is caused by high house prices and restrictions on public funding for social housing rather than a shortage of family sized dwellings. This is confirmed by table 3.2 of the UDP which shows a considerable difference between the demand for social rented housing and that for intermediate housing. By comparison, the demand for intermediate housing is for one/two bed housing which is provided by flat conversions. A more restrictive policy will reduce the supply of intermediate housing.	These statements are supported by robust evidence from a recent Housing Needs and Market Survey (2007) which highlighted a major requirement for family sized units in both the market and social housing sectors. With regard to the intermediate housing market, the survey highlighted that the greatest demand is for 2 and 3 bedroom properties. The findings of this report supersede the findings of the previous survey data which informed the production of table 3.2 in the UDP. This report will soon be made available for public viewing on the council's website.	No change

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Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
1.6	Bob Bennett	Town Planning & Regeneration	No evidence is provided to support that flat conversions increase pressures on street parking. Occupiers of flat conversions are much less likely to own a car than occupiers of family housing.	Flat conversions result in more households occupying the building. More often than not, as a result of this, there will be an increase in car ownership. According to the Office of National Statistics "Car ownership is related to household income". Conversions, increasing the number of households, directly increases the likelihood of more places with household incomes able to afford and choosing to own a car. Further, an assessment of responses to public consultations responding to planning applications for conversions around the borough reveal high proportions of objections on the grounds of the impact conversions already allowed have had on increased on-street parking. On a regional level, the relationship between car parking and house conversions is further recognised in the Mayor of London's Housing Supplementary Planning Guidance - Housing. Considered together, this evidence is considered sufficient to quantify the statement relating to increased pressures on the road system due to conversions.	No change
1.7 and 1.8	Bob Bennett	Town Planning & Regeneration	No evidence is provided to state that flat conversions are having an adverse impact on housing mix and choice. Flat conversions help meet the demand for low cost housing. Such properties and their residents make a positive contribution to the social mix of the borough - meeting PPS3 objectives for a mix of communities and wide variety of housing.	The Housing Need and Market Survey(2007) highlighted the need for family dwellings, which are less commonly proposed as part of new build developments. Flat conversions exacerbate this problem as they result in the further depletion of the existing stock of larger family sized homes in the borough. This Interim planning policy aims to ensure future conversions which occur are sustainably managed, appropriately located and provide a good standard of accommodation, fit for future occupiers.	No change

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Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
1.8	Howard J Green (FRICS)	Individual	Suggests that by totally prohibiting flat conversions this interim policy would be contrary to the London Plan Policy 3A.5: Housing choice and would prohibit the creation of mixed communities in accordance with PPS3.	This policy does not prohibit conversions. The London Plan requires Local Authorities to look at the promotion of mixed communities by taking account of changes in household characteristics and lifestyles and by offering a range of housing types and sizes. Conversions contribute to the boroughs stock of smaller residential units; much of this stock is also provided for by the market, particularly through new build housing schemes. The policy only completely restricts further conversions in areas with already high concentrations of conversions, hence, already higher proportions of smaller housing types and sizes. The policy therefore seeks to maintain a balance of smaller and larger units, thereby encouraging the creation of mixed communities. This therefore satisfies London plan Policy 3A.5.	No change
2.1	Howard J Green (FRICS)	Individual	Mayor Boris Johnson recently stated that he wants all new residential development to be built to the old Parker Morris standards. Raising minimum requirements for single and double bedrooms and ALSO introducing a minimum total area for cooking, eating and living rooms could prove impossible to comply with in conversion schemes. Are you going to bring in these new minimum standards for residential new build?	Revised guidance from the mayor relating to space standards is yet to be produced. Local planning policies must be in line with the adopted regional planning policies in the London Plan which highlights as stated in para.2.10 of the Dwelling conversions interim planning policy draft, that "new buildings should ensure the highest possible space standards for users".	No change
2.1 and 2.4	Bob Bennett	Town Planning & Regeneration	Whilst flat conversions may best be suited in some locations than others, the guidance would effectively prevent conversions taking place anywhere in the borough	The guidance aims to control conversions in areas where they have been found to be unsustainable and unsuitable. That said, there are suitable properties across the borough which meet the criteria outlined in the policy and which would provide good quality, appropriately located and more sustainable conversions.	No change
2.2	Bob Bennett	Town Planning & Regeneration	The shortage of affordable family sized units is a result of the very large increase in housing prices over the years and nothing to do with the number of conversions in the borough. Banning flat conversions in large parts of the borough will do nothing to increase the supply of affordable family sized housing. No evidence is provided to support the assertions in this paragraph.	Housing affordability is directly related to housing supply. Where the supply of housing is reduced, as is the case here with larger, family housing being converted into smaller properties, this results in a reduced supply of such housing. With less family sized properties available, property prices for such units increase. In this context, by reducing the levels of family units lost to conversions, the Council can safeguard to some extent, the level of affordable family sized housing.	No change

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Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
2.2	Mr Barry Coidan	Individual	Is it possible to give details of the loss of family homes as a result of conversions since the base year 2003. My own personal research when preparing an appeal against a planning application identified a significant number of examples.	Between April 2003 and March 2008, 1564 conversions were given planning permission in the borough, while 975 conversions were completed. It should however be noted that these figures only reflect the number of conversions which have been done legally and have gone through the planning system. The actual number of conversions in the borough over this period is likely to be greater than this figure, considering that there are some conversions in the borough which have been done illegally. In such cases, the Council continues to rely on its enforcement service to weed out such illegal conversions to ensure the council's planning policies are complied with.	No change
2.4	Bob Bennett	Town Planning & Regeneration	The effect of this policy would be to virtually prevent any conversions taking place in the borough	Where conversions are considered to be of a high standard and appropriately located, they may still be allowed.	No change
2.4	Bob Bennett	Town Planning & Regeneration	Conversions are being completely banned in the part of the borough with the largest supply of properties suitable for conversion and best located in terms of public transport and local shopping centres.	Although some of the restricted areas hold properties which are physically suited to conversion, recognition that a lot of these have already been converted, leaving fewer numbers of larger, family homes, has led to the need for this restriction to ensure we maintain a balanced mix of dwelling sizes in such areas. However, the policy will be reviewed as part of the wider LDF process.	No change
2.4	Bob Bennett	Town Planning & Regeneration	Most of the housing in the borough is below 120sqm. The few places likely to have suitable housing are in wards where the cost of purchasing such housing is likely to make the flat conversions uneconomical	Comment noted. Properties which do not meet this standard are not considered adequate for conversion. It is recognised that flat conversions are not the only mechanism available to ensure the borough's range of housing needs are met. Considered alongside the Council's strong commitments to ensuring the provision of affordable housing in the borough (issues to be addressed in other emerging policy documents in the LDF), the economic impact of this policy is considered minimal.	No change
2.4	Bob Bennett	Town Planning & Regeneration	The concentration criteria is excessive, restrictive and impossible to monitor (is it 200m as the crow flies?)	The 200m criteria refers to "as the crow flies". The council planning department has in place, tools which allow the monitoring of such criteria to ensure applications are assessed based on this remit. It is considered that within such proximity, the potentially adverse impacts that conversions may have on amenity and on the character of an area can be adequately managed .	Explicitly note that the 200m refers to "as the crow flies".

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2.4	Bob Bennett	Town Planning & Regeneration	The requirement for a 2-bedroom unit on the ground floor is over restrictive and does not take account of the individual circumstances and layout of the original house.	With priority being placed on the need to retain family housing, the requirement for 2-bedroom units on the ground floor seeks to ensure adequate provisions are made for smaller families within any proposed conversions, in particular the need to provide direct access to the garden - highlighted in para. 2.13.	No change
2.4	Bob Bennett	Town Planning & Regeneration	The requirement for off street parking would not reduce the demand for on street parking since the construction of a cross over would result in the loss of an on street parking space.	Provision of off street parking has the added benefits of alleviating parking congestion on the streets, ensuring that there are less problems with traffic movements, encouraging public safety and promoting a more pleasant living environment. Although the point raised in this objection is fully noted, it is necessary to understand and capture the broader role of this aspect of the policy which targets more holistically, the issues around on street car parking. .	No change
2.4	Bob Bennett	Town Planning & Regeneration	The requirements would result in the paving over of front gardens which is visually unsatisfactory and contrary to government policy to reduce water run off from hard surfaces	"appropriate" parking car parking spaces off street should not necessarily be translated to suggest that planners will encourage the loss of front gardens.	No change
2.4	Howard J Green (FRICS)	Individual	The prohibition on conversions within 200m of another conversion is ludicrous	The 200m criteria refers to "as the crow flies". The council planning department has in place, tools which allow the monitoring of such criteria to ensure applications are assessed based on this remit. It is considered that within such proximity, the potentially adverse impacts that conversions may have on amenity and on the character of an area can be adequately managed .	No change
2.4	Mr Terry Hines	Individual	I agree with this in order to improve areas where conversions have led to parking problems and no one taking responsibility for the shared external spaces. Front and rear gardens should be attached to the ground floor flat so that the areas are maintained by the occupier of the ground floor. If you are wanting two bedrooms on the ground floor of a conversion then there must be a minimum size requirement otherwise the bedrooms will not be of a usable size.	Noted	No change

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2.4	Ms Usha Parmar	Individual	Agree this approach although there seems to be an underestimation of the impact on services like recycling and refuse collection and the means to cite bins/boxes - the nature of complaints on this matter would indicate this. Also could there be a criteria around the maintenance and upkeep of converted dwellings in particular front of property/ garden appearance - all this influences the look and feel of a location and perception of safety.	Paragraph 2.20 provides guidance relating to the council's approach to recycling and refuse collection. The onus is on the property occupier to maintain and upkeep the front of their property. By ensuring that provisions are made for storage of waste and litter, this issue is addressed as far as can be facilitated within the planning remit.	No change
2.4	Patricia Moore	Individual	Yes you should increase social and privately rented housing. It is vital that conversions are only agreed subject to strict criteria. They should work on the basis that only well thought through environmentally & socially aware plans are submitted together with the proviso that materials and labour will be of good quality. I'm not sure I understand the rationale behind the ban on conversions when in a number of cases they would provide a simple solution to various housing issues.	Noted. The rationale behind the restrictions of conversions in some wards is based on evidence showing very high concentrations of conversions in these areas. The need to maintain and promote mixed communities and to ensure there is provision for larger family size units, has meant that in areas with already high numbers of smaller units resulting from the conversions, further conversions have had to be restricted.	No change
2.4	Simon Munk	Individual	Agree strongly on these criteria - really glad to see them.	noted	No change
2.6	Bob Bennett	Town Planning & Regeneration	The effect of this policy would be to locate any conversions that do take place, in areas which are least accessible in terms of public transport and local services. In terms of sustainability, the best locations for flat conversions are in the "pedshed" areas referred to in policy HSG5 of the UPD - the majority of which are now in the "banned" zone.	It is accepted that some parts of the restricted zones in the south of the borough are in close proximity to good public transport, shops and services however, the over concentration of conversions in these areas to date makes it unsustainable to encourage any more in these areas.	No change
2.4 and 2.11	Bob Bennett	Town Planning & Regeneration	The requirement that there should be no loss of garden or outdoor space for car parking contradicts the requirements for off street parking in Para. 2.4	The guidance aims to control conversions in areas where they have been found to be unsustainable and unsuitable. That said, there are suitable properties across the borough which meet the criteria outlined in the policy and which would provide good quality, appropriately located and more sustainable conversions.	No change

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2.6	Howard J Green (FRICS)	Individual	Reference to fig. 6.3: PTAL Map in the UDP shows that three areas with the highest PTAL's in the borough (where conversions should be encouraged) are within the restricted conversion areas. Para. 2.6 of the IPP is contradictory and illogical.	It is perhaps on this basis that in the past, we have allowed that many conversions to occur in some of these restricted zones. We have however now reached a limit in some of these highly accessible areas, to the point where the conversions are now putting other social and environmental objectives at risk. Stronger management is therefore required in these areas, hence the restricted zones. To manage sustainable development of conversions, areas outside these restricted zones the council will exercise a more lenient approach in those areas outside the restricted zones.	No change
2.6	Mr Barry Coidan	Individual	Doesn't this conflict with 2.4 where two of the areas (Hoe Street and High Street) with a prohibition on the conversion of family homes are convenient to shops and services and within the town centre. I would suggest that 2.6 is looked at again. Read with 2.4 it certainly is confusing and could lead to disputes about policy priorities.	There is already an over concentration of conversions within the 8 restricted wards and there are strong grounds to prevent further conversions in these areas. However, in other wards, conversions should still be concentrated in areas conveniently located with good access to shops and services. Para. 2.6 seeks to confirm this general objective.	No change
2.7	Bob Bennett	Town Planning & Regeneration	The requirements in this paragraph are superfluous since the 200m proposed separation distance will have the same effect	Para 2.7 provides the considerations which specifically relate to the character of an area. The 200m separation distance does not cover urban design issues hence it is necessary to include para. 2.7.	no change

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2.7	Howard J Green (FRICS)	Individual	is there evidence to prove that conversions do increase on-street parking to support the statement in Para. 2.7?	Flat conversions result in more households occupying the building. More often than not as a result of this, there will be an increase in car ownership. According to the Office of National Statistics "Car ownership is related to household income". Conversions, increasing the number of households, directly increases the likelihood of more places with house hold incomes able to afford and choosing to own a car. an assessment of objections from the public following consultations on proposals for house conversions reveals a high proportion of objections related to the increased on street parking resulting particularly in areas which over the years have had large numbers of conversions. The mayor of london in his Housing Supplementary Planning Guidance - Housing, further references the relationship between car parking and house conversions. Considered together, this evidence is considered sufficient to quantify the statement relating to increased pressures on the road system due to conversions.	No change
2.8	Bob Bennett	Town Planning & Regeneration	The statement that conversions have a negative impact on climate change and sustainability cannot be justified. Since conversions invariably require building regulation approval, the required energy saving measures make converted flats more energy efficient than the original house and most existing family housing.	Many forms of development have an impact on climate change. In the case of house conversions, though such impacts may be minimal, the cumulative impact can make a substantial contribution to climate change. Planning as a sector aims to reduce any adverse impacts any form of development may have on climate change. That said, to clarify, the text will be reworded.	Reword text to state "...ANY negative impact the conversion could have on climate change..."
2.8	Howard J Green (FRICS)	Individual	The Code for Sustainable Homes - does this not relate to new build rather than conversions? Is it not the Breeam EcoHomes that would apply? Have you taken advice from a specialist to make sure this criterion could be complied with? Would you have staff resources to check compliance on every application?	The Code for Sustainable Homes only applies to 'new builds' and does not apply to conversions as these are defined as 'material changes of use'. The Council is therefore not able to enforce compliance with the Code for Sustainable Homes as it relates to dwelling conversions. However, in light of the climate change agenda, the Council will support applications that exceed the mandatory Building Regulations standards.	Amend paragraph 2.8 as follows, " Since the adoption of PPS: Planning and Climate Change - Supplement to PPS1 (December 2007), climate change is a major material consideration when determining planning applications. In light of this, the Council will support applications for conversions that exceed the current Building Regulation standards relating to resource conservation and attain at least a 'Level 4' Code for Sustainable Homes standard. Compliance with this higher standard will reduce any negative impact the conversion could have on climate change and sustainability. For further details on the Code for Sustainable Homes please visit the Communities and Local Government website <a href="http://www.communities.gov.uk">www.communities.gov.uk</a> . "

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2.8	Howard J Green (FRICS)	Individual	is this going to result in a higher standard of sustainability being required in flat conversions as opposed to new build?	The Code for Sustainable Homes only applies to 'new builds' and does not apply to conversions as these are defined as 'material changes of use'. The Council is therefore not able to enforce compliance with the Code for Sustainable Homes as it relates to dwelling conversions. However, in light of the climate change agenda, the Council will support applications that exceed the mandatory Building Regulations standards. The Code for Sustainable Homes will be the guiding tool for assessing the environmental performance of new build developments. The Council's required standards for such properties will be outlined in other documents to be produced as part of the Local Development Framework at a later date. In principle however, New build properties will be required to meet much stricter energy efficiency standards than conversions.	No change
2.8	Howard J Green (FRICS)	Individual	Are you proposing to introduce an interim policy to update your new build policy?	Although an interim policy for new build is not proposed, Sustainability and Climate Change issues in regard to new build properties will be addressed at a later stage in the relevant emerging LDF policy documents.	No change
2.9	Graham Saunders, Senior Regional Planning Advisor	English Heritage	Support the approach to conversions in conservation areas however, no reference has been made to the impact of conversions close to the boundaries of designated conservation areas. Occasionally, the locality of the conversion could still have an impact upon the setting of a conservation area. No reference has been made to the impact of conversions upon other heritage assets such as Registered Parks and Gardens, archaeological designations or other non-statutorily protected features of heritage significance e.g. locally listed buildings.	Noted. National Guidance outlined in PPG15 - Planning and the Historic Environment states that "The desirability of preserving or enhancing the area should also, in the Secretary of State's view, be a material consideration in the planning authority's handling of development proposals which are outside the conservation area but would affect its setting, or views into or out of the area." Paragraph 4.14). In this context, the point raised here is valid and will be addressed in the document.	1) Insert new paragraph above paragraph 2.9 to state - "Occasionally, proposals for conversions in areas outside of designated conservation areas or in close proximity to locally listed buildings, registered parks and gardens, archaeological designations and other non -statutorily protected features of heritage significance, may have an impact on the setting, character and appearance of such areas/buildings. To ensure the preservation and enhancement of both the historic environment and heritage assets, consideration will be had to the impact of proposals on the surrounding historic environment". 2) Change title of section, above paragraph 2.9 to read "Conversions and the historic environment".
2.9	Bob Bennett	Town Planning & Regeneration	Agree with this approach unless the council decides to include large areas of conventional housing in conservation areas	Noted	No change

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2.9	Mr Terry Hines	Individual	Action should be taken to prohibit the use of PVC windows in conservation areas and to replace those that have been installed.	This issue relates to considerations beyond the scope of the Dwelling conversions Interim planning policy. Other policies within the existing Unitary Development Plan (2006) deal with these considerations. The emerging LDF will also address this point.	No change
2.10	Bob Bennett	Town Planning & Regeneration	Generally support the revised space standards although exceptions must be acceptable where e.g.. room sizes of existing double bedrooms do not meet the space standards but the converted flat otherwise provides a high standard of accommodation.	Point noted	Insert new text after paragraph 2.10 (after tables) to read - " The Council accepts that in converting properties, there may be constraints and exceptional circumstances which may impede the full application of these space standards. Where the developer can clearly demonstrate that this is the case, such issues will be taken into consideration and the Council will use its discretion in applying these space standards where the overall proposed property will provide a high standard of accommodation.
2.10	Howard J Green (FRICS)	Individual	SPG note 1: Residential Development refers to a double bedroom having a minimum area of 11sqm and single bedrooms 6.5sqm whereas you are proposing 12sqm and 7sqm respectively for flat conversions. Why is this higher and are you going to bring in an interim policy for new residential development?	The standards in the policy document reflect more up-to-date room standard guidance provided. The Council is in the process of producing new planning policy documents which form part of a folder of documents know as the Local Development Framework. As part of this, older SPG's, including SPG note 1, will be revised to bring them up to date.	No change
2.10 and 2.17	Howard J Green (FRICS)	Individual	Reference back to the schedule in Para 2.10 shows that a seven person flat should have a minimum area of 105sqm. On the basis that most small family houses in Waltham Forest comprise three bedrooms and could accommodate a minimum of six persons, I do not see how you could justify that "small family dwelling houses" should by definition have an internal floor space of 120sqm. The old parker Morris Standards for a six person house was 1,050sqft (97.5sqm) I do not see a case for raising the present threshold from 105sqm.	Times have moved on since the original parker Morris standards and family sizes and requirements have also changed over time. In the interests of ensuring the provision of suitable housing for current and future generations, the Council has decided to adopt 120sqm as the minimum standard. The 120 sqm minimum is applied successfully in other parts of London. A converted 7 person dwelling will be adapted to minimise the amount of floor space lost to corridors, passageways and other dead space and would therefore be a more efficient layout. In this context, these figures are not comparable and the larger area relates to the character of existing buildings across the borough.	No change

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Chapter/ Paragraph No.	Commenter Name	Individual/ Organisation	Respondents' Comments	Council Response	Final changes
2.10 and 2.17	Howard J Green (FRICS)	Individual	Since a small family house would normally be taken to accommodate a max. of six people on the basis of your figures in para.2.10, there is a case for lowering the threshold to either 92sqm (as set out in the schedule in para.2.10) or the old Parker Morris standard of 97.5sqm.	Times have moved on since the original parker Morris standards and family sizes and requirements have also changed over time. In the interests of ensuring the provision of suitable housing for current and future generations, the Council has decided to adopt 120sqm as the minimum standard. The 120 sqm minimum is applied successfully in other parts of London.	No change
2.11	Giles Dolphin	Greater London Authority (GLA)	TfL welcomes the use of PTALS in determining parking provision however, para.2.11 should be expanded to refer specifically to the maximum car parking standards set out in Annex 4 of the London Plan rather than just referring to the standards adopted by the borough. Car-free housing should be considered where appropriate. The parking needs of motorcyclists and disabled motorists should also be considered in line with the London Plan (London Plan - Annex 4, para.3.C.23, 3.C.24)	agreed	1) Replace the existing sentence in paragraph 2.11 which states..."For further details..." with - "Regard will be had to the borough's adopted Car Parking Standards outlined in Appendix 1 of the UDP and the maximum car parking standards set out in Annex 4 of the London Plan. 2) Insert new paragraph after para. 2.11, stating - " In areas where Controlled Parking Zones apply, car free developments may be considered. For further details, see the UDP policy TSP7" 3)Development proposals should, where necessary, have regard to the needs of disabled motorists, motorcyclists and cyclists.
2.11	Giles Dolphin	Greater London Authority (GLA)	Advice on cycle parking provision has been omitted. To encourage cycling, TfL recommends that the document include a commitment to minimum cycle parking standards in line with the London Plan. Secure, accessible weatherproof cycle parking should be provided at all dwelling conversions in line with TfL cycle parking guidelines (at least 1 space per residential unit). Where possible, cycle parking provision should be integral to the building. (London Plan - para. 3C.3, 3C.22)	Noted.	Insert new paragraph below 2.11 to state - " Under the Council's Cycling policy within the UDP (TSP 5), we seek to ensure the provision of 1 cycle space per unit in all conversions. Further details on these standards can be found in the UDP Appendix 2 - Cycle Parking Standards.
2.11	Gerhard Weiss	Individual	There is no reference to bicycle parking/storage in the document. Whilst I accept the required minimum provision of one space per dwelling as set out in the UDP this is all too often not enforced by the council. The quality and standard of cycle parking spaces should be prescribed in more detail.	agreed	Insert new paragraph below 2.11 to state - " Under the Council's Cycling policy within the UDP (TSP 5), we seek to ensure the provision of 1 cycle space per unit in all conversions. Further details on these standards can be found in the UDP Appendix 2 - Cycle Parking Standards.

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2.11	Howard J Green (FRICS)	Individual	"...the loss of garden/outdoor space for car parking is unacceptable" contradicts the new policy which states that "conversions will not be permitted where appropriate car parking spaces cannot be provided off street"	These two issues are not contradictory. Off street parking need not necessarily be provided in the front garden. An existing driveway for example, could be used to provide the off street parking space.	No change
2.12	Bob Bennett	Town Planning & Regeneration	Gives support for the requirements for stacking and sound proofing.	Support noted	No change
2.12	Howard J Green (FRICS)	Individual	Sound issues as between flats is not now a planning issue. Guidance note 8: conversion of Buildings into flats issued by your Building Control Service indicates the high standards of sound insulation required in conversions. Para. 10 of Annex 7 of PPG24: Planning and Noise states that..."the government considers that the building regulations are the most appropriate means of control for sound insulation in such conversions and local planning authorities should not therefore use planning conditions to control sound insulation in such cases".	From the Planning perspective, the impact of noise can be a material consideration in the determination of planning applications. Local authorities are guided on how to use their planning powers to minimise the impact of noise by Planning Policy Guidance 24(PPG24). The Building Regulations 1991 impose requirements for sound insulation between dwellings and provide guidance on how the required standards of sound insulation can be achieved. Although the planning guidance ( PPG24) suggests there is no need to utilise conditions to control issues of noise, it does encourage the use of other means to mitigate the impact of noise through the use of measures such as layout, as highlighted in para.2.12 of the IPP. Additionally, there may be exceptional circumstances where it may be necessary to use planning conditions requiring the sound proofing of party walls etc. to make a development acceptable. That said, it is accepted that this is not clearly articulated in para.2.12 of the IPP. This will be clarified.	Replace the last sentence in para. 2.12 with the following sentence -"Although requirements for sound insulation between dwellings is covered primarily by Building Regulations, there may be exceptional cases where the Council may ask the applicant to provide sound proofed party walls".
2.13	Bob Bennett	Town Planning & Regeneration	Not all occupiers of flat conversions require direct access to their own amenity open space. The visual amenity resulting from the open space is more important.	In order to ensure that the best quality of new developments are brought forward in the borough, it is considered that the provision of direct access to a garden is required.	Para.2.13, Remove - "we would expect developers to provide...." and reword to state that " developers should seek wherever possible to provide ..." end of sentence add ..." subject to other amenity considerations."
2.13	Howard J Green (FRICS)	Individual	"...for conversions we expect developers to provide access to garden/outdoor space...". Another example of how unreasonable the IPP is. This would rule out conversions in virtually all terraced properties in that rear access steps to a garden will have an unacceptable impact on the privacy of adjoining occupiers.	In order to ensure that the best quality of new developments are brought forward in the borough, it is considered that the provision of direct access to a garden is required.	Para.2.13, Remove - "we would expect developers to provide...." and reword to state that " developers should seek wherever possible to provide ..." end of sentence add ..." subject to other amenity considerations i.e. overlooking from external staircases.."

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2.14	Bob Bennett	Town Planning & Regeneration	General support	Support noted	No change
2.14	Howard J Green (FRICS)	Individual	Without ripping out the inside of an entire property, access and door widths could not be improved. Little can be done to improve accessibility.	The Council accepts that little can be done to existing buildings to make them more accessible. The wording of paragraph 2.14 reflects this but highlights that plans should go as far as possible to meet the standards of accessibility where possible.	No change
2.15	Bob Bennett	Town Planning & Regeneration	Agree that care should be taken to minimise clutter in front flat conversions, however proposals for off street parking will cause more loss of visual amenity than the other items in this paragraph.	Point noted. The visual impact resulting from off street parking, weighed against the gains resulting from such provisions (i.e.de-congestion of roads, increased road safety, safe provisions for car storage etc.), are considered to outweigh any loss of visual amenity which may result from off street parking. This requirement when coupled with the Council's other existing policies aimed at safeguarding the visual character and appearance of the fronts of such properties, should ensure the provision of visually appealing, clutter free conversions.	No change
2.15	Mr Barry Coidan	Individual	Concerned that these guidelines are unlikely to be followed. The evidence from existing conversions is not encouraging. They are not mandatory - how is best practice to be encouraged?	All planning applications for house conversions will be considered on the basis of this guidance. The Council will use its planning powers to ensure that applicants consider the changes to external areas and reflect these in the plans. Planning permission will only be granted where the proposed plans meet policy requirements. A section on enforcement will be added to chapter 3 of the IPP, outlining the Council's mechanisms aimed at ensuring compliance with planning permissions, after planning permission has been granted.	Add new section to chapter 3 Monitoring and Review -Heading: "Enforcement" Text:" The council operates an enforcement system which actively encourages the community to highlight any breaches to council planning policies. The council will continue to rely on this system and will endeavour to strengthen community awareness, participation and encourage community ownership of the policies within this document to reduce the need for enforcement and to encourage compliance."
2.16-2.20	Bob Bennett	Town Planning & Regeneration	No comments	Noted	No change
2.20	Mr Terry Hines	Individual	A line of wheelie bins does not look attractive. The height of existing bins means that to provide an enclosure around them will make them even more bulky. With the increase in recycling and the reduced amount of household waste Is it possible to consider having bins that are say 1m high? I have seen houses with up to three recycling bins outside. Could these be changed to a 1m high bin too?	The proposed sizes of the wheelie bins would be based on the council's waste management services' provisions. As wheelie bins are a council provided facility this document does not propose to put forward standards for such facilities. We will work closely with the waste management service to ensure the best provisions are made, in line with their requirements. This would ensure the best provisions are also made for practical recycling facilities.	No change

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3.1	Mr Barry Coidan	Individual	What data does the Planning Committee receive. I am concerned that in the past the Planning Committee has continued to approve conversions when the accumulating evidence was pointing to a growing imbalance in the Borough's housing stock.	Decisions made by the planning committee are guided by the expert recommendations made by planning officers. These recommendations are based on the principles, policies and guidance provided in the borough's Unitary Development Plan and on evidence from consultation with residents and a visit to the site. This Interim Policy which has been developed based on further evidence, will now strengthen the existing guidance and provide a clearer steer for the planning committee to base their decisions on.	No change
4.2	Mr Terry Hines	Individual	I hope that you continue to provide a duty planner during the whole of normal office hours as opposed to Epping Forest where the person is only obtainable part time!	The Council's Duty Planning Officer is available from 10am - 4pm, Monday to Friday. There are no plans to alter this provision.	No change
General	Claire McAlister	British Waterways	No comment to make on document	Noted	No change
General	Barbara Robertson (Chair - Planning and Environment Committee)	Forest Residents Association	Support the council's intervention, in particular para. 2.12 regarding sound proofing of party walls.	Noted	No Change
General	Rachael A. Bust	The Coal Authority	no specific comments	No response needed	No change
general	Bob Bennett	Town Planning & Regeneration	The revised guidance would if adopted, rewrite policy HSG12 of the UDP	Based on recent evidence, it has been necessary to review and update Policy HSG12. The Council is not proposing to save that policy beyond March 2009, when, if not saved by the Government Office for London, the policy will expire. This Interim Planning Policy Document will in effect provide the main guidance on the Council's approach to house conversions until further guidance is provided as we develop the replacement documents (LDF) which will steer the borough's development in the future.	No change
General	Bob Bennett	Town Planning & Regeneration	The policy seems to have been based more on public concern than any rational planning policy justification or evidence.	The policy is backed by a strong evidence base which includes a Housing Needs and Market Survey (2007) and internal records on the number of conversions approved over the years. The Housing Needs Assessment Study will soon be made publicly available.	No Change

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General	Bob Bennett	Town Planning & Regeneration	Change of character in an area could be dealt with by making reference to over concentration in the guidance rather than the policy as drafted which results in a ban of all flat conversions and loss of low cost housing opportunity for occupiers who either do not require or cannot afford larger family houses.	The Policy document does not propose a ban on all flat conversions but seeks to address other concerns around over concentration and provision of a balanced housing supply. Council policy on affordable housing continues to deliver new low cost housing.	No change
General	Catherine Henderson	Individual	Judging by the IPP, the council seems to have concluded that by discouraging conversions this will stop a decline in the number of families living in the area - is it not more complicated than that?	The Council appreciates the complicated nature of retaining families in the borough. Such a multi-faceted issue requires a multi-faceted approach . The Planning system does not and would not propose to provide the only solution to addressing such an issue but it is tasked with addressing it where and how it can. This IPP aims to provide one of those facets, by proposing to safeguard the built environment which would meet the needs of such families.	No change
General	Catherine Henderson	Individual	Houses in Multiple Occupation are more of a problem - these are frequently rather neglected looking while conversions seem to be a lot better maintained	The Council's planning policies addressing issues around Houses in Multiple occupation are provided in another planning document - the adopted Unitary Development Plan 2006. This issue will be further addressed at a later stage in the relevant emerging LDF policy documents.	No change
General	Catherine Henderson	Individual	Banning or discouraging conversions may not meet the councils' objectives. The focus should be on making the area seem safer , removing graffiti to entice families to live in the area or to buy houses that would otherwise be converted. Establishing through market research, who are the people who do want to buy or rent in this area and whether they are families or single people.	The Council's Sustainable Communities Strategy outlines the Council's priorities. This SPD aims to tackle the key Council priority - "To Manage Population Growth and Change". Addressing such priorities requires a multifaceted approach. Issues around community safety, urban design and the like, are not the focus of this document. Such issues will however be addressed from a planning perspective, in other planning policy documents, due to be produced as part of the emerging Local Development Framework. With regard to the market research aspect of this query, this IPP has been guided by in-depth research on the borough's housing needs (Housing Needs and Market Survey (2007)). The research will soon be available for public viewing on the Council's website.	No change

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General	Geoff McDowall	Individual	Broadly supportive of the aims of the document. Hopefully there is some way of ensuring that it will be enforced if implemented.	Noted - A section on enforcement will be added to the document	Add new section to chapter 3 Monitoring and Review -Heading: "Enforcement" Text:" The council operates an enforcement system which actively encourages the community to highlight any breaches to council planning policies. The council will continue to rely on this system and will endeavour to strengthen community awareness, participation and encourage community ownership of the policies within this document to reduce the need for enforcement and to encourage compliance."
General	Howard J Green (FRICS)	Individual	Is this interim policy going to be subject of a public inquiry? Have you consulted the Mayor of London and Government office For London?	Interim Planning Policy Documents are not subject to public inquiry. However, the policy form part of the emerging LDF, which will be subject to an Examination in Public. The Government Office For London which represents the views of the Mayor of London has been consulted.	No change
General	Miss Rachael A. Bust	Individual	no comment	Noted	No change
General	Pedro Nunez	Individual	A blanket policy or an arbitrary 200 yard rule is short sighted. Surely cases should be looked at on an individual basis. Where properties become expensive to run, a quality conversion would enable occupiers to still live in the area and rent the other flat. This blanket approach will drive away young professionals as they are more likely to want to rent or buy affordable property here. Tightened control of developments could be the way forward.	Recent evidence has shown that the approach used to date in dealing with dwelling conversions has now resulted in an unsustainable and highly unbalanced level of conversions in some parts of the borough, particularly in the proposed restricted zones. Based on this evidence, the proposals in this IPP, have been found to be a necessary means of ensuring and protecting a more balanced built environment, to ensure the needs of the community can be met. Other forms of housing will continue to be provided, with a continued emphasis on the provision of "affordable" housing to continue to meet the needs of young professionals and the full range of potential occupiers wishing to locate in the borough. The emerging LDF Core Strategy will aim to provide policies on housing in particular, targeting the issue of affordable housing, ensuring the maximum provision through other means.	No change
General	Rose Freeman	Individual	No comments	Noted	No change
General	Sandra MacPhee	Individual	Agree with the document	Noted	No change

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General	Bob Bennett	Town Planning & Regeneration	the guidance would effectively end the contribution made by dwelling conversions to the total dwelling stock in the borough as required by policy HSG5 of the UDP. This would not accord with paragraph 3.66 of the UDP which recognises the importance of conversions in meeting the councils housing targets, nor with PPS3 para..31 which encourages conversion of existing housing or policy 3A.5 of the London Plan	This guidance does not propose a complete halt in conversions across the borough. Rather, it is considered better to meet our housing target by developing high quality purpose built units as opposed to the conversion of existing, good quality family units. Further, there is a requirement in the borough to maintain a reasonable supply of family housing as identified in the housing needs and market survey (2007). The council is in the process of saving some of its UDP policies while others will be deleted in order for the plan to be more in accordance with the current local, regional and national policy.	No change
Section 3	Bob Bennett	Town Planning & Regeneration	No indication of the steps to be taken if the outcome of the revised policy results in the cessation of all flat conversions.	Flat conversions only provide one form of housing provision. If no more flat conversions occur, there are other means of achieving the housing need which these conversions would have met. Through the monitoring of the LDF policies (AMR), we will continue to assess the numbers of units being completed through conversions and new build. If considered necessary, amendments to policy will need to be considered at a later stage.	No change