

# **THREE RIVERS SITE ALLOCATIONS DPD EXAMINATION**

---

On behalf of Transport for London, Commercial  
Development Directorate

Respondent Number: 6018 2/300 48/SA

## **Issue 3**

30 September 2013

---

## Issue 3

### ISSUE 3: WHETHER THE SALDD PROVIDES SATISFACTORILY FOR THE AMOUNT AND TYPE OF LOCAL EMPLOYMENT, SHOPPING AND GREEN INFRASTRUCTURE ENVISAGED BY THE CORE STRATEGY.

- 1.1 CBRE Limited (CBRE) is instructed by Transport for London Commercial Development Directorate, Property (TfL Property).
- 1.2 This Statement responds to the Inspector’s Question 3.4.

#### Q3.4 : Whether the greater scope for converting offices to housing implicit in recent changes to permitted development rights will exert a material influence on these factors.

- 1.3 Class J of Part 3 of Schedule 2 to the The Town and Country Planning (General Permitted Development) Order 1995 relating specifically to the change of use from office to residential came into effect in May 2013. This followed the submission of representations to the Proposed Submission SALDD in December 2012. As such, whilst representations were not submitted by CBRE on behalf of TfL Property on this matter in December 2012, the Inspector’s question is considered relevant to our case. TRDC<sup>1</sup> suggest that the introduction of permitted development rights for changes from office to residential would increase and further support the Council’s delivery of housing. We do not consider that this will exert a material influence on the land use across the District.
- 1.4 Core Strategy Policy CP6 acknowledges that it is anticipated that there will be an oversupply of office space over the plan period and recognises that the release of office space from employment use will be acceptable if supported by an up to date Employment Land Study. As such, TRDC had at the time of the Core Strategy anticipated that there would be windfall housing development resulting from the release of surplus office stock.
- 1.5 The change in the permitted development rights to allow the change of use from offices to housing is currently in place for a temporary period of 3 years, ending May 2016. As the Regulations currently stand, in order to be lawful, units have to be used for C3 use by May 2016. Whilst these new rights speed up the approval process, prior approval is still required from TRDC and therefore we do not consider this to materially change the existing policy position. It is not known if the change to the permitted development will be extended beyond this temporary period of 3 years. To date we understand that TRDC have only received 2 applications for Prior Approval, one application to create 2 dwellings and the second to create 12 dwellings.

### CONCLUDING STATEMENT

- 1.6 For the reasons set out above it is not considered that the change to the permitted development rights will exert a material influence on the land use across the District or housing supply.

---

<sup>1</sup> TRDC letter 31 July 2013