Research into the quality standard of homes delivered through change of use permitted development rights

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List of acronyms and abbreviations

CIL – Community Infrastructure Levy

DPD – Development Plan Documents

EPC – Energy Performance Certificate

FPA – Full Planning Application

GIS – Geographic Information System

GLA – Greater London Authority

GPDO – General Permitted Development Order

HMO – House in Multiple Occupation

IMD – Index of Multiple Deprivation

LPA – Local Planning Authority

MHCLG – Ministry of Housing, Communities and Local Government

NaPTAN – National Public Transport Access Node

NDSS – Nationally Described Space Standard

PA – Prior Approval(s)

PD – Permitted Development

PDR – Permitted Development Rights

PP – Planning Permission

PRS – Private Rented Sector

S106 – Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as s106 agreements

SF – Square foot

SME – Small and Medium Enterprise

SPD – Supplementary Planning Document

SPG – Supplementary Planning Guidance

UDP – Unitary Development Plan

1. Executive summary

Permitted development rights (PDR) have existed ever since the implementation of the comprehensive, statutory planning system in 1948. The extent of these rights has changed over time, and there have been a number of significant extensions since 2013, allowing the creation of new dwellings through PDR for the change of use of buildings formerly in office, agricultural, storage, light industrial, retail and various associated sui generis uses into residential 'dwellinghouse' use.

Those interested in implementing such a change of use scheme through PDR must apply to the relevant local planning authority (LPA) for 'prior approval' (PA), a time-limited process whereby the authority may consider a restricted range of planning matters before granting or refusing the proposal. The LPA cannot consider the principle of the conversion, nor can they consider any issues relating to the proposed design (such as external appearance, the mix of units, the layout of units or their space standards). It is also generally held that a Section 106 planning obligation cannot be agreed.

The PDR do not apply to listed buildings, nor do they apply in areas where the rights have been removed through an Article 4 direction. This means some change of use schemes do still come through a full planning permission instead (where the local authority can consider the principle of the change of use, its design, and potentially obtain planning gain through a Section 106 agreement). At the same time, some rights, such as from office-to-residential, do not allow associated works, and others permit only limited works through the prior approval. Some PDR projects therefore involve an application for a full planning permission for further associated works alongside the PA.

There has been increasing concern about the impacts of these extended permitted development rights, with a particular focus on office-to-residential conversions. Concerns raised include the potential loss of employment space, the loss of planning gain (especially affordable housing contributions), and the design and quality of residential units created through the rights. There has been considerable media attention around the housing quality issue.

This research, commissioned by MHCLG, considers the quality standard of homes delivered through change of use PDR. In order to do this, a case study approach is taken, looking at proposed and implemented schemes for change of use from office-to-residential, retail / sui generis-to-residential and storage / light industrial-to-residential consented through the permitted development (PD) route and, for comparison, any schemes consented through full planning permission in 11 LPAs across England (Bristol, Crawley, Derby, Enfield, Huntingdonshire, Manchester, Richmond, Sandwell, Sunderland, Wakefield and Waverley) between April 2015 and March 2018. These authorities represent a diverse range of authorities in terms of their socio-economic characteristics, geographical locations, urban/rural mix and built environment characteristics. The research involved site visits to 639 buildings, and a detailed desk based analysis of 240 of those schemes, comprising 138 prior approval schemes (92 office-to-residential, 33 retail/sui generis-to-residential and 13 storage/light industrial-to-residential) and 102 planning permission schemes (44 office-to-residential, 47 retail/sui generis-to-residential and 11 storage/light industrial-to-residential).

From this analysis, we found a slightly more nuanced picture – in terms of the comparison between the quality of residential units created through permitted development with those created through full planning permission – than has been suggested by some previous research and media coverage. Looking across all categories of change of use and all 11 local authority areas considered, rates of making exterior alterations, such as new windows, doors, balconies and cladding, are broadly similar between planning permission and PD schemes. In terms of noticeable additional amenities, such as provision of parking and open space and facilities for refuse and post,

there are no obvious differences between planning permission and PD consented schemes overall. There was also little difference between PD and planning permission units in terms of energy performance or council tax banding (and hence potential property value).

In terms of access to services, transport and green space, and in terms of general level of deprivation within a neighbourhood, there is overall little difference between PD and planning permission schemes. There was, however, a notable tendency that PD schemes were more likely to be located in primarily commercial areas (like business parks) and primarily industrial areas than planning permission schemes (7.9% of PD schemes compared to 1.0% of planning permission schemes; about eight times more). Our site visits found that some of these locations offered extremely poor residential amenity.

Looking at the internal design of conversions did, however, reveal much more significant difference between schemes created through planning permission and those created through permitted development. Overall, only 22.1% of dwelling units created through PD would meet the nationally described space standards (NDSS), compared to 73.4% of units created through full planning permission. In many cases, the planning permission units were only slightly below the suggested standard, whereas the PD units were significantly below (for example, studio flats of just 16m^2 each were found in a number of different PD schemes). 68.9% of the units created through PD were studios or one bedroom compared to 44.1% of the planning permission units.

In terms of the arrangement of windows, 72.0% of the dwelling units created under PD only had single aspect windows, compared to 29.5% created through planning permission, whereas 67.1% of the planning permission units benefitted from dual or triple aspect windows compared to only 27.3% of PD units. This does not consider more detailed aspects such as the size of the windows, their arrangement in relation to the layout of the unit, or their outlook, but is suggestive of PD units having worse natural daylight and sunlight than planning permission units. We found ten units (0.4% of the PD units considered in our research) which appeared to have no windows at all (no such units were found in schemes consented through planning permission). In some cases, PD schemes had layouts which would reduce access to natural light, for example, contrived layouts to enable the unit to have a window which was then far removed from the main usable floorspace of the unit.

Regarding amenity space, just 3.5% of the PD units we analysed benefitted from access to private amenity space, compared to 23.1% of the planning permission units. It is the combination of very small internal space standards, a poor mix of unit types, lack of access to private amenity space / outdoor space, and inadequate natural light which can provide such a poor residential experience in some permitted development units.

Looking within the categories of change of use, space standards, window arrangements and access to amenity space are all worse in office-to-residential schemes than the other categories of PD. In terms of location, storage / light industrial-to-residential units tended to have the worst access to services (reflecting the fact that many storage units are actually located on farms in isolated rural areas) and worst locations for residential amenity (reflecting the industrial estate locations of some light industrial schemes).

Given these considerations, we would conclude that permitted development conversions do seem to create worse quality residential environments than planning permission conversions in relation to a number of factors widely linked to the health, wellbeing and quality of life of future occupiers. These aspects are primarily related to the internal configuration and immediate neighbouring uses of schemes, as opposed to the exterior appearance, access to services or broader neighbourhood location. In office-to-residential conversions, the larger scale of many conversions can amplify residential quality issues.

It is noticeable, however, that although the percentage of units meeting space standards is higher under planning permission than permitted development in all 11 of our case studies, there is still significant variation between the percentages meeting the standard between each LPA. The

drivers of lower residential quality are multiple, with complex interactions likely to explain the situation in any one location. We considered a number of socio-economic factors (including average house prices, office rental prices and vacancy rates, unemployment and index of multiple deprivation levels) against space standards and conclude that the local socio-economic situation does appear to have an influence on quality. The type of buildings available for change of use (and so likelihood of large office conversions) also appears to be significant.

In addition to our analysis of conversion schemes, we also interviewed planners from the 11 case study authorities, and 12 developers (and their agents) working in different parts of England. The prior approval process itself is considered to be an increasingly complex and resource intensive area for LPAs. There appears to be inconsistency, and even confusion, over when schemes are treated as 'prior approval required and granted' and when they are treated as 'prior approval not required'. Most PD change of use schemes avoid making any planning contributions at all, being considered not liable for Section 106 planning obligations and frequently able to avoid Community Infrastructure Levy (CIL) payment through creating no additional floorspace and having been at least partially occupied in use prior to the change of use. This concerns many LPAs, given that additional residential units do create additional pressure on local infrastructure (particularly social infrastructure but also potentially green infrastructure, given the lack of amenity space provision in so many schemes).

Developers value the prior approval system for its certainty over the principle of change of use and for its speed compared to a full planning application. Requiring higher standards (such as compliance with NDSS) could reduce the number of housing units delivered, particularly in those locations with the most marginal development viability. Higher spec units may, however, be a better long-term investment, given potential future resale value and obsolescence of the residential conversions. In interview, some developers themselves appeared to be open to the idea of some standards being applied through the prior approval process, so long as these did not unduly delay the consent.

Overall, this research has revealed a more fine-grained understanding of the quality of residential units delivered through different categories of PD and a greater understanding of the wider influence of the market and developer preferences on quality. In some factors considered, such as external appearance, energy performance, access to services or neighbourhood deprivation, on average there was little difference between change of use schemes consented through permitted development and those consented through a full planning permission. However, there was a noticeable difference between schemes consented through the two routes in relation to the following key issues:

- Delivery against space standards for dwelling units
- The mix of units in a scheme (studios, one-bedroom flats etc.)
- Adequacy of natural light into dwelling units
- Access to amenity space (most significant for larger scale conversions)
- Immediate location (for example, if surrounded by neighbouring industrial uses)

Examples of these residential quality issues were found in all categories of PD considered. In terms of broader issues arising from this research, the following appear to stand-out:

- Inconsistent handling of prior approvals by local authorities
- Poor levels of supporting information associated with many prior notifications (particularly in relation to floorplans)
- The liability for CIL of change of use schemes (where CIL is adopted locally)

2. Introduction

The research investigates the quality of homes delivered through permitted development rights (PDR) which allow the change of use of a range of business premises into residential use. Ministry of Housing, Communities and Local Government (MHCLG) data shows that 46,292 net additional dwellings were created under such PD from April 2015 – March 2018 (see Appendix 14). The research has been conducted at a time when there is widely perceived to be a severe shortfall of housing across England, and when a strong policy theme for government has been addressing the need to increase the delivery of homes.

Policy context

Planning reforms implemented over recent years have primarily sought to support the delivery of housing. Alongside extensions to permitted development (PD), other reforms and measures have been implemented, such as revisions to the National Planning Policy Framework, the Help to Buy Scheme, Housing Infrastructure Fund and lifting of the local authority Housing Revenue Account debit cap.

In addition to seeking to increase supply, however, there have been concerns relating to the management, quality and design of housing provision. The Grenfell Tower fire drew attention to the need to ensure a reasonable management approach for social housing, considering tenants' rights in particular. It also triggered the Hackitt Review, which has considered Building Regulations in particular, alongside an ongoing programme of building safety works.[1] A recent consultation has looked at updating the Housing Health and Safety Rating System.[2]

The Building Better, Building Beautiful Commission is currently ongoing and due to report by the end of 2019. It aims to consider measures to promote better design of homes and places and any planning reforms required to promote this. The Commission's interim report was recently published and made several references to PD.[3] Speaking at the Chartered Institute of Housing conference on 26 June 2019, the then Prime Minister also announced an upcoming consultation on environmental performance in new build homes, with a 'Future Homes Standard' to give all new homes better energy efficiency by 2025, and also discussed future housing standards.[4]

Finally, in terms of general context, there is also a regeneration and economic development context to consider, with a desire to put vacant office, industrial and retail units into positive use, stimulating the economy (of town and city centres) by bringing more residents in and increasing spend. For example, the future of the high street continues to be a policy priority, with an Expert Panel having been convened last year and a Future High Streets Fund established. The High Street Report notes the changing nature of retail behaviour and increase in vacant shops seen across the country.[5]

This research is thus being conducted in the context of policy concerns to boost housing supply, but also ensure good quality new housing, provide sufficient affordable housing, promote good

[1] 'Independent Review of Building Regulations and Fire Safety: final report' at https://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report

[2] 'Housing Health and Safety Rating System: outcomes of the scoping review' at https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-outcomes-of-the-scoping-review

[3] 'Creating space for beauty: interim report of the Building Better, Building Beautiful Commission' at https://www.gov.uk/government/publications/creating-space-for-beauty-interim-report-of-the-building-better-building-beautiful-commission

[4] 'PM's speech on housing: 26 June 2019' at https://www.gov.uk/government/speeches/pms-speech-on-housing-26-june-2019

[5] 'The High Street Report' at https://www.gov.uk/government/publications/the-high-street-report

principles of design and place-making, ensure building safety, regenerate town centres, and respond to the changing nature of the high street.

Planning context

Permitted development has always existed since the statutory planning system was first introduced in England in 1948, given the wide-ranging definition of 'development' in the 1947 Act. There have been changes to the extent of PD at several points in the post-war history of planning, with recent years seeing some acceleration in the rate of change. Notable changes to PD policy have been seen in 2005, 2010, 2013 and 2015. Permitted development rights are usually granted through the General Permitted Development Order (GPDO), with the most recent version being the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).[6]

Arguably the most significant extension of PD was in 2013, with the initial temporary (subsequently made permanent) right to convert offices (use class B1a) into residential use (as use class C3 dwellings) through PD. The policy intention stated by the then Secretary of State was primarily to boost the supply of housing, but also to help regeneration through putting vacant or under-utilised office space to productive use.

There has been some controversy surrounding this category of PD. This has primarily related to the loss of employment space, the inability of local authorities to levy Section 106 planning obligations on such schemes (particularly relating to affordable housing contributions, a key concern of the Local Government Association) and to the quality of homes delivered through this route, with local authorities unable to consider design through the prior approval process (much of the focus has been on the space standards of homes delivered through PD, as commented upon widely in the professional and general media).

Alongside office-to-residential PD, however, there have been a number of different categories of PD which have created further rights to undertake certain changes of use to residential. These include agricultural-to-residential (increased in 2018 to allow up to 5 homes to be created per site), light industrial to residential, storage and distribution centres to residential, retail and certain sui generis uses to residential. In general, these other categories have been less publicly controversial that office-to-residential PD and have seen much smaller numbers of net additional dwellings provided through them, although, for example, there has been some media attention relating to examples of light industrial to residential conversion.[7]

The GPDO specifies that changes of use from business premises to residential use are subject to a process of 'prior approval'. This was introduced by the Growth and Infrastructure Act 2013 and Housing and Planning Act 2016 causing Section 60 of the Town and Country Planning Act 1990 to be amended. Under prior approval, a local planning authority (LPA) has 56 days in which to consider specific planning matters, as set out in the individual rights. In summary, these involve consideration of issues in relation to flooding, land contamination, highways and noise. The LPA cannot consider the principle of the change of use (since this is *permitted* development), nor can they consider the breadth of other planning matters that would be considered through a Full Planning Application (FPA), for example issues of design or compliance with policies from the local plan (which might include the Nationally Described Space Standard (NDSS) published in 2015).[8]

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[6] 'Extending permitted development rights in England: the implications for public authorities and communities' at https://www.rics.org/globalassets/rics-website/media/knowledge/research/insights/extended-permitted-development-rights-in-england-the-implications-for-public-authorities-and-communities-rics.pdf

[7] 'Anger at Watford planning law allowing 'oppressive' small flats' at https://www.bbc.co.uk/news/uk-england-beds-bucks-herts-49019132

[8] 'Technical housing standards – nationally described space standards' at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

In general, the PDR for change of use from business to residential buildings does not include any building works that materially affect the exterior of the building, so works like new balconies or cladding as part of an office-to-residential conversion would require a planning permission alongside the prior approval. When the office-to-residential PDR was introduced in 2013, there were also 17 areas that were granted an exemption; these were confirmed through the 2015 GPDO and extended in 2016 to expire 30 May 2019[9].

A local authority can also remove PDR by consulting on and introducing an 'Article 4 direction', which has the effect of preventing a certain type of development being carried out in a specified area unless planning permission is obtained. Article 4 directions must take into account Government's Guidance, which states that there must be clear justification for removing national PDR.[10] In August 2019, there were 57 LPAs with such directions across England (see Appendix 12).

In March 2019, a Written Ministerial Statement announced further PD rights to create residential units (for example from hot food takeaways to residential), the cessation of the temporary right to change storage to residential, the intention to allow a 'building upwards' PD to create additional residential units on top of existing commercial buildings and the potential design of a PD right to allow commercial buildings to be demolished and replaced with residential buildings.[11] The same statement also announced a review of the quality of residential units delivered through PD.

Previous research

A number of previous studies have considered PDR for change of use to residential, almost exclusively focussed on office-to-residential PDR. Many studies are desk-based analyses of the rates of use of the rights, considered the gap between prior approvals and implementations and discussed impacts such as the potential loss of employment space or affordable housing contributions, for example:

- BCO, 2015 and 2017[12]
- London Councils, 2015[13]
- GLA / Ramidus, 2017[14]
- LGA, 2018[15]

Existing research has also discussed concerns over the housing quality of units delivered through office-to-residential PDR, particularly in relation to space standards and amenity issues, for example:

- Muldoon-Smith and Greenhalgh, 2016[16]

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[9] 'Areas exempt from office to residential change of use permitted development right 2013' at https://www.gov.uk/government/publications/areas-exempt-from-office-to-residential-change-of-use-permitted-development-right-2013

[10] 'What is an Article 4 direction' at https://www.gov.uk/guidance/when-is-permission-required#article4

[11] 'Planning update: Written statement - HCWS1408' at https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2019-03-13/HCWS1408/

[12] 'Office-to-residential conversion' at http://www.bco.org.uk/Research/Publications/Office-to-residential_conversion.aspx and 'Permitted Development Rights: One year on from permanence' at http://www.bco.org.uk/Research/Publications/Permitted_Development_Rights.aspx

[13] 'The impact of permitted development rights for offices' at https://www.londoncouncils.gov.uk/our-key-themes/housing-and-planning/permitted-development-rights/impact-permitted-development-rights

[14] 'London Office Policy Review 2017' at https://www.london.gov.uk/sites/default/files/london_office_policy_review_2017_final_17_06_07.pdf

[15] 'LGA permitted development order survey 2018' at https://www.local.gov.uk/sites/default/files/documents/Permitted%20development%20survey%202018%20-%20report%20FINAL_1.pdf

[16] 'Greasing the wheels, or a spanner in the works? Permitting the adaptive re-use of redundant office buildings into residential use in England' at https://www.tandfonline.com/doi/full/10.1080/14649357.2016.1156144

- Holman et al, 2017[17]
- Remøy and Street, 2018[18]
- Park, 2019[19]
- Copley, 2019[20]

The potential financial implications of PD, and an analysis of costs and benefits, was discussed in a report authored by Peter Bibby and colleagues from the University of Sheffield published by RICS in 2018.[21] This looked across all categories of PD. It was published in parallel to a report by the UCL authors of this report which examined the implications of extending PDR to include office-to-residential change of use since 2013.[22] Looking in detail at five English LPAs as case studies (Camden, Croydon, Leeds, Leicester and Reading). This considered potential implications in relation to affordable housing supply, the costs of providing infrastructure, but concluded that issues relating to the quality of housing being delivered through PDR were of greatest concern.

Although this report builds on the backdrop of such existing research, including that by its own authors, it has been conducted as a new piece of work and entirely separately to existing work. This new report looks more broadly, at a larger number of local planning authorities, of different characteristics, and across a wider range of types of PDR (including, office-to-residential change of use but also other categories, as specified below).

Research objectives

The aim of this research is to extend existing work to consider the quality standard of homes delivered through change of use permitted development rights. In order to meet his overall aim, the objectives are to:

1) Investigate and analyse the quality of homes from permitted development rights in terms of space, amenity, location and design and how this differs from homes delivered through a planning application;
2) Identify the housing market drivers for the delivery of different standards of conversions to residential use and how that applies in the local area; and
3) Consider the potential impact on the number and quality of homes delivered, if other requirements, such as section 106 contributions or space standards were introduced by the local authority that would normally be considered as part of a planning application

These objectives are addressed by taking a case study approach, which considers the impacts of PDR in 11 different English LPAs. The research considers the following change of use PD categories:

- 'Office-to-residential' (Use Class B1(a) offices to C3 dwellinghouses)
- 'Retail sui generis-to-residential' (Use Classes A1 shops, A2 Financial and professional services and sui generis uses betting shops, pay day loan shops, launderettes, casinos and amusement arcades to C3 dwellinghouses)

[17] 'Planning, value(s) and the market: An analytic for "what comes next?"' at https://journals.sagepub.com/doi/full/10.1177/0308518X17749730
[18] '"The dynamics of "post-crisis" spatial planning: A comparative study of office conversion policies in England and The Netherlands' at https://www.sciencedirect.com/science/article/pii/S0264837716305233
[19] 'Why the government should end permitted development rights for office to residential conversions' at https://www.levittbernstein.co.uk/site/assets/files/3256/end-pdr-for-office-to-resi.pdf
[20] 'Slums of the future' at https://www.london.gov.uk/sites/default/files/slums_of_the_future_-_permitted_development_conversions_in_london_by_tom_copley_am.pdf
[21] 'The exercise of permitted development rights in England since 2010' at https://www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/the-exercise-of-permitted-development-rights-in-england-rics.pdf
[22] 'Impact of extending development rights to office-to-residential change' at https://www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/assessing-the-impacts-of-extending-permitted-development-rights-to-office-to-residential-change-of-use-in-england-rics.pdf

- ‘Storage and light industrial-to-residential’ (Use Classes B1(c) light industrial and B8 storage and distribution to C3 dwellinghouses)

There is also a fairly widely utilised PDR allowing the change of use from agricultural buildings to residential, however that is not within the scope of this research as set by MHCLG. In a small number of tables in this report, secondary data about this change of use is included as part of our context setting but we have not collected any new data in relation to agricultural-to-residential conversion and do not make any assessment of the quality of residential units delivered through it in this report.

3. Approach taken

In order to address the aim of this research, a case study approach has been taken, looking at commercial to residential change of use in 11 case study LPAs across England. These authorities were selected on the basis of combining several criteria, with the aim of providing a good sample of different types of change of use and different types of housing market across all authorities:

1) Geographical distribution: there is one case study LPA per standard region in England, and two each for London and the South East regions. This helps ensure a representation of different housing markets and an understanding of where the impacts of PDR may have been most significant;
2) Type of authority: there is at least one authority in each of the six classifications of urban/rural as per the Office for National Statistics criteria.[23] This ensures a good representation of a mix of urban and rural authorities (with at least one New Town included) and so of different types of change of use and housing market, particularly given previous research has tended to be more urban focussed;
3) Rates of change: authorities with higher rates of use of the PDR offer more opportunity to assess its impacts, and this is particularly important given the lower rates of use for retail / sui generis and storage / light industrial to residential compared to office-to-residential, as reported in MHCLG live tables (see Appendix 2 and 3);
4) Article 4 directions: inclusion of some authorities with, as well as some without, article 4 directions helps give a range of authority regulatory positions;
5) Authorities previously studied: Camden, Croydon, Leeds, Leicester and Reading are excluded because these authorities were used for the detailed case studies used by the UCL team for the research on office-to-residential PD published by RICS in 2018. Although this research for MHCLG is wider in scope than that project, and being conducted as a completely separate project, a similar analysis has already been completed for those authorities. It was therefore decided to broaden the research by looking at a new selection of local authorities.

Combining these factors produced a shortlist of local authorities who were then approached to ask if they would be willing to cooperate with the research. The result is that this research examines the following case study LPAs:

- Bristol (South West, 'Large urban' authority, no Article 4 directions)
- Crawley (South East, 'Other urban' authority, Article 4 directions)
- Derby (East Midlands, 'Other urban' authority, no Article 4 directions)
- Enfield (London, 'Major urban' authority, no Article 4 directions)
- Huntingdonshire (East of England, 'Rural 80' authority, no Article 4 directions)
- Manchester (North West, 'Major urban' authority, 2013-2019 area of exemption and subsequent Article 4 directions)
- Richmond (London, 'Major urban' authority, Article 4 directions)
- Sandwell (West Midlands, 'Major urban' authority, no Article 4 directions)
- Sunderland (North East, 'Major urban' authority, no Article 4 directions)
- Wakefield (Yorkshire and the Humber, 'Significant rural' authority, no Article 4 directions)
- Waverley (South East, 'Rural 50' authority, Article 4 directions)

A profile of each case study LPA has been produced (see the appendices of this report). This involves a summary of any relevant planning policies from adopted local plans and supplementary planning documents, produced on the basis of published documentation, as well as a sense of

[23] 'Rural/urban local authority (LA) classification (England)' at https://www.ons.gov.uk/methodology/geography/geographicalproducts/ruralurbanclassifications/2001ruralurbanclassification/ruralurbanlocalauthoritylaclassificationengland

their housing and broader real estate markets. The real estate market overview draws on published statistics from sources such as the Office for National Statistics.

Each LPA was asked to send the research team a list from their planning databases of any prior notifications (applications for prior approval) received for the categories of PDR being considered in this research between 1 April 2015 – 31 March 2018. They were also asked to send a list of any planning applications received in relation to the same categories / types of change of use for the same period (full planning applications might be submitted if the building was in an area of exemption from the PDR such as those covered by an Article 4 Direction, if the building itself was exempt from the PDR – primarily listed buildings, or if the developer wants to do works beyond what is permitted through PDR and would just like a single consent rather than having both a prior approval for the change of use and a planning permission for the other associated works).

In practice, the prior approvals lists were generally produced fairly easily by the local authorities but distinguishing relevant change of use planning applications was more difficult. In some cases, the LPA did this selection for us, but in a number of cases, a full list of every single change of use planning application received in that authority over the relevant period was sent. In those cases, the relevant cases were selected on the basis of a manual selection based on the proposal description text. This involved looking over several hundred potentially relevant schemes per authority.

These lists were then used to provide an overview for each case study authority of the number of applications made, and where stated in the description, the number of units proposed. By looking at site addresses, situations where multiple applications have been submitted for the same property were identified and a list of the number of buildings permitted for conversion to residential use in each area generated. This latter stage is particularly important with prior approvals, as it is not uncommon to get several for the same address (sometimes these are overlapping, changing the proposal, and sometimes they are complementary, e.g. for different floors or parts of the building).

Where there was a prior approval and a full planning permission for the change of use of the same building, this was classified as a ‘prior approval scheme’ or a ‘planning permission scheme’ for the basis of the site visits based on which approval was the most recent (this is distinct from schemes where a prior approval has been used for the consent of the change of use and a planning permission for other associated works, which would be counted as a prior approval scheme).

The number of units per scheme was also collated, using the text of proposal descriptions. This data set is incomplete, as such proposal descriptions do not always mention this and there was not sufficient time to work this out for every scheme (which in many PD cases can only be determined by looking at floorplans, if available). In our initial data, Richmond only sent us approved schemes, so the refusal data is incomplete. It is also worth highlighting that there is inconsistent handling between LPAs of PD schemes, between ‘prior approval required and granted’ and ‘prior approval not required’ (which means, in effect, the LPA is just allowing the development to happen as PD). Therefore these were both counted as ‘allowed’ in our analysis.

From the list of schemes for each local authority, a list of site addresses was produced and this list was then geocoded by utilising ‘Google My Maps’ (see e.g. Figure 13). Researchers were sent to try to visit every change of use site (both consented via the PD and the FPA routes) in each case study authority, except Bristol. In Bristol, the number of change of use sites was far greater than any other single authority (179, with Richmond the next highest on 108) and beyond the time available for the site visits. In this case, every scheme in the city centre was visited, then in the rest of the authority area, every scheme involving the creation of over five residential units was visited as well as a random sample of over half the smaller schemes, so that in total 126 sites were visited (70%). As Table 1 illustrates, in other authorities, we were not able to visit every site. This was sometimes because a building could not be viewed from the public highway, sometimes because there was some confusion over the exact site address, and sometimes because sites were difficult

to reach by public transport (and in the time available). Nevertheless, overall a strong 89% of sites were visited (639 buildings).

Table 1. Local authority site visit and case study selection data

Local authority	Prior approval schemes (number of site addresses) *	Planning permission schemes (number of site addresses) *	Total change of use scheme sites to visit *	Number of change of use scheme sites actually visited	Percentage visited	Number of schemes considered in desk-based research
Bristol	98	81	179	126	70%	41
Crawley	17	8	25	25	100%	10
Derby	24	34	58	58	100%	25
Enfield	68	5	73	73	100%	23
Huntingdonshire	22	6	28	28	100%	12
Manchester	37	7	44	42	95%	20
Richmond	87	21	108	103	95%	30
Sandwell	27	17	44	43	98%	20
Sunderland	8	30	38	38	100%	20
Wakefield	22	9	31	31	100%	14
Waverley	53	35	88	72	82%	25
Totals	**463**	**253**	**716**	**639**	**89%**	**240**

** - Note that it is not uncommon to have several prior approvals and/or permissions at the same address, hence these figures are in some cases smaller than the numbers listed in Table 10*

When conducting site visits, researchers sought to work out whether a scheme had been implemented or not (i.e. did the conversion to residential use appear to be in progress or completed), took a photograph of the building, and then completed a site visit proforma to capture an exterior assessment of the building (what is its location and surrounding uses, what type of building was it originally, have notable exterior changes been made).

In parallel to the initial data analysis and site visits, a suitable planning officer (or in some cases a couple of planners, often one more policy focussed and one more development management focussed) from each authority were interviewed, either face-to-face (if based in southern England) or via telephone. These 11 semi-structured interviews captured the LPA's perspective on change of use PDR, their perception of the quality of schemes seen locally, and how they handle such applications.

Following the site visits, a more detailed desk-based analysis of schemes was conducted. Due to time constraints, it was not possible to do this for all 639 buildings visited, but it was also decided that the further analysis would just be conducted on schemes which appeared to have been implemented, since it might be argued some other approvals were never actually intended to be built out (for example, being used in negotiations and land trading). In total, 240 schemes were subject to a detailed desk based, over a third of buildings visited, with the number of schemes selected being proportionate to the number of schemes per local authority.

138 of these schemes were classified during our initial data processing as prior approval schemes (92 office-to-residential, 33 retail/sui generis-to-residential and 13 storage/light industrial-to-residential) and 102 planning permission schemes (44 office-to-residential, 47 retail/sui generis-to-residential and 11 storage/light industrial-to-residential), reflecting the proportions of schemes actually implemented and allowing comparison between the two routes of consent. Many of the planning permission schemes seem to involve listed buildings.

For storage / light industrial-to-residential, there were so few implemented schemes that all of those were selected for detailed analysis. For office- and retail / sui generis-to-residential, a selection procedure was undertaken, selecting schemes for detailed analysis based on an aim to achieve a cross-selection of typical conversion types seen in that authority (based on the photographs and site visit results). The detailed desk-based research then looked at the submitted floorplans for the scheme (from local authority public access planning databases) to determine the number of bedrooms, the space standards and window arrangements; publicly available information on Energy Performance Certificate (EPC) performance and council tax banding for units; and any information available on market tenure (often not available). For 14 of the 139 PD schemes initially examined (10%), no floorplans were available and these schemes were replaced with alternatives from the same authority area. The schemes without floorplans were usually ones which had been determined as 'prior approval not required'.

When assessing schemes in relation to space standards, if unit sizes were stated on submitted plans, then we took this to be the unit size and then checked it against the standards in the Nationally Described Space Standard (NDSS) published in 2015.[24] For most PD schemes, the submitted plans did not state unit sizes, but plans were to scale and therefore we calculated unit sizes ourselves and compared this to the NDSS standards. The NDSS standards were used for all schemes investigated in this research, regardless of whether the LPA had adopted them into local policy or not, so as to provide a nationally consistent assessment of unit size. In applying the standard, most PD scheme plans reviewed did not specify the number of persons the unit was intended for or what the bathroom was like. We therefore assumed that a studio was a "1 bed, 1 person" unit with a shower-room, that a one bedroom flat was a "1 bed, 2 person" unit, and that a two bedroom flat was a "2 bed, 3 person" unit. In other words, we were taking the smallest possible size that any unit could have been and still met the NDSS standards. In assuming that a studio flat should be a minimum 37m^2, we were following the GLA's approach that this is the minimum size for any dwelling.[25] In assessing windows, this was as we were best able to determine from submitted floorplans.

It should be noted that in conducting this detailed desk analysis, a total of 50 schemes (40 of the 'prior approval' schemes and 10 of the 'planning permission' schemes) were found to have both one or more prior approvals relating to change of use and one or more planning permissions relating to change of use. This is different to those schemes that had a prior approval to allow the change of use and then a separate planning permission for associated work not permitted under a prior approval (e.g. extensive exterior works). Some of these had been identified earlier in data analysis since both the prior approval and planning permission applications for change of use were made 1 April 2015 – 31 March 2018 and were therefore on the lists provided to us by the local authorities, however some were not because one of the applications was made within this time period and one before or after it, and then found when searching the property site addresses in the local authority public access planning database during the detailed desk research.

These overlaps illustrate the complex relationships that exist on some schemes between the use of prior approvals and the use of planning permissions. In some cases, both exist because they relate to different parts of the same building (for example, different floors may be in different uses) or because a prior approval was refused, and a planning permission then submitted. In other cases, they cover the same building but with the prior approval being used for a 'fallback' position or bargaining tool in relation to the subsequent planning permission. For our analysis, we have tried to understand what has been approved most recently under each route and analyse accordingly, so that our data for comparison between the prior approval and planning permission routes is robust.

[24] 'Technical housing standards – nationally described space standards' at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

[25] 'Housing Supplementary Planning Guidance' at https://www.london.gov.uk/sites/default/files/housing_spg_final.pdf (page 81)

The desk-based analysis also involved a GIS analysis. This is based on the Ordnance Survey's Code Point data, drawing on:

- Neighbourhood Quality: The 2019 version of the Index of Multiple Deprivation is used. It is a composite index measuring both person- and area-based variables, ranking all English Lower Super Output Areas;
- Access to Open Space: This variable measures the average accessibility to publicly accessible green and blue space for each Lower Super Output Areas in England (green spaces including parks and recreational spaces, blue space including rivers, canals and lakes);
- Convenience Provision: This analysis establishes whether the postcode is located within 700 metres (walking distance) to a supermarket. A second variable establishes whether a scheme is within 700 metres to a mid-sized or large supermarket (larger than 280 square metres);
- Access to Public Transport: The Department for Transport provides National Public Transport Access Nodes (NaPTAN) for Great Britain. It allows us to establish whether the postcode of a scheme is located within 300 metres to a public transport stop (bus stop) or within 1 kilometre to a railway/metro/tram station. This does not allow for the frequency of services at the stop or station

Drawing on the applicant / agent data from the schemes subject to detailed analysis, developers and their agents (usually planning consultants), were approached for interview to try and gain a sense of their perspectives on PD, the determinants of scheme quality and about scheme viability. In total ten interviews took place, of which three were with developers and seven with planning consultants. Interview participants represented a broad cross section of development professionals active across the full national geography with each of the eight regions of England being represented by one interviewee (with the exception of the South West) and three active in London.

Finally, the LPAs were asked to confirm how much (if any) CIL contributions or Section 106 had been paid in relation to the detailed case study schemes examined in their area. This was then combined with data the University of Liverpool researchers have from work on *The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England*, which is a separate research project also funded by MHCLG.

4. Local economic indicators: an overview of case studies

Assessing current trends in economic, housing and real estate market indicators provides essential background context for our understanding of the local case study markets. The current population, (un)employment figures, and job density statistics shed light on the economic characteristics of the local markets against which this PDR change of use research is set. The interconnected trends in local economies of each case study, and their housing and real estate markets are detailed in this section through various tables and associated discussion. The section concludes with some initial suggestions as to how the influence of PDR in each local economy may be contextualised, and better understood, through interpreting market information.

Table 2. Labour force and economic activity 2018

Local Authority	Total Population	Population 16-64	Economically active	In employment	% Unemployed	Job Density *
Bristol	463,400	317,800	265,200	253,500	3.8	1.01
Crawley	112,400	72,700	60,400	56,700	3.3	1.41
Derby	257,200	161,300	128,100	121,600	5.0	0.89
Enfield	333,900	213,600	160,000	152,800	5.3	0.59
Huntingdonshire	177,400	109,500	94,000	90,400	2.8	0.75
Manchester	547,600	385,600	273,600	259,500	5.4	1.14
Richmond	196,900	124,700	108,500	105,200	3.5	0.86
Sandwell	327,400	204,100	155,200	147,000	5.3	0.72
Sunderland	277,400	174,500	136,100	124,800	6.9	0.76
Wakefield	345,000	214,100	166,900	158,200	4.5	0.79
Waverley	125,600	73,000	64,500	63,600	2.0	0.91

Source: NOMIS, Official Labour Market Statistics, Local Authority Profiles.[26]
** Job Density represents the ratio of the total jobs to resident population 16-64 indicating labour market supply and demand in a local authority, as calculated by NOMIS. Total jobs includes employees, self-employed, government-supported trainees and HM Forces.*

The capacity of a local economy to support fluid labour markets, whether they are growing or shrinking, or with a working age population (aged 16-64) expanding or contracting, can be considered through employment and job density statistics. Employment figures demonstrate how able local residents are to accrue income and therefore access different types of housing across varied tenures depending on income levels, and help indicate how local professions consume office, retail, sui generis and industrial / storage space for diverse purposes in the community in terms of demand and supply.

The differences across the eleven case studies are interesting in terms of the population differences in local authorities and the number of economically active residents, especially as the size of the population does not seem to be particularly impactful. In larger cities such as Bristol and Manchester you may expect the percentage of residents of working-age population to be greater due to the pull of employment, expansion and potential future growth. For our case studies this holds true, as they have the largest working-age populations as a percentage of total population, at 68.6% and 70% respectively. Across all the case studies the percentage of working-age populations are not dissimilar, and ranged only from 62.1% (Wakefield) to 70% (Manchester),

[26] 'NOMIS, Official Labour Market Statistics, Local Authority Profiles' at www.nomisweb.co.uk

demonstrating some degree of economic consistency in terms of population trends and demographics. However, when considering those of working-age who are economically active as a percentage of total population across case studies more stark differences appear across a larger spectrum of results. Bristol, the second largest case study by population, and Richmond, one of the smallest, have the highest percentages of economically active residents, at 57.2% and 55.1%. For these case studies the gap between working-age population and those who are economically active is moderate in percentage terms, at 11.4% for Bristol and 8.2% for Richmond. The starkest differences are in Manchester, with a gap of 20.1% and Sandwell at 14.9%, and the smallest gap in Waverley at 6.7%. Large differences, such as those in Manchester illustrate that a significant percentage of the working-age population are not economically active, as they are not seeking employment (such as students, carers or retired) or they are unemployed, actively seeking work or waiting to begin a period of employment.

Such findings could be linked to unemployment and job density statistics, also detailed in Table 2. A job density of one would reflect a perfectly balanced economy, with one job per working-age resident. A job density of over one indicates that there are more jobs per person (an oversupplied market in terms of workforce), whereas a density of less than one indicates fewer (where there is an undersupply of employment opportunities). In 2018, the job density of the UK was 0.85 overall, reflecting the fact that not everyone in the 16-64 working-age base would be actively seeking work or employed.[27] In line with the largest differences between working-age population and economic activity, Manchester and Sandwell also have high unemployment rates at 5.4% and 5.3% respectively, although Enfield's sits at 5.3% and Sunderland has the highest at 6.9%. Interestingly, Manchester has a high job density figure at 1.14, compared to Enfield (0.59), Sunderland (0.76) and Sandwell (0.72), which are each substantially lower than the UK average. This may indicate that the Manchester market currently has a lot more jobs available and has a more dynamic local labour market compared to the other locations. As a labour market, it is a regional centre as well as a thriving city, with a higher job density sitting alongside higher unemployment rates. There are clearly employment opportunities available, and potentially more churn in such economic centres, whereas in areas of low job density (such as Enfield), where unemployment is also high, there may be fewer opportunities and less churn in employment.

Higher job densities cannot be conflated with high unemployment rates. Crawley has one of the lowest unemployment rates at 3.3% and the highest job density at 1.41, so appears to be an oversupplied market in terms of potential employment, but this may indicate that there is a large amount of employment churn in hotspots for employment, such as Gatwick Airport. It may also indicate that people living in Crawley actually choose to work outside of their local authority, and that the jobs available are not necessarily attractive to them. Derby also has a higher than average job density at 0.89 with an unemployment rate of 5.0%. Waverley and Huntingdonshire have the lowest unemployment rates overall, at 2.0% and 2.8%, although Huntingdonshire's job density sits lower than the national average at 0.75. Job density is a useful indicator for the total jobs in a local authority relative to the local resident population, however it can only tell a limited story. As variation in the figures indicate, there are other influential factors active within local markets which can determine the job density figures – local market dynamics, residents choosing working in other local authorities, and that available jobs may disconnected from the local employment base. The broader contextual factors which may be considered in line with job density (such as unemployment), need to be better understood in relation to the nature of local market economics to further clarify the impacts of PDR.

Another useful economic indicator produced by the MHCLG are the English Indices of Deprivation (2019), mapped by Alasdair Rae at the University of Sheffield, which offer clarity on deprivation levels across local authorities, reflecting areas where these are more severe (with those ranked one the most severe deprivation decile, and those ranked 10 the least).[28] Deprivation is ranked in

[27] 'Labour Market Profile, Great Britain' at:
https://www.nomisweb.co.uk/reports/lmp/gor/2092957698/report.aspx
[28] ' MHCLG English Indices of Deprivation, 2019. Local Authority Maps' at:
https://imd2019.group.shef.ac.uk/

terms of income, employment, health, education and skills, crime, living environments and barriers to housing. In terms of our case studies, Sunderland, with its high rates of unemployment and lower job density, has 53.5% of the population falling into deciles 1-3, indicating significant levels of deprivation across the local authority. Sandwell has 74.2% of the population falling into the three lowest deciles, and Manchester has 74.5%. These figures compare drastically with figures for the lowest three deciles of deprivation in Waverley (2.4%), Richmond (2.6%) and Huntingdonshire (4.8%).

Although these figures tell a broad story, they offer insight into the characteristics of the local authorities economic base, which are key to employment (and therefore the real estate assets potentially subject to PDR change of use), and housing accessibility (in terms of market values and affordability). The following section considers the local housing market trends in more detail.

Housing market facts and figures

Considering the potential impact that PDR change of use may have on a local authority's housing market, it is important to understand the recent trends in transactions, pricing and affordability, which illustrate how the economic factors discussed in the previous section can be connected to, and manifest in, local housing markets.

The first table (Table 3) illustrates the price shifts in the local housing market, indicating the current average property price, along with percentage changes in the last three months, annually and over the last five years. These figures offer a useful overview to general historic trends in the housing market, and the direction in which values appear to be moving in the last twelve months. Table 4 looks at shifts in transactions – the volume of sales and purchases – in each local authority, from current and historic perspectives. The third table on housing, (Table 5) uses ONS statistics to consider changes in the house price ratio, which examines how the housing price changes can be expressed in relation to movements in earnings. These figures use median house prices, and median gross earnings, with the median reflecting the midpoint of all observed values per local authority. The change in house price to earnings ratio is a useful indicator of housing affordability in relation to incomes. Income levels can drive transactions, which in turn can drive changes in values. If values increase significantly, this can also diminish transactions as properties become less affordable. Therefore, the three tables are inherently connected in terms of what the reveal about the housing market trends in each local authority, and tends usually move in a cyclical fashion, with different markets experiencing changes in value at different speeds over varied time frames, as they move through peaks and troughs. However, as with the previous statistics on local economies, the figures can only tell part of the story, and context, as well as personal circumstances, have substantial impact on housing market trends.

As can be seen from Table 6, in the last five years all local authorities have experienced an increase in housing value. However, this is more muted in some authorities, such as Sunderland with an 8.2% increase (potentially due to lack of demand, combined with oversupply), compared to Manchester, where prices have risen 38.9%. As of October 2019, house prices are highest in the London borough of Richmond upon Thames, at £666,848, compared to the cheapest average house prices in Sunderland at £116,051. Unsurprisingly, the two London Borough's, Richmond and Enfield have the high average prices for housing, due to constrained supply and consistently active market demand in the capital. However, the value increase in Richmond is relatively low (only Sunderland has lower) in terms of percentage growth over five years, at 13.8%. This might indicate that the market has plateaued and there may be less supply coming into the market, therefore prices aren't as heavily impacted as in other areas. Outside of the capital, Waverley has the highest priced housing. The value shifts have been more marked in the last five years compared to smaller, single figure shifts across the last year. The housing market has slowed somewhat, with Wakefield experiencing the highest annual growth at 4.1% and three of the local authorities experiencing negative growth (Waverley, Enfield and Crawley).

Table 3. Housing market price changes per local authority

Local Authority	Local Authority Housing Market report - Average price change			
	Oct-19 *	3 months	Annual	5 Years
Bristol	£278,533	-0.6%	0.0%	37.8%
Crawley	£281,080	0.6%	-1.1%	32.1%
Derby	£159,261	0.3%	2.6%	20.9%
Enfield	£391,785	-0.6%	-1.2%	35.6%
Huntingdonshire	£260,365	0.0%	0.8%	34.8%
Manchester	£179,506	-0.1%	2.3%	38.9%
Richmond	£666,848	0.8%	0.2%	13.8%
Sandwell	£152,544	0.3%	3.4%	33.0%
Sunderland	£116,051	0.9%	1.3%	8.2%
Wakefield	£154,249	0.9%	4.1%	20.3%
Waverley	£460,288	0.5%	-1.7%	22.7%

Source: Built Place, Local Authority Housing Market Reports[29]
** Value average based on housing market changes up to September 2019*

Table 4: Housing Market Transaction Activity per Local Authority

Local Authority	Local Authority Housing Market report - Transaction activity				
	Oct-19 *	3 months	Annual	5 Years	10 years
Bristol	6,739	-4.3%	-10.0%	-16.0%	77.0%
Crawley	1,494	-5.0%	-2.2%	-7.1%	73.4%
Derby	3,317	-6.3%	-12.8%	-10.0%	36.7%
Enfield	2,407	-3.2%	-8.7%	-39.8%	79.3%
Huntingdonshire	2,901	-4.9%	-7.5%	-19.6%	62.6%
Manchester	6,040	-5.0%	-12.5%	-1.9%	54.9%
Richmond	2,480	-3.2%	-5.0%	-34.5%	82.9%
Sandwell	3,567	-2.3%	-4.3%	16.9%	42.9%
Sunderland	3,492	-3.5%	-1.7%	8.9%	4.6%
Wakefield	5,587	-3.5%	-3.8%	30.5%	19.7%
Waverley	1,808	-2.7%	-3.8%	-23.8%	66.0%

Source: Built Place, Local Authority Housing Market Reports[30]
** Transactions for the year between July 2018-2019*

As you would expect from Table 4, those case study locations with larger populations – Manchester, Bristol and Wakefield – have transacted the biggest volumes of housing across all case studies. Although transaction volumes have risen in all case studies in the last decade, and reflect increased demand for property ownership (for occupation or buy-to-let), the differences in volumes are substantial. Volumes in Richmond sit at 82.9% for the decade up to October 2019, whereas Sunderland sits at only 4.6%, even though Sunderland values have not fluctuated as much as in other local authority areas. The latter however, has seen greater volumes in the last five years, at 8.9%, compared to Richmond at -34.5%. Differences are exacerbated across longer timescales, and for all case studies transaction activity has been consistently decreasing in the last three months, and across the last year. Derby volumes are down 12.8% and Manchester 12.5% with less change experienced for the year in Crawley (-2.2%) and Sunderland (-1.7%). Transactions volumes are currently decreasing across all case study authorities, reflective of wider general trends in the UK's housing market: although property values have been plateauing slightly

[29] 'Built Place, Local Authority Housing Market Reports' at https://builtplace.com/resources/la-reports/
[30] 'Built Place, Local Authority Housing Market Reports' at https://builtplace.com/resources/la-reports/

in the last year (as per the price change table), fewer houses are being sold. The ability to purchase and transact housing is often connected to the local economic base, and reflected in statistics such as the house price and earnings ratio.

Table 5: Median House Prices and Earnings Ratio 2012 & 2018

Local Authority	Median House Price (£)		Median Gross Annual Residence based earnings (£)		House Price / Gross Annual Earnings ratio*	
	Sep-12	Sep-18	2012	2018	2012	2018
Bristol	£172,000	£265,000	£25,501	£29,046	6.74	9.12
Crawley	£186,000	£295,000	£27,216	£28,116	6.83	10.49
Derby	£122,725	£154,000	£27,211	£31,991	4.51	4.81
Enfield	£245,000	£400,000	£29,668	£31,945	8.26	12.52
Huntingdonshire	£180,000	£268,000	£28,522	£31,759	6.31	8.44
Manchester	£125,000	£170,000	£24,252	£25,660	5.15	6.63
Richmond	£425,000	£635,000	£41,051	£42,982	10.35	14.77
Sandwell	£110,000	£145,000	£22,516	£24,573	4.59	5.90
Sunderland	£107,902	£126,000	£22,642	£25,289	4.77	4.98
Wakefield	£119,000	£151,000	£22,815	£26,175	5.22	5.77
Waverley	£330,000	£475,000	£36,938	£40,161	8.93	11.83

Source: ONS[31]

As can be seen from the median house prices in Table 5, house prices have been consistently increasing across all local authorities. As can be seen from the median gross annual residents based earnings, the growth in income has been more substantial in some areas from 2012-2018 than in others, which has had an obvious impact on the house price ratio. Crawley's house price / earnings ratio has moved from 6.83 to 10.49, whereas Derby has only seen a small increase from 4.51 to 4.81. Therefore, Derby's housing market and local economic base are growing consistently but slowly, and in line with each other. Sunderland and Wakefield have had similar experiences. Whereas in Crawley, although there has only been a small increase in median earnings 2012-18, there has been a substantial growth in median house prices, potentially making it more unaffordable for residents and restricting their ability to move. This situation is reinforced by the housing market transaction figures for Crawley. Enfield and Richmond have also experienced greater growth in median house prices coupled with slower growth in earnings, making both markets increasingly unaffordable. Along with Waverley (11.83), Richmond (14.77) and Enfield (12.52), have the highest house price to earnings ratios, making them the least affordable.

Commercial real estate trends

Although housing units are being created by PDR change of use, and therefore contributing to the provision of residential units, this provision is at the expense of commercial real estate spaces in the market, predominantly in the retail and office markets, and some cases, from industrial and sui generis uses. The two tables considering the office and retail markets across the local authority, Table 6 and Table 7, reflect a number of important trends which could be facilitating the change of use in particular areas, especially those where rental levels and demand are low. This can be seen in certain office markets such as Derby and Crawley, where rental growth has been negative in the last 12 months, there isn't a great difference for occupiers between 3 star and 4/5 star rental values (compared to Enfield or Huntingdonshire), no new space has come onto the market and vacancy

[31] 'Ratio of house price to residence-based earnings (lower quartile and median), 2002 & 2018' at www.ons.gov.uk

rates are high (4.3% in Derby and 10.0% in Crawley). Other office markets, such as Manchester, are much more dynamic, and although it has an office vacancy rate of 5.8%, there is rental growth across the market at 4.6% for the last year, as well as encouraging new supply entering the market, and consistent demand for new office space, as demonstrated by the highest absorption rates across the local authorities. Bristol performs consistently well. Although there is not a huge amount of rental growth in places like Sunderland, space is cheaper for occupiers, but vacancy rates are higher at 4.4% and occupiers may be more inclined to avail of the new supply being delivered (based on CoStar data), therefore providing opportunities for the conversion of older office stock to residential.

Table 6: Commercial real estate trends: Office market

	12-month deliveries (Square feet)	**12-month Net Absorption** (Square feet)	**Vacancy Rate**	**12-month Rental Growth**	**Prime Rent (4&5-star offices, per square foot)**	**Rent (3-star offices, per squate foot)**
Bristol	240k	340k	3.60%	3.90%	£26.99	£19.57
Crawley	0	44.5k	10.00%	-1.80%	£26.39	£20.77
Derby	0	143k	4.30%	-1.40%	£16.06	£12.65
Enfield	0	11.5k	1.70%	-1.00%	£41.63	£23.82
Huntingdonshire	5.3k	70.9k	1.70%	0.20%	£25.42	£14.29
Manchester	473k	1.1m	5.80%	4.60%	£28.32	£16.30
Richmond	996	-137	2.90%	0.60%	£41.65	£33.84
Sandwell	0	41.2k	1.90%	1.10%	£18.67	£12.52
Sunderland	59.4k	47.5k	4.40%	0.40%	£12.96	£9.48
Wakefield	0	77.3k	2.30%	2.90%	£21.29	£11.34
Waverley	3.5k	-11.9k	2.60%	1.00%	-	£24.36

Source: CoStar[32]

The retail market throws up some curious differences – such as the values between shopping centre rents per square foot, and general retail.The latter is much more likely to be converted, and the market values in relation to shopping centres may have an impact on general retail conversion trends. In Bristol, Crawley, Waverley, Sunderland and Wakefield we can see significant differences in the value of shopping centre rents versus general retail. Waverley has the largest gap with shopping centres commanding £70.32 per square foot compared to general retailers at £24.55. On the flip side, Huntingdonshire general retail rent is more expensive than that of local shopping centres, and in Sandwell there is very little difference between the two types of retail space. However, for markets like Crawley with no new supply coming onto the market, with low absorption, low vacancy rates at 0.7% and 4.10% annual rental growth, general retail may prove a more attractive proposition than the potential opportunities associated with conversions. Considering the growth in retail vacancy rates across the UK in the last decade and the associated problems with the 'death of the high street', the retail vacancy rates across all of the case studies are surprisingly low, which may limit the number of conversions of this type, although rental growth over the last twelve months has been relatively limited (with the exception of Crawley). The opportunities to convert retail to residential are clearly linked to each local authority's current retail market, the rental value shifts and the retail mix. Value and place specific factors, such as supply and demand, will have direct impacts on how retail trends continue to develop.

[32] 'Market Analytics Data Comparables, November 2019' at www.costar.com

Table 7: Commercial Real Estate Trends: Retail Market

Local Authority	**12-month deliveries** (Square feet)	**12 month Net Absorption** (Square feet)	**Vacancy Rate**	**12-month Rental Growth**	**Shopping Centre Rent** (per square foot)	**General Retail Rent** (per square foot)
Bristol	86.3k	222k	1.10%	-3.30%	£49.23	£21.92
Crawley	0	8.4k	0.70%	4.10%	£48.69	£29.90
Derby	0	19.1k	1.80%	1.20%	£28.00	£16.37
Enfield	0	17.6k	1.50%	2.80%	£30.15	£29.26
Huntingdonshire	53.9k	43.1k	2.70%	2.90%	£13.95	£23.05
Manchester	421k	773k	1.50%	-3.30%	£37.37	£15.87
Richmond	0	37.3k	1.30%	1.30%	-	£41.63
Sandwell	0	69.7k	2.00%	1.20%	£19.47	£16.95
Sunderland	7.5k	-15k	2.30%	1.90%	£57.10	£14.41
Wakefield	2.2k	25.9k	2.60%	1.60%	£30.53	£16.07
Waverley	430	3.6k	0.90%	2.20%	£70.32	£24.55

Source: CoStar[33]

Establishing potential connections: local economies, housing and real estate markets

From the discussions above we can offer suggestions as to how extended change of use rights through PD, not just from offices, but also from retail, industrial and sui generis property into residential, may find expression across local authorities, and influence change. The following bullet points are suggestions to be revisited in our analysis and discussion in line with the findings of the research:

- The capacity for residents in a local authority to purchase housing is directly proportionate to both economic activity and employment, and negatively correlated with indices of multiple deprivation;
- The increase in housing provision gleaned from PDR conversions may dampen the local housing market by increasing supply, therefore pushing housing values down. However, this doesn't indicate that housing becomes any more affordable, with many conversions ending up as part of the PRS. This may be exacerbated in areas where housing is cheaper to purchase, but remains out of reach for many of those in employed in the local authority, even if they are economically active and house price ratios are lower;
- Across the real estate market, landlords and developers will capitalise on weaker markets where less desirable assets with constrained rental incomes can be converted to residential in order to maximise profits;
- For office markets, the conversions are more likely to 3-star quality or lower, rather than 4/5 star prime offices in desirable locations. Certain local authorities with weaker office markets will welcome such conversions, as it stimulates the economy and there is insufficient demand from occupiers, while those with thriving office markets will do their best to protect and retain all types of office space; and
- For retail conversions, areas where local high streets have been negatively impacted by the growth of shopping centres, will see more conversions of redundant retail space to residential units.

[33] 'Market Analytics Data Comparables, November 2019' at www.costar.com

5. Overview of permitted development in the case study authorities

This chapter provides an overview and comparison between the authorities in terms of the number and type of change of use schemes seen in them, combining the view from central government data (from MHCLG live tables), local government supplied data (from their planning databases) and from our own site visits (discussed further in Appendix 1 – Appendix 11).

In terms of MHCLG live tables data, on Table 8 and Table 9, it gives an overview of the data recorded for the number of prior approvals received for each of our case study local authorities over the period 1 April 2015 – 31 March 2018 and the net additional dwellings created from relevant change of use PD schemes over the same period.

Table 8: Applications for prior approvals by PD type for each LPA

	Office				**Retail and sui generis**				**Storage / light industrial**				**Total**			
	Granted	Refused	Not required	Total	Granted	Refused	Not required	Total	Granted	Refused	Not required	Total	Granted	Refused	Not required	Total
Bristol	91	23	0	114	24	6	0	30	1	0	0	1	116	29	0	145
Crawley	28	18	5	51	0	0	0	0	0	0	0	0	28	18	5	51
Derby	21	0	2	23	4	0	1	5	0	0	0	0	25	0	3	28
Enfield	8	24	34	66	5	19	17	41	0	0	0	0	13	43	51	107
Huntingdonshire	23	1	1	25	0	0	0	0	6	0	1	7	29	1	2	32
Manchester	36	10	0	46	9	1	21	31	2	0	0	2	47	11	21	79
Richmond	81	46	0	127	7	3	0	10	0	0	0	0	88	49	0	137
Sandwell	5	0	17	22	6	2	5	13	0	0	0	0	11	2	22	35
Sunderland	5	1	1	7	0	0	1	1	0	0	0	0	5	1	2	8
Wakefield	10	8	17	35	0	0	0	0	0	0	0	0	10	8	17	35
Waverley	27	12	19	58	7	1	3	11	1	5	0	6	35	18	22	75

Source: Live tables[34]

The information on prior approvals on Table 8, aggregates the data available for the relevant trimesters for the period between April 2015 and March 2018 from the Live tables on planning applications statistics. The information on potential additional dwellings, on Table 9, similarly available on Live tables, results from adding the available categories of change of use to residential for 2015-16, 2016-17 and 2017-18 for each relevant local authority.

A similar general picture – albeit with much more detail – is provided in Table 10, which draws on LPA data (from their planning databases) shared with the research team and our subsequent site visits. During the time period considered, at the aggregate level of the 11 local planning authorities (LPAs) analysed, there was a greater number of notifications for use change through permitted development (PD) – also referred to as prior notifications – than through full planning application (FPA). In total, from the 1,023 schemes covered in this research, 652 came from a PD route and 371 from FPA (Table 10). At the aggregate level the number of PD schemes was 1.75 greater than the number of FPA schemes.

[34] https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing

Table 9: Net additional dwellings from PD for each LPA

	Agricultural to residential	Office to residential	Storage and light industrial to residential	Any other to residential	Unspecified to residential	Total to residential
Bristol	0	1030	0	8	0	1038
Crawley	0	589	0	3	0	592
Derby	0	471	0	0	0	471
Enfield	0	382	0	2	0	384
Huntingdonshire	14	159	3	4	0	180
Manchester	0	497	0	0	0	498
Richmond	0	529	2	4	0	535
Sandwell	0	161	0	4	7	172
Sunderland	0	220	49	25	0	294
Wakefield	0	222	0	0	0	222
Waverley	0	227	31	10	6	274

Source: Live tables[35]

At the level of the individual LPAs, the number of PD schemes was greater than FPA schemes for all but two local authorities (Derby and Sunderland) (Table 10). Bristol with 141 PD and 120 FPA schemes was, by far, the LPA with the greatest number of use change schemes. By number of PD cases, next were the LPAs from London and South East England, Richmond (99 PD, 21 FPA), Enfield (89 PD, 18 FPA), Waverly (78 PD, 61 FPA), and Crawley (49 PD,14 FPA). Other LPAs with a greater number of PD than FPA included Manchester (49 PD, 7 FPA), Sandwell (42 PD, 23 FPA), Huntingdonshire (38 PD, 6 FPA) and Wakefield (32 PD, 9 FPA). Finally, the two LPAs with a lesser number of PD than FPA, were Derby (27 PD and 62 FPA) and Sunderland (8 PD and 30 FPA), which were also the LPAs with the least number of PD applications. Number PD was greater than FPA in nine of the 11 LPA studied, with the greatest disparity found in Manchester and Huntingdonshire, where there were six times more PD than FPA applications for use change.

From the three categories of use change analysed both for PD and FPA, office-to-residential conversions were the prevailing category followed by retail-to-residential and light industrial/storage-to-residential. For PD, there were 497 prior notifications for office-to-residential conversions, contrasting with 104 for retail-to-residential and 51 for light industrial/storage-to-residential. For FPA, there were 187 schemes submitted for office-to-residential conversions, followed by 156 retail-to-residential and 28 light industrial/storage-to-residential use change (Table 10).

Comparing number of units proposed through PD and FPA shows a clear predominance of PD, with 8,036. units, over FPA, with 1,564 units (number of units known, as data missing for some cases, both for PD and FPA). As noted, in terms of number of schemes, the incidence of PD route schemes was 1.75 greater than FPA schemes (respectively 652 and 371). When comparing number of units this figure rises to 5.14. This shows that the average number of units per scheme is greater in PD than in FPA at the aggregate level of the 11 LPAs. This also applies at the individual level for 10 of the 11 LPAs studied, with Richmond with the similar average number of units for PD and FPA. Some of the more evident cases were Bristol where there was on average 23 units per scheme in PD and three per FPA and Manchester with 19 in PD and two units in FPA on average.

[35] https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing

Table 10: Overview of notifications and conversions through PD and FPA by LPA

Local authority and Use Change Type	1. Notification (schemes)	2. Granted (schemes)	3. Refusals	4. Not required	5. Withdrawals	6. Other	7. Approvals (includes granted and not required)	8. Approvals (%)	9. Visited schemes	10. Implemented (schemes)	11. Implemented schemes (% of visited)	12. Notifications with number of units known	13. Notifications (units)	14. Average number of units (from notification)	15. Granted schemes with number of units known	16. Granted (units known)	17. Average number of units (from granted)	18. Implemented schemes with known number of units	19. Implemented units
Bristol	(South West, Large Urban)																		
Prior Aprovals (total)	141	104	23	0	14	0	104	74%	69	46	67%	74	1715	23	58	1305	23	29	240
PD off-resi	105	77	19	0	9	0	77	73%	43	31	72%	56	1691	30	44	1285	29	18	222
PD retail-resi	29	21	4	0	4	0	21	72%	20	12	60%	14	16	1	11	13	1	9	16
PD ind-resi	7	6	0	0	1	0	6	86%	6	3	50%	4	8	2	3	7	2	2	2
Planning Applications (total)	120	88	20	0	12	0	88	73%	57	47	82%	109	275	3	81	207	3	37	92
off-resi	46	38	6	0	2	0	38	83%	17	16	94%	43	126	3	36	106	3	12	39
retail-resi	56	40	9	0	7	0	40	71%	32	27	84%	50	112	2	37	90	2	22	49
ind-resi	18	10	5	0	3	0	10	56%	8	4	50%	16	37	2	8	11	1	3	4
Crawley	(South East, Other Urban, Article 4(s))																		
Prior Aprovals (total)	49	24	20	5	0	0	29	59%	17	5	29%	49	2302	47	24	1410	59	5	282
PD off-resi	47	23	19	5	0	0	28	60%	17	5	29%	47	2299	49	23	1408	61	5	282
PD retail-resi	2	1	1	0	0	0	1	50%	0	0	0%	2	3	2	1	2	2	0	0
PD ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Planning Applications (total)	14	12	2	0	0	0	12	86%	8	2	25%	14	593	42	11	541	49	2	9
off-resi	10	8	2	0	0	0	8	80%	5	1	20%	10	579	58	7	527	75	1	1
retail-resi	4	4	0	0	0	0	4	100%	3	1	33%	4	14	4	4	14	4	1	8
ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Derby	(East Midlands, Other Urban)																		
Prior Aprovals (total)	27	24	0	3	0	0	27	100%	24	14	58%	26	728	28	23	598	26	9	11
PD off-resi	23	21	0	2	0	0	23	100%	21	11	52%	23	725	32	15	596	40	5	8
PD retail-resi	4	3	0	1	0	0	4	100%	3	3	100%	3	3	1	5	2	0	4	3
PD ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	2	0	0	0	0
Planning Applications (total)	62	35	5	0	1	0	35	56%	34	25	74%	28	189	7	22	165	8	17	88
off-resi	46	0	3	0	1	0	0	0%	19	14	74%	19	84	4	15	66	4	10	73
retail-resi	14	12	2	0	0	0	12	86%	13	9	69%	7	101	14	5	95	19	6	13
ind-resi	2	0	0	0	0	2	0	0%	2	2	100%	2	4	2	2	0	0	1	2
Enfield	(London, Major Urban)																		
Prior Aprovals (total)	89	45	0	44	0	0	89	100%	68	39	57%	83	407	5	40	142	4	28	47
PD off-resi	47	13	0	34	0	0	47	100%	39	23	59%	43	330	8	10	83	8	17	30
PD retail-resi	33	24	0	9	0	0	33	100%	24	13	54%	31	52	2	22	35	2	8	13
PD ind-resi	9	8	0	1	0	0	9	100%	5	3	60%	9	25	3	8	24	3	3	4
Planning Applications (total)	18	4	7	0	2	5	4	22%	5	3	60%	16	27	4	4	4	1	3	4
off-resi	10	1	4	0	0	5	1	10%	1	0	0%	8	9	1	1	1	1	0	0
retail-resi	8	3	3	0	2	0	3	38%	3	3	100%	8	18	2	3	3	1	3	4
ind-resi	0	0	0	0	0	0	0	0%	1	0	0%	0	0	0	0	0	0	0	0
Huntingdonshire	(East of England, Rural 80)																		
Prior Aprovals (total)	38	28	1	2	7	0	30	79%	22	15	68%	23	137	6	21	129	6	13	94
PD off-resi	23	19	1	1	2	0	20	87%	16	11	69%	15	121	8	14	115	8	9	89
PD retail-resi	1	0	0	0	1	0	0	0%	0	0	0%	1	2	2	0	0	0	4	5
PD ind-resi	14	9	0	1	4	0	10	71%	6	4	67%	7	14	2	7	14	2	0	0
Planning Applications (total)	6	6	0	0	0	0	6	100%	6	4	67%	3	4	1	4	4	1	4	4
off-resi	2	2	0	0	0	0	2	100%	2	2	100%	1	1	1	1	1	1	2	2
retail-resi	2	2	0	0	0	0	2	100%	2	0	0%	1	2	2	1	2	2	2	2
ind-resi	2	2	0	0	0	0	2	100%	2	2	100%	1	1	1	1	1	1	0	0

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Manchester	(North West, Major Urban, Article 4(s))																		
Prior Aprovals (total)	49	43	4	0	2	0	43	88%	36	25	69%	42	814	19	37	793	21	13	65
PD off-resi	45	39	4	0	2	0	39	87%	33	23	70%	41	813	20	36	792	22	11	63
PD retail-resi	3	3	0	0	0	0	3	100%	3	1	33%	1	1	1	1	1	1	1	1
PD ind-resi	1	1	0	0	0	0	1	100%	1	1	100%	0	0	0	0	0	0	1	1
Planning Applications (total)	7	7	0	0	0	0	7	100%	6	6	100%	6	15	3	7	14	2	4	10
off-resi	4	4	0	0	0	0	4	100%	3	3	100%	3	10	3	4	9	2	1	5
retail-resi	3	3	0	0	0	0	3	100%	3	3	100%	3	5	2	3	5	2	3	5
ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Richmond	(London, Major Urban, Article 4(s))																		
Prior Aprovals (total)	99	99	0	0	0	0	99	100%	84	62	74%	96	365	4	96	365	4	51	213
PD off-resi	83	83	0	0	0	0	83	100%	72	52	72%	80	331	4	80	331	4	43	199
PD retail-resi	8	8	0	0	0	0	8	100%	6	4	67%	8	15	2	8	15	2	4	8
PD ind-resi	8	8	0	0	0	0	8	100%	6	6	100%	8	19	2	8	19	2	4	6
Planning Applications (total)	21	21	0	0	0	0	21	100%	19	13	68%	21	93	4	21	93	4	12	64
off-resi	11	11	0	0	0	0	11	100%	9	6	67%	11	62	6	11	62	6	5	49
retail-resi	10	10	0	0	0	0	10	100%	10	7	70%	10	31	3	10	31	3	7	15
ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Sandwell	(West Midlands, Major Urban)																		
Prior Aprovals (total)	42	8	7	21	6	0	29	69%	26	17	65%	39	336	9	12	231	19	14	103
PD off-resi	28	7	2	17	2	0	24	86%	21	14	67%	26	307	12	7	224	32	11	98
PD retail-resi	12	1	4	4	3	0	5	42%	5	3	60%	11	24	2	5	7	1	3	5
PD ind-resi	2	0	1	0	1	0	0	0%	0	0	0%	2	5	3	0	0	0	0	0
Planning Applications (total)	23	18	2	0	3	0	18	78%	17	9	53%	22	64	3	17	49	3	5	6
off-resi	6	3	1	0	2	0	3	50%	2	1	50%	6	20	3	3	11	4	0	0
retail-resi	14	12	1	0	1	0	12	86%	12	8	67%	13	34	3	11	28	3	5	6
ind-resi	3	3	0	0	0	0	3	100%	3	0	0%	3	10	3	3	10	3	0	0

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
Sunderland	(North East, Major Urban)																		
Prior Aprovals (total)	8	5	0	3	0	0	8	100%	8	6	75%	7	265	38	7	265	38	4	80
PD off-resi	6	5	0	1	0	0	6	100%	6	5	83%	5	263	53	5	263	53	2	78
PD retail-resi	2	0	0	2	0	0	2	100%	2	1	50%	2	2	1	2	2	1	2	2
PD ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Planning Applications (total)	30	27	3	0	0	0	27	90%	30	24	80%	17	202	12	27	222	8	17	51
off-resi	16	14	2	0	0	0	14	88%	16	13	81%	16	201	13	14	192	14	6	21
retail-resi	13	12	1	0	0	0	12	92%	13	10	77%	1	1	1	12	27	2	10	25
ind-resi	1	1	0	0	0	0	1	100%	1	1	100%	0	0	0	1	3	3	1	5
Wakefield	(Yorkshire and the Humber, Significant Rural)																		
Prior Aprovals (total)	32	12	8	10	2	0	22	69%	22	14	64%	19	172	9	7	7	1	14	150
PD off-resi	32	12	8	10	2	0	22	69%	22	14	64%	19	172	9	7	7	1	14	150
PD retail-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
PD ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Planning Applications (total)	9	9	0	0	0	0	9	100%	9	7	78%	5	7	1	6	7	1	7	10
off-resi	2	2	0	0	0	0	2	100%	2	2	100%	1	2	2	1	2	2	2	4
retail-resi	7	7	0	0	0	0	7	100%	7	5	71%	4	5	1	5	5	1	5	6
ind-resi	0	0	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0	0	0	0
Waverley	(South East, Rural 50, Article 4(s))																		
Prior Aprovals (total)	78	37	20	21	0	0	58	74%	41	22	54%	75	795	11	37	272	7	18	89
PD off-resi	58	28	12	18	0	0	46	79%	34	15	44%	58	771	13	28	257	9	11	75
PD retail-resi	10	6	1	3	0	0	9	90%	6	6	100%	10	14	1	6	9	2	6	10
PD ind-resi	10	3	7	0	0	0	3	30%	1	1	100%	7	10	1	3	6	2	1	4
Planning Applications (total)	61	44	13	0	0	0	44	72%	31	19	61%	29	95	3	16	63	4	17	53
off-resi	34	22	11	0	0	0	22	65%	15	10	67%	21	84	4	10	45	5	10	45
retail-resi	25	21	4	0	0	0	21	84%	15	9	60%	9	22	2	6	18	3	8	10
ind-resi	2	1	1	0	0	0	1	50%	1	1	100%	1	1	1	0	0	0	0	0

Local authority and Use Change Type	1. Notification (schemes)	2. Granted (schemes)	3. Refusals	4. Not required	5. Withdrawals	6. Other	7. Approvals (includes granted and not required)	8. Approvals (%)	9. Visited schemes	10. Implemented (schemes)	11. Implemented schemes (% of visited)	12. Notifications with number of units known	13. Notifications (units)	14. Average number of units (from notification)	15. Granted schemes with number of units known	16. Granted (units known)	17. Average number of units (from granted)	18. Implemented schemes with known number of units	19. Implemented units
Totals	(11 case studies)																		
Prior Aprovals (total)	652	429	83	109	31	0	538	83%	417	265	64%	533	8036	15	362	5517	15	198	1374
off-resi	497	326	65	88	17	0	414	84%	324	204	63%	413	7823	19	269	5361	20	146	1294
retail-resi	104	67	10	19	8	0	86	83%	69	43	62%	83	132	2	61	86	1	41	63
ind-resi	51	35	8	2	6	0	37	73%	25	18	72%	37	81	2	31	70	2	11	17
Planning Applications (total)	371	271	52	0	18	5	271	73%	222	159	71%	271	1564	6	216	1369	6	125	391
off-resi	187	106	29	0	5	5	105	56%	91	68	75%	140	1178	8	103	1022	10	49	239
retail-resi	156	126	20	0	10	0	126	81%	113	82	73%	110	345	3	97	318	3	72	143
ind-resi	28	17	6	0	3	2	17	61%	18	10	56%	23	53	2	15	25	2	5	11
Aggregated Total	1023	700	135	109	49	5	809	79%	639	424	66%	804	9600	12	578	6886	12	323	1765

Source: Data provided by the LPAs and gathered through field work

When considering office-to-residential conversions, in Bristol and Manchester, the average number of units per scheme was 10 times greater in PD than in FPA (Bristol with an average of 30 units in PD and three in FPA, and Manchester with 20 in PD and three in FPA). Other LPAs with significant greater figures include Enfield and Huntingdonshire both with eight units in PD and one in FPA on average. In Crawley three very large duplicate applications—different proposals for the same space— are accountable for 510 of a total of 579 office-to-residential units use change requests through FPA. When discounting these duplicates, and similarly to all other LPAs studied (except from Richmond) the average number of units per scheme in Crawley was greater in PD than in FPA. Richmond is the exception, and despite showing a great number of PD units over FPA at the aggregate level of all use changes considered, as noted before, when considering office-to-residential conversion only, the average is four in PD and six in FPA.

A possible explanation for the predominance of a greater number of units in PD schemes across the LPAs explored could be that, all other things being equal, units in PD schemes are smaller (allowing for more units in similar size buildings). A note of caution interpreting this potential insight. It should be noted that there were data missing on number of units for some schemes, both for PD and FPA schemes, which limits our level of certainty. There are also alternative potential explanations for this insight. First, PD schemes could occur more predominately in larger size buildings (which would allow accommodating the additional number of units that PD schemes show on average). Second, it is possible that schemes with a greater number of units predominantly follow a PD route. Schemes with greater number of units have an additional economic incentive to follow a PD route, avoiding the almost certainly required contributions for affordable housing and other Section 106 agreements. Schemes with less than 10 units are often not required to contribute for affordable housing or other significant contributions under Section 106 agreements, whereas schemes with a greater number of units almost certainly do. There is thus an economic incentive for applicants of schemes with greater number of units to follow a PD route, avoiding planning gain which might explain our skewed result. A combination of these explanations is also possible. This aspect is explored in greater detail following a case study approach in the relevant part in this report.

At the aggregate level, approval rates in PD were 83%, and 73% in FPA. PD approval rates include the category ‘not required’, a category used in PD in eight of the 11 LPAs analysed (Crawley, Enfield, Huntingdonshire, Waverley, Derby, Sandwell, Sunderland, Wakefield), as these are conversions that, similarly to ‘granted’, have the potential to be implemented. At the individual level, four LPAs had 100% approval rates: Enfield, Richmond, Derby and Sunderland, but Richmond shows a 100% because data on refused cases was not supplied to the research team. The lowest approval rates were in Crawley (59%) Sandwell (69%) and Wakefield (69%). In terms of the different use changes and different application route, approval rates were higher in PD than FPA for all three use change categories, office-to-residential (83% comparing with 57% in FPA), retail-to-residential (83% in PD, 81% in FPA), and light industrial/storage (73% in PD, 61% in FPA).

It is difficult to isolate any standout explanations for the differing approval / refusal rates. There does not seem to be a particular association with local real estate market performance (Table 3 to Table 7). It may partly simply be a reflection of the sort of schemes being proposed in certain areas, which is often closely linked to the stock of available buildings and the characteristics of a place (some areas are more susceptible for flooding, have more contaminated land, or have seen larger office-to-residential conversions more likely to have significant highways impacts, all of which are common reasons for refusal). There may also be an influence from the LPA’s culture and robustness, as some seem to look at prior approvals with more detail than others (for example, checking if buildings are actually in the use class that is being claimed, and treating things as ‘prior approval required and granted’ as opposed to ‘prior approval not required’).

In terms of implemented schemes, our site visits suggest implementation rates of 64% for PD (265 implemented in 417 visited) and 71% for FPA (159 implemented in 222 visited) (measured as perceived implemented or in progress schemes compared to the number of visited schemes, which are all allowed rather than refused schemes). Within PD, 77% conversions resulted from office-to-residential use change, 16% from retail-to-office and 7% from light industrial/storage. Within FPA, 43% conversions were from offices, 52% from retail and 6% from light industrial/storage. This

indicates that, in terms or implementation, the greatest number per use change for the time period analysed was office-to-residential, both for PD and FPA, followed by retail-to-residential and light industrial/storage, in line with the results found when analysing PD and FPA applications.

Retail-to-residential conversions implemented were limited, despite being the second greatest implemented use change, and this type of PD was found only in urban local authorities. This includes Bristol with 12 implemented schemes, Enfield with 13, Waverly with six, other LPAs with less than five and Crawley, Huntingdonshire and Wakefield with zero. In terms of FPA, only two LPAs had a double-digit figure for retail-to-residential implemented conversions, Bristol (27) and Sunderland (10). The number of implemented light industrial/storage-to-residential conversions were low across all LPAs both for PD and FPA. The maximum number of implemented schemes per LPA was six, five LPAs had no implemented PD and six had no implemented FPA. Crawley, Sandwell and Wakefield had neither PD or FPA implemented schemes and Manchester had one PD implemented only.

The highest PD implementation rates occurred in Richmond (74%) and Sunderland (75%), respectively with 62 and six schemes. It is important to note that these two LPAs had the highest and the lowest housing market price from our cases (see Table 3), which seems to limit an explanation of PD implementation based only on real estate fundamentals. Additionally, in Richmond 46% conversions were from original residential buildings, whereas in Sunderland most conversions were from original 1950s-70s office buildings. Evidence that implementation rates could be explained by the original use of the buildings was not evident through this research. With a low implementation rate, Crawley (29%), was actually the LPA with the highest office vacancy rate from the 11 LPAs analysed (see Table 6). Together these cases suggest that PD implementation rates might not be easily explained by market fundamentals, nor technical considerations to do with the original use of the buildings, and that they are more likely to be explained by the individual circumstances of their development agents.

In terms of units our results show that from the total of 1,765 units identified as implemented at the aggregate level, 1,374 units followed a PD route and 391 a FPA route. This means that in terms of units, 78% implemented use change resulted from PD and 22% from FPA. Within PD conversions, units implemented came 94% (1,294 units) from the conversion of office space, and only 5% (63) from retail, and 1% (17) from light industrial/storage conversions. Within FPA, conversions from retail use played a more significant role with 37% conversions (143 units), closer to the 61% from office conversions (239 units). Conversions from light industrial/storage-to-residential corresponded to 3% (11 units).

We now explore our case study data in greater depth, in a chapter presenting a national overview from across all 11 case studies. A detailed discussion of each case study in turn is also included as Appendix 1 – Appendix 11.

6. National overview of findings from our eleven case studies

In this chapter, we present an overview of data from all 11 of our case studies in relation to:

- Local authority perspectives (summarised from interview data with planners)
- Site visit assessment of quality (summarised from 639 buildings visited to make an external judgement of scheme implementation, location and exterior alterations)
- Desk based assessment of quality (summarised from 240 buildings for which detailed investigations were conducted of publicly available information on the scheme)

We then draw from across these data sets to consider the relationship between locality and residential quality. The data which inform this national overview are available in a more detailed discussion of each of the eleven case study local authorities in turn, which form Appendix 1 – Appendix 11 of this report.

Understanding local authority perspectives

All of the local planning officers interviewed had concerns about PDR, usually most acutely in concern to the quality of developments that were being produced through it, in particular in relation to office-to-residential conversion. In the majority of LPAs, such PD was seen as a significant issue locally. PD had been seen as a high profile issue in Manchester and Richmond from its introduction and was becoming a growing issue for authorities in Enfield and Waverley, with local councillors driving work on Article 4 Directions. It is worth noting, however, that Houses in Multiple Occupation (HMOs) were seen as a greater issue in Wakefield and in Sunderland, whilst there had been concerns about a few specific schemes, it was not seen as a pressing issue (this may relate to the low overall rate of prior notifications seen there).

There was some concern about PD in relation to the loss of employment space in Manchester, Richmond and Waverley, particularly given the latter two relied on small, town centre type office space for much of their employment land and such buildings were seen as particularly vulnerable to conversion. Elsewhere, however, in Sandwell, Sunderland and Wakefield, there was a view that PD had primarily led to the productive reuse of mainly vacant commercial buildings, often in urban locations. In Bristol, there was a view that the office market was sufficiently buoyant to protect employment space in the city centre but there were issues in more peripheral locations. This concern is therefore quite context dependent.

More universal was concern about the quality of residential developments delivered. Office-to-residential conversions were often the cause of most concern from the types of PD seen. There were widespread concerns about the small space standards of units seen with some PD conversions, but also the layout (for example, strange ‘dog-leg’ shaped units in larger floorplate buildings to work around windows and structural constraints) and access to daylight. Space standards were considered as a material consideration in most LPAs in relation to fully planning permissions, even if not formerly adopted in a Development Plan Documents (DPD) policy (the NDSS were apparently under consideration as part of the preparation of new local plans in Enfield, Manchester, Sunderland, Wakefield and Waverley). A lack of amenity space was mentioned frequently, particularly if schemes were in dense town centre locations.

The location of some specific PD conversions could also be perceived as problematic. In Crawley and Sunderland, this related to the functional separation of new towns (Washington, in the case of Sunderland), and both had seen conversions in the middle of commercial and industrial areas which were felt to offer a low level of residential amenity but also where residential use might negatively impact neighbouring commercial occupiers. In Huntingdonshire, there was particular concern about conversions in isolated rural areas which were seen as unsustainable locations, with poor access to

services. There were some locations and buildings where the LPA would apparently have been unlikely to have agreed the principle of a change of use to residential if a full planning application had been submitted instead of a prior approval, but these were a minority of schemes overall. There were also some locations where there may have been a desire to protect employment space, but in most cases LPAs were supportive of the principle of change of use to residential but rather more concerned with design related issues. Concerns mentioned in some places were the exterior appearance of buildings and lack of ability to have them meet the local vernacular (in Waverley) and concerns over the insulation and energy performance of some PD conversions.

A number of interviewees expressed concern in relation to the future occupiers of PD conversions, and management issues with them. Issues associated with temporary housing use were mentioned. In Crawley, this was linked back to design issues as it was felt that the scale of some large office conversions seen there, with so many very small sized units and no access to amenity space, then reinforced issues related to the use of these conversions as temporary housing and led to greater anti-social behaviour and impacts on local social infrastructure.

There were fairly frequent concerns about loss of potential Section 106 contributions, particularly affordable housing, which cannot be gained from PD schemes. In relation to affordable housing provision, however, it was acknowledged by some planners, such as in Enfield and Waverley, that the lower quality of some PD units has actually meant they have been offered at slightly more affordable prices than planning permission conversions.

In terms of advantages of PD, no design or residential quality related positives were reported in any of our case studies. In most, however, there was an acknowledgement that PDR had contributed to local housing supply. Indeed, in Huntingdonshire, PD conversions were an explicit part of meeting the locally objectively assessed need and had been recognised as such in their recently adopted new local plan. Whilst smaller change of use schemes had often occurred before PDR, larger conversions were rare and had now become more common across most authorities. It was also often noted that PD conversions could usually be implemented more quickly than planning permissions, so bringing housing supply forward more quickly. It is worth noting, however, that it was suggested in Manchester that the size and type of units seen through PD did not fully correspond to local housing need and in Wakefield it was felt that the PD contribution to housing supply was unnecessary as they were meeting their targets without it.

Attitudes to Article 4 Directions were variable between case study authorities. In some authorities, such as Derby and Sunderland, it was felt that there was no strategic need to protect employment space and so there was no need to consider one. In other authorities, such as Richmond and Manchester, whilst the Article 4 directions there were seen as necessary to protect employment space, they were also seen as helping the LPA be able to secure better quality residential design. Other authorities, such as Enfield, had been cautious about considering an Article 4 after being refused an applied for exemption when office-to-residential PD was first introduced in 2013, albeit work to introduce an Article 4 was currently underway there (as it was in Crawley and Waverley, as well, building on existing ones). In general, Article 4 Directions seem most common in London and the south of England compared to other regions (see list in Appendix 12) and our case study authorities reflect this pattern. This may be related to perceived housing pressures and employment land availability.

Concerns about the resource required to produce an Article 4 direction, with robust supporting evidence, were reported as an issue in some LPAs. More widespread was concern about the resource implications of the prior approval system. The time limited nature of process (with extensions for the time taken to determine now not allowed, even if agreed between LPA and applicant, following a court decision in 2019) and comparatively low fee were reported as an issue given the work for authorities in properly assessing notifications. This could be an issue when there could be quite complex interactions between prior approvals and full planning permissions for some schemes (as reported in Bristol).

The handling of prior approvals was reported to have become increasingly complex for LPAs, with 'burgeoning case law' surrounding them. The GPDO was felt to be complicated and so difficult for a range of stakeholders to understand compared to the much longer established system of full planning permission. In Huntingdonshire, Sunderland and Waverley, it was reported that LPAs had a statutory duty to consider ecological impacts of conversions (particularly given protected sites / zones in Sunderland and Waverley) even though they had not initially been clear that this was something they should consider in prior approvals (it being specified in the general provisions of the GPDO as opposed to in the list of specific things to consider for each category of change of use PD). This added to the workload associated with assessing schemes for issues that the LPA needed to consider for a low fee and short timeframe compared to planning applications. There were frequent concerns about the quality of supporting information supplied with PA applications.

There was a clear inconsistency between case studies over the handling of prior approvals in relation to the use of 'prior approval required and granted' and the use of 'prior approval not required' (both of which have the effect of allowing the conversion to go ahead). Different explanations were given around this. For example, in Enfield we were told that 'prior approval not required' used to be used quite frequently but they had had internal debate within the LPA and changed their approach. In Sunderland, we were told that they would use 'prior approval not required' if the scheme was acceptable without any mitigation needing to be secured in areas the Council could consider. In other authorities, it seemed to be an issue of local culture to want to exert as much control as allowed, and therefore to always use 'prior approval required and granted'. The difference in the rates of use of 'prior approval not required' is apparent looking at data in Table 10.

There had been an evolution over time in most of the LPAs over the use of conditions in relation to prior approvals. It was reported to us several times that initially there had been a view that they could not be used, but it had now become the usual way to ensure mitigation in relation to issues such as flooding and land contamination that the LPA can consider. This might be to ensure that a suggested mitigation measure is actually implemented (for example highways or flooding) or to require further consents be sought if certain circumstances are found during scheme implementation (for example ecology or land contamination).

None of the authorities interviewed had sought a Section 106 agreement in relation to a prior approval, and it was generally held that this was not something thought possible. Where there was a CIL schedule in place, authorities were well aware of their ability to charge this in theory on PD conversions but it was reported that in practice that this was usually avoided by the claim that the building had been in lawful use for at least six months out of the past three years before conversion. This was despite a number of planners reporting, for example in Derby, that they felt PD conversions were having an impact on local infrastructure (particularly social infrastructure).

There was a generally low awareness about Building Regulations compliance in relation to PD conversions. We were told several times that these sort of conversions usually went through Approved Inspectors outwith the LPA and that for this reason there had been no Building Control issues which had come to the attention of local planners. There was speculation in Huntingdonshire about how the M4 accessibility standard Building Regulations might apply to PD schemes in future, as these had just been adopted through the new local plan.

There was, however, apparently a joined-up approach to enforcement in Enfield (bringing together Planning, Building Control and Environmental Health) which had been taken in relation to some schemes. Similarly, in Sandwell there was a discussion about the authority's Housing Act enforcement powers (albeit these could only be utilised once a conversion had actually been implemented).

In most authorities, planners did not feel any one particular developer stood out in relation to PD schemes. The PD route was often reported to be used by SME developers.

Overall, the LPA perceptions of PD were that it usually led to schemes which were of lower quality than planning permission and that the authority's hands 'were tied' in relation to many of the design,

location and residential amenity issues they would like to consider even if they were supportive of the principle of change of use. It was felt that the principles of sustainability and place-making can be undermined by PDR, with even smaller schemes able to have a cumulative impact on a locale. There were also concerns about the resourcing implications and growing complexity of the PA system.

Assessing quality: site visit and desk based data

The overview of data from all 11 case studies is helpful in considering differences between the different categories of change of use, both in terms of the route (PD or FPA) but also the type of scheme (office, retail / sui generis or storage / light industrial to residential). Table 11, below, shows the results of the 639 (417 PD and 222 FPA) site visits across all our case studies. This shows that conversion rates are slightly higher for planning permission schemes in general (71.6%) than prior approval schemes (63.8%). Prior approval schemes were slightly more likely to involve consent to convert occupied business premises than planning permission schemes (22.3% of prior approval schemes visited were fully or partially occupied in business use at the time of our visit, compared to 17.2% of planning permission schemes).

Planning permission conversions were more likely to involve converting what had originally been a house back into a residential dwelling. It is likely a number of these would be listed buildings (for example, historic residential properties in town and city centres put into office use in the twentieth century and now returning to residential use). This type of conversion long predates PDR for change of use to residential and tends to make higher quality residential units.

Rates of making exterior alterations, such as new windows, doors, balconies and cladding, are broadly similar between planning permission and PD schemes. In both categories, changes to doors, windows and cladding are most common on storage / light industrial to residential units and least likely on office-to-residential conversions. This reflects the amount of change necessary to make such buildings look and feel residential, but also to some extent what is possible under the permitted development rights.

In terms of noticeable additional amenities, such as provision of parking and open space and facilities for refuse and post, there is no obvious difference between planning permission and PD consented schemes overall. Within both, however, storage / light industrial-to-residential were most likely to have car parking and private space, but this reflects the fact that, far from just being buildings in the middle of industrial estates, many of these conversions were actually former agricultural buildings in rural settings, or former mews types buildings and structures in primarily residential areas.

In terms of location, we have data both from our site visits to all buildings here and from our desk based analysis of a smaller (but still significant) number of schemes. This shows that, in relation to access to services, transport and green space, and in terms of general level of deprivation within a neighbourhood, there is overall little difference between PD and planning permission schemes. The researcher impression from site visit is useful here as this can take account of smaller shops and services other than the supermarkets tested through the GIS analysis and for the frequency of public transport compared to the GIS analysis. Through both approaches, similar results emerge for access to services and public transport between PD and FPA schemes overall. For green space, the impression of researchers on site visits was that a higher percentage of planning permission than PD schemes had good access to public green space but this depends on what they observed when approaching a building, whereas the more objective GIS measure finds very similar neighbourhood access to green space scores for both PD and planning permission schemes overall. Access to green space is well recognised to be important for wellbeing, particularly if a residential scheme does not include its own private outdoor space.

Table 11: Overview of site visit data from all 11 case studies

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	324	68	25	**417**	90	113	19	**222**
Current state:								
Conversion not started - vacant business premises	8.0%	11.8%	4.0%	**8.4%**	3.3%	7.1%	0.0%	**5.0%**
Conversion not started - partially occupied business premises	9.0%	2.9%	12.0%	**8.2%**	8.9%	8.0%	10.5%	**8.6%**
Conversion not started - fully occupied business premises	13.9%	17.6%	8.0%	**14.1%**	6.7%	9.7%	10.5%	**8.6%**
Conversion in progress	10.8%	10.3%	32.0%	**12.0%**	7.8%	8.8%	5.3%	**8.1%**
Conversion completed - vacant residential unit(s)	5.6%	5.9%	0.0%	**5.3%**	12.2%	9.7%	0.0%	**9.9%**
Conversion completed - occupied residential unit(s)	46.9%	47.1%	40.0%	**46.5%**	55.6%	52.2%	52.6%	**53.6%**
Unclear	5.9%	4.4%	4.0%	**5.5%**	5.6%	4.4%	21.1%	**6.3%**
Converted (total)	63.3%	63.2%	72.0%	**63.8%**	75.6%	70.8%	57.9%	**71.6%**
Building original use:								
Residential single dwelling	31.2%	61.8%	28.0%	**36.0%**	53.3%	46.0%	31.6%	**47.7%**
Residential apartment building	3.7%	1.5%	0.0%	**3.1%**	5.6%	0.9%	0.0%	**2.7%**
Office building pre-WWII	5.9%	1.5%	0.0%	**4.8%**	6.7%	2.7%	0.0%	**4.1%**
Office building 1950s-70s	10.8%	1.5%	0.0%	**8.6%**	6.7%	0.9%	0.0%	**3.2%**
Office building 1980s-present	16.7%	0.0%	0.0%	**12.9%**	6.7%	0.9%	0.0%	**3.2%**
Warehouse or light industrial building pre-WWII	2.8%	0.0%	16.0%	**3.1%**	2.2%	0.9%	21.1%	**3.2%**
Warehouse or light industrial building post-WWII	7.1%	2.9%	48.0%	**8.9%**	0.0%	0.9%	26.3%	**2.7%**
Light industrial ground floor / residential above	0.0%	0.0%	0.0%	**0.0%**	0.0%	0.0%	10.5%	**0.9%**
Retail building pre-WWII	2.5%	1.5%	0.0%	**2.2%**	5.6%	6.2%	5.3%	**5.9%**
Retail building post-WWII	2.5%	2.9%	0.0%	**2.4%**	1.1%	0.9%	0.0%	**0.9%**
Retail ground floor / residential above	16.4%	26.5%	4.0%	**17.3%**	11.1%	38.9%	5.3%	**24.8%**
Unclear	0.6%	0.0%	4.0%	**0.7%**	1.1%	0.9%		**0.9%**
Average building height (number of floors)	3.0	2.0	1.0	**2.6**	3.0	2.0	1.0	**2.7**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
Number of schemes 1-2 units	35.6%	74.4%	66.7%	**44.0%**	39.7%	65.0%	81.8%	**55.3%**
Number of schemes 3-9 units	21.5%	11.6%	11.1%	**19.2%**	25.0%	22.5%	0.0%	**22.0%**
Number of schemes 10-29 units	13.7%	0.0%	0.0%	**10.5%**	8.8%	3.8%	0.0%	**5.7%**
Number of schemes above 30 units	3.9%	0.0%	0.0%	**3.0%**	0.0%	0.0%	0.0%	**0.0%**
Unclear	25.4%	14.0%	22.2%	**23.3%**	26.5%	8.8%	18.2%	**17.0%**
If converted, obvious notable alterations made:								
New windows	56.1%	62.8%	72.2%	**58.3%**	41.2%	73.8%	72.7%	**59.7%**
New doors	42.4%	55.8%	66.7%	**46.2%**	36.8%	56.3%	45.5%	**47.2%**
Balconies added	4.4%	0.0%	0.0%	**3.4%**	4.4%	1.3%	0.0%	**2.5%**
Site landscaping	11.7%	4.7%	11.1%	**10.5%**	14.7%	13.8%	45.5%	**16.4%**
New cladding	22.0%	32.6%	33.3%	**24.4%**	13.2%	36.3%	36.4%	**26.4%**
If converted, obvious additional facilities provided:								
Bicycle parking	2.0%	0.0%	0.0%	**1.5%**	4.4%	1.3%	9.1%	**3.1%**
Car parking	31.2%	14.0%	38.9%	**28.9%**	27.9%	17.5%	36.4%	**23.3%**
Concierge	1.5%	0.0%	0.0%	**1.1%**	2.9%	0.0%	0.0%	**1.3%**
Gym	0.0%	0.0%	0.0%	**0.0%**	0.0%	0.0%	0.0%	**0.0%**
Roof terrace	0.0%	0.0%	0.0%	**0.0%**	1.5%	0.0%	0.0%	**0.6%**
Private open space	11.2%	9.3%	27.8%	**12.0%**	16.2%	13.8%	27.3%	**15.7%**
Public open space	1.0%	0.0%	0.0%	**0.8%**	0.0%	0.0%	0.0%	**0.0%**
Adequate provision made for waste / refuse	65.4%	72.1%	77.8%	**67.3%**	75.0%	63.8%	54.5%	**67.9%**
Adequate provision made for mail deliveries	75.6%	86.0%	77.8%	**77.4%**	69.1%	87.5%	90.9%	**79.9%**
Building location:								
City or town centre mixed use	26.2%	4.4%	0.0%	**21.1%**	40.0%	21.2%	15.8%	**28.4%**
Local high street mixed use	24.1%	39.7%	24.0%	**26.6%**	28.9%	39.8%	10.5%	**32.9%**
Mostly commercial area	4.0%	0.0%	0.0%	**3.1%**	0.0%	0.9%	0.0%	**0.5%**
Mostly industrial area	5.6%	0.0%	8.0%	**4.8%**	1.1%	0.0%	0.0%	**0.5%**
Mostly residential area	39.2%	52.9%	44.0%	**41.7%**	28.9%	38.1%	63.2%	**36.5%**
Isolated rural area	0.0%	0.0%	24.0%	**1.4%**	0.0%	0.0%	10.5%	**0.9%**
Not answered	0.9%	2.9%	0.0%	**1.2%**	1.1%	0.0%	0.0%	**0.5%**
Researchers impression on location:								
Obviously close to local shops and services	82.1%	85.3%	56.0%	**81.1%**	88.9%	83.2%	52.6%	**82.9%**
Obviously accessible by public transport	87.7%	89.7%	56.0%	**86.1%**	92.2%	90.3%	78.9%	**90.1%**
Obviously close to local open or green space	45.7%	44.1%	36.0%	**44.8%**	81.1%	56.6%	42.1%	**65.3%**

Within our locational analysis, however, the accessibility of storage / light industrial-to-residential schemes to services was generally lower than other categories. This was also the category of scheme most represented in the 'isolated rural area' type of location (which was more prevalent in PD than planning permission schemes – particularly related to storage units on farms), which may explain this data, but is unlikely to be a very sustainable location for new residential development.

In terms of the immediate surroundings, although for the majority of our schemes, there was little difference between PD and planning permission (for example the percentages in town centre / local high street / residential areas), notably PD schemes were more likely to be in mainly commercial areas (like a business park) than planning permission schemes (3.1% compared to 0.5%, primarily driven by office-to-residential PD conversions) and in mainly industrial areas (4.8% of PD schemes compared to 0.5% of planning permission schemes, primarily driven by office-to-residential and industrial-to-residential PD schemes). Although the overall number of such schemes is small, they can offer extremely poor locations for residential living, and this matters for those occupying the premises. It was also something LPAs commented on, as to what sites were suitable for housing allocation and allowing a reasonable level of amenity for residents.

Some of these were in functionally separated New Town locations, such as Weardale House in Washington, Sunderland, which was noted on our site visit as being part of a group of offices positioned in an island formed by A roads and feeling very cut off, or Stoner House and Energy House in Crawley, which were located in business parks with little immediate residential amenity. However, we also saw a number of examples of prior approvals of office buildings in small business parks in the more rural authority areas of Huntingdonshire and Waverley.

In terms of mainly industrial locations, the ones we found on our site visits tended to be associated with PD schemes in major urban areas such as Bristol, Enfield and Manchester, for example Ferodo House, Bristol, which is a former storage building in the middle of an industrial area and 33 Baynton Road, also in Bristol, was surrounded by still occupied light industrial units, making seemingly poor locations for residential use. There were also some more everyday locational issues noted during site visits to a small number of PD schemes, such as an apparent lack of safe walking routes to access Crown House, located on a very busy road in Haslemere, Waverley.

Across our 11 case studies, we conducted a detailed desk-based analysis to explore the quality of 240 converted buildings, which created 3,156 residential units. This comprised 138 schemes whereby the implemented consent for the change of use was via a prior approval (2,818 units) and 102 where it was a full planning permission (338 units). Across both routes, 136 schemes (and 2,868 units) were office-to-residential conversions, 80 schemes (and 218 units) were retail / sui generis-to-residential conversions and 24 schemes (70 units) were storage / light-industrial-to-residential. Table 12, below, illustrates our findings.

Whilst a majority of both prior approval and full planning permission schemes have a fairly straightforward consent for their change of use, a significant minority of both have a more complex consenting history, particularly on the prior approval side. 29.7% of the PD schemes considered had both at least one prior approval and at least one planning application relating to change of use and 9.8% of the FPA schemes considered. This might be because different parts of the building were in different uses prior to conversion, because consent through one route has been refused, or because schemes have been revised before consent. For example, Prospect House in Farnham, Waverley, had a prior approval first and this was used as a fall-back option and negating tool in a subsequent planning application for change of use, extensions and alterations.

Overall, our desk-based analysis found that 32.6% of prior approvals had an associated planning permission, being more common in office-to-residential and storage / light industrial-to-residential schemes than retail / sui generis-to-residential. These are distinct from the schemes we classify as having both a prior approval and planning permission for change of use because in these schemes, consent for the change of use has been achieved through the prior approval only. The planning permission does not relate to change of use, but just to development beyond the scope of PD (for example, external alterations such as changing cladding, adding balconies, extensive new

fenestration on an office-to-residential conversion or landscaping works). LPAs tend to welcome such applications, since they lead to higher quality developments than might otherwise be delivered.

Table 12: Desk based analysis across all 11 case studies

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	**92**	33	13	**138**	44	47	11	**102**
Permission for change of use:								
Prior approval - one only	58.7%	57.6%	53.8%	**58.0%**	0.0%	0.0%	0.0%	**0.0%**
Prior approval - multiple	12.0%	18.2%	0.0%	**12.3%**	0.0%	0.0%	0.0%	**0.0%**
Planning permission - one only	N/A	N/A	N/A	**N/A**	65.9%	63.8%	63.6%	**64.7%**
Planning permission - multiple	N/A	N/A	N/A	**N/A**	29.5%	21.3%	27.3%	**25.5%**
Both prior approval and planning permission	29.3%	24.2%	46.2%	**29.7%**	4.5%	14.9%	9.1%	**9.8%**
Prior approval with associated planning permission	40.2%	6.1%	46.2%	**32.6%**	N/A	N/A	N/A	**N/A**
Number of units created	2677	108	33	**2818**	191	110	37	**338**
Average number of units per scheme	29.1	3.3	2.5	**20.4**	4.3	2.3	3.4	**3.3**
Unit sizes:								
Studio flats	42.8%	5.6%	36.4%	**41.3%**	12.6%	8.2%	18.9%	**11.8%**
One bedroom flats	26.4%	52.8%	42.4%	**27.6%**	31.4%	38.2%	18.9%	**32.2%**
Studios and one bedroom flats	69.2%	58.3%	78.8%	**68.9%**	3.0%	46.4%	37.8%	**44.1%**
Two bedroom flats	29.5%	32.4%	15.2%	**29.4%**	45.0%	30.0%	40.5%	**39.6%**
Three or more bedroom flats	0.5%	3.7%	0.0%	**0.6%**	3.7%	9.1%	5.4%	**5.6%**
Maisonette or house	0.8%	5.6%	6.1%	**1.0%**	7.3%	14.5%	16.2%	**10.7%**
Units complying with national space standards	20.0%	61.1%	63.6%	**22.1%**	73.8%	74.5%	67.6%	**73.4%**
Units with access to private amenity space	2.5%	16.7%	48.5%	**3.5%**	11.5%	36.4%	43.2%	**23.1%**
Buildings with access to communal amenity space	18.5%	12.1%	7.7%	**15.9%**	27.3%	14.9%	45.5%	**23.5%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0.4%	0.0%	0.0%	**0.4%**	0.0%	0.0%	0.0%	**0.0%**
Only skylights or rooflights	0.4%	0.0%	0.0%	**0.4%**	5.0%	0.9%	2.6%	**3.4%**
Only facing an atrium	3.1%	2.8%	3.0%	**3.1%**	4.0%	5.3%	15.8%	**5.7%**
Single aspect	73.2%	51.9%	42.4%	**72.0%**	27.7%	27.4%	44.7%	**29.5%**
Single aspect / north facing only	13.0%	1.9%	15.2%	**12.6%**	7.9%	2.7%	10.5%	**6.5%**
Dual or triple aspect windows	26.0%	48.1%	57.6%	**27.3%**	67.3%	71.7%	52.6%	**67.1%**
EPC rating:								
A	0.0%	0.0%	0.0%	**0.0%**	0.0%	0.0%	18.2%	**2.0%**
B	3.3%	0.0%	0.0%	**2.2%**	9.1%	8.5%	9.1%	**8.8%**
C	30.4%	27.3%	23.1%	**29.0%**	15.9%	19.1%	9.1%	**16.7%**
D	30.4%	21.2%	23.1%	**27.5%**	20.5%	29.8%	9.1%	**23.5%**
E	10.9%	21.2%	0.0%	**12.3%**	13.6%	10.6%	9.1%	**11.8%**
F	1.1%	6.1%	15.4%	**3.6%**	2.3%	0.0%	0.0%	**1.0%**
G	1.1%	0.0%	0.0%	**0.7%**	0.0%	4.3%	0.0%	**2.0%**
Could not tell	22.8%	24.2%	38.5%	**24.6%**	38.6%	27.7%	45.5%	**34.3%**
Council tax:								
A	30.4%	30.3%	0.0%	**27.5%**	25.0%	44.7%	27.3%	**34.3%**
B	23.9%	21.2%	7.7%	**21.7%**	18.2%	10.6%	0.0%	**12.7%**
C	12.0%	24.2%	7.7%	**14.5%**	15.9%	6.4%	0.0%	**9.8%**
D	6.5%	6.1%	30.8%	**8.7%**	9.1%	6.4%	9.1%	**7.8%**
E	3.3%	0.0%	0.0%	**2.2%**	6.8%	6.4%	9.1%	**6.9%**
F	3.3%	0.0%	7.7%	**2.9%**	0.0%	0.0%	18.2%	**2.0%**
G	0.0%	0.0%	7.7%	**0.7%**	0.0%	0.0%	0.0%	**0.0%**
H	1.1%	0.0%	0.0%	**0.7%**	4.5%	0.0%	0.0%	**2.0%**
Could not tell	19.6%	18.2%	38.5%	**21.0%**	20.5%	25.5%	36.4%	**24.5%**
GIS Analysis:								
Average Index Multiple deprivation	4.46	4.24	6.74	**4.62**	3.84	4.16	4.08	**4.01**
Average Access to Public Green Space score	4.20	3.16	5.12	**4.04**	3.83	4.02	4.50	**3.99**
Walking distance to small supermarket	84.8%	72.7%	69.2%	**80.4%**	84.1%	87.2%	63.6%	**83.3%**
Walking distance to large supermarket	75.0%	54.5%	69.2%	**69.6%**	65.9%	76.6%	36.4%	**67.6%**
Walking distance to a bus stop	60.9%	69.7%	53.8%	**62.3%**	54.5%	61.7%	45.5%	**56.9%**
Walking distance to a rail station	73.9%	51.5%	61.5%	**67.4%**	61.4%	59.6%	27.3%	**56.9%**

The prevalence of the associated permissions for office-to-residential PD schemes compared to retail-to-residential is likely to be because many of these are larger scale schemes (average of 29.1

compared to 3.5 units) and so applicants will be keen to avoid the FPA route for change of use if at all possible, so as to avoid Section 106 / affordable housing contributions. In other words, many office conversion schemes are large enough to potentially trigger such contributions if consented under a planning permission and so the favoured approach will be a PA for the change of use even if there is then an associated planning permission for external works. For retail-to-residential, the small size of schemes means that the majority are below the contribution thresholds in most LPAs, and so where a scheme might require associated works beyond the score of a PA, the developer may be more likely just to go with a FPA to begin with. That said, the nature and scale of most retail units means they are more able to be converted without needing extensive external alterations, in contrast to storage / light-industrial to residential.

Prior approval schemes are much more likely to be studio or one-bedroom units than planning permission schemes (68.9% of units created under PD compared to 44.1% under FPA). Studio and one-bed units cannot be considered family housing, although this represents an important category of unmet housing need in many places. Studio flats, in particular, are much more prevalent under PD (41.3% of schemes compared to 11.8% of FPA schemes), driven by office-to-residential primarily but also common with storage / light-industrial-to-residential conversions. Such high concentrations of small units (in terms of the number of bedrooms) does not work to create mixed communities and, given the profile of housing demand in most locations, can lead to residential overcrowding.

There was a dramatic difference in terms of the percentage of units complying with the suggested national described space standard: just 22.1% of the units created under PD met this standard, compared with 73.4% of the planning permission units. Within this, office-to-residential PD had by far the lowest compliance. Further, where units were smaller than the space standards, permitted development units were often much smaller (15m^2-20m^2 studios were not uncommon) whereas planning permission units were often only slightly smaller (for example, some conversions in Waverley at 33m^2 which actually complied with the then local supplementary planning guidance suggested space standards).

Looking in more detail at space standard compliance, within PD schemes it was not just studio flats missing this target, but also many one and two bedroom units (indeed 77.8% of units created under PD are smaller than suggested national space standards, but only 41.3% of PD units are studio flats, demonstrating that there are numerous one- and two-bedroom flats which are also smaller than the standard). Where PD schemes are creating flats, a majority of all types appear to be smaller than NDSS. However, given the distribution of unit types (with studio flats much more common in PD than FPA schemes, as Table 12 shows), studio flats do represent the largest category of PD unit types missing space standards. It is in these units that, arguably, very small space standards can have the most significant overall impact by having such a small quantum of internal living area available to whoever is occupying them. There was also no evidence of compliance with the suggested NDSS having improved over time for PD units (within the three year period examined through this research).

An analysis was also conducted comparing the smallest units in each scheme. This led to a mean average 'smallest' unit in PD schemes of 53.7m^2 compared to 98.3m^2 in FPA schemes. This ignores the number of bedrooms / type of scheme, however provides a sense of a typical size of a scheme under each route. Table 13, below, has the data for each individual case study LPA, however it should be noted that the number of FPA schemes examined in some authorities was small, and therefore the results are more robust for this category when considered across all eleven case studies.

In terms of the smallest unit seen per authority, under PD these were all studio flats, and as Table 13, shows, although the very smallest – 10m^2 – was in one scheme in Derby, other schemes with units of 14-17m^2 were found across another six LPAs. In comparing to the smallest FPA unit found, a 14m^2 unit found in Sunderland was actually for a 'student pod'. The planning application was described as for a conversion to C3 residential use, however the officer report then noted that it was going to be explicitly used as student accommodation and it complied with the local guidance on such accommodation, which is usually considered a sui generis use. The next smallest unit found in an FPA scheme in Sunderland was 26m^2 and the smallest across all case studies would then be the

21m^2 unit found in a scheme in Derby. In both of these cases, the officer report did not discuss space standards explicitly (and indeed the Sunderland office report was using an old, outdated UDP as its plan policy basis). The Derby unit was in a Grade II listed building, where there may have been limitations on changes which could be made to the historic structure to accommodate a larger unit. No officer report was publicly available in relation to the small one bed flat found in Wakefield.

Elsewhere, the space standards of the smallest FPA units in Bristol, Crawley and Waverley were all things which had been discussed explicitly in officer reports (in Bristol, it was felt to be – on balance – acceptable given other material considerations; in Crawley it complied with the then local Supplementary Planning Guidance (SPG); and in Waverley it was a scheme initially refused planning permission but allowed on appeal). In Sandwell, the smallest unit created through the FPA route had actually originally been proposed as a one bed flat, but the officer report notes that concerns were raised about the space standards and the applicant revised the scheme to make this a studio unit instead.

Table 13: Smallest units found and average unit size through both consenting routes

	Smallest PD unit size m^2 and type of unit	**Average PD unit size m^2**	**Smallest FPA unit size m^2 and type of unit**	**Average FPA unit size m^2**
Bristol	21 – Studio flat	46.6	35 – Studio flat	118.0
Crawley	16 – Studio flat	28.5	33 – Studio flat	60.7
Derby	10 – Studio flat	44.4	21 – Studio flat	97.2
Enfield	27 – Studio flat	62.1	38 – Studio flat	58.3
Huntingdonshire	25 – Studio flat	68.2	155 – 4 bed house	200
Manchester	14 – Studio flat	80.6	45.6 – 2 bed flat	103.6
Richmond	27 – Studio flat	73.0	37 – Studio flat	87.8
Sandwell	17 – Studio flat	39.8	40.3 – Studio flat	74.9
Sunderland	14 – Studio flat	30.6	26 – Studio flat *(also found a 14m^2 student room)*	55.6
Wakefield	15 – Studio flat	34.9	36 – 1 bed flat	98.6
Waverley	16 – Studio flat	46.1	31 – Studio flat	121.5
All 11 case studies	**10**	**53.7**	**21**	**98.3**

Table 13 just considers the extreme of the smallest unit seen in each LPA under each consenting route, however, and the vast majority of planning permission units complied with space standards or only narrowly missed them whereas the vast majority of PD units missed space standards and often missed by some way. Compliance with space standards is worth discussing at length as it is an important consideration of residential quality, which can have important impacts on people's health, wellbeing and family life, as discussed in a range of research, including that overviewed by Carmona et al. in 2010.[36] Given the lack of control over who occupies most homes, smaller unit space standards can lead to an enhanced risk for overcrowding to occur in areas of high housing need. Smaller sized units are also less adaptable in the longer term.

The potentially poor residential experience in very small sized units could be exacerbated by the fact that so few had access to amenity space: just 3.5% of PD units had access to private amenity space (lowest for office-to-residential conversions) and just 15.9% had access to communal amenity space. That said, the planning permission rates of amenity space access are not particularly high either (23.2% of units with access to private amenity space, 23.3% communal), but many of the planning permission conversions considered were small conversions of just a few units where such provision

[36] 'Space standards: the benefits' at https://webarchive.nationalarchives.gov.uk/20110118111541/http://www.cabe.org.uk/files/space-standards-the-benefits.pdf

would less commonly be expected. Access to amenity space (such as private outdoor space) is increasingly recognised as a feature of good residential design.[37]

The access to daylight in units would also be better, on average, for planning permission units than permitted development units. 72.0% of PD units only had single aspect windows, and 12.6% only had single aspect windows facing north. Office-to-residential conversions were most likely to have single aspect windows. This compares to 29.5% of planning permission units only having single aspect windows, and 6.5% of those units having single aspect windows facing north. Looking at the 377 units identified as single aspect and facing north only through our desk research (355 from PD and 22 from FPA), overall 62.1% appeared to be studio flats and 28.4% one bed flats with this window arrangement.

Comparing the two routes, of the PD units which were single aspect and north facing, 63.3% were studio flats, 27.3% were one-bed flats and 9.3% were two-bed flats. For the FPA units in this category, 54.5% were studio flats, 31.8% were one-bed flats and 13.6% were two-bed flats (albeit this is out of a much smaller total of 22 such units found). Looking at the two FPA schemes creating two-bed flats with only single aspect windows, one was a conversion of a Grade I listed building in Bristol, where the officer report notes the generous internal space standards as a positive factor supporting better residential amenity. The other was a Grade II listed building in Derby, where the decision letter notes that overall (balancing all elements of design considered), the planners feel that acceptable levels of residential amenity would be provided in the new flats.

Looking at our overall figures for window arrangement across all schemes examined, 67.1% of planning permission units were dual (or even sometimes triple) aspect compared to 27.3% of PD units. In some cases, PD schemes had layouts which would reduce access to natural light, for example, 'dog-leg' shaped apartments and contrived layouts to enable the unit to have a window, which might not then be adjacent to the main living area (which seem to be a result of attempts to maximise the number of units in certain schemes beyond what can be achieved without having such compromised layouts). It is worth mentioning that 3.5% of planning permission units actually only had light from skylights or rooflights (compared to 0.4% of prior approval units), however in general this had been discussed in planning officer reports and found, on balance, acceptable (often linking to converting historic listed building attic spaces).

Although units with no windows at all were fairly rare in terms of the overall number of units, they did exist under PD (only) and we found ten such units (all in office-to-residential conversions: nine units in three schemes in Crawley and one unit in a scheme in Manchester). These were all studio units included in multi-unit conversions. Given we have only considered a sample of schemes in 11 case studies in England, even these small numbers found must be of serious concern. Access to sufficient natural light and sunlight has long been linked to health and its lack can very likely impact the wellbeing of residents.[38]

In terms of EPC performance, there is a somewhat similar bunching around grades C and D for both planning permission and permitted development schemes. No PD conversions at all achieved grade A (best performance), but 2.0% of planning permission schemes did achieve this. Similarly, 8.8% of planning permission units achieved grade B, compared to 2.2% of permitted development units. However, 2.0% of planning permission units achieved grade G (the worst performance) compared to 0.7% of PD units. There were a significant number of units in both categories where information was not available on energy performance, however. Figure 1 illustrates the distribution of EPC scores across both PD and FPA schemes.

[37] For example, in London's 2016 'Housing Supplementary Planning Guidance' at https://www.london.gov.uk/sites/default/files/housing_spg_revised.pdf

[38] In 1968, the Goromosov argued that 'daylight gives a feeling of direct contact with the outside world; this emotional factor is of particular importance for living premises': see 'The physiological basis of health standards for dwellings' at https://apps.who.int/iris/bitstream/handle/10665/39749/WHO_PHP_33.pdf, page 59 or for more recent research, see Swanson et al 2016, 'Indoor Annual Sunlight Opportunity in Domestic Dwellings May Predict Well-Being in Urban Residents in Scotland' at https://doi.org/10.1089/eco.2015.0059

A similarly slightly mixed picture is presented by comparing the Council Tax banding of units created through permitted development with those created through planning permission. Although there is a higher percentage of FPA units in Band A, denoting the least valuable properties (34.3% of FPA units compared to 27.3% of PD units), there is a slightly higher percentage of FPA units in the highest bands (E-H) than PD units. There are a significant number of units in both categories where information was not available online on Council Tax banding. Figure 2 illustrates the distribution of Council Tax banding across both PD and FPA schemes.

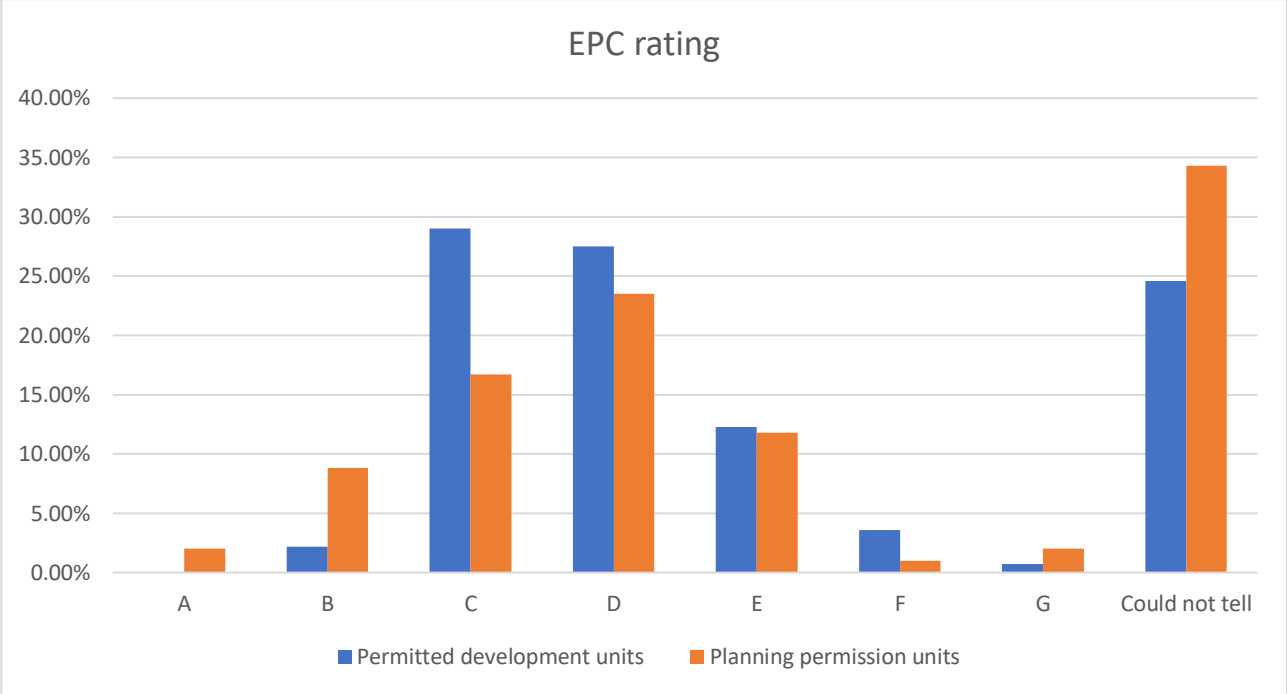

Figure 1: Energy Performance Certificate scores for units created through PD and FPA routes

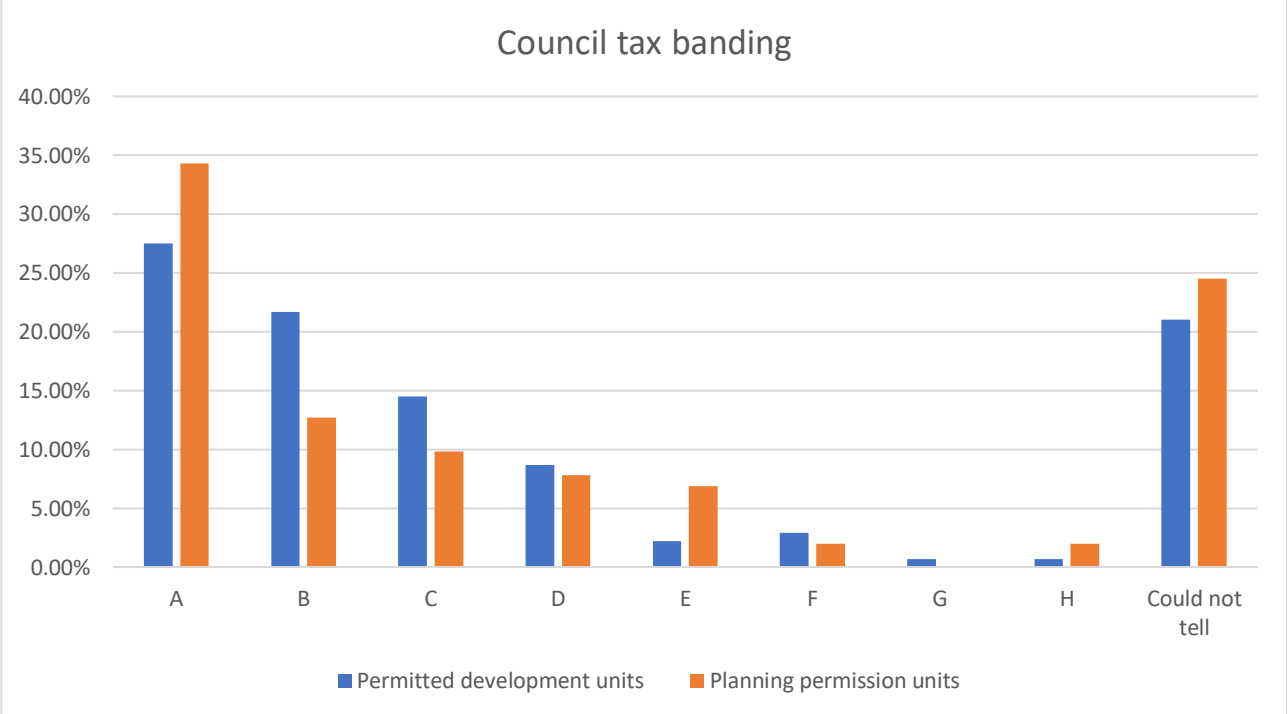

Figure 2: Council Tax banding for units created through PD and FPA routes

The final aspect considered through the desk research was the tenure of housing units. Overall, we found online evidence to suggest that 47.1% of permitted development units had gone to market sale, and 46.1% of planning permission units, with 21.7% of permitted units going to PRS compared to 17.6% of planning permission units. These data are quite similar, however there was no readily available information on tenure for 25.4% of PD units and 31.4% of FPA units, so this picture must be treated with some caution. There was a lack of robust information available publicly in relation to temporary housing use.

The relationship between locality and context

Whilst our discussion here provides a national level comparison of some key residential quality indicators between permitted development and planning permission units created across all 11 of our case studies, it is important to note that there is significant variance within these categories between each LPA considered. Full data on each indicator considered for each LPA case study is available in Appendix 1 – Appendix 11 of this report. A caveat here would be, that on the aggregated level across all our case studies, there are arguably sufficient schemes considered for a fairly robust comparison to be made between different routes and types. For a few of the case studies individually, however, there are quite low scheme numbers considered in relation to the planning permission route so a degree of caution must be exercised. Nevertheless, there does seem to be variation here worth considering.

Table 14, below, indicates the comparison between each case study in relation to the percentage of units meeting national space standards, access to private amenity space (higher rates for both seen as better quality), and the prevalence of single aspect windows (higher rates seen as poorer quality). Figure 3, Figure 4 and Figure 5, then illustrate this data graphically. Taken together, we can see that for national space standards, a higher percentage of units from planning permission than permitted development meet the NDSS in all eleven case studies, but the rate of compliance for both consenting routes varies considerably. For private amenity space, a higher rate of provision is achieved through planning permission than permitted development for 10 of the 11 case studies, whilst for single aspect windows, a lower rate is seen for planning permission than permitted development for 10 of the 11 case studies, but again rates vary considerably between each LPA.

Table 14: Performance against key housing quality indicators by consent route and by LPA

	Units complying with national space standards			**Units with access to private amenity space**			**Units with single aspect windows**		
	PD	FPA	*Difference*	PD	FPA	*Difference*	PD	FPA	*Difference*
Bristol	19%	88%	*69*	1%	21%	*20*	76%	14%	*62*
Crawley	9%	27%	*18*	2%	9%	*7*	75%	82%	*-7*
Derby	3%	32%	*29*	1%	21%	*20*	81%	47%	*34*
Enfield	58%	100%	*42*	24%	67%	*43*	29%	0%	*39*
Huntingdonshire	40%	100%	*60*	6%	50%	*44*	71%	0%	*71*
Manchester	18%	44%	*26*	4%	67%	*63*	83%	78%	*5*
Richmond	67%	94%	*27*	19%	18%	*-1*	52%	10%	*42*
Sandwell	48%	59%	*11*	2%	32%	*30*	72%	9%	*63*
Sunderland	29%	86%	*57*	1%	5%	*4*	66%	55%	*11*
Wakefield	37%	89%	*52*	0%	44%	*44*	51%	11%	*40*
Waverley	52%	78%	*26*	20%	36%	*16*	49%	24%	*25*

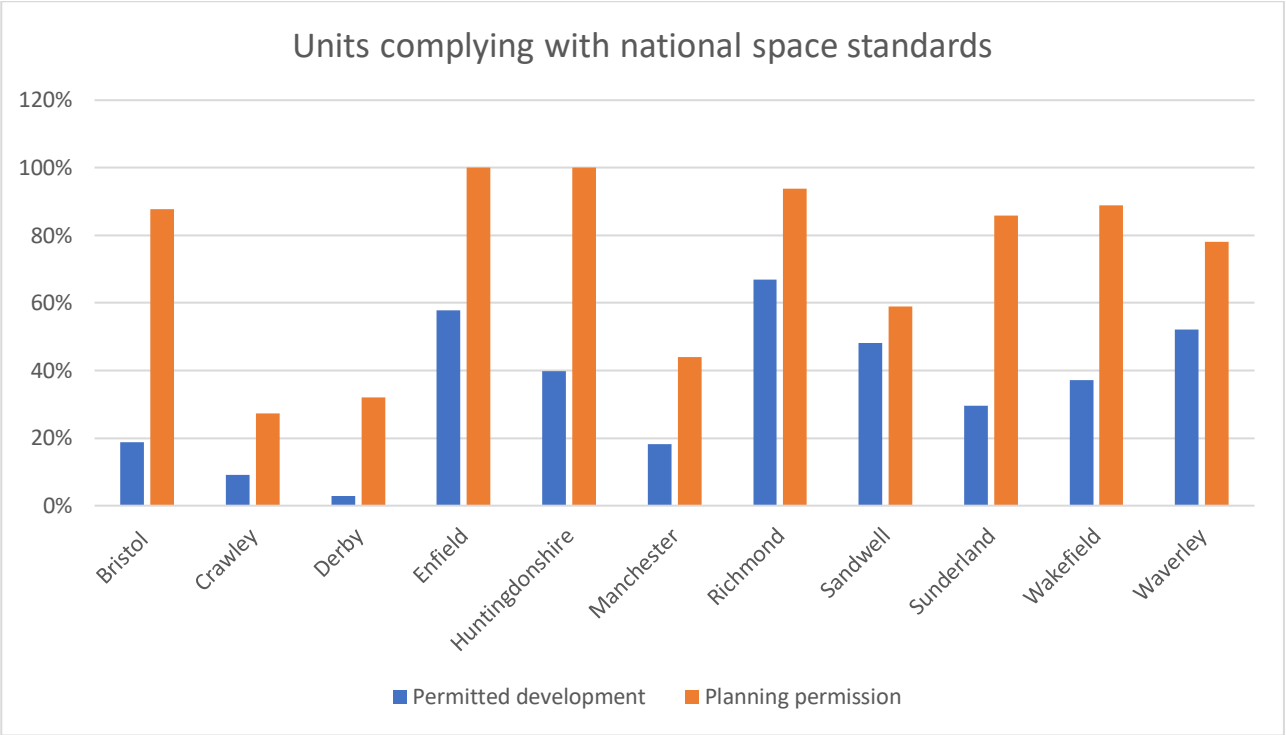

Figure 3: Percentage of units complying with NDSS through PD and FPA consent for each case study LPA

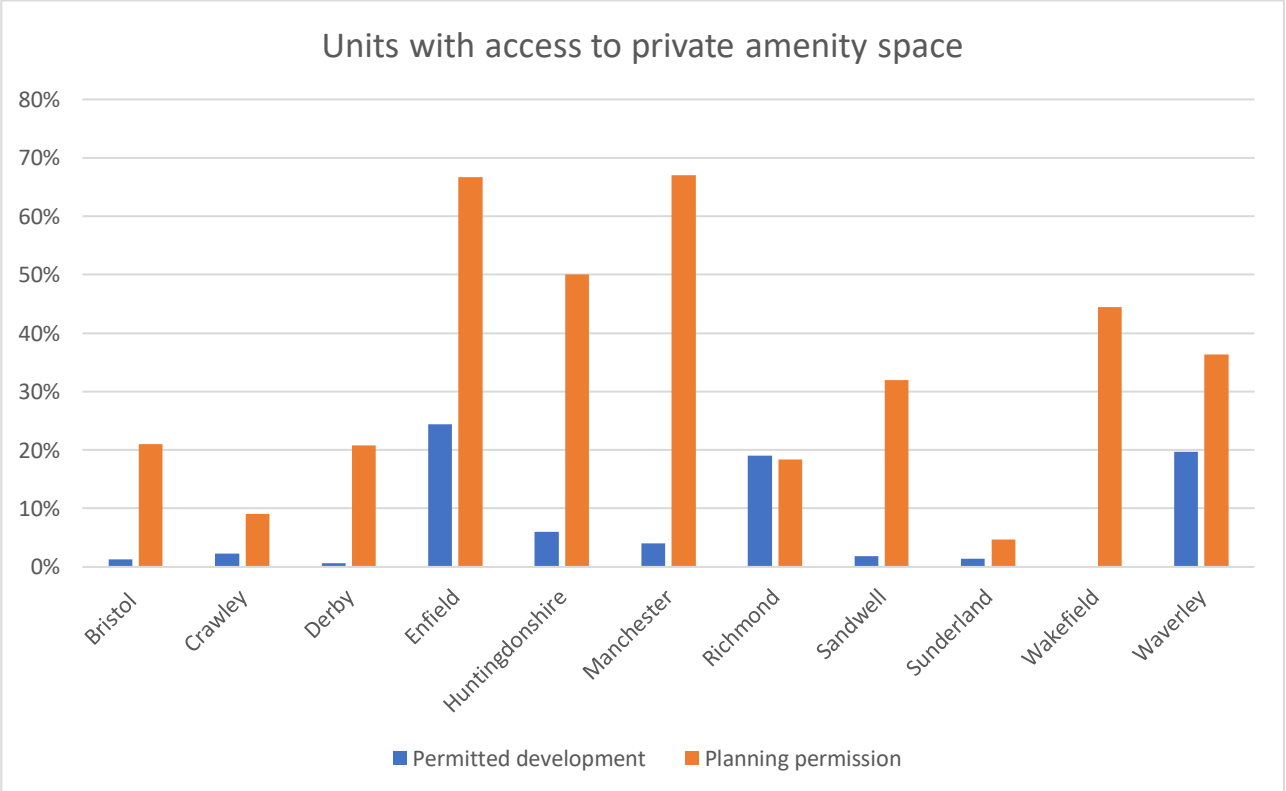

Figure 4: Percentage of units providing private amenity space through PD and FPA consent for each case study LPA

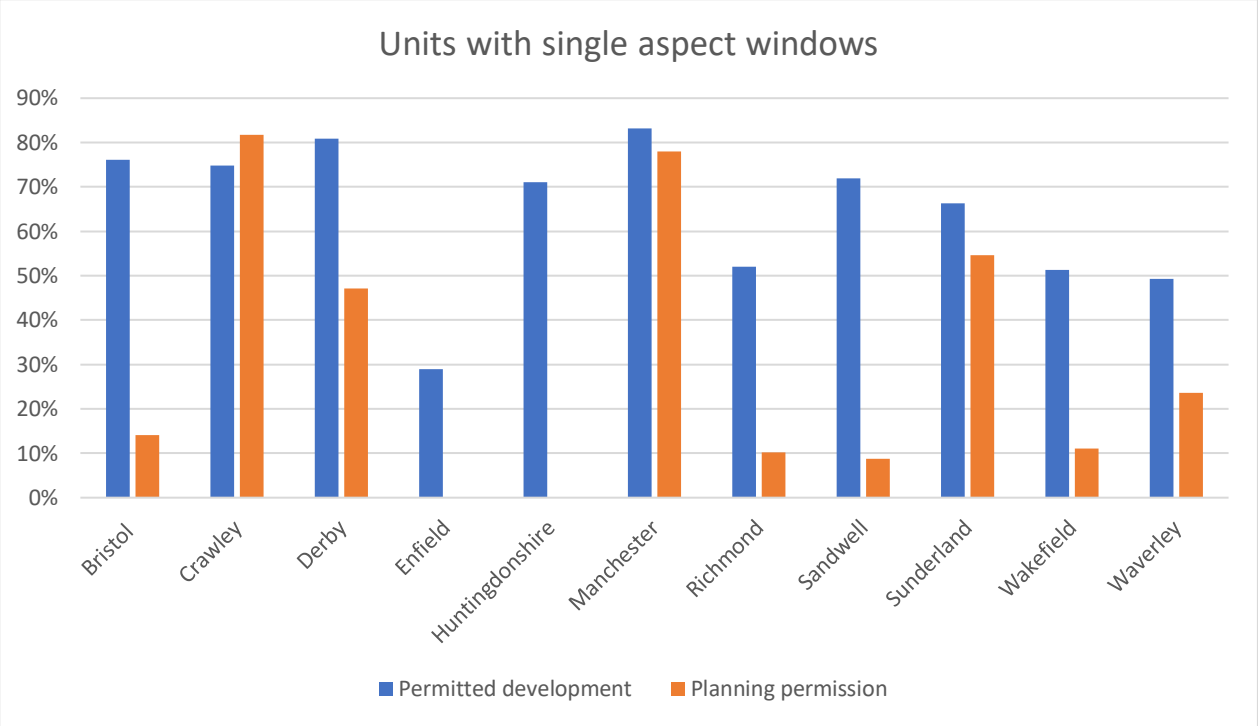

Figure 5: Percentage of units with only single aspect windows through PD and FPA consent for each case study LPA

An obvious question is then to ask what might be driving such locational difference. Beyond differences between the two consenting routes, and the amount of regulatory control possible, one important factor might be the type and scale of buildings being converted. For example, it may be difficult to make some small-scale conversions (1-3 units) of former retail units or offices above retail units anything other than single aspect windows because of the physical constraints of the building. Similarly, a number of the schemes (particularly retail-to-residential) considered in this research are small scale in nature and so unlikely to be ones where a planning authority might particularly push a requirement for private amenity space provision and again there may be physical constraints making its provision challenging.

Compliance with the NDSS is, however, something which might arguably be more readily achievable in theory in every scheme. Compliance with this by PD schemes varies from 3% (Derby) to 67% (Richmond) whilst for FPA schemes it varies from 27% (Crawley) to 100% (Enfield and Huntingdonshire). There does seem to be some correlation in variation between the percentage of units meeting the standard through both routes, i.e. whilst performance is higher for FPA than PD units everywhere, those LPAs achieving highest compliance in terms of percentage of FPA units meeting the standard seems to bear relation to those achieving higher compliance in terms of percentage of PD units meeting the standard.

For the planning permission variation, one important factor is local planning policy. As has already been discussed, a number of FPA units in Crawley and Waverley, for example, were slightly smaller than the NDSS but met sizes suggested locally in supplementary planning guidance. It is also notable that space standards were explicitly discussed in planning officer reports for planning applications being determined in some places (for example, Bristol) but not others (for example, Sunderland). There are, however, complex interactions between local and national standards and between status in Supplementary Planning Guidance (SPG) and Supplementary Planning Document (SPD) versus Development Plan Documents (DPD) policies. The quality / space standard agenda is still emerging in local plan policies, following central government messaging, although these issues seem a greater concern in certain authorities due to local interests and decision-making cultures.

Planning policy cannot explain the difference in performance against space standards for PD units, however. This is largely down to the preferences of the developer. It is therefore interesting to consider what part local social-economic conditions might play here. Taking data from Chapter 4 and comparing it with our desk research, we can compare performance against space standards with the average Index of Multiple Deprivation scores for the neighbourhood locations of schemes in each LPA, the average unemployment rate, and the average house prices in each LPA. Table 15, Figure 6, Figure 7 and Figure 8 illustrate these comparisons.

Table 15: Comparison of compliance with NDSS against selected socio-economic data for each LPA

	Bristol	Crawley	Derby	Enfield	Huntingdonshire	Manchester	Richmond	Sandwell	Sunderland	Wakefield	Waverley
Average IMD	4.06	4.14	2.42	3.98	6.43	2.25	8.95	2.63	1.71	2.3	8.82
% unemployed	3.8%	3.3%	5.0%	5.3%	2.8%	5.4%	3.5%	5.3%	6.9%	4.5%	2.0%
Average house price (£1000s)	£278	£281	£159	£392	£260	£180	£667	£153	£116	£154	£460
PD units meeting space standards	19%	9%	3%	58%	40%	18%	67%	48%	29%	37%	52%
FPA units meeting space standards	88%	27%	32%	100%	100%	50%	94%	59%	86%	89%	78%

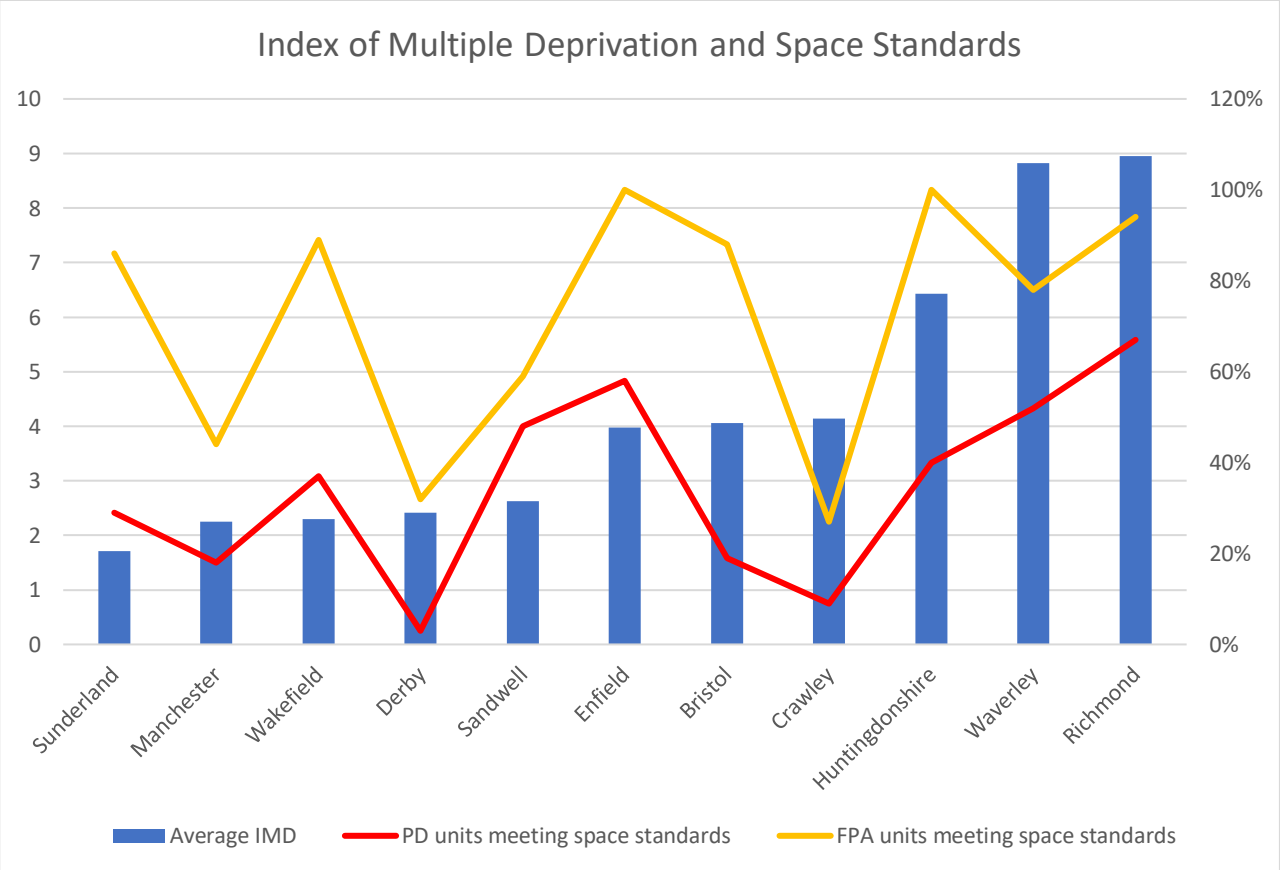

Figure 6: Comparison of percentage of units meeting space standards through both consenting routes with average IMD score for each case study LPA (lower score = higher deprivation)

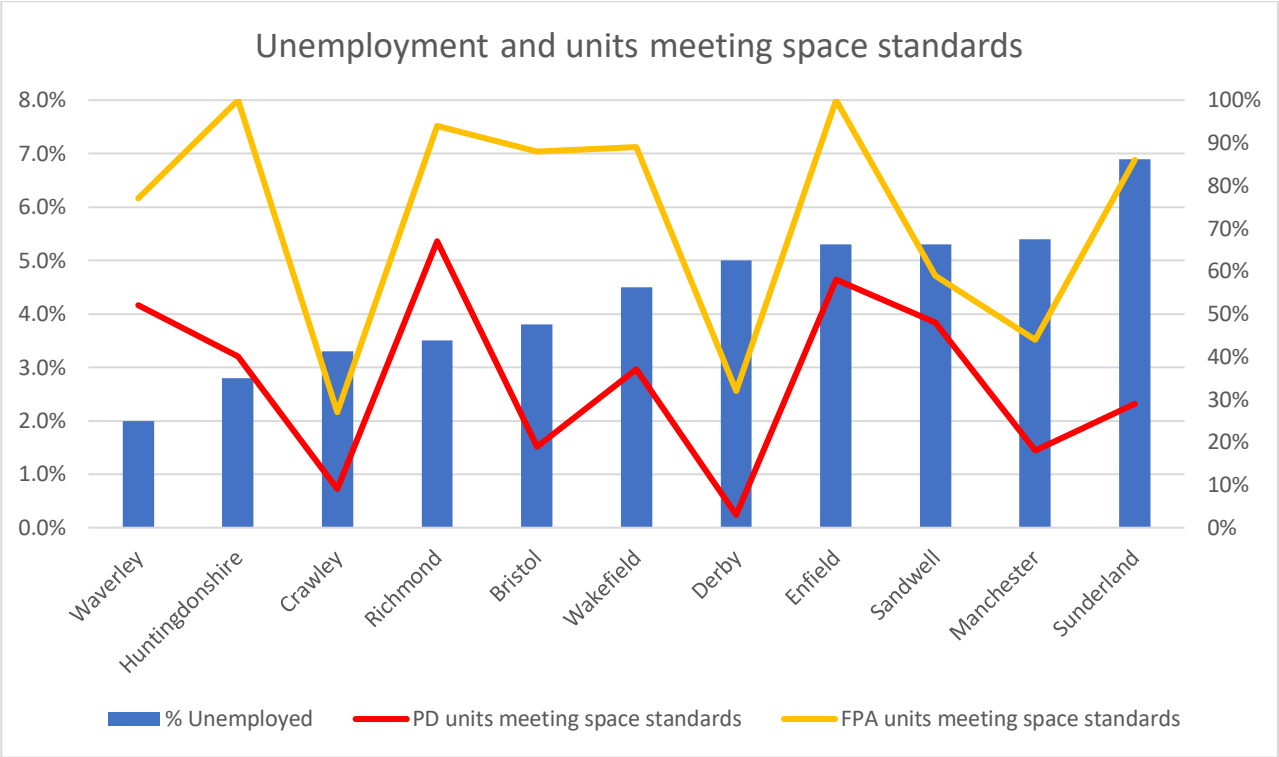

Figure 7: Comparison of percentage of units meeting space standards through both consenting routes with the percentage of unemployment for each case study LPA

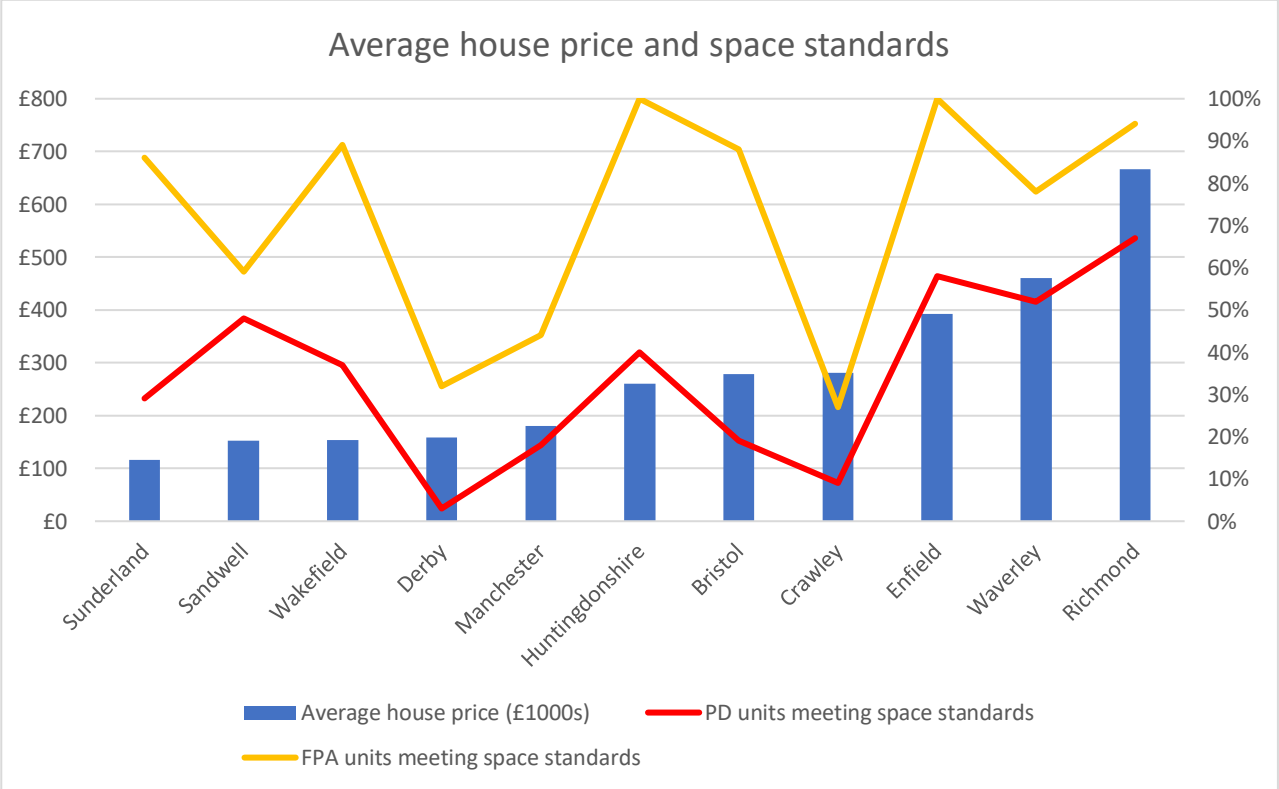

Figure 8: Comparison of percentage of units meeting space standards through both consenting routes with the average house price for each case study LPA

The percentage of unemployed per LPA seems to show only weak correlation with the percentage of units meeting the NDSS via either consenting route. Indeed, the main thing this graph seems to illustrate is the way that the variation in units meeting the standard through the PD route seems to

largely track the variation in units meeting the standard through the FPA route in each LPA. For the average house price and IMD graphs, however, there does seem to be some correlation between the PD units meeting these standards and both these measures. In other words, the more deprived a locality, or the lower its average house prices, the smaller the average space standards under permitted development. This relationship is not, however, the same for space standards under planning permission. This suggests that local planning policy and planner behaviour in considering space standards as part of the decision-making process might be having an influence. It might also be the case that in lower demand markets, it is actually necessary to have a higher quality product to sell units, with planning permission units being more likely to be for market sale than the poorer quality PD units.

A final area of comparison is between space standards and the nature of the local office stock (office-to-residential being responsible for by the far greatest number of units created through PD change of use). Table 16, below, and Figure 9, Figure 10 and Figure 11, show a comparison between the percentage of units created through the PD and FPA routes in each LPA and against various indicators related to the office stock.

The first, average unit size created through all the schemes examined in the desk based analysis is related to the type of office buildings which were available for conversion in that locality, as a stock of larger (often 1960s and 1970s) office blocks will lead to larger average scheme sizes through conversion than a lot of small offices (often one floor above retail unit types). As Figure 9 illustrates, there does seem to be a strong correlation here between scheme size and the percentage of PD units meeting NDSS, and a weaker but still apparent correlation between scheme size and the percentage of FPA units meeting NDSS. Larger schemes seem to have smaller unit sizes, on average, than smaller schemes.

Table 16: Comparison of compliance with NDSS against selected office stock data for each LPA

	Bristol	Crawley	Derby	Enfield	Huntingdonshire	Manchester	Richmond	Sandwell	Sunderland	Wakefield	Waverley
Average PD scheme size (units)	32.3	77.5	34.1	2.2	10.4	28.3	6.1	13.3	36.2	16.1	5.92
Office vacancy rate	3.6%	10.0 %	4.3%	1.7%	1.7%	5.8%	2.9%	1.9%	4.4%	2.3%	2.6%
Office rent (3 star offices per sf)	£19.6	£20.8	£12.7	£23.8	£14.3	£16.3	£33.8	£12.5	£9.8	£11.3	£24.4
PD units meeting space standards	19%	9%	3%	58%	40%	18%	67%	48%	29%	37%	52%
FPA units meeting space standards	88%	27%	32%	100%	100%	50%	94%	59%	86%	89%	78%

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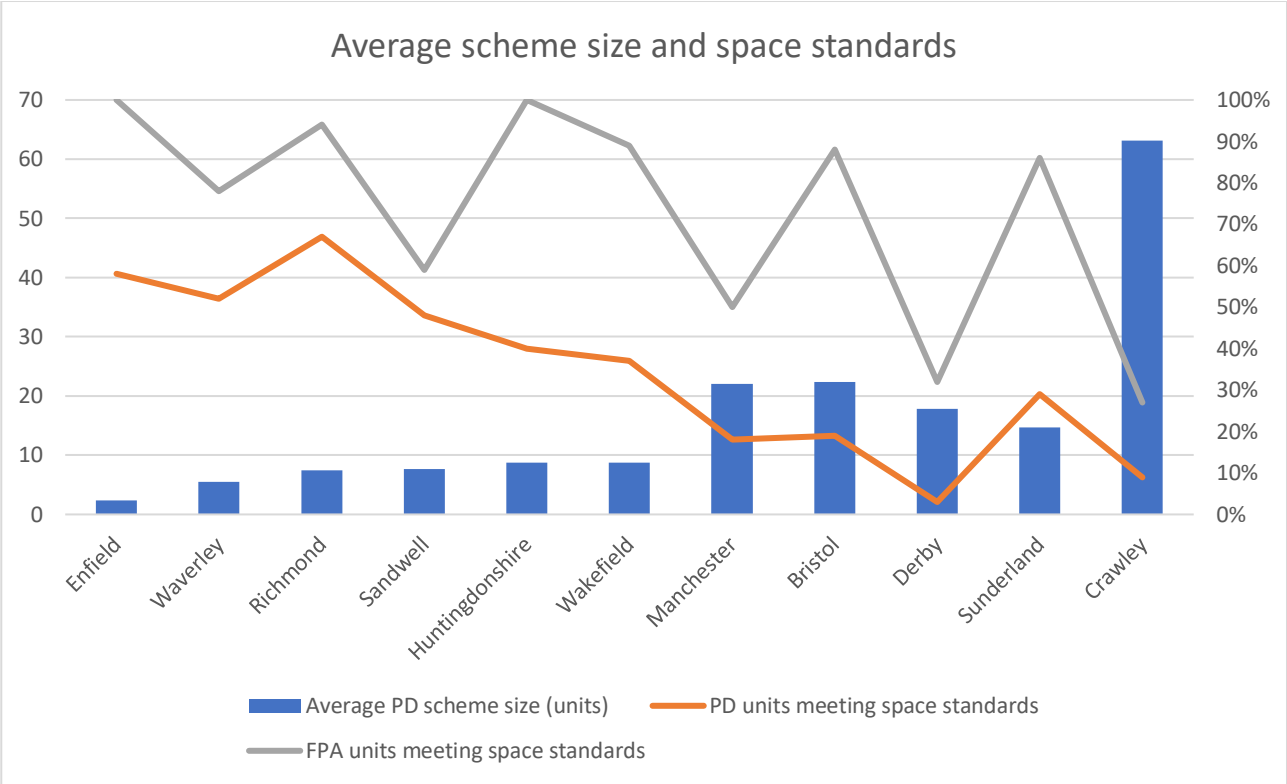

Figure 9: Comparison of percentage of units meeting space standards through both consenting routes with the average number of units per scheme seen in each case study LPA

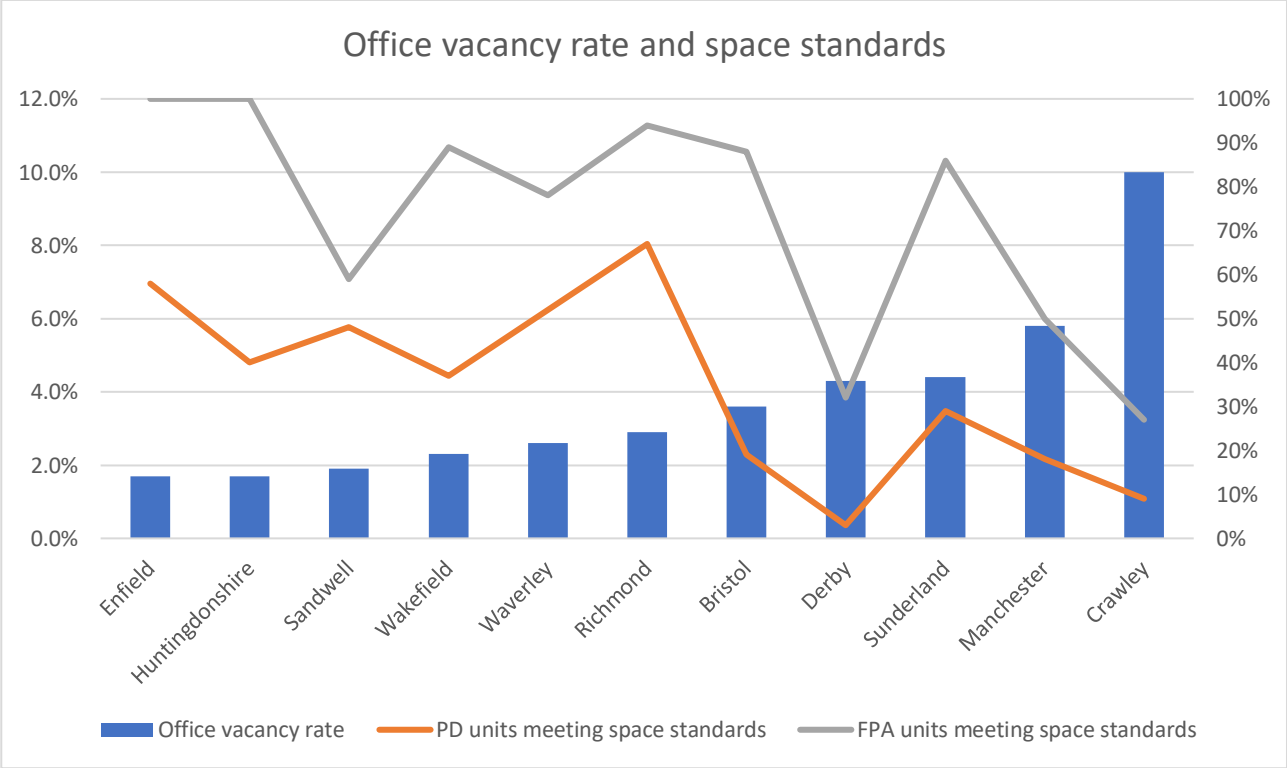

Figure 10: Comparison of percentage of units meeting space standards through both consenting routes with the average office vacancy rate seen in each case study LPA

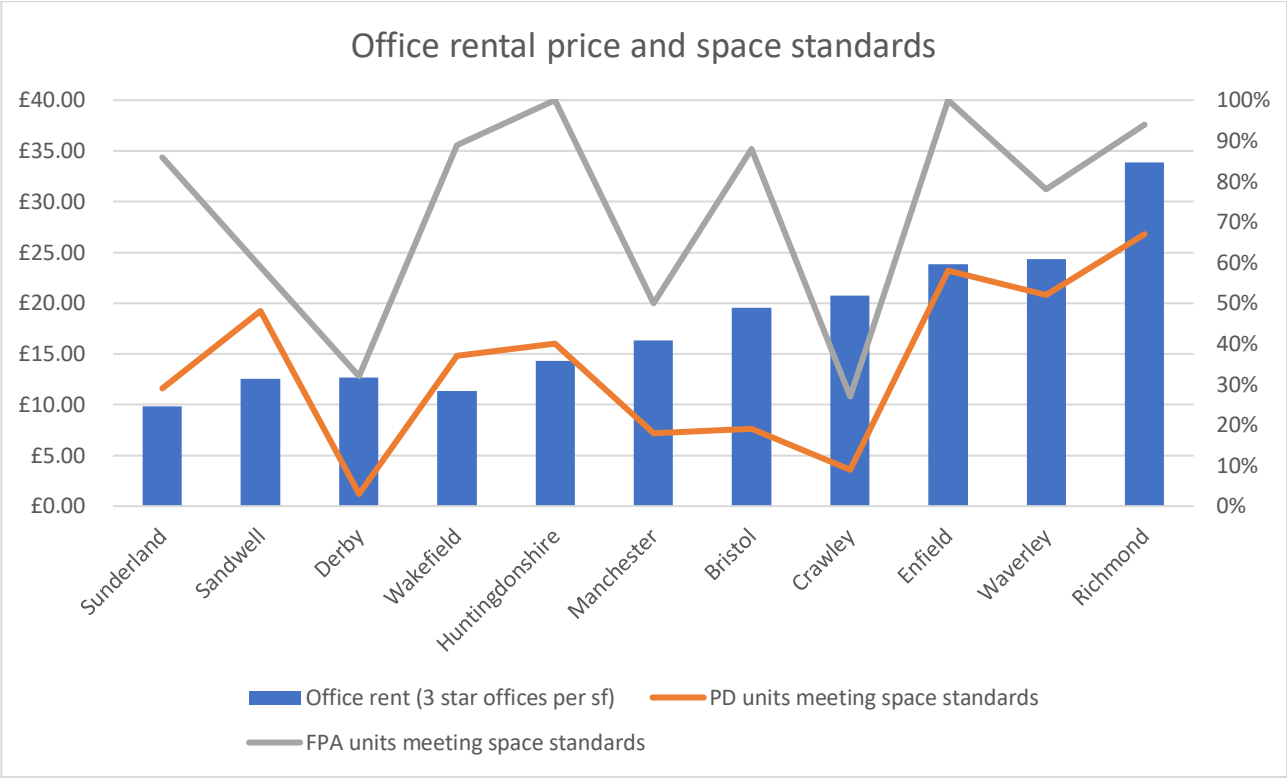

Figure 11: Comparison of percentage of units meeting space standards through both consenting routes with the average office rental price seen in each case study LPA

There does not appear to be such a strong relationship between office vacancy rate and the percentage of PD units meeting space standards as between average scheme size and the percentage of PD units meeting space standards, but some correlation is still apparent in Figure 10. There also appears some correlation between office vacancy rate and the percentage of FPA units meeting space standards, albeit slightly weaker. There is thus some evidence that the higher the office vacancy rate in a locality, the smaller the average unit size from change of use. For office rental prices, Figure 11 shows some possible correlation between average rental price and PD units meeting space standards, suggestive that the higher office rents, the better average space standards but this is weaker than the other measures (and does not so closely map for FPA units). This last indicator may be more closely related to the general economic prosperity of an area, already discussed, as well as the type of office stock prevalent in the local built environment.

In considering variations in housing quality against locality as examined in this research, there does appear to be some relationship whereby lower quality housing is produced in areas where office markets are suffering from a lack of demand and obsolescence. There is an interrelationship between this and levels of deprivation. In some areas where there is less office space, but higher levels of affluence and housing prices, you seem to see higher standard housing being produced through change of use (for example, Richmond). This might be contrasted with lower standards in areas with higher deprivation and reasonable availability of office space for conversion (for example, Derby) or areas with very high availability of redundant office space for conversion (for example, Crawley).

The interactions between local socio-economic conditions, the nature of the office stock and type of office building prevalent in the local environment, planning policy and development management procedures are complex. It does appear, however, that where demand for office and other commercial space is lower, and deprivation higher, there is a higher risk of a location ending-up with a quantum of poorer quality conversions through PDR.

7. Planning gain and permitted development

Introduction

Developer contributions are an important aspect of planning practice in England. Successive Acts of Parliament have established the long-standing principle that there will often be a requirement to accompany real estate development with investment in public goods to make it acceptable and sustainable in planning terms. The Town and Country Planning Act's Development Charge (1947), the Land Commission Act (1967), the Community Land Act (1975), the Development Land Tax Act (1976), the Town and Country Planning Act (1990) and the Planning Act (2008) represent important legal moments in setting and amending the process by which the contributions the development industry makes are exacted and invested.

Permitted development rights are considered by many to lie outside the formal scope of legislation in Section 106 of the Town and Country Planning Act (1990); the legal basis for the most common form of developer contribution. This is because obligations under the 1990 Act can only be exacted in order to make a planning application compliant with regulations. Permitted Development rights are, theoretically, already compliant with planning regulations. In most instances permitted development is, therefore, definitionally distinct from development that takes place under regular planning consent. Therefore, in most cases, Local Planning Authorities do not seek to utilise the powers granted to them under Section 106 of the Town and Country Planning Act (1990) to negotiate a developer contribution on a scheme introduced under PD rights. However, through the prior approvals process LPAs can consider highways impacts, flooding, noise and land contamination issues on many larger schemes that come through this route. It is, therefore, possible for LPAs to refuse a scheme at the prior approval stage on these grounds or, as this research demonstrates (as discussed in Chapter 6), more commonly apply conditions at the prior approval stage to secure acceptable mitigation. In this sense, some of the conditions that may be placed on a scheme through prior approval acts in a similar way to a Section 106 planning obligation. In some rare cases, previous research has shown that this has extended to a financial contribution (Clifford et al, 2018).[39]

In this study only one of the schemes that were considered included planning obligation-like conditions on a permitted development scheme and, in interview, ten of the LPAs stated they do not seek such contributions on PD only schemes. However, several did secure developer contributions through S106 agreements applied to planning applications that accompanied the PD schemes in question.

A more regularly employed approach to securing developer contributions on PD schemes is the Community Infrastructure Levy introduced through the Planning Act 2008 and amended by the subsequent CIL regulations of 2010 (as amended, 2019). CIL is a locally-set fixed charge on development which usually takes the form '£X per square metre of new development'. Where a development is permitted under a general consent including prior approvals and permitted development in a CIL-charging authority CIL will be liable. The exception to this is where the development is less than 100 square metres of new build floorspace and no new dwelling is created (known as the 'minor development exemption').[40] There is a further exemption, however, for change of use schemes: if no new floorspace is created and the existing floorspace was in lawful use for at

[39] 'Assessing the impacts of extending permitted development rights to office-to-residential change of use in England' at https://www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/assessing-the-impacts-of-extending-permitted-development-rights-to-office-to-residential-change-of-use-in-england-rics.pdf

[40] 'Community Infrastructure Levy Relief and Exemptions' at https://www.gov.uk/guidance/community-infrastructure-levy#relief-and-exemptions

least six months out of the previous three years, then conversion will be exempt from CIL, even if it creates new dwellings.[41] Further, if a PD scheme is undertaken in a CIL-charging authority where some areas are rated as 'nil CIL' (i.e. a rate of CIL of 0%) no developer contribution through this mechanism will result.

In this chapter we draw on a parallel piece of research commissioned by the Ministry of Housing, Communities and Local Government on the value and incidence of developer contributions to understand the relationship between permitted development rights and developer contributions. In combining the findings of this related project with data collected through this project we are able to present evidence on the level of developer contributions that have been secured directly or in relation to development that has come forward under PD rights. We are also able to use the results of a national survey of LPA officers conducted as part of the project on developer contributions to report on LPA officers' expectations regarding the suitability of developer contributions policy to cover PD schemes.

Developer contributions and PD rights: the national picture

As CIL is the principal way in which an LPA could exact a contribution from a developer on a PD site it makes sense to take as an initial question how much CIL has been raised on PD schemes. To answer this question we can turn to a national survey of LPAs in England conducted for a parallel piece of research commissioned by the Ministry of Housing Communities and Local Government for the period 2018/19 (Lord et al., forthcoming).[42]

Community Infrastructure Levy is a compulsory charge on development where the local planning authority has designated that the particular development type and location is liable. LPAs are able to decide whether or not to adopt CIL, to determine which areas of the authority are liable and the price of CIL (subject to public consultation and an independent examination). The geography of CIL charging authorities in England is set out in Figure 12.

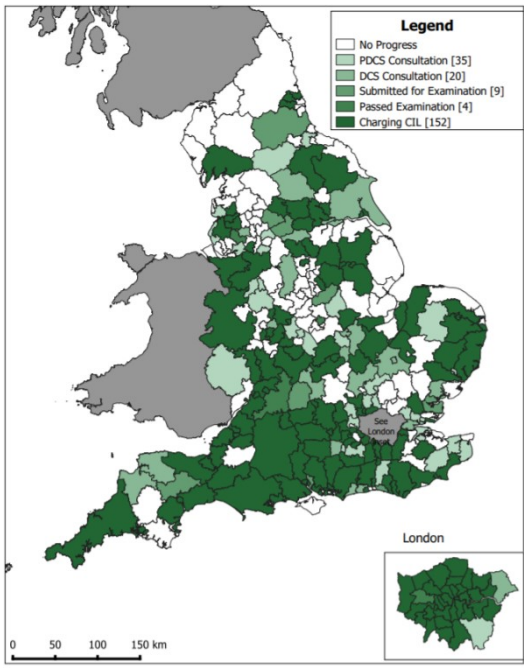

Figure 12: CIL and non-CIL charging authorities in England

[41] 'Calculating the levy liability' at https://www.gov.uk/guidance/community-infrastructure-levy#calculating-the-levy-liability

[42] Lord, A., et al. (forthcoming) 'The Value and Incidence of Planning Obligations and Community Infrastructure Levy 2019', Ministry of Housing, Communities and Local Government.

In a survey of Local Planning Authorities in England in 2019, one quarter of CIL charging authorities (15/134 all responding authorities) indicated that they had charged one or more permitted development as CIL liable over 2018/19. Of those that had charged a permitted development with CIL, 50% charged less than ten permitted development right permissions. From the survey evidence it is not possible to indicate the value of CIL liable permitted developments. However, given the small proportion of developments being charged CIL it is likely that the overall value is only a small proportion of the overall value of CIL levied.

The local policies of case study authorities in relation to CIL and S106

Of the LPAs that were considered in depth for this research 7/11 (63%) were CIL charging authorities at the time that the research was undertaken. As PD schemes are sometimes accompanied by planning applications for additional development, all local authorities could in theory extract a developer contribution for these additional developments through either S106 and/or CIL (subject to local thresholds and viability). It is not possible to disaggregate the value of CIL on PD schemes from S106 contributions on development related to a PD scheme from the survey data (from the value and incidence of developer contributions survey work). However, it is possible to estimate the proportion of PD residential schemes that are charged CIL on average in England and within each region, see Table 17. Approximately one third of Residential Permitted Development schemes commenced in 2018/19 were liable for CIL charges (may include zero charge).

Table 17: Average number of Residential Permitted Developments for CIL charging authorities and proportion of schemes commenced that are liable for CIL

	Average number of Residential Permitted Developments…		**Proportion of PD commenced residential schemes liable for CIL**	**Number of responses**
Region	**…commenced**	**…liable for CIL**		
East	5	0	0%	7
East Midlands	20	0	0%	4
London	52	11	21%	10
North East	19	0	0%	2
North West	U/K	U/K	N/A	2
South East	20	9	45%	20
South West	0	0	N/A	4
West Midlands	9	7	78%	6
Yorkshire and the Humber	11	2	18%	5
England	19	7	37%	60

Source: Lord et al (forthcoming)[43]

For the case study authorities that comprise this research, data was collected on developer contributions recovered on specific schemes. Although not generalisable this data provides an insight into how LPAs are using the powers available to them to exact developer contributions in relation to Permitted Development Rights.

The majority of LPAs reported that they did not secure any developer contributions on PD schemes. In some cases, this was because they were a non-CIL charging authority and none of the PD schemes that had come forward in the LPA area were accompanied by any chargeable additional development. In circumstances such as this there would be no mechanism available to the LPA to exact a developer contribution. In some cases where a PD scheme has been accompanied by

[43] Lord, A., et al. (forthcoming) 'The Value and Incidence of Planning Obligations and Community Infrastructure Levy 2019', Ministry of Housing, Communities and Local Government.

additional development this has been for a modest number of additional dwellings. As many LPAs do not apply Section 106 obligations to development of fewer than 10 dwellings this may be another reason why few LPAs recorded any developer contributions on the schemes we considered.

In other areas variations in the manner in which LPAs enact CIL means that development that has been undertaken under PD rights has been effectively outside the locally determined CIL charging system. For example, some CIL-charging authorities in the North and Midlands of England set a zero rate of CIL in weaker markets where evidence would suggest CIL is not viable. A significant number of the specific office-to-residential conversions that we considered in such LPA areas were located in the weaker market conditions offered by these inner urban areas. Consequently, under such circumstances, even where a PD scheme might represent a net increase in developed floor space the development may not be liable for a CIL contribution. Further, some developments may not have taken place were the developer required to provide larger or more costly housing. We have not undertaken comparative analysis between the quality of full planning application developments in different market contexts within each local authority for this research, but we would expect some correlation between housing quality in different market contexts. This variation will be against a baseline standard required for full planning applications within the authority that is different to the baseline standard for PDR.

In many cases, the conversions have been exempt from CIL charges, because no new floorspace was created and the existing floorspace was in lawful use for at least six months of the previous three years prior to change of use to residential.

The case study authorities

Table 18 shows the aggregate of developer contributions sought and remitted on the schemes that have been considered in the detailed desk research stage of this research (both under the PD and the FPA routes), according to the data sent to us by the authorities concerned.

In total six of the 11 case study authorities sought a developer contribution of any kind on either or both the PD scheme itself or a related planning application attached to the PD scheme. Of these five LPAs there is general distinction between high and low demand settings. The London Borough of Richmond alone accounts for 48.5% of all developer contributions sought. When considered together with Waverley in the Surrey commuter belt and Crawley the aggregate total (£736,936) accounts for 85% of developer contributions sought.

By contrast some LPAs in the North and Midlands have secured far less from the sites that have been considered. Derby, Manchester and Sunderland did not seek any developer contributions on the schemes in question. To a large extent this is explained by the fact that these are non-CIL charging authorities and so the most commonly applied method of exacting a contribution would not have been available to these authorities. However, it is worth noting that S106 contributions on development attendant to a PD scheme were confined to just two LPAs - Crawley and Richmond (Crawley had secured S106 payments on development consented through a FPA but associated with a primarily PD change of use scheme whilst Richmond had secured a S106 traffic management contribution in relation to the PD only scheme at 52-54 Glentham Road).

Outside this general account there are some LPAs that do not conform exactly to the characterisation. Sandwell's challenging market circumstances did not prevent exactions totalling £100,665 - of which the majority (96%) has been paid promptly. Similarly, Enfield in North London saw contributions of only £5,634 despite its location in an area of high demand.

Table 18: Developers contributions sought and realised on schemes in the case studies.

LPA and scheme type (as applicable)	Schemes on which a developer contribution has been sought	CIL charging?	Developer Contributions				
			LPA CIL sought	Mayoral CIL sought	S106 sought	Total sought	Total received
Bristol	Unknown	Y	*Data not supplied*				
Crawley *FPA development associated with a PD scheme (none from PD only schemes)*	*2*	*Y*	*123,559*	*N/A*	*22,345*	*145,904*	*54,079*
Crawley *FPA only schemes*	*1*	*Y*	*11,260*	*N/A*	*0*	*11,260*	*11,260*
Crawley *Total*	3	Y	134,819	N/A	22,345	157,164	65,399
Derby	0	N	N/A	N/A	0	0	0
Enfield *Total is from an FPA only scheme (none from PD schemes)*	1	Y	5,634	0	0	5,634	0
Huntingdonshire	0	N	N/A	N/A	0	0	0
Manchester	0	N	N/A	N/A	0	0	0
Richmond *PD only schemes*	*3*	*Y*	*17,571*	*3,766*	*2,500*	*23,837*	*Data not supplied*
Richmond *FPA only schemes*	*9*	*Y*	*118,349*	*29,464*	*249,503*	*397,316*	
Richmond *Total*	12	Y	135,920	33,230	252,003	421,153	
Sandwell *PD only schemes*	*2*	*Y*	*79,632*	*N/A*	*0*	*79,632*	*79,632*
Sandwell *FPA only schemes*	*4*	*Y*	*21,033*	*N/A*	*0*	*21,033*	*16,746*
Sandwell *Total*	6	Y	100,665	N/A	0	100,665	96,378
Sunderland *Total*	0	N	N/A	N/A	0	0	0
Wakefield *PD only scheme*	*1*	*Y*	*12,984*	*N/A*	*0*	*12,984*	*0*
Wakefield *FPA only schemes*	*3*	*Y*	*10.851*	*N/A*	*0*	*10.851*	*8,642*
Wakefield *Total*	4	Y	23,835	N/A	0	23,835	8,642
Waverley *PD only scheme*	*4*	*Y*	55,654	*N/A*	*0*	55,654	46,014
Waverley *FPA only schemes*	*5*	*Y*	102,965	*N/A*	*0*	102,965	91,326
Waverley Total	8	N	158,619	N/A	0	158,619	137,340
		Totals (£)	**559,493**	**33,230**	**274,348**	**867,070**	**307,758**

** Waverly operated a locally-devised CIL-like 'Planning Infrastructure Contribution' charge with neighbouring LPAs at the time the schemes in question were developed before introducing CIL in March 2019. CIL figures also include payments levied on all development associated with the Thames Basin Heaths Special Protection Area and Sustainable Access Management and Monitoring*

*** Section 106 contributions represent the aggregate of cash and in-kind contributions*

These findings perhaps corroborate wider research on developer contributions that suggests that a combination of both market conditions and LPA behaviour are important in accounting for why some LPAs are able to achieve more than might be expected given their market context (Lord et al., 2019).[44] These behavioural aspects of developer contributions relate to both negotiation practices with respect to S106 contributions and the manner in which CIL rates are determined and applied.

Perceptions of local planning authorities

To explore LPA officer perceptions regarding the relationship between PD rights and developer contributions we can turn to the survey which asked respondents to consider a hypothetical scenario, that if a planning application rather than permitted development was brought forward whether they would have sought a s106 contribution. 73% of LPA survey respondents agreed that if permitted developments had been submitted as a planning application then they would have been liable for s106 planning obligations. Only 5% of LPA's disagreed with the statement. The survey responses are indicated by region in Table 19, but the limited number of responses for some regions suggests that the precise proportions should not be considered statistically robust.

Table 19: To what extent do you agree with the following statement: If development had been brought forward under a planning application rather than permitted development right, our authority would have sought a section 106 contribution

	Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	Number
East	1	5	0	0	0	3	9
East Midlands	5	5	2	0	0	5	17
London	5	1	3	0	0	2	11
North East	0	1	2	0	0	1	4
North West	2	4	2	0	0	4	12
South East	12	6	6	1	0	5	30
South West	1	1	3	2	0	3	10
West Midlands	2	2	0	1	0	3	8
Yorks & Humber	1	5	0	1	0	0	7
Total	29	30	18	5	0	26	108

Source: Lord et al (forthcoming)[45]

From the survey itself, it is also impossible to further unpack what the 'don't know' responses mean. Some associated interviews conducted with LPAs as part of that same research project, however, suggests that this reflects the fact that many have very little insight into development viability with respect to PD, because they have not had to consider it for change of use schemes under PD which are not considered liable for S106. They are therefore not sure what they would request in practice for such schemes if they could.

When combined with the case specific data presented in the preceding section, this strong support amongst LPAs for greater capacity to exact developer contributions, may point to the potential for developer contributions to support PD schemes. Our case study analysis shows that in some of the

[44] 'Virtuous or vicious circles? Exploring the behavioural connections between developer contributions and path dependence: Evidence from England' at https://doi.org/10.1016/j.geoforum.2019.07.024
[45] Lord, A., et al. (forthcoming) 'The Value and Incidence of Planning Obligations and Community Infrastructure Levy 2019', Ministry of Housing, Communities and Local Government.

strongest markets, even with the limited range of instruments available to LPAs, it is still possible to exact developer contributions on office-to-residential permitted development. The extension of existing policy on developer contributions to development initiated under permitted development rights may unlock valuable supporting investment.

Key findings

Developer contributions on PD schemes are geographically variable

- National evidence on developer contributions exacted on permitted development rights would suggest that only in the strongest markets is there existing evidence of permitted development being subject to CIL

The nature of PD schemes means that they are regularly outside the scope of developer contributions policies

- One of the reasons why PD may not be regularly subject to a developer contribution relates to the restriction on the instruments that can be used (PD alone is generally held to not be able to be subject to a Section 106 agreement).
- Variations in how CIL-charging LPAs operate the Community Infrastructure Levy mean that PD rights sometimes fall outside CIL liability, combined with the exemption for schemes creating no new floorspace where part of that floorspace was in use for at least six months of the three years prior to conversion.
- Where development initiated under PD rights is accompanied by development for which there is a planning application, the attendant development sometimes falls below the threshold for which a Section 106 agreement would be negotiated.

LPA officer perception would suggest that developer contributions could be exacted on PD schemes

- A national survey of LPA officers would suggest that there is widespread support for considering the extension of Section 106 powers to cover PD rights: 73% of respondents agreed that if permitted developments had been submitted as a planning application it would have been liable for Section 106 planning obligations. Only 5% of LPA's disagreed with the statement.

8. Understanding developer perspectives

Introduction

The establishment of permitted development rights has had variable effects on the development industry. Research has illustrated that there is spatial variation in the delivery of developments under PD rights (Bibby et al., 2018),[46] Some markets have seen a significant increase in development undertaken under these powers whilst others continue to be dominated by traditional planning applications (Derbyshire and Havers, 2015).[47] Further, whilst some established developers have sought to use permitted development rights to undertake schemes there has also been the emergence of a new type of developer who specialises in permitted development.

In this chapter we report findings from a programme of 12 interviews conducted with a range of developers and their agents, including architects and planning consultants. In total of the 12 interviews that took place 4 were with developers and 8 with planning consultants/agents. Interview participants represented a broad cross section of development professionals active across the full national geography with each of the eight regions of England being represented by at least one interviewee (with the exception of the South West).

Developers value PD for making the process more rapid and cost-effective

For many interviewees the principal advantage of using permitted development rights to undertake development was that it was understood to remove some of the barriers to bringing a proposal forward. Some referred explicitly to the fact that development undertaken under the PD regulations can be more cost-effective and requires fewer reports than a free-standing planning application.

The generally simpler nature of the system was a great attraction for many developers and their representatives. With respect to planning consultants the reduced level of fees was an important aspect of PD that meant they felt a professional obligation to advise clients to take the opportunity to take the PD route wherever it was legally possible.

When practiced effectively it was argued by some interviewees that the opportunity to pursue conversions under permitted development rights brought buildings back into a productive use that would otherwise have remained dormant. The most positive testimony on the benefits of PD rights supported the view that it diminishes the costs and bureaucracy that might otherwise have been a barrier to bringing commercial buildings back into use. For some interviewees this was understood as providing the development industry with an opportunity to think creatively about redeveloping under-utilised assets. The most positive interviewees described conversions that had been delivered more rapidly than if they had been pursued through a formal planning application and had resulted in good quality housing, often in areas of under supply.

Variations in quality and market conditions

In accounting for variation in the quality of PD schemes, some developers pointed to this issue of market conditions as the most important explanatory variable. For some interviewees the likelihood that a developer would invest in enhancing the quality of a PD scheme was strongly related to the

[46] 'The Exercise of Permitted Development Rights in England Since 2010' at https://www.rics.org/globalassets/rics-website/media/knowledge/research/research-reports/the-exercise-of-permitted-development-rights-in-england-rics.pdf

[47] 'Office-to-residential conversions under permitted development: De-regularising the planning system' at https://www.ingentaconnect.com/content/hsp/jbsav/2015/00000003/00000004/art00004

broader market context. Developers who emphasised quality most infrequently also referred to quality and standards as being a result of markets forces, particularly in higher demand settings.

In these circumstances several developers argued that there was no distinction between the quality of what they had produced through PD schemes and what would be forthcoming under a regular planning application.

Outside high demand settings, however, the testimony of development industry professionals suggested that there are a wide range of experiences with respect to the quality of permitted development schemes. Several interviewees articulated anxieties about both schemes they were familiar with and, in a small number of instances, schemes with which they had been actively involved. Specific qualms included the absence of regulatory space standards and issues such as refuse disposal and collection.

For some interviewees these issues represented outcomes that were more likely in low demand settings where values are not sufficiently high to incentivise additional investment by the developer. The consequence was said to be some instances of poor-quality development that provides very small units that would not meet the regulatory standards were they the subject of a regular planning application.

This recognition that PD is enabling some development that would otherwise not achieve planning consent was a common source of concern for many interviewees. However, it should be noted that in a minority of cases, interviewees argued that PD provides the opportunity to supply much needed affordable housing to the market that would otherwise not be possible if all development had to comply with nationally described space standards. Three interviewees argued that PD allows the market to provide low-cost housing for which there is a demand and suggested that driving up standards would also drive up prices.

Potential changes to PD suggested by the development industry

One representative of the development industry argued that greater disclosure of the standards that would be delivered through any conversion could be introduced in the prior approvals process to make clear what the character of the conversion would be. This could include a greater level of detail on floor plans and the level of reporting required at the prior approval stage.

Other interviewees argued that greater clarity would help developers understand the circumstances under which permitted development rights were applicable or not. For one interviewee who had sought to undertake a complex residential conversion in a building that had been used to accommodate multiple uses it was argued that there was not sufficient clarity in the guidance regarding whether the development could be fully classed as permitted development or not. In corroborating this point several interviewees argued that it is not always clear what might could be understood as falling within permitted development rights. One interviewee described an occasion where they had pursued a full planning application, despite believing that the development was permissible under the PD regulations, to avoid the possibility of any subsequent legal challenge.

A common theme in many of the interviews was a recognition that it could be desirable to diminish the degree of variability in the quality of schemes that have been delivered under permitted development. For example, several interviewees pointed to the potential for local authorities to exercise some influence over the quality of development both with respect to internal floor plans and also the visual amenity of office-to-residential conversions. This view was echoed by other interviewees who argued that the benefits of PD – lower costs and a more rapid process – would not necessarily be compromised by a slightly greater degree of scrutiny regarding standards of living accommodation. Others extended this logic to argue that some degree of LPA control might be warranted with respect to the visual impact of some PD schemes, particularly where an office-to-residential scheme has not been accompanied by work to the façade of the building.

There remain questions, however, regarding the degree to which any potential amendments to the PD regulations might have geographically variable consequences. In general, the interviewees who suggested additional regulation to drive up standards in PD schemes were those operating in areas of higher demand. Equivalently, those who articulated concerns that additional regulation would affect margins and limit the potential of developers to provide small, affordable units operated primarily in more challenging markets. Variations in quality may well be strongly related to market circumstances.

Key findings

Developers and their agents argue that PD speeds up the process by which development comes forward

- PD can speed up the time taken to develop a site, although this is not a major factor in all PD.
- Many interviewees argued that PD rights were appealing because they represent cost savings and a reduction in the regulatory aspects of planning control.
- For planning consultants, it is has become normal practice to advise clients to take the PD route wherever it is legally available.

Developers and their agents perceive that the schemes produced under permitted development rights are variable

- The nature and quality of schemes that are delivered through PD vary. Testimony suggests that in strong markets PD can result in good quality development that is not significantly different to what might have been delivered under a traditional planning application.
- In weaker markets, particularly in urban England, office-to-residential conversions may be of a lower quality especially where this is designed to provide very small dwellings or dwellings with limited attendant amenities.

Some modifications to PD rights might be welcomed by the development industry

- Interviewees argued for improved consistency in the designation of PD by local planning authorities, perhaps encourage by further central regulatory guidance.
- Some interviewees argued that a slightly greater degree of disclosure of the proposed scheme at the prior approval stage might help provide local planning authorities with confidence that a proposed scheme is of a suitable quality.

9. Conclusions

Through this research, we have compared a significant number of buildings and dwelling units created through three broad categories of permitted development right (office-to-residential, retail / sui generis-to-residential, and storage / light industrial-to-residential) with similar schemes created through full planning permission consent. These schemes have been spread across 11 very different local authority case study areas (Bristol, Crawley, Derby, Enfield, Huntingdonshire, Manchester, Richmond, Sandwell, Sunderland, Wakefield and Waverley) which represent very different locations in terms of their geography, built environment character and socio-economic context. We have also interviewed planners from those 11 authorities (in many cases two planners per authority) to gain an understanding of their experience of PD. We have interviewed 12 developers or agents working for developers who have been involved in change of use schemes. We have also collected data on planning contributions from our case study schemes in this research, but also from a national survey being led as separate research also commissioned by MHCLG.

In considering the quality of residential units created through permitted development, in comparison to the quality of those created through a planning permission consent, the situation across all measures considered is mixed and more nuanced than a straightforward conclusion that planning permission units are always of a higher standard than permitted development units. In relation to measures like the exterior appearance of buildings, visible alterations made, energy performance, access to services and green space, and the deprivation level of the neighbourhood location, there are no significant differences seen when considering schemes consented through the two routes across all case studies. This does not mean that schemes under either route perform perfectly on these measures, but suggests a significant difference has not resulted from PDR per se. It is also notable that about a third of PD schemes actually involve an associated planning permission to make exterior alterations to buildings.

More significant difference does emerge, however, when considering performance against nationally described space standards, the arrangement of windows, access to amenity space, and the location in terms of immediate surroundings. In terms of immediate surroundings, for the majority of PD conversions there was little difference compared to planning permission schemes, with most created under both consenting routes located in local high streets, mixed use town and city centres and primarily residential areas. There were, however, notably more PD schemes located in primarily commercial areas (like business parks) and primarily industrial areas than planning permission schemes (7.9% of PD schemes compared to 1.0% of FPA schemes; about eight times more). Our site visits suggested that these usually offered extremely poor locations in terms of residential amenity.

Overall, only 22.1% of dwelling units created through PD would meet the NDSS, compared to 73.4% of units created through full planning permission. In many cases, the planning permission units were only slightly below the suggested standard, whereas the PD units were significantly below. There is thus a large quantum of very small units created through permitted development, particular driven by large office-to-residential conversion schemes (with larger schemes in terms of the number of dwelling units delivered having, on average, smaller unit space sizes than schemes involving a smaller number of units being created). Further, 68.9% of the units created through PD were studios or one bedrooms compared to 44.1% of the FPA units. As previous research has evidenced, smaller unit sizes and a mix of units that might not match local need can cause concern in terms of potential overcrowding and the health and wellbeing of occupiers.

In terms of the arrangement of windows, 72.0% of the dwelling units created under PD only had single aspect windows, compared to 29.5% created through planning permission, whereas 67.1% of the planning permission units benefitted from dual or triple aspect windows compared to only 27.3% of PD units. This does not consider more detailed aspects such as the size of the windows, their arrangement in relation to the layout of the unit, or their outlook (which cannot always be determined

from the type of information submitted through the prior approval process), but is suggestive of PD units having worse natural daylight and sunlight than planning permission units, another factor which has been linked in existing research to the mental health and wellbeing of residents. We found ten units (0.4% of the PD units considered in our research) which appeared to have no windows at all (none existed through planning permission). Building Regulations do not actually require a dwelling to have a window and this is not something that an LPA can consider through the prior approval process, but it is obviously of serious concern in terms of residential quality.

Regarding amenity space, just 3.5% of the PD units we analysed benefitted from access to private amenity space, compared to 23.1% of the planning permission units. It is the combination of very small internal space standards, a poor mix of unit types, a lack of access to private amenity space / outdoor space, and low levels of natural light which can provide an extremely poor residential experience in some permitted development units. The small space standards, poor window arrangements and lack of access to amenity or outdoor space are all worse in office-to-residential schemes than the other categories of PD (and all the units without windows were in converted office buildings).

Given these considerations, we would conclude that permitted development conversions do seem to be more likely to create worse quality residential environments than planning permission conversions in relation to a number of factors vital to the health, wellbeing and quality of life of future occupiers. These aspects are primarily related to the internal configuration and immediate neighbouring uses of schemes, as opposed to the exterior appearance, access to services or broader neighbourhood location. In office-to-residential conversions, the larger scale of many conversions can amplify residential quality issues. It is important to note, however, that not every PD scheme is providing a low quality residential environment.

Further variability is noticeable in the fact that although the percentage of units meeting space standards is higher under planning permission than permitted development in all 11 of our case studies, there is still significant difference between the percentages meeting the standard between each LPA. This can be seen in relation to both PD units (where the LPA cannot control the design) and planning permission units (where the LPA in theory can). The drivers of lower residential quality are multiple, with complex interactions likely to explain the situation in any one location. Looking at our own data analysis, as well as interviews with developers, the local socio-economic situation does appear to have an influence on quality, for example the levels of deprivation, average house prices and average office rents. In general, lower quality housing is more likely to be produced in areas where there are higher levels of deprivation and where office markets are suffering from a lack of demand and obsolescence. The type of buildings available for change of use in the local built environment (and so likelihood of large office conversions) also appears to be significant.

For many factors considered, a relationship between the factor and local performance against space standards (as a key measure of residential quality) was much more apparent for permitted development than planning permission units. This suggests that planning policy and decision-making processes are indeed playing a role in driving variations in quality where it can apply. The exact influence is, however, slightly complex to disaggregate given the overlaps between local plan policies (including adoption or not of NDSS through a DPD policy), supplementary guidance (which has often included, in the past, suggested local standards), the actual behaviour of decision-makers through the development management process, and viability issues.

The prior approval process itself is considered to be increasingly complex and resource intensive area for LPAs. There appears to be inconsistency, and even confusion, over when schemes are treated as ‘prior approval required and granted’ and when they are treated as ‘prior approval not required’. That about 10% of the schemes we sought to analyse had no publicly available floorplans at all does raise some concerns as well, given the usual expectations of public access to information about the actual layout of residential buildings.

Most PD change of use schemes avoid making any planning contributions at all, being considered not liable for Section 106 planning obligations and frequently able to avoid CIL payment through

creating no additional floorspace and having been at least partially occupied in use prior to the change of use. This concerns many LPAs, given that additional residential units does create additional pressure on local infrastructure (particularly social infrastructure but also potentially green infrastructure, given the lack of amenity space provision in so many schemes).

If higher design standards were required, for example compliance with NDSS, or the current CIL exemption possible in practice for most change of use schemes were removed, it is likely that fewer dwelling units overall would be delivered. From developer interviews, the number delivered would particularly be reduced in those locations with the most marginal development viability. It is difficult to quantify how many fewer units might be delivered through any raising of standards, particularly given that many developers seem unwilling to discuss the viability of change of use schemes, however a balance must clearly be sought between quality and quantity. Higher quality design standards may help to create better places for people to live, aligning with ideas of sustainable development and quality of life. Higher spec units may also be a better long-term investment, given potential future resale value and obsolescence of the residential conversions. In interview, some developers themselves appeared to be open to the idea of some design standards being applied through the prior approval process, so long as these did not unduly delay the consent.

To conclude, this research has revealed a more fine-grained understanding of the quality of residential units delivered through different categories of PD and a greater understanding of the wider influence of the market and developer preferences on quality. In some factors considered, such as external appearance, energy performance, access to services or neighbourhood deprivation, on average there was little difference between change of use schemes consented through permitted development and those consented through a full planning permission. However, there was a noticeable difference between schemes consented through the two routes in relation to the following key issues:

- Delivery against space standards for dwelling units
- The mix of units in a scheme (studios, one-bedroom flats etc.)
- Adequacy of natural light into dwelling units
- Access to amenity space (most significant for larger scale conversions)
- Immediate location (for example, if surrounded by neighbouring industrial uses)

Examples of these residential quality issues were found in all categories of PD considered. In terms of broader issues arising from this research, the following appear to stand-out:

- Inconsistent handling of prior approvals by local authorities
- Poor levels of supporting information associated with many prior notifications (particularly in relation to floorplans)
- The liability for CIL of change of use schemes (where CIL is adopted locally)

Appendix 1: Case Study One – Bristol

Introduction and planning context

Bristol is a city and unitary authority in the South West of England. It is one of the ten major 'core cities' of the UK.[48] The authority is classified as a 'large urban' local authority area and is led by a directly elected mayor. It is also part of the West of England combined authority (along with Bath and North East Somerset and South Gloucestershire), which is led by another directly elected mayor. The combined authority has powers over strategic planning and there has been work on a statutory spatial development strategy.[49] The city has a medieval core, significant Georgian urban development and the successive Victorian and twentieth-century suburban development typical of large English cities.

Bristol's current key local plan document is the *Core Strategy* adopted in June 2011.[50] This notes that the city is the largest in the South West region, has a relatively young population and faces population growth of 26% from 2006-2026. The strategy notes that the affordability of home ownership has decreased in Bristol over the last ten years, that in 2008 the average property price was more than seven times annual gross average earnings and that a Strategic House Market Assessment had estimated a net annual requirement for approximately 1,5000 new affordable homes to be provided in Bristol over the next 12 years. The plan envisages that 30,600 new homes will be provided in Bristol between 2006 and 2026. Affordable housing will be required in residential developments of 15 dwellings or more at a target of either 30 or 40% of units, dependent on location.

Policy BCS18 states that "All new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. To achieve an appropriate tenure, type and size mix the development should aim to:

- Address affordable housing need and housing demand;
- Contribute to the diversity of housing in the local area and help to redress any housing imbalance that exists;
- Respond to the requirements of a changing population;
- Employ imaginative design solutions.

Residential developments should provide sufficient space for everyday activities and to enable flexibility and adaptability by meeting appropriate space standards."[51]
Policy BCS21 also seeks to ensure that new development in Bristol should deliver high quality urban design.

At the time of writing, a new *Local Plan Review* document is being examined.[52] This calls for 2,000 new homes per annum to be built in the city from 2020, of which 800 should be affordable. The plan contains a proposed policy that "New development will be expected to reflect Bristol's urban character by maximising opportunities to re-use previously developed land and delivering high quality well designed environments at higher densities… Development will be encouraged to make efficient use of land by, where appropriate, developing under-used land and buildings and/or extending buildings upwards using the airspace above them."[53] The plan includes policies to ensure a minimum of 33,500 homes will be delivered by 2036; to ensure compliance of new residential

[48] 'Core Cities UK' at https://www.corecities.com/
[49] 'West of England Joint Spatial Plan' at https://www.jointplanningwofe.org.uk/
[50] 'Core Strategy' at https://www.bristol.gov.uk/documents/20182/34540/Core%20Strategy%20WEB%20PDF%20(low%20res%20with%20links)_0.pdf/f350d129-d39c-4d48-9451-1f84713a0ed8
[51] Ibid, page 112
[52] 'Local Plan Review' at https://www.bristol.gov.uk/planning-and-building-regulations/local-plan-review
[53] Ibid, page 55

developments with the accessibility requirements of Part M of Building Regulations and to ensure compliance with national space standards.

Sitting alongside these development plan documents, there is a supplementary planning document on *Planning Obligations* adopted in September 2012.[54] This specifies desired obligations in relation to a range of issues including affordable housing, highways infrastructure, trees, fire hydrants, landscaping and public realm, removing barriers to employment, supporting retail centres and travel plans. A CIL charging schedule has been in operation since January 2013.[55]

There is also an *Urban Living SPD: Making successful places at higher densities*, adopted in November 2018.[56] This contains advice on a design-led approach to optimising densities, and advises that all residential development should consider accessibility, internal spaces and layouts, noise and privacy, sufficient and well-designed private outdoor space and the provision of children's play spaces. It recommends single aspect homes are avoided, to maximise daylight, and that all new homes meet or exceed the nationally described space standards. This replaces an earlier *Space Standards Practice Note* from July 2011.[57]

As already noted, Bristol has seen a high rate of prior approvals and net additional dwellings related to permitted development. The council have not adopted any Article 4 Directions in relation to permitted development for the change of use of commercial buildings to residential use.

Figure 13, below, is a map illustrating change of use schemes through both the PD and FPA routes in Bristol, 2015-2018.

Local housing and real estate market

Bristol is the second largest city in our study, and has a thriving local economy with the highest percentage of economically active residents across all case studies. It has experienced recent growth in the office and retail markets, as new supply is coming onto the market across real estate sectors and demand for space remains high. Vacancy rates are low for both office (3.6%) and retail (1.1%) sectors, and high transaction volumes. Bristol is one of the 'big six' markets outside of London, and is attracting active investors and developers in the real estate and housing markets. Housing prices have continued to increase, with values up 37.8% in the last five years, and the house price to earnings ratio is currently 9.12, raising questions about the affordability of housing in the city.

[54] 'Planning Obligations' at https://www.bristol.gov.uk/documents/20182/34520/SPD%20Final%20Doc%20Dec2012.pdf/daf75908-50fd-4138-afed-770310a6a431

[55] 'Bristol City Council Community Infrastructure Levy Charging Schedule' at https://www.bristol.gov.uk/documents/20182/33588/CIL+Charging+Schedule.pdf

[56] 'Urban Living SPD' at https://www.bristol.gov.uk/documents/20182/34520/Urban+Living+SPD+Making+successful+places+at+higher+densities.pdf/ec07c68e-f068-8ff7-083e-04250462715a

[57] 'Space Standards Practice Note' at https://www.bristol.gov.uk/documents/20182/239427/WEB+Space+Standards+Practice+Note+Nov+11+amendment.pdf/d233b603-6093-44dc-921e-0f1218095085

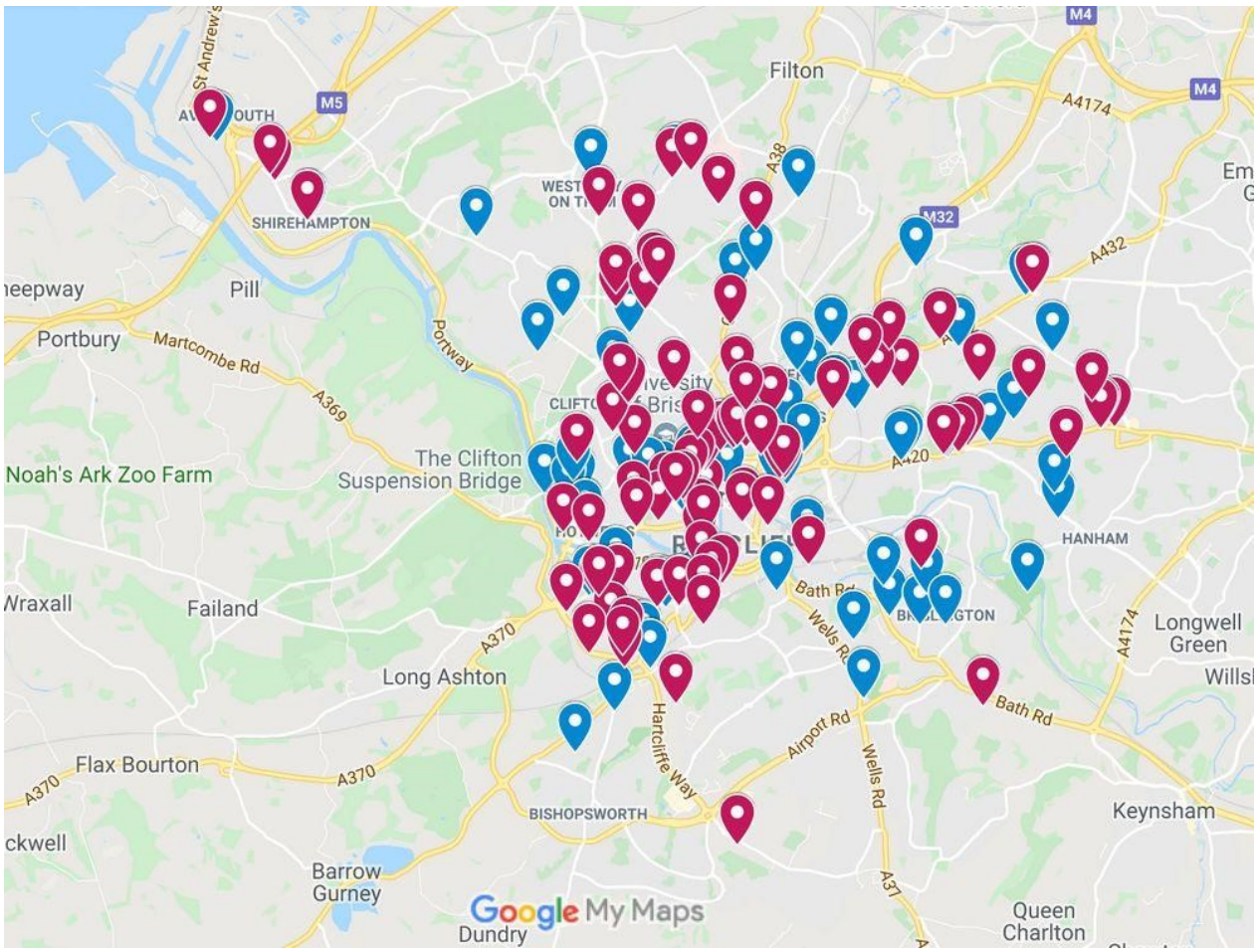

Figure 13: Map illustrating change of use schemes through both the PD and FPA routes in Bristol, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local authority views

Although Bristol has seen conversions in all categories of PD considered, it is the office-to-residential conversions in Bristol that appear to concern planning officers the most, and that have attracted media attention. Prior to PD rights for office-to-residential coming forward, there was a concern amongst planners in Bristol that there would be a negative impact on the strong office market in the city centre, partly because the city had already seen a trend towards conversion of offices in the city centre to student accommodation. An exemption for the city centre and recently designated Employment Zone was therefore sought but refused by the then Department for Communities and Local Government. Contrary to initial fears, the impact of PD rights in the city centre has, according to the planners, been limited by office values, which have remained strong. The Council has therefore not sought to intervene through an Article 4.

The local authority's perception of the impact of PD in Bristol was mixed. On the one hand, PD rights appear to have stirred the residential market in the city centre and brought forward some good quality residential conversions of some tired office blocks, where previously they seemed to be converted or redeveloped for student accommodation rather than housing. Extending PD has no doubt contributed to housing targets, but the local authority found the lack of control and ability to monitor this in relation to PD frustrating. Bristol's high streets still have good levels of occupancy, so the perception was that they were not seeing significant loss of high streets to residential. On the other hand, the quality of accommodation in some office-to-residential conversions coming forward is 'a worry' and there is felt to be a lost opportunity in terms of securing affordable housing, transport improvements and contributions to public realm schemes. In more peripheral areas of Bristol, local community groups have expressed concern about loss of local employment, where buildings occupied by small businesses are being converted to residential.

Bristol City Council has adopted the national space standards and has an Urban Living SPD, which provides design guidelines for tall buildings. According to the planners, most residential development going to planning committee is meeting those standards, but they weren't able to confirm if prior approval schemes are meeting those standards.

Planners spoke about the difficulty managing local politicians' expectations, given the extension of PD rights. For example, they mentioned a scheme that was near a music venue in the city centre, which had secured change of use through prior approval first, and then later the applicants applied for planning permission for external alterations (balconies, new windows etc). When the planning application went to planning committee for a decision, members found it difficult to accept that they were only able to consider the elevations of the scheme and were not able to make a decision on the principle of the change of use of a building near a music venue, since that had already been secured through prior approval. Against officer advice, the committee decided to refuse the application but the applicants won on appeal and costs were awarded against the Council. Not only did this reveal a problem with the complexity of the system running prior approvals and planning applications in parallel, but this confusion also ultimately extends the process and undermines the intention to speed up decisions.

Although office-to-residential PD is not permitted for conversion to purpose built student accommodation, there is nonetheless a perception within the local authority - based on conversations with developers and operators - that much residential accommodation coming forward through PD conversions is being occupied by students (either as private rental, or where parents purchase an apartment for them to live in during their studies). Alternatively, where schemes are being developed as social or managed accommodation, although Bristol has homelessness issues, there is a concern that vulnerable people are being placed in accommodation that falls short of space standards, often in remote locations in the city.

In summary, local authority views in Bristol are mixed. Initial fears of a sweeping loss of office accommodation in the city centre have not been borne out, and new housing is coming forward in the city centre - contrary to expectations - and some of this is of good quality and welcomed. However, officers struggle with an inability to control loss of office space for small businesses in more peripheral locations in the city, and to control quality in schemes that are not being converted by the established developers and operators. The rolling out of PD in Bristol is causing tensions with planning committee members and the inability to secure affordable housing and other S106 contributions towards local transport and public realm improvements is seen as a significant missed opportunity.

Assessing quality: site visits

Table 20 presents a summary of the data collected on our site visits in Bristol. Key headline findings are as follows:

- Bristol has seen **significant activity** in all categories. During the time period in question, 69 prior approvals were granted (47 office-to-resi, 20 retail/sui-generis and 7 light industrial/warehousing) and 57 planning permissions given (17 office-to-resi, 32 retail/sui-generis, 8 light industrial/warehousing).
- For both prior approvals and planning permissions, offices-to-residential conversions are most **likely to have been implemented** (72%, 94%), followed by retail/sui-generis-to-residential (60%, 82%), and lastly light industrial-residential (50% in both categories). Across all three categories, conversions through planning permission were more likely to be implemented than conversions through prior approvals.
- Of the schemes that have been converted, there are some notable differences in the **number of dwelling units observed** between the three conversion types, and between Prior Approvals and Planning Permissions (see Figure 14 and Figure 15 below). Larger schemes with higher numbers of dwelling units were more likely to be found in office-to-

residential conversions in general, but there was a greater prevalence of larger schemes (30+ units) in conversions through prior approval than through planning permission. Industrial-to-residential conversion in the borough tends to be very small scale, mostly 1-2 units, with little difference observed between PA and PP.

- There appears to be little difference observed between schemes with PA and schemes with PP in terms of **notable external alterations** (see Figure 16).
- From our observational site visits, there also appears to be little difference between PA and PP in terms of adequate **provision of refuse and mail facilities, access to green space, public transport**, although further analysis has been done on this in the desk-based research (see Figure 17 and Table 21)
- Finally, in terms of any additional facilities provided, there were few differences again (see Figure 18). A greater percentage of the PA schemes had associated car parking, perhaps a result of the fact that minimum car parking standards (encouraging sustainable travel) can be set when schemes go through planning permission, but not when they go through prior approval.

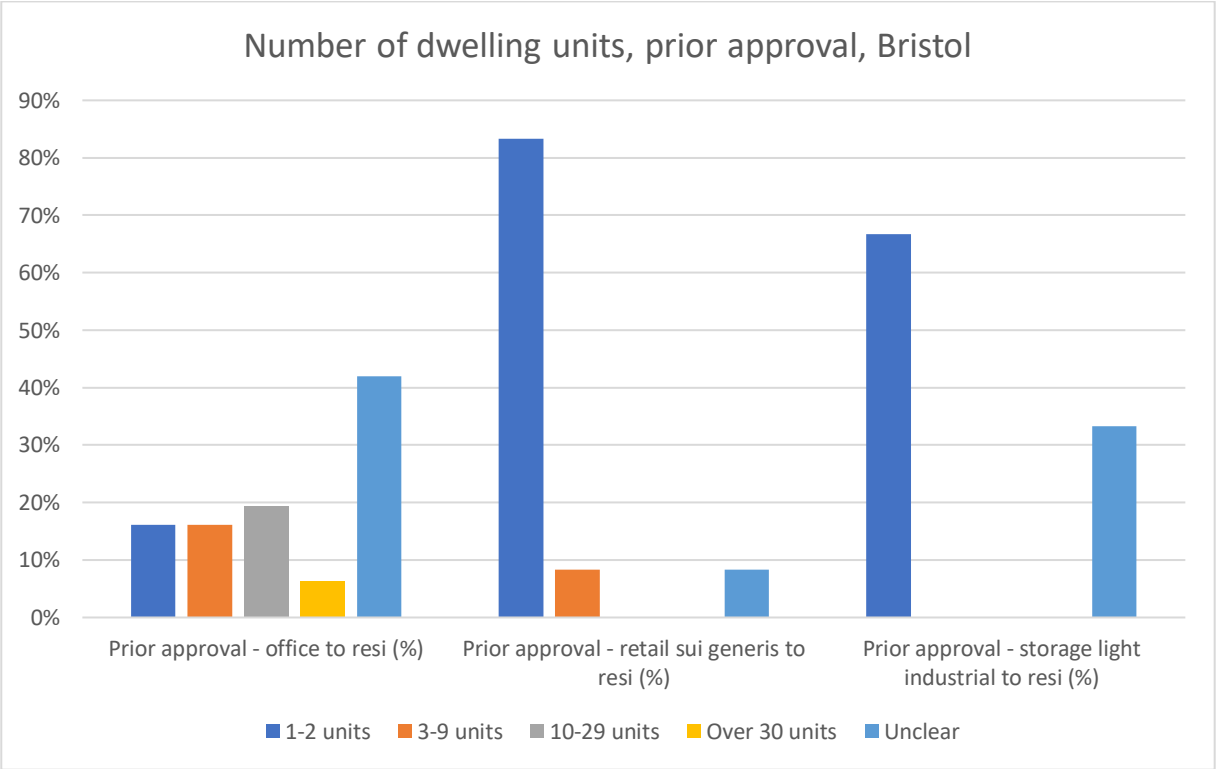

Figure 14: Number of dwelling units observed in schemes with prior approval, Bristol

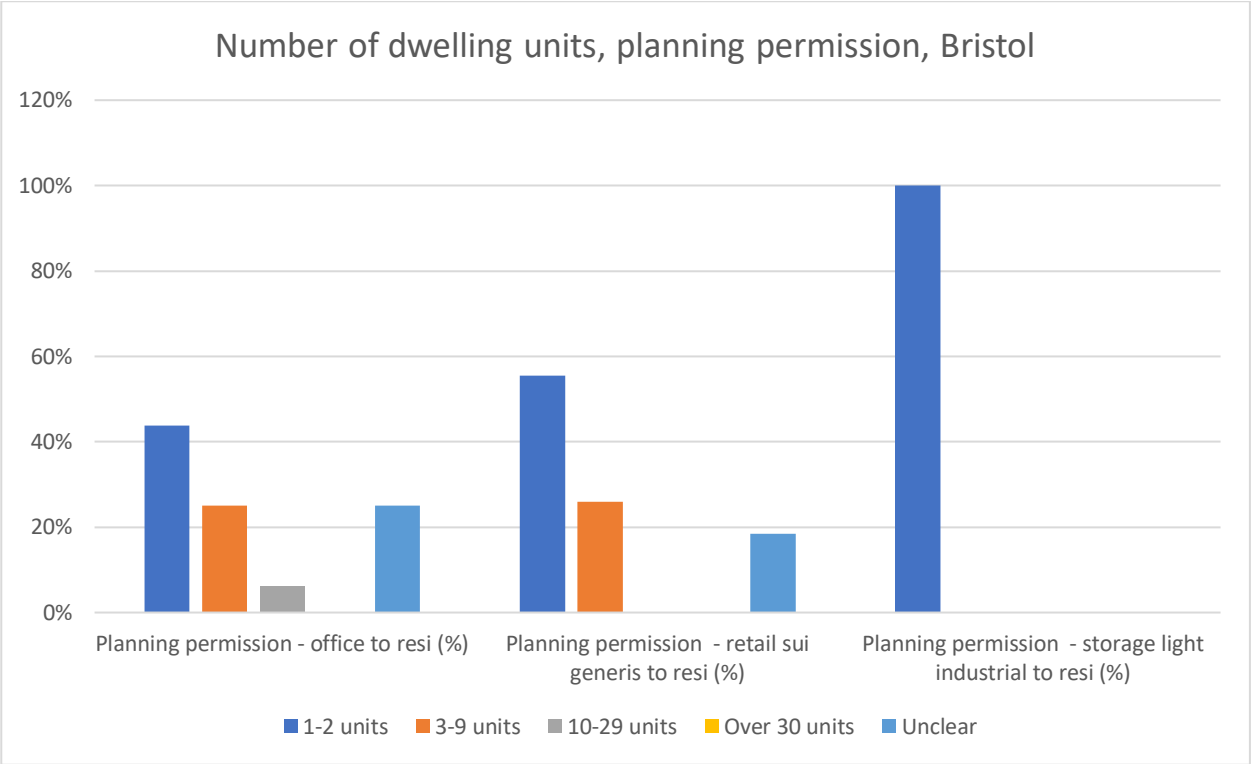

Figure 15: Numbers of dwelling units observed in schemes with Planning Permission, Bristol

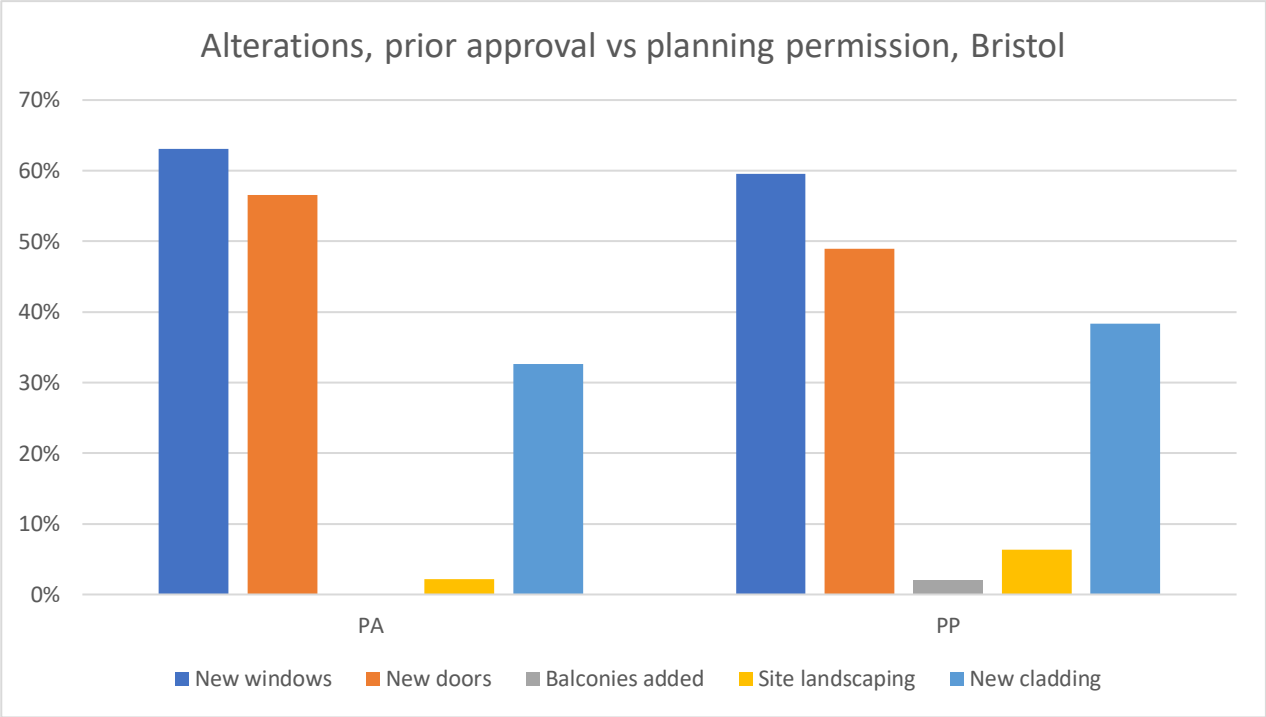

Figure 16: Notable external alterations, prior approval vs planning permission, Bristol

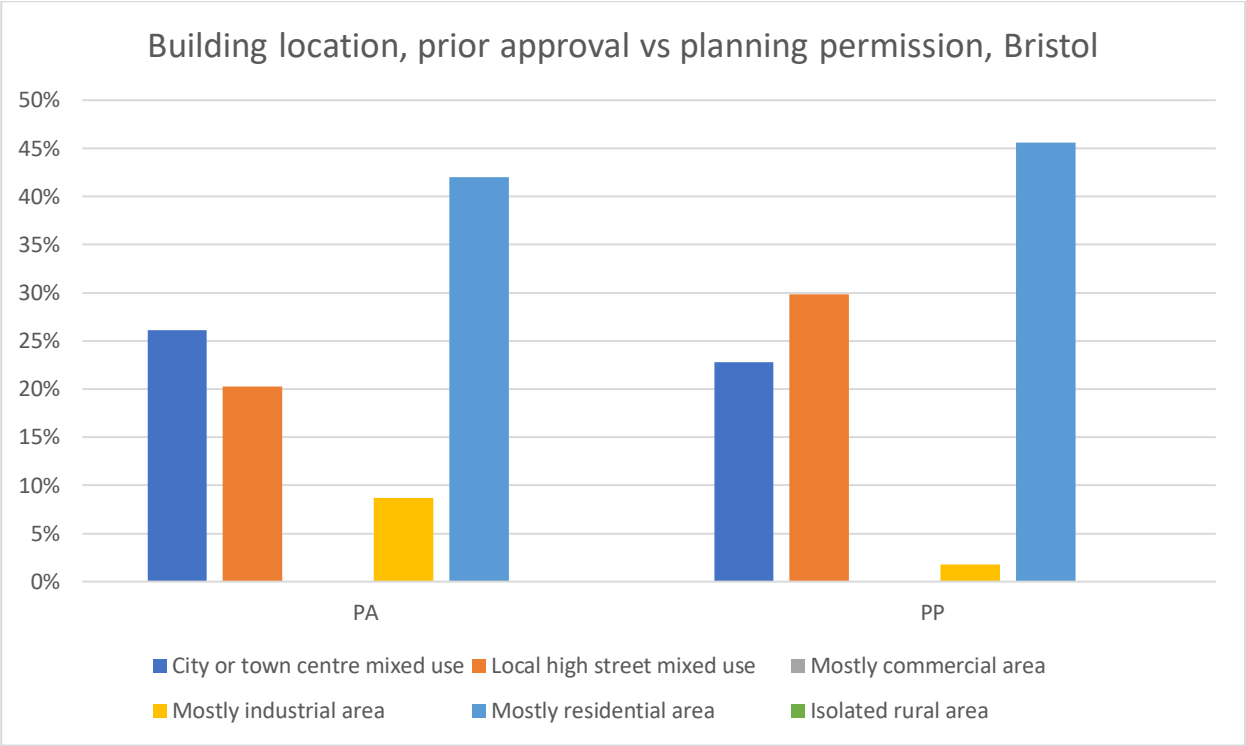

Figure 17: Building location, prior approval vs planning permission, Bristol

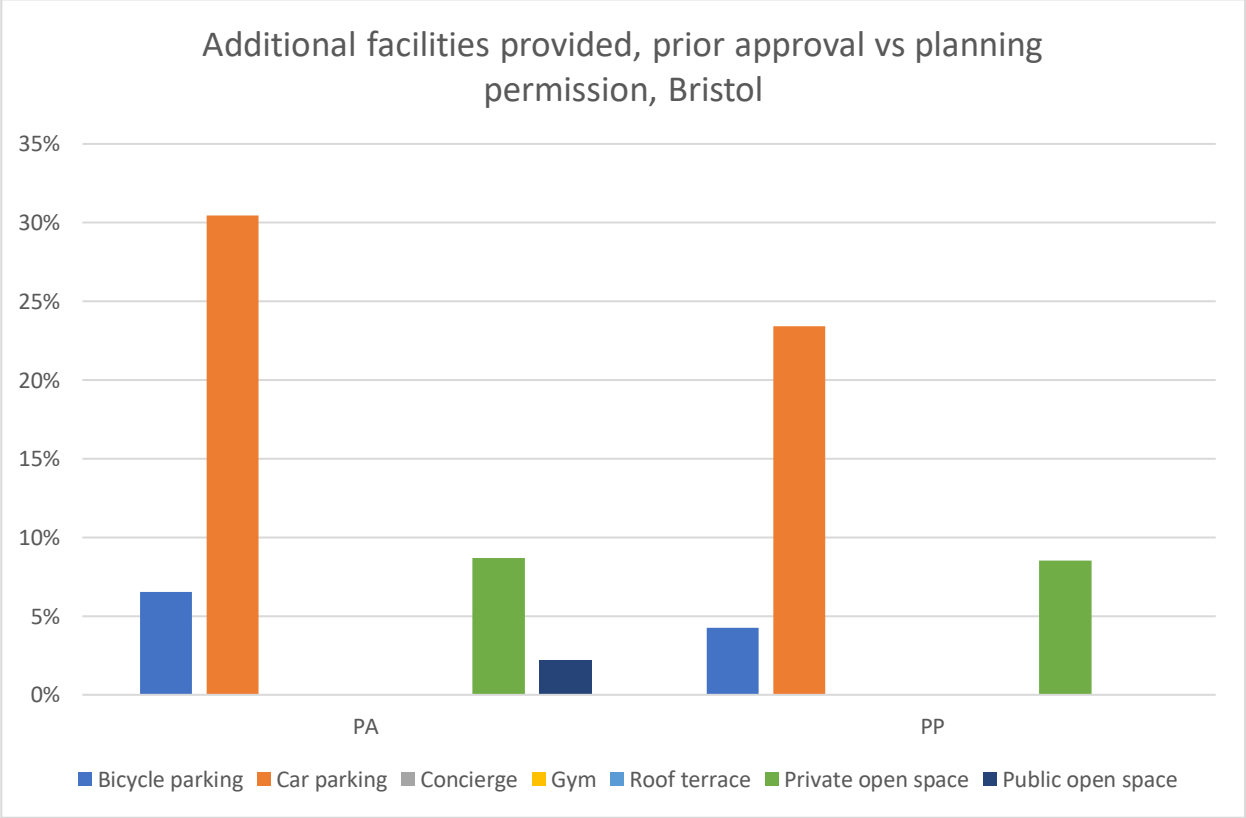

Figure 18: Additional facilities provided, prior approval vs planning permission, Bristol

Table 20: Results of site visits in Bristol

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	43	20	6	**69**	17	32	8	**57**
Current state:								
Conversion not started - vacant business premises	7%	25%	0%	**12%**	0%	3%	0%	**2%**
Conversion not started - partially occupied business premises	7%	0%	0%	**4%**	6%	3%	13%	**5%**
Conversion not started - fully occupied business premises	14%	15%	33%	**7%**	0%	6%	13%	**5%**
Conversion in progress	19%	10%	33%	**17%**	0%	16%	13%	**11%**
Conversion completed - vacant residential unit(s)	5%	15%	0%	**7%**	6%	9%	0%	**7%**
Conversion completed - occupied residential unit(s)	49%	35%	17%	**42%**	88%	59%	38%	**65%**
Unclear	0%	0%	17%	**1%**	0%	3%	25%	**5%**
Converted (total)	72%	60%	50%	**67%**	94%	84%	50%	**82%**
Building original use:								
Residential single dwelling	28%	70%	33%	**41%**	53%	56%	38%	**53%**
Residential apartment building	5%	0%	0%	**3%**	6%	3%	0%	**4%**
Office building pre-WWII	2%	5%	0%	**3%**	12%	3%	0%	**5%**
Office building 1950s-70s	16%	5%	0%	**12%**	0%	0%	0%	**0%**
Office building 1980s-present	23%	0%	0%	**14%**	6%	3%	0%	**4%**
Warehouse or light industrial building pre-WWII	2%	0%	0%	**1%**	0%	0%	38%	**5%**
Warehouse or light industrial building post-WWII	14%	0%	50%	**13%**	0%	0%	25%	**4%**
Light industrial ground floor / residential above	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail building post-WWII	0%	0%	0%	**0%**	0%	3%	0%	**2%**
Retail ground floor / residential above	9%	20%	17%	**13%**	24%	31%	0%	**25%**
No answer	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Average building height (number of floors)	3.0	3.0	2.0	**2.9**	3.0	3.0	2.0	**2.9**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	16%	83%	67%	**37%**	44%	56%	100%	**55%**
3-9 units	16%	8%	0%	**13%**	25%	26%	0%	**23%**
10-29 units	19%	0%	0%	**13%**	6%	0%	0%	**2%**
30 units +	6%	0%	0%	**4%**	0%	0%	0%	**0%**
Unclear	42%	8%	33%	**33%**	25%	19%	0%	**19%**
If converted, obvious notable alterations made:								
New windows	65%	67%	33%	**63%**	50%	63%	75%	**60%**
New doors	48%	83%	33%	**57%**	50%	48%	50%	**49%**
Balconies added	0%	0%	0%	**0%**	6%	0%	0%	**2%**
Site landscaping	3%	0%	0%	**2%**	0%	4%	50%	**6%**
New cladding	23%	67%	0%	**33%**	25%	44%	50%	**38%**
If converted, obvious additional facilities provided:								
Bicycle parking	10%	0%	0%	**7%**	6%	0%	25%	**4%**
Car parking	35%	25%	0%	**30%**	31%	15%	50%	**23%**
Concierge	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Gym	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Roof terrace	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Private open space	10%	0%	33%	**9%**	13%	4%	25%	**9%**
Public open space	3%	0%	0%	**2%**	0%	0%	0%	**0%**
Adequate provision made for waste / refuse	61%	83%	67%	**67%**	88%	63%	75%	**72%**
Adequate provision made for mail deliveries	68%	100%	67%	**76%**	13%	70%	75%	**51%**
Building location:								
City or town centre mixed use	42%	0%	0%	**26%**	35%	22%	0%	**23%**
Local high street mixed use	14%	35%	17%	**20%**	41%	28%	13%	**30%**
Mostly commercial area	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Mostly industrial area	12%	0%	17%	**9%**	6%	0%	0%	**2%**
Mostly residential area	33%	55%	67%	**42%**	18%	50%	88%	**46%**
Isolated rural area	0%	0%	0%	**0%**	0%	0%	0%	**0%**
No answer	0%	10%	0%	**3%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	74%	70%	67%	**72%**	94%	72%	38%	**74%**
Obviously accessible by public transport	86%	80%	50%	**81%**	94%	88%	88%	**89%**
Obviously close to local open or green space	65%	35%	50%	**55%**	76%	50%	50%	**58%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 41 implemented conversion schemes in Bristol are illustrated by Table 21, below.

Table 21: Results of desk based analysis of schemes in Bristol

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	12	6	3	**21**	8	8	4	**20**
Permission for change of use:								
Prior approval - one only	33%	67%	67%	**48%**	0%	0%	0%	**0%**
Prior approval - multiple	33%	17%	0%	**24%**	0%	0%	0%	**0%**
Planning permission - one only	0%	0%	0%	**0%**	50%	63%	25%	**50%**
Planning permission - multiple	8%	0%	0%	**5%**	25%	38%	75%	**40%**
Both prior approval and planning permission	25%	17%	33%	**24%**	25%	0%	0%	**10%**
Prior approval with associated planning permission	50%	0%	33%	**33%**	N/A	N/A	N/A	**N/A**
Number of units created	659	8	11	**678**	30	23	4	**57**
Average number of units per scheme	54.92	1.33	3.67	**32.29**	3.75	2.88	1.00	**2.85**
Unit sizes:								
Studio flats	52%	13%	82%	**52%**	0%	0%	0%	**0%**
One bedroom flats	20%	50%	9%	**20%**	17%	35%	0%	**23%**
Two bedroom flats	27%	25%	9%	**27%**	73%	52%	50%	**63%**
Three or more bedroom flats	1%	0%	0%	**1%**	7%	9%	0%	**7%**
Maisonette or house	0%	13%	0%	**0%**	3%	4%	50%	**7%**
Units complying with national space standards	18%	38%	45%	**19%**	93%	78%	100%	**88%**
Units with access to private amenity space	1%	38%	9%	**1%**	7%	30%	75%	**21%**
Buildings with access to communal amenity space	33%	0%	0%	**19%**	13%	13%	0%	**10%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Only skylights or rooflights	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Only facing an atrium	1%	13%	9%	**1%**	3%	4%	0%	**4%**
Single aspect	77%	13%	82%	**76%**	13%	17%	0%	**14%**
Single aspect / north facing only	14%	0%	27%	**14%**	7%	4%	0%	**5%**
Dual or triple aspect windows	23%	88%	18%	**24%**	87%	83%	100%	**86%**
EPC rating:								
A	0%	0%	0%	**0%**	0%	0%	50%	**10%**
B	8%	0%	0%	**5%**	13%	13%	0%	**10%**
C	33%	33%	0%	**29%**	0%	13%	0%	**5%**
D	25%	33%	33%	**29%**	0%	25%	0%	**10%**
E	17%	17%	0%	**14%**	50%	13%	0%	**25%**
F	8%	0%	0%	**5%**	13%	0%	0%	**5%**
G	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Could not tell	8.3%	16.7%	66.7%	**19.0%**	25.0%	37.5%	50.0%	**35.0%**
Council tax:								
A	37%	67%	0%	**39%**	30%	50%	25%	**36%**
B	47%	17%	0%	**36%**	20%	13%	0%	**14%**
C	11%	17%	0%	**11%**	30%	13%	0%	**18%**
D	5%	0%	33%	**7%**	20%	0%	0%	**9%**
E	0%	0%	0%	**0%**	0%	0%	0%	**0%**
F	0%	0%	0%	**0%**	0%	0%	50%	**9%**
G	0%	0%	0%	**0%**	0%	0%	0%	**0%**
H	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Could not tell	0%	0%	66.7%	**7.1%**	0%	25%	25%	**5%**
GIS Analysis:								
Average Index Multiple deprivation	3.30	4.50	4.30	**3.79**	5.50	3.60	3.50	**4.34**
Average Access to Public Green Space score	3.09	3.16	2.80	**3.07**	2.50	2.50	2.00	**2.40**
Walking distance to small supermarket	83%	100%	100%	**90%**	100%	100%	75%	**95%**
Walking distance to large supermarket	83%	67%	100%	**81%**	75%	88%	25%	**70%**
Walking distance to a bus stop	*Data not available*							
Walking distance to a rail station	58%	0%	67%	**43%**	38%	63%	50%	**50%**

The desk based research is based on an analysis of the following prior approval schemes:

- *1 Berkeley Crescent, Bristol; 1 Cotswold Road North, Bristol; 120 Coldharbour Road, Bristol; 127-129 East Street, Bristol ; 127-131 Raleigh Road, Bristol; 204 Bloomfield Road, Bristol; 21A Jacobs Wells Road, Bristol; 237 Hillside Road, Bristol; 272 Church Road, Bristol; 33 Baynton Road, Bristol; 4B-4C*

Kellaway Avenue, Bristol; 78 Princess Victoria Street, Bristol; 9 Minto Road, Bristol; 95A Chaplin Road, Bristol; Guild Heritage House, Braggs Lane, Bristol; Kenham House Wilder Street, Bristol; Kent House, 31-35 Prince Street, Bristol; Marlborough House, Marlborough Street, Bristol; Merchants House, South Wapping Road, Bristol; Park Edge, 359A Church Road, Bristol; Parkview Office Campus, Whitchurch Lane, Bristol; St Catherine's House, Dalby Avenue, Bristol; Stanhope House ,13 Victoria Road, Bristol; Trelawney House, Surrey Street, Bristol

And the following planning permission schemes:

- *114B Church Road, Bristol; 13 Portland Square, Bristol; 18 Great George Street, Bristol; 181 Whiteladies Road, Bristol; 20 Portland Square, Bristol; 211-213 Church Road, Bristol; 212 West Street, Bristol; 26 Ashton Road, Bristol; 265 Hotwell Road, Bristol; 47 Park Street (and 1 Great George Street), Bristol; 50 Belle Vue Road, Bristol; 58 Sherwell Road, Bristol; 7 New Station Road, Bristol; Clifton Down House, Suspension Bridge Road, Bristol; Eastwood Farm Depot, Whitmore Avenue, Bristol; The Bed Workshop, Braunton Road, Bristol*

Looking at this data, there are a reasonable number of schemes in each category available to consider in Bristol, however it is important to note that the office-to-residential prior approval schemes have considerably more units, on average, than any other category of scheme. The results show some tendency for prior approval schemes to be more likely to be studio or one-bedroom flats than planning permission schemes, and with notably fewer prior approval schemes complying with national space standards than planning permission schemes. Prior approval schemes were also much more likely to have single aspect windows than planning permission schemes and had lower average energy performance. The picture in relation to amenity space is slightly more mixed, with more planning permission units having access to private amenity space than prior approval units, but actually the inverse true in relation to communal amenity space. Prior approval schemes are in slightly more deprived locations, and with slightly worse access to green space. Accessibility to supermarkets was similar for both types of scheme.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 21m^2 in Kent House. The mean average of the smallest unit found in each prior approval scheme examined in Bristol was 46.6m^2. The smallest unit found in a planning permission scheme was the 35m^2 in 78 Princess Victoria Street. This was approved via a planning permission which had been sought to allow conversion and external alterations, but the planning officer report notes that there was an existing prior approval for this building which would offer the applicant a 'fall back' option to implement the conversion without exterior alterations should that permission have been refused. The mean average of the smallest unit found in each planning permission scheme examined in Bristol was 118.0m^2.

Conclusions

Bristol has seen a large number of change of use conversions both through the PD and FPA routes, even allowing for its population. The implementation rate of schemes is higher for planning permission schemes, and these schemes are much more likely (88% to 19%) to meet national space standards, as well as having dual aspect windows, a better mix of unit types and amenity space provision. About a third of PD schemes have an associated planning permission, and a very large number of units have been provided through PD. A number of the large PD schemes do indeed seem to have been for student accommodation, as suggested by local planners.

Appendix 2: Case Study Two – Crawley

Introduction and planning context

Crawley is a district authority within the West Sussex County Council area of the South East of England. It is classified as an 'Other Urban' authority and is a New Town, designated as such in 1947. I Gatwick Airport is located within the borough, which is within the sub-regional area known as the 'Gatwick Diamond'. As a New Town, Crawley has a large stock of post-war development, designed around a functional separation of land-uses. The administrative boundary of the authority fairly tightly binds the urban area.

The *Crawley Borough Local Plan 2015-2030* was adopted in December 2015.[58] The plan introduces design principles that it is expected all new proposals for development will be of high quality in terms of their urban, landscape and architectural design and provide a good standard of amenity. In particular, policy CH5 on standards for new dwellings states that "All new dwellings must create a safe, comfortable and sustainable living environment, capable of adapting to the changing needs of residents through the application of Building Regulations Part M Category 2 – accessible and adaptable dwellings. The minimum size for each dwelling should be based on the Nationally Described Space Standards" and "Residential developments should be designed to include amenity space standards adequate to meet basic privacy, amenity and usability requirements".[59] The plan states the borough requires 675 dwellings per annum and has a younger than average population for the region. It does, however, include a supply-led housing requirement figure of 340 dwellings per annum, necessary because of the limited land availability in the borough and constraints including aircraft noise and safeguarding for a potential future runway. The Plan identifies that the remaining unmet need will be delivered in neighbouring areas, a position accepted by neighbouring planning authorities in their respective Local Plans.Policy H4 of the Crawley Local Planstates that 40% affordable housing will be required from all residential developments.

Crawley's limited available land supply position also means that Crawley is unable to meet in full its employment land needs, and the Local Plan identifies an unmet need for 35 hectares business land that cannot be accommodated within the borough boundary. This places significant weight on the need to protect Crawley's designated Main Employment Areas for employment uses, to ensure that the important employment function of these locations is not undermined.

An *Urban Design Supplementary Planning Document* was adopted in October 2016.[60] The SPD sets out principles of good design and notes the design principles of the town itself, as a New Town, with a strong emphasis on residential neighbourhoods. It also sets out, for residential development, external private amenity space standards. This document superseded the former *Standards for New Housing Development Supplementary Planning Guidance Note*, which was used in connection with some developments considered during our period of analysis.[61] The former document included, amongst other topics, local guidance on the minimum size of new dwellings.

An *Affordable Housing Supplementary Planning Document* was adopted in November 2017.[62] This explains the 40% affordable housing requirement applies to all residential developments, albeit sites of less than five units can instead make payments in lieu instead of on-site provision. Viability approaches are also explained. A CIL charging schedule has been in effect since August 2016.[63]

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[58] 'Crawley Borough Local Plan' at http://crawley.gov.uk/pw/web/PUB271853
[59] Ibid page 32
[60] 'Urban Design Supplementary Planning Document' at http://crawley.gov.uk/pw/web/PUB279795
[61] 'Standards for new Development' at http://www.crawley.gov.uk/pw/web/int010322
[62] 'Affordable Housing Supplementary Planning Document' at http://crawley.gov.uk/pw/web/PUB318374
[63] 'Crawley Community Infrastructure Levy: Charging Schedule' at http://www.crawley.gov.uk/pw/web/PUB284391

Crawley Borough Council adopted Article 4 directions to restrict permitted development for conversion of offices and storage and distribution to residential in the Manor Royal area in July 2016 and another to restrict light industrial to residential conversion in the same area in October 2017. Figure 19, below, is a map illustrating change of use schemes through both the PD and FPA routes in Crawley, 2015-2018.

Figure 19: Map illustrating change of use schemes through both the PD and FPA routes in Crawley, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local housing and real estate market

Crawley is the smallest case study in our research by population, with the highest job density (1.41) and one of the lowest rates of unemployment (3.3%). However, the local authority is divided in terms of indices of multiple deprivation, with significantly higher levels of deprivation in the west of the

borough. The local authority area has become a popular location for international businesses in the South East, with companies like Nestle and Amazon occupying office space there (CoStar, 2019). However, there is little to no new supply of employment floorspace emerging onto the market (although there are apparently schemes in the pipeline), rental levels are volatile and the office sector has particularly high vacancy rates at 10% (particularly in low grade accommodation). In contrast, retail in Crawley in the last year has seen low vacancy rates (0.7%) and higher rates of rental growth (4.1%). The number of transactions in the housing market has decreased in the last five years, and prices have increased. The area has an increasing median house price to earnings ratio, currently 10.49, growing from 6.83 in 2012.

Local authority views

Permitted development was a policy which was viewed extremely negatively by the LPA in Crawley. There was a view that the particular context of Crawley as a place was leading to some of the issues with PD: being a New Town, there was a large number of post-war commercial buildings which were coming to the end of their useful life as commercial buildings. There were also relatively low land values compared to neighbouring towns, but a high affordable housing demand. This had apparently led to a number of large conversion schemes which were described as 'lower end', with whole schemes of studio and one-bed flats and very small space standards (with examples 16-20m^2 each). The size of units was a key residential quality concern from permitted development.

Some of these units are apparently not just small but poorly laid out, for example with dog-leg shapes, restricting the usability of space and daylight. Natural light was an issue seen in several schemes, with an example given of a proposed conversion where the only window would be a window within the front door facing out onto an undercroft car parking area whilst another had some units whose only windows were skylights. There was also often a lack of amenity space for residents.

A particular concern locally had been caused by a large conversion in the middle of the Manor Royal Industrial Estate, and there have been other schemes in inappropriate locations for residential uses. This reflects the spatial layout of Crawley as a New Town, where land uses are generally separated with residential development focussed within neighbourhoods. This means that offices which are located in employments areas and are converted are then isolated from the day-to-day services and facilities which are located in neighbourhood locations.

It is the quality of the residential units created that is at the heart of the Council's concerns about permitted development. In one example, there has been a spate of anti-social behaviour related issues from the tenants who have been housed in the scheme, including those with drug and alcohol dependency issues. This issue was felt to go back to housing quality concerns. Crawley Council had apparently been offered the opportunity to put temporary housing waiting list tenants in the conversion scheme and had refused because of the unacceptable quality and size of the units, but some London Boroughs had done just that. With small units, and no amenity space, there was a feeling this exacerbated people's feelings on unhappiness in the accommodation. A full planning permission permitted scheme would have had larger units, but also planning policy aims for mixed communities (for example developments with 40% affordable units and variety in unit sizes) which it was felt would then led to less concentrated issues.

There was an acknowledgement that there had been a supply of vacant office stock in Crawley, but it was felt that the policy approach would support redevelopment would have been more advantageous. Crawley have been exceeding their local plan requirement for housing delivery . It was also acknowledged there had been some higher quality permitted development schemes seen locally, for example one scheme where there was an associated planning permission to change the façade and build some additional space onto the existing office building, which then allowed the Council to get some CIL contributions and affordable housing contributions from the planning permission part of the scheme.

The concerns over the unsuitability of the Manor Royal area for residential use had led Crawley Council to adopt Article 4 Directions and work is underway to put some in for other industrial areas of the town. The Council chose not to impose immediate directions because of the risk of significant cost implications for the Council and it was felt, therefore, that the non-immediate nature of these did make it less than perfect as a planning tool because it was seen as equivalent to waving a flag to developers to make proposals in the year before it takes effect. This was partly driven by concerns amongst local Councillors that permitted development conversion in unsuitable locations could undermine the neighbourhood-focussed spatial character of this new town. The council is intending to make further Article 4 Directions to safeguard the economic function of several other designated Main Employment Areas. Members have taken an interest in Permitted Development.

The Council have adopted the Nationally Described Space Standards and have a local plan policy on amenity standards, supported by an SPD which covers design issues, space standards, amenity space and parking requirements. A town centre SPD also encourages residential development, and there have been a lot of planning applications for flatted developments in the town centre recently. These are apparently of notably better quality than permitted development conversions, meeting space standards, providing communal amenity areas and sometimes delivering the aim of 40% affordable units (albeit there have been viability issues around this on some schemes). These purpose-built developments usually also have a higher design quality with suitable external appearance. They are also in appropriate locations for residential development.

The permitted development conversions seen locally have been primarily office-to-residential, and those retail-to-residential schemes which have come for prior approval have tended to be only two or three units each. It is the scale of the office-to-residential schemes which amplifies concerns.

Schemes have tended to be delivered by SME type developers. There was a feeling that in some cases quality has got worse over time, for example some schemes have multiple prior approvals and these usually involve ever smaller units. In one example, two Housing Associations have apparently pulled out of deals with the developer as the quality of the proposed residential units was of such concern. The majority of implemented permitted development conversions locally have gone to the Private Rented Sector.

In terms of the handling of prior approvals, it was felt that having both ‘prior approval not required’ and ‘prior approval required and granted’ was confusing and over-complicated. The Council apparently do tend to get the information they are required to get to consider prior approvals, but the requirements are felt to be quite low. In particular, it was felt that although most developers voluntarily submit layout plans, the actual detail required here was too low.

Conditions are often used by the Council when granting prior approval, in particular cycle parking provision. They would use conditions to mitigate what they can consider through prior approval process, for example highways impacts. In the example of Maplehurst House, the scheme is in a flood zone and part of the mitigation strategy proposed by the developer was to have sleeping areas on a raised area, with staircases up to them, so a condition to require this actually to be implemented was added to the prior approval.

They have refused a number of prior approvals, particularly in relation to flooding issues (and the Council has had their refusals of three schemes on flood and noise grounds upheld at appeal). There have also been refusals for areas not in legitimate use as an office and on noise grounds. The Council have taken enforcement action in one case where a prior approval had been refused (albeit another one, covering some parts of the same building only was allowed). There can be some complexity between the interaction of multiple prior approvals and even full planning permissions on the same building.

Given that Building Regulation can be handled by approved inspectors who did not work for the Council, there was not much awareness around these issues. CIL payments are unusual on permitted development schemes because it is usually claimed the building was at least partially in use before the conversion.

There had been concerns regarding the conversion at Sutherland House, given its scale and some of the window arrangements for units. There have been concerns about the daylight and layout of units at Central House and the proposed scheme at Northgate House (which had windows facing a three storey brick wall from a distance of around one metre). There were also concerns about the two buildings converted in Broadfield Park, which is a business area, and some of the issues relating to the tenants of the building and anti-social behaviour had affected neighbouring offices still in commercial use.

Assessing quality: site visits

Table 22 presents a summary of the data collected on our site visits in Crawley. Key findings are that:

- In Crawley, the numbers of conversions and implementation rates were low. There were 17 buildings with office-to-residential prior approvals, 29% of which had been converted at the time of our site visits. There were no prior approvals in the other categories. In the same time period, Crawley saw 5 office-to-residential planning permissions and 3 retail/sui-generis ones, only one in each category had been implemented.
- Of those buildings where conversion had not started, they were more likely to have been fully occupied business premises if they had been granted prior approval rather than planning permission (see Figure 20).
- In Crawley, of the schemes that have been implemented, we were able to observe that larger schemes (30+ units) were coming through the prior approval route (and these were office-to-resi conversions) (see Figure 21).
- There are some differences noted between the **accessibility** of prior approval and planning permission schemes to the amenities of **local shops and services, public transport and local open or green space**. A greater percentage of schemes with planning permission were observed to be 'obviously accessible' to these amenities than schemes with prior approval (see Table 22).
- There were also some differences observed between prior approval and planning permission schemes in terms of provision of adequate facilities for waste refuse and mail delivery (see Table 22).

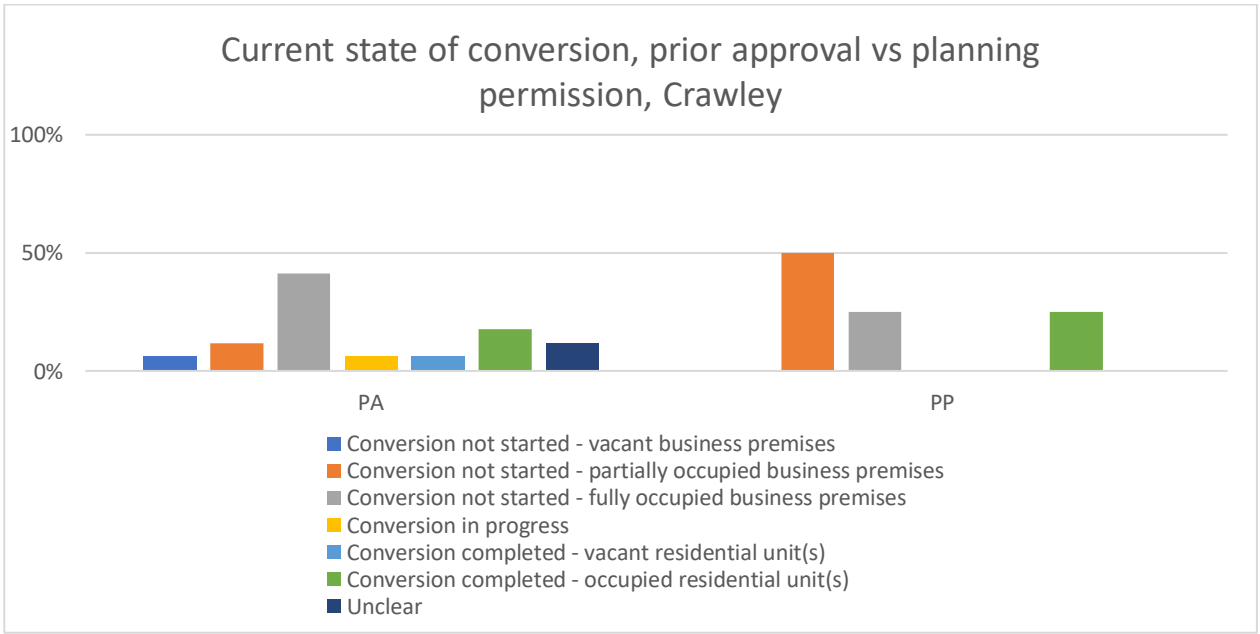

Figure 20: Current state of conversion: Prior approval vs planning permission, Crawley

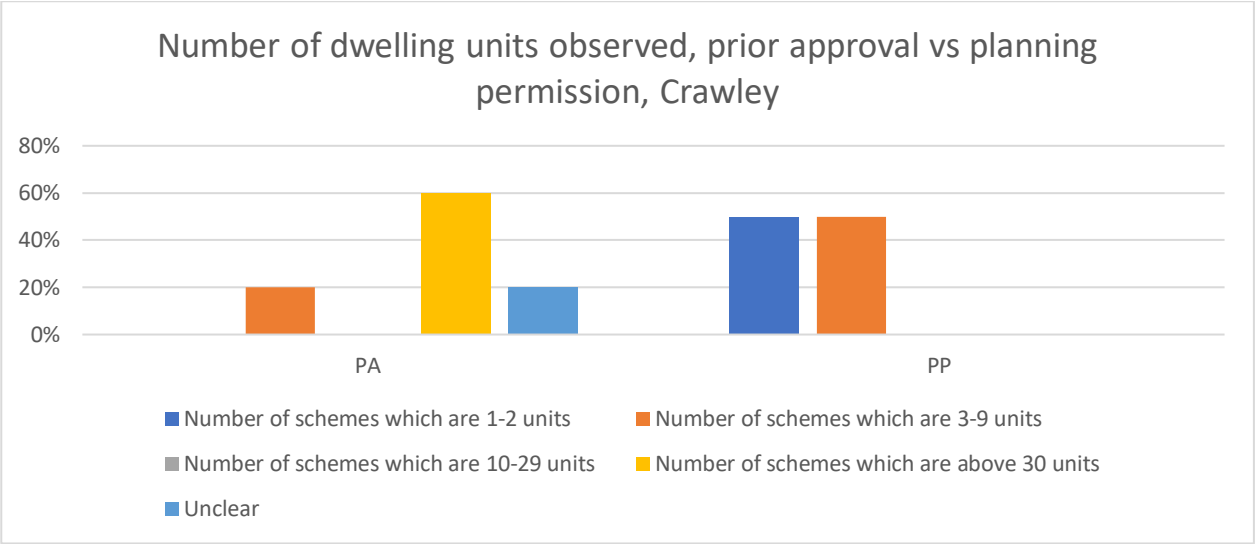

Figure 21: Number of dwelling units observed: Prior approval vs planning permission, Crawley

Table 22: Results of site visits in Crawley

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	17	0	0	**17**	5	3	0	**8**
Current state:								
Conversion not started - vacant business premises	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Conversion not started - partially occupied business premises	12%	N/A	N/A	**12%**	40%	67%	N/A	**50%**
Conversion not started - fully occupied business premises	41%	N/A	N/A	**41%**	40%	0%	N/A	**25%**
Conversion in progress	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Conversion completed - vacant residential unit(s)	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Conversion completed - occupied residential unit(s)	18%	N/A	N/A	**18%**	20%	33%	N/A	**25%**
Unclear	12%	N/A	N/A	**12%**	0%	0%	N/A	**0%**
Converted (total)	29%	N/A	N/A	**29%**	20%	33%	N/A	**25%**
Building original use:								
Residential single dwelling	18%	N/A	N/A	**18%**	40%	0%	N/A	**25%**
Residential apartment building	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Office building pre-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Office building 1950s-70s	12%	N/A	N/A	**12%**	60%	33%	N/A	**50%**
Office building 1980s-present	35%	N/A	N/A	**35%**	0%	0%	N/A	**0%**
Warehouse or light industrial building pre-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Warehouse or light industrial building post-WWII	18%	N/A	N/A	**18%**	0%	33%	N/A	**13%**
Light industrial ground floor / residential above	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Retail building pre-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Retail building post-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Retail ground floor / residential above	12%	N/A	N/A	**12%**	0%	33%	N/A	**13%**
Not answered	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Average building height (number of floors)	3.0	N/A	N/A	**3.0**	2.0	2.0	N/A	**2.0**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	0%	N/A	N/A	**0%**	100%	0%	N/A	**50%**
3-9 units	20%	N/A	N/A	**20%**	0%	100%	N/A	**50%**
10-29 units	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
30 units +	60%	N/A	N/A	**60%**	0%	0%	N/A	**0%**
Unclear	20%	N/A	N/A	**20%**	0%	0%	N/A	**0%**
If converted, obvious notable alterations made:								
New windows	100%	N/A	N/A	**100%**	100%	100%	N/A	**100%**
New doors	100%	N/A	N/A	**100%**	0%	100%	N/A	**50%**
Balconies added	20%	N/A	N/A	**20%**	0%	0%	N/A	**0%**
Site landscaping	20%	N/A	N/A	**20%**	0%	0%	N/A	**0%**
New cladding	80%	N/A	N/A	**80%**	0%	100%	N/A	**50%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Car parking	100%	N/A	N/A	**100%**	100%	100%	N/A	**100%**
Concierge	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Gym	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Roof terrace	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Private open space	20%	N/A	N/A	**20%**	0%	0%	N/A	**0%**
Public open space	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Adequate provision made for waste / refuse	80%	N/A	N/A	**80%**	100%	100%	N/A	**100%**
Adequate provision made for mail deliveries	80%	N/A	N/A	**80%**	100%	100%	N/A	**100%**
Building location:								
City or town centre mixed use	35%	N/A	N/A	**35%**	60%	67%	N/A	**63%**
Local high street mixed use	6%	N/A	N/A	**6%**	0%	33%	N/A	**13%**
Mostly commercial area	12%	N/A	N/A	**12%**	0%	0%	N/A	**0%**
Mostly industrial area	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Mostly residential area	35%	N/A	N/A	**35%**	40%	0%	N/A	**25%**
Isolated rural area	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Not answered	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Researchers impression on location:								
Obviously close to local shops and services	59%	N/A	N/A	**59%**	100%	100%	N/A	**100%**
Obviously accessible by public transport	82%	N/A	N/A	**82%**	100%	100%	N/A	**100%**
Obviously close to local open or green space	29%	N/A	N/A	**29%**	80%	67%	N/A	**75%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 10 implemented conversion schemes in Crawley are illustrated by Table 23, below.

Table 23: Results of desk based analysis for Crawley

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	8	0	0	**8**	1	1	0	**2**
Permission for change of use:								
Prior approval - one only	50%	N/A	N/A	**50%**	0%	0%	N/A	**0%**
Prior approval - multiple	25%	N/A	N/A	**25%**	0%	0%	N/A	**0%**
Planning permission - one only	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Planning permission - multiple	0%	N/A	N/A	**0%**	100%	0%	N/A	**50%**
Both prior approval and planning permission	25%	N/A	N/A	**25%**	0%	100%	N/A	**50%**
Prior approval with associated planning permission	63%	N/A	N/A	**63%**	N/A	N/A	N/A	**N/A**
Number of units created	620	N/A	N/A	**620**	1	10	N/A	**11**
Average number of units per scheme	77.5	N/A	N/A	**77.5**	1	10	N/A	**5.5**
Unit sizes:								
Studio flats	46%	N/A	N/A	**46%**	0%	50%	N/A	**45%**
One bedroom flats	20%	N/A	N/A	**20%**	0%	50%	N/A	**45%**
Two bedroom flats	34%	N/A	N/A	**34%**	100%	0%	N/A	**9%**
Three or more bedroom flats	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Maisonette or house	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Units complying with national space standards	9%	N/A	N/A	**9%**	100%	20%	N/A	**27%**
Units with access to private amenity space	2%	N/A	N/A	**2%**	100%	0%	N/A	**9%**
Buildings with access to communal amenity space	38%	N/A	N/A	**38%**	0%	0%	N/A	**0%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	1%	N/A	N/A	**1%**	0%	0%	N/A	**0%**
Only skylights or rooflights	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Only facing an atrium	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Single aspect	75%	N/A	N/A	**75%**	0%	90%	N/A	**82%**
Single aspect / north facing only	18%	N/A	N/A	**18%**	0%	0%	N/A	**0%**
Dual or triple aspect windows	25%	N/A	N/A	**25%**	100%	10%	N/A	**18%**
EPC rating:								
A	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
B	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
C	38%	N/A	N/A	**38%**	0%	0%	N/A	**0%**
D	0%	N/A	N/A	**0%**	0%	100%	N/A	**50%**
E	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
F	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
G	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Could not tell	37.5%	N/A	N/A	**37.5%**	100%	0%	N/A	**50%**
Council tax:								
A	50%	N/A	N/A	**50%**	0%	100%	N/A	**50%**
B	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
C	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
D	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
E	0%	N/A	N/A	**0%**	50%	0%	N/A	**0%**
F	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
G	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
H	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Could not tell	12.5%	N/A	N/A	**12.%**	100%	0%	N/A	**50%**
GIS Analysis:								
Average Index Multiple deprivation	4.30	N/A	N/A	**4.30**	3.00	4.00	N/A	**3.50**
Average Access to Public Green Space score	6.10	N/A	N/A	**6.10**	6.00	7.00	N/A	**6.50**
Walking distance to small supermarket	88%	N/A	N/A	**88%**	0%	100%	N/A	**50%**
Walking distance to large supermarket	88%	N/A	N/A	**88%**	0%	100%	N/A	**50%**
Walking distance to a bus stop	*Data not available*							
Walking distance to a rail station	88%	N/A	N/A	**88%**	100%	100%	N/A	**100%**

The desk based research is based on an analysis of the following prior approval schemes:

- *11 The Boulevard, Northgate, Crawley; 12 Broadwalk, Northgate, Crawley; 20 Springfield Road & 1a West Street, Southgate, Crawley; Central House, Brighton Road, Southgate, Crawley; Maplehurst*

House, Broadfield Park, Crawley; EDF Building, Russell Way, Three Bridges; Stoner House, Kilnmead, Northgate, Crawley; Sutherland House, Russell Way, Three Bridges

And the following planning permission schemes:

- *10 Ilfield Road, West Green, Crawley; 21 & 28 Broadwalk, Northgate, Crawley*

Crawley has had a number of large conversion schemes in terms of unit numbers, but fewer overall conversions in terms of the number of schemes than our other case studies and fewer of these permitted via a planning application route in particular. This means that for our planning application comparators, we were only able to consider two implemented schemes. In connection with one of these, although only 20% of the units complied with the current Nationally Described Space Standards, it is important to note that the units did all comply with then local guidance in place in 2015 in Crawley through a supplementary planning guidance as this gave the minimum size for a studio flat as 33m^2 (and this was considered in the officer report accompanying the planning permission). Both sites are also in the town centre, where more flexibility may be allowed for private amenity space.

The data in terms of the office-to-residential prior approvals, in particular, is still instructive though. Given the large number of units seen through these schemes in Crawley, it is particularly noteworthy that just 9% of the 620 units we considered created through this PDR met national space standards. This small size is compounded by just 2% having access to private amenity space, and 75% of the units having only single aspect windows.

We found nine units which, from the floorplans, did not appear to have any proper windows at all, being in Central House, Maplehurst House and Sutherland House. The four units in Central and Maplehurst Houses without windows did have exterior facing doors, and although not obvious from plans, we understand from our LPA interview that these may have small windows within them (although they would still offer very poor natural light and no sunlight at all given that they open onto undercroft parking areas). Another four units have very small windows compared to their size, and a contorted layout (with the windows being on long thin corridor-like sections of floorspace, away from the main living area) so the natural light is likely to be limited and poor. In Sutherland House, there has been a subsequent planning application to add some small mansard windows to the elevation, but it is difficult to tell if these match up to the five flats without windows or not (and even if they do, they would still provide poor natural light, be overlooked by flats in the neighbouring taller block from a distance of a few metres at most and be raised up so not readily accessible by residents). Another six units just seem to have skylights but these appear to be internal between the upper and lower floors of maisonettes.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 16m^2 in Central House and 16m^2 in Maplehurst House. The mean average of the smallest unit found in each prior approval scheme examined in Crawley was 28.5m^2. This is indicative of the very large stock of very small units which have been created through PD in Crawley, primarily from large scale office-to-residential conversion schemes. The smallest unit found in a planning permission scheme was the 33m^2 in 21 Broad Walk. This was commented upon in the officer report accompanying the planning permission and does actually comply with the local SPG then in force. The mean average of the smallest unit found in each planning permission scheme examined in Crawley was 60.7m^2.

Conclusions

The overall number of schemes converted in Crawley is quite small, with a lower implementation rate than a number of other case studies. Those buildings that have been converted, however, have tended to be very large office-to-residential conversions with very small unit sizes, little access to amenity space, and poor window arrangements / daylight. Many of the concerns locally have been about the tenants of a couple of large conversion schemes, and the social implications related to that, however this is linked back to the quality of the homes delivered.

Appendix 3: Case Study Three – Derby

Introduction and planning context

Derby is a city and unitary authority in the East Midlands. Classified as an 'Other Urban' authority, the city was originally one of the 'Five Boroughs' of the Danelaw. A traditional market and county town, considerable industrial revolution growth saw additional housing stock built. The city has long been associated with transport-related industrial activity.

The *Derby City Local Plan - Part 1 Core Strategy* was adopted in January 2017.[64] The plan notes that over the period 2011-2028, provision is made for a minimum of 11,000 new homes but that the projected population growth cannot all be accommodated within the administrative boundaries of the authority (with an objectively assessed need of 16,388 homes for the same period). The plan sets out some placemaking principles, but notes that an urban design guidance document will be produced to provide further information (although this is not yet adopted). Policy CP7 calls for the provision of a maximum of 30% affordable housing on residential developments of 15 or more dwellings. A public space standard calls for neighbourhood parks and children's play space to be within about 800m for residents.

A *Planning Obligations Supplementary Planning Document* was adopted in August 2018.[65] It explains that the Council has not adopted a CIL charging schedule due to viability concerns. Instead Section 106 contributions are sought to support the provision of affordable housing, education and community facilities, transport and highways infrastructure, drainage and flood defences, green space, sport and recreation facilities, public realm improvements and public art.

No Article 4 directions have been adopted in respect to changes of use to residential in Derby. Figure 22, below, is a map illustrating change of use schemes through both the PD and FPA routes in Derby, 2015-2018.

Local housing and real estate market

Derby is one of the key local markets in the East Midlands economy, and although it has an unemployment rate of 5% its job density sits higher than the national average, at 0.89. It does have moderate levels of deprivation compared to the other case studies, with 44.4% falling into the lowest three deciles as measured by the index of multiple deprivation. The local housing market has seen some steady growth in the last decade, and although house prices have increased by 20.9%, the house price to earnings ratio is the lowest across our case studies at 4.81, which in theory makes it the most affordable. New office supply has been limited in recent years, and the market is reasonably popular with both investors and occupiers, and is a very affordable market with lower rental values (office market rental growth has been negative at -1.4% in the last twelve months). However, by contrast, the retail market has a very low vacancy rate at 1.8% and has seen rents grow by 1.2% in the last year.

[64] 'Derby City Local Plan – Part 1' at https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/policiesandguidance/planning/Core%20Strategy_ADOPTED_DEC%202016_V3_WEB.pdf

[65] 'Planning Obligations Supplementary Planning Document' at https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/policiesandguidance/planning/Final%20version%20of%20Adopted%20SPD2018.pdf

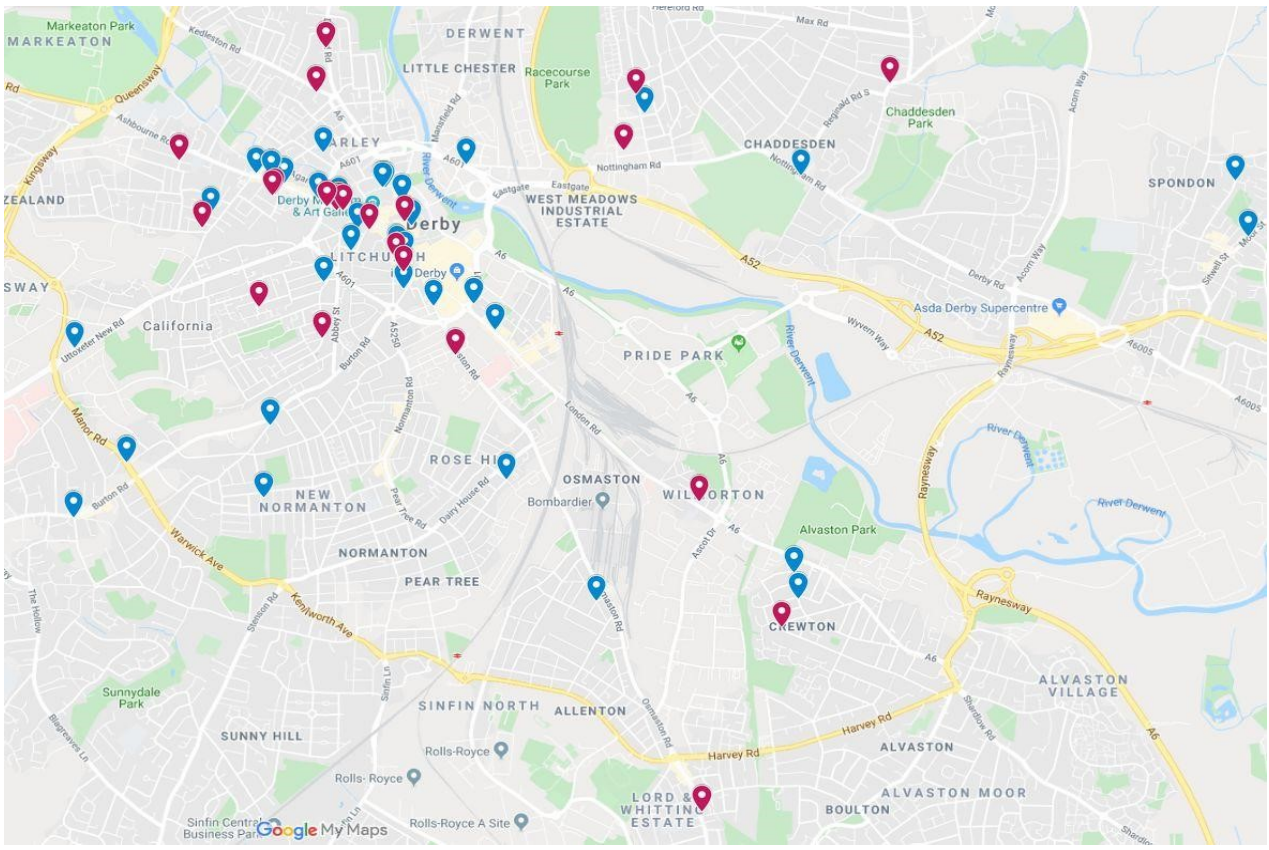

Figure 22: Map illustrating change of use schemes through both the PD and FPA routes in Derby, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local authority views

From the perspective of the local authority in Derby, the key impacts of the extended PDR regime were predominantly disadvantageous, even though the prior approvals have contributed towards providing housing. Derby has a city centre master plan with a target of 2000 houses in the city centre, and PDR has clearly impacted this provision. However, as with other local authorities' concerns were raised over the nature and quality of the spaces created, which is only meeting a particular need; one which positively impacts housing targets, but also fails to contribute to necessary amenities or infrastructure. The extension of PDR has also introduced challenges for the local authority and the general public, with the former under significant pressure to work through applications with limited resources coupled with diminished financial income from fees, and the latter often confused as to how planning processes work.

Planning is often seen as something of a scapegoat for the lack of housing provision due to misunderstandings about the complexities of the system, a system which is becoming increasingly convoluted due to the extension to PDR. It was recognised, however, that developers are actively operationalising the PDR changes, maximising opportunities for increasing profits but with little regard for the future occupants. The consequences of PDR in Derby are multifaceted and interconnected, reflective of wider regulatory and economic influences, with negative impacts exacerbated as a result of a short-term approach becoming a permanent characteristic of the system.

Conversions through PDR in Derby have been mostly office or retail to residential, rather than industrial or storage. The office market in Derby changed in the 1990s and 2000s as occupiers and firms relocated from the city centre to more peripheral locations with newer office space, such as Pride Park. This has led to increased vacancies and even though the local authority wants to see businesses and economic activity in the city centre to revitalise the market, challenges with office space in the city centre have been amplified by the PDR regime as space is lost to residential, rather

than redesigned to attract office occupiers once more. The authority has been trying to increase the quality of offices offered in the city centre, with limited success, although some occupiers are returning to refurbished listed buildings. Examples reflected on included a new build grade A / prime office development in the city centre which faced problems with letting in what is also a weak market, and is now being used by the university, and a renovated 60s office space which was converted to student accommodation. There are clear challenges in providing a well-balanced, attractive city centre which is both sustainable and diverse, and also meets needs across occupier markets.

Although PDR and the loss of office space in the city centre is of concern, it isn't seen by the local authority as sufficient basis for an Article 4 direction, as the office market is weak and doesn't need to be protected for employment purposes. There are greater priorities for Derby – such as conservation. Other influential factors are that PDR impacts are seen as more manageable, there is very little media coverage of these changes and there isn't a political drive for an Article 4 in relation to the loss of office space.

Pursuing an Article 4 in relation to the loss of office space may not be a current priority for the local authority, but they do have significant concerns over the types of conversions being created by PDR. Retail to residential units tend to have a larger floorspace, whereas the office to residential units are of higher density (one to two units), they have smaller floorplates and are generally low quality. A number of these conversions have been in areas of the city with bars and nightclubs, and there have been conflicts emerging over noise and disturbances. Derby is currently adopting national space standards through their recent local plan, along with a design code and guide, but enforcing these is difficult due to resourcing.

The lack of quality and space standards in the PDR assessment regime mean that developers (mostly small-scale and local) can maximise profits through the creation of smaller spaces more cost effectively for them without S106 contributions, which actively contributes towards squeezing as many units as possible into PDR developments (there is no CIL in Derby). Many of those operationalising the conversions to residential are seen as higher-risk developers, willing to take a chance in pursuit of maximum profits, and with little longer-term connection to the future of the building. The government's approach is perceived to contain inconsistency between wanting higher quality design and living environments, but then allowing PDR to introduce poorer design and less sustainable homes.

The local authority also loses out on fees: one of the larger Derby PDR applications at a cost of £160, would have brought in £37,000 through planning application fees. PDR is seen as a quicker way through the planning system for developers and applicants, but one which is to the detriment of the end user in terms of design, quality and amenity, and it also creates a substantial amount of work for the local authority. Processing PDR is often difficult due to lack of information and restrictive timescales, whilst refusing PDR is also difficult, although some schemes have been rejected on the basis of flood risk and noise.

Overall, the PDR regime is seen by the local authority as a backward move which almost negates the purpose of planning due to the lack of control they have over outcomes for both the residential units created and the additional issues around S106 contributions and amenities. Although deregulation has been driving towards making the planning system more transparent PDR adds another level of confusion for members of the public to understand, introducing added complexities which contradict the public's flexible perception of planning, as well as additional processing issues for the local authority. PDR is seen to facilitate the wrong developments at the wrong time, from a short-term perspective, one which in 20 years' time could be seen as highly problematic for Derby. The view was that PDR create systemic complexities, with limited positive impact on the local housing market.

Assessing quality: site visits

Table 24 presents a summary of the data collected on our site visits in Derby. Key findings are that:

- In Derby, there were 21 office-to-residential and 3 retail/sui-generis-to-residential conversions through prior approval. There were none in the light industrial category. We also visited 18 office-to-resi and 13 retail/sui-generis-to-resi and 2 industrial-to-resi conversions through planning permission. 58% of the prior approval schemes had been implemented at the time of the site visit, compared to 76% of conversions through planning permission.
- Planning permission schemes were more likely to have notable alterations, particularly new doors, landscaping, new cladding (see Figure 23).
- Some differences in quality between planning permission and prior approval schemes were observed, although given the small numbers of schemes converted overall, it is difficult to draw concrete conclusions from these findings.
- Planning permission schemes were more likely to have adequate provision for waste/refuse (52%) and mail deliveries (88%), compared to prior approval schemes, where only 43% had adequate provision for waste/refuse and 64% for mail deliveries (Table 24).
- Planning permission schemes were not more likely to be obviously close to public transport, or shops and services, but they were more likely to be close to green space (79% v 71%) (Table 24).

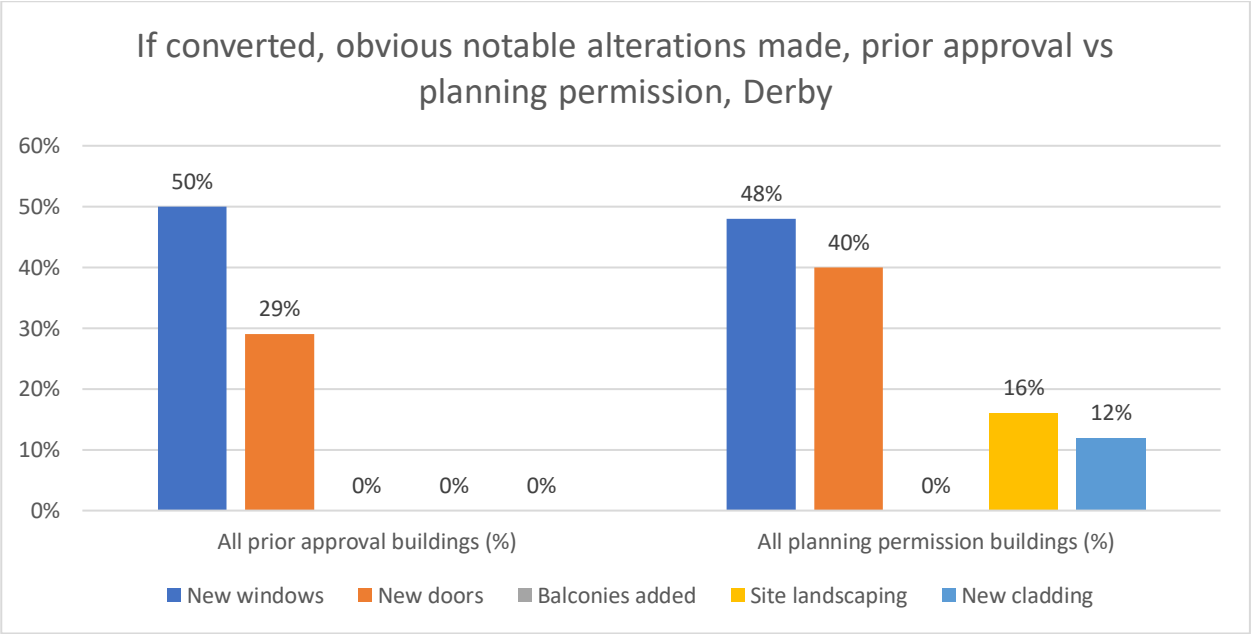

Figure 23: Notable alterations made, prior approval vs planning permission, Derby

Table 24: Results of site visits in Derby

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	21	3	0	**24**	19	13	2	**34**
Current state:								
Conversion not started - vacant business premises	10%	0%	N/A	**8%**	5%	15%	0%	**9%**
Conversion not started - partially occupied business premises	5%	0%	N/A	**4%**	0%	0%	0%	**0%**
Conversion not started - fully occupied business premises	14%	0%	N/A	**13%**	11%	15%	0%	**12%**
Conversion in progress	10%	0%	N/A	**8%**	11%	15%	0%	**12%**
Conversion completed - vacant residential unit(s)	0%	33%	N/A	**4%**	5%	23%	0%	**12%**
Conversion completed - occupied residential unit(s)	43%	67%	N/A	**46%**	58%	31%	100%	**50%**
Unclear	19%	0%	N/A	**17%**	11%	0%	0%	**6%**
Converted (total)	52%	100%	N/A	**58%**	74%	69%	100%	**74%**
Building original use:								
Residential single dwelling	19%	0%	N/A	**17%**	37%	0%	0%	**21%**
Residential apartment building	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Office building pre-WWII	5%	0%	N/A	**4%**	21%	0%	0%	**12%**
Office building 1950s-70s	10%	0%	N/A	**8%**	5%	0%	0%	**3%**
Office building 1980s-present	29%	0%	N/A	**25%**	16%	0%	0%	**9%**
Warehouse or light industrial building pre-WWII	10%	0%	N/A	**8%**	5%	8%	0%	**6%**
Warehouse or light industrial building post-WWII	5%	0%	N/A	**4%**	0%	0%	0%	**0%**
Light industrial ground floor / residential above	0%	0%	N/A	**0%**	0%	0%	100%	**6%**
Retail building pre-WWII	5%	33%	N/A	**8%**	11%	23%	0%	**15%**
Retail building post-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Retail ground floor / residential above	19%	67%	N/A	**25%**	5%	62%	0%	**26%**
Unclear	0%	0%	N/A	**0%**	0%	8%	0%	**3%**
Average building height (number of floors)	2.7	1.8	N/A	**2.5**	2.4	2.7	2.5	**2.5**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
Number of schemes 1-2 units	36%	100%	N/A	**50%**	36%	33%	50%	**36%**
Number of schemes 3-9 units	9%	0%	N/A	**7%**	21%	33%	0%	**24%**
Number of schemes 10-29 units	0%	0%	N/A	**0%**	21%	33%	0%	**24%**
Number of schemes above 30 units	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Unclear	55%	0%	N/A	**43%**	21%	0%	50%	**16%**
If converted, obvious notable alterations made:								
New windows	36%	100%	N/A	**50%**	21%	100%	0%	**48%**
New doors	18%	67%	N/A	**29%**	14%	89%	0%	**40%**
Balconies added	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Site landscaping	0%	0%	N/A	**0%**	0%	44%	0%	**16%**
New cladding	0%	0%	N/A	**0%**	0%	33%	0%	**12%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Car parking	18%	0%	N/A	**14%**	21%	33%	0%	**24%**
Concierge	9%	0%	N/A	**7%**	0%	0%	0%	**0%**
Gym	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Roof terrace	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Private open space	9%	0%	N/A	**7%**	0%	44%	0%	**16%**
Public open space	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Adequate provision made for waste / refuse	55%	0%	N/A	**43%**	57%	56%	0%	**52%**
Adequate provision made for mail deliveries	55%	100%	N/A	**64%**	79%	100%	100%	**88%**
Building location:								
City or town centre mixed use	52%	0%	N/A	**46%**	53%	38%	50%	**47%**
Local high street mixed use	10%	0%	N/A	**8%**	11%	15%	0%	**12%**
Mostly commercial area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Mostly industrial area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Mostly residential area	29%	100%	N/A	**38%**	37%	46%	50%	**41%**
Isolated rural area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Not answered	10%	0%	N/A	**8%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	86%	100%	N/A	**88%**	84%	77%	100%	**82%**
Obviously accessible by public transport	90%	100%	N/A	**92%**	89%	92%	100%	**91%**
Obviously close to local open or green space	67%	100%	N/A	**71%**	84%	62%	0%	**71%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 25 implemented conversion schemes in Derby are illustrated by Table 25, below.

Table 25: Results of desk based analysis for Derby

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	7	3	0	**10**	7	6	2	**15**
Permission for change of use:								
Prior approval - one only	14%	100%	N/A	**40%**	0%	0%	0%	**0%**
Prior approval - multiple	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Planning permission - one only	0%	0%	N/A	**0%**	14%	83%	100%	**53%**
Planning permission - multiple	0%	0%	N/A	**0%**	86%	17%	0%	**47%**
Both prior approval and planning permission	86%	0%	N/A	**60%**	0%	0%	0%	**0%**
Prior approval with associated planning permission	71%	0%	N/A	**50%**	N/A	N/A	N/A	**N/A**
Number of units created	338	3	N/A	**341**	42	8	3	**53**
Average number of units per scheme	48.29	1	N/A	**34.1**	6	1.33	1.5	**3.53**
Unit sizes:								
Studio flats	37%	33%	N/A	**37%**	43%	0%	0%	**34%**
One bedroom flats	10%	33%	N/A	**10%**	10%	50%	100%	**21%**
Two bedroom flats	53%	33%	N/A	**52%**	38%	25%	0%	**34%**
Three or more bedroom flats	0%	33%	N/A	**0%**	7%	13%	0%	**8%**
Maisonette or house	7%	67%	N/A	**7%**	2%	13%	0%	**4%**
Units complying with national space standards	3%	33%	N/A	**3%**	33%	25%	33%	**32%**
Units with access to private amenity space	0%	33%	N/A	**1%**	24%	13%	0%	**21%**
Buildings with access to communal amenity space	14%	33%	N/A	**20%**	29%	17%	50%	**27%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Only skylights or rooflights	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Only facing an atrium	0%	0%	N/A	**0%**	10%	13%	33%	**11%**
Single aspect	81%	33%	N/A	**81%**	52%	13%	67%	**47%**
Single aspect / north facing only	10%	0%	N/A	**10%**	33%	13%	0%	**28%**
Dual or triple aspect windows	19%	67%	N/A	**19%**	48%	63%	33%	**49%**
EPC rating:								
A	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
B	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
C	14%	33%	N/A	**20%**	0%	17%	0%	**7%**
D	14%	0%	N/A	**10%**	29%	33%	0%	**27%**
E	0%	33%	N/A	**10%**	0%	0%	0%	**0%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Could not tell	71.4%	33.3%	N/A	**60%**	71.4%	50%	100%	**66.7%**
Council tax:								
A	0%	67%	N/A	**20%**	14%	33%	0%	**20%**
B	14%	0%	N/A	**10%**	0%	17%	0%	**7%**
C	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
D	0%	0%	N/A	**0%**	14%	0%	0%	**7%**
E	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
H	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Could not tell	85.7%	33.3%	N/A	**60%**	71.4%	50%	100%	**66.7%**
GIS Analysis:								
Average Index Multiple deprivation	2.80	2.80	N/A	**2.80**	1.50	3.00	2.00	**2.17**
Average Access to Public Green Space score	3.40	2.90	N/A	**3.25**	3.00	3.40	3.00	**3.16**
Walking distance to small supermarket	100%	67%	N/A	**90%**	100%	100%	100%	**100%**
Walking distance to large supermarket	57%	33%	N/A	**50%**	71%	67%	50%	**67%**
Walking distance to a bus stop	100%	67%	N/A	**90%**	100%	100%	100%	**100%**
Walking distance to a rail station	0%	0%	N/A	**0%**	0%	17%	0%	**7%**

The desk based research is based on an analysis of the following prior approval schemes:

- *1 Pittar Street, Derby; 3 Surrey Street, Derby; 474 Baker Street, Derby; Burdett House, Becket Street, Derby; Celtic House, Friary Street, Derby; Eastmead, Duffield Road, Derby; Former Quarndon*

Electronics, Slack Lane, Derby; St Peter's House, Gower Street, Derby; Wilmot House, Friar Gate, Derby

And the following planning permission schemes:

- *13-19 Chatsworth Street, Derby; 158 Chaddesden Park Road, Derby; 22-22a Wild Street, Derby; 3 St Mary's Gate, Derby; 30-31 Friar Gate, Derby; 30a Green Lane, Derby; 34 Green Lane, Derby; 35-36 St Mary's gate., Derby; 38 Moore Street, Derby; 40 St Mary's Gate, Derby; 58 Friar Gate, Derby; 62-64 Osmaston Road, Derby; 63-64 Friar Gate, Derby; 92-94 Chapel Lane, Derby; Joseph Wright House, Iron Gate, Derby*

Derby has seen sufficient planning application change of use conversions to offer a more meaningful local comparison between permitted development and planning application governed schemes, albeit the prior approval schemes have tended to be much larger in terms of the number of units being created. The data show some similarity between schemes from both routes in terms of the number of bedrooms, EPC ratings, location in terms of access to green space and what we could find out about current type of residential use. The space standards are quite different. Although only 32% of the planning permission units met Nationally Described Space Standards, a significantly lower 3% of PD units met this standard. Similarly with access to private amenity space, only 27% of planning permission units had this, but an even lower 1% of PD units had access. The number of units with dual aspect window arrangements was also noticeably lower for PD units (at 19%) than planning permission units (49%).

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was $10m^2$ in Roman House. The mean average of the smallest unit found in each prior approval scheme examined in Derby was $44.4m^2$. The smallest unit found in a planning permission scheme was the $21m^2$ studio flat seen in Joseph Wright House. No officer report is available publicly for this FPA; however it is a Grade II listed building, which may have limited the ability or consent to make changes to the building to accommodate a larger unit. The mean average of the smallest unit found in each planning permission scheme examined in Derby was $97.2m^2$.

Conclusions

There is a high implementation rate for change of use planning permission schemes in Derby, and a reasonable number of schemes have been seen through both routes, albeit these tend to be through planning permission. The extremely low rates of compliance with national space standards in the PD route, combined with a lack of access to amenity space and frequent poor window arrangement do suggest a quantum of poor quality conversions. However, the planning permission units do not have a particularly high compliance with national space standards either (albeit significantly higher, still a minority). As the national space standards become more enshrined, adherence to these for planning permission schemes may rise, but it is only one facet in often competing planning considerations which are weighed-up by officers when making decisions on applications.

Appendix 4: Case Study Four – Enfield

Introduction and planning context

Enfield is a London Borough. It is an outer London borough, in the north of Greater London. There are a number of areas of industrial land to the east of the borough, with more prosperous suburban housing towards the west. It is classified as a 'major urban' authority.

As part of Greater London, Enfield is covered by the policies of the *London Plan*. At the time of writing, the *London Plan* adopted in March 2016 is the current plan.[66] The plan notes the desperate need for more homes in London, with a projection for 40,000 new homes per annum 2011-2036. There is a desire for homes which meet a range of needs, of high design quality and supported by essential social infrastructure for a good quality of life. The plan assigns an annual housing supply monitoring target for Enfield of 798 homes 2015-25.

The *London Plan* includes policy 3.5 on the 'quality and design of housing developments', which seeks to ensure that housing is "of the highest quality internally, externally and in relation to their context and to the wider environment" and that "the design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people".[67] Minimum space standards are introduced and policy 3.6 deals with children and young people's play and informal recreation facilities. The plan also commits the Greater London Authority to monitor the impacts of permitted development rights for change of use to residential alongside boroughs.

A new London Plan was examined in early 2019 and, following the examination, a July 2019 draft has been published.[68] This new plan suggests London needs 66,000 new homes each year, of which 43,000 should be genuinely affordable. A strategic target of 50% of all new homes being genuinely affordable is established. It is argued that London must seek to deliver new homes through a wide range of development options. A design-led approach is promoted and policy D4 is on 'housing quality and standards'. Dual aspect dwellings are preferred, with adequate daylight and storage space, with minimum internal space standards and private outdoor space. Play space provision and accessibility are also discussed. Encouragement is given to boroughs to introduce Article 4 Directions where appropriate.

The Greater London Authority (GLA) have also prepared and adopted a wide range of supplementary planning guidance. Most notably, there is the March 2016 *Housing Supplementary Planning Guidance* (updated August 2017).[69] This places a strong emphasis on seeking the highest housing quality, not just for new builds but also for change of use and conversion schemes.

The *Enfield Plan Core Strategy 2010-2025* was adopted in November 2010.[70] A requirement for 560 dwellings per year was envisaged, with particular growth around the Meridian Water Opportunity Area. The core strategy includes a policy to achieve a borough-wide target of 40% affordable housing units in new developments on sites capable of accommodating ten or more dwellings. The plans

[66] 'The London Plan' at https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf
[67] Ibid page 102
[68] https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-london-plan-consolidated-suggested-changes-version-july-2019
[69] 'Housing Supplementary Planning Guidance' at https://www.london.gov.uk/sites/default/files/housing_spg_revised.pdf
[70] 'The Enfield Plan' at https://new.enfield.gov.uk/services/planning/local-plan/planning-policy-information-enfield-core-strategy.pdf

calls for high quality, sustainable homes with a good mix of types and sizes of units. Work on a new local plan is currently ongoing.[71]

A *Section 106 Supplementary Planning Document* was adopted in November 2016.[72] This places seeking contributions for affordable housing as the highest priority, followed by transport, education, public realm, employment skills, flooding and climate change, open space, healthcare, community facilities, built heritage and biodiversity. Alongside this, a CIL schedule was adopted in April 2016.[73]

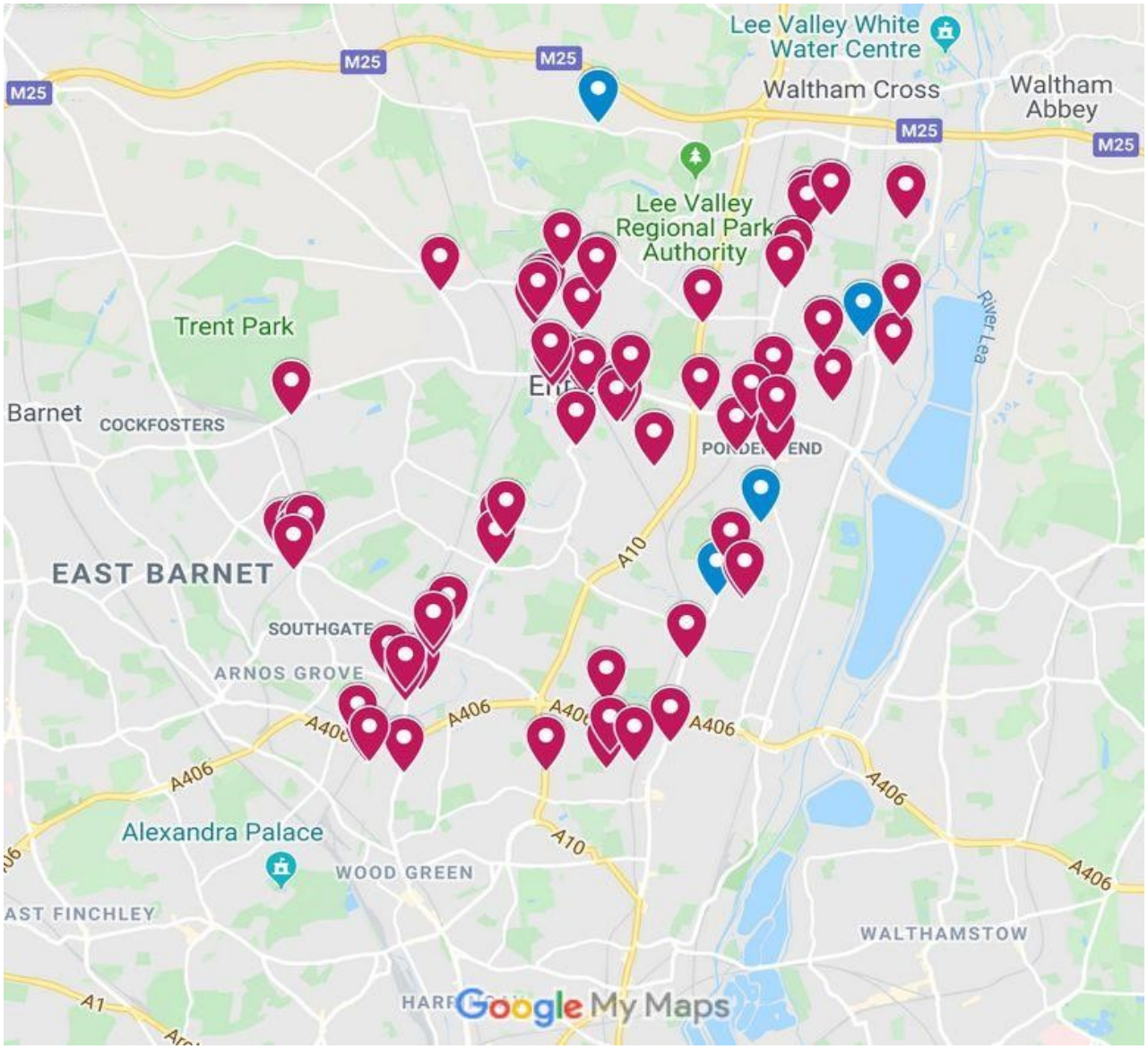

Figure 24: Map illustrating change of use schemes through both the PD and FPA routes in Enfield, 2015-2018 (Source: UCL research team, on a Google Maps base map)

There are currently no Article 4 directions in relation to changes of use to residential in Enfield. The Council are, however, currently conducting research to consider an Article 4 Direction to restrict

[71] 'A new local plan for Enfield' at https://new.enfield.gov.uk/services/planning/local-plan/
[72] 'Section 106 Supplementary Planning Document' at https://new.enfield.gov.uk/services/planning/s106-supplementary-planning-planning.pdf
[73] 'Community Infrastructure Levy Charging Schedule' at https://new.enfield.gov.uk/services/planning/community-infrastructure-levy/planning-policy-information-community-infrastructure-levy-charging-schedule.pdf

office to residential conversions in certain parts of the borough. Figure 24, above, is a map illustrating change of use schemes through both the PD and FPA routes in Enfield, 2015-2018.

Local housing and real estate market

In Enfield, local economic indicators are not particularly encouraging, with high unemployment rates at 5.3% in a market where only 47.9% of the population economically active, and job density sits at the lowest across all case studies, at 0.59. Also, 47.6% of the population in the local authority fall into the lowest three deciles of the multiple deprivation index. Housing prices have decreased slightly in the last year, but have increased by 35.6% overall in a decade, therefore the house price to earnings ratio has risen by 50% from 8.26 to 12.25 making home ownership less accessible. For London, Enfield is one of the smaller office markets with 2.5 million square foot of space, and no new supply coming onto the market this year. Therefore, vacancy rates are low at 1.7%, however rental growth is negative at -1.0%. The retail market also has a very low vacancy rate at 1.5%, but has seen annual rental growth of 2.8%.

Local authority views

Officers explained there was a general perception by the public and some councillors in Enfield that the number of permitted development schemes they had seen was quite high, and thata number of these schemes had caused concern in terms of residential quality, in particular internal space standards of units but also the suitability of the environment for residential units, and the Council could do little to influence design quality concerns on prior approvals. It was acknowledged that some schemes had been of higher quality, but this was entirely down to the whim of the developer. Concerns about housing quality in the private rented sector were leading to work on the Council introducing a selective licensing scheme for landlords locally.

It was suggested that there could be a relationship between the quality of permitted development schemes and the geography of the borough, with the eastern part of the borough having lower land values and a large amount of industrial land. In this area, there have been a number of schemes which suffer from poor residential quality (for example, a scheme with the only daylight to units coming through rooflights) and in unsuitable locations (for example, a scheme in an industrial estate with poor accessibility). It was also on the Bull Lane Industrial Estate that the council had taken enforcement action in relation to one light industrial-to-residential permitted development scheme. In the west of the borough, schemes are more typically office-to-residential schemes where an isolated office block in local town centres such as Palmer's Green, Oakwood or Cockfosters might be vacant and then come forward for conversion.

Retail-to-residential schemes were not as much of an issue as office-to-residential and light industrial-to-residential schemes locally. These retail conversions have mainly been seen in secondary shopping parades which are already in suburban housing locations. The principle of converting such units was not generally a concern, more just the detail of the design of the change of use (for example around refuse storage and shop front appearance). That said, there was some recognition that depending on the location of units there could be the potential undermine a parade of shops if a couple of the middle units were converted to residential use rather than the end units.

It was felt that there could be cumulative impacts from having people in various permitted development schemes which were not providing the right type, quality or location of accommodation compared to their needs. This was felt to then lead to longer-term place-making concerns.

There was an acknowledgement that the borough had often struggled to meet its housing targets, with a particular implementation gap in relation to granted planning permissions. Permitted development schemes had therefore (in recent years) helped the Council to meet its housing supply. The planning officers interviewed also felt there must be some demand given that converted permitted development schemes are usually occupied fairly quickly and can be slightly more

affordable than new build developments. Permitted development conversions would also tend to be implemented faster than planning permission schemes.

Local members are concerned about permitted development and the ability to control residential quality and design and so have been supportive of an Article 4 direction, which they authority are currently investigating as to whether there is a justification for one. A concern was that permitted development was drawing down housing quality more generally locally by skewing the local market. The Council had tried for exemption in 2013 but been turned down and are now carefully assessing the evidence to build a suitable case to justify an Article 4 Directions. Another concern for Councillors is affordable housing contributions, and it was felt permitted development was often used as a negotiating tool by developers to avoid such contributions. There had actually been an overall drop in Section 106 contributions after permitted development was introduced. Local residents have been concerned about residential amenity issues in relation to the Refuge House scheme and have been lobbying local councillors about these concerns.

There are policies in the existing development management DPD in relation to wanting dual aspect residential units and around internal space standards. Work on a new local plan is ongoing and the Nationally Described Space Standards are being considered. There is a view that more robust policies on design quality and standards will be needed in future as the borough densifies. There is a desire to bring forward a Enfield residential design SPD but resourcing constraints within the planning department is inhibiting production.. The current approach will therefore be to work on a design guide for the Meridian Water area (where comprehensive redevelopment is expected) and then use that as a case study to test potential borough-wide policies. There will also be some area-based policies in the new local plan which relate to place-based design policies.

No one developer stood out, as they tend to be more SME type organisations. Implemented permitted development schemes apparently often went to either PRS or temporary housing. It was apparently not uncommon for a larger office-to-residential conversion scheme developer to approach the council and suggest they use the units for temporary housing accommodation.

It was fairly uncommon before permitted development to have office-to-residential conversions, apparently, but there were some examples (such as the old British Gas offices at Green Tower) and there was a supportive policy for change of use in the old Unitary Development Plan for the borough.

Most permitted development schemes locally do not have any associated planning permissions, particularly the smaller ones, but there have been a few cases where a permission has been sought to enhance the external appearance of the building.

The issue of how to handle prior approvals has been debated locally, and they have changed between using ‘prior approval not required’ and ‘prior approval required and granted’ and there have been internal debates amongst planning officers about how these should be rationalised. There have been quite a few prior approvals where there has been insufficient information in relation to flooding and/or highways.

There was initially an understanding that conditions could not be applied to prior approvals, but the Council have started doing this over the last 12 months. There has been discussion about whether they could require a unilateral undertaking in relation to one scheme. In most cases, a CIL contribution could not be obtained due to the building being at least partially occupied prior to conversion.

It was not common to refuse prior approvals in Enfield, but there had been some where there has been highways related issues which led to refusal. There had also been some schemes where the ‘office’ had not actually been in office use when the prior approval was submitted, also leading to refusal.

There were no schemes which had come to the notice of the planners interviewed in relation to Building Control issues. There had, however, been some enforcement action taken in relation to

permitted development conversions and a joined-up approach is taken to these pulling together planning, housing and environmental health enforcement.

Assessing quality: site visits

Table 26 presents a summary of the data collected on our site visits in Enfield. Key findings are that:

- In Enfield, there were 68 prior approval conversions (39 office-to-resi, 24 retail/sui-generis, 5 light industrial), but only 5 conversions through planning permission (1 office-to-residential, 3 retail/sui-generis, 1 light industrial). A statistical comparison between prior approval and planning permission schemes would therefore be difficult to draw any robust conclusions from.
- 57% of the prior approval schemes in Enfield had been converted, relatively balanced between the three categories.
- Where conversion had not started, 28% office-to-resi and 33% retail/sui generis-to-resi prior approvals were either partially or fully occupied, 20% of light industrial-to-resi prior approvals were partially occupied, none were observed to be fully occupied.
- Converted prior approval schemes in Enfield tended to be small. 74% of office-to-resi schemes had under 10 dwelling units, the rest were unclear. There were no observed office-to-resi prior approval conversions over 10 units. For retail-to-resi this was even more the case. 54% were 1-2 units only, 8% were 3-9 units. None were larger.
- The majority of prior approval schemes were located in mixed use town centre/local high street, or residential areas. There is some variation between the different categories illustrated in Figure 25.
- 2 (5%) office-to-resi and 1 (20%) industrial-to-resi prior approval conversions were observed to be of 'notable poor quality'. 1 of the retail-to-resi conversions through planning permission was also deemed to be of 'notable poor quality'. It is difficult to draw any concrete conclusions from these, as statistics, but it does suggest that there are some enforcement issues through planning.
- Although the small numbers of planning permission schemes in Enfield make it hard to draw conclusions from the comparison, planning permission schemes appear to be securing more external alterations enhancing the quality of the scheme, particularly new windows, doors and site landscaping (see Figure 26).

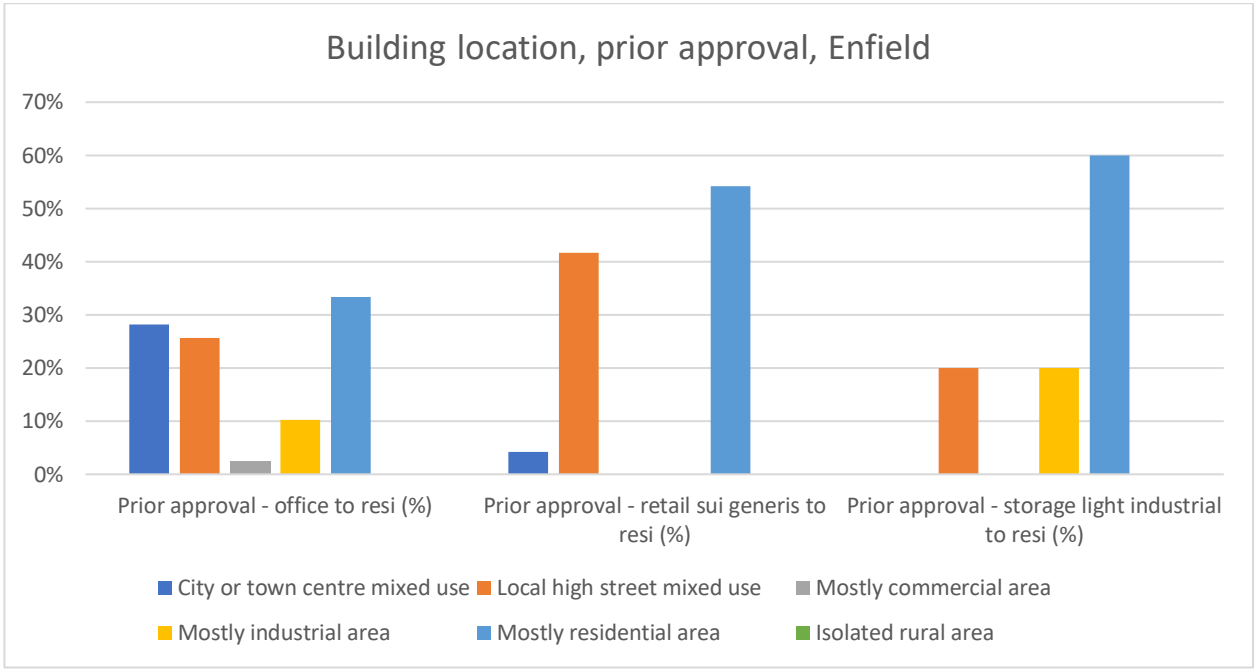

Figure 25: Building location, prior approval schemes, Enfield

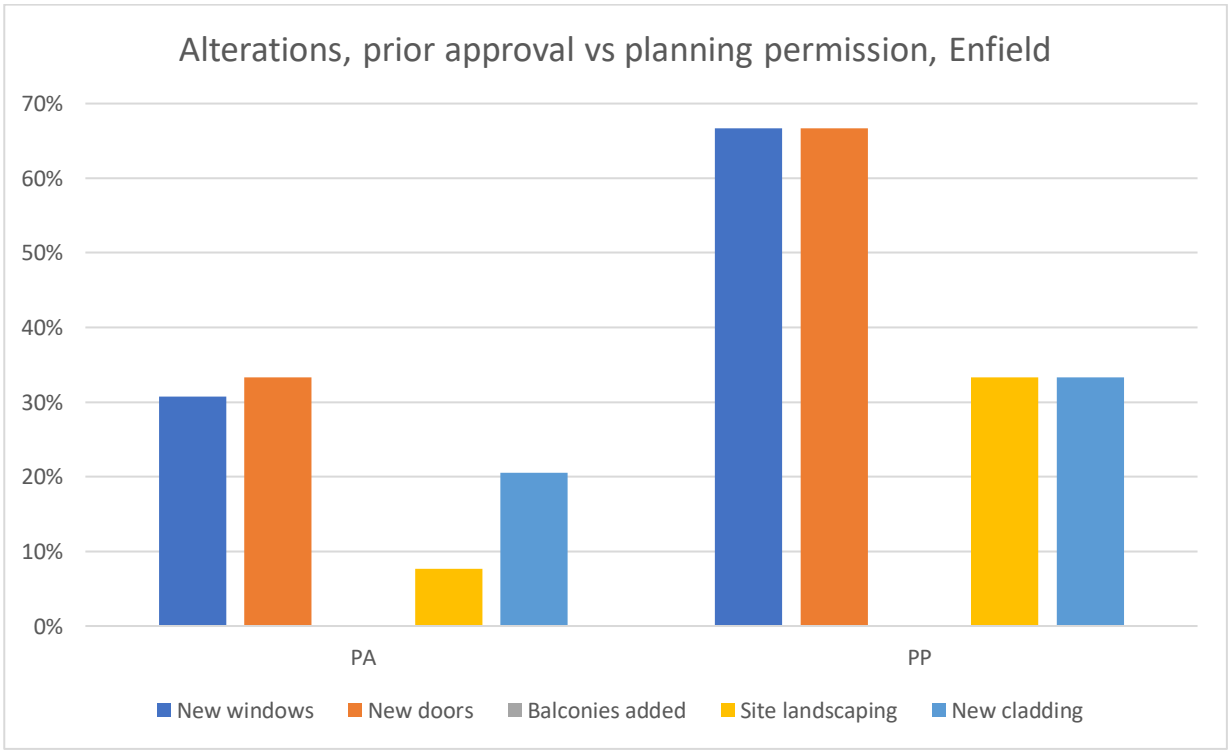

Figure 26: Notable alterations, prior approval vs planning permission, Enfield

Table 26: Results of site visits in Enfield

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	39	24	5	**68**	1	3	1	**5**
Current state:								
Conversion not started - vacant business premises	5%	13%	20%	**9%**	0%	0%	0%	**0%**
Conversion not started - partially occupied business premises	13%	4%	20%	**10%**	100%	0%	0%	**20%**
Conversion not started - fully occupied business premises	15%	29%	0%	**19%**	0%	0%	0%	**0%**
Conversion in progress	10%	21%	0%	**13%**	0%	0%	0%	**0%**
Conversion completed - vacant residential unit(s)	3%	0%	0%	**1%**	0%	33%	0%	**20%**
Conversion completed - occupied residential unit(s)	46%	33%	60%	**43%**	0%	67%	0%	**40%**
Unclear	8%	0%	0%	**4%**	0%	0%	100%	**20%**
Converted (total)	59%	54%	60%	**57%**	0%	100%	0%	**60%**
Building original use:								
Residential single dwelling	41%	71%	60%	**53%**	100%	100%	0%	**80%**
Residential apartment building	3%	0%	0%	**1%**	0%	0%	0%	**0%**
Office building pre-WWII	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Office building 1950s-70s	13%	0%	0%	**7%**	0%	0%	0%	**0%**
Office building 1980s-present	8%	0%	0%	**4%**	0%	0%	0%	**0%**
Warehouse or light industrial building pre-WWII	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Warehouse or light industrial building post-WWII	10%	0%	40%	**9%**	0%	0%	100%	**20%**
Light industrial ground floor / residential above	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail building post-WWII	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail ground floor / residential above	26%	29%	0%	**25%**	0%	0%	0%	**0%**
Unclear	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Average building height (number of floors)	2.0	2.0	2.0	**2.0**	2.0	2.0	1.0	**1.8**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
Number of schemes 1-2 units	57%	54%	33%	**54%**	N/A	100%	N/A	**100%**
Number of schemes 3-9 units	17%	8%	33%	**15%**	N/A	0%	N/A	**0%**
Number of schemes 10-29 units	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Number of schemes above 30 units	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Unclear	26%	38%	33%	**31%**	N/A	0%	N/A	**0%**
If converted, obvious notable alterations made:								
New windows	30%	23%	67%	**31%**	N/A	67%	N/A	**67%**
New doors	35%	23%	67%	**33%**	N/A	67%	N/A	**67%**
Balconies added	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Site landscaping	9%	8%	0%	**8%**	N/A	33%	N/A	**33%**
New cladding	26%	15%	0%	**21%**	N/A	33%	N/A	**33%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Car parking	13%	8%	0%	**10%**	N/A	0%	N/A	**0%**
Concierge	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Gym	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Roof terrace	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Private open space	4%	8%	0%	**5%**	N/A	0%	N/A	**0%**
Public open space	0%	0%	0%	**0%**	N/A	0%	N/A	**0%**
Adequate provision made for waste / refuse	48%	54%	100%	**54%**	N/A	100%	N/A	**100%**
Adequate provision made for mail deliveries	74%	62%	100%	**72%**	N/A	100%	N/A	**100%**
Building location:								
City or town centre mixed use	28%	4%	0%	**18%**	0%	0%	0%	**0%**
Local high street mixed use	26%	42%	20%	**31%**	0%	0%	0%	**0%**
Mostly commercial area	3%	0%	0%	**1%**	0%	0%	0%	**0%**
Mostly industrial area	10%	0%	20%	**7%**	0%	0%	0%	**0%**
Mostly residential area	33%	54%	60%	**43%**	100%	100%	100%	**100%**
Isolated rural area	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Not answered	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	85%	96%	80%	**88%**	0%	67%	100%	**60%**
Obviously accessible by public transport	92%	96%	100%	**94%**	100%	67%	100%	**80%**
Obviously close to local open or green space	67%	33%	40%	**53%**	0%	0%	0%	**0%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 23 implemented conversion schemes in Enfield are illustrated by Table 27, below.

Table 27: Results of desk based analysis for Enfield

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	11	9	0	**20**	0	3	0	**3**
Permission for change of use:								
Prior approval - one only	27%	11%	N/A	**20%**	N/A	0%	N/A	0%
Prior approval - multiple	27%	33%	N/A	**30%**	N/A	0%	N/A	0%
Planning permission - one only	0%	0%	N/A	**0%**	N/A	0%	N/A	0%
Planning permission - multiple	0%	0%	N/A	**0%**	N/A	67%	N/A	67%
Both prior approval and planning permission	45%	56%	N/A	**50%**	N/A	33%	N/A	33%
Prior approval with associated planning permission	18%	0%	N/A	**10%**	N/A	N/A	N/A	**N/A**
Number of units created	30	15	N/A	**45**	N/A	3	N/A	**3**
Average number of units per scheme	2.73	1.67	N/A	**2.24**	N/A	1	N/A	**1**
Unit sizes:								
Studio flats	23%	7%	N/A	**18%**	N/A	33%	N/A	**33%**
One bedroom flats	37%	20%	N/A	**31%**	N/A	33%	N/A	**33%**
Two bedroom flats	30%	53%	N/A	**38%**	N/A	33%	N/A	**33%**
Three or more bedroom flats	10%	20%	N/A	**13%**	N/A	0%	N/A	**0%**
Maisonette or house	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
Units complying with national space standards	50%	73%	N/A	**58%**	N/A	100%	N/A	**100%**
Units with access to private amenity space	10%	53%	N/A	**24%**	N/A	67%	N/A	**67%**
Buildings with access to communal amenity space	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
Only skylights or rooflights	10%	0%	N/A	**7%**	N/A	0%	N/A	**0%**
Only facing an atrium	0%	13%	N/A	**4%**	N/A	0%	N/A	**0%**
Single aspect	33%	20%	N/A	**29%**	N/A	0%	N/A	**0%**
Single aspect / north facing only	7%	0%	N/A	**4%**	N/A	0%	N/A	**0%**
Dual or triple aspect windows	67%	80%	N/A	**71%**	N/A	100%	N/A	**100%**
EPC rating:								
A	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
B	9%	0%	N/A	**5%**	N/A	0%	N/A	**0%**
C	18%	22%	N/A	**20%**	N/A	33%	N/A	**33%**
D	45%	11%	N/A	**30%**	N/A	0%	N/A	**0%**
E	18%	44%	N/A	**30%**	N/A	0%	N/A	**0%**
F	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
G	0%	0%	N/A	**0%**	N/A	33%	N/A	**33%**
Could not tell	9.1%	22.2%	N/A	**15%**	N/A	33.3%	N/A	**33.3%**
Council tax:								
A	0%	0%	N/A	**0%**	N/A	33%	N/A	**33%**
B	27%	44%	N/A	**35%**	N/A	0%	N/A	**0%**
C	27%	33%	N/A	**30%**	N/A	33%	N/A	**33%**
D	18%	0%	N/A	**10%**	N/A	0%	N/A	**0%**
E	0%	0%	N/A	**0%**	N/A	33%	N/A	**33%**
F	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
G	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
H	0%	0%	N/A	**0%**	N/A	0%	N/A	**0%**
Could not tell	27.3%	22.2%	N/A	**25%**	N/A	0%	N/A	**0%**
GIS Analysis:								
Average Index Multiple deprivation	4.80	3.30	N/A	**4.13**	N/A	3.0	N/A	**3.0**
Average Access to Public Green Space score	4.70	4.80	N/A	**4.75**	N/A	5.6	N/A	**5.6**
Walking distance to small supermarket	82%	44%	N/A	**65%**	N/A	100%	N/A	**100%**
Walking distance to large supermarket	82%	22%	N/A	**55%**	N/A	67%	N/A	**67%**
Walking distance to a bus stop	100%	100%	N/A	**100%**	N/A	67%	N/A	**67%**
Walking distance to a rail station	91%	78%	N/A	**85%**	N/A	100%	N/A	**100%**

The desk based research is based on an analysis of the following prior approval schemes:

- *125b Silver Street, London; 131c Baker Street, Enfield; 206 Green Street, Enfield; 210 Green Street, Enfield; 25 Hertford Road, Enfield; 313b Baker Street, Enfield; 321 Baker Street, Enfield; 353a Fore Street, London; 3a Chase Side, London; 419 Hertford Road, Enfield; 421 Hertford Road, Enfield; 487*

Green Lanes, London; 55 - 57 Chase Side, London; 58 Aldermans Hill, London; 612 Hertford Road, Enfield; 826 Green Lanes, London; 9 Church Street, Enfield; 92-94 Fore Street, London; 93 Bowes Road, London; Read of 77 Bounces Road, London; Unit 1, 22 Bull Lane, London; Units 2-3, Sovereign Business Centre, Stockingswater Lane, Enfield

And the following planning permission schemes:

- *194 Whittington Road, London; 57 Brimsdown Avenue, Enfield; 99 Hertford Road, London*

Like Crawley, Enfield had comparatively few implemented change of use schemes which had gone through the full planning permission route, and therefore it is harder to draw firm comparison between that route and the PD route. Drawing a comparison, though, shows a board similarity across many potential indicators of quality assessed in this desk-based analysis but there is a suggestion of difference around internal space standards, with 100% of the planning permission units meeting this, compared to 58% of the PD units. The access to public green space score also suggests that the prior approval schemes tend to be in neighbourhoods with worse access to green space than the full planning permission schemes, reflecting what we were told in interview. Beyond that, the PD schemes can clearly be judged from their own data in addition to trying to make a comparison to full planning permission schemes.

Within the PD schemes, there is a reasonable number of both office-to-residential and retail sui generis-to-residential schemes considered in Enfield. In general, the retail-to-residential schemes would appear to be slightly higher quality, with a higher compliance with Nationally Described Space Standards, a higher percentage of units with access to private amenity space, a higher rate of units with dual aspect windows and a lower rate of studio flats. Notably, three office-to-residential units only had daylight through a skylight or rooflight, without a window that a resident would be able to look out of. The office-to-residential units did, however, tend to have a slightly better EPC rating and, perhaps somewhat ironically, tend to be closer to supermarket style shops.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 27m^2 in 826 Green Lanes. The mean average of the smallest unit found in each prior approval scheme examined in Enfield was 62.1m^2. The smallest unit found in a planning permission scheme was the 38m^2 in 99 Hertford Road. This complies with NDSS, and the space standards are discussed in the officer report. The mean average of the smallest unit found in each planning permission scheme examined in Enfield was 58.3m^2.

Conclusions

Enfield had a medium level of scheme implementation, in both the prior approval and planning permission categories. There was a higher rate of exterior alternations made for planning permission units, and these were much more likely to comply with national space standards and provide amenity space. However, it is notable that the 58% of PD units meeting national space standards is much higher than has been seen in a number of other case studies.

Appendix 5: Case Study Five – Huntingdonshire

Introduction and planning context

A historic county in its own right, Huntingdonshire has been a district level authority within Cambridgeshire County Council area, since 1974. It is classified as a 'Rural 80' authority and is in the East of England region. The local authority contains the historic market towns of Huntingdon, Ramsey, St Ives and St Neots and a number of smaller village and hamlet settlements spread over a rural area, including areas of fen landscape.

Although predominantly rural in nature, the district is located a commutable distance from the cities of Cambridge and Peterborough and is within the area of the Cambridgeshire and Peterborough Combined Authority. Headed by a directly elected mayor, this combined authority has powers over strategic planning, including the ability to create a non-statutory spatial framework for Cambridgeshire and Peterborough.[74]

Huntingdonshire's Local Plan was adopted in May 2019.[75] The plan notes a need for 20,100 homes (both market and affordable, within which there is a need for about 7,900 affordable homes) from 2011-2036. A deliverable, sustainable pattern of future development is sought. Policy L2 of the plan seeks to concentrate development in sustainable locations which are served by a range of services and facilities, albeit it makes an allowance that "rural exception, small and windfall sites will be permitted on sites which are in conformity with other policies of this plan providing further flexibility in the housing supply".[76] A high priority is given in the plan policies to development's supporting the provision of green infrastructure.

The plan seeks to it delivers a target of 40% affordable housing on a site where 11 homes or more are proposed and to ensure that 100% of new dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. There is also a policy on rural exceptions housing. The local plan has a policy requiring schemes to demonstrate they respond to their design context and that amenity considerations have been taken into account. It cross-references the *Huntingdonshire Design Guide SPD*, which was adopted in March 2017.[77] This establishes design and place-making principles, but does not include internal space standards.

There is also an SPD on *Developer Contributions*, adopted in December 2011, with updated costs for 2019-20.[78][79] This explains that the Council seeks, where appropriate, planning obligations towards affordable housing, green space, footpaths and access, health and community facilities, library and lifelong learning facilities, schools, for the provision of residential wheeled bins (standard charger per new dwelling) and towards regeneration projects. Huntingdonshire has also adopted a CIL charging schedule since April 2012.[80]

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[74] 'Mayor' at https://cambridgeshirepeterborough-ca.gov.uk/about-us/mayor/
[75] 'Huntingdonshire Local Plan to 2036' at https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf
[76] Ibid page 32
[77] 'Huntingdonshire Design Guide' https://www.huntingdonshire.gov.uk/media/2573/huntingdonshire-design-guide-2017.pdf
[78] 'Developer Contributions SPD' https://www.huntingdonshire.gov.uk/media/1127/developer-contributions-spd.pdf
[79] 'Developer Contributions Updated Costs' https://www.huntingdonshire.gov.uk/media/1239/developer-contributions-updated-costs.pdf
[80] 'Huntingdonshire Community Infrastructure Levy' at https://www.huntingdonshire.gov.uk/media/1048/cil-charging-schedule.pdf

There are currently no Article 4 directions in relation to changes of use to residential in Huntingdonshire. Figure 27, below, is a map illustrating change of use schemes through both the PD and FPA routes in Huntingdonshire, 2015-2018.

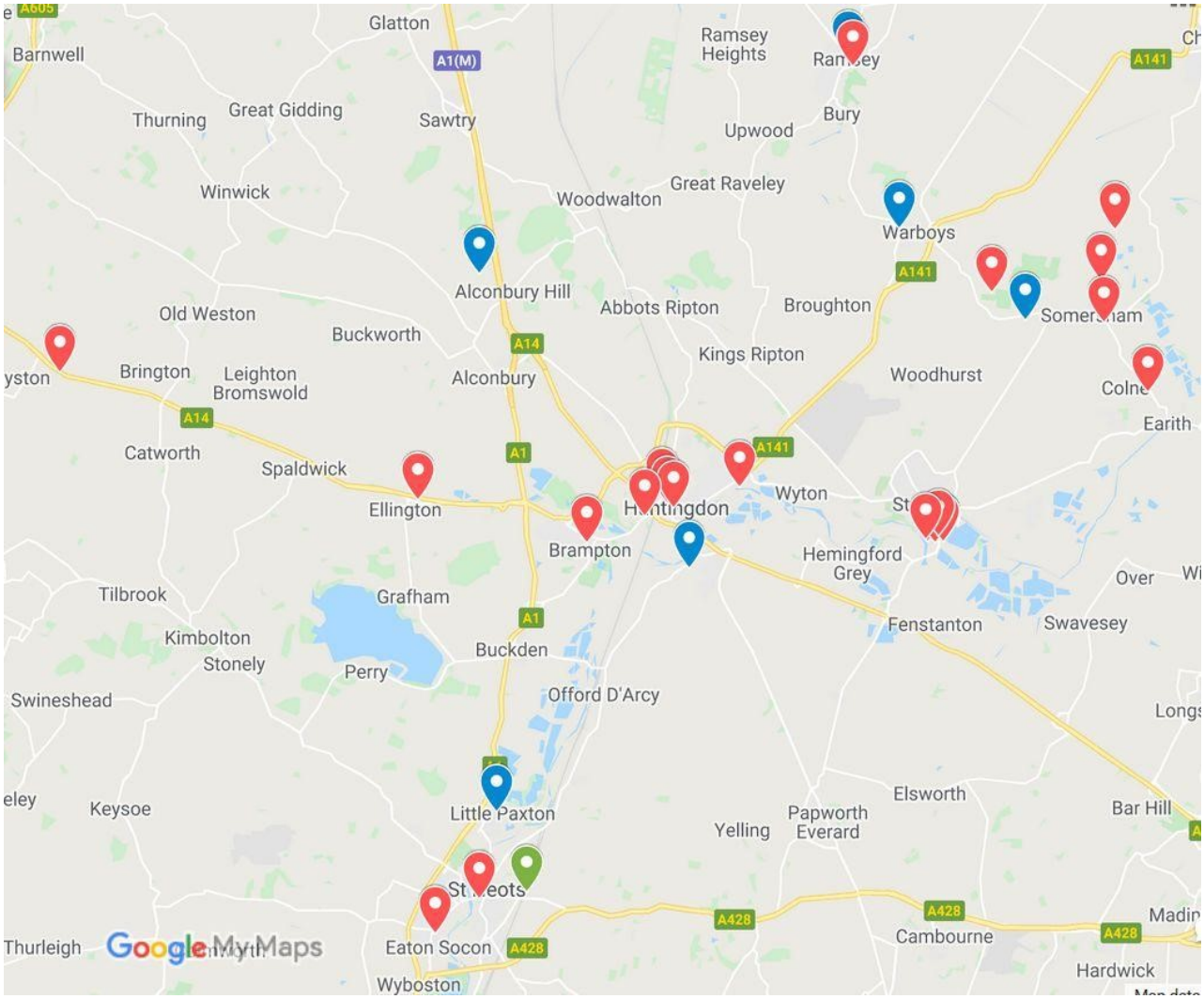

Figure 27: Map illustrating change of use schemes through both the PD and FPA routes in Huntingdonshire, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local housing and real estate market

Huntingdonshire local authority has low rates of unemployment at 2.8%, and low levels of deprivation (4.8% of the population falling into the lowest three deciles of the multiple deprivation index), although the job density for the local economy is below the national average at 0.75. Although the local housing market has only seen minimal annual growth in prices, over the last five years prices have increased by 34.8%. House price to earnings ratios currently sit at 8.44 having increased from 6.31 in 2012. The local office market is reasonably small with just over 2 million square feet of space, and is dominated by space rated 3 stars or less (although there is an Enterprise Zone at Alconbury Weald). Only 97,735 square feet of office space is considered 4 & 5 star, or prime. Vacancy rates are low at 1.7% and so is rental growth in the office sector, at 0.2% for the year. The retail sector has seen more supply come onto the market this year, as rental growth continues to increase (2.9%), the market appears robust.

Local authority views

The planning officer interviewed in Huntingdonshire was concerned that the location of a number of permitted development schemes was not sustainable. This was primarily an issue with agricultural-to-residential schemes but had also been seen in relation to other categories of change of use. This reflects the predominantly rural geography of the district. There were also issues in relation to design quality and amenity in particular, and no ability for the Council to influence these. Other permitted development schemes tended to be clustered in the market towns and there could be concerns around space standards, daylight and outlook for permitted development schemes. They can often be in town centres with cramped residential units in buildings located close to other buildings and with no external amenity space, which would be a priority for negotiation had they been full planning applications instead.

Permitted Development had, however, helped the Council to meet its Objectively Assessed Need for housing supply and has added a level of certainty to the delivery of some smaller sites. They have included 20 units per annum from PD in the new local plan (adopted in May 2019), and this was agreed with the Planning Inspector. It has also led to a positive reuse of some vacant buildings.

For the new local plan, the Council were more concerned about the Building Regulation M4 standard on adaptability and accessibility than space standards, given their ageing population. They have developed a design guide SPD which is used for all residential planning applications and an in-house design team supports such consideration.

They have not seen any need for an Article 4 Direction in Huntingdonshire given that they do not have a supply of large office buildings vulnerable to conversion. Some of the larger office-to-residential schemes (in the local context) have not actually been implemented and are still in-use as offices.

Prior approval for some light industrial-to-residential conversions (and agricultural-to-residential conversions) had been refused on the grounds the buildings were not structurally capable of conversion. The Council will now often ask to see the inside of a building to check it actually in that current use before allowing prior approvals. They have won an appeal decision on a prior approval they refused in the period we are examining in this research.

The usual approach in Huntingdonshire is to say that prior approval is required and granted (or refused) rather than to use ‘prior approval not required’ and there was a feeling that there was some confusion around this, which was also seen with the old agricultural part six. A recent High Court case has shown that the Council cannot agree with an applicant an extension of time to consider a Prior Approval. This was something that had been done in the past so now there is a tendency to refuse prior approvals if the information provided is unclear or insufficient. This is usually around flooding but may also relate to other matters such as the condition or current use of the building.

Conditions are usually applied to prior approvals, particularly in relation to contamination (for example, fuel in storage-to-industrial schemes), flooding and highways (for example, that a discharge of condition application to approve necessary access changes must be approved before a prior approval can be allowed).

The Council have also been advised that they have a statutory duty to consider the ecological impacts of conversions, even though this is not explicitly specified in the GPDO. They therefore usually ask applicants to advise in relation to whether they need any licenses in relation to this as part of the prior approval process.

In relation to Section 106 and unilateral undertakings, the Council usually ask for funding for a set of wheeled bins for new housing, for affordable housing contributions on schemes over 11 units and for green space provision on site or off-site contributions. These are not applied to PD schemes. CIL

payments are usually not obtained from PD schemes due to applicants and agents claiming that they have been in use for at least six months over the three years prior to conversion.

Enforcement action has not been taken in relation to any PD schemes in the district, nor was there was an awareness of any particular Building Control issues in relation to them. The interviewee had, however, liaised with them about structural issues on Class Q (agricultural-to-residential conversions) and also wondered what might happen in future in relation to the Part M accessibility requirements being under Building Regulations.

It was apparently not uncommon to get planning applications for changes of use to residential locally before permitted development. It is also not uncommon to now get a prior approval as a 'fall back' option but to then apply via a planning permission to demolish and rebuild instead.

No particular developer stands out locally as schemes are often proposed by an array of individuals (albeit with some agents cropping up repeatedly). Most implemented conversions are going for market sale housing. No particular schemes stood out locally as most are small scale, often conversion to single large dwelling in rural areas, or just to two or three dwellings in the market towns.

Assessing quality: site visits

Table 28 presents a summary of the data collected on our site visits in Huntingdonshire. Key findings are that:

- In Huntingdonshire, there were 22 prior approval conversions in total, 16 of which were office-to-resi and 6 retail/sui generis-to-resi. There were no light industrial-to-resi conversions through prior approval. There were 2 planning permission conversions in each category.
- Implementation rates between prior approval and planning permissions were similar at 68% and 67% respectively.
- There appears to be some difference between prior approval schemes and planning permission schemes in Huntingdonshire, prior approval schemes are less likely to have adequate provision for waste/refuse and mail delivery and are less likely to be close to amenities (see Figure 29 and Table 28). However, numbers of planning permission schemes for change of use to residential are noted to be small and therefore difficult to draw robust conclusions.
- Figure 28 shows number of dwelling units per scheme. All the six planning permission schemes were 1-2 units only. The majority of prior approval converted schemes were also small - eight schemes were 1-2 units and 4 schemes 3-9 units. Of the prior approval schemes, there were two larger office-to-resi conversions, one between 10-29 units and the other with more than 30 units.

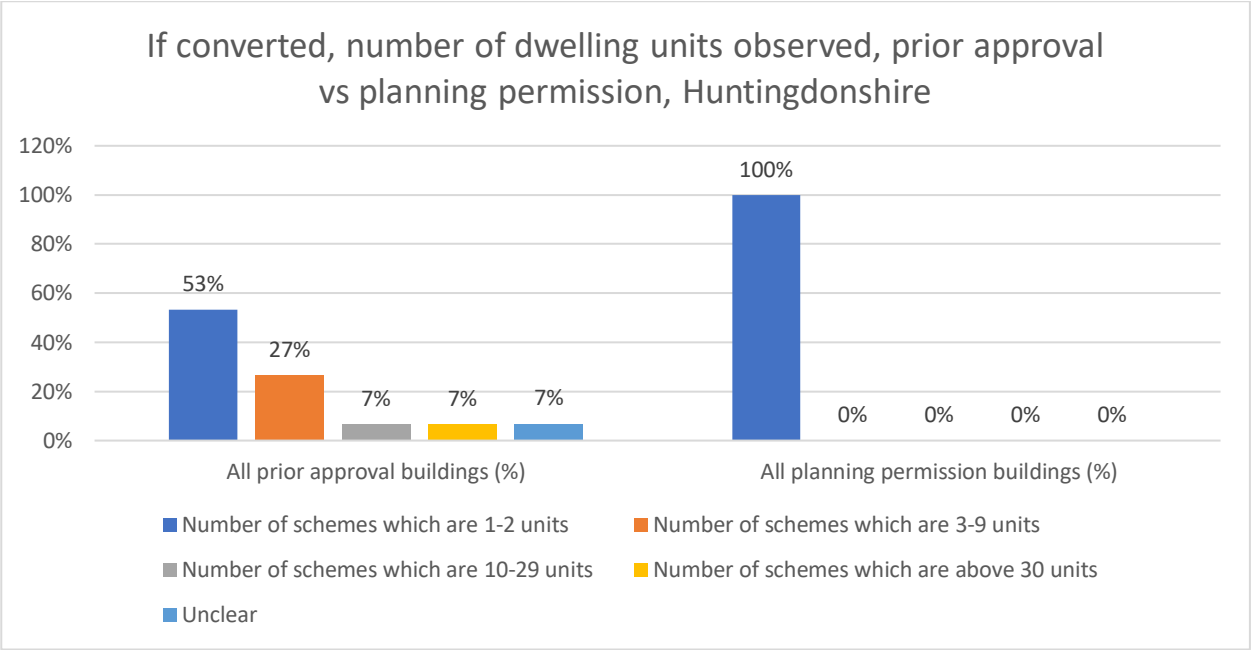

Figure 28: Number of dwelling units observed, prior approval vs planning permission, Huntingdonshire

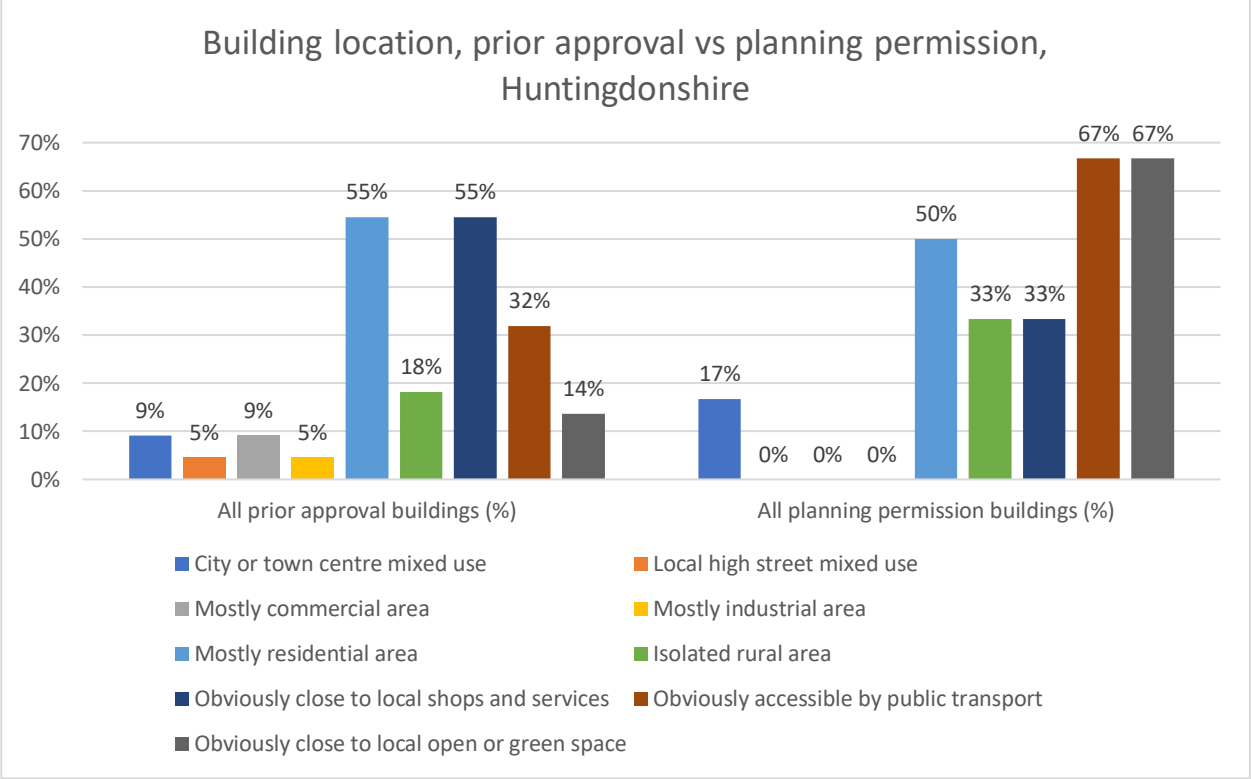

Figure 29: Building location and accessibility to amenities, prior approval vs planning permission, Huntingdonshire

Table 28: Results of site visits in Huntingdonshire

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	16	0	6	**22**	2	2	2	**6**
Current state:								
Conversion not started - vacant business premises	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Conversion not started - partially occupied business premises	13%	N/A	33%	**18%**	0%	50%	0%	**17%**
Conversion not started - fully occupied business premises	6%	N/A	0%	**5%**	0%	50%	0%	**17%**
Conversion in progress	19%	N/A	50%	**27%**	50%	0%	0%	**17%**
Conversion completed - vacant residential unit(s)	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Conversion completed - occupied residential unit(s)	50%	N/A	17%	**41%**	50%	0%	100%	**50%**
Unclear	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Converted (total)	69%	N/A	67%	**68%**	100%	0%	100%	**67%**
Building original use:								
Residential single dwelling	50%	N/A	0%	**36%**	100%	50%	0%	**50%**
Residential apartment building	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Office building pre-WWII	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Office building 1950s-70s	13%	N/A	0%	**9%**	0%	0%	0%	**0%**
Office building 1980s-present	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Warehouse or light industrial building pre-WWII	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Warehouse or light industrial building post-WWII	6%	N/A	100%	**32%**	0%	0%	100%	**33%**
Light industrial ground floor / residential above	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Retail building post-WWII	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Retail ground floor / residential above	13%	N/A	0%	**9%**	0%	50%	0%	**17%**
Unclear								
Average building height (number of floors)	2.2	N/A	2	**2.1**	2.5	2	1.5	**2.1**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	36%	N/A	100%	**53%**	100%	0%	100%	**100%**
3-9 units	36%	N/A	0%	**27%**	0%	0%	0%	**0%**
10-29 units	9%	N/A	0%	**7%**	0%	0%	0%	**0%**
30 units +	9%	N/A	0%	**7%**	0%	0%	0%	**0%**
Unclear	9%	N/A	0%	**7%**	0%	0%	0%	**0%**
If converted, obvious notable alterations made:								
New windows	55%	N/A	100%	**67%**	50%	0%	100%	**75%**
New doors	55%	N/A	100%	**67%**	50%	0%	100%	**75%**
Balconies added	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Site landscaping	36%	N/A	0%	**27%**	0%	0%	50%	**25%**
New cladding	36%	N/A	100%	**53%**	0%	0%	100%	**50%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Car parking	64%	N/A	100%	**73%**	50%	0%	100%	**75%**
Concierge	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Gym	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Roof terrace	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Private open space	18%	N/A	75%	**33%**	50%	0%	100%	**75%**
Public open space	9%	N/A	0%	**7%**	0%	0%	0%	**0%**
Adequate provision made for waste / refuse	73%	N/A	75%	**73%**	100%	0%	100%	**100%**
Adequate provision made for mail deliveries	82%	N/A	75%	**80%**	100%	0%	100%	**100%**
Building location:								
City or town centre mixed use	13%	N/A	0%	**9%**	0%	50%	0%	**17%**
Local high street mixed use	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Mostly commercial area	13%	N/A	0%	**9%**	0%	0%	0%	**0%**
Mostly industrial area	6%	N/A	0%	**5%**	0%	0%	0%	**0%**
Mostly residential area	63%	N/A	33%	**55%**	100%	50%	0%	**50%**
Isolated rural area	0%	N/A	67%	**18%**	0%	0%	100%	**33%**
Not answered	0%	N/A	0%	**0%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	75%	N/A	0%	**55%**	50%	50%	0%	**33%**
Obviously accessible by public transport	44%	N/A	0%	**32%**	100%	100%	0%	**67%**
Obviously close to local open or green space	19%	N/A	0%	**14%**	100%	100%	0%	**67%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 12 implemented conversion schemes in Huntingdonshire are illustrated by Table 29, below.

Table 29: Results of desk based analysis for Huntingdonshire

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	6	0	2	**8**	2	0	2	**4**
Permission for change of use:								
Prior approval - one only	67%	N/A	50%	**63%**	0%	N/A	0%	**0%**
Prior approval - multiple	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
Planning permission - one only	0%	N/A	50%	**13%**	100%	N/A	50%	**75%**
Planning permission - multiple	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
Both prior approval and planning permission	33%	N/A	0%	**25%**	0%	N/A	50%	**25%**
Prior approval with associated planning permission	50%	N/A	0%	**38%**	N/A	N/A	N/A	**N/A**
Number of units created	81	N/A	2	**83**	2	N/A	4	**6**
Average number of units per scheme	13.5	N/A	1	**10.38**	1	N/A	2	**1.5**
Unit sizes:								
Studio flats	9%	N/A	50%	**10%**	0%	N/A	0%	**0%**
One bedroom flats	62%	N/A	0%	**60%**	0%	N/A	0%	**0%**
Two bedroom flats	26%	N/A	0%	**25%**	0%	N/A	0%	**0%**
Three or more bedroom flats	2%	N/A	0%	**2%**	0%	N/A	0%	**0%**
Maisonette or house	1%	N/A	50%	**2%**	100%	N/A	100%	**100%**
Units complying with national space standards	38%	N/A	100%	**40%**	100%	N/A	100%	**100%**
Units with access to private amenity space	5%	N/A	50%	**6%**	0%	N/A	75%	**50%**
Buildings with access to communal amenity space	17%	N/A	50%	**25%**	100%	N/A	100%	**100%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
Only skylights or rooflights	2%	N/A	0%	**2%**	0%	N/A	0%	**0%**
Only facing an atrium	19%	N/A	0%	**18%**	0%	N/A	0%	**0%**
Single aspect	73%	N/A	0%	**71%**	0%	N/A	0%	**0%**
Single aspect / north facing only	12%	N/A	0%	**12%**	0%	N/A	0%	**0%**
Dual or triple aspect windows	25%	N/A	100%	**27%**	100%	N/A	100%	**100%**
EPC rating:								
A	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
B	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
C	33%	N/A	0%	**25%**	0%	N/A	0%	**0%**
D	50%	N/A	50%	**50%**	50%	N/A	0%	**25%**
E	0%	N/A	0%	**0%**	0%	N/A	50%	**25%**
F	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
G	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
Could not tell	16/7%	N/A	50%	**25%**	50%	N/A	50%	**50%**
Council tax:								
A	33%	N/A	0%	**25%**	0%	N/A	0%	**0%**
B	17%	N/A	50%	**25%**	0%	N/A	0%	**0%**
C	0%	N/A	50%	**13%**	0%	N/A	0%	**0%**
D	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
E	0%	N/A	0%	**0%**	0%	N/A	50%	**25%**
F	17%	N/A	0%	**13%**	0%	N/A	0%	**0%**
G	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**
H	0%	N/A	0%	**0%**	50%	N/A	0%	**25%**
Could not tell	33.3%	N/A	0%	**25%**	50%	N/A	50%	**50%**
GIS Analysis:								
Average Index Multiple deprivation	6.7	N/A	7.5	**6.9**	6.0	N/A	5.0	**5.5**
Average Access to Public Green Space score	6.8	N/A	10	**7.6**	8.0	N/A	10.0	**9.0**
Walking distance to small supermarket	67%	N/A	0%	**50%**	0%	N/A	0%	**0%**
Walking distance to large supermarket	50%	N/A	0%	**38%**	0%	N/A	0%	**0%**
Walking distance to a bus stop	83%	N/A	50%	**75%**	100%	N/A	50%	**75%**
Walking distance to a rail station	0%	N/A	0%	**0%**	0%	N/A	0%	**0%**

The desk based research is based on an analysis of the following prior approval schemes:

- *11 Bridge Street, St Ives; 1a South Street, St Neots; 210 Great North Road, Eaton Socon, St Neots; Anglian House, Ambury Road South, Huntingdon; Cromwell Court, New Road, St Ives; Heap Farm, The Hollow, Ramsey; Ilala, Parhall Road, Somersham; The White Gates, Thrapston Road, Bythorn*

And the following planning permission schemes:

- *11 Ramsey Road, Warboys, Huntingdon; 24 West Street, Godmanchester, Huntingdon; Southview, Somersham Road, Pidley; Upton Hill Woods, Main Street, Upton*

Although the overall number of planning permission change of use schemes considered is quite small in Huntingdonshire, the results are of interest as we are able to compare two storage / light industrial-to-residential PD schemes with two storage / light industrial-to-residential full planning permission schemes here. From our site visits, we know these tend to be isolated rural structures which have been converted. Looking specifically at this category, the quality of both reflects that they are often buildings converted into single dwellings, with, for example, 100% meeting Nationally Described Space standards.

Looking overall at the schemes in Huntingdonshire, it is noticeable that just 40% of all the PD units met space standards compared to 100% of the full planning permission units, and that just 6% of the PD units had access to private amenity space, compared to 50% of the full planning permission units. These figures are largely driven by the larger office-to-residential schemes. It is these schemes which also explain the figure of 71% of the PD units being single aspect only (compared to 0% of the full planning permission units) and noteworthy that we found two such units that appeared to have no windows at all, just sky or rooflights. The PD schemes did tend to score better than the full-planning permission schemes in terms of accessibility to supermarkets and public green space, but this doubtless reflects their concentration in the market towns of the district as opposed to more isolated rural areas.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 25m^2 in Cromwell Court. This scheme had a full planning permission a well as a prior approval, with the prior approval serving as a fallback option for scheme implementation. The 28m^2 unit in 1a South Street was for a scheme with just a prior approval. The mean average of the smallest unit found in each prior approval scheme examined in Huntingdonshire was 68.21m^2. The smallest unit found in a planning permission scheme was actually the 155m^2 in Southview, but this reflects the nature of the full planning permission conversions considered, which were usually conversions to single dwellings rather than apartment blocks. The mean average of the smallest unit found in each planning permission scheme examined in Huntingdonshire was 200m^2.

Conclusions

Huntingdonshire is our most rural local authority examined, and interestingly a number of storage / light industrial-to-residential schemes in the district were to be found on farms and in isolated rural locations. In market towns, conversions tend to be office-to-residential. Taken together, there is a much lower rate of compliance with national space standards in PD units than planning permission units. However, a good rate of PD conversions have made alterations such as new doors and windows.

Appendix 6: Case Study Six – Manchester

Introduction and planning context

Manchester is a unitary authority and the major city of the North West of England. Like Bristol, it is one of the UK's core cities and is a major urban area. Characterised by the predominance of Industrial Revolution related nineteenth century buildings (including housing), the city centre has been undergoing rapid change in the twenty-first century and is closely associated with the 'Northern Powerhouse' strategy.

The authority is part of the Greater Manchester Combined Authority area, with a directly elected mayor. The combined authority adopted a housing strategy in June 2019.[81] Work is underway on a *Greater Manchester Spatial Framework*, with a revised draft published in January 2019.[82] The plan priorities brownfield sites for development and seeks more residential development in town centres. Policy GM-H1 outlines that 201,000 net additional dwellings will be delivered 2019-37, around 10,580 per annum. Within this, it is proposed that the Manchester city local authority area will see 54,530 new homes, or 2,870 per annum. The plan also expresses concerns about increasing affordability problems and sets a target for at least 50,000 of the 201,000 net additional homes to be affordable.

The plan expresses concern that downward pressure on dwelling size "potentially creates a number of problems, resulting in less adaptable dwellings that are unable to respond to the changing needs of households, poor health resulting from cramped conditions and overcrowding, and overall a lower quality of life".[83] Whilst leaving the detail of dwelling type and size mix to the local plans of the ten Greater Manchester authorities, policy GM-H3 specified that all new dwellings must comply with nationally described space standards and be built to the accessible and adaptable standard in Building Regulations Part M4(2) (unless site specific conditions make this impracticable).

The Core Strategy Development Plan Document for Manchester city local authority area was adopted July 2012.[84] Policy H1 calls for all new housing provision to contribute to the plan's design principles, in particular providing usable amenity space (in high density development this might be balconies and/or share open spaces such as green roofs), addressing any deficiencies in physical, social or green infrastructure, and being close to high frequency public transport.

Some further guidance on design is provided in the *Guide to Developing in Manchester Supplementary Planning Document*, adopted April 2007.[85] The Providing for Housing Choice Supplementary Planning Document, adopted September 2008, gives some further detail about affordable housing design and provision.[86] There is no specific SPD on planning obligations and Manchester has not adopted a CIL charging schedule.

The city centre of Manchester was one of the few areas exempted from office to residential permitted development when it was first introduced in 2013, and this was then re-confirmed in the General

[81] 'Greater Manchester Housing Strategy 2019-24' at https://www.greatermanchester-ca.gov.uk/media/2257/gm-housing-strategy-2019-2024.pdf
[82] 'Greater Manchester's Plan for Homes, Jobs and the Environment' at https://www.greatermanchester-ca.gov.uk/media/1710/gm_plan_for_homes_jobs_and_the_environment_1101-web.pdf
[83] Ibid page 118
[84] 'Final Core Strategy' at https://www.manchester.gov.uk/downloads/download/4964/core_strategy_development_plan
[85] 'Guide to development in Manchester SPD' at https://www.manchester.gov.uk/downloads/download/644/guide_to_development_in_manchester_-_supplementary_planning_document_and_planning_guidance_spd
[86] 'Providing for Housing Choice SPD' at https://www.manchester.gov.uk/site/scripts/download_info.php?fileID=8646

Permitted Development Order issued in 2015 with a deadline of 30 May 2019 for this exemption.[87] Given the expiry of this exemption, Manchester City Council made four Article 4 directions to restrict office to residential permitted development, covering respectively the city centre and Strangeways, parts of north Manchester, parts of south Manchester and parts of Wythenshawe, which all came into force on 1 May 2019.[88] They also introduced a further four Article 4 directions to restrict light industrial to residential permitted development, covering respectively the north east of the city centre and Strangeways, parts of north Manchester, parts of south Manchester and parts of Wythenshawe, which also came into force on 1 May 2019.[89]

Figure 30, below, is a map illustrating change of use schemes through both the PD and FPA routes in Manchester, 2015-2018.

Local housing and real estate market

Manchester is a key regional centre in the North West, and has the largest population of all our case studies, with the highest percentage of working-age residents at 70%. However, the local authority has high levels of deprivation, with 74.5% falling into the three lowest deciles of the index. Manchester also has the second highest level of unemployment in our case studies, even though it has a high job density factor of 1.14. Housing prices have increased almost 40% in five years, and the house price to earnings ratio is moderate, at 6.63. The office market however, has been booming recently, with the growth in flexible office space and business districts. New supply is constantly coming onto a market where demand is currently consistently high, even with a 5.8% vacancy rate rents have grown 4.6% annually. The retail market is viewed as key to the regional economy, and in total is comprised of over 72 million square feet, with low vacancy rates at 1.5% with any new supply being readily absorbed.

[87] 'The Town and Country Planning (General Permitted Development) (England) Order 2015' at http://www.legislation.gov.uk/uksi/2015/596/pdfs/uksi_20150596_en.pdf

[88] 'Article 4 Directions: changing the use of a property from office to residential' at https://www.manchester.gov.uk/info/500207/planning_and_regeneration/7646/article_4_directions/2

[89] 'Article 4 Directions: changing the use of a property from light industry to residential' at https://www.manchester.gov.uk/info/500207/planning_and_regeneration/7646/article_4_directions/3

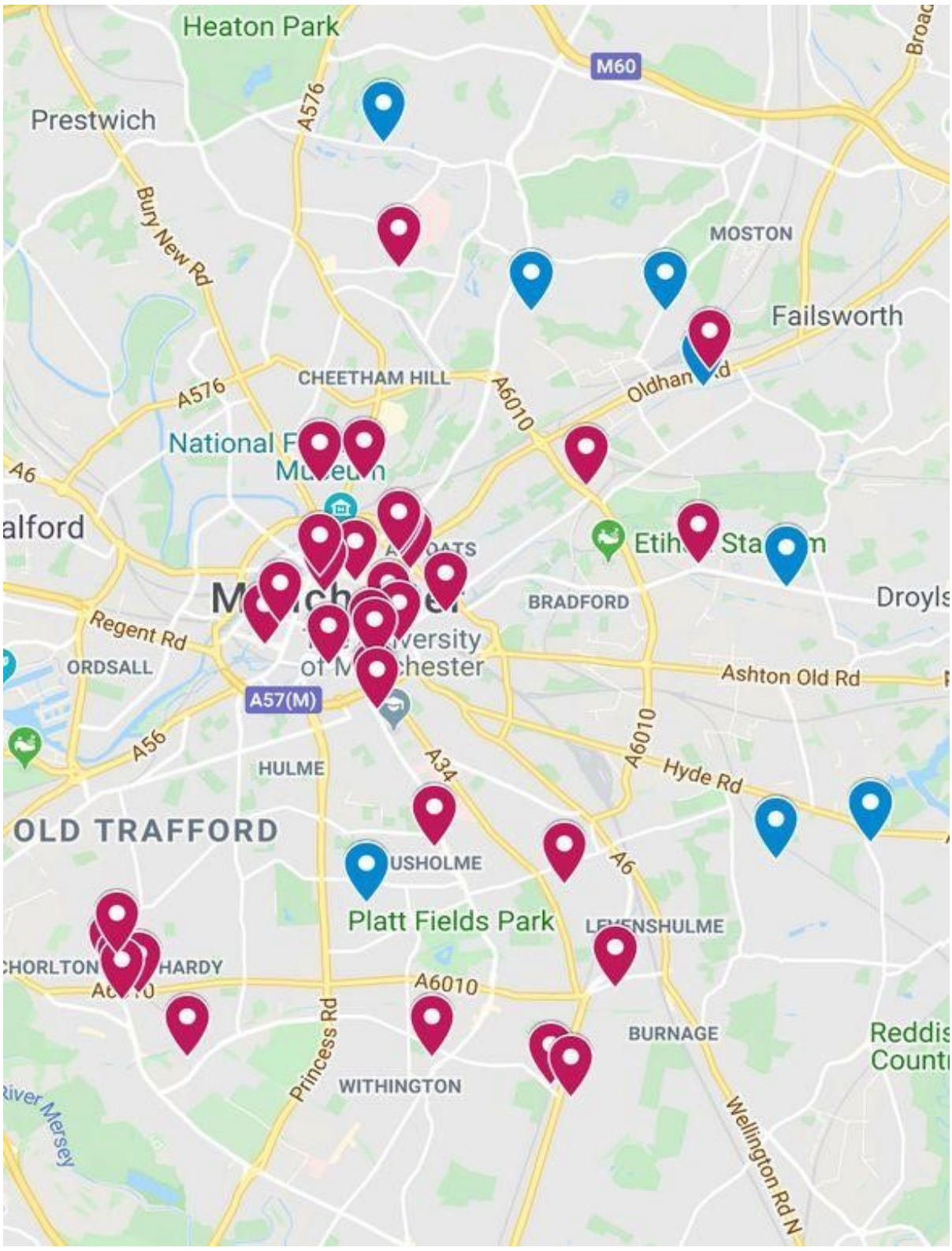

Figure 30: Map illustrating change of use schemes through both the PD and FPA routes in Manchester, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local authority views

With the approaching expiry of their 2013 exemption, Manchester applied for, and were granted an Article 4 direction in 2019, which covers the city centre's commercial core and other strategic sites, making them exempt from PDR conversions. The driving factors for seeking an Article 4 included concerns over protecting the city's development as the regional centre, the negative impacts on

employment areas (loss of office space), the quality of the accommodation provided and the and the permanence of the regime, which was initially introduced as temporary measure. The cost to the local authority was also a secondary concern.

The resulting conversions in the city from the introduction of extended PDR were viewed as problematic, creating the wrong type of housing in the wrong locations, with poor quality residential accommodation being created in areas that the authority wanted to retain for employment and office space. Although there is a housing crisis the city has an established residential strategy which balances out what is needed for economic growth in a strategic way, a way which conflicts with the influx of one to two-bedroom units being provided by PDR, which isn't realistically what the city needs in particular areas. PDR conversions were not seen as opportunities to deliver new homes in the city and were seen to undermine longer term approaches to sustainable development, appropriate space standards and place-making strategies in Manchester.

The motivation for an Article 4 direction came from the local authority, including neighbourhood regeneration and strategic development teams, as well as politicians, local communities, investors and even developers. There was strong leadership in the city and very little kickback during the consultation process. Although the evidence base for the proposal took around 12 months to compile, it was seen as a worthwhile endeavour in order to protect the city and to pursue the right type of growth. The support for the Article 4 direction was unilateral and the exemption was pursued to facilitate a longer-term view of how Manchester should continue to develop in the most strategic and appropriate way – including minimising impacts of PDR.

There is a need to balance demands in Manchester, as there aren't many voids in the residential market and the office market is also in high demand, with burgeoning developments and low vacancy rates in the city centre, where there is consistently high demand for grade A office space. However, although most of the city's experience with PDR has been through office-to-residential conversions these have typically been converted by small to medium sized developers with smaller buildings, rather than larger investment driven national companies. For Manchester, as a regional centre, there is more certainty with the latter than the former, and larger developers weren't pursuing PDR (and provided support for the exemption). When discussing PDR, the only advantage the local authority could see was to the developer, or landlord, in possession of vacant buildings.

Another conflict arising from PDR developments was the nature of the space being created by these SME developers, many of which circumvent the city's space standards. Documents on residential quality guidance were compiled in recent years to provide detail on expectations regarding developments, setting out quality standards and a comprehensive holistic perspective on developments. This isn't an SPD but will be embedded into the new local plan. The city encourages developers to adopt national space standards, or those applied in London, whichever is greater, with the expectation that developers will be able to clearly justify the spaces they are creating. PDR conversions avoid this process, with the smallest conversion the local authority is aware of amounting to units of only 15 metres squared, which falls substantially below any recommended space standards by a significant margin.

Such conversions also result in a lack of contribution from the developer through S106, and although Manchester is not a CIL authority this may be something which will change in the future. With the majority of PD developments seen as creating conversions of poor quality, which don't meet space standards or contribute to S106, the conversions are potentially creating slum housing. The local authority has also had very little capacity to reject or push back against prior approval's, although they have refused on grounds relating to noise, and the criteria for objecting (highways, flooding) are seen as insufficient and difficult to apply. Manchester declared a climate emergency in 2019, and PDR is broadly seen as the wrong approach to delivering sustainable and quality housing.

From the local authority's point of view there are no advantages to the PDR regime when considering the impacts in Manchester. The extended permitted development rights are seen to promote a narrow view of the housing market and economy, without appropriate consideration of the implications for the local markets more broadly moving forward. The local authority has concerns

over the negative impact PDR has on sustainable development. PDR is not seen to be achieving sustainable goals and although there is need to address the housing crisis, the extension of PDR is not seen locally as the solution to this nor as something that has contributed positively to Manchester overall. The overall view is that Article 4 directions have mediated the impacts of a PDR regime which is seen to have no advantages for the local authority.

Assessing quality: site visits

Table 30, presents a summary of the data collected on our site visits in Manchester. Key findings are that:

- In Manchester, there were 36 prior approval and 6 planning permission schemes noted and visited. Of the prior approval schemes, the majority (31) were office-to-resi conversions, there were 4 retail/sui-generis and 1 light industrial to office conversions. Of the planning permissions, 4 were office-to-resi conversions and the other 3 were retail/sui-generis-to-resi.
- 69% of the prior approval schemes and 100% planning permission schemes had been converted.
- Many of the prior approval schemes have obvious notable alterations, suggesting applicants are securing change of use through prior approval and then going back to planning for smaller external alterations (see Figure 31). As we would expect, a higher proportion of schemes with planning permission have made these external alterations.
- Prior approval schemes appear (on the basis of observation only) to have marginally better obvious accessibility to local shops/services, public transport and open/green space than planning permission schemes (see Figure 32). Due to small numbers of planning permission schemes, it is difficult to draw any robust conclusions or speculate as to why this might be the case, although given most of the schemes converted through planning permission were in residential areas, this might provide some indication.
- Very few additional facilities appear to be provided in conversion schemes through either route in Manchester, but provision for waste/refuse and mail delivery appears to be better in planning permission schemes (Figure 33).

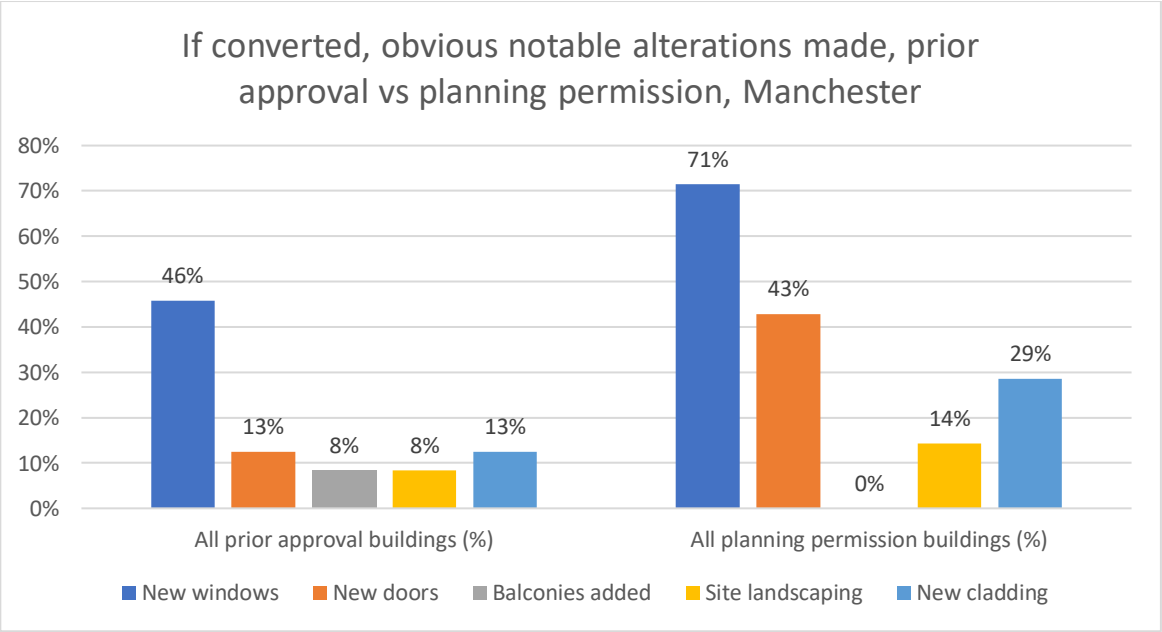

Figure 31: Obvious notable alterations made, prior approval vs planning permission, Manchester

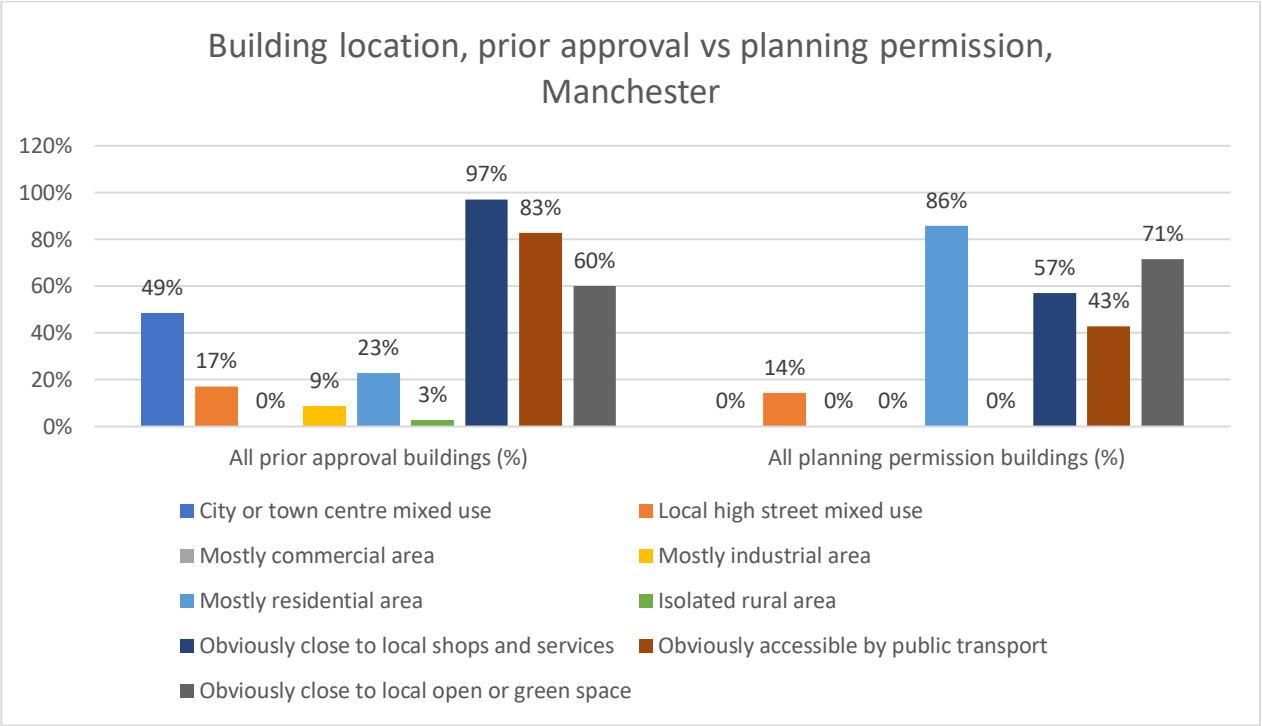

Figure 32: Building location and accessibility, prior approval vs planning permission, Manchester

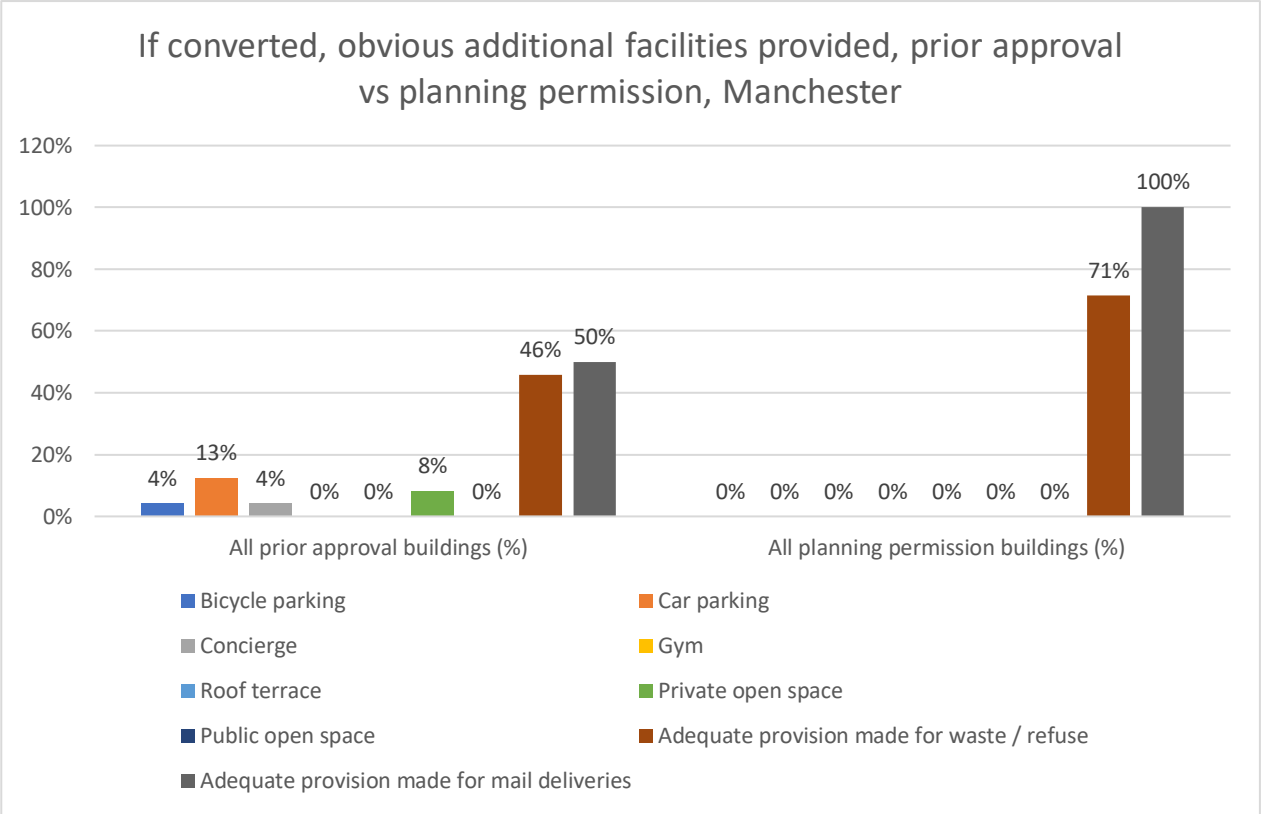

Figure 33: Obvious additional facilities provided, prior approval vs planning permission, Manchester

Table 30: Results of site visits in Manchester

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	32	3	1	**36**	3	3	0	**6**
Current state:								
Conversion not started - vacant business premises	6%	0%	0%	**6%**	0%	0%	N/A	**0%**
Conversion not started - partially occupied business premises	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Conversion not started - fully occupied business premises	6%	33%	0%	**8%**	0%	0%	N/A	**0%**
Conversion in progress	13%	0%	0%	**11%**	0%	0%	N/A	**0%**
Conversion completed - vacant residential unit(s)	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Conversion completed - occupied residential unit(s)	59%	33%	100%	**58%**	100%	100%	N/A	**100%**
Unclear	16%	33%	0%	**17%**	0%	0%	N/A	**0%**
Converted (total)	72%	33%	100%	**69%**	100%	100%	N/A	**100%**
Building original use:								
Residential single dwelling	9%	33%	0%	**11%**	67%	0%	N/A	**33%**
Residential apartment building	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Office building pre-WWII	13%	0%	0%	**11%**	0%	0%	N/A	**0%**
Office building 1950s-70s	25%	0%	0%	**22%**	0%	0%	N/A	**0%**
Office building 1980s-present	22%	0%	0%	**19%**	0%	0%	N/A	**0%**
Warehouse or light industrial building pre-WWII	9%	0%	0%	**8%**	0%	0%	N/A	**0%**
Warehouse or light industrial building post-WWII	3%	0%	100%	**6%**	0%	0%	N/A	**0%**
Light industrial ground floor / residential above	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Retail building pre-WWII	3%	0%	0%	**3%**	0%	67%	N/A	**33%**
Retail building post-WWII	0%	67%	0%	**6%**	0%	0%	N/A	**0%**
Retail ground floor / residential above	13%	0%	0%	**11%**	0%	33%	N/A	**17%**
Unclear	3%	0%	0%	**3%**	33%	0%	N/A	**17%**
Average building height (number of floors)	3.3	2.3	2.0	**3.2**	2.0	2.0	N/A	**2.0**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	13%	100%	100%	**20%**	0%	67%	N/A	**33%**
3-9 units	22%	0%	0%	**20%**	33%	33%	N/A	**33%**
10-29 units	17%	0%	0%	**16%**	0%	0%	N/A	**0%**
30 units +	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Unclear	48%	0%	0%	**44%**	67%	0%	N/A	**33%**
If converted, obvious notable alterations made:								
New windows	43%	100%	100%	**48%**	67%	67%	N/A	**67%**
New doors	9%	0%	100%	**12%**	33%	67%	N/A	**50%**
Balconies added	9%	0%	0%	**8%**	0%	0%	N/A	**0%**
Site landscaping	4%	0%	100%	**8%**	0%	33%	N/A	**17%**
New cladding	4%	100%	100%	**12%**	0%	67%	N/A	**33%**
If converted, obvious additional facilities provided:								
Bicycle parking	4%	0%	0%	**4%**	0%	0%	N/A	**0%**
Car parking	9%	0%	100%	**12%**	0%	0%	N/A	**0%**
Concierge	4%	0%	0%	**4%**	0%	0%	N/A	**0%**
Gym	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Roof terrace	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Private open space	9%	0%	0%	**8%**	0%	0%	N/A	**0%**
Public open space	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Adequate provision made for waste / refuse	43%	100%	100%	**48%**	100%	33%	N/A	**67%**
Adequate provision made for mail deliveries	48%	100%	100%	**52%**	100%	100%	N/A	**100%**
Building location:								
City or town centre mixed use	53%	0%	0%	**47%**	0%	0%	N/A	**0%**
Local high street mixed use	13%	67%	0%	**17%**	0%	33%	N/A	**17%**
Mostly commercial area	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Mostly industrial area	9%	0%	0%	**8%**	0%	0%	N/A	**0%**
Mostly residential area	25%	33%	0%	**25%**	100%	67%	N/A	**83%**
Isolated rural area	0%	0%	100%	**3%**	0%	0%	N/A	**0%**
Not answered	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Researchers impression on location:								
Obviously close to local shops and services	97%	100%	0%	**94%**	33%	100%	N/A	**67%**
Obviously accessible by public transport	81%	100%	0%	**81%**	33%	67%	N/A	**50%**
Obviously close to local open or green space	53%	100%	100%	**58%**	100%	67%	N/A	**83%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 20 implemented conversion schemes in Manchester are illustrated by Table 31, below.

Table 31: Results of desk based analysis for Manchester

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	11	2	1	**14**	3	3	0	**6**
Permission for change of use:								
Prior approval - one only	82%	100%	100%	**86%**	0%	0%	N/A	**0%**
Prior approval - multiple	9%	0%	0%	**7%**	0%	0%	N/A	**0%**
Planning permission - one only	0%	0%	0%	**0%**	100%	67%	N/A	**83%**
Planning permission - multiple	0%	0%	0%	**0%**	0%	33%	N/A	**17%**
Both prior approval and planning permission	10%	0%	0%	**7%**	0%	0%	N/A	**0%**
Prior approval with associated planning permission	80%	0%	0%	**57%**	N/A	N/A	N/A	**N/A**
Number of units created	365	3	1	**369**	4	5	N/A	**9**
Average number of units per scheme	33.9	1.5	1	**26.4**	1.33	1.67	N/A	**1.5**
Unit sizes:								
Studio flats	45%	0%	0%	**45%**	0%	0%	N/A	**0%**
One bedroom flats	43%	0%	0%	**43%**	0%	0%	N/A	**0%**
Two bedroom flats	8%	0%	0%	**8%**	0%	0%	N/A	**0%**
Three or more bedroom flats	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Maisonette or house	1%	33%	100%	**1%**	100%	100%	N/A	**100%**
Units complying with national space standards	18%	33%	100%	**18%**	100%	0%	N/A	**44%**
Units with access to private amenity space	4%	0%	100%	**4%**	25%	100%	N/A	**67%**
Buildings with access to communal amenity space	55%	0%	0%	**43%**	33%	0%	N/A	**17%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Only skylights or rooflights	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Only facing an atrium	5%	0%	0%	**5%**	0%	0%	N/A	**0%**
Single aspect	84%	0%	0%	**83%**	50%	100%	N/A	**78%**
Single aspect / north facing only	13%	0%	0%	**13%**	0%	0%	N/A	**0%**
Dual or triple aspect windows	12%	33%	100%	**12%**	50%	0%	N/A	**22%**
EPC rating:								
A	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
B	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
C	45%	0%	0%	**36%**	33%	33%	N/A	**33%**
D	18%	0%	0%	**14%**	67%	33%	N/A	**50%**
E	18%	0%	0%	**14%**	0%	33%	N/A	**17%**
F	0%	50%	100%	**14%**	0%	0%	N/A	**0%**
G	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Unclear	18.2%	50%	0%	**21.4%**	0%	0%	N/A	**0%**
Council tax:								
A	18%	0%	0%	**14%**	67%	100%	N/A	**83%**
B	18%	0%	0%	**14%**	33%	0%	N/A	**17%**
C	9%	50%	0%	**14%**	0%	0%	N/A	**0%**
D	9%	0%	0%	**7%**	0%	0%	N/A	**0%**
E	9%	0%	0%	**7%**	0%	0%	N/A	**0%**
F	0%	0%	100%	**7%**	0%	0%	N/A	**0%**
G	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
H	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Unclear	36.4%	50%	0%	**35.7%**	0%	0%	N/A	**0%**
GIS Analysis:								
Average Index Multiple deprivation	2.60	2.00	5.00	**2.69**	1.00	2.00	N/A	**1.43**
Average Access to Public Green Space score	4.10	3.00	9.00	**4.31**	4.80	1.30	N/A	**3.30**
Walking distance to small supermarket	91%	100%	0%	**86%**	33%	100%	N/A	**67%**
Walking distance to large supermarket	91%	100%	0%	**86%**	33%	100%	N/A	**67%**
Walking distance to a bus stop	*Data not available*							
Walking distance to a rail station	91%	50%	0%	**79%**	100%	67%	N/A	**83%**

The desk based research is based on an analysis of the following prior approval schemes:

- *1, 3 & 5 West Street, Manchester; 102 Manchester Road, Chorlton, Manchester; 133 Sandyhill Road, Manchester; 206 Mauldeth Road, Burnage, Manchester; 30 Rippingham Road, Withington, Manchester; 35 Houldsworth Street, Manchester; 8-14 St Ann's Square, Manchester; Artillery House, 15 Byrom Street, Manchester; 121 Princess Street, Manchester; Globe House, 30-34 Southall Street,*

Manchester; Outram House, Piccadilly Village, Great Ancoats Street, Manchester; Salisbury House, Granby Row, Manchester; Samuel House, St Chads Street, Cheetham, Manchester; Storage Building, Underwood Mill Lane, Woodhouse Park, Manchester

And the following planning permission schemes:

- *1 Cardale Walk, Manchester; 1 Forber Crescent, Gorton, Manchester; 204-206 Lightbowne Road, Manchester; 23 Reddish Lane, Gorton, Manchester; 60 Lloyd Street South, Manchester; 934-938 Ashton New Road, Clayton, Manchester*

In Manchester, the comparison between PD and full planning permission units presents a rather mixed picture. The most striking indicator is compliance with National Space Standards: just 18% of the 369 units created through the PD route met this indicator, compared with 44% of the units created through a full planning permission. Similarly, only 4% of the PD units had access to private amenity space compared to 67% of the full planning permission units. Planning permission units were also less likely to be studio or one-bedroom apartments.

The schemes going through full planning permission were, however, in more deprived neighbourhood according to the Index of Multiple Deprivation data analysis, with worth access to supermarkets. This may explain the similarity in the Council Tax banding data between the two routes. The window arrangements and EPC performance were also similar between both routes. As with most local authorities, the number average unit sizes and total number of units being examined were much smaller through the full planning permission than the PD route.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 14m^2 in 35 Houldsoworth Street and there was also 15m^2 in Salisbury House. The mean average of the smallest unit found in each prior approval scheme examined in Manchester was 75.8m^2. The smallest unit found in a planning permission scheme was the 45.6m^2 in 60 Lloyd Street. The mean average of the smallest unit found in each planning permission scheme examined in Manchester was 107.8m^2. We found one unit allowed through prior approval which did not appear to have a window at all at Outram House; a subsequent planning application was then granted for alterations which would add a window for this unit, albeit this faces a brick wall about 2m away so would not have much of an outlook.

Conclusions

Manchester has seen a much lower rate of change of use schemes than might perhaps be expected, but then has had areas of exemption ever since 2013. This has tended to mean PD conversion schemes have been seen just outside the core city centre, in more deprived neighbourhoods, and may explain the poor quality seen with a number of schemes, with a low compliance with space standards and provision of amenity space, and notably fewer external alterations made than those going through the planning permission route. It might also explain a slightly lower prevalence of schemes compared to Bristol (without Article 4 directions), although overall higher economic prosperity may also help drive more schemes in Bristol.

Appendix 7: Case Study Seven – Richmond

Introduction and planning context

Richmond is an outer London borough to the south west of Greater London, incorporating the historic centres of Richmond and Twickenham and a large area of suburban housing stretching along the River Thames to Hampton Court. It is classified as a 'major urban' authority, but includes a number of large open spaces such as Richmond and Bushy Parks.

As part of Greater London, the same *London Plan* policies apply in Richmond as in Enfield (already discussed). The current London Plan allocates 315 homes per annum to Richmond for 2015-25.[90]

The *Local Plan* for the London Borough of Richmond upon Thames was adopted in July 2018.[91] Residential quality of life is emphasized strongly in the plan as part of the strategic vision for the future of the borough, which states that it "will be the best place in London to live as a result of the quality of the built environment which considers the health and wellbeing of local residents and the high quality design of new development that respects and enhances its distinctive character. The amenity of residents and local neighbourhoods will have been protected".[92] Policy LP1 in the plan requires all development to be of high architectural and urban design quality.

Policy LP8 looks to ensure development protects the amenity and living conditions of new development, but also adjoining and neighbouring existing properties, with particular requirements about daylight and sunlight, overlooking and noise. Policy LP35, on housing mix and standards, looks for family sized housing to be included in developments, for compliance with the nationally described space standard, for adequate external and amenity space, and for 90% of new build housing to meet Building Regulation Requirement M4(2) on accessible and adaptable dwellings and 10% to meet Requirement M4(3) on wheelchair user dwellings.

Policy LP36 seeks 50% of housing units to be affordable provision, with on-site provision expected for schemes of ten units or more and a financial contribution for smaller sites. Interestingly, there is an explicitly stated provision of affordable housing for developments on former employment sites (which is higher than for sites where there is no loss of employment floorspace). The plan also contains policies to try and prevent the loss of office floorspace in all parts of the borough (policy LP41) and industrial land (policy LP42).

Richmond has a standing Design Review Panel.[93] They also have an extensive collection of supplementary planning documents and guidance.[94] An *Affordable Housing Supplementary Planning Document* was adopted in March 2014 and the contribution strategy stated here depends not just on the size of the development scheme, but also the current/former use of the site (i.e. where it was employment floorspace or land now becoming housing or not).[95] A *Design Quality Supplementary Planning Document* was adopted in February 2006.[96] A *Small and Medium Housing*

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[90] 'The London Plan' at https://www.london.gov.uk/sites/default/files/the_london_plan_2016_jan_2017_fix.pdf
[91] 'Local Plan' at https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf
[92] Ibid page 10
[93] 'Richmond Design Review Panel' at https://www.richmond.gov.uk/services/planning/richmond_design_review_panel
[94] 'Supplementary planning documents and guidance' at https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/supplementary_planning_documents_and_guidance
[95] 'Affordable Housing SPD' at https://www.richmond.gov.uk/media/11597/affordable_housing_spd_2014v2.pdf
[96] 'Design Quality SPD' at https://www.richmond.gov.uk/media/7624/spd_design_quality_doc_lowres-2.pdf

Sites Supplementary Planning Document was also adopted in February 2006.[97] A *Residential Development Sites Supplementary Planning Document* was adopted in March 2010.[98] This includes guidance around achieving good design, sunlight and daylight, privacy, amenity / garden / play space, internal space and layout, accessibility, parking, landscaping, refuse and recycling, and energy and sustainability.

The borough's *Community Infrastructure Levy Charging Schedule* was adopted in November 2014.[99] Alongside this, a *Planning Obligations Supplementary Planning Document* was published to take effect at the same time.[100] Alongside affordable housing, this document places a particular emphasis on site-specific transport requirements and on public realm, open space and play facilities.

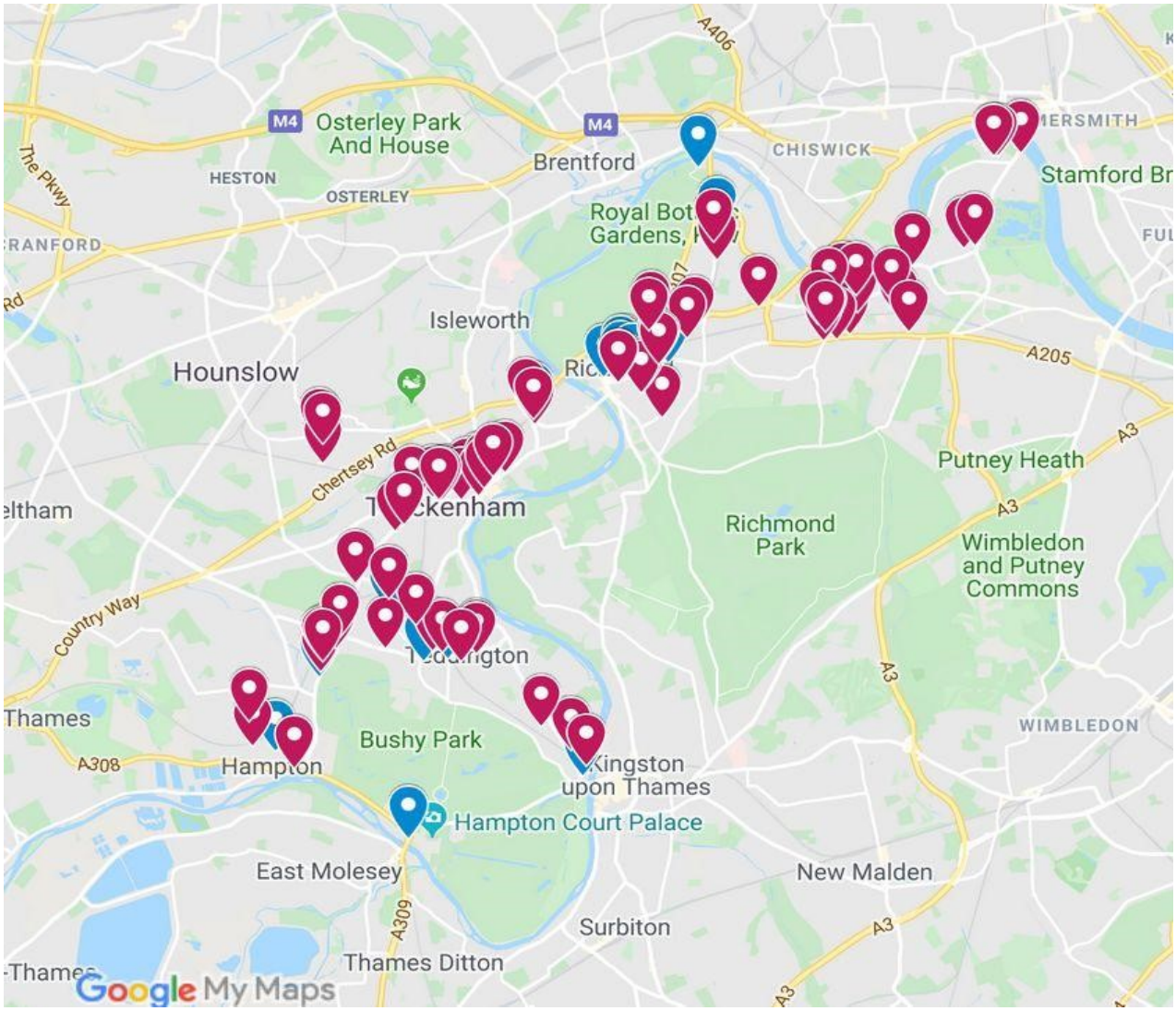

Figure 34: Map illustrating change of use schemes through both the PD and FPA routes in Richmond, 2015-2018 (Source: UCL research team, on a Google Maps base map)

[97] 'Small and Medium Housing Sites SPD' at https://www.richmond.gov.uk/media/7632/spd_small_and_medium_housing_sites.pdf
[98] 'Residential Development Standards SPD' at https://www.richmond.gov.uk/media/7629/spd_residential_development_standards_2010_final_version_30_11_10.pdf
[99] 'CIL Charging Schedule' at https://www.richmond.gov.uk/media/11605/cil_charging_schedule.pdf
[100] 'Planning Obligations SPD' at https://www.richmond.gov.uk/media/11608/planning_obligations_spd_july_2014.pdf

Richmond has had an Article 4 Direction in place since November 2014 to remove permitted development rights to change office to residential use for various specified sites around the borough. A second Article 4 Direction relating to office-to-residential change of use came into force in October 2016 and added further areas to those from the 2014 article.[101] Figure 34 is a map illustrating change of use schemes through both the PD and FPA routes in Richmond, 2015-2018.

Local housing and real estate market

Richmond upon Thames is one of the more affluent local authorities in our case studies, with only 2.6% of the population in the lowest three deciles of multiple deprivation, compared to 73% in the highest three deciles. The area has a reasonably low unemployment rate at 3.5% with a job density just above the national average at 0.86, and one of the highest levels of economically active residents (55.1%). House prices in the local authority are the highest across all case studies, with a house price to earnings ratio of 14.77. However, these prices do not dissuade transactions, as although transactions have decreased by -34.5% in the last five years, transaction volumes for the last decade sit at 82.9%. Vacancy rates are low in both the office (2.9%) and retail (1.3%) markets, and there is strong occupier demand for space in both sectors, with limited supply of new office space coming onto the market, and no new retail supply.

Local authority views

Given the high residential values and property prices in Richmond, and the nature of employment in the borough which is concentrated in smaller scale offices in town centres - rather than on industrial or business parks - the local authority has been concerned since the introduction of office-to-residential PD in 2013 about the loss of offices and employment in the borough and the inability to secure affordable housing. Richmond originally sought exemption from office-to-residential PD but was unsuccessful. The borough immediately went down the route of getting an Article 4 in place, but it took time. The first Article 4 came into effect in November 2014, covering individual employment sites only. The second Article 4 expanded coverage, including town centres, and came into effect in 2016.

The local authority estimates that approximately 30% of the employment floorspace it had in 2013 has been lost, emphasising that the quantum of floorspace was always relatively low. The local authority has received numerous phone calls from occupiers of business units and offices, including charitable groups, who have reported that their landlords are refusing to extend their tenancies and that they have nowhere else to go. The loss of employment floorspace, business rates, and the impact on the affordability of remaining commercial stock, has been the issue of greatest concern for the local authority and the previous (Conservative) Leader of the Council was very vocal on this issue. An internal paper published in 2016 showed that a third of Prior Approval schemes were fully occupied as employment space at the time of application, 20% were partially occupied and only 44% were wholly vacant. Relatively speaking, Richmond has not, as yet, been impacted as much by storage/industrial or retail-to-residential conversions under PD. Concern about the impact of further office-to-residential conversions has also diminished due to the introduction of the Article 4 direction, as well as a rebalancing of office and residential values, which has made offices more viable.

Planning officers acknowledged that one clear advantage of the introduction of PD rights in Richmond has been that it has helped the borough to meet housing targets set by the Mayor, which have risen again in the new London Plan. Meeting housing targets has always been challenging for Richmond, since the majority of the borough is covered by either Metropolitan Open Land or conservation area designation and there are no big housing sites, so they have always relied on housing coming forward on small sites. Having said that, Council officers, on balance, did not believe

[101] 'Article 4 Directions – Office to Residential' at https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/article_4_directions_offices_to_residential

that an unmanaged, unplanned approach to delivering housing was beneficial for the borough, emphasising that there was no impact on infrastructure, transport, education or health provision. The Council also normally seeks financial contributions for affordable housing provision for housing schemes smaller than 10 units, which it is missing out on under PD.

The quality of housing coming forward through prior approval was of significant concern to officers in development management. On the one hand, they are fighting hard to get residential space and design standards in place, but on the other, PD is forcing a significant number of flats through the system that do not meet these standards, which they suggested was undermining their own policies. They reported, and showed floorplans of, schemes coming through prior approval that had no windows at all, windows onto small alleyways, very small residential units or poorly designed units without any amenity space, many of which would contravene overlooking or daylight/sunlight policy standards and many coming forward in what they considered to be unsustainable locations.

Officers had strong views on the impact on resourcing. Although extending PD rights is intended to free up valuable council officer time to concentrate on larger applications, officers felt it ended up still being a significant amount of work. They emphasised it is not just about the processing time of the application itself, but the whole process is leading to local opposition, which generates a lot of letters, all at a cost to the local authority rather than the applicant. Officers also emphasised the resourcing implications of the Article 4 process, where the local authority is responsible for justifying the proposed Article 4 direction, commissioning or preparing evidence to support the case, then sending notifications, putting up site notices, managing consultation responses, taking it through the democratic process within the Council. They also pointed to the fact that the time limits on deciding Prior Approvals (56 days) means that resources are often diverted away from the planning application workload to Prior Approvals, in other words prioritising a process where applicants pay almost nothing over the full planning application process where applicants pay a planning fee (and possibly also pay for pre-application advice). This is causing frustration amongst residents and councillors who complain that full planning schemes are being delayed going through planning committee.

Assessing quality: site visits

Table 32 presents a summary of the data collected on our site visits in Richmond. Our key findings from these are:

- Despite Richmond having an Article 4 in place protecting some sites since 2014, the authority has still seen relatively large numbers of prior approvals; 84 in total, of which the majority (72) are office-to-resi conversions, 6 are retail/sui-generis-to-resi and 6 are light industrial-to-resi. Over the same time period, there have been 19 conversions through planning permission, 9 office-to-resi, 10 retail/sui-generis-to-resi and 0 light-industrial-to-resi.
- **Conversion rates** for prior approval are slightly higher at 74%, compared to planning permission at 68%.
- Confirming what we know anecdotally, the majority of conversions are small in scale, 56% of prior approval conversions and 54% of planning permission ones are of 1-2 units, 21% and 31% are of 3-9 units respectively, and 10% and 8% are of 10-29 units respectively. There are no large office block conversions providing more than 30 dwellings in Richmond, reflecting the typology of the built environment.
- **Location and accessibility** of schemes going through prior approval and planning permission appear quite similar (see Figure 35).
- Although neither prior approval nor planning permission schemes were providing much in terms of additional facilities, notably none of the prior approval conversions were securing bicycle parking (from external observation), whereas 14% of the planning permission schemes secured this (Figure 36).

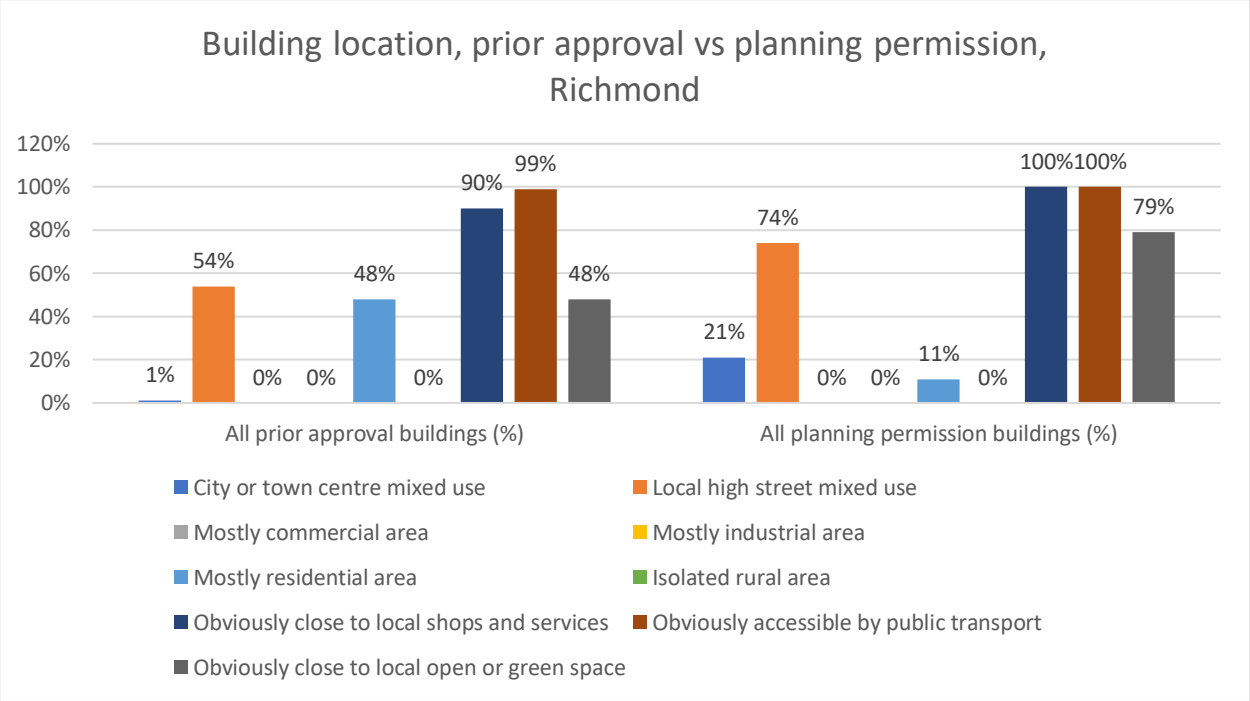

Figure 35: Building location and accessibility, prior approval vs planning permission, Richmond

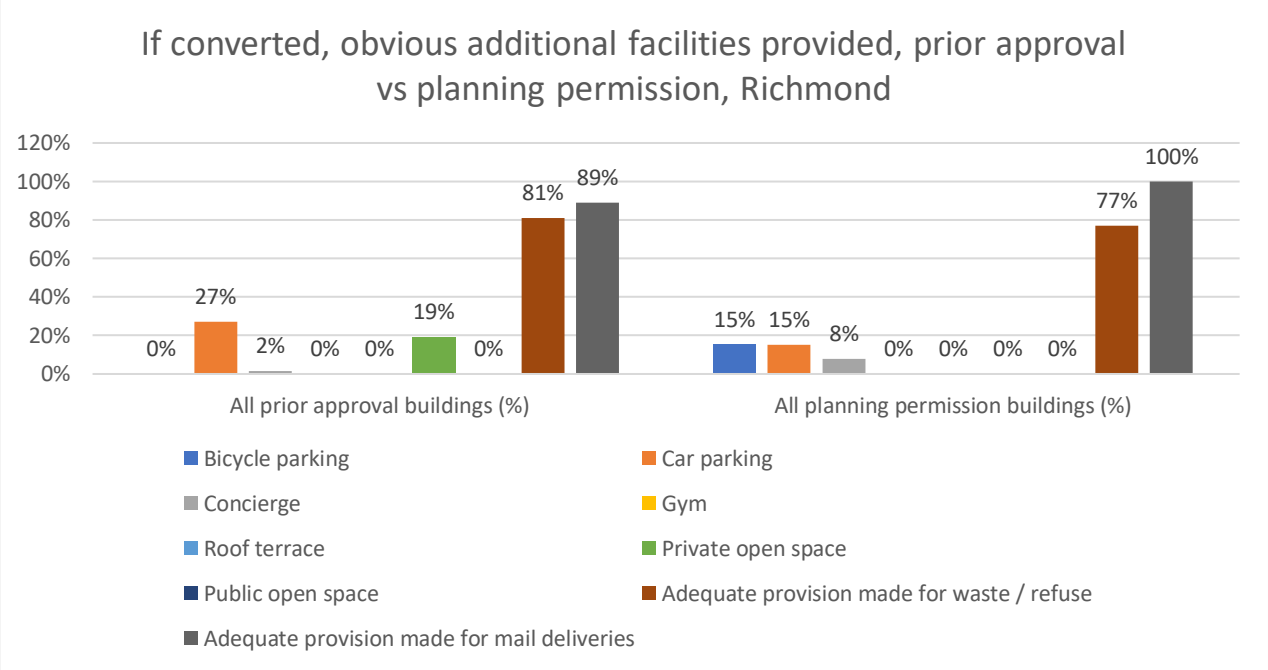

Figure 36: Obvious additional facilities provided, prior approval vs planning permission, Richmond

Table 32: Results of site visits in Richmond

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	72	6	6	**84**	9	10	0	**19**
Current state:								
Conversion not started - vacant business premises	8%	0%	0%	**7%**	0%	10%	N/A	**5%**
Conversion not started - partially occupied business premises	10%	0%	0%	**8%**	11%	10%	N/A	**11%**
Conversion not started - fully occupied business premises	8%	17%	0%	**8%**	11%	10%	N/A	**11%**
Conversion in progress	7%	0%	33%	**8%**	11%	0%	N/A	**5%**
Conversion completed - vacant residential unit(s)	14%	0%	0%	**12%**	0%	10%	N/A	**5%**
Conversion completed - occupied residential unit(s)	51%	67%	67%	**54%**	56%	60%	N/A	**58%**
Unclear	1%	17%	0%	**2%**	11%	0%	N/A	**5%**
Converted (total)	72%	67%	100%	**74%**	67%	70%	N/A	**68%**
Building original use:								
Residential single dwelling	46%	50%	33%	**45%**	44%	50%	N/A	**47%**
Residential apartment building	8%	17%	0%	**8%**	33%	0%	N/A	**16%**
Office building pre-WWII	6%	0%	0%	**5%**	0%	0%	N/A	**0%**
Office building 1950s-70s	4%	0%	0%	**4%**	0%	0%	N/A	**0%**
Office building 1980s-present	10%	0%	0%	**8%**	11%	0%	N/A	**5%**
Warehouse or light industrial building pre-WWII	4%	0%	50%	**7%**	0%	0%	N/A	**0%**
Warehouse or light industrial building post-WWII	6%	17%	0%	**6%**	0%	0%	N/A	**0%**
Light industrial ground floor / residential above	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Retail building pre-WWII	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Retail building post-WWII	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Retail ground floor / residential above	17%	17%	0%	**15%**	11%	50%	N/A	**32%**
Unclear	0%	0%	17%	**1%**	0%	0%	N/A	**0%**
Average building height (number of floors)	2.6	2.6	2.5	**2.6**	2.9	2.7	N/A	**2.8**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	54%	75%	67%	**56%**	50%	57%	N/A	**54%**
3-9 units	23%	25%	0%	**21%**	17%	43%	N/A	**31%**
10-29 units	12%	0%	0%	**10%**	17%	0%	N/A	**8%**
30 units +	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Unclear	12%	0%	33%	**13%**	17%	0%	N/A	**8%**
If converted, obvious notable alterations made:								
New windows	63%	100%	67%	**66%**	67%	57%	N/A	**62%**
New doors	60%	100%	50%	**61%**	50%	43%	N/A	**46%**
Balconies added	6%	0%	0%	**5%**	0%	0%	N/A	**0%**
Site landscaping	25%	0%	0%	**21%**	50%	0%	N/A	**23%**
New cladding	31%	50%	17%	**31%**	33%	14%	N/A	**23%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	0%	**0%**	17%	14%	N/A	**15%**
Car parking	31%	0%	17%	**27%**	33%	0%	N/A	**15%**
Concierge	2%	0%	0%	**2%**	17%	0%	N/A	**8%**
Gym	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Roof terrace	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Private open space	21%	25%	0%	**19%**	0%	0%	N/A	**0%**
Public open space	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Adequate provision made for waste / refuse	81%	100%	67%	**81%**	100%	57%	N/A	**77%**
Adequate provision made for mail deliveries	90%	100%	67%	**89%**	100%	100%	N/A	**100%**
Building location:								
City or town centre mixed use	1%	0%	0%	**1%**	11%	30%	N/A	**21%**
Local high street mixed use	49%	67%	67%	**51%**	67%	70%	N/A	**68%**
Mostly commercial area	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Mostly industrial area	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Mostly residential area	50%	33%	33%	**48%**	22%	0%	N/A	**11%**
Isolated rural area	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Not answered	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Researchers impression on location:								
Obviously close to local shops and services	89%	100%	100%	**90%**	100%	100%	N/A	**100%**
Obviously accessible by public transport	99%	100%	100%	**99%**	100%	100%	N/A	**100%**
Obviously close to local open or green space	47%	50%	50%	**48%**	89%	70%	N/A	**79%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 30 implemented conversion schemes in Richmond are illustrated by Table 33, below.

Table 33: Results of desk based analysis for Richmond

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	10	4	6	**20**	5	5	0	**10**
Permission for change of use:								
Prior approval - one only	60%	75%	50%	**60%**	0%	0%	N/A	**0%**
Prior approval - multiple	0%	25%	0%	**5%**	0%	0%	N/A	**0%**
Planning permission - one only	0%	0%	0%	**0%**	100%	60%	N/A	**80%**
Planning permission - multiple	0%	0%	0%	**0%**	0%	20%	N/A	**10%**
Both prior approval and planning permission	40%	0%	50%	**35%**	0%	20%	N/A	**10%**
Prior approval with associated planning permission	40%	0%	50%	**35%**	N/A	N/A	N/A	**N/A**
Number of units created	98	8	15	**121**	38	11	N/A	**49**
Average number of units per scheme	9.8	2	2.5	**6.05**	7.8	2.3	N/A	**4.9**
Unit sizes:								
Studio flats	8%	25%	13%	**10%**	3%	0%	N/A	**2%**
One bedroom flats	37%	25%	87%	**42%**	24%	9%	N/A	**20%**
Two bedroom flats	53%	50%	0%	**46%**	66%	55%	N/A	**63%**
Three or more bedroom flats	1%	0%	0%	**1%**	0%	27%	N/A	**6%**
Maisonette or house	1%	0%	0%	**1%**	8%	9%	N/A	**8%**
Units complying with national space standards	69%	50%	60%	**67%**	95%	91%	N/A	**94%**
Units with access to private amenity space	8%	25%	87%	**19%**	3%	73%	N/A	**18%**
Buildings with access to communal amenity space	10%	0%	0%	**5%**	20%	20%	N/A	**20%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Only skylights or rooflights	2%	0%	0%	**2%**	0%	0%	N/A	**0%**
Only facing an atrium	9%	0%	0%	**7%**	0%	0%	N/A	**0%**
Single aspect	55%	50%	33%	**52%**	13%	0%	N/A	**10%**
Single aspect / north facing only	0%	0%	13%	**2%**	0%	0%	N/A	**0%**
Dual or triple aspect windows	45%	50%	67%	**48%**	87%	100%	N/A	**90%**
EPC rating:								
A	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
B	0%	0%	0%	**0%**	0%	20%	N/A	**10%**
C	40%	50%	50%	**45%**	40%	20%	N/A	**30%**
D	30%	50%	17%	**30%**	20%	40%	N/A	**30%**
E	0%	0%	0%	**0%**	20%	0%	N/A	**10%**
F	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
G	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
Unclear	30%	0%	33.3%	**25%**	20%	20%	N/A	**20%**
Council tax:								
A	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
B	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
C	20%	50%	0%	**20%**	20%	20%	N/A	**20%**
D	20%	25%	50%	**30%**	20%	20%	N/A	**20%**
E	10%	0%	0%	**5%**	20%	20%	N/A	**20%**
F	10%	0%	0%	**5%**	0%	0%	N/A	**0%**
G	0%	0%	0%	**0%**	0%	0%	N/A	**0%**
H	10%	0%	0%	**5%**	20%	0%	N/A	**10%**
Unclear	30%	25%	50%	**35%**	20%	40%	N/A	**30%**
GIS Analysis:								
Average Index Multiple deprivation	9.00	8.90	8.90	**8.95**	8.90	9.00	N/A	**8.95**
Average Access to Public Green Space score	2.00	1.80	1.80	**1.90**	1.90	1.90	N/A	**1.90**
Walking distance to small supermarket	70%	100%	100%	**85%**	100%	80%	N/A	**90%**
Walking distance to large supermarket	30%	75%	100%	**60%**	60%	80%	N/A	**70%**
Walking distance to a bus stop	100%	100%	100%	**100%**	100%	100%	N/A	**100%**
Walking distance to a rail station	90%	100%	100%	**95%**	100%	100%	N/A	**100%**

The desk based research is based on an analysis of the following prior approval schemes:

- *132 Heath Road, Twickenham; 136 Heath Road, Twickenham; 158 Upper Richmond Road West, London; 1a St Leonards Road, London; 1b Evelyn Road, Richmond; 2-3 Stable Mews, Twickenham; 2-6 Bardolph Road, Richmond; 23 Hampton Road, Twickenham; 23 Priory Road, Hampton; 2a Ferry Road, London; 34-36 High Street, Whitton, Twickenham; 38-42 Hampton Road, Teddington; 42*

Glentham Road, London; 52-54 Glentham Road, London; 67-69 Strathmore Road, Teddington; Burnham House, 4 Archer Mews, Hampton; Garrick House, 161-163 High Street, Hampton; The Lodge, 69 The Green, Twickenham; Unit 1, Plough Lane, Teddington; Vision House, 3 Dee Road, Richmond

And the following planning permission schemes:

- *1 London Road, Twickenham; 144 Heath Road, Twickenham; 204 Stanley Road, Teddington; 32-34 Paradise Road, Richmond; 5 Royal Parade, Richmond; 6, 8 & 10 High Street, Hampton Wick; 6 Old Lodge Place, Twickenham; 63 Kew Green, Kew; 90 Kew Road, Richmond; Queens House, 2 Holly Road, Twickenham*

The GIS data for Richmond shows that both PD and planning permission units are generally in very prosperous neighbourhoods, with excellent access to public green space, public transport and supermarket shops. This reflects the general character of the borough. The Council Tax banding and EPC ratings for both PD and full planning permission schemes here are broadly similar. Access to amenity space indicators are also broadly similar for both full planning permission and PD schemes (quite low in both cases).

A difference does emerge, however, in respect to compliance with Nationally Described Space Standards, where 67% of the 121 PD units considered meet these. Whilst this is higher than some other local authorities considered, it is significantly below the 94% of planning permission units meeting this standard. Similarly, 52% of the PD units have only single aspect windows, compared to 10% of the planning permission units (and there are two PD units which only had daylight via a skylight / rooflight alone). Given the number of schemes and units considered for both routes (a total of 121 units created in 20 schemes through PD, and 49 units created in 10 schemes through full planning permission), the difference between these two quality indicators for the two routes in Richmond can be considered significant.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 27m^2 in 2-3 Stable Mews. The mean average of the smallest unit found in each prior approval scheme examined in Richmond was 73.0m^2. The smallest unit found in a planning permission scheme was the 37m^2 in 1 London Road. The accompanying planning officer report notes that this is space standard compliant. The mean average of the smallest unit found in each planning permission scheme examined in Richmond was 87.8m^2.

Conclusions

There have been a high number of change of use schemes, through both routes, in Richmond, doubtless reflecting high housing demand. On site visits, both PD and FPA schemes tended to be in similar sort of locations, and generally highly accessible to shops and services and by public transport. In general, slightly more prior approval schemes actually had visible alterations to the exterior than planning permission schemes. Access to amenity space was similar in both, as was EPC rating. There was a notable difference in terms of window arrangements and national space standards, however, with planning permission units performing much more strongly against both. That said, with 67% of Richmond's PD units meeting national space standards, performance here (whilst well below the 94% of planning permission units) is noticeably better than any other case study. This is likely linked to the high property prices and economic performance of this area, meaning developers feel there is greater profitability through higher quality conversions.

Appendix 8: Case Study Eight – Sandwell

Introduction and planning context

Sandwell is a metropolitan borough unitary authority in the West Midlands. Located to the west of Birmingham and south of Wolverhampton, this major urban authority includes the historic towns of Oldbury, Rowley Regis, Smethwick, Tipton, Wednesbury, and West Bromwich. This polycentric borough is primarily urban, with extensive areas of suburban housing and an industrial heritage.

Sandwell is in the area covered by the West Midlands Combined Authority, which is headed by a directly elected Mayor. The combined authority has the ability to create a regional spatial development strategy, although there is no public information about a plan being under preparation. There is work underway looking at housing supply and land availability.[102]

The current local plan for Sandwell is provided by the *Black Country Core Strategy*, which is a joint document between Dudley, Sandwell, Walsall and Wolverhampton Councils and was adopted in February 2011.[103] Work on a replacement *Black Country Plan* is underway.[104] The currently adopted plan includes policy DEL2 on managing the balance between employment land and housing and an objective for land to be provided to deliver at least 63,000 net additional homes across the area between 2006-2026, with 95% of this new housing to be built on previously developed land. The plan seeks to secure 25% affordable housing on all sites of 15 dwellings or more where this is financially viable.

A *Revised Residential Design Guide* SPD was adopted in January 2014.[105] The document is structured around the themes of 'integration into the neighbourhood', 'creating a place' and 'street and home'. This includes suggestions such as that walking distances to public transport connections should be no greater than 320-400 metres in higher density areas and 560-700 metres in lower density locations and that private amenity space is provided. External and internal space standards are specified. External storage and amenity space is encouraged, and waste storage requirements specified.

The Council adopted a CIL charging schedule in April 2015.[106] They have not adopted any Article 4 directions in relation to the change of use of commercial buildings to residential use. Figure 37, below, is a map illustrating change of use schemes through both the PD and FPA routes in Sandwell, 2015-2018.

Local housing and real estate market

Sandwell is one of the more deprived local authorities across our case studies, with 74.2% of the population falling into the three lowest deciles of multiple deprivation. It also has higher rates of unemployment at 5.3%, and a low job density of 0.72. However, housing prices have increased by 33.0% in the last five years, although the house price to earnings ratio has not increased substantially (4.95 in 2012 to 5.9 in 2018), indicating that median earners, if they choose to purchase, still sit in a reasonably affordable housing market. The Birmingham submarket of Sandwell offers affordable office space, and has a number of large public sector occupiers, such as the Council and Sandwell

[102] 'Housing & Land' at https://www.wmca.org.uk/what-we-do/housing-land/
[103] 'Adopted Strategy' at https://blackcountryplan.dudley.gov.uk/t4/p2/
[104] 'Timetable' at https://blackcountryplan.dudley.gov.uk/timetable/
[105] 'Revised Residential Design Guide' at https://www.sandwell.gov.uk/downloads/file/4164/residential_design_guide_spd_2014
[106] 'Sandwell Community Infrastructure Levy' at http://www.sandwell.gov.uk/downloads/file/22228/sandwell_cil_charging_schedule

College. Vacancy rates are low at 1.9% and there is substantially more office space at 3 stars or below (over 3 million square feet), compared to 4 & 5 star prime space (177,686 square feet). The retail market also offers affordable space to the occupier, with vacancy rates of 2.0%.

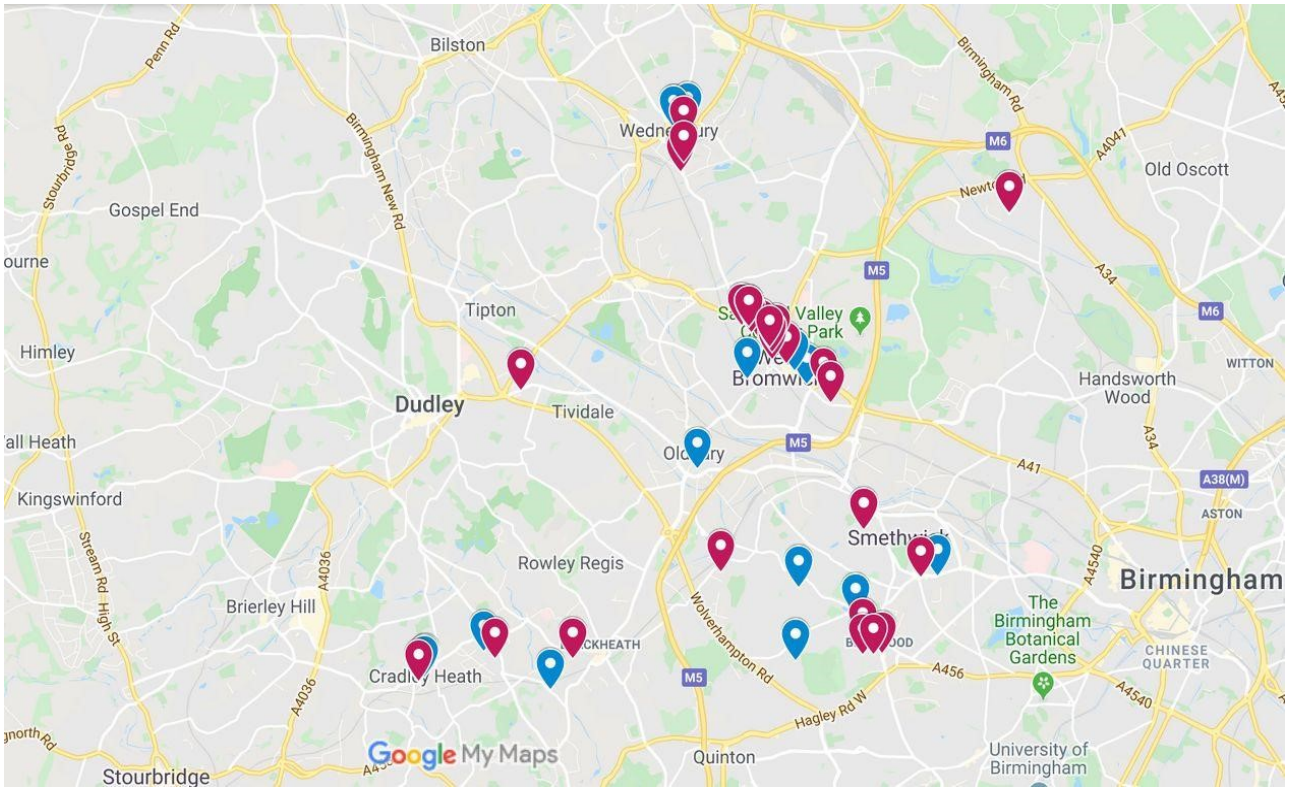

Figure 37: Map illustrating change of use schemes through both the PD and FPA routes in Sandwell, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local authority views

Sandwell saw a significant amount of take up in conversions following the extension of PDR for office to residential use after 2013. There was a high rate of PDR developments coming onto the local market around 2016, specifically in West Bromwich, which has been something of a PDR hotspot due to the suitability of the office buildings available for conversion. The local authority has also seen an increase in retail and sui generis to residential use, but as Sandwell is a post-industrial area with a number of commercially successful industrial areas, the impact of storage and light industrial conversions has been negligible. The key emerging issues in relation to the impact of PDR in Sandwell reflect tensions between the creation of new housing supply and office reuse, broadly seen as advantageous, which is offset by disadvantages surrounding the quality of accommodation provided through PDR. There are also significant concerns around the PDR process itself and apprehension over how the continuing liberalisation and deregulation of the planning system by the government has challenged ideas about what can be perceived as good and appropriate planning.

The local authority welcomes the reuse of more vacant and obsolete office space and see advantage in repurposing underutilised floor space. Much of what has been converted were vacant and no longer meeting demand as they were buildings constructed in the 1960s and 1970s and aren't comparable to contemporary office standards. Although this reuse through PDR has impacted the office offer in Sandwell, this isn't seen as problematic as it is an over supplied market, where the limited demand for office space is adequately met through new, modern construction. Due to the nature of the office market the local authority sees no justification for an Article 4 on safeguarding offices. However, the possibility of applying for an Article 4 direction has been discussed by council members and related agencies with regard to the changing character of certain areas in the authority, combined with concerns regarding the tenancy and management of the end developments created by PDR. Retail and sui generis conversions on local high streets are also acceptable across the local

authority, although there are no hotspots for this type of PDR, unlike the West Bromwich office market.

The local authority is happy to accommodate change of use and some alternative uses may not have happened without the introduction of extended PDR, but generally these would have been more appropriately determined via a full planning application. There have been larger scale developments which have ended up contributing to the PRS and creating additional housing, however a number of these have issues regarding both management and building quality and there are perceived to have been no high end or luxury conversions. Sandwell is a relatively deprived borough, and many of the PDR schemes are small, one-bedroom units marketed at lower income earners or those in receipt of benefits, with certain schemes associated with pressing social issues. For those converting the spaces themselves, providing an acceptable living spaces doesn't seem to be paramount in terms of developer priorities, nor does contributing towards amenities.

In terms of enforcement or challenges to the living spaces created, planning has its hands tied due to lack of control and the reliance on other agencies, such as building control, to respond to concerns regarding the standard of PDR provided. There is legislation, such as the Housing Act, which can actively respond to issues with management companies and those leasing the accommodation when they are raised – but these are on completed developments, not those in the early stages. At the beginning of the process for prior approvals, Sandwell were unable to consider issues such as noise and lack of information, to mitigate the potentially negative impacts of PDR (these were then addressed through later legislative changes).

For the local authority the loss of planning application fees is seen as problematic. It was felt that if PDR applications were to progress through the full planning process, many of them would be granted consent but with more stringent consideration and encouragement of higher internal and amenity space standards, and associated conditions such as cycle and bin storage. The cost for applications varies, from £96 for a prior approval to £462 per unit via a full planning application. As it stands developers operationalising PDR conversions are using the more flexible, less restrictive regime as it represents an easy financial win for them. However, for the local authority itself the fiscal impact is exacerbated due to the amount of time and resources which are interpreting the PDR process and making robust decisions. The interpretation of the prior approval processes is reflected in a burgeoning case law, but it can be subjective, and can create uncertainties on both the sides of the planners / local authority and the applicant. Again, the question over whether the government wants quality planning or fast planning is reiterated by local planners.

In Sandwell overall it isn't the principle of the conversions that is questioned, but the quality of the outcomes produced, combined with questions over whether PDR is providing an appropriate basis for decision making over typical planning applications. PDR is viewed as having resulted in the emergence of an increasingly unwieldy and uncertain process, where the costs to the local authority, community and housing markets, often outweigh any positive impacts of the regime. The view was that PDR is challenging and diminishing what can be considered as good quality and appropriate planning mechanisms.

Assessing quality: site visits

Table 34 presents a summary of the data collected on our site visits in Sandwell. Our key findings are that:

- In Sandwell, there were 26 prior approval schemes and 17 planning permission schemes visited. 21 of the prior approvals were office-to-resi and 5 were retail/sui generis-to-resi. Of the planning permission schemes, the majority (12) were retail/sui generis, with a small number of office-to-resi (2) and light industrial-to-resi (3) conversions going down this route.
- A higher proportion of the prior approval schemes (65%) had been implemented than the planning permission schemes (53%).

- Converted schemes through prior approval include some larger schemes than through planning permission (see Figure 38). Whereas more than half of converted schemes (both routes) were very small (1-2 units), prior approval seems to be facilitating some larger conversions with 3 (18%) schemes having between 10-29 dwelling units and 1 (6%) scheme over 30 units. There were no larger conversions that secured change of use through planning permission, suggesting prior approval is the preferred route for securing change of use in larger schemes.
- No notable observed differences between prior approval and planning applications for accessibility to services, provision of additional facilities (Figure 39 and Table 34).

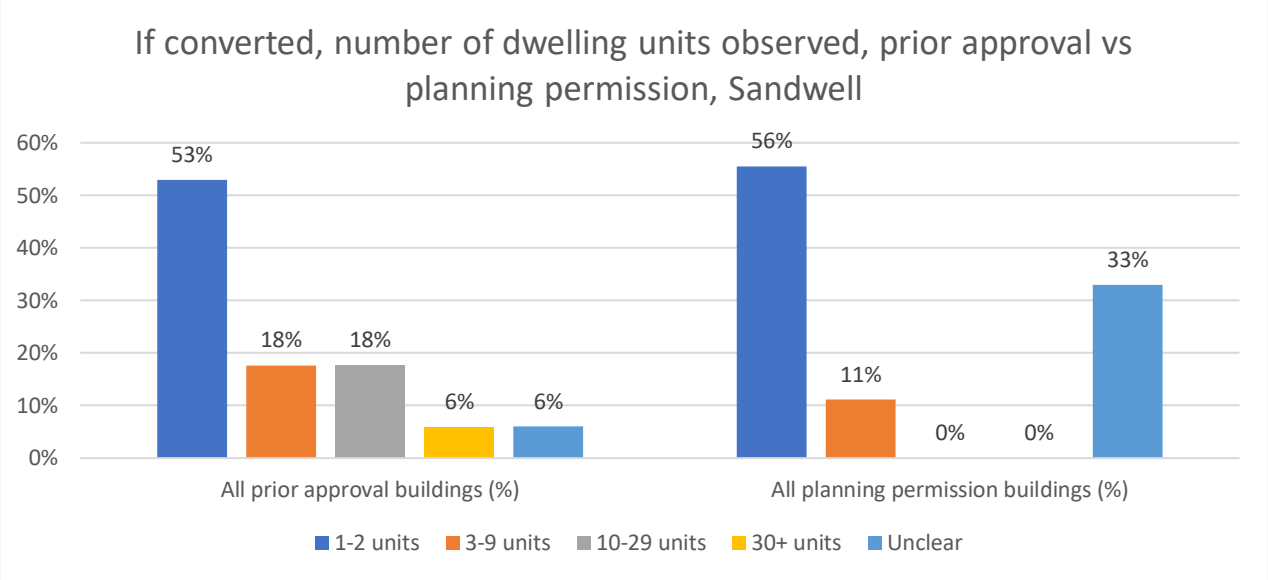

Figure 38: Number of dwellings observed in converted schemes, prior approval vs planning permission, Sandwell

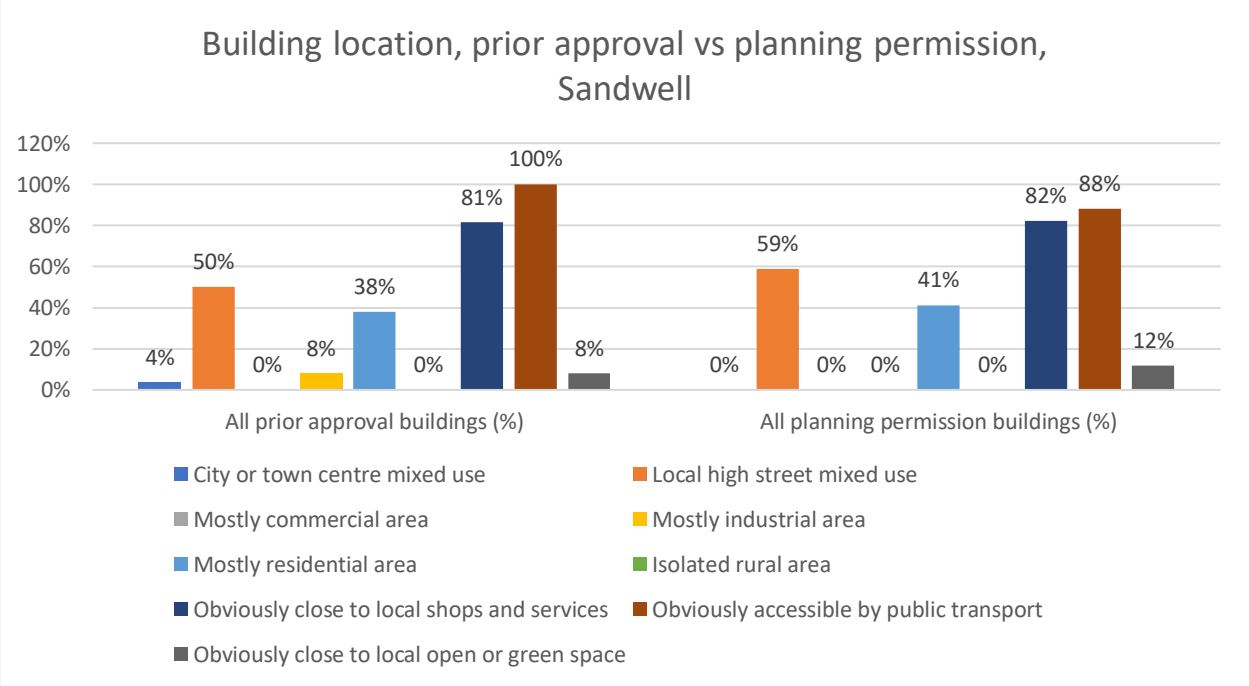

Figure 39: Building location and accessibility, prior approval vs planning permission, Sandwell

Table 34: Results of site visits in Sandwell

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	21	5	0	**26**	2	12	3	**17**
Current state:								
Conversion not started - vacant business premises	10%	0%	N/A	**8%**	50%	0%	0%	**6%**
Conversion not started - partially occupied business premises	14%	20%	N/A	**15%**	0%	8%	33%	**12%**
Conversion not started - fully occupied business premises	0%	0%	N/A	**0%**	0%	0%	33%	**6%**
Conversion in progress	5%	0%	N/A	**4%**	50%	8%	0%	**12%**
Conversion completed - vacant residential unit(s)	10%	0%	N/A	**8%**	0%	8%	0%	**6%**
Conversion completed - occupied residential unit(s)	52%	60%	N/A	**54%**	0%	50%	0%	**35%**
Unclear	10%	20%	N/A	**12%**	0%	25%	33%	**24%**
Converted (total)	67%	60%	N/A	**65%**	50%	67%	0%	**53%**
Building original use:								
Residential single dwelling	33%	60%	N/A	**38%**	100%	67%	67%	**71%**
Residential apartment building	10%	0%	N/A	**8%**	0%	0%	0%	**0%**
Office building pre-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Office building 1950s-70s	14%	0%	N/A	**12%**	0%	0%	0%	**0%**
Office building 1980s-present	14%	0%	N/A	**12%**	0%	0%	0%	**0%**
Warehouse or light industrial building pre-WWII	0%	0%	N/A	**0%**	0%	0%	33%	**6%**
Warehouse or light industrial building post-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Light industrial ground floor / residential above	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Retail building post-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Retail ground floor / residential above	29%	40%	N/A	**31%**	0%	33%	0%	**24%**
Unclear	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Average building height (number of floors)	2.5	2.5	N/A	**2.5**	3.5	2.5	2.0	**2.2**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	50%	67%	N/A	**53%**	0%	63%	N/A	**56%**
3-9 units	14%	33%	N/A	**18%**	0%	13%	N/A	**11%**
10-29 units	21%	0%	N/A	**18%**	0%	0%	N/A	**0%**
30 +units	7%	0%	N/A	**6%**	0%	0%	N/A	**0%**
Unclear	7%	0%	N/A	**6%**	100%	25%	N/A	**33%**
If converted, obvious notable alterations made:								
New windows	86%	100%	N/A	**88%**	0%	88%	N/A	**78%**
New doors	36%	67%	N/A	**41%**	0%	50%	N/A	**44%**
Balconies added	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Site landscaping	0%	33%	N/A	**6%**	0%	13%	N/A	**11%**
New cladding	14%	33%	N/A	**18%**	0%	63%	N/A	**56%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Car parking	29%	33%	N/A	**29%**	0%	38%	N/A	**33%**
Concierge	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Gym	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Roof terrace	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Private open space	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Public open space	0%	0%	N/A	**0%**	0%	0%	N/A	**0%**
Adequate provision made for waste / refuse	64%	100%	N/A	**71%**	0%	75%	N/A	**67%**
Adequate provision made for mail deliveries	79%	100%	N/A	**82%**	0%	100%	N/A	**89%**
Building location:								
City or town centre mixed use	0%	20%	N/A	**4%**	0%	0%	0%	**0%**
Local high street mixed use	57%	20%	N/A	**50%**	100%	67%	0%	**59%**
Mostly commercial area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Mostly industrial area	10%	0%	N/A	**8%**	0%	0%	0%	**0%**
Mostly residential area	33%	60%	N/A	**38%**	0%	33%	100%	**41%**
Isolated rural area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Not answered	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	81%	80%	N/A	**81%**	100%	83%	67%	**82%**
Obviously accessible by public transport	100%	100%	N/A	**100%**	100%	92%	67%	**88%**
Obviously close to local open or green space	0%	40%	N/A	**8%**	50%	0%	33%	**12%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 20 implemented conversion schemes in Sandwell are illustrated by Table 35, below.

Table 35: Results of desk based analysis for Sandwell

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	9	3	0	**12**	1	6	1	**8**
Permission for change of use:								
Prior approval - one only	78%	33%	N/A	**67%**	0%	0%	0%	**0%**
Prior approval - multiple	11%	33%	N/A	**17%**	0%	0%	0%	**0%**
Planning permission - one only	0%	0%	N/A	**0%**	0%	33%	100%	**38%**
Planning permission - multiple	0%	0%	N/A	**0%**	100%	0%	0%	**13%**
Both prior approval and planning permission	11%	33%	N/A	**17%**	0%	67%	0%	**50%**
Prior approval with associated planning permission	11%	33%	N/A	**17%**	N/A	N/A	N/A	**N/A**
Number of units created	108	52	N/A	**160**	4	13	5	**23**
Average number of units per scheme	12	17.33	N/A	**13.33**	4	2.17	5	**2.88**
Unit sizes:								
Studio flats	11%	2%	N/A	**8%**	0%	15%	0%	**9%**
One bedroom flats	56%	81%	N/A	**64%**	0%	38%	80%	**41%**
Two bedroom flats	31%	17%	N/A	**26%**	100%	38%	20%	**45%**
Three or more bedroom flats	1%	0%	N/A	**1%**	0%	0%	0%	**0%**
Maisonette or house	2%	0%	N/A	**1%**	0%	8%	0%	**5%**
Units complying with national space standards	44%	56%	N/A	**48%**	0%	85%	40%	**59%**
Units with access to private amenity space	3%	0%	N/A	**2%**	25%	46%	0%	**32%**
Buildings with access to communal amenity space	0%	0%	N/A	**0%**	0%	17%	100%	**25%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Only skylights or rooflights	0%	0%	N/A	**0%**	0%	0%	20%	**5%**
Only facing an atrium	27%	0%	N/A	**18%**	0%	8%	0%	**5%**
Single aspect	69%	79%	N/A	**72%**	0%	15%	0%	**9%**
Single aspect / north facing only	1%	0%	N/A	**1%**	0%	8%	0%	**5%**
Dual or triple aspect windows	31%	21%	N/A	**28%**	100%	92%	80%	**91%**
EPC rating:								
A	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
B	0%	0%	N/A	**0%**	100%	17%	0%	**25%**
C	0%	0%	N/A	**0%**	0%	17%	0%	**13%**
D	67%	67%	N/A	**67%**	0%	33%	100%	**38%**
E	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Unclear	33.3%	33.3%	N/A	**33.3%**	0%	33.3%	0%	**25%**
Council tax:								
A	44%	67%	N/A	**50%**	100%	33%	100%	**50%**
B	11%	0%	N/A	**8%**	0%	17%	0%	**13%**
C	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
D	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
E	0%	0%	N/A	**0%**	0%	17%	0%	**13%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
H	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Unclear	44.4%	33.3%	N/A	**41.7%**	0%	33.3%	0%	**25%**
GIS Analysis:								
Average Index Multiple deprivation	2.30	2.50	N/A	**2.35**	1.00	3.40	3.00	**3.05**
Average Access to Public Green Space score	3.40	3.50	N/A	**3.43**	4.00	4.10	4.00	**4.08**
Walking distance to small supermarket	78%	67%	N/A	**75%**	100%	67%	100%	**75%**
Walking distance to large supermarket	78%	67%	N/A	**75%**	100%	67%	100%	**75%**
Walking distance to a bus stop	100%	100%	N/A	**100%**	100%	100%	100%	**100%**
Walking distance to a rail station	100%	33%	N/A	**83%**	100%	50%	0%	**50%**

The desk based research is based on an analysis of the following prior approval schemes:

- *1-2 St Michaels Court, Victoria Steet, West Bromwich; 12 Lombard Street, West Bromwich; 21 St Marys Road, Smethwick; 312-314 High Street, West Bromwich; 40 Gorse Farm Road, Great Barr, Birmingham; 416 High Street, West Bromwich; 5 Barrs Street, Oldbury; 81 Birmingham Road, West*

Bromwich; 83-84 High Street, Cradley Heath; 393-395 High Street, West Bromwich; Priest House, 14 Priest Street, Cradley Heath; Thynne Court, Thynee Street, West Bromwich

And the following planning permission schemes:

- *132 High Street, West Bromwich; 162 Abbey Road, Smethwick; 170 Thimblemill Road, Smethwick; 30-30A Gorse Farm Road, Great Barr, Birmingham; Boat Inn, 141 Station Road, Cradley Heath; 17 Church Square, Oldbury; Former Cape Hill Brewery Pump House, Cape Hill, Smethwick; The Lamp, 18 Upper High Street, Wednesbury*

There are a range of different PD and full planning permission schemes which have been considered in Sandwell. The average scheme size for PD schemes is larger, primarily driven by office-to-residential conversions. The PD schemes are in more deprived neighbourhood locations, but with slightly better access to public green space. Accessibility to supermarkets and bus public transport is similar for both routes, and the PD schemes have better accessibility to rail transport. Taken together, this all suggests that both types of scheme are in broadly similar neighbourhood locations.

Sandwell had the smallest difference between the percentage of PD units meeting NDSS (48%) and the percentage of planning permission units meeting these (58%). The difference of 11 percentage points is smaller than for any of our other LPA considered in this research (the largest difference was 69 percentage points in Bristol). From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 17m^2 in 81 Birmingham Road. The mean average of the smallest unit found in each prior approval scheme examined in Sandwell was 39.8m^2, which is indicative of the large quantity of small units created through PD in the locality. The smallest unit found in a planning permission scheme was the 40.4m^2 in The Lamp, 18 Upper High Street. The mean average of the smallest unit found in each planning permission scheme examined in Sandwell was 74.0m^2. The planning permission schemes which fell below the NDSS expectations were generally one- or two-bedroom flats which narrowly missed the standards, but internal space was usually considered in the planning officer reports.

Beyond space standards, the full planning permission schemes are more likely to be two-bedroom schemes, to have access to amenity space, and to have dual aspect windows than the PD schemes in Sandwell, with some dramatic differences on these indicators between the two routes. In relation to window arrangements, there is one full planning-permission scheme which had one unit with only skylights. This is noted in the officer report, however the scheme (in a historic industrial building) was felt to have other merits which balanced this out, and so this is an example where there has been a considered balancing of different elements of the scheme and a stated desire to allow a scheme with less than perfect residential amenity in order to see a derelict building brought back into use.

Conclusions

The implementation rate for PD schemes in Sandwell is higher than planning permission units, and the compliance with the suggested nationally described space standards is around the middle of rates for all our case studies, but with the smallest difference between PD and planning permission units seen. From the exterior, judgements about the quality of conversions done under both routes seem similar. Access to amenity space is, however, much better under planning permission schemes than PD (although at 32%, still not particularly high), and this is particularly important given the low accessibility to public green space in the neighbourhoods were most conversion schemes were located. The window arrangements were much better for planning permission than PD schemes as well. At 17%, the level of prior approvals with an associated planning application also seems low. In general, with a much higher level of deprivation, Sandwell offers a striking contrast to Richmond.

Appendix 9: Case Study Nine – Sunderland

Introduction and planning context

Sunderland is a city and unitary authority in the North East of England. Although a historic town, the urban development primarily reflects the nineteenth century industrial heritage of a shipbuilding, glass and rope making and coal mining area, and with early- and mid-twentieth century suburban development. Within the local authority area is Washington, a new town designated in 1964, the development of which reflects many planning orthodoxies of the era, such as the functional separation of land uses. Sunderland is classified as a major urban authority.

Sunderland is part of the 'North East Combined Authority', which since November 2018 has comprised Durham, Gateshead, South Tyneside and Sunderland local authorities (Newcastle, North Tyneside and Northumberland having left to form the 'North of Tyne Combined Authority'). This combined authority does not have specific spatial planning powers.

The *Core Strategy and Development Plan (2015-2033)*[107] is currently going through the examination process. This will replace the now quite outdated City of Sunderland Adopted Unitary Development Plan 1998.[108] The emerging new local plan calls for at least 745 additional dwellings per year. Policy H1, on housing mix, aims for new development to provide a mix of house types, tenures and sizes and for 10% of dwellings on development of 10 or more units to meet the Building Regulations M4(2) standard on accessible and adaptable dwellings. Policy H2 seeks to have developments or more than ten dwellings to provide at least 15% affordable housing.

As well as a number of more recent design code and design framework supplementary planning documents relating to particular parts of the city, a *Residential Design Guide* SPD was adopted in October 2008.[109] This specifies standards for amenity open space, equipped play space, the spacing of dwellings and various transport issues.

A draft Planning Obligations SPD was published in May 2018.[110] This seeks a 15% affordable housing contribution on developments of ten dwellings or more, as well as open space (green space) provision, equipped play space provision and allotment provision or contributions from developments of ten dwellings or more (alongside a range of case-by-case sought obligations).

Sunderland does not currently have an adopted CIL charging schedule. It also have not adopted any Article 4 directions in relation to the change of use of commercial buildings to residential use.

Figure 40, below, is a map illustrating change of use schemes through both the PD and FPA routes in Sunderland, 2015-2018.

[107] 'Core Strategy and Development Plan' at https://www.sunderland.gov.uk/CSDP

[108] 'Unitary Development Plan' at https://www.sunderland.gov.uk/media/19809/Unitary-Development-Plan/pdf/Unitary_Development_Plan.pdf?m=636470354227970000

[109] 'Residential Design Guide Supplementary Planning Document' at https://www.sunderland.gov.uk/media/19917/Residential-Design-Guide-SPD/pdf/ResidentialDesignGuide_adoptedSPD.pdf?m=636495329654700000

[110] 'Planning Obligations Supplementary Planning Document draft' at https://www.sunderland.gov.uk/media/20405/Draft-Planning-Obligations-Supplementary-Planning-Document-2018-/pdf/Draft_Planning_Obligations_Supplementary_Planning_Document_(2018).pdf?m=636645796615530000

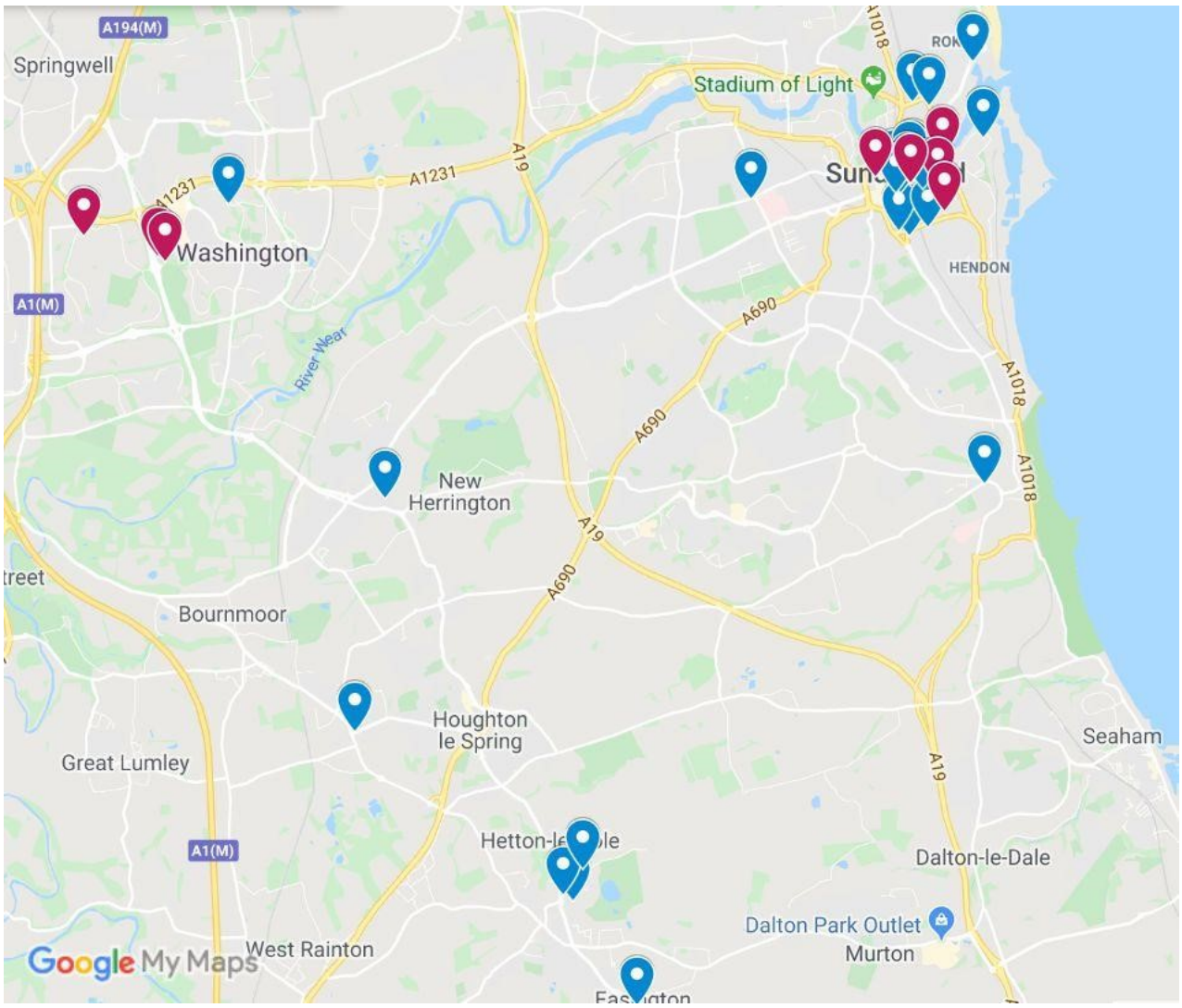

Figure 40: Map illustrating change of use schemes through both the PD and FPA routes in Sunderland,, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local housing and real estate market

Sunderland has the highest unemployment rate across case studies, at 6.9%, and has a below average job density of 0.75. The local authority also has 53.5% of the population within the lowest three deciles of the index of multiple deprivation. However, earnings have been increasing slowly but consistently, and Sunderland is the case study that has seen least change in housing market fundamentals in recent years. The house price to earnings ratio shifted from 4.77 in 2012 to 2.98 in 2018, and the overall growth in house prices has been 8.2% in the last decade, by far the lowest percentage change in all our case studies. The office market offers highly affordable space (especially as an alternative to Newcastle), and is performing well, with over 4 million square feet of space (dominated by almost 3 million square foot of 3 star space), and new space being absorbed consistently. There is over 8 million square feet of retail space in Sunderland, with low vacancy rates of 2.3% and annual rental growth of 1.9%.

Local authority views

Unlike most other local planning officers interviewed, the Sunderland interviewee did not think that permitted development had had that much of a significant impact locally, as there had not been that many prior approvals submitted. There had been some concern about a couple of office-to-

residential schemes because of their location and the nature of the buildings but it was only a couple, with the few others seen generally putting vacant business premises into productive use. There had been some above retail vacant space in the historic part of the city centre where local policy would try to encourage them being put into use and the residential PD had assisted that.

The concerns that had existed locally related to large scale office-to-residential conversions and there had been local member concern as to whether such buildings would really be suitable for residential use with their internal layouts (for example, Angel House), as well as concern as to who might occupy PD schemes (for example being used as temporary accommodation).

Two early prior approvals had been in Washington Town Centre. This is a new town with a shopping centre adjacent to very large car parks with no residential use in the area at all and little amenity for residents. It was in this location that two office blocks were proposed for conversion but residents would be surrounded by car parking but no nearby outdoor space, situated between commercial uses and dual carriageways. This location was felt to be very poor for residential use (the buildings were Weardale House and Derwent House).

The new local plan was examined in summer 2019 and Sunderland are adopting the Nationally Described Space Standards. They have a residential design guide SPD, but it is a decade old and this may be reviewed, dependent on what is produced on design guidance from MHCLG. There is an Article 4 covering HMOs and so there was consideration as to whether one was needed in relation to commercial to residential change of use in any part of the city but officers did not feel there was a strategic problem needing one.

Most schemes are just prior approvals as a stand-alone without an associated planning permission. The planner interviewed understood 'prior approval not required' to mean that the Council were satisfied with all the information submitted and did not ned anything further or any action from the Council whereas if something further had been required then they would use 'prior approval required and granted'.

In Sunderland, the coast is a European Protected Site and the Council do need to consider the ecological impact on this as part of the prior approval process so have had to request additional information on some schemes, such as Gilbridge House, and the applicant had to do an assessment. Conditions have been used in relation to some noise mitigation requirements in some schemes and ground conditions / potential land contamination as well as parking and explosive ordnance. Often these are to cover the eventuality that unexpected land contamination is discovered as a scheme in implemented.

One prior approval has been refused on the basis that its current office use had not been established. No particular Building Control issues had come to the planner's attention in relation to PD schemes and no enforcement action had been taken on any. Section 106s have not been sought on any prior approval schemes, but on relevant planning permission schemes they do try to look at affordable housing contributions, education contributions, play space and sometimes ecological contributions if appropriate. There is no CIL charge adopted locally.

The PD schemes which have been seen locally have involved a range of types of building, scales of development and locations. There have been a variety of applicants and no particular developers stand out. Some schemes have not been implemented, with one (Gilbridge House still in office use and no longer vacant). The implemented schemes have often gone to PRS, but some have also become student accommodation. There had been some pre-Financial Crash interest in conversions in the city centre but these did not them come to fruition and PD apparently then reinvigorate interest in change of use.

Overall, it was felt that there was some beneficial reuse of vacant premises with some buildings but a small number of office-to-residential conversions had caused concern in relation to design and location issues and the local planning authority felt their "hands were tied" over such issues.

Assessing quality: site visits

Table 36 presents a summary of the data collected on our site visits in Sunderland. The key findings from these site visits are:

- In Sunderland, less advantage has been taken of prior approval and the numbers of conversions overall was small. During the time period, there were 8 prior approval conversions, 7 of which were office-to-resi and 1 retail/sui generis-to-resi, whereas there were 30 planning permissions for change of use;15 office-to-resi, 13 retail/sui generis-to-resi and 2 light industrial-to-resi. Conversion rates were similar at 75% for prior approvals and 80% for planning permissions.
- Although both types of schemes were securing additional external alterations, such as new windows and doors, only planning permission schemes were observed to have any additional landscaping (Figure 41). This is consistent with documented frustrations local planning officers have in being unable to secure public realm improvements in prior approval schemes.
- It is difficult to draw conclusions about quality of schemes from the site visits in Sunderland, with similar external appearance and location for both approval routes.
- Marginal difference between planning permission and prior approval schemes in terms of accessibility to shops/services, public transport and open/green space (Figure 42).
- Both types of conversion are lacking in provision of additional facilities, such as car parking, bicycle parking, open space/roof terraces, concierges/gyms, probably reflecting the market, profit margins in schemes and nature of residential demand. Neither prior approval or planning permission schemes were doing notably better in terms of securing adequate provision for waste/refuse or mail deliveries (Table 36).

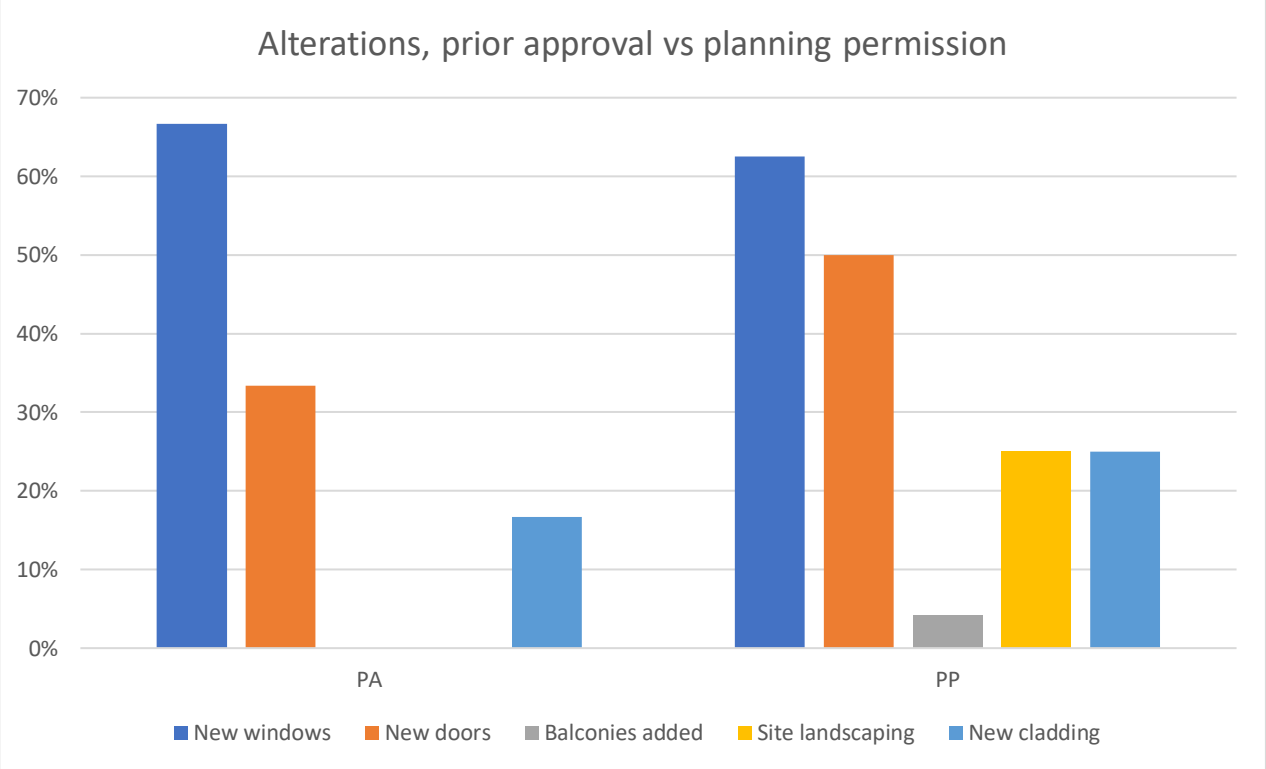

Figure 41: Notable external alterations, prior approval vs planning permission, Sunderland

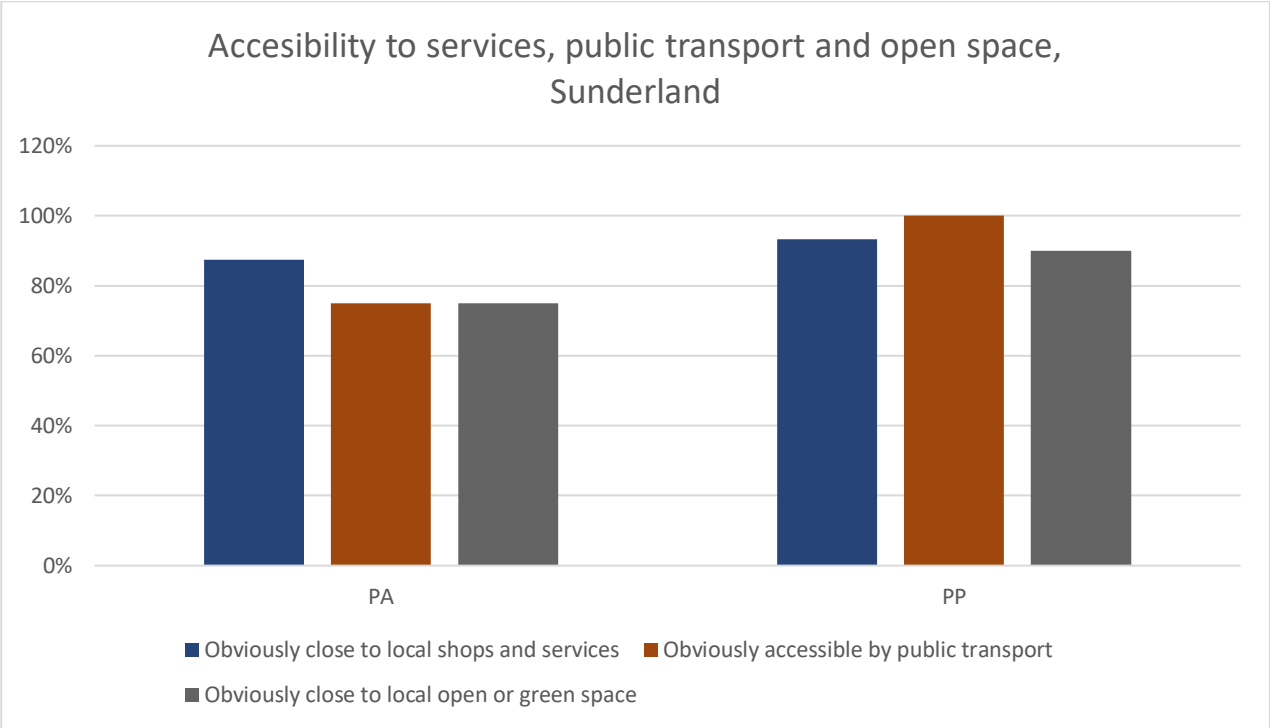

Figure 42: Accessibility to services, public transport and open space, prior approval vs planning permission, Sunderland

Table 36: Results of site visits in Sunderland

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	7	1	0	**8**	15	13	2	**30**
Current state:								
Conversion not started - vacant business premises	14%	0%	N/A	**13%**	7%	23%	0%	**13%**
Conversion not started - partially occupied business premises	0%	0%	N/A	**0%**	7%	0%	0%	**3%**
Conversion not started - fully occupied business premises	14%	0%	N/A	**13%**	0%	8%	0%	**3%**
Conversion in progress	29%	0%	N/A	**25%**	7%	8%	0%	**7%**
Conversion completed - vacant residential unit(s)	14%	0%	N/A	**13%**	53%	0%	0%	**27%**
Conversion completed - occupied residential unit(s)	29%	100%	N/A	**38%**	27%	62%	100%	**47%**
Unclear	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Converted (total)	71%	100%	N/A	**75%**	87%	69%	100%	**80%**
Building original use:								
Residential single dwelling	14%	100%	N/A	**25%**	47%	69%	50%	**57%**
Residential apartment building	0%	0%	N/A	**0%**	7%	0%	0%	**3%**
Office building pre-WWII	14%	0%	N/A	**13%**	0%	8%	0%	**3%**
Office building 1950s-70s	43%	0%	N/A	**38%**	7%	0%	0%	**3%**
Office building 1980s-present	0%	0%	N/A	**0%**	7%	0%	0%	**3%**
Warehouse or light industrial building pre-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Warehouse or light industrial building post-WWII	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Light industrial ground floor / residential above	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	29%	0%	N/A	**25%**	13%	15%	50%	**17%**
Retail building post-WWII	0%	0%	N/A	**0%**	7%	0%	0%	**3%**
Retail ground floor / residential above	0%	0%	N/A	**0%**	13%	8%	0%	**10%**
Unclear	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Average building height (number of floors)	5.0	2.0	N/A	**4.63**	3.0	3.0	3.0	**3.0**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	20%	100%	N/A	**33%**	23%	78%	100%	**50%**
3-9 units	20%	0%	N/A	**17%**	23%	22%	0%	**21%**
10-29 units	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
30+ units	20%	0%	N/A	**17%**	0%	0%	0%	**0%**
Unclear	40%	0%	N/A	**33%**	54%	0%	0%	**29%**
If converted, obvious notable alterations made:								
New windows	60%	100%	N/A	**67%**	38%	89%	100%	**63%**
New doors	20%	100%	N/A	**33%**	31%	78%	50%	**50%**
Balconies added	0%	0%	N/A	**0%**	0%	11%	0%	**4%**
Site landscaping	0%	0%	N/A	**0%**	15%	22%	100%	**25%**
New cladding	20%	0%	N/A	**17%**	15%	44%	0%	**25%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Car parking	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Concierge	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Gym	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Roof terrace	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Private open space	0%	100%	N/A	**17%**	23%	11%	0%	**17%**
Public open space	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Adequate provision made for waste / refuse	40%	100%	N/A	**50%**	38%	22%	0%	**29%**
Adequate provision made for mail deliveries	60%	100%	N/A	**67%**	77%	78%	100%	**79%**
Building location:								
City or town centre mixed use	57%	0%	N/A	**50%**	67%	23%	100%	**50%**
Local high street mixed use	0%	0%	N/A	**0%**	20%	38%	0%	**27%**
Mostly commercial area	14%	0%	N/A	**13%**	0%	0%	0%	**0%**
Mostly industrial area	14%	0%	N/A	**13%**	0%	0%	0%	**0%**
Mostly residential area	14%	100%	N/A	**25%**	13%	38%	0%	**23%**
Isolated rural area	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Not answered	0%	0%	NA	**0%**	0%	0%	0%	**0%**
Researchers impression on location:								
Obviously close to local shops and services	100%	0%	N/A	**88%**	100%	92%	50%	**93%**
Obviously accessible by public transport	71%	100%	N/A	**75%**	100%	100%	100%	**100%**
Obviously close to local open or green space	71%	100%	N/A	**75%**	100%	77%	100%	**90%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 20 implemented conversion schemes in Sunderland are illustrated by Table 37, below.

Table 37: Results of desk based analysis for Sunderland

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	5	1	0	**6**	8	5	1	**14**
Permission for change of use:								
Prior approval - one only	100%	100%	N/A	**100%**	0%	0%	0%	**0%**
Prior approval - multiple	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Planning permission - one only	0%	0%	N/A	**0%**	75%	100%	100%	**86%**
Planning permission - multiple	0%	0%	N/A	**0%**	25%	0%	0%	**14%**
Both prior approval and planning permission	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Prior approval with associated planning permission	0%	0%	N/A	**0%**	N/A	N/A	N/A	**N/A**
Number of units created	216	1	N/A	**217**	39	18	7	**64**
Average number of units per scheme	43.2	1	N/A	**36.2**	4.88	3.6	7	**4.57**
Unit sizes:								
Studio flats	72%	0%	N/A	**72%**	8%	0%	100%	**16%**
One bedroom flats	15%	0%	N/A	**15%**	62%	72%	0%	**58%**
Two bedroom flats	13%	0%	N/A	**13%**	26%	11%	0%	**19%**
Three or more bedroom flats	1%	0%	N/A	**1%**	3%	6%	0%	**3%**
Maisonette or house	0%	100%	N/A	**0%**	3%	11%	0%	**5%**
Units complying with national space standards	29%	100%	N/A	**29%**	95%	100%	0%	**86%**
Units with access to private amenity space	1%	100%	N/A	**1%**	3%	11%	0%	**5%**
Buildings with access to communal amenity space	20%	0%	N/A	**17%**	50%	60%	100%	**57%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Only skylights or rooflights	1%	0%	N/A	**1%**	5%	0%	0%	**3%**
Only facing an atrium	0%	0%	N/A	**0%**	0%	17%	14%	**6%**
Single aspect	67%	0%	N/A	**66%**	49%	50%	100%	**55%**
Single aspect / north facing only	11%	0%	N/A	**11%**	0%	0%	57%	**6%**
Dual or triple aspect windows	33%	100%	N/A	**34%**	51%	50%	0%	**45%**
EPC rating:								
A	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
B	0%	0%	N/A	**0%**	13%	0%	0%	**7%**
C	20%	100%	N/A	**33%**	38%	60%	100%	**50%**
D	20%	0%	N/A	**17%**	13%	0%	0%	**7%**
E	20%	0%	N/A	**17%**	13%	20%	0%	**14%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Unclear	40%	0%	N/A	**33.3%**	25%	20%	0%	**21.4%**
Council tax:								
A	60%	100%	N/A	**67%**	50%	80%	100%	**64%**
B	0%	0%	N/A	**0%**	25%	0%	0%	**14%**
C	0%	0%	N/A	**0%**	13%	0%	0%	**7%**
D	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
E	0%	0%	N/A	**0%**	13%	0%	0%	**7%**
F	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
G	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
H	0%	0%	N/A	**0%**	0%	0%	0%	**0%**
Unclear	40%	0%	N/A	**33.3%**	0%	20%	0%	**7.1%**
GIS Analysis:								
Average Index Multiple deprivation	2.20	1.00	N/A	**2.00**	1.40	2.00	1.00	**1.59**
Average Access to Public Green Space score	4.20	2.00	N/A	**3.67**	3.80	5.25	4.00	**4.33**
Walking distance to small supermarket	60%	100%	N/A	**67%**	88%	80%	100%	**86%**
Walking distance to large supermarket	60%	100%	N/A	**67%**	88%	80%	100%	**86%**
Walking distance to a bus stop	*Data not available*							
Walking distance to a rail station	60%	100%	N/A	**67%**	75%	60%	100%	**71%**

The desk based research is based on an analysis of the following prior approval schemes:

- *27 Tatham Street, Sunderland; Angel House, Borough Road, Sunderland; The Old Vestry, 23 Fawett Street, Sunderland; Units 1-3 Bodlewell House, High Street East, Sunderland; 21 Stanhope Oxclose Washington; Weardale House, Washington Town Centre, Washington*

And the following planning permission schemes:

- *12 Fawcett Street, Sunderland; 13 Grange Terrace, Sunderland; 13 Holmeside, Sunderland; 132 Church Street North, Sunderland; 15-17 John Street, Sunderland; 15 Village Lane, Washington Village, Washington; 18 Fawcett Street, Sunderland; 32a & 32b Nile Street, Sunderland; 40-41 Frederick Street, Sunderland; 67 John Street, Sunderland; 7 Frederick Street, Sunderland; Wesleyan House, Front Street, Hetton-le-Hole, Houghton-le-Spring*

It is noticeable in Sunderland how most conversions have been permitted via a single prior approval or planning permission only. Multiple approvals were very rare, and none of the prior approval schemes examined had an associated planning permission. There may be a link between this and the general viability of development in the locale. The planning permission schemes, of which there were a number to consider in Sunderland, were in slightly more deprived neighbourhoods with worse access to public green space than the PD schemes, however the planning permission schemes have better access to supermarkets and rail public transport.

The window arrangements are generally similar between both routes. It is notable that there are two units created through a planning permission which only have rooflights, however this is discussed in the officer report on the application, which notes that the building is an early nineteenth century lister building, whereby permissible alterations to its fabric are limited, and that it has been vacant for a number of years but would now be brought back into beneficial use, with a number of other indicators of residential quality being met, therefore on balance this would be considered acceptable.

The key difference that is present between the two consenting routes in Sunderland is in relation to unit sizes. The prior approval schemes were much more likely to be studio flats than the planning permission units (72% compared to 16%) and were much less likely to meet the Nationally Described Space Standards (29% compared to 86%). From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 14m^2 in Angel House and there was also 14m^2 in The Old Vestry. The mean average of the smallest unit found in each prior approval scheme examined in Sunderland was 30.6m^2, reflecting the propensity for small studio flat dwellings to be created through PD. The smallest unit found in a planning permission scheme was actually the 14m^2 in 13 Holmeside, however although the proposal is described as a conversion to C3 dwellings, the scheme is actually explicitly intended for student accommodation, and the office report notes that each 'pod' meets the standards set out in the local interim student accommodation policy. The permission also has (like 15-17 John Street) conditions relating to student accommodation (which are not imposed on prior approval schemes, where there is usually no detail about future/intended occupiers). Ignoring this scheme as student accommodation (usually considered a sui generis use), the smallest planning permission unit is the 26m^2 in 40-41 Frederick Street. The mean average of the smallest unit found in each planning permission scheme examined in Sunderland was 55.2m^2.

Conclusions

The implementation rates for both PD and FPA schemes in Sunderland is high. Conversions through both routes are similarly likely to have visible exterior alterations made and both have a low ate of obvious additional amenities provided for residents. Both routes have little access to private amenity space (possibly reflecting the stock of historic buildings converted, apparently often for student accommodation). The PD units have all been implemented without an associated planning permission for further exterior works, and compliance with national space standards is very low (despite the quite high compliance for planning permission units in this same location, offering one of the strongest contrasts from all our case studies). The number of prior approval applications is quite low compared to other case studies, but still second highest in the North East of England region.

Appendix 10: Case Study Ten – Wakefield

Introduction and planning context

Wakefield is a metropolitan unitary authority in Yorkshire and the Humber. It is classified as a 'Significant Rural' authority, the district including the city of Wakefield but also the smaller towns of Normanton, Pontefract, Featherstone, Castleford and Knottingley and surrounding villages. Wakefield's development includes textile industry related buildings from the nineteenth century, whilst Castleford experienced development associated with the coal mining and chemical industries. The district includes a significant amount of green belt land as part of the South and West Yorkshire Green Belt.

Wakefield is part of the West Yorkshire Combined Authority. This does not have spatial planning powers but does include housing and regeneration as a priority area of work.[111]

The current local plan is provided by the *Core Strategy* adopted in April 2009.[112] This plan notes a need for 1,600 new dwellings per annum for 2008-2026. Policy CS6 seeks to ensure all proposals for housing will be of high quality design and help contribute to mixed and balanced communities by providing dwellings of the right size, type, affordability and tenure to meet local needs. An aspiration is expressed for 30% of housing to be affordable. New development is directed to the existing built up areas, with proposals for 15 of more dwellings desired to be within an urban area or local service centre and 6 or more dwellings within a village.

The Initial Draft Local Plan 2036 was published in January 2019.[113] This makes provision for 1,400 additional homes per year. A 30% affordable housing contribution is sought on urban sites where 15 or more dwellings are being delivered and on village sites were ten or more dwellings are being delivered. Policy WSP6 also calls for all proposals for housing to provide a broad mix of homes suitable for different household types.

The *Wakefield District Residential Design Guide* was adopted in January 2018.[114] This includes guidance about space outside the home, open space provision, private outdoor space, accessible and lifetime homes, and floorspace.

A *Community Infrastructure Levy Charging Schedule* was adopted in April 2016.[115] Wakefield does not have any adopted any Article 4 directions in relation to the change of use of commercial buildings to residential use.

Figure 43, below, is a map illustrating change of use schemes through both the PD and FPA routes in Wakefield, 2015-2018.

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[111] 'Priority 4a: Housing and Regeneration' at https://www.westyorks-ca.gov.uk/projects/priority-4a-housing-and-regeneration/

[112] 'Local Development Framework: Core Strategy' at https://www.wakefield.gov.uk/Documents/planning/planning-policy/local-plan/core-strategy/core-strategy.pdf

[113] 'Wakefield District Local Plan 2036' at https://www.wakefield.gov.uk/ldp2036/Initial%20Draft_Volume%201_Development%20Strategy,%20Strategic%20and%20Local%20Policies%20Web%20Copy.pdf

[114] 'Supplementary Planning Documents' at https://www.wakefield.gov.uk/planning/policy/supplementary-documents

[115] 'Wakefield Council CIL Charging Schedule' at https://www.wakefield.gov.uk/Documents/planning/planning-policy/community-infrastructure-levy/2016/cil-charging-schedule-2016.pdf

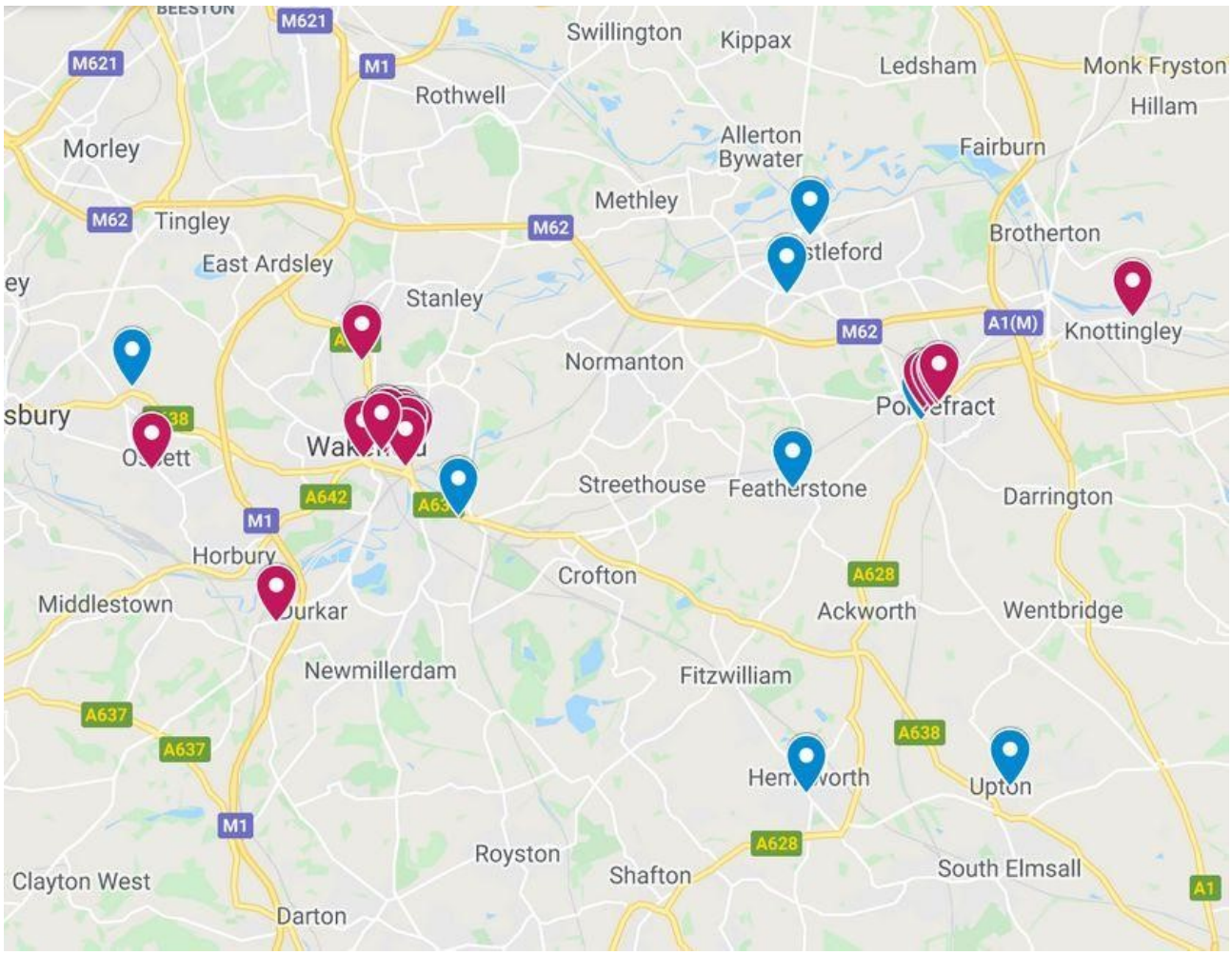

Figure 43: Map illustrating change of use schemes through both the PD and FPA routes in Wakefield, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local housing and real estate market

Wakefield has the lowest percentage of working-age population across the case study areas at 62.1%, with relatively moderate unemployment rates at 4.5% coupled with a job density of 0.79, less than the UK average. House prices have increased across the local authority by 20.3% in the last decade, and in the last year has seen an annual increase of 4.1%, the highest increase across case studies. The house price to earnings ratio however has not significantly changed, moving from 5.22 (2012) to 5.77 (2018), indicating that Wakefield is an affordable location in which to purchase houses. The total office stock in Wakefield has over 3.6 million square feet of space but is one of the smaller submarkets in Leeds, with only 150,087 square feet considered to be prime 4 & 5 star space. There has been no new supply come onto the market in the last year, and vacancy rates currently sit at 2.3%. The retail market has almost seven million square feet of space (almost double that of offices), and has seen more movement in the market in the last year, with new supply, high rates of net absorption, manageable vacancy rates of 2.6% and a 1.6% growth in rental value.

Local authority views

Wakefield has seen 22 prior approvals for office-to-residential conversions in the timescale, but no retail/sui generis or light industrial to residential conversions. As such, the local authority was only able to comment on the impact of office to residential PDR. Prior to PDR, applications for office-to -residential conversions were infrequent. They received applications for conversion of some smaller buildings (1-2 units) but not for the larger office buildings. The PAs they have received have mostly been in Wakefield city centre. The city centre has cheaper rental levels than Leeds (which is only 12

minutes on a direct train), and therefore attracts professionals working in Leeds as well as students from the two Leeds universities.

They consider the quality to be mixed and very much dependent on who the applicant/operator is. There are no dominant operators taking forward multiple schemes in Wakefield. Officers struggle with the idea that they have very little control in shaping a better outcome. The authority has not adopted the national space standards since their local plan has been in place since 2009. However, there are likely to be policies in the new local plan, which goes to examination next year, for adoption in 2021. They do have a residential design guide adopted last year, which was considered long overdue, and it was noted that politicians are keen to address this issue.

The authority did consider there to be some advantages to PD. They pointed to the low fee for the prior approvals as being attractive to applicants and the increased incentives to utilise redundant buildings. It was mentioned that some buildings in Wakefield have been empty for a few years and the city centre has suffered from a downturn in the office market. For example, one city centre office scheme, Merchant Gate, is still empty.

PD was considered to have a neutral impact on housing delivery in Wakefield. The authority already has a five year (+) housing supply and delivery rates are already above target. This was partly due to the site allocation document in the Local Development Framework, adopted in 2012. This puts the authority in a strong position to resist poor quality when schemes go through full planning permission. In terms of resourcing and workload, the authority does not consider the extension of PD rights to have had a significant impact, they believe it has somewhat 'merged in with other workloads'. There has been no substantial media interest in the issue in Wakefield. The more contentious issue locally, in the media and politically, is houses in multiple occupation (HMOs).

The disadvantages were considered to be the range of factors that cannot be assessed in prior approvals, which was considered to lead to a poorer development overall. The process can be difficult for third parties to understand. Officers also mentioned that the new system is confusing for politicians, who only tend to get involved in larger applications. The GPDO is considered to be confusing in terms of the way it is written, which is particularly challenging for inexperienced officers. One further issue was identified, which was the inability to agree extensions to the limited time period available for determination of the prior approval, even when the applicant agrees an extension is necessary. The GPDO could be clearer on when the clock starts on the 56 days, and some flexibility introduced in cases where the authority does not have all the information. The quality of what is submitted by the applicant is often very mixed, including hand drawn drawings.

Assessing quality: site visits

Table 38 presents a summary of the data collected on our site visits in Wakefield. Our key findings from Wakefield are:

- There have been 22 prior approvals in Wakefield, all for office-to-resi conversions. In the same timescale, there have been 2 planning permissions for office-to-resi change of use and 7 for retail/sui generis-to-resi. Implementation rates for prior approvals are lower (at 68%) than for planning permissions (78%).
- As shown in Figure 44: Dwelling units observed, prior approval vs planning permission, WakefieldFigure 44, prior approval office-to-residential conversions are varied in size, with a roughly equal split between schemes that were 1-2 units, 3-9 units and 10+ units. There were no schemes larger than 30 units. All the retail/sui generis-to-resi conversions through planning permission were 1-2 units.
- External alterations were being secured in both schemes, although site landscaping improvements were only observed in planning permission schemes (see Figure 45).
- Bicycle parking and private open space were more likely to be provided in conversions with planning permission (see Table 38).

- Supporting anecdotal reporting from planning officers, the majority (>60%) of office-to-resi prior approvals are found in the city centre in Wakefield (Fig CS10.4). Retail-to-resi conversions are found in more varied settings, mostly in local high streets (Fig CS10.5)

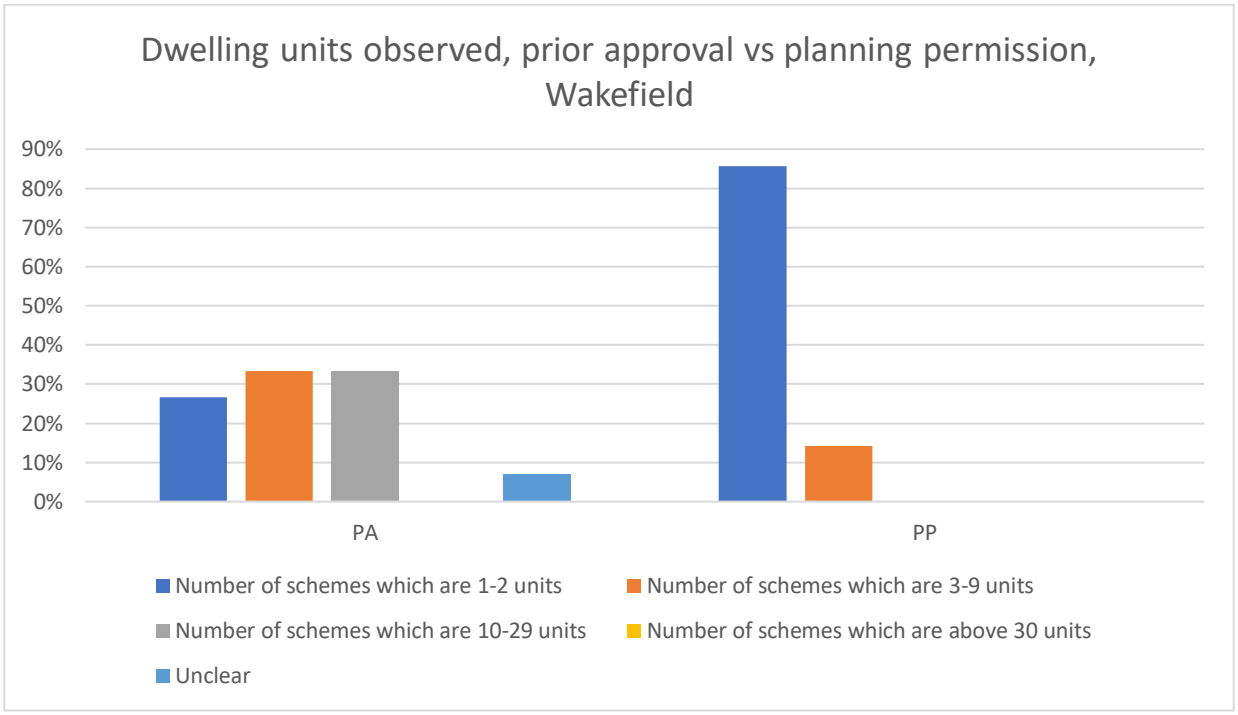

Figure 44: Dwelling units observed, prior approval vs planning permission, Wakefield

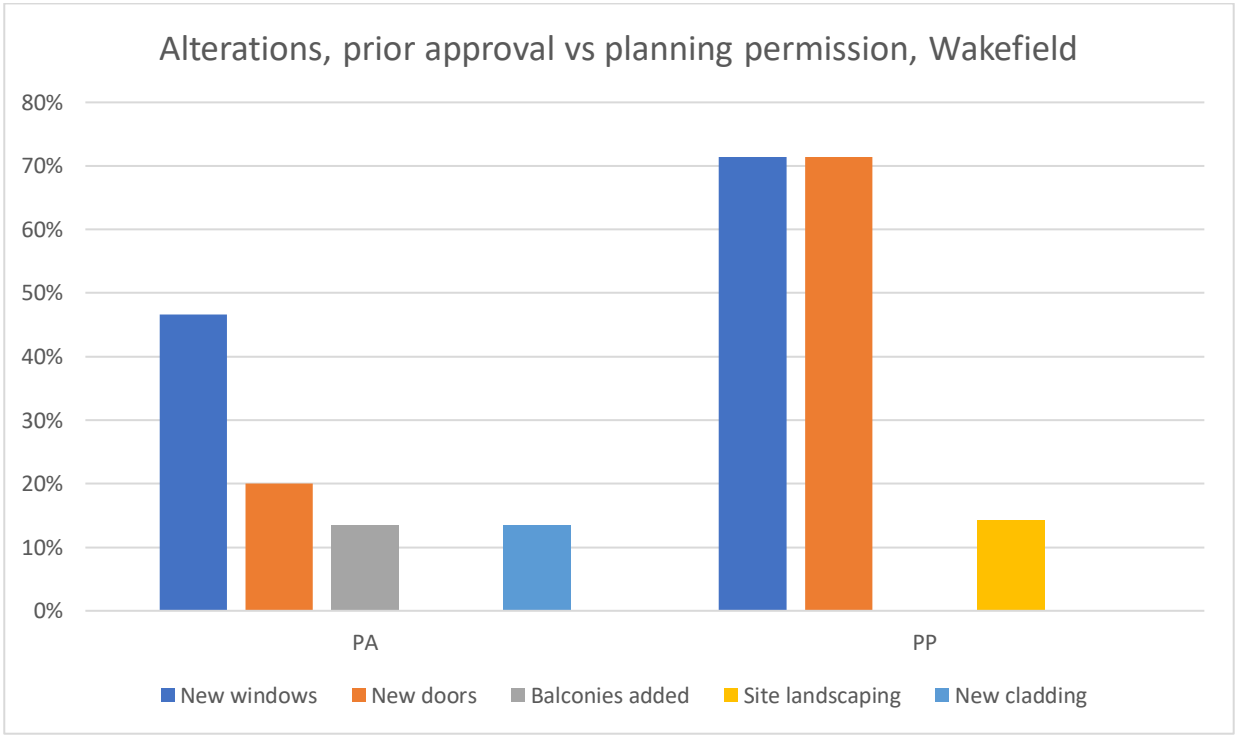

Figure 45: Notable external alterations, prior approval vs planning permission, Wakefield

Table 38: Results of site visits in Wakefield

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	22	0	0	**22**	2	7	0	**9**
Current state:								
Conversion not started - vacant business premises	18%	N/A	N/A	**18%**	0%	14%	N/A	**11%**
Conversion not started - partially occupied business premises	14%	N/A	N/A	**14%**	0%	0%	N/A	**0%**
Conversion not started - fully occupied business premises	0%	N/A	N/A	**0%**	0%	14%	N/A	**11%**
Conversion in progress	5%	N/A	N/A	**5%**	0%	0%	N/A	**0%**
Conversion completed - vacant residential unit(s)	5%	N/A	N/A	**5%**	50%	0%	N/A	**11%**
Conversion completed - occupied residential unit(s)	59%	N/A	N/A	**59%**	50%	71%	N/A	**67%**
Unclear	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Converted (total)	68%	N/A	N/A	**68%**	100%	71%	N/A	**78%**
Building original use:								
Residential single dwelling	5%	N/A	N/A	**5%**	50%	14%	N/A	**22%**
Residential apartment building	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Office building pre-WWII	18%	N/A	N/A	**18%**	0%	14%	N/A	**11%**
Office building 1950s-70s	0%	N/A	N/A	**0%**	50%	0%	N/A	**11%**
Office building 1980s-present	27%	N/A	N/A	**27%**	0%	0%	N/A	**0%**
Warehouse or light industrial building pre-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Warehouse or light industrial building post-WWII	14%	N/A	N/A	**14%**	0%	0%	N/A	**0%**
Light industrial ground floor / residential above	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Retail building pre-WWII	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Retail building post-WWII	5%	N/A	N/A	**5%**	0%	0%	N/A	**0%**
Retail ground floor / residential above	32%	N/A	N/A	**32%**	0%	71%	N/A	**56%**
Unclear								
Average building height (number of floors)	3.0	N/A	N/A	**3.0**	2.0	2.0	N/A	**2.0**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	27%	N/A	N/A	**27%**	50%	100%	N/A	**86%**
3-9 units	33%	N/A	N/A	**33%**	50%	0%	N/A	**14%**
10-29 units	33%	N/A	N/A	**33%**	0%	0%	N/A	**0%**
30+ units	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Unclear	7%	N/A	N/A	**7%**	0%	0%	N/A	**0%**
If converted, obvious notable alterations made:								
New windows	47%	N/A	N/A	**47%**	50%	80%	N/A	**71%**
New doors	20%	N/A	N/A	**20%**	50%	80%	N/A	**71%**
Balconies added	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
Site landscaping	0%	N/A	N/A	**0%**	50%	0%	N/A	**14%**
New cladding	13%	N/A	N/A	**13%**	0%	0%	N/A	**0%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	N/A	N/A	**0%**	50%	0%	N/A	**14%**
Car parking	40%	N/A	N/A	**40%**	100%	20%	N/A	**43%**
Concierge	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Gym	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Roof terrace	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Private open space	7%	N/A	N/A	**7%**	50%	60%	N/A	**57%**
Public open space	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Adequate provision made for waste / refuse	80%	N/A	N/A	**80%**	100%	80%	N/A	**86%**
Adequate provision made for mail deliveries	93%	N/A	N/A	**93%**	100%	100%	N/A	**100%**
Building location:								
City or town centre mixed use	64%	N/A	N/A	**64%**	50%	14%	N/A	**22%**
Local high street mixed use	5%	N/A	N/A	**5%**	0%	43%	N/A	**33%**
Mostly commercial area	14%	N/A	N/A	**14%**	0%	14%	N/A	**11%**
Mostly industrial area	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Mostly residential area	18%	N/A	N/A	**18%**	50%	29%	N/A	**33%**
Isolated rural area	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Not answered	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Researchers impression on location:								
Obviously close to local shops and services	91%	N/A	N/A	**91%**	100%	86%	N/A	**89%**
Obviously accessible by public transport	86%	N/A	N/A	**86%**	100%	86%	N/A	**89%**
Obviously close to local open or green space	9%	N/A	N/A	**9%**	50%	57%	N/A	**56%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 14 implemented conversion schemes in Wakefield are illustrated by Table 39, below.

Table 39: Results of desk based analysis for Wakefield

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	7	0	0	**7**	2	5	0	**7**
Permission for change of use:								
Prior approval - one only	86%	N/A	N/A	**86%**	0%	0%	N/A	**0%**
Prior approval - multiple	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Planning permission - one only	0%	N/A	N/A	**0%**	50%	80%	N/A	**71%**
Planning permission - multiple	0%	N/A	N/A	**0%**	50%	20%	N/A	**29%**
Both prior approval and planning permission	14%	N/A	N/A	**14%**	0%	0%	N/A	**0%**
Prior approval with associated planning permission	29%	N/A	N/A	**29%**	N/A	N/A	N/A	**N/A**
Number of units created	113	N/A	N/A	**113**	3	6	N/A	**9**
Average number of units per scheme	16.1	N/A	N/A	**16.1**	1.5	1.2	N/A	**1.29**
Unit sizes:								
Studio flats	29%	N/A	N/A	**29%**	0%	0%	N/A	**0%**
One bedroom flats	38%	N/A	N/A	**38%**	0%	33%	N/A	**22%**
Two bedroom flats	33%	N/A	N/A	**33%**	0%	0%	N/A	**0%**
Three or more bedroom flats	0%	N/A	N/A	**0%**	33%	0%	N/A	**11%**
Maisonette or house	0%	N/A	N/A	**0%**	67%	67%	N/A	**67%**
Units complying with national space standards	37%	N/A	N/A	**37%**	100%	83%	N/A	**89%**
Units with access to private amenity space	0%	N/A	N/A	**0%**	33%	50%	N/A	**44%**
Buildings with access to communal amenity space	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Only skylights or rooflights	0%	N/A	N/A	**0%**	33%	0%	N/A	**11%**
Only facing an atrium	6%	N/A	N/A	**6%**	0%	0%	N/A	**0%**
Single aspect	51%	N/A	N/A	**51%**	0%	17%	N/A	**11%**
Single aspect / north facing only	22%	N/A	N/A	**22%**	0%	0%	N/A	**0%**
Dual or triple aspect windows	49%	N/A	N/A	**49%**	100%	83%	N/A	**89%**
EPC rating:								
A	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
B	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
C	86%	N/A	N/A	**86%**	50%	0%	N/A	**14%**
D	0%	N/A	N/A	**0%**	0%	60%	N/A	**43%**
E	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
F	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
G	14%	N/A	N/A	**14%**	0%	20%	N/A	**14%**
Unclear	0%	N/A	N/A	**0%**	0%	50%	N/A	**28.6%**
Council tax:								
A	67%	N/A	N/A	**67%**	0%	80%	N/A	**57%**
B	22%	N/A	N/A	**22%**	50%	0%	N/A	**14%**
C	11%	N/A	N/A	**11%**	0%	0%	N/A	**0%**
D	0%	N/A	N/A	**0%**	0%	20%	N/A	**14%**
E	0%	N/A	N/A	**0%**	50%	0%	N/A	**14%**
F	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
G	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
H	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
Unclear	0%	N/A	N/A	**0%**	0%	0%	N/A	**0%**
GIS Analysis:								
Average Index Multiple deprivation	2.30	N/A	N/A	**2.30**	1.50	2.60	N/A	**2.29**
Average Access to Public Green Space score	4.20	N/A	N/A	**4.20**	2.00	1.20	N/A	**1.43**
Walking distance to small supermarket	100%	N/A	N/A	**100%**	50%	80%	N/A	**71%**
Walking distance to large supermarket	100%	N/A	N/A	**100%**	50%	80%	N/A	**71%**
Walking distance to a bus stop	100%	N/A	N/A	**100%**	100%	100%	N/A	**100%**
Walking distance to a rail station	100%	N/A	N/A	**100%**	100%	40%	N/A	**57%**

The desk based research is based on an analysis of the following prior approval schemes:

- *14-28 Gillygate, Pontefract; 15-17 Cheapside, Wakefield; 18 King Street, Wakefield; Chamber of Commerce House, 168 Westgate, Wakefield; Custom House, The Springs, Wakefield; Micklegate*

House, Horsefair, Pontefract; New City Chambers, Wood Street, Wakefield; Reams House, Crown and Anchor Yard, Potenfract

And the following planning permission schemes:

- *12-14 Cross Street, Wakefield; 129 Pontefract Road, Featherstone, Pontefract; 17 Barstow Square, Wakefield; 220 Doncaster Road, Wakefield; 6 Highfield Road, Hemsworth, Pontefract; 67 & 69 Leeds Road, Cutsyke, Castleford; Wesley Street Workspace, 2 Wesley Street, Castleford*

In Wakefield, we have been able to consider an identical number of schemes consented by prior approval compared to full planning permission, but as is common across our study, the scheme sizes through full planning permission are much smaller. The neighbourhood location of schemes under the two routes might be considered broadly similar, with almost identical Index of Multiple Deprivation scores and, whilst the planning permission projects have better access to public green space, the prior approval projects have slightly better access to supermarkets and public transport.

Differences between the two routes emerge when we look at scheme size: the prior approval consented schemes are much more likely to comprise studio and one-bedroom units, and much less likely to comply with the Nationally Described Space Standards (37% of prior approval units compared to 89% of planning permission ones). The prior approval consented units are much more likely to be single aspect only windows (51% compared to just 11% of planning permission units). The 33% of planning permission consented office-to-residential conversion units which would have only skylights or rooflights actually represents a single unit, and the officer report considers that it would still have a sufficient level of natural light.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 15m^2 in Chamber of Commerce House. The mean average of the smallest unit found in each prior approval scheme examined in Wakefield was 34.9m^2, reflecting a quantum of small units created through PD locally. The smallest unit found in a planning permission scheme was the 36m^2 in 17 Barstow Square. The mean average of the smallest unit found in each planning permission scheme examined in Wakefield was 98.6m^2.

Conclusions

In Wakefield, the implementation rate for planning permission schemes was actually higher than for permitted development schemes. Planning permission schemes were more likely to have visible exterior alterations and access to amenities. The compliance with space standards is much higher for planning permission units, and there is a better window arrangement and access to amenity space. In making such a comparison, it is important to note that the unit numbers for the PD schemes are much higher, however.

Appendix 11: Case Study Eleven – Waverley

Introduction and planning context

Waverley is a district level authority within the county council area of Surrey, in South East England. The borough comprises the historic markets towns of Farnham and Godalming as well as the settlements of Cranleigh and Hindhead and a number of smaller villages spread across an area of countryside. Much of the authority area is within the Metropolitan Green Belt and also the Surrey Hills Area of Outstanding Natural Beauty, and there are numerous listed buildings. There is also the Thames Basin Heaths Specials Protection Area around Farnham.[116] It is classified as a 'Rural 50' authority.

In February 2018, the *Waverley Borough Local Plan Part 1: Strategic Policies and Sites* was adopted.[117] This sets an objective to support the delivery of at least 11,210 additional homes 2013-2032 (an average of 590 per annum). Other local plan objectives include to deliver a balance of housing and employment growth, to safeguard existing employment accommodation and to ensure that the design, form and location of new developments contribute to the creation of sustainable communities.

Policy AHN1 in the local plan looks for 30% on site affordable housing provision for developments of 11 units or more, and either on site provision or a financial contribution for developments of six units or more in rural areas. Policy AHN2 allows small scale affordable housing development in rural areas as a 'rural exception sites' policy. Policy AHN3 requires a range of different types and sizes of housing to be provided in new developments, and for new homes to meet the Building Regulations M4(2) 'accessible and adaptable dwellings' standard. Finally, policy TD1, on townscape and design, requires new development to be of a high quality and inclusive design, responding to local character, and maximising opportunities to improve quality of life, health and wellbeing by providing private, communal and public amenity space, appropriate internal space standards, on site play space, appropriate waste storage facilities and private clothes drying facilities.

Waverley adopted supplementary planning guidance in October 2003 on the *Density and Size of Dwellings*.[118] This sought to encourage higher density development, with provision of two-bedroom dwellings for which there had been an undersupply locally, but with adequate floorspace specified.

There are specific expectations around planning obligations in the Thames Basin Heaths Specials Protection Area. Waverley adopted a CIL charging schedule in October 2018.[119] An Article 4 direction for various categories of commercial to residential permitted development (including shops and financial services to residential, office to residential, light industrial to residential and storage to residential) for the Beacon Hill area of the borough came into force in April 2019.[120] Figure 46, below, is a map illustrating change of use schemes through both the PD and FPA routes in Waverley, 2015-2018.

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[116] 'Thames Basin Heaths Special Protection Area' at https://www.waverley.gov.uk/info/1004/planning_policy/361/thames_basin_heaths_special_protection_area_spa_-_around_farnham

[117] 'Adopted Local Plan Part 1' at https://www.waverley.gov.uk/downloads/download/2345/adopted_local_plan_part_1

[118] 'Supplementary Planning Guidance on Density and Size of Dwellings' at https://www.waverley.gov.uk/downloads/download/257/supplementary_planning_guidance_spg_on_density_and_size_of_dwellings_policy_h4_of_the_waverley_borough_local_plan_2002

[119] 'Waverley Borough Council Community Infrastructure Levy Charging Schedule' at https://www.waverley.gov.uk/downloads/file/6454/cil_charging_schedule

[120] 'Article 4 Direction for Commercial to Residential' at https://www.waverley.gov.uk/info/1004/planning_policy/2133/article_4_direction_for_commercial_to_residential

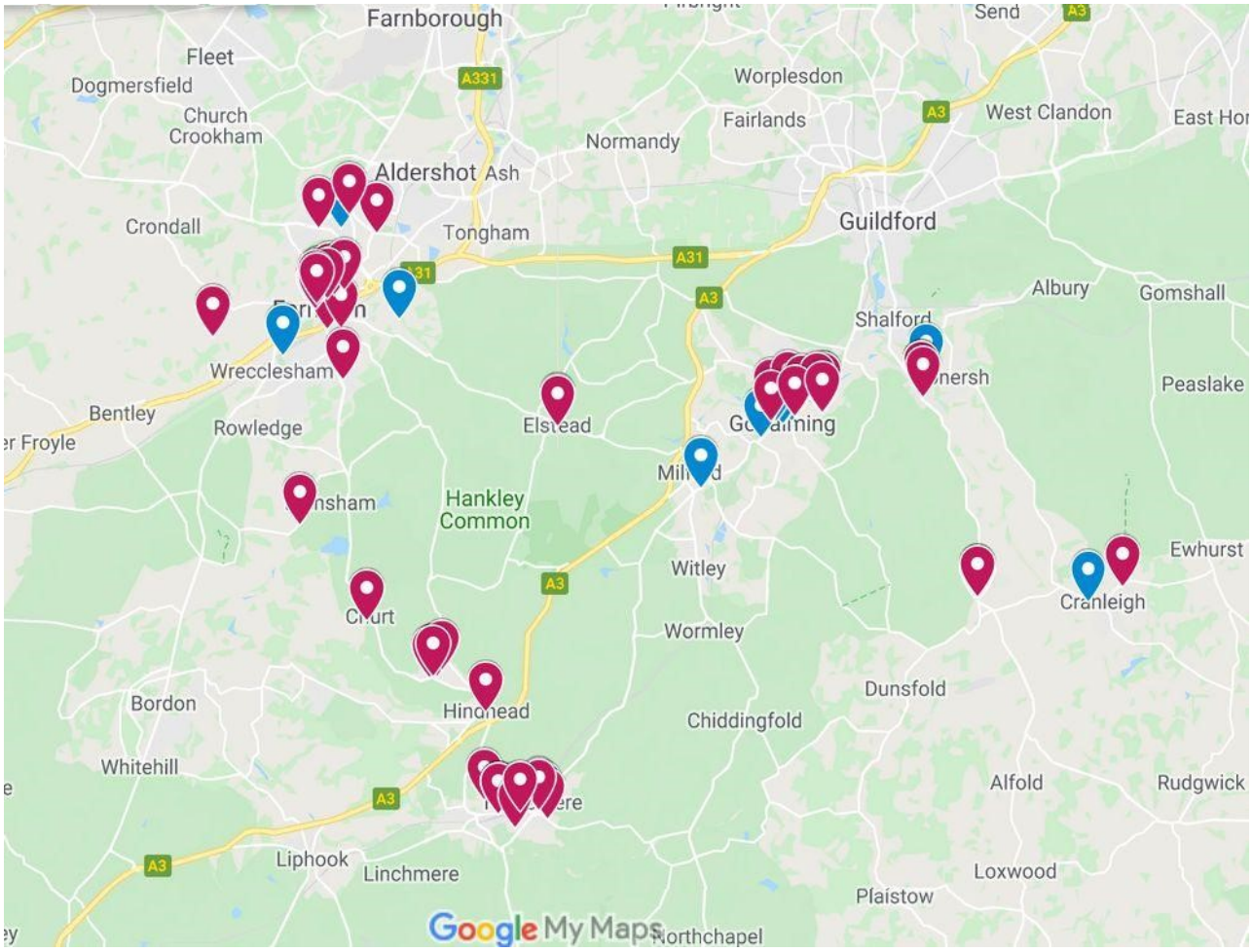

Figure 46: Map illustrating change of use schemes through both the PD and FPA routes in Waverley, 2015-2018 (Source: UCL research team, on a Google Maps base map)

Local housing and real estate market

Waverley is one of the smallest case studies by population, with the lowest unemployment rate (2.0%), above average job density (0.91) and the lowest rates of deprivation across all case studies. In this affluent local authority house prices have risen by 22.7% in the last decade, although transaction volumes have decreased substantially in the last five years by -23.8%. The house price to earnings ratio has also increased from 8.93 (2012) to 11.83 (2018), making Waverley the least affordable case study outside of London. The office market is relatively small (1.4 million square feet of space), and has no 4 & 5 star office supply at all. Net absorption of space has contracted in the last year, with only minimal new supply coming onto a market where rental growth in the office market is currently 1.0%. The retail market is also relatively small (1.7 million square feet of space), and is dominated by general retailing, where rents sit at £24.55 per square foot. However, shopping centre rents in Waverley are much higher, at £70.32 per square foot, and low vacancy rates across the retail sector more broadly (0.9%).

Local authority views

Alongside a concern about the loss of office space in Waverley (albeit in the context of reduced employment space needs compared to a decade ago), the planning officer interviewed there was also aware of complaints about their quality, and this had cause concern with neighbouring residents and amongst local councillors.

A number of sizeable office buildings in Godalming had been converted and there were some design concerns, and issues such as insufficient insultation. Most conversions were not seen to provide the quality of residential accommodation desired locally. There was, however, a recognition that PD had contributed to housing numbers locally and some units were slightly more affordable, due to their very small size.

With PD, the Council feel restricted as cannot put requirements around materials or try to require conversions to respect the vernacular and so the character of the small market towns which make the borough a distinctive and valued place. The schemes often involve working with a shell, with quality depending on the building layout to begin with and the desire of developers. Many office-to-residential schemes are utilitarian with sub-standard unit sizes described as being like 'battery housing'. Storage and retail-to-residential have been less on the radar locally.

The Nationally Described Space Standards have not been introduced locally yet, but there is an aspiration to include this in the second part of the local plan, which is still being prepared. It is an issue which the Council press developers on. A design code is being discussed locally.

There is an Article 4 Direction in place to restrict the various commercial-to-residential permitted developments at Beacon Hill, near Hindhead. This was introduced in response to local concern as a number of prior approvals had come forward for a small local entre and the character was starting to change. The Council are also in the process of making another Article 4 for an area of Godalming near the station. This has been driven by local councillors, who were concerned following the loss of a couple of business park locations along Cattershall Lane.

It is apparently rare for the Council to say 'prior approval not required' as they are concerned to exert what management they can to uphold standards (because this is expected by Councillors and local residents). They often do not get sufficient information submitted with prior approvals and have to ask for more, particularly around highways and flooding issues. Conditions would be used on prior approvals if mitigation is required in relation to things like highways impacts and also to ensure compliance with submitted plans. Enforcement action had been taken on one PD scheme over that issue.

They have refused quite a few prior approvals, sometimes for technical issues relating to the precise requirements of the process, and sometimes on flooding. In the Thames Basin Heaths Special Protection Area, a Habitats Regulation Assessment is required in addition to the usual Prior Approval requirements.

CIL has been obtained from some schemes and have also taken enforcement action where some developers have failed to notify the commencement of works. Applicants do not usually use the Council's own Building Control Inspectors so there's less awareness about Building Regulations issues for PD schemes.

It was fairly common to have a prior approval and planning application submitted together, for example to add an additional floor (as seen at Westbrook Mills) and some developers have wanted to improve the quality of schemes through exterior works requiring a planning permission.

PD has led to a greater number of change of use schemes in the borough. Before PD, there were some smaller conversion schemes but it would have been very rare for large office buildings to change to residential use. A typical scheme locally is a commercial unit above a shop on a high street, or a business park office building converted to residential. There are no particular developers who stand out, it tends to apparently be more 'opportunist' SME developers and landlords responding to the exceptionally high property prices locally. Implemented schemes are mainly used for market sale.

There have been some concerns about the quality of PD schemes at a number of local buildings which were specifically named to us by the local planning officer interviewed, including Wey Hill,

Weir View, Guardian House (although this apparently relates more to interior building management issues) and Panda House.

Overall, it was felt that PD had hampered the ability of the Council to manage good design locally. Many converted office buildings are decades old, and have been converted without much change to their exterior appearance, which might be a sub-optimal design for the location and not responding to the particular design identity of Waverley borough. The planning officer interviewed felt that the local planning authority should be able to make local policy to manage their built environment effectively.

Assessing quality: site visits

Table 40 presents a summary of the data collected on our site visits in Waverley. Our key findings are that:

- In Waverley, there were 41 prior approvals (34 office-to-resi, 6 retail-to-resi and 1 light industrial-to-resi) and 31 planning permissions (15 office-to-resi, 15 retail-to-resi and 1 industrial-to-resi). Planning permissions were more likely to have been implemented (61%) than prior approvals (54%). With a good sample in both categories, comparisons between the two are likely to be more revealing and robust than in other places.
- If converted, retail-to-resi conversions tend to be smaller than office-to-resi conversions, this holds for both prior approval and planning permissions (see Figure 47 and Figure 49). Retail-to-resi conversions are mostly 1-2 units, whereas office-to-resi conversions are more evenly spread across 1-2 uits, 3-9 units and 10-29 units. There are no large scale (30+ units) conversions in Waverley.
- It is difficult to draw robust conclusions from the data on notable external alterations. In Figure 49 below, the data on light-industrial-to-resi is misleading and best ignored, as there was only one prior approval scheme in this category. Of the other categories, comparing Figure 49 and Figure 50 shows that office to resi schemes with planning permission were more likely to have balconies (20%) and site landscaping (40%) compared to schemes with prior approval (7% and 13% respectively). However, the data also suggests that prior approval retail-to-resi conversions are more likely to have new doors than those through planning permission.

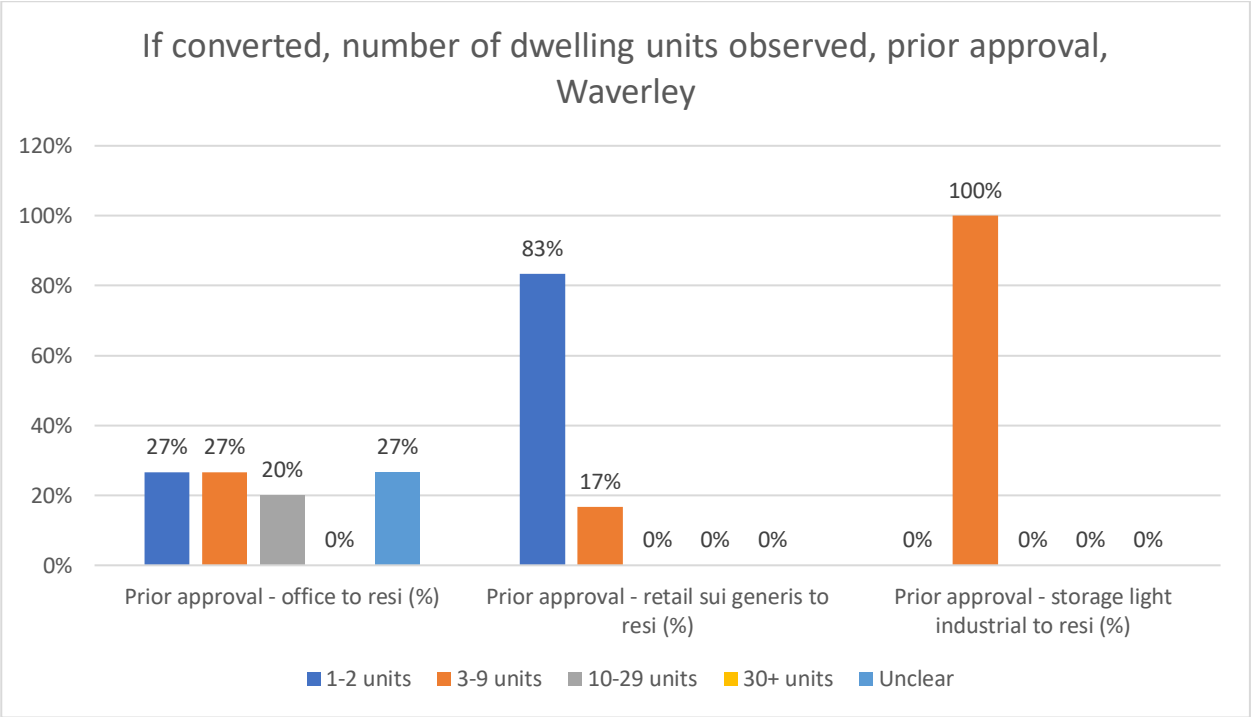

Figure 47: Number of dwelling units observed in prior approval conversions, Waverley

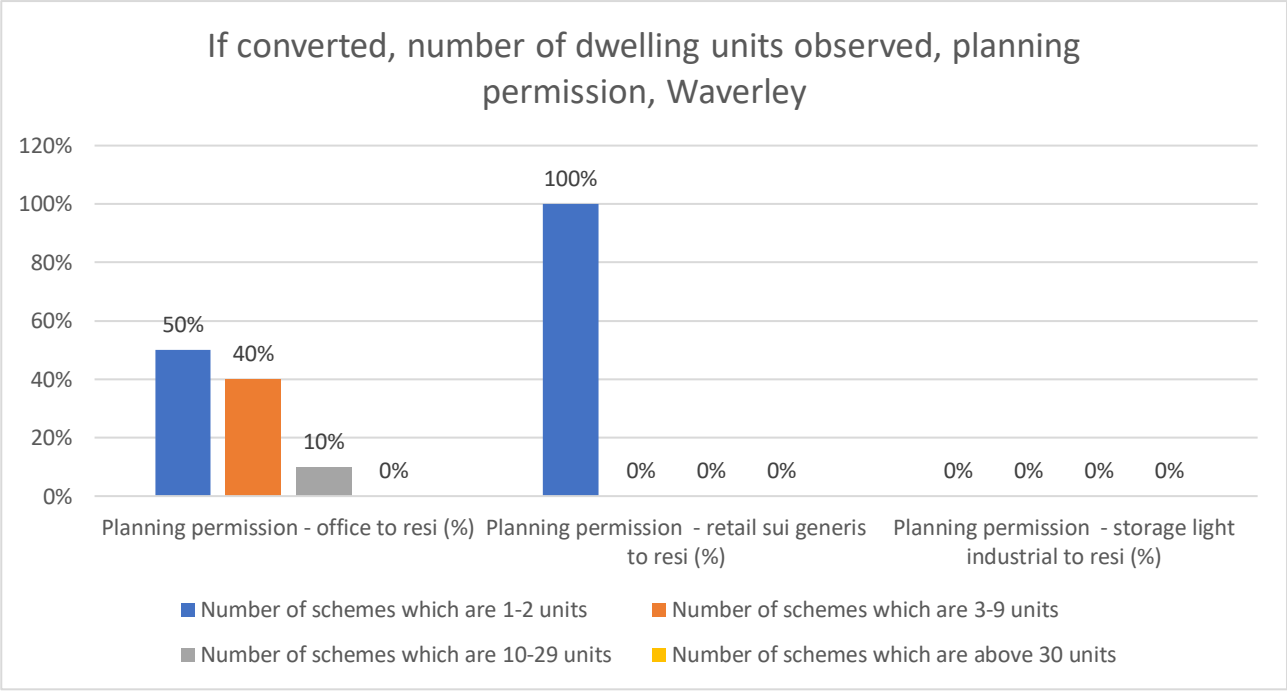

Figure 48: Number of dwelling units observed in planning permission conversions, Waverley

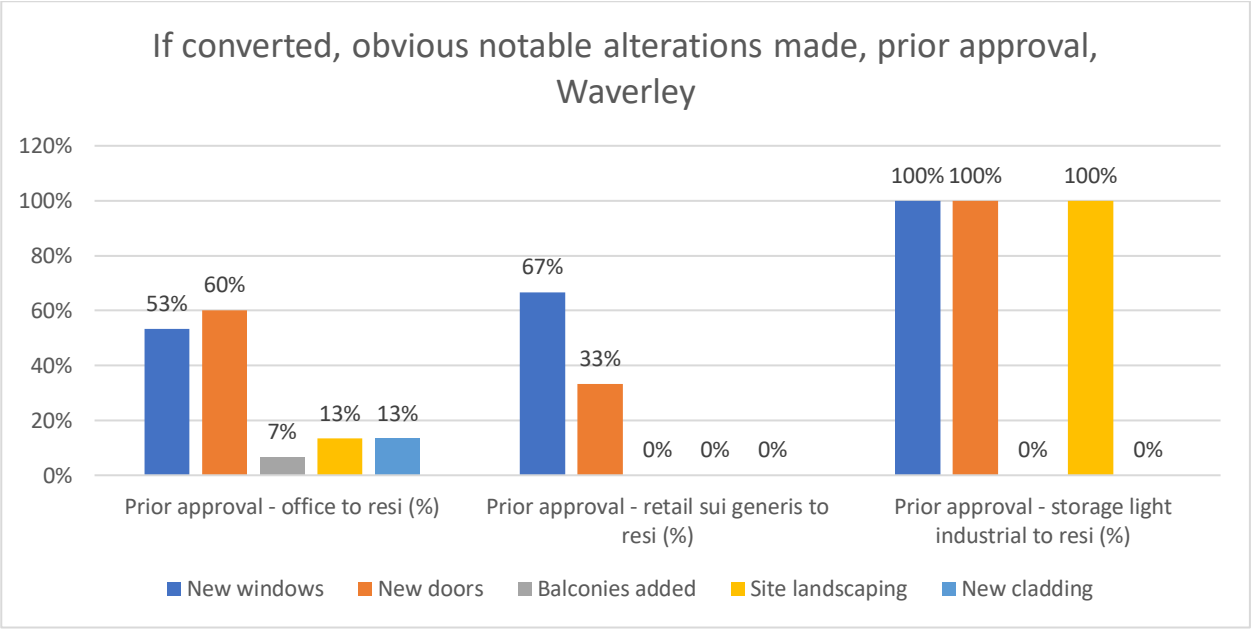

Figure 49: Notable alterations, prior approval, Waverley

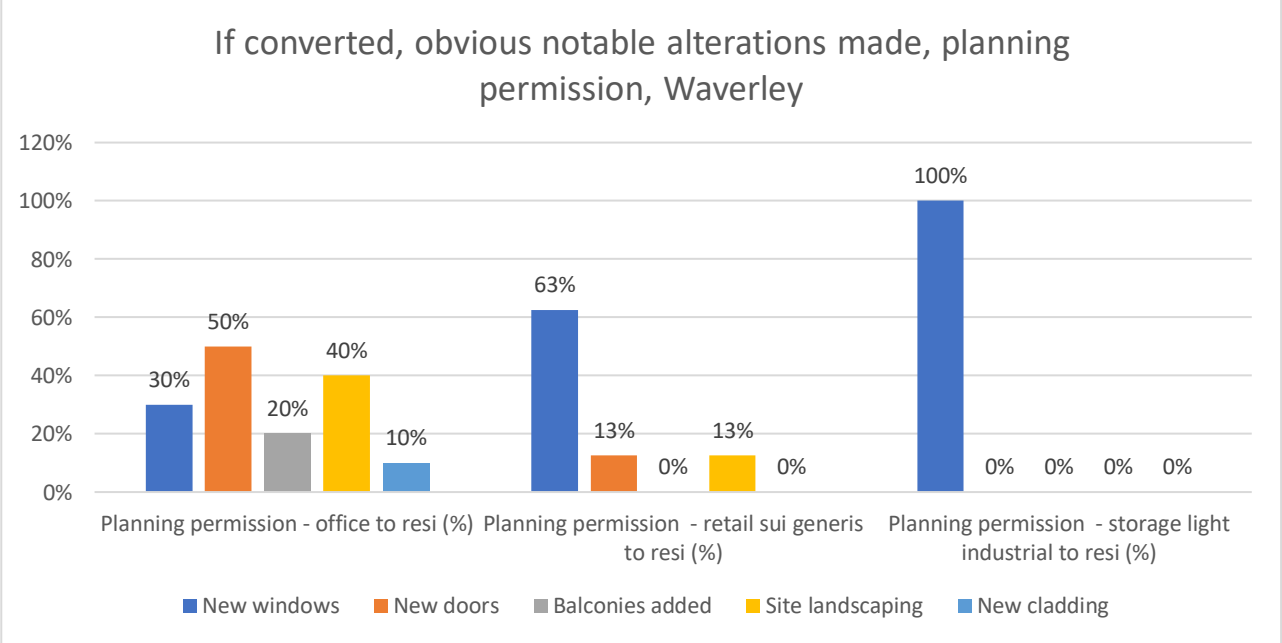

Figure 50: Notable alterations, planning permission, Waverley

Table 40: Results of site visits in Waverley

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings visited	34	6	1	**41**	15	15	1	**31**
Current state:								
Conversion not started - vacant business premises	6%	0%	0%	**5%**	0%	0%	0%	**0%**
Conversion not started - partially occupied business premises	9%	0%	0%	**7%**	13%	20%	0%	**16%**
Conversion not started - fully occupied business premises	38%	0%	0%	**32%**	7%	20%	0%	**13%**
Conversion in progress	12%	0%	100%	**12%**	7%	7%	0%	**6%**
Conversion completed - vacant residential unit(s)	0%	0%	0%	**0%**	0%	13%	0%	**6%**
Conversion completed - occupied residential unit(s)	32%	100%	0%	**41%**	60%	33%	100%	**48%**
Unclear	3%	0%	0%	**2%**	13%	7%	0%	**10%**
Converted (total)	44%	100%	100%	**54%**	67%	53%	100%	**61%**
Building original use:								
Residential single dwelling	38%	50%	0%	**39%**	73%	47%	0%	**58%**
Residential apartment building	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Office building pre-WWII	9%	0%	0%	**7%**	0%	0%	0%	**0%**
Office building 1950s-70s	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Office building 1980s-present	15%	0%	0%	**12%**	0%	0%	0%	**0%**
Warehouse or light industrial building pre-WWII	0%	0%	100%	**2%**	7%	0%	0%	**3%**
Warehouse or light industrial building post-WWII	0%	17%	0%	**2%**	0%	0%	0%	**0%**
Light industrial ground floor / residential above	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Retail building pre-WWII	12%	0%	0%	**10%**	7%	0%	0%	**3%**
Retail building post-WWII	21%	0%	0%	**17%**	0%	0%	0%	**0%**
Retail ground floor / residential above	6%	33%	0%	**10%**	13%	53%	100%	**35%**
Unclear	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Average building height (number of floors)	2.1	1.9	2.0	**2.1**	3.3	3.0	2.0	**2.5**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
If converted, number of dwelling units observed:								
1-2 units	27%	83%	0%	**41%**	50%	100%	0%	**68%**
3-9 units	27%	17%	100%	**27%**	40%	0%	0%	**21%**
10-29 units	20%	0%	0%	**14%**	10%	0%	0%	**5%**
30+ units	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Unclear	27%	0%	0%	**18%**	0%	0%	100%	**5%**
If converted, obvious notable alterations made:								
New windows	53%	67%	100%	**59%**	30%	63%	100%	**47%**
New doors	60%	33%	100%	**55%**	50%	13%	0%	**32%**
Balconies added	7%	0%	0%	**5%**	20%	0%	0%	**11%**
Site landscaping	13%	0%	100%	**14%**	40%	13%	0%	**26%**
New cladding	13%	0%	0%	**9%**	10%	0%	0%	**5%**
If converted, obvious additional facilities provided:								
Bicycle parking	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Car parking	53%	17%	100%	**45%**	50%	25%	0%	**37%**
Concierge	0%	0%	0%	**0%**	10%	0%	0%	**5%**
Gym	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Roof terrace	0%	0%	0%	**0%**	10%	0%	0%	**5%**
Private open space	7%	17%	100%	**14%**	40%	25%	0%	**32%**
Public open space	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Adequate provision made for waste / refuse	73%	83%	100%	**77%**	100%	100%	100%	**100%**
Adequate provision made for mail deliveries	80%	83%	100%	**82%**	100%	100%	100%	**100%**
Building location:								
City or town centre mixed use	3%	17%	0%	**5%**	33%	13%	0%	**23%**
Local high street mixed use	18%	50%	0%	**22%**	40%	60%	100%	**52%**
Mostly commercial area	12%	0%	0%	**10%**	0%	0%	0%	**0%**
Mostly industrial area	3%	0%	0%	**2%**	0%	0%	0%	**0%**
Mostly residential area	65%	33%	0%	**59%**	20%	27%	0%	**23%**
Isolated rural area	0%	0%	100%	**2%**	0%	0%	0%	**0%**
Not answered	0%	0%	0%	**0%**	7%	0%	0%	**3%**
Researchers impression on location:								
Obviously close to local shops and services	65%	83%	0%	**66%**	87%	93%	100%	**90%**
Obviously accessible by public transport	85%	67%	0%	**80%**	87%	87%	100%	**87%**
Obviously close to local open or green space	41%	50%	0%	**41%**	67%	87%	100%	**77%**

Assessing quality: desk based analysis

The results of our desk-based analysis of 25 implemented conversion schemes in Waverley are illustrated by Table 41, below.

Table 41: Results of desk based analysis for Waverley

	Prior approval - office to resi	Prior approval - retail sui generis to resi	Prior approval - storage light industrial to resi	All prior approval buildings	Planning permission - office to resi	Planning permission - retail sui generis to resi	Planning permission - storage light industrial to resi	All planning permission buildings
Number of buildings considered	6	5	1	**12**	7	5	1	**13**
Permission for change of use:								
Prior approval - one only	83%	80%	0%	**75%**	0%	0%	0%	**0%**
Prior approval - multiple	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Planning permission - one only	0%	20%	0%	**8%**	100%	80%	100%	**92%**
Planning permission - multiple	0%	0%	0%	**0%**	0%	20%	0%	**8%**
Both prior approval and planning permission	17%	0%	100%	**17%**	14%	0%	0%	**8%**
Prior approval with associated planning permission	17%	20%	100%	**25%**	N/A	N/A	N/A	**N/A**
Number of units created	49	18	4	**71**	28	13	14	**55**
Average number of units per scheme	8.17	3.6	4	**5.92**	4	2.6	14	**4.23**
								Unit sizes:
Studio flats	12%	0%	0%	**8%**	7%	8%	0%	**5%**
One bedroom flats	65%	33%	0%	**54%**	64%	23%	0%	**38%**
Two bedroom flats	22%	61%	100%	**37%**	29%	38%	86%	**45%**
Three or more bedroom flats	0%	0%	0%	**0%**	0%	23%	14%	**9%**
Maisonette or house	0%	6%	0%	**1%**	0%	8%	0%	**2%**
Units complying with national space standards	35%	89%	100%	**52%**	57%	100%	100%	**78%**
Units with access to private amenity space	22%	17%	0%	**20%**	14%	46%	71%	**36%**
Buildings with access to communal amenity space	0%	60%	0%	**25%**	14%	0%	0%	**8%**

	PA O-R	*PA R/S-R*	*PA S/LI-R*	***All PA***	*FPA O-R*	*FPA R/S-R*	*FPA S/LI-R*	***All FPA***
Windows:								
No window at all	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Only skylights or rooflights	0%	0%	0%	**0%**	21%	0%	0%	**11%**
Only facing an atrium	0%	0%	0%	**0%**	11%	0%	29%	**13%**
Single aspect	59%	33%	0%	**49%**	18%	0%	57%	**24%**
Single aspect / north facing only	8%	11%	0%	**8%**	0%	0%	0%	**0%**
Dual or triple aspect windows	41%	67%	100%	**51%**	61%	100%	43%	**65%**
EPC rating:								
A	0%	0%	0%	**0%**	0%	0%	0%	**0%**
B	0%	0%	0%	**0%**	14%	20%	100%	**23%**
C	0%	20%	0%	**8%**	0%	0%	0%	**0%**
D	67%	0%	0%	**33%**	29%	20%	0%	**23%**
E	33%	20%	0%	**25%**	0%	20%	0%	**8%**
F	0%	20%	100%	**17%**	0%	0%	0%	**0%**
G	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Unclear	0%	40%	0%	**16.7%**	57.1%	40%	0%	**46.2%**
Council tax:								
A	0%	20%	0%	**8%**	0%	0%	0%	**0%**
B	33%	40%	0%	**33%**	29%	40%	0%	**31%**
C	17%	20%	0%	**17%**	29%	0%	0%	**15%**
D	0%	20%	0%	**8%**	0%	20%	100%	**15%**
E	17%	0%	0%	**8%**	0%	0%	0%	**0%**
F	0%	0%	0%	**0%**	0%	0%	0%	**0%**
G	0%	0%	100%	**8%**	0%	0%	0%	**0%**
H	0%	0%	0%	**0%**	0%	0%	0%	**0%**
Unclear	33.3%	20%	0%	**16.7%**	42.9%	40%	0%	**38.5%**
GIS Analysis:								
Average Index Multiple deprivation	8.80	8.90	8.00	**8.78**	8.60	9.00	10.00	**8.86**
Average Access to Public Green Space score	4.20	4.10	2.00	**3.98**	2.30	7.90	4.00	**4.58**
Walking distance to small supermarket	100%	60%	0%	**75%**	100%	80%	0%	**85%**
Walking distance to large supermarket	83%	60%	0%	**67%**	71%	60%	0%	**62%**
Walking distance to a bus stop	100%	100%	0%	**92%**	100%	100%	100%	**100%**
Walking distance to a rail station	83%	60%	0%	**67%**	71%	60%	0%	**62%**

The desk based research is based on an analysis of the following prior approval schemes:

- *12 Lion and Lamb Yard, Farnham; 19-21 West House, West Street, Haslemere; 43 East Street, Farnham; 60-62 Wey Hill, Haslemere; 7 Beacon Hill Road, Hindhead; 9-12 Lion and Lamb Yard, Farnham; Crown House, Lower Street, Farnham; Barn C, Dockenfield Farm, Pitt Lane, Frensham;*

Pevensey, Beacon Hill Road, Hindhead; Southern House, Flambard Way, Godalming; The Barbican, East Street, Farnham; The Old Bakery, 122 Upper Hale Road, Farnham

And the following planning permission schemes:

- *18b Lower Street, Haslemere, 19 Bethel Lane, Farnham; 20 Bridge Street, Godalming; 4-5 Hampton Terrace, Beacon Hill Road, Hindhead; 46 West Street, Haslemere; 49 Downing Street, Farnham; 51 High Street, Godalming; 9 Beacon Hill Road, Hindhead; Bridge House, South Street, Farnham; Church House, Church Street, Godalming; Hollyhocks Cottage, High Street, Bramley; The Courtyard, Eastwood Road, Bramley; Weavers Yard, West Street, Farnham*

Waverley has the closest balance in terms of the number of schemes considered and the number of units created between the prior approval and the full planning permission route. There are slightly more one-bedroom and fewer two-bedroom units created through the prior approval route than the full planning permission route here, but it is worth noting that local planning policy actually calls for more one-bedroom units, citing an oversupply of larger family housing. There is a broadly comparable picture between prior approval and planning permission units in terms of their neighbourhood location and Council Tax banding. The prior approval units are less likely to have access to private amenity space (20% of units compared to 36% through full planning permission) but more likely to have access to communal amenity space (25% compared to 8% though full planning permission).

There are more noticeable differences in terms of the compliance with Nationally Described Space Standards, however, with 52% of prior approval units meeting these compared to 78% of units created through full planning permission. Although noticeably lower for PD units, it is interesting that this 52% is much higher than in some other case studies, again suggestive of a link between the strength of the local housing market and level of social deprivation and housing quality. The EPC performance is also generally better for planning permission than PD units.

From the schemes considered through the detailed desk-based analysis, the smallest unit found in a prior approval scheme was 16.2m^2 in 9-12 Lion and Lamb Yard. The mean average of the smallest unit found in each prior approval scheme examined in Waverley was 46.1m^2. The smallest unit found in a planning permission scheme was the 31m^2 in 19 Prospect House. This scheme was refused planning permission by the LPA but allowed on appeal, with the inspector noting that the scheme would on balance, provide satisfactory living conditions for future residents. The building also already had a prior approval for change of use as a fall-back option (the developers wanted to extend the building so were seeking a planning permission). In two other schemes with units smaller than the NDSS, these did actually meet the internal space standards suggested in the local SPG. The mean average of the smallest unit found in each planning permission scheme examined in Waverley was 121.1m^2.

In terms of windows and light, 51% of PD units are dual aspect, compared to 65% of planning permission units. It is noticeable, though, that 11% of planning permission units had only skylights or rooflights compared to none of the PD units examined. Looking at the officer reports, the arrangement of windows / amount of natural light into residential properties does not appear to be something which was specifically commented upon in the planning officer reports, however this 11% represents six units in two schemes. One of the schemes is an eighteenth century listed building where it might not be possible to alter the roof for any other window arrangements and the other scheme was one whereby the applicant already had a prior approval for the same property but was seeking a planning permission instead (to also allow alterations as well as the change of use), and the application was actually rejected by the Council (but then allowed on appeal).

Conclusions

Implementation rates for planning permissions were slightly higher in Waverley than PD schemes, and such conversions were more likely to have visible alterations made to the buildings. Neighbourhood locations tended to be slightly better for planning permission schemes, with better access to amenity space and better compliance with nationally described space standards. It is

notable, however, that whilst the 52% of PD units complying with those space standards is significantly lower than the 78% of planning permission units, it is still comparatively high compared to our other case studies. Given the low deprivation levels an high average prices in Waverley, like Richmond, this may reflect the strength of the local housing market.

Appendix 12: Article 4 Directions

List of Local Planning Authorities with an Article 4 direction either in force or to be confirmed for the removal of office (B1a), light industrial (B1c) and storage (B8) to residential permitted development:

1. Barnet – B1a, B1c & B8 to C3 resi – Comes into force Sept 2019
2. Basingstoke & Deane - B1a, B1c & B8 to C3 – Comes into force Oct 2020
3. Bath & NE Somerset – B1a to resi – Came into force May 2019
4. Bracknell Forest – B1a to C3 – Came into force June 2017
5. Brent - B1a, B1c & B8 to C3 resi – Came into force Aug 2018
6. Brighton and Hove - B1a to resi – Came into force July 2014
7. Bromley - B1a to resi – Came into force July 2015
8. Broxbourne – - B1a to resi -Made 2013 – Came into force 2014
9. Calderdale - B1a to resi – Came into force November 2015
10. Camden - B1a to resi – Made Oct 2014
11. City of London – Exemption Area
12. Crawley - B1a and B8 to resi – Came into force July 2015
13. Croydon - B1a to resi – Came into force July 2016
14. Dacorum - B1a, B1c & B8 to C3 – Comes into force Jan 2020
15. Dudley - B1a to resi – Came into force April 2014
16. East Hampshire - B1a, B1c & B8 to C3 – Comes into force March 2019
17. Elmbridge - B1a to resi – Came into force Nov 2015
18. Epsom and Ewell - B1a to resi – Came into force February 2016
19. Greenwich - B1a to resi – Came into force Jan 2015
20. Hackney - B1a to resi – Came into force July 2016
21. Hammersmith & Fulham - B1a to resi – Came into force April 2018
22. Harlow - B1a to resi – Came into force August 2018
23. Harrogate - B1a to resi – Came into force March 2014
24. Hart - B1a, B1c & B8 to C3 – Comes into force May 2019
25. Hertsmere - B1a, B1c & B8 to C3 – Comes into force April 2020
26. Hillingdon - B1a to resi – Came into force Nov 2017
27. Hounslow - B1a to resi – Came into force Jan 2018
28. Islington - - B1a to resi - Made 2013 – Came into force 2014
29. Kingston upon Thames - B1a to resi – Came into force Oct 2015
30. Lambeth – Exemption Area
31. Lewes - B1a to resi – Came into force Nov 2018
32. Luton - B1a to resi – Came into force May 2018
33. Manchester – Exemption Area
34. Merton - B1a to resi – Came into force March 2015
35. Mole Valley - B1a to resi – Came into force Dec 2017
36. Old Oak & Park Royal Development Corporation (NFA) - B1a to resi – Came into force Sep 2017
37. Oxford - B1a to resi – Came into force March 2015
38. Richmond - B1a to resi – Came into force Nov 2014
39. Rushmoor - B1a, B1c & B8 to C3 resi – Came into force Feb 2018
40. Southwark – Exemption area replacement in force May 2019
41. St Albans - B1a to resi – Came into force March 2018
42. Stevenage – Exemption area
43. Sutton - B1a to resi Came into force Jan 2015
44. Telford and Wrekin - Came into force Oct 2017
45. Three Rivers - Came into force August 2017
46. Tower Hamlets – Exemption Area
47. Tunbridge Wells - B1a to resi – Came into force May 2018
48. Vale of White Horse – Exemption Area

49. Waltham Forest - B1a to resi came into force July 2018
50. Wandsworth – Exemption Area
51. Watford - B1a to resi came into force May 2017
52. Waverley - B1a, B1c & B8 to C3 resi – Came into force April 2019
53. West Oxfordshire - B1a to resi came into force March 2017
54. Westminster – Exemption Area
55. Wiltshire - B1a to resi came into force Nov 2016
56. Winchester - B1a to resi came into force Nov 2017
57. Wycombe - B1a to resi comes into force July 2020

Total: 56 LPAs + 1 Development corporation

Source: MHCLG, August 2019

Appendix 13: Prior approvals data for all English LPAs

Data consolidated from MHCLG live tables data showing the number of PDR change of use prior approvals received by local authorities across England 1 April 2015 – 31 March 2018 (our study period)[121]:

	Office to residential			**Retail and sui generis uses to residential**			**Agricultural to residential**			**From storage or distribution centres and light industrial to residential**			**Total prior approvals for changes to residential**			
Planning authority	Prior approval not required	Granted	Refused	Prior approval not required	Granted	Refused	Prior approval not required	Granted	Refused	Prior approval not required	Granted	Refused	Prior approval not required	Granted	Refused	Total
England	*2414*	*4309*	*1885*	*535*	*825*	*541*	*1668*	*3551*	*3167*	*67*	*124*	*130*	*4684*	*8809*	*5723*	*19216*
Adur	3	1	3	1	1	0	0	0	0	0	0	0	4	2	3	9
Allerdale	0	0	0	5	1	0	2	7	6	0	0	0	7	8	6	21
Amber Valley	1	1	0	1	0	0	5	10	5	0	0	0	7	11	5	23
Arun	0	0	1	0	0	0	0	1	0	0	0	0	0	1	1	2
Ashfield	3	1	1	2	1	1	0	1	3	0	0	0	5	3	5	13
Ashford	22	4	4	2	0	0	128	16	51	0	0	0	152	20	55	227
Aylesbury Vale	26	21	11	0	3	1	9	42	70	0	1	1	35	67	83	185
Babergh	0	13	3	0	2	3	2	44	18	0	0	1	2	59	25	86
Barking and Dagenham	1	11	9	1	3	4	0	0	0	0	0	0	2	14	13	29

[121] 'Table PDR1: district planning authorities' at https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#permitted-development-rights-tables

Barnet	0	101	43	0	12	9	0	1	1	0	0	0	0	114	53	167
Barnsley	0	6	6	2	0	1	0	8	0	0	0	0	2	14	7	23
Barrow-in-Furness	0	0	0	6	1	0	0	5	3	0	0	0	6	6	3	15
Basildon	9	4	7	0	0	0	0	0	4	0	1	0	9	5	11	25
Basingstoke and Deane	11	27	5	0	0	0	2	14	6	0	2	0	13	43	11	67
Bassetlaw	4	0	1	2	0	0	3	2	11	0	1	0	9	3	12	24
Bath and North East Somerset	0	13	2	0	2	2	0	41	19	0	1	3	0	57	26	83
Bedford	27	16	5	8	1	1	11	31	18	1	0	0	47	48	24	119
Bexley	9	27	8	3	6	3	0	0	0	0	0	2	12	33	13	58
Birmingham	43	55	8	28	5	1	3	2	0	0	0	0	74	62	9	145
Blaby	0	0	0	1	0	0	0	0	6	0	1	0	1	1	6	8
Blackburn with Darwen	0	1	0	2	2	0	1	4	0	0	0	0	3	7	0	10
Blackpool	0	10	5	0	9	2	0	0	0	0	0	0	0	19	7	26
Bolsover	3	0	0	5	0	0	0	0	5	0	0	0	8	0	5	13
Bolton	6	7	3	3	3	0	2	3	3	0	1	0	11	14	6	31
Boston	3	0	0	0	0	0	0	2	3	0	0	0	3	2	3	8
Bournemouth	1	44	6	0	35	6	0	0	0	0	3	1	1	82	13	96
Bracknell Forest	2	30	10	0	2	1	0	6	3	0	0	0	2	38	14	54
Bradford	35	7	4	8	0	4	26	8	23	0	0	0	69	15	31	115
Braintree	5	10	3	0	0	0	22	6	1	1	0	0	28	16	4	48
Breckland	1	2	0	0	0	2	0	23	48	1	0	2	2	25	52	79
Brent	1	71	59	1	18	18	0	0	0	0	0	0	2	89	77	168
Brentwood	14	15	8	1	1	0	4	5	11	0	0	0	19	21	19	59
Brighton and Hove	3	42	30	0	15	18	0	0	0	0	0	0	3	57	48	108
Bristol, City of	0	91	23	0	24	6	0	0	2	0	1	0	0	116	31	147
Broadland	0	9	1	0	2	0	0	16	9	0	0	0	0	27	10	37
Bromley	0	85	48	0	16	10	0	0	2	0	1	0	0	102	60	162

Bromsgrove	0	1	1	0	0	0	11	22	13	0	0	0	11	23	14	48
Broxbourne	5	15	0	0	1	3	3	4	5	0	0	1	8	20	9	37
Broxtowe	7	0	0	2	0	0	0	2	0	0	0	1	9	2	1	12
Burnley	3	5	0	2	1	0	0	6	6	0	0	0	5	12	6	23
Bury	0	2	1	3	0	0	1	0	4	0	0	0	4	2	5	11
Calderdale	8	5	5	2	0	0	12	5	28	0	0	0	22	10	33	65
Cambridge	0	8	1	0	0	0	0	0	0	0	0	0	0	8	1	9
Camden	0	35	10	0	2	5	0	0	0	0	2	3	0	39	18	57
Cannock Chase	4	1	0	1	0	0	1	0	0	0	0	0	6	1	0	7
Canterbury	14	4	2	0	0	0	10	0	4	1	0	0	25	4	6	35
Carlisle	12	8	1	4	3	0	6	5	0	0	0	0	22	16	1	39
Castle Point	9	2	3	1	0	0	2	0	0	0	0	0	12	2	3	17
Central Bedfordshire	10	18	7	2	4	0	0	35	31	0	0	1	12	57	39	108
Charnwood	3	1	2	2	1	0	0	5	6	0	0	1	5	7	9	21
Chelmsford	16	15	3	0	0	0	2	11	14	1	0	0	19	26	17	62
Cheltenham	0	2	0	0	0	0	0	0	1	0	0	0	0	2	1	3
Cherwell	3	12	11	0	0	0	2	19	34	0	0	0	5	31	45	81
Cheshire East	18	16	10	4	9	3	30	29	41	0	0	1	52	54	55	161
Cheshire West and Chester	9	4	3	2	0	0	22	8	15	0	0	0	33	12	18	63
Chesterfield	3	1	0	0	0	0	0	0	0	0	0	0	3	1	0	4
Chichester	3	3	1	0	0	0	9	37	6	0	0	0	12	40	7	59
Chiltern	29	10	16	2	3	2	0	5	10	0	0	0	31	18	28	77
Chorley	1	8	0	0	3	0	13	6	6	1	0	0	15	17	6	38
Christchurch	2	1	1	2	3	1	0	1	3	0	0	0	4	5	5	14
City of London	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Colchester	14	3	1	0	0	0	7	3	1	0	0	0	21	6	2	29
Copeland	0	0	0	0	0	0	8	5	0	0	0	0	8	5	0	13
Corby	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1
Cornwall	36	1	5	2	0	4	59	6	85	2	0	5	99	7	99	205

Cotswold	0	1	0	0	0	0	1	0	0	0	0	0	1	1	0	2
Coventry	8	8	6	0	1	1	1	0	1	0	0	0	9	9	8	26
Craven	3	1	0	0	0	1	7	9	17	0	0	0	12	8	18	38
Crawley	5	28	18	0	0	0	0	0	0	0	0	0	5	28	18	51
Croydon	0	81	23	0	29	20	0	0	0	0	4	1	0	114	44	158
Dacorum	40	55	30	2	0	0	23	31	23	0	0	0	65	86	53	204
Darlington	1	0	0	0	0	0	1	0	1	0	0	0	2	0	1	3
Dartford	6	7	8	0	2	0	0	1	0	0	0	0	6	10	8	24
Daventry	0	3	0	0	1	1	22	92	32	0	0	0	22	96	33	151
Derby	2	21	0	1	4	0	0	0	0	0	0	0	3	25	0	28
Derbyshire Dales	3	0	0	1	1	0	5	39	22	0	0	1	9	40	23	72
Doncaster	25	2	0	5	0	1	3	5	0	0	0	0	33	7	1	41
Dover	3	2	2	0	5	1	10	15	28	0	0	1	13	22	32	67
Dudley	3	46	2	1	15	1	0	1	1	0	0	0	4	62	4	70
County Durham	8	3	1	1	1	0	1	22	19	0	1	0	10	27	20	57
Ealing	65	52	31	0	0	0	0	0	0	0	3	1	65	55	32	152
East Cambridgeshire	5	0	0	0	0	0	0	36	11	0	0	0	5	36	11	52
East Devon	3	2	0	0	2	1	9	53	34	0	0	0	12	57	35	104
East Dorset	2	10	2	0	0	0	1	9	14	1	1	1	4	20	17	41
East Hampshire	1	3	0	0	1	2	3	23	6	0	3	0	4	30	8	42
East Hertfordshire	7	12	5	0	0	0	0	16	35	1	0	0	8	28	40	76
East Lindsey	1	6	2	0	2	0	6	60	15	0	0	0	7	68	17	92
East Northamptonshire	2	1	0	0	2	0	0	0	2	0	0	0	2	3	2	7
East Riding of Yorkshire	0	3	4	1	1	3	0	6	17	0	1	0	1	11	24	36
East Staffordshire	3	5	1	2	0	0	0	45	34	0	0	1	5	50	36	91
Eastbourne	7	6	0	4	7	5	0	0	0	0	0	0	11	13	5	29

Eastleigh	7	4	1	4	0	0	1	0	1	0	0	0	12	4	2	18
Eden	0	0	0	0	0	0	3	150	3	0	0	0	3	150	3	156
Elmbridge	19	26	7	0	5	0	0	1	0	0	0	3	19	32	10	61
Enfield	34	8	24	17	5	19	1	0	1	0	0	0	52	13	44	109
Epping Forest	6	7	1	0	2	0	0	20	15	0	0	0	6	29	16	51
Epsom and Ewell	12	9	5	0	0	0	0	0	0	0	0	0	12	9	5	26
Erewash	5	1	0	3	0	0	0	10	3	0	0	0	8	11	3	22
Exeter	7	5	1	2	0	0	0	0	0	0	0	0	9	5	1	15
Fareham	47	36	0	3	2	0	2	0	0	0	0	0	52	38	0	90
Fenland	0	5	4	2	0	1	6	34	19	0	0	1	8	39	25	72
Forest Heath	0	5	1	0	0	0	0	14	4	0	0	1	0	19	6	25
Forest of Dean	0	1	0	0	2	2	15	11	26	0	0	0	15	14	28	57
Fylde	0	0	1	0	0	0	3	0	6	0	0	0	3	0	7	10
Gateshead	0	6	2	0	0	0	0	2	1	0	0	0	0	8	3	11
Gedling	5	0	0	0	0	1	2	0	0	0	0	0	7	0	1	8
Gloucester	0	11	0	0	0	0	0	0	0	0	0	0	0	11	0	11
Gosport	2	0	0	2	0	1	0	0	0	0	0	1	4	0	2	6
Gravesham	5	1	5	0	0	0	3	4	5	0	0	0	8	5	10	23
Great Yarmouth	0	3	1	2	2	2	1	4	4	0	1	0	3	10	7	20
Greenwich	4	35	25	0	0	0	0	0	0	0	0	0	4	35	25	64
Guildford	0	22	5	1	1	0	0	9	10	0	0	0	1	32	15	48
Hackney	8	20	17	8	34	20	0	4	2	1	1	0	17	59	39	115
Halton	1	4	0	0	2	0	0	0	0	0	0	0	1	6	0	7
Hambleton	3	0	1	0	0	0	21	16	16	1	0	0	25	16	17	58
Hammersmith and Fulham	1	106	85	0	6	3	0	0	0	0	0	0	1	112	88	201
Harborough	2	0	2	0	0	0	34	6	15	0	0	0	36	6	17	59
Haringey	24	18	21	8	7	12	0	0	0	6	4	4	38	29	37	104
Harlow	17	7	7	0	0	6	0	0	0	0	0	0	17	7	13	37
Harrogate	25	0	1	2	0	0	10	26	22	1	0	1	38	26	24	88

Harrow	6	66	32	0	4	13	0	2	4	0	0	3	6	72	52	130
Hart	4	45	8	0	2	1	1	13	6	1	1	0	6	61	15	82
Hartlepool	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	1
Hastings	4	4	1	3	2	0	0	0	0	0	0	0	7	6	1	14
Havant	2	10	1	1	10	1	0	2	1	0	0	0	3	22	3	28
Havering	0	50	16	0	1	0	0	1	1	0	0	0	0	52	17	69
Herefordshire, County of	5	2	3	0	5	8	35	50	46	1	0	1	41	57	58	156
Hertsmere	24	8	12	3	1	4	0	0	0	0	0	0	27	9	16	52
High Peak	1	2	0	0	3	1	3	5	1	0	0	0	4	10	2	16
Hillingdon	22	52	34	1	5	6	0	0	1	0	0	0	23	57	41	121
Hinckley and Bosworth	2	8	0	0	0	0	1	7	1	1	1	0	4	16	1	21
Horsham	0	35	8	0	4	2	3	30	70	0	6	7	3	75	87	165
Hounslow	82	71	11	1	1	0	0	0	0	2	2	0	85	74	11	170
Huntingdonshire	1	23	1	0	0	0	4	74	15	1	6	0	6	103	16	125
Hyndburn	4	1	0	0	3	0	1	5	6	0	0	0	5	9	6	20
Ipswich	6	20	4	2	7	1	0	0	0	0	0	0	8	27	5	40
Isle of Wight	3	4	0	4	6	2	28	46	16	0	2	0	35	58	18	111
Isles of Scilly	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Islington	0	25	21	0	3	16	0	0	0	0	1	0	0	29	37	66
Kensington and Chelsea	0	0	1	2	1	2	0	0	0	0	0	0	2	1	3	6
Kettering	13	5	1	1	4	1	0	7	8	0	0	0	14	16	10	40
King's Lynn and West Norfolk	1	3	4	0	2	2	1	36	15	0	0	0	2	41	21	64
Kingston upon Hull, City of	5	19	0	0	0	0	0	0	0	0	0	0	5	19	0	24
Kingston upon Thames	1	37	32	1	16	15	0	0	0	0	1	0	2	54	47	103
Kirklees	0	13	14	0	6	1	0	16	14	0	0	0	0	35	29	64
Knowsley	0	0	1	1	0	0	0	1	0	0	0	0	1	1	1	3
Lambeth	2	75	63	2	18	13	0	0	0	0	3	1	4	96	77	177

Lancaster	1	3	0	0	1	0	0	25	11	0	0	0	1	29	11	41
Leeds	2	83	8	0	8	1	0	14	15	0	0	0	2	105	24	131
Leicester	2	56	4	0	10	0	0	0	0	0	0	0	2	66	4	72
Lewes	0	4	2	1	1	0	1	11	3	0	0	0	2	16	5	23
Lewisham	30	7	32	14	2	22	0	0	0	0	0	2	44	9	56	109
Lichfield	0	0	0	0	0	0	28	4	12	0	0	0	28	4	12	44
Lincoln	0	3	1	0	1	0	0	0	0	0	0	0	0	4	1	5
Liverpool	2	30	7	1	1	0	0	0	0	0	0	0	3	31	7	41
Luton	17	44	20	4	7	6	0	0	0	0	0	0	21	51	26	98
Maidstone	28	15	5	2	5	1	23	70	28	1	1	2	54	91	36	181
Maldon	0	4	9	0	0	2	0	15	39	0	0	0	0	19	50	69
Malvern Hills	1	2	7	1	2	0	10	12	57	3	1	1	15	17	65	97
Manchester	0	36	10	21	9	1	0	0	0	0	2	0	21	47	11	79
Mansfield	0	4	0	1	0	1	2	0	0	0	0	0	3	4	1	8
Medway	17	5	4	11	1	1	0	4	2	0	0	0	28	10	7	45
Melton	0	0	0	0	0	0	34	31	10	0	0	0	34	31	10	75
Mendip	8	0	3	0	3	0	21	20	38	0	1	0	29	24	41	94
Merton	32	38	26	16	14	10	0	0	0	0	4	2	48	56	38	142
Mid Devon	5	1	2	1	2	0	75	55	63	1	2	2	82	60	67	209
Mid Suffolk	0	6	4	0	2	0	1	57	45	0	0	0	1	65	49	115
Mid Sussex	0	27	7	0	4	0	1	9	6	1	0	0	2	40	13	55
Middlesbrough	3	2	0	6	1	0	0	0	0	0	0	0	9	3	0	12
Milton Keynes	7	31	4	1	1	0	2	7	6	0	0	0	10	39	10	59
Mole Valley	5	44	16	2	1	0	3	13	28	0	1	3	10	59	47	116
New Forest	16	6	4	0	0	1	10	1	10	0	0	1	26	7	16	49
Newark and Sherwood	5	0	1	0	0	1	15	11	23	1	0	0	21	11	25	57
Newcastle upon Tyne	15	27	9	0	5	0	0	1	1	0	0	0	15	33	10	58
Newcastle-under-Lyme	4	5	1	0	1	0	4	11	1	1	1	0	9	18	2	29
Newham	10	13	19	0	13	16	0	0	0	0	1	0	10	27	35	72

North Devon	2	2	0	1	3	0	3	151	39	0	0	1	6	156	40	202
North Dorset	0	6	0	0	1	0	0	42	9	0	8	0	0	57	9	66
North East Derbyshire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
North East Lincolnshire	2	1	0	4	0	0	0	0	0	0	0	0	6	1	0	7
North Hertfordshire	13	6	2	0	0	0	7	9	3	0	0	0	20	15	5	40
North Kesteven	1	1	1	0	0	0	0	9	15	0	0	0	1	10	16	27
North Lincolnshire	7	4	5	4	1	1	0	5	6	0	0	0	11	10	12	33
North Norfolk	4	3	3	0	0	1	13	5	24	0	1	0	17	9	28	54
North Somerset	2	38	12	0	7	2	1	77	43	2	1	0	5	123	57	185
North Tyneside	0	8	1	0	3	0	0	0	0	0	0	0	0	11	1	12
North Warwickshire	3	0	1	1	0	1	7	0	2	1	0	1	12	0	5	17
North West Leicestershire	0	1	0	2	1	0	2	8	2	0	0	0	4	10	2	16
Northampton	14	10	2	2	1	1	0	0	0	0	0	0	16	11	3	30
Northumberland	0	9	1	0	3	0	7	16	13	0	0	1	7	28	15	50
Norwich	4	25	4	0	0	0	0	0	0	0	0	0	4	25	4	33
Nottingham	21	14	0	3	2	1	0	0	0	0	1	0	24	17	1	42
Nuneaton and Bedworth	6	3	1	4	3	0	0	0	0	0	0	0	10	6	1	17
Oadby and Wigston	4	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0
Oldham	0	10	0	0	7	0	0	6	0	0	1	0	0	24	0	24
Oxford	3	21	1	0	2	0	0	0	0	0	0	0	3	23	1	27
Pendle	4	0	0	0	0	0	16	11	5	0	0	0	20	11	5	36
Peterborough	20	7	3	4	0	2	2	2	0	0	0	0	26	9	5	40
Plymouth	36	12	16	2	1	0	0	0	0	0	0	0	38	13	16	67
Poole	0	23	1	0	3	1	1	6	0	0	0	0	1	32	2	35
Portsmouth	13	7	2	7	1	3	0	0	0	0	0	1	20	8	6	34
Preston	8	13	2	3	2	0	8	3	12	0	0	0	19	18	14	51

Purbeck	1	0	0	0	0	0	0	5	2	0	0	0	1	5	2	8
Reading	0	58	13	0	11	3	0	0	0	0	1	0	0	70	16	86
Redbridge	7	25	20	6	6	5	0	0	0	0	0	2	13	31	27	71
Redcar & Cleveland	0	0	0	0	0	0	3	1	0	0	0	0	3	1	0	4
Redditch	11	2	0	0	0	0	4	5	5	0	0	0	15	7	5	27
Reigate and Banstead	46	1	7	12	0	3	1	0	17	1	0	15	60	1	42	103
Ribble Valley	0	3	1	0	0	0	1	14	29	0	0	0	1	17	30	48
Richmond upon Thames	0	81	46	0	7	3	0	0	0	0	0	0	0	88	49	137
Richmondshire	0	0	0	1	0	0	2	1	7	0	0	0	3	1	7	11
Rochdale	0	7	9	0	1	0	0	0	1	0	0	0	0	8	10	18
Rochford	1	3	0	0	0	0	4	7	7	0	0	0	5	10	7	22
Rossendale	2	1	0	0	0	0	4	8	5	0	0	0	6	9	5	20
Rother	10	2	2	2	0	1	3	2	4	0	1	0	15	5	7	27
Rotherham	0	23	2	0	2	2	0	6	10	0	0	0	0	31	14	45
Rugby	6	3	0	2	2	0	15	36	3	1	0	0	24	41	3	68
Runnymede	5	21	1	0	1	1	1	0	0	0	0	0	6	22	2	30
Rushcliffe	2	3	1	1	0	0	8	5	12	0	0	0	11	8	13	32
Rushmoor	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rutland	2	0	0	0	0	0	11	3	8	0	0	0	13	3	8	24
Ryedale	0	1	2	0	0	0	0	6	7	0	0	0	0	7	9	16
Salford	2	19	7	0	0	1	0	1	0	0	0	0	2	20	8	30
Sandwell	17	5	0	5	6	2	0	0	0	0	0	0	22	11	2	35
Scarborough	9	0	2	2	1	0	0	0	2	0	0	0	11	1	4	16
Sedgemoor	2	2	2	0	3	1	2	19	38	0	0	0	4	24	41	69
Sefton	8	7	3	2	0	0	0	1	0	0	0	0	10	8	3	21
Selby	1	0	0	1	0	1	8	1	2	0	0	0	10	1	3	14
Sevenoaks	22	4	7	4	0	3	16	1	8	1	0	0	43	5	18	66
Sheffield	31	7	8	5	1	1	0	1	1	0	0	0	36	9	10	55
Shepway	6	3	3	4	0	2	0	3	7	0	0	0	10	6	12	28

Shropshire	12	1	1	6	2	0	60	15	47	1	0	0	79	18	48	145
Slough	41	9	5	5	0	1	0	0	0	0	0	0	46	9	6	61
Solihull	6	8	0	2	0	0	3	10	6	0	0	0	11	18	6	35
South Bucks	21	9	1	2	0	1	0	2	8	0	0	0	23	11	10	44
South Cambridgeshire	5	7	3	0	0	0	15	40	16	2	3	2	22	50	21	93
South Derbyshire	0	2	1	0	1	0	0	4	13	0	0	1	0	7	15	22
South Gloucestershire	1	12	6	1	5	1	0	48	46	1	1	1	3	66	54	123
South Hams	1	8	2	0	0	0	56	40	40	0	1	3	57	49	45	151
South Holland	0	4	0	0	0	0	0	2	3	0	0	0	0	6	3	9
South Kesteven	5	0	2	2	0	1	6	9	10	2	0	0	15	9	13	37
South Lakeland	0	2	0	0	0	0	7	6	4	0	0	0	7	8	4	19
South Norfolk	0	1	1	0	0	0	0	56	19	0	0	0	0	57	20	77
South Northamptonshire	0	2	0	0	2	1	0	26	7	0	0	0	0	30	8	38
South Oxfordshire	12	25	3	1	2	2	7	9	7	1	0	1	21	36	13	70
South Ribble	3	0	0	0	0	0	0	0	0	2	0	0	5	0	0	5
South Somerset	8	6	2	0	1	0	24	20	31	0	2	1	32	29	34	95
South Staffordshire	0	4	0	0	1	0	0	4	9	0	0	0	0	9	9	18
South Tyneside	0	3	1	0	0	0	0	0	0	0	0	0	0	3	1	4
Southampton	3	60	12	4	31	3	0	0	0	0	0	0	7	91	15	113
Southend-on-Sea	1	74	44	0	32	14	0	0	0	0	7	3	1	113	61	175
Southwark	4	29	8	2	6	11	0	0	0	0	0	1	6	35	20	61
Spelthorne	0	27	2	0	9	0	0	0	0	0	0	1	0	36	3	39
St Albans	34	13	20	0	4	4	2	4	11	1	0	6	37	21	41	99
St Edmundsbury	1	12	3	0	6	2	1	29	12	0	0	1	2	47	18	67
St. Helens	0	4	1	4	2	1	0	0	0	0	0	0	4	6	2	12

Stafford	1	6	3	0	1	0	2	11	24	0	0	0	3	18	27	48
Staffordshire Moorlands	0	4	1	0	0	1	3	33	16	1	0	0	4	37	18	59
Stevenage	9	1	4	0	0	0	0	0	0	0	0	0	9	1	4	14
Stockport	31	13	3	8	1	1	12	1	2	0	0	0	51	15	6	72
Stockton-on-Tees	4	0	0	0	0	0	0	0	0	2	0	0	6	0	0	6
Stoke-on-Trent	23	8	1	23	8	1	0	0	0	0	0	0	46	16	2	64
Stratford-on-Avon	10	11	6	0	0	1	22	77	64	0	3	3	32	91	74	197
Stroud	1	3	2	0	0	0	4	8	8	0	0	0	5	11	10	26
Suffolk Coastal	4	1	2	0	0	1	27	8	37	0	0	0	31	9	40	80
Sunderland	1	5	1	1	0	0	0	0	0	0	0	0	2	5	1	8
Surrey Heath	35	20	5	0	2	0	0	1	0	0	0	0	35	23	5	63
Sutton	0	55	24	0	19	8	0	0	0	0	0	0	0	74	32	106
Swale	3	2	2	2	0	0	27	9	11	0	0	0	32	11	13	56
Swindon	18	3	1	2	0	1	4	0	0	2	0	0	26	3	2	31
Tameside	14	1	0	7	1	0	2	0	1	0	0	0	23	2	1	26
Tamworth	3	0	0	0	0	1	0	0	0	0	0	0	3	0	1	4
Tandridge	0	17	9	0	0	2	0	7	22	0	2	0	0	26	33	59
Taunton Deane	0	10	0	0	2	0	0	60	25	0	0	1	0	72	26	98
Teignbridge	0	2	2	0	0	1	2	55	38	0	2	3	2	59	44	105
Telford and Wrekin	5	8	1	0	0	0	4	8	10	0	0	0	9	16	11	36
Tendring	6	0	0	7	0	0	25	0	3	0	0	0	38	0	3	41
Test Valley	12	2	3	2	1	1	31	13	31	0	0	1	45	16	36	97
Tewkesbury	0	2	1	0	0	0	0	14	3	0	0	0	0	16	4	20
Thanet	5	1	0	0	0	0	1	0	1	0	0	0	6	1	1	8
Three Rivers	0	19	12	0	1	0	0	10	11	0	0	0	0	30	23	53
Thurrock	5	1	2	0	1	1	10	0	1	0	0	0	15	2	4	21
Tonbridge and Malling	18	4	2	0	0	0	10	4	14	0	3	0	28	11	16	55
Torbay	7	2	0	5	0	1	0	0	2	0	0	0	12	2	3	17

Torridge	0	1	0	0	0	0	0	47	77	0	0	0	0	48	77	125
Tower Hamlets	6	14	7	0	0	2	0	0	0	0	0	0	6	14	9	29
Trafford	6	38	1	0	1	0	0	1	0	0	1	0	6	41	1	48
Tunbridge Wells	14	25	2	1	0	1	2	30	13	0	1	1	17	56	17	90
Uttlesford	14	2	11	2	0	0	42	13	26	2	3	1	60	18	38	116
Vale of White Horse	5	13	0	2	0	1	0	37	1	0	0	0	7	50	2	59
Wakefield	17	10	8	0	0	0	0	3	6	0	0	0	17	13	14	44
Walsall	10	15	4	1	0	2	0	0	2	0	0	0	11	15	8	34
Waltham Forest	6	19	14	3	11	12	0	0	0	0	0	0	9	30	26	65
Wandsworth	35	60	29	24	7	17	0	0	0	0	1	1	59	68	47	174
Warrington	22	1	4	4	0	2	3	0	2	2	0	0	31	1	8	40
Warwick	20	2	3	0	0	2	26	4	15	0	0	0	46	6	20	72
Watford	6	13	18	3	2	5	0	0	0	0	0	0	9	15	23	47
Waveney	5	2	3	6	3	1	22	9	5	0	0	0	33	14	9	56
Waverley	19	27	12	3	7	1	2	13	14	0	1	5	24	48	32	104
Wealden	9	19	1	1	9	1	9	15	13	1	0	1	20	43	16	79
Wellingborough	6	2	3	0	0	0	4	0	1	2	0	1	12	2	5	19
Welwyn Hatfield	6	11	11	0	0	0	1	1	3	0	0	0	7	12	14	33
West Berkshire	13	35	11	0	0	0	0	2	4	0	0	0	13	37	15	65
West Devon	0	7	7	0	0	0	9	97	45	0	0	0	9	104	52	165
West Dorset	1	3	1	0	0	0	4	20	13	0	0	0	5	23	14	42
West Lancashire	5	0	0	0	0	0	4	0	11	0	0	0	9	0	11	20
West Lindsey	0	0	0	0	0	0	7	7	5	0	0	0	7	7	5	19
West Oxfordshire	22	10	26	0	0	0	0	3	3	0	0	0	22	13	29	64
West Somerset	0	0	0	0	0	0	2	7	3	0	0	0	2	7	3	12
Westminster	0	19	7	0	0	7	0	0	0	0	0	0	0	19	14	33
Weymouth and Portland	0	0	0	4	0	0	0	0	0	0	0	0	4	0	0	4

Wigan	1	9	2	6	2	0	0	3	1	0	0	0	7	14	3	24
Wiltshire	14	22	9	2	2	1	33	72	91	4	3	4	53	99	105	257
Winchester	27	22	8	0	0	0	3	20	16	0	0	0	30	42	24	96
Windsor and Maidenhead	0	31	16	1	1	4	1	6	8	0	2	0	2	40	28	70
Wirral	22	7	3	1	0	0	0	0	0	0	0	0	23	7	3	33
Woking	3	27	6	0	1	0	0	0	3	0	0	0	3	28	9	40
Wokingham	3	39	5	0	2	1	3	6	7	0	1	1	6	48	14	68
Wolverhampton	4	6	0	8	8	0	0	0	0	0	0	0	12	14	0	26
Worcester	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Worthing	5	13	6	4	0	6	0	0	0	0	1	0	9	14	12	35
Wychavon	6	0	1	0	0	2	40	22	58	2	0	0	48	22	61	131
Wycombe	55	17	8	0	2	1	4	3	8	0	1	0	59	23	17	99
Wyre	0	2	1	0	2	0	1	21	17	0	0	0	1	25	18	44
Wyre Forest	6	8	0	0	1	0	9	11	17	0	0	0	15	20	17	52
York	0	28	2	0	5	0	0	7	6	0	0	0	0	40	8	48
National parks	*13*	*21*	*8*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*13*	*21*	*8*	*42*
Broads Authority	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3	3
Dartmoor National Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Exmoor National Park	5	5	0	0	0	0	0	0	0	0	0	0	5	5	0	10
Lake District National Park	1	5	3	0	0	0	0	0	0	0	0	0	1	5	3	9
New Forest National Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
North York Moors National Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northumberland National Park	0	1	1	0	0	0	0	0	0	0	0	0	0	1	1	2
Peak District National Park	5	6	1	0	0	0	0	0	0	0	0	0	5	6	1	12

South Downs National Park	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Yorkshire Dales National Park	2	3	0	0	0	0	0	0	0	0	0	0	2	3	0	5
Development corporations	*0*	*2*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*0*	*2*	*0*	*2*
Ebbsfleet Development Corporation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
London Legacy Development Corporation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Old Oak and Park Royal Development Corporation	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Appendix 14: Net additional dwellings data for all English LPAs

Data consolidated from MHCLG live tables data showing the number of new additional dwellings created under PDR for change of use 1 April 2015- 31 March 2018 (our study period) for all local authorities in England[122]:

Lower and Single Tier Authority Data	**Agricultural to residential**	**Office to residential**	**Storage and light industrial to residential**	**Any other to residential**	**Unspecified to residential**	**Total to residential**
England	1299	42130	489	2119	255	46292
Adur	0	2	0	2	0	4
Allerdale	3	0	0	0	0	3
Amber Valley	0	2	0	0	0	2
Arun	4	65	0	1	0	70
Ashfield	0	4	0	2	0	6
Ashford	26	69	0	1	0	96
Aylesbury Vale	41	120	0	27	0	188
Babergh	0	0	0	0	0	0
Barking and Dagenham	0	120	0	2	0	122
Barnet	0	626	15	6	0	647
Barnsley	2	3	1	4	0	10
Barrow-in-Furness	0	0	0	0	0	0
Basildon	6	482	0	20	0	508
Basingstoke and Deane	1	317	0	0	0	318
Bassetlaw	0	14	0	0	0	14
Bath and North East Somerset UA	14	60	5	5	0	84
Bedford UA	2	358	3	59	0	422
Bexley	0	22	0	13	0	35
Birmingham	0	1080	5	7	0	1092
Blaby	0	0	0	0	0	0
Blackburn with Darwen UA	0	0	0	0	0	0
Blackpool UA	1	32	1	15	0	49
Bolsover	0	1	0	2	0	3
Bolton	0	216	0	8	0	224
Boston	1	14	2	4	0	21
Bournemouth UA	0	164	1	4	0	169
Bracknell Forest UA	1	201	0	21	0	223

[122] 'Table 120: components of housing supply' at https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing

Bradford	4	464	0	19	0	487
Braintree	7	88	0	0	0	95
Breckland	2	0	0	0	0	2
Brent	0	422	0	8	0	430
Brentwood	0	46	0	0	0	46
Brighton and Hove UA	0	302	0	12	0	314
Bristol, City of UA	0	1030	0	8	0	1038
Broadland	15	1	0	9	0	25
Bromley	0	560	0	10	0	570
Bromsgrove	8	11	0	0	0	19
Broxbourne	6	161	0	0	0	167
Broxtowe	8	13	0	33	0	54
Burnley	0	68	0	2	0	70
Bury	1	1	0	3	0	5
Calderdale	3	55	0	3	0	61
Cambridge	0	1	0	0	0	1
Camden	0	525	0	3	0	528
Cannock Chase	0	45	0	2	0	47
Canterbury	0	19	2	0	0	21
Carlisle	0	0	0	0	0	0
Castle Point	0	1	0	8	0	9
Central Bedfordshire UA	7	136	4	63	0	210
Charnwood	0	11	0	2	0	13
Chelmsford	4	274	0	0	0	278
Cheltenham	0	14	0	0	0	14
Cherwell	3	43	0	0	0	46
Cheshire East UA	12	59	0	3	0	74
Cheshire West and Chester UA	0	0	0	0	0	0
Chesterfield	0	8	0	15	0	23
Chichester	1	32	0	1	0	34
Chiltern	2	186	7	0	0	195
Chorley	1	50	0	1	0	52
Christchurch	0	30	0	10	0	40
City of London	0	0	0	0	0	0
Colchester	0	289	0	0	0	289
Copeland	3	0	0	0	0	3
Corby	0	0	0	0	0	0
Cornwall UA	13	26	2	2	0	43
Cotswold	4	59	0	0	0	63
Coventry	0	324	0	0	0	324
Craven	7	40	0	0	0	47
Crawley	0	589	0	3	0	592
Croydon	0	2489	4	28	0	2521
Dacorum	2	200	0	1	0	203
Darlington UA	2	18	0	0	0	20
Dartford	1	28	0	2	0	31

Daventry	18	1	2	10	0	31
Derby UA	0	471	0	0	0	471
Derbyshire Dales	10	6	2	0	0	18
Doncaster	1	112	0	0	0	113
Dover	7	8	0	2	0	17
Dudley	0	418	0	0	0	418
County Durham UA	0	0	0	0	0	0
Ealing	0	253	11	8	0	272
East Cambridgeshire	2	15	0	0	0	17
East Devon	6	1	2	0	0	9
East Dorset	13	44	0	1	0	58
East Hampshire	7	7	0	0	0	14
East Hertfordshire	6	10	2	0	0	18
East Lindsey	10	16	7	27	0	60
East Northamptonshire	0	0	14	5	0	19
East Riding of Yorkshire UA	3	14	0	0	0	17
East Staffordshire	0	0	0	0	0	0
Eastbourne	0	56	1	7	0	64
Eastleigh	1	48	2	0	0	51
Eden	0	0	0	1	0	1
Elmbridge	0	109	0	6	0	115
Enfield	0	382	0	2	0	384
Epping Forest	6	22	0	1	0	29
Epsom and Ewell	0	111	0	2	0	113
Erewash	0	2	0	1	0	3
Exeter	0	66	0	0	0	66
Fareham	1	139	1	0	0	141
Fenland	7	7	0	7	0	21
Forest Heath	1	46	1	38	0	86
Forest of Dean	0	0	0	0	0	0
Fylde	0	1	0	0	0	1
Gateshead	1	31	0	0	0	32
Gedling	0	11	0	0	0	11
Gloucester	0	98	0	0	0	98
Gosport	0	16	0	2	0	18
Gravesham	1	69	0	1	0	71
Great Yarmouth	0	1	0	2	0	3
Greenwich	0	104	1	6	0	111
Guildford	1	153	2	29	0	185
Hackney	0	66	0	22	0	88
Halton UA	0	0	0	0	0	0
Hambleton	4	1	31	0	0	36
Hammersmith and Fulham	0	413	3	15	0	431
Harborough	3	0	0	0	0	3
Haringey	0	173	1	10	0	184

Harlow	0	292	18	1	0	311
Harrogate	6	70	1	2	0	79
Harrow	0	749	0	9	0	758
Hart	3	180	0	0	0	183
Hartlepool UA	0	0	0	0	0	0
Hastings	0	33	1	14	0	48
Havant	0	18	0	20	0	38
Havering	1	168	0	1	0	170
Herefordshire, County of UA	39	0	0	1	0	40
Hertsmere	0	152	7	2	0	161
High Peak	1	1	0	0	0	2
Hillingdon	0	513	0	7	0	520
Hinckley and Bosworth	3	45	0	1	14	63
Horsham	7	205	0	0	0	212
Hounslow	0	605	0	3	0	608
Huntingdonshire	14	159	3	4	0	180
Hyndburn	1	0	0	0	0	1
Ipswich	0	260	0	1	0	261
Isle of Wight UA	28	1	3	5	0	37
Isles of Scilly UA	0	0	0	0	0	0
Islington	0	489	0	6	0	495
Kensington and Chelsea	0	0	0	2	0	2
Kettering	0	5	0	1	0	6
King's Lynn and West Norfolk	5	0	0	0	0	5
Kingston upon Hull, City of UA	0	69	0	0	0	69
Kingston upon Thames	0	276	3	15	0	294
Kirklees	1	66	0	0	0	67
Knowsley	0	0	0	0	0	0
Lambeth	0	685	1	9	0	695
Lancaster	10	7	0	0	9	26
Leeds	3	687	0	0	0	690
Leicester UA	0	387	1	13	0	401
Lewes	4	81	0	0	0	85
Lewisham	0	274	0	18	0	292
Lichfield	7	4	0	0	0	11
Lincoln	0	30	8	1	0	39
Liverpool	0	109	0	0	0	109
Luton UA	0	486	0	0	0	486
Maidstone	25	471	0	2	17	515
Maldon	6	13	1	0	0	20
Malvern Hills	10	12	0	0	0	22
Manchester	0	497	0	0	0	497
Mansfield	0	0	0	0	0	0
Medway UA	0	52	0	9	0	61
Melton	8	1	1	22	0	32

Mendip	8	5	5	0	0	18
Merton	0	398	9	14	0	421
Mid Devon	67	3	0	39	0	109
Mid Suffolk	0	0	0	0	0	0
Mid Sussex	0	282	0	0	0	282
Middlesbrough UA	0	17	6	40	0	63
Milton Keynes UA	3	124	0	12	0	139
Mole Valley	5	253	0	4	3	265
New Forest	4	66	8	5	0	83
Newark and Sherwood	2	18	1	1	0	22
Newcastle upon Tyne	1	366	0	0	0	367
Newcastle-under-Lyme	7	248	2	12	0	269
Newham	0	150	5	9	0	164
North Devon	14	2	0	2	0	18
North Dorset	7	2	0	0	0	9
North East Derbyshire	7	0	0	0	0	7
North East Lincolnshire UA	0	0	0	0	0	0
North Hertfordshire	3	61	0	0	0	64
North Kesteven	2	1	0	0	0	3
North Lincolnshire UA	5	7	0	50	0	62
North Norfolk	5	0	0	1	0	6
North Somerset UA	28	112	3	2	0	145
North Tyneside	0	95	0	51	0	146
North Warwickshire	0	8	0	0	0	8
North West Leicestershire	2	0	0	2	0	4
Northampton	0	78	1	4	0	83
Northumberland UA	1	54	1	3	0	59
Norwich	0	249	0	5	0	254
Nottingham UA	0	905	0	0	0	905
Nuneaton and Bedworth	0	101	0	0	0	101
Oadby and Wigston	0	15	0	0	0	15
Oldham	3	1	0	1	0	5
Oxford	0	66	0	4	0	70
Pendle	1	0	0	0	0	1
Peterborough UA	3	555	6	42	0	606
Plymouth UA	0	30	0	0	0	30
Poole UA	0	124	0	0	0	124
Portsmouth UA	0	143	0	10	0	153
Preston	6	59	0	8	0	73
Purbeck	2	1	0	0	0	3
Reading UA	0	636	3	7	0	646
Redbridge	0	313	19	8	0	340
Redcar and Cleveland UA	0	1	0	0	0	1
Redditch	5	101	0	4	0	110
Reigate and Banstead	0	250	3	8	0	261

Ribble Valley	1	0	0	0	0	1
Richmond upon Thames	0	529	2	4	0	535
Richmondshire	0	0	0	0	0	0
Rochdale	0	60	0	1	0	61
Rochford	2	2	0	1	0	5
Rossendale	4	28	0	0	0	32
Rother	1	40	0	6	0	47
Rotherham	0	22	0	2	0	24
Rugby	5	122	0	1	0	128
Runnymede	1	148	0	5	0	154
Rushcliffe	3	19	1	0	0	23
Rushmoor	0	29	0	0	0	29
Rutland UA	6	5	0	0	0	11
Ryedale	7	2	1	5	0	15
Salford	0	34	0	0	0	34
Sandwell	0	161	0	4	7	172
Scarborough	0	27	0	2	0	29
Sedgemoor	10	10	0	1	0	21
Sefton	0	198	0	0	0	198
Selby	4	3	1	0	0	8
Sevenoaks	7	70	1	6	0	84
Sheffield	1	1018	0	25	0	1044
Shepway	2	30	2	5	0	39
Shropshire UA	31	76	0	11	0	118
Slough UA	0	639	0	77	0	716
Solihull	7	109	0	4	0	120
South Bucks	0	202	0	0	0	202
South Cambridgeshire	19	23	1	1	0	44
South Derbyshire	1	1	0	0	0	2
South Gloucestershire UA	24	47	0	4	0	75
South Hams	17	1	0	0	0	18
South Holland	2	16	1	2	0	21
South Kesteven	1	0	0	0	0	1
South Lakeland	4	25	0	0	0	29
South Norfolk	2	0	0	0	0	2
South Northamptonshire	2	4	0	0	0	6
South Oxfordshire	3	76	0	0	0	79
South Ribble	4	1	0	0	150	155
South Somerset	9	64	0	62	0	135
South Staffordshire	1	2	1	0	0	4
South Tyneside	0	14	0	3	0	17
Southampton UA	0	491	15	9	0	515
Southend-on-Sea UA	0	229	2	8	0	239
Southwark	0	66	0	7	0	73
Spelthorne	0	263	2	0	0	265
St Albans	0	157	0	0	0	157

St Edmundsbury	7	57	2	42	0	108
St. Helens	3	18	6	36	0	63
Stafford	17	17	2	0	0	36
Staffordshire Moorlands	4	5	0	0	0	9
Stevenage	0	512	7	0	0	519
Stockport	0	80	0	0	0	80
Stockton-on-Tees UA	0	0	0	0	0	0
Stoke-on-Trent UA	1	24	0	1	0	26
Stratford-on-Avon	20	37	0	1	37	95
Stroud	5	1	0	0	0	6
Suffolk Coastal	8	4	0	0	0	12
Sunderland	0	220	49	25	0	294
Surrey Heath	0	160	0	2	0	162
Sutton	0	660	10	5	0	675
Swale	10	41	1	0	0	52
Swindon UA	0	376	0	3	0	379
Tameside	0	12	0	6	0	18
Tamworth	0	1	0	0	0	1
Tandridge	2	39	0	1	0	42
Taunton Deane	10	21	1	0	0	32
Teignbridge	13	39	1	0	0	53
Telford and Wrekin UA	2	2	0	0	0	4
Tendring	4	1	1	2	0	8
Test Valley	11	66	0	1	0	78
Tewkesbury	0	0	0	0	0	0
Thanet	4	0	0	1	0	5
Three Rivers	3	136	1	0	0	140
Thurrock UA	4	0	0	0	0	4
Tonbridge and Malling	17	114	0	0	0	131
Torbay UA	0	7	0	1	0	8
Torridge	12	0	0	0	0	12
Tower Hamlets	0	379	2	0	0	381
Trafford	0	162	1	0	0	163
Tunbridge Wells	11	153	3	0	0	167
Uttlesford	22	46	0	0	0	68
Vale of White Horse	20	0	0	0	3	23
Wakefield	0	222	0	0	0	222
Walsall	0	0	0	0	0	0
Waltham Forest	0	187	2	25	0	214
Wandsworth	0	326	0	26	0	352
Warrington UA	0	125	13	45	0	183
Warwick	4	118	8	1	0	131
Watford	0	159	0	10	0	169
Waveney	3	6	0	1	0	10
Waverley	0	227	31	10	6	274
Wealden	0	0	0	0	0	0

Wellingborough	0	71	0	0	0	71
Welwyn Hatfield	3	305	0	0	0	308
West Berkshire UA	0	193	0	9	0	202
West Devon	32	1	0	0	0	33
West Dorset	6	57	3	0	0	66
West Lancashire	0	2	0	0	0	2
West Lindsey	27	0	0	1	0	28
West Oxfordshire	0	45	0	0	0	45
West Somerset	2	0	0	2	0	4
Westminster	0	12	0	0	0	12
Weymouth and Portland	0	2	2	4	0	8
Wigan	0	9	0	32	0	41
Wiltshire UA	19	10	0	41	3	73
Winchester	8	79	0	0	0	87
Windsor and Maidenhead UA	0	111	0	0	0	111
Wirral	0	30	4	5	0	39
Woking	0	112	0	2	0	114
Wokingham UA	0	120	0	0	0	120
Wolverhampton	0	44	14	4	0	62
Worcester	0	79	0	0	0	79
Worthing	0	138	0	1	0	139
Wychavon	61	33	40	50	6	190
Wycombe	2	355	0	2	0	359
Wyre	4	6	0	4	0	14
Wyre Forest	11	28	0	3	0	42
York UA	26	222	0	282	0	530

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Dr Jessica Ferm

Jessica Ferm is a Lecturer at the Bartlett School of Planning, University College London. She is a practice-focused academic with research interests in spatial planning, economic development and social justice and has published widely on these topics in Urban Studies, European Planning Studies, Planning Practice and Research, Journal of Corporate Real Estate. She is co-editor of a book on Planning Practice in the UK, (Routledge, 2018) and co-author of Understanding the Impacts of Deregulation in Planning: Turning offices into homes (Palgrave Macmillan, 2019). She has worked on research projects for the RICS Research Trust and is currently a Co-Investigator on an ESRC project, What is Governed, which compares residential investment landscapes and the governance and regulation of housing production in London, Amsterdam and Paris. Jessica is active in planning practice and policy in London, she is a member of Just Space Economy and Planning, the London Planning and Development Forum, the Economics Roundtable for London and the GLA Industrial and Logistics Sounding Board. Prior to becoming a lecturer, Jessica worked for ten years as a planning consultant and in public practice for a North London planning authority.

Dr Nicola Livingstone

Dr Nicola Livingstone is Associate Professor of Real Estate at the Bartlett School of Planning, UCL. Before coming to UCL she worked as a lecturer at Heriot-Watt University, where she completed her PhD. Her background is in real estate and urban studies. Nicola has published widely on these topics and has recently been working on projects examining real estate investment trends, the evolution of the retail market, the impacts of changes to the planning system on cities and housing markets, the political economy of charity, and food insecurity. In 2018, Nicola has completed funded research work for both the RICS and the British Academy/Leverhulme.

Professor Alex Lord

Alexander Lord is Lever Chair in Town and Regional Planning at the University of Liverpool. He has published widely on various aspects of urban planning and economic geography from a behavioural insights perspective and has led numerous grant-funded projects including multiple large awards by the Economic and Social Research Council. He currently leads an ESRC-NSFC (China) collaborative project from 2019-2022. Alex also led the consortium that produced the valuation of developer contributions for the Ministry for Housing Communities and Local Government in 2018 and again in 2019. Alex served as head of the Discipline of Planning between 2014-2019.

Dr Richard Dunning

Richard Dunning is Lecturer in Planning at the University of Liverpool. He is the Treasurer of the Housing Studies Association. His research focuses on understanding housing markets, with a particular emphasis on behavioural interpretations. He has wide-ranging experience in undertaking quantitative and qualitative research in private practice, for research bodies and public governments, covering local, national and international real estate economics. He has recently undertaken work on housing and behavioural research projects for MHCLG, RICS, Shelter Scotland, ESRC, Joseph Rowntree Foundation and small charities and housing associations.