The English Experience of Soft Densification

Phase II Draft Report
February 2016

Peter Bibby\textsuperscript{1}, Richard Dunning\textsuperscript{1}, Ed Ferrari\textsuperscript{1}, Jean-Marie Halleux\textsuperscript{2}, John Henneberry\textsuperscript{1}, Hannah Hickman\textsuperscript{3}, Nick Taylor Buck\textsuperscript{1} & Aidan While\textsuperscript{1}

\textsuperscript{1}The University of Sheffield \quad \textsuperscript{2}Université de Liège \quad \textsuperscript{3}Hannah Hickman Consulting
# Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONTENTS</td>
<td>3</td>
</tr>
<tr>
<td>TABLES</td>
<td>4</td>
</tr>
<tr>
<td>FIGURES</td>
<td>5</td>
</tr>
<tr>
<td>GLOSSARY</td>
<td>6</td>
</tr>
<tr>
<td>SUMMARY</td>
<td>7</td>
</tr>
<tr>
<td>1. INTRODUCTION</td>
<td>9</td>
</tr>
<tr>
<td>2. PHASE I OVERVIEW</td>
<td>10</td>
</tr>
<tr>
<td>A. The research aim, context and definition of soft densification</td>
<td>10</td>
</tr>
<tr>
<td>B. The main influences on and effects of (different types of) soft densification</td>
<td>11</td>
</tr>
<tr>
<td>C. Empirical contribution to densification</td>
<td>12</td>
</tr>
<tr>
<td>D. Policy implications</td>
<td>12</td>
</tr>
<tr>
<td>3. RESEARCH METHODS</td>
<td>14</td>
</tr>
<tr>
<td>A. Case study selection</td>
<td>14</td>
</tr>
<tr>
<td>B. Methods</td>
<td>14</td>
</tr>
<tr>
<td>4. CASE STUDY ONE: THE LONDON BOROUGH OF EALING</td>
<td>15</td>
</tr>
<tr>
<td>A. An overview of key trends and planning history of Ealing influencing the housing market and soft-densification</td>
<td>15</td>
</tr>
<tr>
<td>B. Overview of soft densification and de-conversion in Ealing 2001-2011</td>
<td>21</td>
</tr>
<tr>
<td>C. Current planning and densification policy environment</td>
<td>24</td>
</tr>
<tr>
<td>Subterranean development</td>
<td>31</td>
</tr>
<tr>
<td>D. Case study examples</td>
<td>31</td>
</tr>
<tr>
<td>E. Core issues pertaining to soft densification in Ealing</td>
<td>44</td>
</tr>
<tr>
<td>F. Summary</td>
<td>61</td>
</tr>
<tr>
<td>5. CASE STUDY TWO: BRISTOL</td>
<td>64</td>
</tr>
<tr>
<td>A. An overview and the political context</td>
<td>64</td>
</tr>
<tr>
<td>B. Overview of soft densification and de-conversion in Bristol 2001-2011</td>
<td>69</td>
</tr>
<tr>
<td>C. Current planning and densification policy environment</td>
<td>74</td>
</tr>
<tr>
<td>D. Case study examples</td>
<td>80</td>
</tr>
<tr>
<td>E. Core issues pertaining to soft densification</td>
<td>95</td>
</tr>
<tr>
<td>F. Summary</td>
<td>110</td>
</tr>
<tr>
<td>6. CONCLUSIONS AND RECOMMENDATIONS</td>
<td>112</td>
</tr>
<tr>
<td>7. REFERENCES</td>
<td>117</td>
</tr>
<tr>
<td>8. APPENDICES</td>
<td>119</td>
</tr>
</tbody>
</table>
Tables

TABLE 1: PROJECTED PROPORTIONS OF ETHNIC GROUPS IN EALING, 2011-2031..........................20

TABLE 2: EALING SPECIFIC HOUSING TARGETS FROM THE LONDON STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT.................................................................27

TABLE 3: EALING SPECIFIC SMALL SITE CALCULATIONS FROM THE LONDON STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT .................................................................................................................................27

TABLE 4: EALING TYPE 4 – DEMOLITION AND NEW BUILDING .................................................................................................32

TABLE 5: EALING TYPE 6: CHANGE OF USE – DWELLING AND OUTBUILDINGS TO HOSTEL ACCOMMODATION .................................................................................................................................34

TABLE 6: EALING TYPE 5: IN-FILL DEVELOPMENT .................................................................................................................................36

TABLE 7: EALING TYPE 5: INFILL DEVELOPMENT (REJECTED) ....................................................................................................................38

TABLE 8: EALING TYPE: DE-DENSIFICATION ................................................................................................................................................38

TABLE 9: EALING TYPE: HARD DENSIFICATION ...........................................................................................................................................40

TABLE 10. TOTAL HOUSING STOCK AND BY TENURE IN BRISTOL, 2001 AND 2011 .................................................................................67

TABLE 11: SOFT DENSIFICATION IN BRISTOL AND SIGNIFICANT TOWNS, 2001 TO 2011 .................................................................................................................................71

TABLE 12: SOFT DENSIFICATION IN THE CITY AND COUNTY OF BRISTOL AND SURROUNDING LOCAL AUTHORITY AREAS, 2001 TO 2011 .................................................................................................................................71

TABLE 13: BRISTOL TYPE 1 & TYPE 2: RESIDENTIAL SUB-DIVISION AND EXTENSION AND RE-CONFIGURATION OF EXISTING PROPERTIES .................................................................................................................................82

TABLE 13: BRISTOL TYPE 3: GARDEN IN-FILL, EXAMPLE A .................................................................................................................................84

TABLE 14: BRISTOL TYPE 3: GARDEN IN-FILL, EXAMPLE B .................................................................................................................................86

TABLE 15. BRISTOL TYPE 4 - DIVISION OF HOUSE PLOTS AND REPLACEMENT OF A LARGE DWELLING IN WITH A CUL-DE-SAC PROVIDING SMALLER HIGH-STATUS HOUSES .................................................................................................................................89

TABLE 16: BRISTOL TYPE 5: INFILL DEVELOPMENT ON VACANT OR UNDEVELOPED PLOTS .................................................................................................................................91

TABLE 17: BRISTOL TYPE 6: CHANGE OF USE, SUBDIVISION OF NON-RESIDENTIAL BUILDINGS FOR RESIDENTIAL PURPOSES .................................................................................................................................93
Figures

Fig 1A. A map of London boroughs, with Ealing highlighted in dark blue.................................................. 15
Fig 2. LB Ealing: Soft densification 2001-2011 Red tones: densification blue tones: de-conversion........... 22
Fig 3. LB Ealing: Soft densification 2001-2011 (300M moving average) Red tones: densification blue tones: de-conversion........................................... 23
Fig 4. The location of 24 Messaline Avenue........................................................................................................ 33
Fig 5. The Front of 24 Messaline Avenue........................................................................................................... 33
Fig 6. The Front of 1 Leaver Gardens................................................................................................................. 35
Fig 7. Site location..................................................................................................................................................... 35
Fig 8. The Front of 8 Selborne Gardens, garage visible on left side of photo..................................................... 37
Fig 9. The Front left of 8 Selborne Gardens......................................................................................................... 37
Fig 10. Location map for 8 Selborne Gardens................................................................................................. 37
Fig 11 & 12. Front of 14 Carlton Road, some signs of dilapidation (broken window)................................... 39
Fig 13. Opposite 14 Carlton Gardens: Recently redeveloped with security features............................................ 39
Fig 14. Aerial photo of 14 Carlton Gardens....................................................................................................... 39
Fig 15. Photo of 26 Mount Pleasant Road: The dwelling frontage and location plan....................................... 41
Fig 16. Aerial photo of 26 Mount Pleasant Road.............................................................................................. 41
Fig 17. Aerial photo of the Arcadia, Ealing Broadway application....................................................................... 43
Fig 18. An example of a single family dwelling converted into 5 flats.................................................................. 47
Fig 19. An example of 2 dwellings sub-divided into multiple flats, extensive off-street parking.......................... 48
Fig 20. Example of an extended and converted building..................................................................................... 51
Fig 21. An example of a conversion of a single occupancy family dwelling to four flats..................................... 55
Fig 22. An example of a dwelling with on-going basement conversion to increase the residential floor plate. ............................................................................................................................................... 58

Fig 23. An example of a conversion to multiple flats (left) and recent renovation culminating in a single family dwelling (right)........................................................................................................... 59
Fig 24. An example of ‘hard’ densification in Ealing............................................................................................ 60
Fig 25. Bristol local authority in dark blue and surrounding local authorities in England and Wales................. 64
Fig 26. Bristol local authority in dark blue and surrounding local authorities in England and Wales.............. 65
Fig 27. Dwelling age profile England and Bristol............................................................................................... 66
Fig 28. 2011 Black and minority ethnic population............................................................................................... 69
Fig 29. West of England: Soft densification 2001-2011......................................................................................... 72
Fig 30. West of England: Soft densification 2001-2011 (300M moving average)................................................ 73
Fig 31. Aerial photo of 28 Radnor Road............................................................................................................. 83
Fig 32 & 33. 28 Radnor Road, under development, existing 1 story side, extension removed............................ 83
Fig 34. Aerial photo of 1 Tyne Road..................................................................................................................... 85
Fig 35. 1 Tyne road under construction................................................................................................................ 85
Fig 36. 1 Tyne Road, construction....................................................................................................................... 85
Fig 37. 1 Tyne Road, Front..................................................................................................................................... 85
Fig 38. Aerial photo of Eldon Terrace.................................................................................................................. 87
Fig 39. Eldon Terrace........................................................................................................................................... 87
Fig 40. Rear gardens of Eldon Terrace ................................................................................................................ 87
Fig 41. Completed ‘rear’ garden schemes............................................................................................................... 88
Fig 42. Rear garages of Eldon Terrace.................................................................................................................. 88
Fig 43 & 44. Single dwelling scheme ‘sandwiched’ between two rear gardens (1&2/3)......................................... 88
Fig 45. A single dwelling scheme ‘sandwiched’ between two rear gardens (3/3)................................................... 88
Fig 46. Aerial photo of Beloe Road...................................................................................................................... 90
Fig 47. 14-16 Beloe Road (1/2) ............................................................................................................................. 90
Fig 48. 1 & 2 Beloe Mews (2/2)............................................................................................................................ 90
Fig 49. 3&4 Beloe Mews, Source: Hannah Hickman.......................................................................................... 90
Fig 50. Aerial photo of Morley Road.................................................................................................................... 92
Fig 51. “The Edge”, Morley Road......................................................................................................................... 92
Fig 52. Aerial photo of St Lukes Hall.................................................................................................................... 94
Fig 53. St Lukes Hall............................................................................................................................................. 94
Fig 54. Dwelling completions in Bristol since 2006............................................................................................. 96
Fig 55. Dwellings delivered on private residential garden land............................................................................ 97
Fig 56. Number of dwelling units lost through de-conversion............................................................................. 107
Fig 57 & Fig. 58 An example of conversion from office to residential................................................................. 108
Fig 59. An example of hard densification in Bristol: Wapping Wharf.................................................................. 109
## Glossary

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>CIL</td>
<td>Community Infrastructure Levy</td>
</tr>
<tr>
<td>LB</td>
<td>London Borough</td>
</tr>
<tr>
<td>LPA</td>
<td>Local Planning Authority</td>
</tr>
<tr>
<td>LUCS</td>
<td>Land Use Change Statistics</td>
</tr>
<tr>
<td>HD</td>
<td>Hard Densification</td>
</tr>
<tr>
<td>HMO</td>
<td>Houses in multiple occupation</td>
</tr>
<tr>
<td>NPPF</td>
<td>National Planning Policy Framework</td>
</tr>
<tr>
<td>OA</td>
<td>Output Area (lowest geographical level estimates from the national census)</td>
</tr>
<tr>
<td>ONS</td>
<td>Office of National Statistics</td>
</tr>
<tr>
<td>PAF</td>
<td>Postcode Address File</td>
</tr>
<tr>
<td>PPG</td>
<td>Planning Policy Guidance</td>
</tr>
<tr>
<td>RSL</td>
<td>Registered Social Landlord</td>
</tr>
<tr>
<td>S106</td>
<td>Section 106 planning obligation</td>
</tr>
<tr>
<td>SD</td>
<td>Soft Densification</td>
</tr>
<tr>
<td>SFRN</td>
<td>Single Family Residential Neighbourhood</td>
</tr>
<tr>
<td>SHLAA</td>
<td>Strategic Housing Land Availability Assessment</td>
</tr>
<tr>
<td>SHMA</td>
<td>Strategic Housing Market Assessment</td>
</tr>
<tr>
<td>SPD</td>
<td>Supplementary Planning Document</td>
</tr>
</tbody>
</table>
Summary

This report is the second phase of research into the English Experience of Soft Densification and builds upon the quantitative data analysis undertaken in phase I. Adopting an intensive qualitative case study approach two local authorities, the London Borough of Ealing and Bristol City Council, are considered in detail. Ealing represents a suburban area that experienced concurrently significant soft densification and de-conversion of existing stock in the period 2001 to 2011, whilst Bristol over the same period experienced a high level of housing growth.

In England, national level policy for land-use regulation sets the overarching framework for local planning. If anything planning policy in England has become increasingly centralised in recent years, particularly around issues of housing supply. This emphasis on increasing housing supply has reinforced the orientation of English planning policy towards urban containment and urban densification, including a tacit policy of ‘soft densification’. After 2010 the previous presumption in favour of soft intensification through ‘garden grabbing’ was abolished by the incoming Coalition government using a national redefinition of previously developed land. It is now expected that there will be an intensification of housing in urban areas and through new urban extensions and selective release of land in the green belt around cities.

Ealing

The residents of Ealing, with a long history of densification, recognize it as part of the life of the borough, and therefore soft densification is relatively uncontentious. Housing demand in Ealing is heavily influenced by the wider housing market and economic trends across London, which the local authority responds to rather than directs. Three factors combine in Ealing at the neighbourhood or street level to impact the location and type of soft densification: the existing housing form, access to transport and access to services. With extensive and detailed information about the housing market, and with the ability to create type and location specific housing plans, the local authority is well-positioned to recognise the pressures of soft densification. However, the outcomes of soft densification are less well known and the cumulative impact has had a greater impact on some neighbourhoods and residents than has been recognised or prepared for, leading to under resourced services and in some cases a detrimental impact on the aesthetics or character of a neighbourhood.

Bristol

Bristol Local Planning Authority is in favour of densification and has pursued it through local planning policy. Whilst hard densification is the main source of new development, soft densification plays an important role in many neighbourhoods in housing supply. As in Ealing, soft-densification is more likely where it is complementary to the existing urban fabric, and is in close proximity to public transport and other services. Pressures to soft densify are more prevalent in higher value neighbourhoods than lower value neighbourhoods, presenting policy challenges to provide greater housing numbers and support housing markets across the city. Soft densification is more contentious in Bristol than Ealing, with concern about the impact on service provision and the availability of on-street car parking.
Conclusions and recommendations
Soft densification is contingent upon the fine grain of urban contexts, leading to varied pressures and experiences in different locations. From the research undertaken in Ealing and Bristol it is evident that local authorities collect large amounts of information about the local housing market that are pertinent to planning for soft densification. The flexible local planning policy approach also enables authorities to provide contextualized approaches to encouraging and controlling soft densification. Despite this approach, there are concerns within the local planning authorities and amongst some residents that soft densification is not being adequately managed by appropriate policies. The main concerns raised about soft densification are:

• The visual impact on the residential character of areas (especially in Ealing);
• Pressure on local infrastructure and services (schools, roads, parking, open space);
• The loss of garden space;
• Diminished privacy and its effect on residential amenity.

Appropriate policies are therefore required to manage these negative externalities, these may include:

• Design and conservation frameworks to retain the visual character and heritage of residential areas;
• Assessment frameworks to ensure that development does not place undue strains on key aspects of infrastructure and is matched by appropriate investment in schools, childcare, roads and public transport and open space;
• Measures to retain an appropriate balance between development and open space.

In order to understand the potential impact of soft densification in a neighbourhood and to mitigate the negative aspects the following recommendations are made:

• The collection and maintenance of high quality data on housing market demand, land use and planning to enable informed policy planning about the appropriate locations and types of soft densification;
• The collection and maintenance of high quality data on soft densification to measure and analyse the cumulative impact of soft densification developments over time and across different spatial scales;
• The ability to create localised policies in relation to different forms of soft densification, whilst also constraining the negative cumulative impacts of loss of garden space, amenity and aesthetic values in a neighbourhood;
• To clearly layout the relationship between soft densification and general planning guidelines, for example how national or local space standards apply to different types of soft densification;
• To control the design and aesthetic impact on neighbourhoods of soft densification, with recognition of the cumulative impact of multiple developments;
• Financial provision, either through the planning process (e.g. obligations) or through other mechanisms, to provide the full level of resources required to support the impact of soft densification (for example on school places, doctor’s places, transport networks).
1. Introduction

The second phase of the research into the English Experience of Soft Densification is a quantitative and qualitative overview of the experience of soft densification (SD) in two Local Planning Authorities (LPA). The case studies were chosen to provide contrasting accounts of soft densification, they are the London Borough of Ealing and Bristol city. This report extends the quantitative analysis undertaken in Phase I to provide a detailed account of the types and variations in SD that occurred in the case study areas between 2001 and 2011. It also describes the results of site visits, policy analysis, document reviews and interviews with actors in each area. These are combined to present an account of the pressures, policies and outcomes of SD in Ealing and Bristol.

The selection of the two case studies was informed by the empirical overview of types of SD in Phase I and by a consideration of the LPAs’ key similarities with areas of potential SD in France. The London Borough of Ealing experienced contrasting pressures for development between 2001 and 2011, with densification and de-conversion both occurring. As a borough in the capital city, with high housing demand and pressure on space, Ealing offers a relevant comparison to areas in the Paris region that may experience pressures from SD. Circumstances in Bristol are different. It is the largest city in the South West of England and has experienced high levels of household growth. The LPA is dealing with market-driven pressure for SD that is likely to be similar to growing urban areas in France.

The structure of the report is as follows. First, an overview of the Phase I findings is presented. Next the research methods used in Phase II of the research are described. The two case studies are then considered in turn. Each case study explores relevant national, regional and local planning policies before providing examples of the types of SD that have occurred within the relevant authority. The drivers and outcomes of SD are analysed, drawing on the results of interviews and document analysis. Cross-cutting themes are explored. Finally, the overall conclusions and recommendations arising from Phase II are presented. The appendices include an overview of SD in local authorities that neighbour Bristol and maps of SD in LB Ealing and Bristol. The appendices provide additional material that may be of interest to the reader, but are not essential elements of the report.
2. Phase I Overview

a. The research aim, context and definition of soft densification

The aim of the first phase of the study of the *English Experience of Soft Densification* was to introduce the policy framework relevant to SD and to undertake a quantitative analysis of the trends of SD across England at a range of scales.

In England, there has been a long tradition of attempts to prevent urban sprawl, deeply rooted in popular politics. Since the 1947 Town and Country Planning Act, urban containment has been at the heart of British planning, whilst an emphasis on “concentrated dispersal” to New Towns was established under the 1946 New Towns Act, and later to the planned expansion of medium sized towns. By the 1980s, the objectives of Green Belt policy were expanded to encourage urban regeneration. From the 1990s, the traditional concern of British planners with urban containment became allied with a need to foster sustainable development (Planning Policy Guidance Note 3 (PPG3)), and a reinvigorated view of the compact city. In 1998 Government made a commitment that by 2008, 60% of new dwellings would be accommodated on previously developed land¹, and this was renewed through PPG3 in 2000. In short, densification in England has occurred within a policy context that supports urban containment and sustainable development. To discern the role of SD it was necessary to develop the definition outlined by PUCA. The following six forms of SD were identified:

- Internal subdivision of houses into flats.
- Extension and reconfiguration of large properties to provide new units.
- Construction of auxiliary dwellings – one (or occasionally more) new dwellings built on residential land without demolition of a dwelling unit (approximating units gained through residential plot subdivision and referred to as “garden infill”).
- Division of house plots – i.e. within villa-suburbs replacement of a very large dwelling in an extensive garden with a cul-de-sac providing smaller high-status houses (from the 1960s onwards), or (latterly on some such estates) by a low-rise high-status apartment block.
- Infill development on spare or undeveloped plots.
- Change of Use – i.e. construction on previously non-residential sites, and subdivision of non-residential buildings for residential purposes where radical change is not involved and where the development might reasonably be expected to be undertaken by the type of agent associated with SD.

Although conversion and subdivision activity forms an important part of SD, not all such activity belongs to the category of SD. Much conversion and subdivision (e.g. of former industrial premises such as textile mills) is at a scale entirely different from that of immediate concern and may be undertaken alongside large scale new construction to ensure viability. The work of specialist

¹ The definition of previously developed land, or brownfield land as it is also called, is discussed in section C.
developer Urban Splash provides good examples of large scale conversion and subdivision (Bloxham et al, 2011).

b. The main influences on and effects of (different types of) soft densification
The interplay of a wide number of factors influences the level and types of SD. The overall level of demand for housing, contingent upon potential household growth, interacts with the types of densification permissible and viable in a market economy to produce or prohibit SD. These policy and market variables are overlaid on specific settlement morphologies and on individual patterns of land ownership. In addition to morphological and ownership variation different developer behaviour adds a further layer of complexity. These influences combine to produce locational variation in SD.

The overall SD rate at any scale depends on counterpoised ‘push’ and ‘pull’ mechanisms: the tendency to convert houses into flats, and the tendency to deconvert flats and to amalgamate dwellings. These counter-mechanisms allow the portfolio of houses to be adjusted to variation in market demand – satisfying, for example, demand for larger dwellings by long-distance commuters.

Regarding the planning policy context, densification policies – in particular PPG3 – should be seen as the complement to long-established Green Belt policy. There has been very little significant physical expansion of urban areas in England in the last 20 years or longer. Densification of development has occurred both on the urban brownfield sites (previously developed land) favoured by policy and, less frequently, on urban green field sites (previously undeveloped land within cities). The constraints on housing supply arising from this containment policy have resulted in substantial upward pressure on house prices.

Where demand is sufficiently high, bid prices or bid rents might ensure the viability of radical densification projects. However, bid prices for larger units and larger plots might in some circumstances be sufficiently high to remove any incentive to densify. In principle, this might weaken any tendency to subdivide dwellings or plots, or might even encourage deconversion. It appears that negative SD rates are associated with particular high quality suburban or out-of-centre residential locales that prove attractive to households seeking more housing space and whose members are willing to commute longer distances.

Some local authorities (e.g. Blackburn) have found that houses in multiple occupation (HMOs) and sub-divided terraced houses have a seriously detrimental impact on the growth, regeneration, image, attitudes to investment (both inward and local) and sustainability of communities and neighbourhoods where they are concentrated. Infill SD in general has consequences by virtue of its location relative to existing dwellings (eg. pressure on infrastructure, additional traffic, loss of light, and intrusion). Garden infill, in particular, may have even greater local impact, given its additional consequences for biodiversity and neighbourhood character.

2 The character of a neighbourhood is the combined effect of public and private space and the built environment upon the public imagination. It is defined by the Shaping Neighbourhoods: Character and Context London Supplementary planning Guidance as: “the interplay of different elements, including the physical or built elements that make up the place, the cultural, social and economic factors which have combined to create identity, and the people associated with it through memories, association and activity.” (Mayor of London, 2014, P.4)
c. Empirical Contribution To Densification

Between 2001 and 2011, SD accounted for roughly one third (28.5%) of the net additional dwellings created in urban areas, or about one fifth (17.1%) of the entire increase in England's dwelling stock. Within single-family residential neighbourhoods (SFRNs), SD accounted for almost a third of all properties gained through densification (32.1%), though in some urban areas this falls to 16.3%. 37.8% of units attributable to SD were generated through internal reorganisation of buildings, including conversion and subdivision of buildings formerly in non-residential use. Within SFRNs, the majority of SD (62.2%) was generated through infill construction rather than from reorganization of existing buildings. Only a small part of this infill construction was accommodated on subdivided house plots – the majority were built on vacant plots or plots that had previously been in non-residential use. Only 10.5% of the total soft densification between 2001 and 2011 was garden infill.

The year-by-year breakdown also suggests that the flow of garden land coming forward for housing development is price sensitive. Although the proportion of new units accommodated through garden infill varied relatively little over the decade, it exceeded 10% as the economic boom neared its peak in 2007. Negative rates of SD were not characteristic of larger low-growth urban areas. The least affordable areas generally show negative rates of SD, whereas higher rates of plot subdivision typify high status neighbourhoods.

Using the Output Area classification for 2001 generated for the Office of National Statistics it is possible to consider the neighbourhood characteristics within which SD occurs. Using this classification, with the exception of the “Prospering Younger Families” group, all subgroups of “Prospering suburbs” show overall rates of SD below the average (1.9%), while members of the other supergroup distinguished by detached houses show rates above the average. Those towns displaying the greatest tendency to divide plots and create new dwellings through garden infill are, paradoxically, those where overall rates of SD are negative or very low. There was a clear tendency for development densities on a derived plot to be less than that typical of the ‘host’ OA. Those neighbourhoods that superficially seem physically most amenable to SD proved least likely to have been densified.

d. Policy Implications

The effects reported must be understood as depending upon strong, long-established green belt constraint, well-developed systems of planning regulation and the case by case decision making process for planning permission. The case by case nature of planning applications and decision making in England makes it difficult for LPAs to plan for or to understand the cumulative impact that soft densification has on neighbourhoods.

LPA monitoring of starts and completions, a fortiori, is expensive in terms of staff time. Monitoring outstanding planning permissions is particularly troublesome given the number of variant permissions that may have been granted on the same site. Generally, unlawful development apart, it is easier for LPAs to monitor additions to the dwelling stock (simply because all require planning permission) than to monitor adjustments that reduce the stock (such as amalgamation and deconversions).
It is inevitable that sources maintained by local authorities will under-record downward adjustments to the dwelling stock and hence over-estimate SD. The implication is that the brownfield infill component of SD can be high relative to household growth when the planning system can effectively divert development to such sites. This is possible with a planning framework that prohibits development of greenfield sites, to the extent that settlement morphology and land use structure imply a commensurate expected flow of land for redevelopment.
3. Research Methods

Phase II builds on the extensive national and local quantitative analysis undertaken in Phase I. It investigates the outcomes, impacts and processes of SD through fine-grained analysis, considering variation in the effects of SD between and within localities. This reflects the combination of distinctive local economic, social, land-use, regulatory and market variables. Such research allows us to examine the processes and outcomes of different forms of SD in different local contexts. It also allows us to examine the detailed relationship between regulation and outcomes, reflecting the hypothesis (following the Consultation, section A: 13) that densification processes can produce various, sometimes diametrically opposed, effects, depending on whether or not they incorporate a series of measures such as spatial planning that takes into account travel and public facilities, design control, or even the transformation by residents themselves of their living space.

a. Case study selection

The choice of local case studies was informed by the Phase I analysis and in consultation with PUCA’s commissioning team. Two case studies have been selected to examine two different examples of SD in terms of impacts and outcomes; different land-use (morphological), socio-economic, market and environmental contexts; the impact of different forms of land-use, building and design regulation on soft densification; and good practice in the delivery of affordable housing. The two case studies are the London Borough of Ealing and the city of Bristol. They offer contrasting examples of SD in the UK and reflect two different contexts for SD; those of a capital city suburb and of a major conurbation in the South of England. It is likely that other forms of SD are occurring in alternative contexts.

Investigation of the LB Ealing provides opportunities to examine circumstances where pressure for conversion and deconversion were equally balanced and where it is possible to explore plot subdivision. Bristol is an area that experienced a high rate of SD between 2001 and 2011 involving a high rate of infill and a high rate of subdivision of existing buildings. Bristol does not share the same balance of conversion and deconversion that was found in Ealing.

b. Methods

The local case study research includes and combines: (1) quantitative analysis of the extent of SD and socio-economic outcomes, including provision of affordable housing and the impact on overall affordability; (2) qualitative analysis of the role of regulation in shaping the outcomes and impacts of SD. The research also combines the study of patterns over broad areas with detailed analysis of particular sites of SD in relation to individual plots or neighbourhoods. Each case study contains a selection of site examples in which different forms of SD have occurred. Further quantitative analysis extends that undertaken as part of Phase I. The research team assessed perceptions of the recent impact of SD through structured observation techniques, document analysis and 20 interviews. Interviews were undertaken in each case study with urban planning officials, surveyors, estate agents, civic representatives and other individuals and organisations with an interest in SD.
4. Case Study One: The London Borough of Ealing

During October to December 2015, a case study analysis of SD was undertaken of the London Borough of Ealing. The geographical context of LB Ealing is shown in figure 1. Situated on the west side of London, it is close to both more expensive local authorities closer to the city centre, and the traditionally more spacious suburbs on the edge of the city.

Fig 1. A map of London boroughs, with Ealing highlighted in dark blue

![Map of London boroughs with Ealing highlighted](image)

a. An overview of key trends and planning history of Ealing influencing the housing market and soft-densification

The London Borough of Ealing, to the west of central London, had an estimated population of 342,494 in mid-2013 (Office of National Statistics, 2014). During the preceding 12 months it experienced natural population growth (3,814) and negative net in-migration (-2,021, calculation: -4,404 internal migrations plus 2,383 international migrations), resulting in an overall increase in population of 1,823 for the year\(^3\). Population growth in the geographical region now referred to as Ealing borough was very low until the end of the nineteenth century, the borough largely covered by agricultural land and small villages. The introduction of railways and improvements in bus transportation allowed residents improved access to London, but whilst maintaining proximity to countryside, self-referentially calling itself the ‘Queen of the suburbs’. Expansive housing development occurred throughout the twentieth century with increases in both private dwellings and after WWII an expansive public housing programme. During this period the borough became home to large-scale international in-migration, which has continued until the present.

\(^3\) The Office for National Statistics includes a third part of the calculation, ‘other’ which accounts for 30 people in Ealing.
The growth in population led to the creation of Ealing as a London borough in 1965, although neighbourhoods within Ealing maintained a level of individuality, with some specific characteristics. Some residents continue to view neighbourhoods such as Acton, Hanwell and Perivale as discrete urban entities or city-villages. This variation is reflected in both the geographic units of the local authority and in some cases in specific guidance on development. For example Northolt Village Green has been designated as one of the borough’s 29 Conservation Areas and therefore development must conform to tighter materials and design regulations

Ealing council is currently composed of 53 Labour councillors, 12 Conservative councillors and four Liberal Democrat councillors. As a LPA, Ealing Council is responsible for determining planning permissions within the area, in line with both national policies and London policies (see detailed section below on planning policies). The 29 places on the Planning Committee within the council, which is responsible for making planning decisions, currently include 20 Labour councillors, five Conservative, three Liberal Democrat and one vacancy.

Housing Stock
The 2011 Ealing Private Sector House Condition Survey highlighted that the age profile of Ealing’s 102,640 owner occupied and privately rented stock differed from national averages. The 1919 to 1944 age band was substantially over-represented at 46.8% compared with 17.0% nationally. It appears that some of this over-representation is due to Ealing having significantly higher proportions of terraced housing (39.8%) compared to the national average (28.6%). Flats are also over-represented compared to the national picture (36.5% vs 13.5). 15.1% of dwellings were converted flats, and 5.3% were Houses of Multiple Occupation (HMOs), which compares to a national average of 2%. Ealing has a lower proportion of long term vacant dwellings (0.6%) than the England average (approximately 1.5%).

Planning Committees and Planning Permission
A planning committee in England is the group of elected local authority councillors that meet to determine whether a planning application should be granted or not. The committee acts on behalf of the Local Planning Authority and is advised by officers employed by the authority. Officers will provide the councillors with a recommendation for each application, which should be based upon the authority’s and national government’s planning policies.

Planning Committees have eight weeks from the date of the planning application (13 in complex cases) to decide whether the application should be granted. Councillors in planning committees use their judgement to determine whether they agree that an application should be permitted, however it is the responsibility of the committee to make judgements in accordance with the policy of the council as outlined in the development plan, unless material considerations require an alternative (s38A Planning & compensation Act, 2004). It is normal for planning committees to grant officers delegated powers to act on non-contentious and/or smaller scale developments.

http://www.ealing.gov.uk/downloads/download/865/northolt_village_green_management_plan
Prior to granting planning permission the authority is statutorily obligated to listen to the views of the public (unless it is a permitted development, see box below). These views may either support or object to the application, but should only be considered by the planning committee if they relate to legal aspects of the development (material considerations in English planning terminology). Whilst the number of comments for or against the application should not influence the planning officer’s recommendation or the planning committee’s decision, there may be political reasons to recognize the public’s view and to respond accordingly. In these cases, if the views are not material considerations, the planning decision may be open to appeal.

Between 2001 and 2011, there was a 2% increase in unshared dwellings\(^5\) (2,779), and a 47% increase in shared dwellings\(^6\) (416) in Ealing. Comparatively, London (5%) and England (4%) showed greater increases in unshared dwellings, and much smaller increases of 26% and 1% respectively in shared dwellings over the same period. Much of Ealing’s increase in unshared dwellings originated from a 13% (4,579 unit) increase in purpose built blocks of flats, and a 27% (1,423 unit) increase in detached properties. However, much of this was offset by a 9% (3,330 unit) decrease in terraced properties. Over the same period, there was a 1% (155 unit) increase in flats within a converted or shared house. This runs counter to a 6% decrease in flats within a converted or shared house in London and England over the same period. Ealing’s 23% growth in Registered Social Landlord (RSL)\(^7\) stock was lower than all comparators, with London (39%) the South East (35%) and England (63%) all displaying greater increases. These figures should be assessed with caution, during the period 2001 to 2011 many local authorities transferred ownership of some of their stock to RSLs, therefore whilst there is a change in ownership from the local authority to an independent organization, they percentage increase in stock for RSLs between 2001 and 2011 overestimates the actual increase in social housing\(^8\). In 2011 Ealing council embarked on its first programme of building new social housing in almost 30 years. This was expected to result in 206 new units by the end of 2015.

Tenure
In 2011 the owner occupied stock represented 52% in Ealing compared with 68% nationally, while the private rented sector was higher at 28% compared with 14% nationally. This is due in part to a 15% (10,955) decrease in the number of owner occupied dwellings in Ealing between 2001 and

\(^5\) Unshared dwellings are properties that do not contain any spaces within the dwelling that are used by more than one household. Further details of the definition of unshared and shared dwellings may be found at: https://www.gov.uk/guidance/definitions-of-general-housing-terms

\(^6\) The definition of shared dwellings in the UK is a property with more than one room that may be accessed by more than one household.

\(^7\) Converted property is one that has had a change in its type. It may therefore refer to a range of types of change, for example the change from a single occupancy dwelling (unshared) to multiple flats for single occupancy (unshared), or for example a shared property that is altered to be used for one household only.

\(^8\) Registered Social Landlords, or Registered Providers as they are also known, provide housing at below market rent to some or all of its tenants, i.e. they provide social housing. RSLs are normally Housing Associations (private) or local authorities (public), although it is now possible for commercial organisations to be the landlord of social housing.

\(^9\) These figures are further complicated by an underestimate in the 2011 census nationally of the RSL housing stock as many respondents did not realize that ownership of their property had been transferred from the local authority to an RSL.
2011, which is a greater decline than that shown by London (8%) and England (1%) over the same period. In Ealing this loss can apparently be explained by the shift towards private rented dwellings over the same period, which increased by 74% (14,566). This increase is similar to London (75%) and lower than England (82%). Indeed, Ealing’s increase in private rented dwellings accounted for much of the 5% (6,059) total increase in dwellings between 2001 and 2011.

Overcrowding
The 2010 ONS Integrated Household Survey contained an estimate of overcrowding, which is defined as households with at least one bedroom too few for the occupants. At 9.4% Ealing’s level of overcrowding is higher than the London average (7.5%). According to the 2012 ‘State of Ealing Housing’ report, the social rented stock has the highest levels of overcrowding: 30.7% in the Housing Association\(^\text{10}\) (HA) rented stock and 27.9% in the local authority rented stock\(^\text{11}\).

Market Rental Levels
In the 12 months to Q1 2015, The Valuation Office Agency revealed that Ealing’s average rent of £1,383 was higher than Outer London (£1,308), the South East (£891), and the UK (£768). However, as would be expected, the higher Inner London average (£1,876) means that Ealing rental levels are below the London wide average (£1,599). In Q1 2015, Ealing had a median rent of £1,300, with a similar contextual relationship as described above. However, the median rents did not change in Ealing between Q1 2014 and Q1 2015, despite increasing by 0.84% in England, 3.87% in the South East, 3.85% in London as whole, 7.59% in Inner London, and 9.09% in Outer London. However, over the medium term between 2011 and 2015, median rents did increase by 30% in Ealing, a greater increase than London (26%), the South East (11%), or England (5%). Ealing’s rents therefore seem to have been growing faster than the comparators over the last few years, and are perhaps now experiencing a period of correction.

The 2013 Ealing Strategic Housing Market Assessment found that entry rental costs in the private rented sector vary by location within the Borough, but that 83% of new households forming\(^\text{12}\) cannot afford to rent in the private market.

Social Housing Rental Levels
In March 2002, social housing rents were approximately £266 per month (£66.47 per week) in Ealing, compared to £261 in London and £223 in England. Historically, social housing rents in Ealing rose 25% between 2001 and 2011, slightly lower than London’s (27%), and lower than the South East (37%) or England (42%).

\(^{10}\) Housing Associations are not-for-profit independent organizations with the purpose of providing low-cost social housing for people with housing need. They are the largest providers of social housing in England, but the organisations vary in size considerably.

\(^{11}\) Local authority stock is social housing provided by the local authority, and therefore publicly owned.

\(^{12}\) New households forming refers to the creation of a new household unit requiring a dwelling. The unit may comprise of any type of household, and therefore may refer to a single person who has left the parental home to move into single occupancy accommodation or it could refer to a couple who have both left their separate accommodation to create a new household. New household formation or new forming household are not the same as changes in household type through natural changes (e.g. births or deaths) or where there is no net additional housing need (for example a single person moving in to the dwelling that their partner lives in).
House Prices
In September 2015, the Land Registry reported that average house prices in Ealing were £472,089, representing a 7.1% annual increase from September 2014. This compares to £499,997 (9.6%) in Greater London, £256,737 (8.5%) in the South East, and £186,553 (5.3%) in England and Wales. It appears that the lower average house prices compared to Greater London are being suppressed by flat prices. For example, when comparing Ealing prices with Greater London as a whole, detached (£1,067,225 vs £881,708), semi-detached (£556,691 vs £512,790), and terraced houses (£478,000 vs £457,196) are all more expensive in Ealing. However, flats in Ealing cost £372,432 compared to £448,699 in Greater London as a whole. Between 2001 and 2015, average property prices have increased by 142% in Ealing. This compares to 144% in Greater London, 90% in the South East, and 95% in England & Wales. These increases are generally similar across all dwelling types, except for England & Wales, where flat prices increased more slowly (77%) than terraced (100%) and semi-detached (101%) over the same period.

The 2013 Ealing Strategic Housing Market Assessment found that on average a deposit of around £27,000 to £76,000 would be required to buy one and two bedroom flats and £48,000 to £100,000 for two and three bedroom terraced houses in the current Ealing market. Based on savings data, it is calculated that 72.6% of concealed households do not have a deposit for a one bedroom flat and without significant financial assistance from family will not be able to buy locally. Similarly, based on income data, 87% of new households forming households cannot afford to buy property locally in the lowest quartile of prices.

Demographic Data
ONS mid-2013 Population Estimates for Ealing are 342,494 (Male: 171,587 Female: 170,907), making Ealing the third largest of London’s 32 boroughs, after Barnet and Croydon. The GLA predict that Ealing’s population will rise to 367,700 in 2031 (an 11% increase over two decades), whereas the ONS predicts an even greater increase to 388,300 in 2031 (a 20% increase over the same period).

Between the 2012 and 2013 mid year population estimates, Ealing had a positive birth rate (births minus deaths) of 3,814, positive net International Migration (inflow minus outflow) of 2,383, positive ‘Other’ population change of 30, and negative net Internal Migration (inflow minus outflow) of -4,404. This resulted in a net population change of 1,823, between 2012 and 2013, which represents a net annual population increase of 0.54% – lower than London (1.30%), the South East (0.78%) or the UK (0.63%) over the same period.

Concealed households are theoretical constructs representing families or single people who currently reside with another household but who would move to another dwelling if they were able to. The term is not precisely defined, but is a measure of the number of potentially separate households if housing was available. It is a measure therefore of existing unsatisfied housing demand and need.

Office of National Statistics, the national statistical institute for the UK with responsibility for publishing statistics on the economy and population and for managing the national census.

Greater London Authority, a London-wide authority working under the guidance of the directly elected London Mayor, and scrutinized by the London Assembly. The GLA is a strategic regional authority with responsibility for a citywide housing strategy.
This is a much slower increase than the 5 year 2008-2013 trend which represented a net population increase of 9.74% in Ealing. This was on par with London (9.76%), but greater than the South East (5.07%) or the UK (4.41%) over the same period.

Over the medium to long term this growth was fed by a 33% increase in the birth rate and a 14% reduction in the death rate between 2002 and 2010. Between 2001 and 2013, the 0-15 age group increased by 20% from 59,700 to 71,600. In comparison, the same age group increased by 17% in London, and 3% nationally. Over the same period, the working age population (males aged 16-64, females aged 16-59) in Ealing rose by 8.8%, compared to 15.6% in London and 7.8% in England. The national trend towards an ageing population resulted in a 19.3% increase in the number of older people (males aged 65+, females aged 60+) between 2001 and 2013, which was slightly lower in Ealing at 12.7%.

Ethnically, the 2011 census revealed that Ealing’s population by place of birth was 67.4% European (approximately 51.8% UK), 7.4% African, 21.0% Middle East and Asia, 3.1% The Americas and the Caribbean, and 1.1% Antarctica and Oceania. According to the 2012 ‘State of Ealing Population’ report (amended March 2014), international in-migration to the borough has been consistently higher than that to London overall, and the proportion of non-white ethnic groups is set to rise (see Table 1).

The 2011 census also showed that Ealing had the second highest population density of the outer London boroughs, at 61 persons per hectare (pph). This compares to an average of 39.4 pph in Outer London, 101.2 pph in Inner London, 52 pph in London as a whole, and 4.1 pph in England.

**Table 1: Projected proportions of ethnic groups in Ealing, 2011-2031**

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2021</th>
<th>2031</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>53%</td>
<td>50%</td>
<td>48%</td>
</tr>
<tr>
<td>Black Caribbean</td>
<td>4%</td>
<td>4%</td>
<td>4%</td>
</tr>
<tr>
<td>Black African</td>
<td>4%</td>
<td>3%</td>
<td>3%</td>
</tr>
<tr>
<td>Black Other</td>
<td>2%</td>
<td>2%</td>
<td>3%</td>
</tr>
<tr>
<td>Indian</td>
<td>15%</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td>Pakistani</td>
<td>4%</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Bangladeshi</td>
<td>0%</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>Chinese</td>
<td>2%</td>
<td>2%</td>
<td>2%</td>
</tr>
<tr>
<td>Other Asian</td>
<td>6%</td>
<td>6%</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>10%</td>
<td>13%</td>
<td>14%</td>
</tr>
<tr>
<td>Total Population</td>
<td>330,200</td>
<td>355,400</td>
<td>367,700</td>
</tr>
</tbody>
</table>

Source: 2011 Census of Population, ONS

Analysis of the 2010 House Condition Survey & English Housing Survey 2008/2009 carried out in the 2011 Private Sector House Condition Survey highlighted that at 29.1%, Ealing had a greater proportion of couples with dependent child(ren) than the national average of 22.2%.
b. Overview of Soft Densification and De-conversion in Ealing 2001-2011

The LB Ealing was selected as the first case study because it provides an opportunity to examine circumstances where pressure for conversion and de-conversion are balanced and significant levels of both activities, including plot sub-division, have been experienced (see Figure 2 and Figure 3). Covert densification (“illegal outhouses”) has also occurred in Ealing.

The physical, socio-economic and housing market characteristics of areas within the Borough vary greatly. The local residential building stock exhibits a complex pattern of physical change. For example, significant levels of soft densification and deconversion are recorded adjacent to one another in both the south-west of the Borough – an area of relative deprivation, modest levels of housing transactions and low house prices – and in the south-centre of the Borough – a more affluent area with high levels of housing transactions and higher house prices. This suggests that quite different drivers of soft densification and de-conversion are at play in different parts of Ealing.
Fig. 2. LB Ealing: Soft Densification 2001-2011

Red tones: densification Blue tones: de-conversion
Fig. 3 LB Ealing: Soft Densification 2001-2011 (300m moving average)

Red tones: densification  Blue tones: de-conversion
c. Current planning and densification policy environment

The 1947 Town and Country Planning Act placed urban containment at the heart of British planning, with its emphasis on “concentrated dispersal” to New Towns, and the expansion of medium sized towns to prevent urban sprawl. By the 1980s, the remit of such ‘Green Belt’ policies had expanded to foster urban regeneration within the core cities. A further shift occurred in the 1990s, when the concept of urban containment became allied with the attainment of sustainable development – the ‘compact city’ principle. Specifically 1992’s Planning Policy Guidance Note 3 (PPG3) attempted to encourage a greater proportion of housebuilding on previously developed (‘brownfield’) land and within existing urban areas. After it became apparent that almost half of new housing development was already accommodated on brownfield sites, Government committed in 1998 to ensure that by 2008, 60% of new dwellings would be accommodated on brownfield land.

This commitment was renewed in 2000 with the revision of PPG3. Indeed, between 2000 and 2010 central Government used the proportion of new dwellings accommodated on brownfield sites as a key performance indicator for assessing LPAs. At the same time, central government policy guidance introduced minimum density thresholds for the first time. Sites developed at less than 30 dwellings per hectare (dph) were considered an inefficient use of housing land, and higher densities were encouraged.

Throughout this period, the principal popular concern was still in preventing urban sprawl, although the particular ways in which urban areas might be densified received far less attention. In contrast to PUCA’s concern with the impact of densification on pre-existing urban form, England’s drive to increase urban development densities was often pursued in the absence of any appreciation of the effects of such densification. Although guidance exists on how to assess the capacity of urban areas to accommodate densification (URBED, 1999), there has been very little quantitative analysis of precisely how densification has been achieved or its implications.

Additionally, and somewhat perversely, efforts to reduce urban sprawl were not measured according to whether new development was concentrated within existing urban areas, but rather whether new development occurred on previously developed land. This led to the preferential development of former airfields, other military sites and former hospitals far removed from existing urban areas.

A further element of the favourable view of new dwellings being located on previously developed land (or ‘brownfield’) was that residential gardens were considered as part of the parcel of land on which development occurred. Building up to the election in 2010 this form of development became increasingly important politically. Whilst there is limited evidence that garden infill development made a sizeable contribution to residential development, the Coalition government redefined brownfield sites to exclude residential gardens in 2010, to make this form of development more difficult. The issue of garden infill is considered in more detail in the conclusion of this report.
National Policy - National Planning Policy Framework (NPPF)
At the national policy level, the NPPF set out the Government’s planning policies for England and how these should be applied. It enshrines a presumption in favour of ‘sustainable development’, and has 12 core planning principles at its heart. One of these has particular relevance here in that it states that planning should:

‘support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change; encourage the reuse of existing resources, including conversion of existing buildings; and encourage the use of renewable resources (for example, by the development of renewable energy)’ (DCLG, 2012, point 17) [emphasis added in italics]

Clearly the second of these stipulations could be interpreted as encouragement for SD.

The NPPF also states that in order to significantly boost the supply of housing, LPAs should set their own approach to housing density that reflects local circumstances. However LPAs are encouraged to avoid being unnecessarily prescriptive in density terms, and to concentrate instead on the relationship of proposed development to neighbouring buildings and the local area more generally in terms of scale, massing, height, landscape, layout, materials, and access.

The NPPF specifically excludes residential gardens from any calculation of ‘windfall’ sites contributing to strategic housing land supply, and LPAs are encouraged to consider policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. In addition, the definition of ‘previously developed land’, which is favoured for development, specifically excludes land in built-up areas such as private residential gardens, parks, recreation grounds and allotments. This definition of ‘previously developed land’ highlights the alteration to the position prior to 2010 that residential gardens are included in the definition of brownfield development and therefore makes garden infill developments more difficult to justify.

Further notes on the changes in the definition of previously developed land and garden infill may be found in the conclusion.

The London Plan 2015
At the regional level the London Plan is intended to guide strategic planning across all London boroughs. It aims to set out an ‘integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years’. Overall, although there is much discussion of density in general, there is very little within the London Plan that is of direct relevance to SD. It should be noted however that the London Plan’s definition of ‘net additional homes’, which is used to set housing targets, includes additional dwellings provided by development and redevelopment, including the ‘conversion of residential and non-residential property, long term vacant

---

16 The National Planning Policy Framework was published on 27th March 2012 and applies the Government’s planning policies in England. A review of planning policy was instigated in December 2010 and a consultation draft of the NPPF was produced in 2011. The NPPF significantly reduced the volume of planning documentation (from circa 1300 pages to 65).

17 http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/ Section 17: Core Planning Principles

18 Windfall sites refer to development sites that are not identified in forward planning documents, for example the Strategic Housing Land Availability Assessment. They are not therefore considered in strategic planning, but are judged on an ad hoc basis by local planning authorities as they arise.
properties brought back into use and household spaces in non-self-contained accommodation’ (Mayor of London, 2015, P.109). This would again seem to offer support to the notion of SD.

The London Plan states that a rigorous appreciation of housing density is crucial to realise fully the potential of sites. A general density matrix is included which can be used to guide assessments of the appropriate density for an area, with variations for suburban, urban and central areas. Indeed, a stated key performance indicator for optimising the density of residential development is that over 95% of development should comply with this density matrix. However, the document is at pains to emphasise that the density guidelines should not be applied mechanistically, and should supplement an appraisal of local context, design, transport capacity, social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6).

Ealing benefits from a London-wide approach to these requirements in the form of London’s Strategic Housing Market Assessment (SHMA, see the box below) and Strategic Housing Land Availability Assessment (SHLAA). The London SHMA indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year. The 2013 London SHLAA found that London has the capacity, under current policy conditions, to provide a minimum of 420,000 homes between 2015/16 and 2024/25, or an average of 42,000 homes a year. Since 2004 the average annual delivery in London has been circa 25,000 homes suggesting average delivery needs to increase by 68%. Tables 3 and 4 below show that within the London SHLAA Ealing was thought to have the capacity to provide 1,297 homes a year between 2015 and 2025, with around a third of these (301) being provided on small sites.

### Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment

The NPPF requires LPAs to undertake a Strategic Housing Market Assessment (SHMA) prior to defining the Local Plan. The SHMA provides analysis of the number of market and affordable dwellings required across the housing market area. Some SHMAs cover multiple LPAs where the housing market area is considered to cross the geographic boundaries of the LPA. The SHMA provides an evidence basis for planning to encourage development in particular locations.

---

19 Non-self contained household spaces are bedroom spaces that are within the same physical building as another household space, but share the same door. The technical description below may be found here: [https://www.gov.uk/guidance/definitions-of-general-housing-terms](https://www.gov.uk/guidance/definitions-of-general-housing-terms)

“In recent years (since 2001) a dwelling is defined (in line with the 2001 Census definition) as a self-contained unit of accommodation. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household’s accommodation are behind a single door which only that household can use. Non-self contained household spaces at the same address should be counted together as a single dwelling. Therefore a dwelling can consist of one self-contained household space or two or more non-self-contained household spaces at the same address.”


21 Small Sites are not technically defined in national planning policy, and are not a well-defined construct within the planning literature. Their purpose of identifying small sites in some local authorities often relates to the level of affordable housing or Community Infrastructure Levy applied to the development. The Local Authority is responsible for deciding the number of dwellings permitted in one development application without requiring a levy, i.e. small site developments are unlikely to be required to pay the levy.
It is a statutory obligation under the NPPF for local authorities to identify and keep up to date a land supply for the following five years. The Strategic Housing Land Availability Assessment (SHLAA) is the technical assessment by LPAs to analyse the amount of land that could be made available for development. It identifies specific sites that might be developed, but does not suggest that they should be given planning permission. Applications for planning permission are required.

**Table 2: Ealing specific housing targets from the London Strategic Housing Land Availability Assessment**

<table>
<thead>
<tr>
<th>Large Site Capacity</th>
<th>Small Site Capacity</th>
<th>Capacity from long term vacants returning to use</th>
<th>Student non self-contained accommodation pipeline (rooms)</th>
<th>Total 2015-2025</th>
<th>Yearly Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>8,976</td>
<td>3,014</td>
<td>0</td>
<td>982</td>
<td>12,972</td>
<td>1,297</td>
</tr>
</tbody>
</table>

**Table 3: Ealing specific small site calculations from the London Strategic Housing Land Availability Assessment**

<table>
<thead>
<tr>
<th>Change of use net additions</th>
<th>New build net additions</th>
<th>Conversions net additions</th>
<th>Total 2004/05-2011/12</th>
<th>2004/5-2011/12 less garden land reduction</th>
<th>Total 2015-2025</th>
<th>Yearly Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>463</td>
<td>1,302</td>
<td>828</td>
<td>2,593</td>
<td>2,411</td>
<td>3,014</td>
<td>301</td>
</tr>
</tbody>
</table>

**London Housing Supplementary Planning Guidance (SPG)**
Supplementary Planning Guidance and Supplementary Planning Documents (SPG’s and SPDs respectively, see below) are written by LPAs to add specific guidance to the Local Plan on a particular topic, theme or site. Unlike the Local Plan there is no statutory obligation for LPAs to produce SPDs. Within the national guidelines for creating Local Plans, SPDs are permitted where they “support successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development” (p.153, Local Plan guidance).

**Local Plan**
The Local Plan is the core strategic document created by the LPA to define the core aspects of future development within the area and in line with the National Planning Policy Framework. They are a vision setting document, which must be ‘realistic’ and address the housing, economic, community and infrastructure needs. The plan should outline what will happen, where and when it will happen and how it will happen, which in reference to housing requires a prediction of the amount, location and timescale of new development.

The London Housing SPG sits under the London Plan, and contains more detailed discussion of density considerations. The general tone of the document is that density is less a consideration in its own right, and more an outcome of the implementation of policies to secure a better quality

---

environment (such as: streetscapes; massing; design; dwelling mix; adequate social, environmental and physical infrastructure; other local amenities; reasonably sized homes; adequate private open space) and the interplay of this with development viability. A useful quote helps to underline this point:

“residential density policy is about everything and nothing. On the one hand it informs everything to do with housing design and management. On the other hand, the actual density calculation of an acceptable development (in terms of units or habitable rooms per hectare) is a product of all the relevant design and management factors; if they are all met, the resultant figure is what it is and is arguably irrelevant. Anyone grappling with the thorny issue of density tends to go round in circles – moving between these two extreme positions”

(Maccreanor Lavington Architects, Emily Greeves Architects and Graham Harrington Planning Advice; 2012)

It is this stance that has led to the change in language from ‘maximising’ housing potential to ‘optimising’ housing potential. The reasons for this shift are that some developments:

- have not adequately respected local context
- have not adequately reflected other policy objectives (in terms of dwelling mix, for example)
- have densities above the relevant guidelines without considering fully the implications for wider policy objectives

Despite this move away from density as a goal in and of itself, it is still a material consideration:

“exceptions to the (density) ranges should be just that, whether above or below the appropriate range, and must be justified robustly”


Such justification could include demonstrating that infrastructure and amenity space requirements arising from development of a small site can be met outside the site, in which case there is encouragement to consider developing at the higher end of the appropriate density range. All new housing is required by the London Housing SPG to provide a minimum of 5 sq. m. of private outdoor space for 1-2 bedroom units and an extra 1 sq. m. for each additional occupant (Housing SPG Standard 4.10.1). This is a minimum standard and is required of all residential development. Typically this will be supplemented by additional space, which can take the form of either additional garden space (private or communal), and/or public open space (incorporating child play space, allotments or space for active recreation). However, the SPG does state that in certain circumstances it may be appropriate and preferable to secure a financial contribution in place of space provision. The SPG references the London Plan’s assertion that private garden land is an important component of what the London Plan terms ‘physical context’ and ‘local character’. Thus gardens are clearly seen as being very much part of the form, function and structure which warrants respect and coordinated and consistent strategic protection, where the existence of a threat can be evidenced locally.
Local Policy  

Ealing Development Management Development Plan Document (DPD)  
The Development Management DPD is part of Ealing’s broader Local Plan. Within the DPD, Policy 7B ‘Design Amenity’ again stresses the importance of high standards of amenity provision for users and adjacent uses of new development by ensuring:

- high quality architecture
- good levels of daylight and sunlight
- good levels of privacy
- coherent development of the site
- appropriate levels of development onsite
- positive visual impact
- legibility and accessibility

Of particular interest here is the requirement that extensions to existing development should ensure that the resulting development as a whole meets these design standards.

Ealing Core Strategy  
Ealing’s Core Strategy is a spatial vision that supports the overarching vision and goals for Ealing. It confirms that whilst proper regard shall be made to relevant London Plan policies which support higher densities in areas of good public transport accessibility, the density matrix should not be applied mechanistically and the council will, in particular, take into account primarily the quality of the design, the context of the site and the need to provide a suitable housing mix. It also stresses that, subject to public transport capacity, areas with high Public Transport Accessibility Levels (PTALs) can expect relatively high-density development.

Planning New Garden Space Supplementary Planning Document (SPD)  
The Planning New Garden Space SPD\(^ {23} \) sits under the Core Strategy, and highlights that pressure for new housing and other development can result in existing garden provision being threatened or compromised by inappropriate development. Such inappropriate development could take a number of forms, and Ealing includes extensions to existing properties encroaching onto existing garden areas, and the subdivision of existing gardens to accommodate new residential units (‘Garden Grabbing’). For example, when dealing with a proposal involving the loss of part of a garden it sets out a requirement to establish whether the resulting development brings the existing garden area below current quantitative garden space standards or undermines the quality of the original space. This would be contrary to the principles outlined in the above guidance, and policy 7B of the Development Management DPD. It will be necessary to demonstrate, for example, whether the original garden area remaining is still of functional value, and whether an appropriate level of privacy is retained. A proposal involving the reconfiguration of existing garden space resulting in a small, poorly shaped, overlooked and overshadowed garden serving the existing neighbouring unit(s) is unlikely to be acceptable. Similarly the contribution of existing gardens to the form, function and structure of areas requires careful consideration when judging proposals that alter the existing provision.

\(^{23}\) The Planning New Garden Space SPD may be found in the appendix of this report
Sustainable Transport for New Development SPD
The Sustainable Transport for New Development SPD, created in 2013, states that low car housing will be encouraged where there is evidence that car ownership and use will be low enough to justify the proposal. It is expected that this type of proposal will be appropriate in Controlled Parking Zones (CPZs) where there is a legal agreement preventing residents from having parking permits. This policy effectively encourages proposals for the conversion, extension and intensification of residential property on sites where there is not enough space for every dwelling to have a car parking space. This allows greater use of an urban site and promotes transport by modes other than the car. However, this type of development will only be encouraged where it will not generate problems such as increased parking stress in surrounding streets. The mechanism for preventing such problems where the development is in a CPZ is to require the developer to enter into a legal agreement preventing residents from having permits to park in the zone.

Ealing Strategic Housing Market Assessment (2013)
Ealing’s SHMA analysis results in much higher housing targets than the London wide SHLAA capacity figures outlined in Tables 1 and 2, with an overall annual need of 1,995 units per year between 2013 and 2026 – 25,935 in total. The Ealing SHMA recommends that an overall affordable housing target of 50% should be pursued, with 65% of this future affordable delivery being one and two bedroom units – slightly lower than current combined need levels of 69%. Developers are advised that future delivery in the market sector should consist of 60% units for single / couples and small family households and 40% for larger families. The larger families units should consist of 30% three and 10% four bedrooms to create a more balanced housing offer in the private market, whilst delivery of affordable housing for older people should also be prioritised.

Ealing Housing and Homelessness Strategy 2014 – 2019
This document sets out a number of key outcomes, including the provision of a minimum of 500 new council managed homes, and a minimum of 3000 new homes of all tenures. It also aims to meet the London Housing Strategy target of ensuring that no more than 1% of homes stand empty and unused for more than six months, and to bring 350 long-term empty dwellings into use through direct intervention.

Policy Summary
In summary, whilst there is very little direct reference to Soft Densification in the policy framework, it can be seen that the reuse, subdivision, and subterranean extension (basement development: see the box below) of buildings is not discouraged providing that the resulting development does not have a detrimental effect on local quality and character (particularly private garden space), and that the developer can demonstrate that the needs of residents can be met by existing physical and social infrastructures.

---

24 Low car housing refers to a policy to discourage the ownership and use of cars by residents in new developments in Ealing. Low-car housing developments prevent residents from obtaining permits to park on the road.
25 Parking on the road is restricted in many residential neighbourhoods. The restrictions take multiple forms; no parking at any time; parking permitted only during certain times; parking permitted only for residents (those with a permit); and parking permitted for a fee unless a resident. A parking permit therefore provides authorization for the holder to park on the road, but may be limited to particular hours.
Subterranean Development

The development of housing space underground has become increasingly popular in some areas within the UK. Areas with high levels of subterranean development are often in areas of high demand, with limited land availability.

The pressure on space may result from the limited availability of undeveloped land, and/or restrictions on development on the particular site. Historic buildings may have legal protection or may have cultural/aesthetic values for the owner, which preclude external alterations. In some locations there are restrictions on the height of buildings and external extensions, therefore developing underneath the dwelling enables an increase in the floor space.

Pressure to develop underground arises from a range of factors. Two significant factors are: to increase space for a single household and to enable the subdivision of a dwelling.

d. Case study examples

Ealing is a London Borough with decades of experience of densification. Current trends of densification are evident through the ongoing signs of development, whether through the large-scale redevelopment of Dickens Yard (see below) to provide housing for commuters using the new CrossRail station or the basement conversions of single and multiple occupancy dwellings.

In order to provide an overview of the types of densification occurring in Ealing, a sample selection has been extracted from the planning application database held by the LPA. Examples have been selected to represent particular trends and to highlight contemporary applications, decisions and developments. They remain, however, illustrative rather than representative of all densification in the borough.

The examples below draw on the typology of densification created in Phase I, and therefore cover:

- Sub-division of existing single family occupancy dwellings into multiple dwellings
- Change of use of buildings to residential
- In-fill development
- De-densification
- Hard densification
### Table 4: Ealing Type 4 – Demolition and New Building

<table>
<thead>
<tr>
<th>Address</th>
<th>24 Messaline Avenue, London, W3 6JX</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinates</td>
<td>51.514924, -0.265487</td>
</tr>
<tr>
<td>Ward</td>
<td>Acton Central</td>
</tr>
<tr>
<td>Developer</td>
<td>Newell Projects Ltd</td>
</tr>
<tr>
<td>Application</td>
<td>Construction of three storey building, with basement, to contain 8 self-contained flats (2x3 bed and 6x2 bed), consisting of two lightwells on front elevation, two off-street car parking and bin stores within front building set back, amenity space and cycle stores to the rear, Juliet balconies on rear elevation at first and second levels, one rooflight on north and south side roof slopes, new 600mm high front boundary wall, and associated landscaping and site works (following demolition of existing building)</td>
</tr>
<tr>
<td>Application submitted</td>
<td>24/12/2014</td>
</tr>
<tr>
<td>Site Description</td>
<td>A mid street two-storey detached property, with attached garage on a relatively quiet street. The dwelling sits parallel to the road, with garden areas to the front and rear.</td>
</tr>
<tr>
<td>Planning Summary</td>
<td></td>
</tr>
<tr>
<td>Approval date</td>
<td>11/11/2015</td>
</tr>
<tr>
<td>Relevant interviewee comments on the scheme</td>
<td>Ealing council gave permission for the development, as it is in keeping with the surrounding environment and met space standards and planning guidance. Concern was expressed about the below-ground accommodation, with lightwells the only major source of light and hence a concern about the quality of the space. However, planning permission was not withheld for this reason.</td>
</tr>
<tr>
<td>Other relevant information</td>
<td>The dwelling was listed for sale on 30th August 2013, with a listing price of offers over £999,950.</td>
</tr>
<tr>
<td>Site observations</td>
<td>The current building is a single dwelling, which is of lower height than properties on either side and does not extend to the same depth as neighbouring properties. Whilst it would be possible to sub-divide the current dwelling, it would not accommodate eight self-contained flats without extensive alteration. The plans, now with permission, are to demolish the existing building and replace it with a larger building with a larger footprint (although in keeping with neighbouring properties), greater height and greater depth, hence increasing the total floorspace.</td>
</tr>
</tbody>
</table>
Fig 4. The location of 24 Messaline Avenue

Photo: Richard Dunning

Fig. 5: The front of 24 Messaline Avenue
### Table 5: Ealing Type 6: Change of use – dwelling and outbuildings to hostel

<table>
<thead>
<tr>
<th>Address</th>
<th>1 Leaver Gardens, Greenford, UB6 8EN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinates</td>
<td>51.534130, -0.337394</td>
</tr>
<tr>
<td>Ward</td>
<td>Perivale</td>
</tr>
<tr>
<td>Developer</td>
<td>Mr Ahmed Al-Rashdi</td>
</tr>
<tr>
<td>Application</td>
<td>Change of use of single family dwelling house to house in multiple occupation (H170) comprising of twelve bedrooms, six bathrooms and four kitchen facilities, and four additional bedrooms with en-suite facilities in the outbuilding (use class Sui Genris)</td>
</tr>
<tr>
<td>Application submitted</td>
<td>02/11/2015</td>
</tr>
<tr>
<td>Site Description</td>
<td>The site is situated at the end of a row of semi detached properties and is bounded on the opposite side by railway property. At 0.065ha the site includes an area of hard standing to the front, a previously extended semi detached property with outhousing and sizeable garden to the rear.</td>
</tr>
<tr>
<td>Planning Summary</td>
<td></td>
</tr>
<tr>
<td>Approval date</td>
<td>(statutory determination date 07/01/2016)</td>
</tr>
<tr>
<td>Relevant interviewee</td>
<td>The council were unable to comment on this application currently.</td>
</tr>
<tr>
<td>comments on the scheme</td>
<td></td>
</tr>
<tr>
<td>Other relevant</td>
<td>A studio flat was listed for rent in January 2014 at a rent of £693 per calendar month</td>
</tr>
<tr>
<td>information</td>
<td></td>
</tr>
<tr>
<td>Site observations</td>
<td>As shown in figure X, the location is close to both a railway line and major road with three lanes in each direction. The dwelling has been previously adapted (2014) to include a flat roof. The application includes a covered walkway between the outbuilding and dwelling, but does not increase the footprint of the building, nor does it require changes to the hard standing area to the front of the property or the garden to the rear. The change of use, if granted, would not change the external appearance of the built environment, but would increase the intensity of use of the site. The house is situated in a relatively deprived neighbourhood.</td>
</tr>
</tbody>
</table>

---

26 A hostel is a form of low-cost shared accommodation, often with some catering provided. Rooms, or beds in shared rooms, are often rented per night and therefore users have no tenancy rights.
Fig. 6. The front of 1 Leaver Gardens

Photo: Richard Dunning

Fig. 7. Site location
**Table 6: Ealing Type 5: In-fill Development**

<table>
<thead>
<tr>
<th><strong>Address</strong></th>
<th>8 Selborne Gardens, Perivale, UB6 7PD</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Coordinates</strong></td>
<td>51.538161, -0.325245</td>
</tr>
<tr>
<td><strong>Ward</strong></td>
<td>Perivale</td>
</tr>
<tr>
<td><strong>Developer</strong></td>
<td>Mr Abdulla Ramadani</td>
</tr>
<tr>
<td><strong>Application</strong></td>
<td>Demolition of existing single storey garage and</td>
</tr>
<tr>
<td></td>
<td>construction of a two storey, two bedroom, end of</td>
</tr>
<tr>
<td></td>
<td>terrace dwelling house and associated landscaping</td>
</tr>
<tr>
<td><strong>Application submitted</strong></td>
<td>12/11/15</td>
</tr>
<tr>
<td><strong>Site Description</strong></td>
<td>The triangular site is approximately 160 sq m</td>
</tr>
<tr>
<td></td>
<td>and is within the curtilage of a 1930's semi-</td>
</tr>
<tr>
<td></td>
<td>detached dwelling. It comprises of hard standing</td>
</tr>
<tr>
<td></td>
<td>and prefabricated concrete garage. There are</td>
</tr>
<tr>
<td></td>
<td>similar extensions on neighbouring roads.</td>
</tr>
<tr>
<td><strong>Planning Summary</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Approval date</strong></td>
<td>(statutory determination date 07/01/2016)</td>
</tr>
<tr>
<td><strong>Other relevant information</strong></td>
<td>A withdrawn planning application was</td>
</tr>
<tr>
<td></td>
<td>submitted for the same plot of land to build a</td>
</tr>
<tr>
<td></td>
<td>detached bungalow in May 2015 by the same developer.</td>
</tr>
<tr>
<td><strong>Site observations</strong></td>
<td>Low-rise suburban houses, four linked properties</td>
</tr>
<tr>
<td></td>
<td>as short terraces. The prefabricated garage is</td>
</tr>
<tr>
<td></td>
<td>situated on the corner of two quiet roads with</td>
</tr>
<tr>
<td></td>
<td>extensive on and off street parking. The property</td>
</tr>
<tr>
<td></td>
<td>opposite, on a similar corner plot, has undertaken</td>
</tr>
<tr>
<td></td>
<td>a similar extension to the proposal.</td>
</tr>
</tbody>
</table>
Fig. 8. The front of 8 Selborne Gardens, garage visible on left side of photo

Fig. 9. The front left of 8 Selborne Gardens

Fig. 10. Location map for 8 Selborne Gardens
**Table 7: Ealing Type 5: Infill Development (rejected)**

<table>
<thead>
<tr>
<th>Address</th>
<th>14 Carlton Road Ealing W5 2AW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinates</td>
<td>51.515584, -0.312669</td>
</tr>
<tr>
<td>Ward</td>
<td>Ealing Broadway</td>
</tr>
<tr>
<td>Developer</td>
<td>Trecora Ltd C/O Savills, London</td>
</tr>
<tr>
<td>Application</td>
<td>The application seeks approval to construct a two-storey two-bedroom detached dwelling. The proposed dwelling would be located on the east side of the main building on the site and sited in place of the existing single storey garage, which is to be removed.</td>
</tr>
<tr>
<td>Application submitted</td>
<td>12/08/2015</td>
</tr>
<tr>
<td>Site Description</td>
<td>The site is located on the south side of Carlton Road, approximately 130m east of its intersection with St. Leonard’s Road. The site extends to an area of some 1,234sq.m and consists of a large red brick clad two-storey Victorian house consisting of bedsit units (HMO), a single storey double garage on the eastern side used for storage, large landscaped garden to the rear and car parking to the front. The site is not a listed building nor is it in a conservation area.</td>
</tr>
<tr>
<td>Planning Summary</td>
<td>The application is rejected on design grounds and the proximity of the external walls to a neighbouring property. This is a repeat proposal (prior refusal), which has sought to match the design of the existing dwelling in the extension, but is rejected again on design and proximity grounds.</td>
</tr>
<tr>
<td>Decision date</td>
<td>07/10/2015</td>
</tr>
</tbody>
</table>
| Relevant interviewee comments on the scheme | Quote from letter to applicant: "The proposed dwelling, due to its location, scale and form, would represent an obtrusive and incongruous form of development, out of keeping with the general pattern of development in the area and harmful to the street scene and the character and appearance of the area. As such it is considered that the proposal fails to comply with the objectives of policies 7.4 and 7.6 of The London Plan (2015) and Ealing Local Policies 7.4 and 7B of the Adopted Development Management Plan DPD (2013)."
| Other relevant information | Studio flat was advertised at a rent of £645 per month in February 2014 |
| Site observations        | The surrounding properties show signs of mixed recent development activity. One neighbouring property is a dilapidated ex-nursing home, with extensive damage to windows and façade. The property directly opposite has undergone extensive renovation, with high-end security features (electronic gates, CCTV and gatehouse). |
Fig. 11 & 12. Front of 14 Carlton Road, some signs of dilapidation (broken window)

Source: Richard Dunning

Fig. 13. Opposite 14 Carlton Gardens: recently redeveloped with security features

Source Richard Dunning

Fig 14. Aerial photo of 14 Carlton Gardens
### Table 8: Ealing Type: De-densification

<table>
<thead>
<tr>
<th><strong>Address</strong></th>
<th>26 Mount Pleasant Road, Ealing, W5 1SQ</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Coordinates</strong></td>
<td>51.526486, -0.310096</td>
</tr>
<tr>
<td><strong>Ward</strong></td>
<td>Cleveland</td>
</tr>
<tr>
<td><strong>Developer</strong></td>
<td>Clarke Associates</td>
</tr>
<tr>
<td><strong>Application</strong></td>
<td>Conversion of two self-contained flats into a single family dwelling house</td>
</tr>
<tr>
<td><strong>Application submitted</strong></td>
<td>11/03/15</td>
</tr>
<tr>
<td><strong>Site Description</strong></td>
<td>The application site is located on the eastern side of Mount Pleasant Road and accommodates a two storey semi-detached property that has been divided into two self-contained flats. The surrounding environment comprises a mixture of flats and single dwelling family homes. The property is not located within a conservation area and the building is not listed.</td>
</tr>
<tr>
<td><strong>Objections lodged</strong></td>
<td>Two formal remarks were received by the local authority from the public: from a neighbouring property and current tenants of the ground floor flat. The neighbouring property sought clarification on whether or not the proposal would involve external alterations and the tenants wanted acknowledgement of their occupancy of the ground floor flat.</td>
</tr>
<tr>
<td><strong>Planning Summary</strong></td>
<td>There is no recorded planning history for the property. It had, however, been converted from a single dwelling house to two flats at some point.</td>
</tr>
<tr>
<td><strong>Decision date</strong></td>
<td>06/05/15</td>
</tr>
<tr>
<td><strong>Other relevant information</strong></td>
<td>A five bedroom dwelling on the same road sold in September 2015 for £1.5million.</td>
</tr>
<tr>
<td><strong>Site observations</strong></td>
<td>A large number of single prefabricated garages are situated along the road, many are in a poor state of repair. The area is typified by semi-detached properties, with signs of recent sales activity. No.26 is a two storey detached property, not in keeping with the semi-detached properties on the road.</td>
</tr>
</tbody>
</table>
Fig 15. Photo of 26 Mount Pleasant Road: the dwelling frontage and location plan

Source: Richard Dunning

Fig. 16. Aerial photo of 26 Mount Pleasant Road
### Table 9: Ealing Type: Hard Densification

<table>
<thead>
<tr>
<th>Address</th>
<th>9-42 Ealing Broadway, Ealing,</th>
</tr>
</thead>
<tbody>
<tr>
<td>Co-ordinates</td>
<td>51.510730, -0.321888</td>
</tr>
<tr>
<td>Ward</td>
<td>Ealing Broadway</td>
</tr>
<tr>
<td>Developer</td>
<td>Londonewcastle and BE Broadway BV</td>
</tr>
<tr>
<td>Application</td>
<td>Demolition of existing buildings (9-42 The Broadway and 1-4 Haven Place) within the ealing town centre conservation area and construction of 8 new buildings (ranging from 2 storeys to 18 storeys) to provide 191 residential units (Use Class C3), 6667sqm flexible retail floorspace (Use Class A1/A3), 784sqm flexible retail / leisure floorspace (Use Class A1/A3/D1/D2), 514sqm bar / nightclub (Use Class A4 / Sui Generis) with basement car parking, new publically accessible route, associated public realm and landscaping, residential vehicular access off The Broadway and primary servicing off Springbridge Road via existing servicing route for 1-8 The Broadway and associated works.</td>
</tr>
<tr>
<td>Application submitted</td>
<td>15/07/15</td>
</tr>
<tr>
<td>Site Description</td>
<td>The Site is 0.62 hectares and located within the Ealing Metropolitan Centre, opposite Ealing Broadway Station, within the London Borough of Ealing (LBE). It is bound to the north by the railway line, to the south by The Broadway, to the east by Station Broadway, and on its west side by the newly refurbished shopping centre at 1-8 The Broadway. The existing properties along 9-42 The Broadway vary considerably in age, style, scale and appearance. The existing land uses on the site are set out in the table below including four residential properties at 1-4 Haven Place.</td>
</tr>
<tr>
<td>Planning Summary</td>
<td>(Statutory determination date 06/11/2015)</td>
</tr>
<tr>
<td>Decision date</td>
<td></td>
</tr>
<tr>
<td>Other relevant information</td>
<td>The site is located within 2 conservation areas, and although no buildings are listed, some of them are identified with the conservation area appraisal and Ealing List of Buildings of Façade or Group Value.</td>
</tr>
<tr>
<td>Site observations</td>
<td>It is adjacent to one of the prime entrances to Ealing and in the centre of the retail district on Ealing Broadway, with good transport links.</td>
</tr>
</tbody>
</table>
Fig. 17. Aerial photo of the Arcadia, Ealing Broadway application
e. Core issues pertaining to soft densification in Ealing

This section builds on extended site visits to Ealing, secondary data analysis, document analysis and eight interviews with representatives of residents associations, surveyors, an ex-councillor, an estate agent and the local planning authority. The site visits included a visual review of the signs of densification and evidence of pressures on the urban fabric, including vehicular and pedestrian traffic, waste disposal and aesthetic coherence. The interviews focused on perceptions of the pressures leading to ‘soft densification’ and de-densification, the modes of densification and their consequences on community evolution and cohesion.

Overview of the types of densification occurring in Ealing

The statistical analysis undertaken as part of Phase I of the project, The English Experience of Densification, revealed that both ‘hard’ and ‘soft’ densification took place in the London Borough of Ealing between 2001 and 2011. The statistical analysis indicated that the process of de-densification also took place in Ealing over the same period. All interviewees confirmed these trends, with most able to think of specific examples of each form of densification. However, the trends are not constrained by the time period, and were considered as a single section of longer trends. Residents, planners and agents all argued that the processes of ‘hard’ and SD in the borough have been ongoing, though in waves, throughout the twentieth century. They are not therefore seen as a contemporary novelty. Rather, current densification is a continuation of historic trends and norms within the borough. The following quote describes the trends from the turn of the twentieth century:

“It would have been doctors, lawyers, naval officers living here. They would have had two servants, so you can see the middle rooms, and in some the attics where the servants would have been. Basically the children 20 years later, so the 1920’s, couldn’t afford to live alongside their parents, plus their parents weren’t selling, and they moved to the Art Deco housing, the 1920’s houses further West: Hanwell, Greenford and so forth. Then, with the advent of the war the Polish community moved in, because the Polish air force was here, and they couldn’t afford to buy the houses unless they sub-let them. So, really from the war onwards as the families got older the children said ‘Hey, I don’t want this big old house, I want a nice small one, and plus I can’t afford it.’ And so the area started to decline in the second generation and so the Polish community turned them into flats. So it wasn’t until the 1960’s and 1970’s until people started turning them back into houses again. Virtually everyone I talk to says that at one time their 5 bedroom semi-detached house was at one time bedsits or multiple flats, probably a communal kitchen, but all flats. They started turning them back into houses. And that trend was occurring until about a year ago, when process got so high that people said ‘Wait a minute, you know, can I afford to move?’ Stamp duty etc, and now we’re people saying ‘Hey, I can make more money by renting these out’. The rents are so high and the value of a 2 or 3 bed flat is so high that people are saying we can get more money from renting them out. So, we’ve gone full circle in 120 years.”

(Surveyor)

Specific cases of de-densification were considered observable throughout the twentieth century by interviewees, but could not be confirmed as a significant trend (either in scale or in the impact on
the council’s resources or the identity and character of the borough) in the same way that ‘hard’ and SD could be identified.

The Phase I data ended in 2011, but interviewees argued that ‘hard’, ‘soft’ and ‘de-’densification has continued to take place between 2011 and 2015 and were considered likely to be ongoing trends. It is evident from both the site visits and interviews that SD is both a historic and contemporary phenomenon in Ealing.

Types of soft-densification
Of the six types of SD identified in Phase I, there are different trends for each in Ealing, revealing different drivers and outcomes for SD.

Internal subdivision of houses into flats
There is visible evidence of single dwellings being sub-divided in almost every area of Ealing presently and historically. The awareness of interviewees that the sub-division of the existing dwelling stock was being undertaken across the borough and their citing of numerous local examples reflects something of the scale and breadth of soft densification as a trend. The suggestion that SD was most frequently occurring through the sub-division of existing properties rather than other forms of SD resonates with the statistical analysis of the 2001-11 period.

Extension and reconfiguration of large properties to provide new units
There is evidence from interviewees that extensions to existing buildings are common in Ealing. Much of this type of development is permitted development (see the box below) and may not require planning permission, for example small extensions to the rear of the property.

Permitted Development
Permitted development refers to the permission to develop granted by the national government (Parliament) for minor changes to dwellings without the requirement to apply for planning permission from the local authority. Legislation outlining the definition and processes of permitted development is the Town and Country Planning (General Permitted Development) (England) Order 2015.

Permitted development rights are restricted in buildings designated as historically or architecturally significant (listed building) or in areas with special restrictions (designated areas, such as conservation areas or national parks).

Construction of auxiliary dwellings – one (or occasionally more) new dwellings built on residential land without demolition of a dwelling unit
There is less visible evidence of garden infill (garden-grabbing) than other forms of soft-densification activity. This was supported by some interviewees:

“Garden grabbing has been one area where Ealing has been pretty successful in resisting. There have not been much garden grabbing, and where it has happened it has been pretty well publicised and heavily opposed, but that doesn’t mean to say it hasn’t happened at all….Garden-grabbing, for authorized development, has been pretty
well resisted in the borough, partly through the successful application of the conservation area rules….without those rules the situation would be a lot worse. Garden-grabbing has been more threatened than realized in my opinion. That’s not to say that it wouldn’t happen if one didn’t continually fight against it. The pressures are there.”
(Civic society representative)

Division of house plots – i.e. within villa-suburbs replacement of a very large dwelling in an extensive garden with a cul-de-sac providing smaller high-status houses (from the 1960s onwards), or (latterly on some such estates) by a low-rise high-status apartment block.

There was very little evidence of this type of development in recent years in Ealing according to residents. This may in part reflect Ealing’s long history of densification, and the prior development of the types of larger villa and sale of development plots in larger gardens.

Infill development on spare or undeveloped plots.

Some infill development is taking place in Ealing. There are also examples of underdeveloped plots of land which could contribute to soft densification through infill development, but to date have not been realised. This is particularly the case with some garage buildings and the tarmac area for parking surrounding them. The presence of single and multiple prefabricated garages either in isolation or as terraces of garages was found in several locations around Ealing. Some were very close to the town centre and Ealing Broadway, on streets that showed signs of extensive SD and de-densification, and others were further away from the centre on less densely developed streets. There was very little land that is considered completely undeveloped with the potential for SD infill.

Change of Use

Change of use to residential development is happening in Ealing at multiple scales. Most interviewees could bring to mind examples of high street office blocks being converted to flats, although their examples tended to fall into ‘hard’ rather than ‘soft’ densification definitions. One example was provided by an interviewee of a school building being converted into approximately eight dwellings, although this was viewed as an atypical example of soft densification.

In addition to the legal types of soft densification it is necessary to note that illegal forms of soft densification are also happening. Whilst not the remit of this research project interviewees regularly returned to the topic of illegal extensions, and in particular in the form of sheds in gardens.

“Garden sheds are becoming semi-habitable rooms. I do know of one guy who owns the house has turned his garden shed in to a gym with a shower in it. I know bloody well what he is doing, he’s sleeping in it and saving himself £100 per night when he comes up from his country cottage. We’re seeing a lot of that further over [illegal].” (Surveyor)

Drivers of ‘soft’ densification

Ealing has undergone an increase in the number of private dwellings demanded over recent years, including (but not exclusively) for one and two bedroom properties.
This increase in the number of units demanded has come from both changes in natural demographics and in in-migration. Recent natural population growth has resulted in an increase in demand for housing in the borough, but historic growth has also resulted in an increase in the number of younger people growing up in the borough who then require their own property as they leave the family home. Whilst increases in house prices have resulted in some changes in behaviour, for example younger people staying in the parental home longer or moving out of the borough, they have also been driven by demand amongst these cohorts for affordable individual dwelling units, with the consequent demand for smaller units given high prices. It was noted that this form of demand was not, *ceteris paribus*, for smaller dwellings. Younger households who grew up in the borough were increasingly unable to afford larger, family oriented dwellings. Consequently, financial constraints were pushing them into one or two bedroom dwellings (and therefore increasing the competition for such dwellings, increasing their prices and supply –with a concomitant further reduction in the supply of larger family dwellings).

Interviewees argued that demand for smaller units was also being driven by in-migration, both from across the capital (and elsewhere within the UK) and from other countries.

**Fig. 18. An example of a single family dwelling converted into 5 flats**

Pierrepoint Road, Ealing (Lat: 51.5144, Long: -0.2734) Photo: Richard Dunning

The demand for smaller dwellings (with one or two bedrooms) from households from across the capital was driven by a combination of characteristics of the area and market. The lower house prices in Ealing in comparison to areas closer to central London makes the borough attractive for households who cannot afford to live in central London.

Some evidence was provided that many households requiring housing were from a demographic group that had previously lived in central London, but were looking to move to a quieter area with different local amenities (e.g. restaurants, schools, green space) from those that the centre offered. The demand for smaller units therefore came from households both looking for their first independent unit in London with strict price parameters and also from households (whose head was 30 to 40 years old) with greater spending power but without a family and looking for an alternative
location in London (i.e. they were looking for a more relaxed lifestyle but not prepared to move to one of the towns outside London, whether for cultural or transportation reasons).

Demand from international in-migrants was considered a result of both the relative price of housing in the borough (when compared to the rest of London) and the historic relationship between the borough and international migrants. Ealing had a reputation as being welcoming to migrants from across the globe. Interviewees gave evidence of the long-term trends in migration into the borough, including large numbers of migrants from Poland following the Second World War, which resulted in some sub-division of properties. Since then the borough has continued to receive international in-migrants from across the globe, leading to a culture of acceptance and of information flows from the borough to potential international in-migrants. The relative peace between international communities living in the borough was affirmed during the 2012 London Riots, which had relatively little impact on Ealing, with the only major disruption attributed to residents from outside the borough. The effect has been to see a continued trend of international in-migration and therefore an underlying level of demand, with historic norms of subdivision and alterations according to both market and cultural demands.

Fig. 19. An example of 2 dwellings sub-divided into multiple flats, extensive off-street parking.

![Image](Mattock_Lane_Ealing_Lat_51.511_Long_-0.3103_Photo_Richard_Dunning)

**Transportation**

Ealing has historically densified in parallel with improvements to the transportation network. The original railway line worked through a largely rural area and led to extensive population growth. The underground has had a similar effect, and now the introduction of a new rail line is leading to further densification. CrossRail is a large rail project linking Reading to the west of London with Shenfield to the east via central London. The under and over ground rail network passes through Ealing, which is the only borough in London that will have four CrossRail stations (Hanwell, West

---

27 See: [http://www.crossrail.co.uk/]
Ealing, Ealing Broadway, and Acton Mainline). It will significantly reduce travel times between Ealing and the City of London and Docklands. The impact of CrossRail has been to significantly increase demand for accommodation in close proximity to the stations:

“CrossRail is having a big impact on demand. The four stations mean it will cut travel times in half for people commuting to the City and Docklands. And for people who are looking for good schools, nice parks and their own garden then CrossRail has opened up a whole new area for them to consider.” (Estate agent)

“One of the most significant factors [in soft densification] is CrossRail. CrossRail is coming to both Ealing Broadway, Ealing and Hanwell. As a crude thing that has pushed up house price about 20-30% in the last year.” (Residents association representative)

“The anticipation of Ealing being within 25 minutes of Canary Wharf, is one which has been hammered by estate agents for a while now. Areas where houses were not so long ago were selling for £350,000 are now selling for over £1 million.” (Civic society representative)

Whilst this was a commonly held view, one interviewee argued that the demand for properties because of CrossRail was limited geographically, but had had a psychological effect on the borough that may have influenced prices.

Demand also arises from younger households living in the borough (whether concealed or revealed). Households that may traditionally have purchased a small family dwelling, cannot now afford those and so there has been a shift in revealed demand to one and two bedroom units. These units do not therefore represent aspirational properties for younger families, but a necessary compromise to stay in the borough.

As well as the prime actors the types of previous property developed is a large influence over both the desirability of particular locations and the potential for re-development or conversion. The borough covers a range of development types and periods, many of which occur in close proximity. For example, on streets adjacent to Ealing Broadway development is observable at regular intervals from the last hundred years and covering multiple tenure and building types. Within the borough, there are areas that comprise significant numbers of larger dwellings from the Victorian (1837-1901) and Edwardian (1901-1910) eras, which were viewed by interviewees as much more likely to be developed due to their larger proportions and attractive facades. This was clearly evident during site visits, with large properties originally designed as single occupancy dwellings (as identified in Figure 18 and 19) showing clear signs of conversion.

“It was a very gentile Edwardian and Victorian development… a lot of large Edwardian villas, accompanied by a further ring of slightly less generous, but still quite large properties radiated out from the rail head at Ealing Broadway, which meant that in terms of land use there was a lot of green space allocated to each house or surrounding space. And in the post war years a lot of these were far too large for average families to occupy, very expensive to maintain. And a very large number of those properties became split into flats, some of them more sensitively than others, as is their wont. So there was a lot of densification of that nature in the 50’s and 60’s.” (Civic society representative)

“[Ealing is] dominated by Edwardian and Victorian developments, a lot of which followed the growth of the railways, either the mainline or the underground. Although there have been later additions, right up to the
In present day. In terms of small-scale housing we are talking about a lot of Edwardian terraces, semi-detached properties up to larger detached Victorian properties.” (Ex-local authority councillor)

Developers of ‘soft’ densification

As outlined above, national policy in the UK is supportive of additional housing development, and this is especially the case in London. There is certainly demand for sub-divided housing and housing built on garden plots, even if that housing is relatively small and without gardens. Additional housing made available through SD can sell for relatively high prices. Whether soft densification takes place depends on the attitudes and behaviour of a range of actors and interests, including: the houseowner / landowners who can see the opportunity to generate revenue, and also developers and architects who may encourage homeowners and landowners to release land or subdivide property. Some individual households, particularly children who have inherited a larger property, have looked to turn the dwelling into income stream. The larger Victorian and Georgian dwellings, which were built with the purpose of housing families and their servants, were considered a burden on some of the households who inherited them. Soft densification allowed households to continue using the dwelling and to earn income (through rent or sale) from part of the property. These households may be active as developers themselves or they may sell an existing property to a development company.

“There are two properties directly opposite us where we knew the parents, and knew the children. The parents have died and the children have inherited the property. They’re living somewhere else and don’t want to move back. They’ve kept the properties and divided them into flats. I can also think of others who have inherited and sold, then they’ve been rented out.” (Residents association representative)

Commercial developers are responding to demand and market pressures. They are concerned about the margins of development rather than delivering a particular product type.

“They are after money, they’re not interested in the property for itself. So they are looking for margins and that means finding the right property to convert, but they’ll be happy to do anything, knock down, extend, sub-divide.” (Surveyor)

Developers are predominantly located in Ealing or in west London. They recognise the streets and specific properties that have the potential to be developed at the necessary margins. Some national and city wide developers are active in Ealing, but focus on the top end of the market or on hard densification rather than SD (for example see below the Dickens Yard development by St Georges; Fig. 19). The nature of soft-densification is also that some of the development is being undertaken by buy-to-let landlords independently from development companies.

“Most of the people involved are local, they might own 20 or 30 houses though, so they are quite big. I mean if you need to find £2 million to buy the houses to convert, then you need some serious money.” (Residents association representative)
Fig. 20: Example of an extended and converted building

Converted from a single household dwelling to multiple flats, with entrances on the ground floor to the left and via the front stairs.
Mattock Lane, Ealing (Lat: 51.511, Long: -0.311) Photo: Richard Dunning

It was also argued that local developers were not very active in systematically seeking to spot opportunities e.g., scouring residential areas and encouraging residents to release land. It was felt that that sort of developer behaviour could lead to significant additional SD especially in suburbs where SD was not particularly pronounced.

Space standards (see the box below) for new building are one minor constraint on the use of garden plots for additional housing in London. London has been exceptional in the UK in retaining space standards for new housing. In some cases poor space standards have led to the rejection of applications for new housing on infill sites.

<table>
<thead>
<tr>
<th>Space Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>In England local planning authorities decide whether to prescribe a minimum space standard for development. Within the National Planning Policy Framework local authorities may only introduce space standards if there is an identified need, if adopting a space standard will not make development unviable and if a reasonable time frame for transition is applied. In order to make space standards binding on development, they must be referred to in the Local Plan.</td>
</tr>
</tbody>
</table>
Previously local planning authorities could determine which space standards to use. However, now if an authority decides to apply a standard it must be the Nationally Described Space Standard\(^{28}\). This standard prescribes the minimum Gross Internal floor Area (GIA) for different sized dwellings that occupy different floors (for example there is difference between 2 bedroom dwellings on one storey and 2 bedroom dwellings split over two storeys).

In London, in August 2010 the Mayor published the London Housing Design Guide\(^{29}\). This guide included suggested housing space standards, but was not a part of the planning process and not legally binding on developers. The guide was part of the large number of extra-planning documents suggesting different space standards and led to criticism from the Housing Standards Review\(^{30}\) of the duplication and in places contradiction of space guides. The Nationally Described Space Standard was a government response to this criticism, providing a simplified uniform standard.

**Planning control and the impacts of soft-densification**

A key issue in the national planning policy context is that SD is being driven by strong support for increased housing development across England. This has made it more difficult for planning authorities to refuse development on grounds of residential amenity or design. The national planning policy framework is in effect permissive of SD (although the removal of gardens from the definition of brownfield land has made this form of SD more difficult). The pro-development emphasis in national policy is particularly pronounced in London because of the aggressive pro-housing policies of the London Mayor. The national policy changes are reflected in local frustration about the impacts of subdivision of houses in some areas of the borough and attempts by the local authority to develop frameworks for managing subdivision and garden development to protect residential amenity.

One criticism of planning in the borough is that there are no clear policies about SD. In particular, the Local Plan has been criticised for not providing clarity over space standards and design for densification. The lack of clear stipulations may deter some application, because such ambiguity may increase the risk of refusal of permission. It also places greater emphasis on the planning officer to make a decision based on design qualities. This approach may be viewed as deliberately ambiguous in order to retain some autonomy for the planning authority.

Ealing LPA has been overtaken by events and changes in the national policy environment, which have made it more difficult to apply previous controls on soft densification. In order to control soft densification, and indeed hard densification, the authority requires quantifiable and clearly defined

---

\(^{28}\) The Nationally Described Space Standard was produced in March 2015 by the Department for Communities and Local Government and may be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421515/150324_-_Nationally_Described_Space_Standard___Final_Web_version.pdf

\(^{29}\) The London Housing Design Guide was published as an interim edition in August 2010 by the London Development Agency and may be found here: https://www.london.gov.uk/sites/default/files/Interim%20London%20Housing%20Design%20Guide.pdf

standards of development and design that are more readily applicable and clear for developers. The LPA faces strong pressures to facilitate market development in order to meet targets for new housing supply. Planning is therefore under pressure to permit soft-densification at the demand of the market rather than constrain it.

“We are constrained by the land we have and the London Plan targets. Planning inspectors have argued that there isn’t enough land allocated, but a poor plan is better than no plan.” (Planning officer)

Soft densification has in effect been ongoing in Ealing for many years, so the scale of the recent wave (i.e. since planning controls were reduced following the change in government in 2010) of densification has been less pronounced than in somewhere like Bristol:

“We are bumping up against the limits of soft densification now…there is very little (properties which could be converted) left.” (Planning officer)

However it should be noted that densification is particularly associated with the housing areas (and larger family houses) built in the Victorian and Edwardian periods (late nineteenth century and early twentieth century). These housing areas tend to have developed around railway and underground stations as London expanded. There is considerable potential for further densification of the large areas of twentieth century private housing stock in the borough. There is evidence of the addition of new housing in these areas through plot subdivision but there is no significant SD movement in those areas. Densification is often limited in family residential areas because a premium is placed on larger houses with gardens. In Ealing SD is balanced by de-densification as wealthy households reconvert previously sub-divided houses. De-densification is largely seen as positive by residents and the local planning authority. What has changed in Ealing is the scale of new housing development on brownfield sites that were not previously used for housing. This is a source of a significant increase in the housing stock and local population.

Local residents are more concerned about levels of ‘hard densification’ than SD. Both residents’ associations and planning officers indicated that there was greater scrutiny of larger developments.

“All of the attention is on big developments, I mean hard densification as you call it. That gets the press involved and that’s where people respond.” (Resident association representative)

Conservation areas and soft densification
The local planning authority highlighted its difficulties in controlling sub-divisions that were felt to detract from residential amenity. As indicated above, a SPD (Residential Gardens Supplementary Planning Document) was introduced in 2013 to strengthen local policy on garden development, but the document was felt to have limited regulatory power because it is not based around quantifiable standards that can be consistently and easily applied. There is concern that qualitative judgement will be challenged if developers seek to appeal against a decision.
Conservation area

The Civic Amenities Act 1967 required local planning authorities to identify geographic areas that have special architectural or historic characteristics, which should be preserved. Local planning authorities then set out the standards of development required in these geographies, termed Conservation Areas, which are normally of a higher standard of development than the overall standards (as outlined in the Unitary Development Plan). The local planning authority may also restrict permitted developments in these areas using an Article 4 directive, which will require alterations to buildings to proceed through a formal planning application.

This is not the case in conservation areas because of the added weight given to maintaining the existing qualities of the residential environment. For example, in the Hanger Lane estate external alterations have been refused permission because the new design is not in keeping with the Art Deco buildings. The constraints arising from Conservation Areas are significant in Ealing because they cover a large proportion of the housing stock that might come under pressure for SD:

“90% of the core of Ealing is in a conservation area…which has obviously inhibited development.”
(Neighbourhood plan representative)

Outcomes of soft-densification

It is evident from both the site visits and interviews that SD is both a historic and contemporary phenomenon in Ealing. There is visible evidence of dwellings being sub-divided in multiple locations in Ealing currently. Interviewees confirmed that the sub-division of the existing dwelling stock was being undertaken across the borough and were aware of numerous local examples. Interviewees suggested that SD was most frequently occurring through the sub-division of existing Victorian and Edwardian semi-detached and terraced properties rather than in ‘garden-grabbing’ or in smaller developments comprising of entirely new-build dwellings.

Housing supply and affordability

Interviewees suggested that both hard and SD trends are being driven by increasing house prices across London and changes to the accessibility of Ealing through the introduction of CrossRail, a major extension to the rail network. The wider house price trends across London were perceived to be pushing house buyers and tenants from more expensive areas of London to the borough. This process encouraged the conversion of dwellings to flats to support households with weak historic ties to the borough who were moving in to the area. The increase in house prices and rents was also viewed as a major ‘push factor’ in encouraging younger, low-income households to move out of the borough.

“(Densification) is not simply increasing the number of people who live in the area, but changing the profile of people who can afford to live in the area…people whose parents or grandparents who lived here can’t afford to live here. The price is going so high.” (DH, Residents Association)

“The investments which people have been putting into these properties has revived some streets… in a purely visual and architectural point of view that has to be welcomed. In other terms… and this is a general social
point, it is adding to the price inflation effects. Ealing is driving out lower income family groups. Houses that are being bought either by extremely wealthy families or by people buying the properties as an investment rather than a dwelling. Certainly in terms of social cohesion, that raises lots of questions.” (TM, Civic Society)

Soft-densification, when viewed as a response to market demand, should have the effect of mitigating increasing house prices. However, in Ealing the level of potential demand is greater than the capacity of the borough, at least to meet through SD. One interviewee argued that allowing the market to dictate the expansion of SD may not produce lower prices for households currently living in the borough.

“Typically people come and go. They don’t care about the community, they don’t contribute, they don’t maintain the properties, I mean buy to let landlords; absentee landlords are a nightmare. They don’t enforce things. They don’t teach their tenants how to recycle their rubbish or be tidy.” (AC, ex-councillor)

There was universal consensus about the need of new housing in the borough. Whilst some interviewees believed that the targets for new development were too high, they still maintained that new housing was needed. To meet the recognized need, interviewees agreed that both SD and hard-densification were required. The LPA implicitly endorses this view through the inclusion of windfall sites (likely to be SD) in its housing target.

Fig. 21: An example of a conversion of a single occupancy family dwelling to four flats

Corfton Road Ealing. (Lat: 51.1221, Long: -0.298) Photo: Richard Dunning
Progressive erosion of the urban environment
The planning authority and residents had some concerns about the cumulative effect of SD on the urban environment in some neighbourhoods.

“The difficulty is that planning deals with it (soft-densification) on a case by case basis, but there is a progressive erosion of the character of a neighbourhood over time…gardens are no longer used or functional for inhabitants…and bins are left on the street.” (Planning officer)

The concern over character erosion was maintained even where the external built form remained unchanged. The sub-division of properties internally may lead to a lower level of care for the gardens and local environment, which would have a cumulative effect on the neighbourhood as more and more properties are converted.

“We are kidding ourselves if we think that by maintaining the built form we are maintaining character” (Planning officer)

The converse opinion was put forward in areas that had undergone a period of ‘decline’, particularly areas with previous conversions to HMOs or used for other purposes. In these cases SD may be viewed as a gentrifying process that is welcomed by some neighbourhood inhabitants.

Soft densification was unlikely to be driving demand for school places and therefore of limited impact on education resources as the types of household living in the resulting dwellings rarely had children.

Support for local shops, services and transport
There has been a well-documented and widespread decline in retail and high street services across the UK in recent years. However, the population of central Ealing has been increasing, partly as a result of SD, but mainly through hard densification. The increases in population have prevented major decline of the high street, although some interviewees commented that the type of shop had changed, moving away from high-end goods towards cheaper consumables.

Increasing the population had led to greater pressure on health services, and resident interviewees expressed concern about access to local health care services including doctor’s surgeries. It was indicated that the local health board had been looking for a new site for a local health facility, but given the space pressures and historic levels of in-fill development had been unable to find an appropriate site within the borough to build one.

Changes in the population type also led to changes in the services demanded. Whilst there was some concern that SD had led to an increase in demand for school places, this was countenanced by most interviewees on the basis that there was unlikely to be demand for school places emanating from one and two bedroom flats. Demographic and ethnic changes in the borough however had led to a change in the demand for particular consumption goods; for example there had been an observable increase in the number of Asian food retailers.
The smaller scale of SD development means that they are unlikely to pay significant amounts of betterment tax (S106, Community Infrastructure Levy or affordable homes; see the box below) to the local authority. Therefore, whilst the increasing number of properties supported an increase in the council tax revenue, it was felt by some interviewees that they would like the LPA to limit the amount of SD and to balance this with promotion of some larger developments in order to recoup greater revenues to support local services.

**Planning obligations**

Over recent years in England there has been a range of compulsory financial contributions on housing development. Currently it is permitted for local authorities to insist that developers pay three types of planning obligation in order to ensure that the impact of the development is mitigated. The three types of obligation are the Community Infrastructure Levy, Section 106 agreements and Section 278 highway agreements. The local authority is only permitted to charge these obligations for a development if the contribution is necessary to make the application appropriate on planning grounds.

The Community Infrastructure Levy has undergone several iterations; the latest guidelines were produced in 2014. The levy is charged by local planning authorities on new developments, over 100m² gross internal area. It is collected to fund infrastructure developments necessary in the authority, but the definition of infrastructure is broad and may include things like flood defenses, transport, social and health care. All development is charged at a fixed rate per m². Some development types are not required to pay the Community Infrastructure Levy, for example self build dwellings, charitable development and social housing.

Section 106 was the main mechanism for gathering obligations from development in the early 2000s, but has largely been replaced by the Community Infrastructure Levy. It is a legal agreement between the developer and the local authority and may relate to any planning aspect required for the development to proceed. It has historically been used to finance affordable housing, whether on or off site and infrastructure, including schools. The scale of the obligation frequently reflected the scale of the development, with small developments unlikely to have an agreement. The agreement may work either way, ensuring that the local authority or the developer complete certain actions or payments before stages of development, for example ensuring that a new road is built prior to a specific date.

S278 highway agreements refer to works carried out to existing roads in order to facilitate new developments. The works may be carried out by either the developer or paid for (in full or in part) by the developer. These agreements are between the developer and local planning authority (acting as the highways authority) or secretary of state.

The NPPF sets out clearly that these obligations should only be pursued by the local authority where they are necessary to make the development acceptable in planning terms.
De-densification

Interviewees argued that de-densification/re-conversion is recognized as a contemporary phenomenon in Ealing, and was noticed by local residents. External signs of re-conversion are more difficult to find during fieldwork. However, some buildings showed signs of renovation that had not led to sub-division. In Figure 23 the dwelling on the right hand side had been recently renovated and was being sold as a single family dwelling, whilst the building on the left hand side had previously been converted into multiple flats.

“There have been quite a number of re-conversions back to family homes, from ones that have been split…it has been a significant and notable characteristic of the area…With a large number of conservation areas, which came in the 1970’s there was a lot more restriction on splitting up properties and so that trend virtually stopped. So in the traditional areas of Ealing, that hardly happens at all now.” (TM, Ealing Civic Society)

Interviewees argued that de-densification was more likely to be taking place in confined areas of the borough with particular forms of dwelling (size, age and character) and with particular locational advantages (proximity to parks and transport connections). Areas within walking distance of Ealing Broadway were considered most desirable and likely to be de-densified.

“De-densification is a very interesting phenomenon. It has happened only recently and only in very specific locations. Places close to Ealing Broadway are some of the most desirable in the borough and there are greater pressures there (for de-densification), that’s where the ultra wealthy want to live” (Planning officer)

The pressures to convert multiple flats into single occupancy dwellings was perceived to be being driven by increases in ‘family-home’ house prices in other areas of London (e.g. Richmond, Chiswick).

Fig. 22: An example of a dwelling with on-going basement conversion to increase the residential floor plate.

Amherst Road, Ealing (Lat: 51.5169, Long: -0.3131) Photo: Richard Dunning
These trends are forcing new families (with above average incomes) to consider properties elsewhere, and the historic associations with Ealing as the Queen of the Boroughs with large parks leads to its promotion as a borough receptive to ‘family-life’. Ealing has high quality independent and state education provision, which adds to its attractiveness for families (although densification has an impact upon the competition for places and pressures on state education resources).

De-densification and SD may occur within the same plot of land, as sub-divided properties are converted back to single occupancy dwellings and at the same time are extended (either in above ground plot coverage or through basement extensions).

“I know a house that exchanged for well under a million less than five years ago, the new owners came in, dug a basement, did all sorts of things, moved out and has just put it on the market for £3.5 million. That kind of changes has taken place in the conservation areas.” (TM, Ealing Civic Society)

The re-conversion of flats back to single occupancy dwellings is viewed positively by local councillors and planners. This is motivated by a perception that households living in larger dwellings are more likely to make extensive links and contributions to community life.

Fig. 23: An example of a conversion to multiple flats (left) and recent renovation culminating in a single family dwelling (right)

Woodville Road, Ealing (Lat: 51.5183, Long: -0.2999) Photo: Richard Dunning

“Conversion back to single occupancy would almost always be seen as a good thing, because so much has been lost and single family properties… tend to be owner-occupied and those are the sort of people who take more interest, they tend to take more care and concern with the community, they’re going to have families they want...
Despite this positive outlook on the re-conversion of properties, currently no policies have been noted as deliberately supporting this process, and the requirement for an increase in the number of dwellings in the area may be countering this desire. One interviewee suggested that if the authority viewed a de-conversion application negatively they could argue on the basis of the London Plan that there should be no net loss of dwellings.

**Hard densification**

Hard densification was both visibly recognized and confirmed through interviews as a historic and contemporary phenomenon in Ealing. Significant residential developments have been completed and are ongoing in the borough, particularly near Ealing Broadway. The Dickens Yard development, advertised by Berkeley Group, is symptomatic of the high value of hard residential densification taking place in Ealing. Currently properties are being marketed for between £699,950 and £2,100,000. Whilst these very high density developments represent hard densification rather than SD it is not possible to discern the impact of these distinct types of development where they co-exist. Whether the pressures from densification, for example on school places and transport links, comes from ‘hard’ or SD types was not be apparent to local residents. Interviewees articulated that larger developments were more likely to receive greater attention and concern than small-scale developments from local residents, but that this may be a manifestation of the visibility of these projects and a failure to grasp the cumulative impact of soft densification.

**Fig. 24: An example of ‘hard’ densification in Ealing.**

Brownlow Road, Ealing (Lat: 51.5108, Long: -0.3261) Photo: Richard Dunning

The pressures on the local authority and local communities following SD and de-densification should also be placed in the wider demographic context. One interviewee suggested that pressures...
on resources over the next five years were likely to increase as a result of natural population growth rather than increases in the number of dwellings through SD or ‘hard’ densification.

Hard densification is also taking place outside planning control, through permitted developments of office to residential conversions. The conversion of properties is most often hard densification, but also takes place at a smaller scale.

f. Summary

The London Borough of Ealing has a long history of densification in various forms and of immigration, whether local or international. The views of estate agents, planning officers and residents are influenced by this history and by the continuation of these trends today. The borough is a popular suburban location subject to high demand for housing. The limited amount of green field space (without development restrictions) in the borough and the inability to expand outwards has increased the upward pressure on house prices. This has been translated into a demand for more densification of various types in some parts of Ealing but also, in contrast, to de-densification to produce single occupancy larger family dwellings in other parts of the borough. The extensive trends of soft densification and de-densification recorded between 2001 and 2011 continue today.

Situated within the UK’s largest city and with the demand for housing increasing across London, policy responses by Ealing LPA are affected by wider housing and economic trends outside its control. Ealing is confined to acting internally to alleviate these pressures. The LPA has extensive and detailed spatial information about the housing market, housing demand, the built environment and planning applications. This information provides a platform for detailed analysis and supports the development of local policies for the borough as a whole or for specific locations within the authority’s jurisdiction. The quality of data limits detailed analysis of the areas where SD may take place, restricting understanding of the drivers of densification or its impact on local services.

The types of SD that occur vary across Ealing. Three factors combine to influence this variation: the capacity of the historic physical form (morphology) of the built environment to accommodate densification; access to transport; and access to services. The large Victorian and Edwardian villas in Ealing offer significant potential for subdivision and extension and are close to major transport links and to popular green spaces. This makes them a target for SD. However, in some locations these properties are now in demand from affluent families and are being re-converted to single occupancy dwellings.

The relationship between SD and demand for services is circular. The imminent construction of the CrossRail station has had an impact on housing demand within the borough, particularly in areas close to the stations. The CrossRail station will be operational in 2019. Improving the transport links of existing housing has therefore increased SD pressures and the consequent level of demand for a range of public services (e.g. doctors) and transportation (including CrossRail itself). The impact of
hard densification on demand for services is easier for the local authority to identify, model, analyse and address than the cumulative impact of SD.

Where SD has occurred gradually over time both residents and planners agree that there has been a cumulative detrimental impact (often considered an erosion) on the character and aesthetics of a neighbourhood. This was the case even when the built form remained constant, because issues such as litter and garden-upkeep led to a change in residents' perceptions of the neighbourhood. This longer-term trend may have unplanned consequences as the small-scale nature of incremental development is difficult to quantify, analyse and address.

There is a difference between the types of developer engaged in hard densification and SD in Ealing. Whilst national builders and development organisations tend to focus on large scale sites, smaller, localized or citywide builders are more likely to develop smaller sites in Ealing. These organisations may have detailed local knowledge of the housing market, expertise in developing small sites or a willingness to take risks that larger developers do not have. Any policy intervention focusing on SD, for example over space standards, needs to recognize the impact the intervention will have on the particular types of builder involved in the process of development in Ealing, in this case it must recognize the limitations on smaller developers.

Soft densification is often preceded by a change in ownership. For example, interviewees argued that the sub-division of properties frequently followed the inheritance of a property, because new owners seek to raise either a capital sum (through sale) or an income stream (through rent) from the property. Understanding the tenure and demographic characteristics of a neighbourhood may therefore support modeling of the neighbourhood’s propensity to be subject to soft densification.

In response to the pressures for SD, the council in Ealing has taken a qualified approach. The council recognizes the significant shortage of housing in the borough and the ability of SD to add housing units, however it has also sought to mitigate some of the potentially more damaging aspects of soft densification. In particular the council has sought to maintain space standards to prevent internal overcrowding and have begun to create policies to maintain garden space, although this has not been fully implemented yet. To date the council has been using general policy documents (such as national spaces standards) to control SD rather than a bespoke SD policy. This approach has given the council some flexibility in how it responds to individual applications, in some circumstances highlighting particular policies and in other applications being less stringent. The council has not found a mechanism for fully funding the increase in service costs through SD.

**Covert Development**

The extent of covert development, or illegal densification, is difficult to know with certainty, as is the impact of this type of development on residents and neighbourhood characteristics. Illegal densification may take the form of any of the types of soft densification (subdivision, infill etc) and represents any form of development without permission, or using a permitted building for a restricted use. Illegal development has received significant attention by the media over the last few years. Phrases like ‘beds in sheds’, which is used by some in the media and politics to describe illegal...
outhouses, have popularised a view that these developments are having a negative impact on the
neighbourhoods and are predatory towards tenants. An article by The Telegraph in 2013 ran the
headline “Blighted by an epidemic of ‘beds in sheds’”. The issue of illegal densification in this report
was not addressed through primary methods in this research, the analysis is therefore based on
secondary sources.

In response to widespread media coverage of illegal housing in London, the local authority in Ealing
produced a report on illegal outhousing in Ealing in 2013 (Ealing, 2013), this report does not cover
every form of covert densification, but focuses on residential structures external to the main
residential dwelling on a site. Out of 4448 inspections undertaken by Ealing’s inspection team, 227
structures were classified as occupied but unauthorised outhouses. The effect of these illegally
occupied structures has been difficult to measure, although there are concerns that increased risks,
associated with environmental health and fires, and neglect of urban spaces (littering etc) may
follow, although these links were unproven.

In response to the public and political pressure, alongside concerns from the fire brigade the
borough created a specialist project team to deal with illegal housing comprising of 2 planning
officers, 5 environmental health officers, 1 housing officer, 1 project manager and 1 building control
officer. The team has enforced the demolition of dozens of outhouses through serving notice of the
intent to take the owner to court. The impact of these demolitions on housing affordability and
neighbourhood characteristics is not possible to quantify.
5. Case Study Two: Bristol

During October to December 2015, a case study of SD was undertaken of Bristol city (Fig. 25). This section provides an overview of the borough and describes the results of this analysis. It is based on the Phase I statistical analysis, a review of policy in Bristol relevant to SD, a series of site visits to Bristol and interviews with key local actors.

Fig 25. Bristol local authority in dark blue and surrounding local authorities in England and Wales

a. An overview and the political context

Bristol is set within the wider sub-region of the West of England which comprises the four unitary local authorities of Bristol at the core, surrounded by North Somerset to the South, Bath and North East Somerset (BANES) to the East, and South Gloucestershire to the North (Fig. 26). It has a total population of over 1.1 million. According to the Population of Bristol Report, commissioned by Bristol City Council in 2015, Bristol’s population has increased by 46,700 (11.8%) over the last decade. This compares to an England and Wales increase of 8% over the same period. The growth in population can be attributed to an additional 10,000 students living in Bristol during term time, a significant increase in net-international migration, a significant increase births, and a decrease in the number of deaths. Recently net international migration has stabilised, and births are the current main driver of population growth, though they peaked in 2012 and have since fallen.

It is often described as an outstanding strategic location (West of England LEP, 2012), reflecting its high level of connectivity to the road and rail network, and its fast expanding airport. It is aspirational and has ambitious objectives for the economy and employment borne out by a strong record of growth. Bristol was one of the top ten cities for business growth during the period 2004-13 (Centre for Cities, 2015), and the population of the West of England as a whole continues to increase at a rate higher than the national average. This is in part due to the economic success of Bristol and the in-migration this fuels, but also because of the perceived high quality of life in the West of England, with its vibrant urban centres of not just Bristol, but Bath (a city inland and to the south east of Bristol) and Weston-Super-Mare (a coastal town to the south west of Bristol) too, and the high quality residential and natural environment offered.

**Fig 26. Bristol local authority in dark blue and surrounding local authorities in England and Wales**

The administrative boundary of Bristol City Council does not encompass the extent of Bristol’s built up area and in fact expansion of the city has resulted in roughly a third of the agglomeration falling within the jurisdiction of the three neighbouring local authorities. Bristol is also tightly bounded by green belt, and there remains strong political opposition in each of the neighbouring authorities to substantial development in the green belt, despite ongoing development pressure to release sites here. Each of the four local authorities in the West of England has a different political make up, and rarely has any of the four been static in political leadership terms. The recent introduction of an elected mayor for Bristol City itself has added a new dimension to the politics of the sub-region. Bristol City Council itself is currently composed of 30 Labour councillors, 16 Conservative councillors, 14 Green councillors, 9 Liberal Democrat councillors, and a single UK Independence Party councillor. As a LPA, Bristol City Council is responsible for determining planning permissions within the area, in line national policies (see detailed section below on planning policies). The political differences with neighbouring authorities, coupled with the tight administrative boundary of
Bristol and the extent of the green belt, have made reaching agreement about accommodating the future housing needs of Bristol challenging.

**Housing Stock**

Bristol’s planning history is one of densification. Bristol City Council (BCC) prepared a number of local area context studies to inform the development of their most recent core strategy, and almost without exception, these studies report “centuries of urban growth and densification” (Bristol City Design Group, 2013a, 4). Housing supply has not kept pace with strong economic growth. There are 14,000 people on the housing need register in the city (Onions 2015, 1), and it was recently described as one of the top 10 least affordable places, after London, Oxford and Cambridge: “bounded by a green belt, however, it has struggled to provide the homes needed to meet the demand from individuals coming to work in the city” (Carter 2014, 1). The forecasted house price rise of 24% over the next five years in Bristol is largely attributed to rising employment levels and wage growth levels (Jones Lang LaSalle, 2015).

“Bristol is suffering from a serious under supply of housing. It is crucial that more homes are built, particularly for younger families and first time buyers…. It is important that they [Bristol City Council] recognise the responsibility they have to communities in their area” (Baseley, 2012, 1).

According to Bristol’s 2012 Private Sector Housing Stock Condition Survey, the housing stock comprises a significantly above average proportion of pre-First World War Victorian housing (See Figure 27). Similarly, inter-war period housing also represents an above average proportion, whilst housing built between 1945 and 1990 is found at lower than average proportions.

**Fig. 27 Dwelling age profile England and Bristol**

![Graph showing dwelling age profile](image)

Source: House Condition Survey 2011 and EHS 2009

---

32 Opinion Research Services (2012), Private Sector Housing Stock Condition Survey, Prepared for Bristol City Council
As well as the older age profile of dwellings in Bristol, the Private Sector Housing Stock Condition Survey revealed that there are also higher proportions of converted flats and Houses in Multiple Occupation than in England\(^{33}\). This is thought to reflect the large private rented sector with which they are typically associated.

### Table 10. Total Housing Stock and by Tenure in Bristol, 2001 and 2011

<table>
<thead>
<tr>
<th>Variable</th>
<th>2001</th>
<th></th>
<th>2011</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>%</td>
<td>Count</td>
<td>%</td>
</tr>
<tr>
<td>Total Stock</td>
<td>169,675</td>
<td>100.0</td>
<td>188,440</td>
<td>100.0</td>
</tr>
<tr>
<td>LA Stock</td>
<td>32,242</td>
<td>19.0</td>
<td>28,404</td>
<td>15.1</td>
</tr>
<tr>
<td>RSL Stock</td>
<td>7,752</td>
<td>4.6</td>
<td>10,929</td>
<td>5.8</td>
</tr>
<tr>
<td>Other Public Sector Stock</td>
<td>500</td>
<td>0.3</td>
<td>500</td>
<td>0.3</td>
</tr>
<tr>
<td>Owner Occupied &amp; Private Rented Stock</td>
<td>129,181</td>
<td>76.1</td>
<td>148,610</td>
<td>78.9</td>
</tr>
</tbody>
</table>

Source: Census, 2001, Census 2011

### Tenure

The 2012 Bristol Housing Stock Condition Survey states that at 20\%, the proportion of socially rented dwellings is slightly higher in Bristol than nationally (18\%). In addition, whereas in England there are roughly equal proportions of Housing Association (RSL) (9\%) and Local Authority (9\%) dwellings, in Bristol the proportions are skewed in favour of Local Authority (14\%) rather than RSL (6\%).

In 2011 the owner occupied stock represented 59\% in Bristol compared with 68\% nationally, while the private rented sector was higher at 21\% compared with 14\% nationally. In 2001 the proportion of private rented dwellings was just 12\% in Bristol, and the increase over the intervening decade has been geographically uneven and driven by demand and suitability of housing stock\(^{34}\).

### Overcrowding

The 2011 Census allows for an estimate of overcrowding to be made, which is defined as households with at least one bedroom too few for the occupants. At 13.1\% Bristol’s level of overcrowding was much higher than the South West average (6.4\%) and the England & Wales average (8.6\%).

### Market Rental Levels

In Q1 2015, The Valuation Office Agency revealed that Bristol’s average rent of £888 was higher than the South West (£708), and England (£768). Compared to data from the previous year, this represents an above average rise of 9.1\% in Bristol, compared to 2.2\% in the South West and 6.7\% in England over the same period.

### Social Housing Rental Levels

In 2002, average social housing rents were approximately £57.42 per week in Bristol, compared to £55.75 in England. Between 2001 and 2011, social housing rents in Bristol rose 42.5\%, in line with

\(^{33}\) Opinion Research Services (2012), Private Sector Housing Stock Condition Survey, Prepared for Bristol City Council

\(^{34}\) Opinion Research Services (2012), Private Sector Housing Stock Condition Survey, Prepared for Bristol City Council
England (42%). In 2014 the ONS reported that average social housing rents were approximately £92.03.

**House Prices**
The West of England has some of the highest house prices in the country. Bristol is in the top 10 places most unaffordable places in the UK (Carter, 2014), and there is substantial and significant housing need in all four local authorities (Bath & North East Somerset, Bristol City Council, North Somerset Council and South Gloucestershire Council) and an urgent need to increase affordable housing provision. Infrastructure has arguably not always progressed at the same pace as growth, traffic congestion is an issue in many parts of the city, and there are shortages of school and GP places.

In September 2015, the Land Registry reported that average house prices in Bristol were £209,483, representing an 8.6% annual increase. This compares to £193,435 (4.4%) in the South West, and £186,553 (5.3%) in England and Wales over the same period.

**Demographic Data**
Bristol’s population is about 437,500, making it the largest city in the South West. It is set to increase by 95,700 people over the 25 year period (2012-2037) to reach a total population of 528,200 by 2037. This is an increase of 22.1% (Bristol City Council, 2015a, 2). It is one of England's eight self-styled 'Core Cities'. Bristol has witnessed strong economic growth, and is the perceived economic powerhouse of the South West, with the financial services industry and high-tech employers being important parts of the employment mix. Prior to the recession, it saw over the 10 year period to 2008, the highest net additional number of private sector new jobs of any city other than London (Webber and Swinney 2010, 1). These pre-recession levels of growth are now returning.

Followed a period of population decline in the post war years and a period of stabilisation in the 1990s, BCC reports a “period of unprecedented population growth in Bristol since 2002” (Bristol City Council 2015a, 2), with growth having been particularly concentrated in Bristol’s more central areas. Since 2004, the total population of Bristol Local Authority is estimated to have increased by 46,700 people (11.8%), 10,000 of which is accounted for by an increased student population in the city during term time (ibid, 9). Bristol City Council reports that

> “The large increase in the population of Bristol between 2004 and 2014 can be attributed to a number of factors including a significant increase in net international migration, a significant increase in births and a decrease in the number of deaths… increasing births is now the main driver of population growth” (ibid, 16).

In terms of small area trends, data shows significant estimated increases in population in nearly all wards in Bristol, with only three wards showing a decrease. Cabot and Lawrence Hill, the two wards showing the highest rates of population growth, are reported to have grown significantly as a result of net-migration: in Cabot this is attributed to a significant rise in the student population of the area.

---

35 The Core Cities Group is a collection of eight major English cities outside London. They are: Birmingham, Bristol, Leeds, Liverpool, Newcastle, Nottingham, Manchester and Sheffield. They work together on some policy and pressure group situations to work for greater power and autonomy for major cities. The group also includes Cardiff and Glasgow when considered in the UK context.
and in Lawrence Hill this is attributed to international migration, with a high Black and Minority Ethnic population and a high level of rented accommodation in the area.

According to Bristol City Council’s 2015 Population of Bristol report, the Black or Minority Ethnic group (BME) population represents 16% of the total population, an increase from 8.2% in 2001\(^\text{36}\). Using an alternative definition of the ethnic population, which includes the Eastern European population, increases this proportion to 22% of the total population – an increase from 12% in 2001. As can be seen in Figure 28, the Black and Minority Ethnic population is extremely heterogeneous geographically within Bristol.

**Fig. 28. 2011 Black and minority ethnic population.**

Source: Office for National Statistics © Crown Copyright 2013 [from Nomis]

---

**b. Overview of Soft Densification and De-conversion in Bristol 2001-2011**

As described above, densification in Bristol should be considered in the wider context of the West of England towns and local authorities, which include the city of Bristol. Tables 11 and 12 may be

---

\(^{36}\) Bristol City Council (2015) The Population of Bristol Report
compared directly to Table 4 in the Phase I report and represent Single Family Residential Neighbourhoods in urban areas. It is evident that Bristol has a higher proportion of new dwellings gained from SD than neighbouring towns and local authorities. The figures for Bristol in Table 11 and 12 are not directly comparable as they represent two distinct geographies. Table 11 considers the urban area Bristol, which has a larger boundary than the local authority boundary of the City and County of Bristol which is represented in Table 12, hence the larger dwelling number in the urban area Bristol than within Bristol City Council’s responsibility. The 2001 Physical Urban Area named 'Bristol' stretches into South Gloucestershire. The higher level upper urban area (in table 11) also includes the disjoint areas of Stoke Gifford and Frampton Cotterell, Mangotsfield and Kingswood in South Gloucestershire. Thornbury and Chipping Sodbury are treated as freestanding towns in South Gloucestershire. Clevedon, Keynsham, Nailsea, Portishead and Weston-Super-Mare are treated as freestanding towns in North Somerset. Keynsham and Norton-Radstock along with Bath are treated as freestanding towns in Bath and North East Somerset. Physical settlements with 2001 populations less than 10,000 such as Long Ashton and Pucklechurch are within the rural domain and excluded.

As Figure 30 shows, there is a clear division between SD happening in Bristol city centre and to the north, east and south, whilst negative soft densification is occurring in the north west around Stoke Bishop, one of the most affluent areas of the city.
### Table 11: Soft Densification in Bristol and Significant Towns, 2001 to 2011

<table>
<thead>
<tr>
<th>Town</th>
<th>Number of dwellings, 2001 (PAF)</th>
<th>Percentage net increase in number of dwellings between 2001 and 2011 (PAF)</th>
<th>Number of new build dwellings as % of 2001 stock (LUCS)</th>
<th>Proportion of dwellings gained through soft densification between 2001 and 2011 (PAF and LUCS)</th>
<th>Increase in residential density in SFRNs from soft densification (PAF and LUCS)</th>
<th>Share of net change attributable to all forms of soft densification</th>
<th>Pet Intern</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bath</td>
<td>34108</td>
<td>4.84</td>
<td>2.53</td>
<td>-0.03</td>
<td>0</td>
<td>-0.54</td>
<td>4844.44</td>
</tr>
<tr>
<td>Bristol</td>
<td>210850</td>
<td>9.43</td>
<td>6.06</td>
<td>4.74</td>
<td>0.82</td>
<td>50.27</td>
<td>60.49</td>
</tr>
<tr>
<td>Chipping Sodbury</td>
<td>13368</td>
<td>2.39</td>
<td>1.44</td>
<td>1.51</td>
<td>0.24</td>
<td>63.32</td>
<td>75.74</td>
</tr>
<tr>
<td>Clevedon</td>
<td>8517</td>
<td>8.57</td>
<td>2.5</td>
<td>0.27</td>
<td>0.05</td>
<td>3.15</td>
<td>-308.7</td>
</tr>
<tr>
<td>Keynsham</td>
<td>5507</td>
<td>3.32</td>
<td>4.3</td>
<td>1.85</td>
<td>0.29</td>
<td>55.74</td>
<td>39.22</td>
</tr>
<tr>
<td>Nailsea</td>
<td>6835</td>
<td>3.25</td>
<td>2.37</td>
<td>-0.09</td>
<td>-0.01</td>
<td>-2.7</td>
<td>1250</td>
</tr>
<tr>
<td>Norton-Radstock</td>
<td>7374</td>
<td>5.95</td>
<td>4.18</td>
<td>-0.27</td>
<td>-0.04</td>
<td>-4.56</td>
<td>715</td>
</tr>
<tr>
<td>Portishead</td>
<td>6847</td>
<td>27.3</td>
<td>14.47</td>
<td>0.95</td>
<td>0.12</td>
<td>3.48</td>
<td>12.31</td>
</tr>
<tr>
<td>Thornbury</td>
<td>4528</td>
<td>2.87</td>
<td>2.67</td>
<td>0.88</td>
<td>0.14</td>
<td>30.77</td>
<td>-5</td>
</tr>
<tr>
<td>Weston-Super-Mare</td>
<td>31385</td>
<td>9.46</td>
<td>6.12</td>
<td>0.8</td>
<td>0.15</td>
<td>8.45</td>
<td>-109.16</td>
</tr>
</tbody>
</table>

### Table 12: Soft Densification in the City and County of Bristol and Surrounding Local Authority Areas, 2001 to 2011

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Number of dwellings, 2001</th>
<th>Percentage net increase in number of dwellings between 2001 and 2011</th>
<th>Number of new build dwellings as % of 2001 stock</th>
<th>Proportion of dwellings gained through soft densification between 2001 and 2011</th>
<th>Increase in residential density in SFRNs from soft densification</th>
<th>Share of net change attributable to all forms of soft densification</th>
<th>Pet Intern</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bristol</td>
<td>145847</td>
<td>9.72</td>
<td>6.17</td>
<td>4.93</td>
<td>0.31</td>
<td>50.71</td>
<td></td>
</tr>
<tr>
<td>North Somerset</td>
<td>53584</td>
<td>10.81</td>
<td>6.13</td>
<td>0.62</td>
<td>0.01</td>
<td>5.75</td>
<td></td>
</tr>
<tr>
<td>Bath and North East Somerset</td>
<td>47678</td>
<td>4.86</td>
<td>2.96</td>
<td>0.19</td>
<td>0.00</td>
<td>3.88</td>
<td></td>
</tr>
<tr>
<td>South Gloucestershire</td>
<td>82366</td>
<td>7.43</td>
<td>4.98</td>
<td>3.69</td>
<td>0.06</td>
<td>49.67</td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td>329475</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>London Borough of Ealing</td>
<td>89531</td>
<td>5.26</td>
<td>2.61</td>
<td>1.75</td>
<td>0.28</td>
<td>33.21</td>
<td></td>
</tr>
</tbody>
</table>
Fig. 29 West of England: Soft Densification 2001-2011
Fig. 30 West of England: Soft Densification 2001-2011 (300m moving average)
c. Current Planning and Densification Policy Environment

The national planning policy context in Bristol is the same as that described in the LB Ealing case study.

Regional Policy

Since the abolition of Regional Spatial Strategies (RSS) by the Coalition led Government in 2010, there has been no strategic/regional planning policy between the national level (NPPF) and local authority core strategies. London is the only exception to this, with regional policy in the form of the London Plan, with which the London Borough core strategies must conform. This means that in Bristol the core strategy is developed in accordance with the strategic policy guidance in the NPPF, and local evidence and priorities.

It is worth noting that the immediate reaction of many LPA in southern England to the abolition of the RSS was to announce the intention to implement large reductions in planned housing numbers compared with previous RSS targets. This was the case for all four authorities in the West of England entity, including Bristol. Initial proposals in their draft core strategies saw proposed reductions of more than 44,000 dwellings over five years. The four authorities were in the top 10 nationally in terms of the scale of the proposed cuts. The 2010 planning reforms were, initially at least, interpreted as an opportunity to reduce housing plans and resulted in planned major urban extensions – largely in the green belt around Bristol – being withdrawn in favour of housing growth being contained within the sub-region’s urban areas.

That the planning reform coincided with a recession provided some initial justification, for it. However, substantial concerns were expressed by those within the development industry and beyond about the potential impact of these reductions on the medium and longer term growth prospects of the West of England, in a post-recession landscape where LPAs would be seeking to capitalise on the economic advantages of the sub-region (see Boddy and Hickman, 2013).

Local Policy

Bristol Core Strategy

Bristol’s core strategy was adopted in 2011 and sets out the council’s strategic vision for development between 2011 and 2031. Overall, the authority will continue to focus on previously developed land as the main source for development over the plan period:

“The majority of recent development in Bristol has been on previously developed land. Residential completions on previously developed land have exceeded 95% over the last 10 years. It is expected that previously developed land will continue to play a significant role in meeting housing and other development requirements across the city. Land continues to be used efficiently within the city, with 96% of residential completions since 2000 exceeding 30 dwellings per hectare. The efficient use of land requires appropriate densities to be achieved for all development. This will depend on the level of accessibility to employment opportunities, services and other facilities. Modelling undertaken by the council indicates that most areas of the city have good accessibility to these uses by public transport, walking and cycling (Bristol City Council, 2011, 117).
There are two strategic policies that are particularly relevant to SD: Policy BCS5, Housing Provision and Policy BCS20 – Effective and Efficient Use of Land.

The first, BCS5, sets out the council’s housing targets for the plan period, which states clearly that:

“Development of new homes will primarily be on previously developed sites across the city. Some new homes will be developed on open space which does not need to be retained as part of the city’s green infrastructure provision” (ibid, 55).

The policy makes it clear that whilst the contribution from small unidentified sites does not form part of the identified supply and minimum target, the development of about 4,200 homes from this source from 2012 to 2026 is “reasonably likely” and will contribute to the delivery of the overall target of 30,600 homes. Although currently unidentified, the expectation that over 4,000 homes will be delivered on small sites is substantial.

The second, BCS20, provides strong policy support for using land efficiently and maximising opportunities for the re-use of previously developed land. It also provides the policy framework for achieving higher densities where accessibility (existing and improved) would allow. It is set out in full below.

**Policy BCS20**

New development will maximise opportunities to re-use previously developed land. Where development is planned opportunities will be sought to use land more efficiently across the city. Imaginative design solutions will be encouraged at all sites to ensure optimum efficiency in the use of land is achieved. Higher densities of development will be sought:

- In and around the city centre;
- In or close to other centres;
- Along or close to main public transport routes.

For residential development a minimum indicative density of 50 dwellings per hectare will be sought. Densities below 50 dwelling per hectare should only occur where it is essential to safeguard the special interest and character of the area. The appropriate density for any individual site will be informed by:

- The characteristics of the site;
- The local context;
- Its current and future level of accessibility by walking, cycling and public transport to a range of employment, services and facilities;
- The opportunity for a mix of uses across the site;
- The need to provide an appropriate mix of housing to meet the community’s needs and demands;
- The need to achieve high quality, well designed environments.
It is clear from the above policy that there is no blanket approach to density, instead appropriate development density will be determined by the particular location and characteristics of a site. This potential for spatial variegation in density is further reinforced by specific site allocation policies, such as BS2 – City Centre – where high density mixed use development is encouraged, and policy BCS3 – Northern Arc and Inner East Bristol Regeneration Areas – where higher densities in accessible locations are encouraged. Many parts of the city subject to SD, such as Bishopston, Cotham, and Redland do not have specific site allocation policies, and therefore any development will be unidentified in the plan, SD on small sites, sub-division etc. and subject to policy.

**Site Allocations and Development Management Policies Local Plan**

The above document was adopted by Bristol City Council in 2014. Its purpose is to provide detailed designation, site allocations, and development management policies (often criteria based), to enable decision making in the context of the strategic policies of the core strategy. There are three policies that are particularly relevant to SD detailed below but others, including those on design, local character and distinctiveness, transport, and employment land, are also important.

The first, Policy DM1, is the presumption in favour of development in line with the NPPF: “Bristol City Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible” (2014, 7).

The second, Policy DM2: Residential Sub-division, Shared and Specialist Housing, acknowledges that, “the sub-division of existing accommodation and the supply of shared housing provide an important contribution to people’s housing choice” (2014, 8).

Development proposals that fit within this category include:

- the sub-division of existing dwellings to flats;
- the conversion of existing dwellings or construction of new buildings to be used as houses in multiple occupation; and
- the intensification of existing houses in multiple occupation.

The policy is clear that proposals will not be permitted where:

(i) The development would harm the residential amenity or character of the locality as a result of any of the following:
   - Levels of activity that cause excessive noise and disturbance to residents;
   - or Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures;
   - or Cumulative detrimental impact of physical alterations to buildings and structures; or
   - Inadequate storage for recycling/refuse and cycles.

(ii) The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following:
   - Exacerbating existing harmful conditions including those listed at (i) above;
   - or Reducing the choice of homes in the area by changing the housing mix.
Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies. (Bristol City Council 2014, 8)

The provision of specialist student accommodation is identified as being acceptable in the city centre and other potential locations subject to the criteria on potential harm.

The third, policy DM21, contains policy on the development of private gardens. The supporting text accompanying the policy is clear that meeting the city’s ambitious housing targets has not been predicated on any assumptions about a contribution coming from gardens. Thus, any development of private gardens is counted as ‘windfall’ housing: ‘windfall’ referring to sites which become available for development unexpectedly and are not, therefore, allocated sites in a planning authority's development plan. It states that: “development of garden land may be appropriate where it would contribute to sustainable forms of development. Where such developments occur they can make a limited but useful contribution to the overall supply of new homes” (ibid 2.21.2). It reiterates strategic policy in the core strategy seeking higher densities of development in appropriate locations, and states that the potential loss of a garden may be deemed acceptable subject to other development management policies, particularly where “improvements to urban design may occur, for example, where the development would fill an incongruous gap in an otherwise built-up frontage” (ibid, 2.21.4).

So whilst overall the policy provides a general presumption in favour of protecting private gardens from development, it does provide a set of limited circumstances where their development may be acceptable, as follows:

**DM21 - Development of Private Gardens**

Development involving the loss of gardens will not be permitted unless:

i. The proposal would represent a more efficient use of land at a location where higher densities are appropriate; or

ii. The development would result in a significant improvement to the urban design of an area; or

iii. The proposal is an extension to an existing single dwelling and would retain an adequate area of functional garden.

In all cases, any development of garden land should not result in harm to the character and appearance of an area.

Development involving front gardens should ensure that the character of the street is not harmed and that appropriate boundary treatments and planting are retained.
Local Area Character Appraisals
The City Council has recently carried out a number of Local Conservation Area Character Appraisals. It is worth highlighting that the majority mention centuries of growth and urban densification as a feature. In two examples reviewed, the loss of residential density in the post war era is identified as a negative feature – and one specifically encourages “the redevelopment of sites … that would increase residential density and preserve or enhance the character of the conservation area” (Bristol City Council, 2013, 47).

Neighbourhood Plans
Neighbourhood Planning was introduced in 2011 through the Localism Act. It enables local communities, through a neighbourhood forum, to create a plan for the area, which if agreed in a local referendum becomes part of the Local Plan. The Plan is developed by the neighbourhood forum, but in consultation with the LPA, who is responsible for approving the geographic scope of the plan. Neighbourhood Plans cannot prevent development, and must be completed with regard to the overall housing need, however they may shape where development takes place.

There are a number of neighbourhood plans currently being developed by neighbourhood partnerships in Bristol, although none have yet been adopted. One of the pilot plans – Lockleaze in North East Bristol – was developed as a typical low-density council housing estate of the inter and post-war periods: “The layout, housing design and construction methods used were a product of “garden suburb” and “modernist” thinking (Bristol City Design Group 2013b, 45). It is worth highlighting that draft plans involve increasing residential density in the neighbourhood, including the designation of 8 garage sites for development. Residents have, however, articulated concerns about increased densities:

“Future discussions around density of development should note that residents are sceptical and have voiced concern that higher densities may result in the loss of local characteristics they treasure like large back gardens and open green spaces. There is therefore the need for further debate that addresses people’s concerns. This should happen on a site-specific basis as development proposals come forward. Local people need to be involved to ensure their concerns are addressed in the planning and development processes (ibid, 60).

Bristol’s adjacent local authorities
Parts of the built up area of Bristol fall within the three neighbouring authorities of Bath and North East Somerset (BANES) to the East, North Somerset to the South and South Gloucestershire to the North. Appendix B provides a brief description of the policy environment towards soft densification in each of the three authorities. All of the authorities state the challenges of intensification of the urban fabric. Both BANES and South Gloucestershire acknowledge the potential for small plots to contribute to overall housing supply and put forward policies that are supportive of such development subject to the potential harm to residential character and amenity being mitigated. South Gloucestershire is specific about the potential of garden development, whereas as North Somerset seeks to protect the authority from ‘garden grabbing’.

37 Neighbourhood partnerships in Bristol are area based working groups between elected members from the council and local residents. Partnerships are given some financial support and autonomy by the local authority to spend, for example part of the transport budget is delegated to Neighbourhood Partnerships to support local traffic schemes.
Looking ahead: Future planning policy for Bristol in the emerging West of England Joint Spatial Plan

“Led by the mayor of Bristol, the city has recently embarked on a new approach to delivering homes that emphasises cross-boundary working. The challenge is a considerable one, but there is the capacity in and around Bristol to meet demand” (Carter 2014).

“The West of England authorities will prioritise and resource a joint process of assessing the implications of the SHMA outputs. This will provide an opportunity for each Council to work with the other West of England Unitary Authorities in identifying future needs and pursuing complementary strategies capable of delivering and supporting economic and social growth across the sub-region” (West of England Authorities, 2014, 1).

In February 2014, the four West of England authorities, agreed to the preparation of a Joint Strategic Planning Strategy (‘West of England Plan’) to 2036. Once adopted, this will provide a strategic framework within which the future core strategies of each authority should be set – comparable to the Mayor’s Plan in London. This will be a Statutory Development Plan Document, and is to be prepared alongside a ‘Future Transport Strategy’. It will identify housing requirements, include strategic locations, key sites and strategic infrastructure proposals and will be based on a joint evidence base, including a review of Green Belt land to meet objectively assessed housing need in the sub-region.

In November 2015 the four authorities published ‘issues and options for consultation’. It identifies a need for 85,000 new homes by 2036, nearly 30,000 more than the number already planned. This figure is derived from the Wider Bristol Housing Market Area SHMA completed in 2015 (see Opinion Research Services 2015), but some commentators estimate this figure to be considerably under what is really needed (see Barton Willmore 2015). It reiterates clearly the desire to continue to pursue the “central plank of our development strategy in recent years” (West of England, 2015, 4.1) to focus development on previously developed brownfield land: “the four authorities believe that the best places to meet the development needs of the future should be within our existing cities and towns” (ibid). It states clearly that the authorities will:

“Adopt a sequential approach to the identification of locations of growth that makes the best use of our existing brownfield sites and seeks to unlock more previously developed land” (ibid, Forward).

The consultation document sets out 4 different development scenarios for feedback:

- Scenario 1 - Protection of the Green Belt close to Bristol with development beyond (although it is acknowledged that this is unlikely to meet need arising);
- Scenario 2 - Urban concentration - testing the implications of focusing as much growth as possible within Bristol, including some green belt releases at Bristol;
- Scenario 3 - Transport related development;
- Scenario 4 - More even spread of development - Bristol and other towns; and
- Scenario 5 - Focus on a new settlement or a limited number of expanded settlements.
The four authorities are currently carrying out a study – to be published in early 2016 – as to the urban capacity of Bristol and Weston Super-Mare, which involves exploring opportunities for:

- the change of use of non-residential brownfield land to residential – where the previous use is no longer required or is not the most efficient use for the land;
- Identifying land which is currently underused and has potential for residential development;
- Increasing the density of development:
  - on allocated sites by reappraising and increasing their development potential; and
  - on existing sites where the opportunity for redevelopment arises.

The current consultation document does acknowledge some of the potential difficulties in continuing to pursue this strategy. Not only are questions around whether the strategy will yield enough land for development stated, but “is there a danger of harmful over development?” (ibid 4.3) with consequential impacts on infrastructure, schools, health facilities and open space. Despite this, with regard to the headline figure of 12,000 homes to be found within the urban areas of Bristol and Weston-Super-Mare to 2036, it is stated that: “The greater the proportion of housing which comes from development within existing urban areas, the smaller the need will be for development from other locations” (ibid 4.13). It is perhaps surprising that the headline figure of 12,000 has been publicly stated, prior to the completion of the urban capacity work currently underway.

**Policy Summary**
Bristol has developed a very strong policy position in favour of densification. There appear to have been two main policy drivers for this. The first is political advantage. The strength of opposition to green belt / green field development (the majority of which lies beyond Bristol’s administrative boundary within its neighbouring authorities) has historically been such that urban intensification has been the more politically acceptable option. However, the scale of Bristol’s current housing need is such that this is unlikely to remain the only option going forward. The second is the broader acceptance that increasing urban densities is more environmentally and socially sustainable in terms of critical mass to support service provision, particularly public transport.

Whilst there is no use of the term SD, support for this type of densification has been the corollary of the wider language of intensification / densification evident in Bristol’s planning policy framework, which looks set to continue in the future with the preparation of the West of England Joint Strategic Plan. The current policy environment supports garden development, the re-use of existing buildings, and the development of small sites in appropriate locations, subject to the protection of existing residential amenity and character. The policy in relation to sub-division appears to be more restrictive with the focus on refusal unless certain criteria can be met.

**d. Case study examples**
Walking and driving around Bristol reveals a city inundated with development. Cranes, development hoardings, and buildings under construction are commonplace. Almost without exception, every ward in Bristol could yield interesting and often multiple examples of SD over the last 15 years,
particularly for small in-fill developments involving change of use, but also for residential subdivision and garden development.

A long list of potential case studies was drawn up following a review of Bristol’s planning application database (using search terms relevant to soft-densification), discussion with interviewees to highlight particular schemes, and from site visits and local knowledge. The following 6 examples were selected to illustrate not only the different types of SD occurring in Bristol, but ‘typical’ of developments.

Although each case is unique, common themes across the planning officers’ reports appear: the principle of residential development in the given location (including assessment of loss of employment land where relevant), its massing, bulk and design, the impact of the proposal on residential amenity and parking provision.
### Table 13: Bristol Type 1 & Type 2: Residential sub-division and extension and re-configuration of existing properties

<table>
<thead>
<tr>
<th>Address</th>
<th>28 Radnor Road, Bristol BS7 8QY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ward</td>
<td>Bishopston</td>
</tr>
<tr>
<td>Developer</td>
<td>Not known</td>
</tr>
<tr>
<td>Application</td>
<td>Sub-division of an existing dwelling to create a total of 4 new units (3 one-bedroom flats and 1 two-bedroom duplex), and erection of a 2 story side extension.</td>
</tr>
<tr>
<td>Site Description</td>
<td>An end of terrace Victorian house with a vacant plot adjacent.</td>
</tr>
</tbody>
</table>
| Objections lodged        | A number of objections were lodged to the proposal, from neighbours and from the Bishopston Society\(^38\) which included:  
  - Concern about the quality of the living accommodation and lack of outside space for residents;  
  - Preference for the site to remain a family houses – housing in multiple occupation considered to be proliferating in the area; and  
  - Concern about impact on amenity of existing residents affected by parking problems, waste management, noise and transient tenants. |
| Brief planning summary   | A previous scheme involving 5 flats was refused on the basis of ‘over-development’, out of character with the surrounding form. The 5 flats proposed were considered to offer a poor living environment to future occupiers.  
This further scheme is considered more acceptable in design terms and in terms of the quality of the living environment proposed. Whilst the council acknowledged that a number of flatted developments have occurred in the area recently, that 78% of the overall housing stock in Bishopston remains single dwelling, was sufficient justification for development for flats as a contribution to the mix of the area. Transience of tenants was noted as not being a planning issue. |
| Approval Date            | February 2015                    |
| Relevant interviewee comments on the scheme | N/A |
| Other relevant information / site observations. | An application has recently been approved for a new detached dwelling on the land immediately adjacent 28 Radnor Road shown on figure 30.  
The dwelling being converted has clearly been vacant for some time. On-street parking provision appears very constrained. |

\(^{38}\) The Bishopston Society, created in 2002, is a public membership organization with the purpose of promoting high standards in architecture and planning in the Bishopston area of Bristol. More information may be found here: [http://www.bishopstonsociety.org.uk](http://www.bishopstonsociety.org.uk)
Fig. 31: Aerial photo of 28 Radnor Road

Fig. 32 & 33: 28 Radnor Road, Under development, existing 1 story side, extension removed

Source: Hannah Hickman
### Table 13: Bristol Type 3: Garden in-fill, Example A

<table>
<thead>
<tr>
<th>Address</th>
<th>1 Tyne Road, Bristol, BS7 8EE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ward</td>
<td>Redland</td>
</tr>
<tr>
<td>Developer</td>
<td>Private resident</td>
</tr>
<tr>
<td>Application</td>
<td>Erection of a single new dwelling to the rear of the existing semi-detached property.</td>
</tr>
<tr>
<td>Site Description</td>
<td>The property has a small front garden and larger rear garden, with a former electricity sub-station and a number of lock up garages to the rear.</td>
</tr>
<tr>
<td>Objections lodged</td>
<td>Neighbours made comments that included: ● The building would be out of keeping with the character of the surrounding area; ● There is insufficient land to build a house in the grounds of an existing property; ● If granted the proposal would set a precedent for similar development; and ● The proposed house would put further pressure on existing public services and infrastructure.</td>
</tr>
<tr>
<td>Planning summary</td>
<td>A previous application on 1 Tyne Road was withdrawn by the applicant on the advice of the planning officer over concerns about the proposed scale and design of the development. The revised scheme was approved as being more sympathetic in scale to its surroundings. In addition, a smaller house introduced into an area of large family houses was considered a good contribution to diversifying the housing mix in the area. Comments from a designer officer on the proposal included: “I think this is quite a successful way of fitting a small house on to a confined plot and keeping it subservient to other houses in the vicinity”.</td>
</tr>
<tr>
<td>Approval Date</td>
<td>August 2013</td>
</tr>
<tr>
<td>Relevant interviewee comments on the scheme</td>
<td>“The planners didn’t like the original scheme. Their main objection was around relationship to the existing urban fabric. There was no flexibility – they approached the context constraints very literally.”</td>
</tr>
<tr>
<td>Other relevant information / site observations</td>
<td>A subsequent application for a dwelling in the garden to the rear of 3 Tyne Road, the adjoining semi-detached property, has also recently also been approved. In relation to 3 Tyne Road, the local civic society commented: “The back gardens of properties along this part of Tyne Road have remained largely unchanged since the houses were built in the 1840s. At a time when Bristol is trumpeting its green credentials, it would be a shame to lose gardens that help to create a thriving habitat for wildlife to be built on. There are many bird species that live in the gardens on Tyne Road, as well as regular visits from foxes and other animals. The character of the neighbourhood would change dramatically if local residents started building houses on their back gardens, and the sense of space would be lost. There would also be a potential loss of privacy for people in their gardens, as the new house would overlook other people’s properties. There is also the fact that the proposed building would not be in keeping with the largely Victorian properties it would be surrounded by.”</td>
</tr>
</tbody>
</table>
Fig. 34 Aerial photo of 1 Tyne Road

Fig. 35. 1 Tyne Road Under construction

Fig 36. 1 Tyne Road, construction

Source: Hannah Hickman

Fig. 37. 1 Tyne Road, Front

Source: Hannah Hickman
**Table 14: Bristol Type 3: Garden in-fill, Example B**

<table>
<thead>
<tr>
<th>Address</th>
<th>Eldon Terrace, Bristol, BS3 4NZ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ward</td>
<td>Windmill Hill</td>
</tr>
<tr>
<td>Developer</td>
<td>Various</td>
</tr>
<tr>
<td>Application</td>
<td>Several applications, some built out, some approved and some currently live, involving the development of single dwellings and town houses in rear gardens.</td>
</tr>
<tr>
<td>Site Description</td>
<td>A series of rear gardens to Nos. 1-32 Eldon Terrace that slope steeply down onto Cotswold Road to the west.</td>
</tr>
<tr>
<td>Objections lodged</td>
<td>Different schemes have received various objections over the years, principally from neighbouring residents, that have primarily focussed on design and impact on residential amenity and character, rather than the principle of housing development in the area. One objection to the most recent application was lodged concerning developments in these gardens being developed in a ‘hotch-patch’ manner rather than comprehensively [see planning summary below].</td>
</tr>
<tr>
<td>Planning summary</td>
<td>The planning justification for allowing development in these gardens has been made a number of times – primarily at a time when gardens were designated ‘brownfield land’. However, the principle of developing these gardens appears to remain, justified in the main due to the existing developments that have occurred and proximity of the site(s) to a train station. About the most recent application, to the rear of 28-30 Eldon Terrace, the planning officer judged the site’s location close to a train station and in walking distance to a shopping centre, to be acceptable: “The proposal would also contribute to windfall housing required within the plan period as set out under Policy BCS5 and housing within south Bristol as set out under Policy BCS1. The site is located within a residential area and remains in residential use. The site has no designation and is of limited public amenity value as an undesignated private residential garden” (Bristol City Council Development Control Committee 2015, 5). The main issues with the most recent application appears to be continuity and coherence in relation to similar schemes that have come forward adjacent to the site: “While it appears likely that development may come forward across other rear gardens in future, these are not allocated for development and no other consents or live permissions are in place than those set out above. Minimal weight can therefore be applied to this scenario of future development despite this appearing somewhat likely. It is also noted that an objection comment has been received with regard to the incremental development along this frontage – unfortunately there is no specific allocation for this site within the Site Allocations and Development Management Document (2014) and as such, due to issues of managing land acquisition from the different owners, the sites are likely to come forward for development in a piecemeal fashion” (ibid, 6).</td>
</tr>
<tr>
<td>Approval Date</td>
<td>Various</td>
</tr>
<tr>
<td>Relevant interviewee comments on the scheme</td>
<td>N/A</td>
</tr>
<tr>
<td>Other relevant information / Site</td>
<td>The series of rear gardens to Eldon Terrace fronting onto Cotswold Road North have had a large number of applications for development since 2001.</td>
</tr>
</tbody>
</table>
In a piecemeal fashion these rear garden developments are resulting in an emerging street frontage to Cotswold Road North. The photographs below show contemporary town houses, mixed in with garages and rear garden gates. One houses is stepped steeply, as a particular response to the site, whereas the adjacent town houses are cut out of the hill. The most recent application at 28-30 Eldon Terrace is not yet built out, and will offer another, varying response to the site.

Fig. 38 Aerial photo of Eldon Terrace

Fig. 39. Eldon Terrace    Fig. 40. Rear gardens of Eldon Terrace

Source: Hannah Hickman   Source: Hannah Hickman
Fig. 41. Completed ‘rear’ garden schemes

Fig. 42. Rear garages of Eldon Terrace

Fig. 43 & 44. Single dwelling scheme ‘sandwiched’ between two rear gardens (1&2/3)
Source: Hannah Hickman

Fig 45. A single dwelling scheme ‘sandwiched’ between two rear gardens (3/3)

Source: Hannah Hickman
**Table 15. Bristol Type 4 - Division of House plots and replacement of a large dwelling in with a cul-de-sac providing smaller high-status houses**

<table>
<thead>
<tr>
<th>Address</th>
<th>14 &amp; 16 Beloe Road, Bristol, BS7 8RB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ward</td>
<td>Bishopston</td>
</tr>
<tr>
<td>Developer</td>
<td>Griffon Homes</td>
</tr>
</tbody>
</table>

**Application**

Conversion of 16 Beloe Road (formerly 14 & 16 Beloe Road) back to form a pair of semi-detached houses (as existing approval) and construction of two pairs of semi-detached, 2.5 storey, 3-bed houses (total of four new houses) with associated gardens, access and parking off existing private access road.

**Site Description**

The site comprised a pair of semi-detached houses that have been previously amalgamated into one large dwelling. The curtilage of the house comprises a large triangular plot with a modest front garden and large rear garden.

**Objections lodged**

48 objections were received from neighbours and from the Bishopston Society, particularly concerned that the development would:

- set a precedent
- be unacceptable loss of green space or "garden grabbing"
- result in over-intensive and undesirable development
- gardens proposed are too small;
- be out of keeping with the character of the surrounding area.

**Planning summary**

The principle of the development was considered acceptable in planning terms, particularly its sustainable location in close proximity to a shopping street. Despite the site at the point of application being a private residential garden, its historic use as tennis courts was considered sufficient to justify its use as previously developed.

It was refused on the grounds of concerns about access arrangements and vehicular and pedestrian safety.

**Approval Date**

Approved at appeal in 2014.

**Relevant interviewee comments on the scheme**

"It's a perfect example of tapping 4 units into an already busy street. It's a nice little scheme, but I cannot comment on affordability – it's quite expensive."

**Other relevant information**

The development site was advertised on ‘rightmove’ in 2014 for £1,000,000. Each of the units is recorded as having been sold for £339,950.

**Site observations**

A lot of hard standing has gone in to allow access and turning arrangements for vehicles. Units 1,2,3 and 4 are advertised as 3 bedroom family houses. They are demonstrably ‘small’ and are very ‘discretely’ hidden by 14 and 16 Beloe to the front.
Fig. 46. Aerial photo of Beloe Road.

Source: Hannah Hickman

Fig. 47. 14-16 Beloe Road (1/2)  Fig. 48. 1 & 2 Beloe Mews (2/2)

Source: Hannah Hickman

Fig. 49. 3&4 Beloe Mews, Source: Hannah Hickman
<table>
<thead>
<tr>
<th>Table 16: Bristol Type 5: Infill Development on Vacant or Undeveloped Plots</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Address</strong></td>
</tr>
<tr>
<td><strong>Ward</strong></td>
</tr>
<tr>
<td><strong>Developer</strong></td>
</tr>
<tr>
<td><strong>Application</strong></td>
</tr>
<tr>
<td><strong>Site Description</strong></td>
</tr>
<tr>
<td><strong>Objections lodged</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>Planning summary</strong></td>
</tr>
<tr>
<td><strong>Approval Date</strong></td>
</tr>
<tr>
<td><strong>Relevant interviewee comments on the scheme</strong></td>
</tr>
<tr>
<td><strong>Other relevant information / site observations</strong></td>
</tr>
</tbody>
</table>
Fig 50. Aerial photo of Morley Road

Fig. 51. “The Edge”, Morley Road

Source: Hannah Hickman
**Table 17: Bristol Type 6: Change of use, subdivision of non-residential buildings for residential purposes**

<table>
<thead>
<tr>
<th>Address</th>
<th>St Lukes Hall, William Street, BS3 4BW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ward</td>
<td>Bedminster</td>
</tr>
<tr>
<td>Developer</td>
<td>Helm developments</td>
</tr>
<tr>
<td>Application</td>
<td>Proposed change of use from Class B1(c) light industrial to residential by the refurbishment, conversion and extension of St Lukes Hall, to include, 3 no 1-bedroom and 11 no 2-bedroom apartments with parking for 7 vehicles and 14 cycle stores. The proposal involved the demolition of the existing extension to the south of the building, and the erection of a new four storey extension to the south and the west of the building.</td>
</tr>
<tr>
<td>Site Description</td>
<td>A site is occupied by a large landmark Victorian building originally built as a soup kitchen and poor house. Its previous active use appears to be unknown, but it's designation at the time of application was as light industrial. The site is within an area of mixed character with residential, employment land and storage adjacent. At the point of application it was allocated as a primarily industrial and warehousing area.</td>
</tr>
<tr>
<td>Objections lodged</td>
<td>1 objection and 6 letters of support were received from neighbouring properties. Those in favour were keen to see a derelict building brought back into use that had been attracting anti-social behaviour. The proposals were also seen as sympathetic to the original building. Concerns were expressed about over-development (too many flats) and parking provision.</td>
</tr>
<tr>
<td>Planning summary</td>
<td>Loss of employment site justified: continuous marketing since 2012 has not yielded any response. Proposals to bring the building back into use following dereliction were welcomed: the Local Conservation Area appraisal had identified the building as an unlisted building of merit.</td>
</tr>
<tr>
<td>Approval Date</td>
<td>February 2014</td>
</tr>
</tbody>
</table>
| Relevant interviewee comments on the scheme | “*It’s a substantial building that’s been empty for 10 years, it’s rotting, got ingress, being used as a squat… It’s sad, it should be something rather than nothing. I believe the 14 luxury flats proposed have had nothing but support.*”  
“*Why all these flats, where are the houses?*” |
| Other relevant information / site observations | Within the wider area, there are a number of forthcoming proposals for hard densification to assist the regeneration of the area following industrial decline in that part of Bristol. These have been met with controversy, by virtue of their scale and scepticism over their contribution towards affordable housing in the city.  
The development sits within a very mixed area in terms of land use. It is not overwhelmingly residential in character. Nearby residents are in flats – potentially more transient – and this reflects the relatively few responses to the application. |
Fig 52. Aerial photo of St Lukes Hall

Fig. 53. St Lukes Hall

Copyright: Bristol, 24/7
e. Core issues pertaining to soft densification

This section complements the quantitative analysis presented for the period 2001-2011, by:

- reviewing the latest data collated by Bristol City Council in their 2015 Residential Survey;
- reporting the findings of several site visits in and around Bristol for visual signs of densification and morphological change, and evidence of pressures on the urban fabric, including in relation to transport, residential amenity, character, etc.; and
- presenting the feedback of 12 in-depth interviews carried out with a range of experts involved in soft-densification including planning officers, politicians, residents groups, local building firms, development agents and architects. These interviews focused on perceptions of the drivers of soft densification and de-densification, the level of policy support for development, the most prevalent types of densification and their perceived impact.

Overview of the latest data from Bristol City Council

“We appear to talk about nothing else other than densification these days.”

All interviewees were categorical about SD being characteristic of Bristol’s current development pattern. Extensive site visits revealed schemes in many neighbourhoods, and all participants could name recent developments of most types of SD.

Bristol City Council’s annual Residential Development Survey (Bristol City Council 2015b) tracks progress on delivery against policies in its core strategy. The survey is carried out to help Bristol City Council monitor how effectively its policies contained within the local plan are being delivered. It is also a national requirement that each LPA publish an annual monitoring report as to how implementation of policies in the Local Plan is progressing, and the residential development survey is a key contribution to this.

The latest report covers the 12 months to 31 March 2015. It shows a continuation of the densification trend reported in section 2 of this case study. Whilst ‘hard densification’ on sites of 10 or more dwellings remains the most prevalent form of development, data shows that small sites and conversions have continued to contribute to Bristol’s increasing housing stock.

Of the 16,347 dwellings delivered since 2006, the average density of housing completed on major sites is 98.1 dwellings per hectare. 88% of all completions have exceeded the minimum indicative net density of 50dph as set out in BCS20 of the Core Strategy (see the box above on BCS20). 92.8% of the dwellings completed over this period took place on previously-developed land. Bristol has been a densifying city.

This total figure is disaggregated by site / development type, defined as follows:

- Large sites – developments of 10 or more dwellings.
- Small sites – developments of 1 to 9 dwellings\textsuperscript{39}.

- Other dwellings – includes student/keyworker cluster flats, granny annexes, houses in multiple occupation (HMO).

- Conversion of existing dwellings leading to a net gain.

Figure 53 shows that whilst the majority of completions were on large sites, an annual average of 348 units a year has been delivered on small sites, and a total of 1,910 (at an average of 212 units a year) have resulted from the sub-division or amalgamation of existing dwellings, amounting to 11.7\% of the net additional housing achieved over this period. Whereas delivery on small sites is reasonably consistent, the rate of sub-division (or conversion) appears to have dropped markedly from nearly 500 a year between 2006-9 period to between 50-70 units a year over the last 3 years. One interviewee suggested that the number of sub-divisions may have dropped due to changes in building regulations and residential accommodation standards, resulting in lower financial incentives. However, based on permissions for sub-division, the average for the 2015-16 period is set to increase.

\textbf{Fig. 54. Dwelling completions in Bristol since 2006}

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{dwelling_completions.png}
\caption{Dwelling completions since 2006}
\end{figure}

\textit{Source: Bristol City Council (2015b)}

Residential sub-division (conversion) is reported as having been high in areas that already have a large number of sub-divisions – for example Clifton, Cotham, and the Cabot areas – argued to reflect the physical suitability for sub-division of the housing stock in these areas – including large

\textsuperscript{39} Local authorities in England may define differently what constitutes a small or a large site. In practice, most local authorities define small sites as up to 15 dwellings. Bristol appears more unusual in defining small sites at the lower end of the scale.
Edwardian and Victorian houses. The survey highlights the potential for increasing the number of sub-divisions in parts of the city where relatively few properties have been sub-divided.

Bristol City Council has also recorded the number of gross completions on private residential garden land over the last 10 years, which are defined as including coach houses, extensions, and garages if they fall within the residential curtilage. During the 2014/15 period this amounted to 100 dwellings – almost a quarter of small site completions. Emphasis in the report is given to the fact that “as a proportion of the overall total gross completions in Bristol, this is still relatively low, totalling 5% over the 10 years” (2015b, 3.3). Bristol City Council may have wished to downplay the contribution of garden development to housing supply because of the change in national planning policy in 2010 Under the previous Labour Government the inclusion of garden land in the definition of brownfield land had provided a permissive policy backdrop for development in residential gardens. Whereas the new national planning policy removed garden land from this definition and asked LPAs to consider setting out policies to resist inappropriate development of residential gardens.

**Fig. 55. Dwellings delivered on private residential garden land**

<table>
<thead>
<tr>
<th>Year</th>
<th>Dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005 - 2006</td>
<td>70</td>
</tr>
<tr>
<td>2006 - 2007</td>
<td>80</td>
</tr>
<tr>
<td>2007 - 2008</td>
<td>90</td>
</tr>
<tr>
<td>2008 - 2009</td>
<td>100</td>
</tr>
<tr>
<td>2009 - 2010</td>
<td>110</td>
</tr>
<tr>
<td>2010 - 2011</td>
<td>120</td>
</tr>
<tr>
<td>2011 - 2012</td>
<td>130</td>
</tr>
<tr>
<td>2012 - 2013</td>
<td>140</td>
</tr>
<tr>
<td>2013 - 2014</td>
<td>150</td>
</tr>
<tr>
<td>2014 - 2015</td>
<td>160</td>
</tr>
</tbody>
</table>

Source: Bristol City Council (2015b)

**Drivers of soft-densification**

“If there is money to be made – it will happen. That’s the fundamental driver for these kinds of development in Bristol.”

“The lack of property available in affluent / trendy areas means they are under pressure, people will try their hand at any scheme.”
Perception of the drivers of SD in Bristol are clearly multifarious – and often very scheme specific – but planning constraints and market forces were the most cited. Interviewees consistently mentioned Bristol's history of planning constraint at the urban fringe as driving densification within the urban core. The positive policy environment towards densification was seen as the corollary of planning constraint:

“Bristol is being politically driven to deliver as much as they can within the urban fabric, to protect the green and pleasant land”.

“Our current Mayor is positive about in-fill development, using little urban sites for anything from pop-up gardens to in-fill town houses”

“There is less land to buy – a great shortage even. This lack of opportunity has resulted in people looking at existing properties to maximise their value”.

“We have taken to minimise the amount of green land take”.

Economic drivers of densification are at both the macro and micro scale. At the macro level, interviewees were consistent in seeing a simple correlation between high housing demand in Bristol and a lack of supply in driving demand for SD. Strong demand was generally perceived to be “across the board and for all housing types and tenures” rather than noticeably spatial variegated, with the exception of a limited number of low density low value suburban wards.

Some asserted that Bristol had historically “withheld supply” through planning constraints and with an insufficient number of viable planning consents currently, “where money is to be made, developers will push on any scheme” whether on a large or small site. One residents’ association representative noted: “I assume developers know their business, if the demand is there for such schemes, they’ll go for it”, “it’s easy where the market is strong”.

Several interviewees highlighted the most recent – post recession – house price trends in Bristol as producing a particular demand effect, especially in relation to small in-fill schemes involving change of use of pre-existing buildings or re-development. These were seen as having been particularly “risky”, “unviable” and “vulnerable” during the recession years, “costing significantly more than new build on greenfield land” but for which viability had recently returned.

At the more micro level, it is clear that people perceive the smallest developments – particular ‘garden’ schemes and residential sub-division involving the residential conversion of a single dwelling into two flats – to be driven by the financial motivation of individuals. Of a back garden scheme, one owner reported: “there was substantial financial gain for me personally because of the land value”, and an architect that: “our client base is economically driven”.

Linked to this was the suggestion that the lack of appreciation value in pensions is fuelling demand for the smallest SD schemes, with people looking to maximise the financial gain from other assets:
“Lots of people are interested in residential development that might not have been previously. Pensions have not performed as well as hoped. I personally know a lot of people who are investing in buy-to-let, or seeking to maximise the financial value of their own property through sub-division or extension, to make money.”

One of the social impacts of rising rental and house prices levels in Bristol is the perception of a change in aspiration in terms of living and space standards. Several interviewees spoke of a rising demand for smaller residential units – “modern rabbit hutches” – not only amongst first time buyers but also within the private rented sector. Interviewees also spoke of parents seeking to ‘solve’ the affordability crisis for their children, by altering or expanding their existing dwellings to enable children to live independently whilst unable to access the housing ladder:

“buyers are prepared to accept less than they would have done previously because of the affordability challenge.”

“Previously no-one wanted to live in a 700sq feet garage space, but now people will accept that”.

“Personally I know a lot of people who are building granny annexes and accommodation in their garages for their 22/23/24 year olds. They know when they come to sell, this will add value, and solves a problem for their children, currently priced out of the property market”

The market for residential sub-division was thought to be driven largely by the rental market:

“these developers are not home owners, they are being developed for the rental market. Often developers are buying something in not a great state and maximising their return on it”.

A significant demand for sub-division has resulted from the rise in the student population in Bristol over the last decade (currently estimated to be 10% of Bristol’s population, see Bristol City Council 2015a). Demand for student flats has spread outwards from the wards traditionally associated with student accommodation as rents have risen prohibitively high. Several noted “intense” political pressure to “resist studentification” through sub-division.

Finally, some spoke of the existing morphological character of Bristol as being a driver of SD. It is perceived as a city that lends itself to SD: “its historic urban fabric is very dense… it’s an appropriate scale of development here”. Cities built at a lower density may feel more challenged by SD. But also it’s about momentum / a cultural shift which in itself acts as a driver:

“30 years ago there was no new build market in Bristol. Development that has taken place over the last 15 years within the city – particularly the prominent developments within the city centre – is a reasonably new phenomenon that has become desirable and acceptable”

There are some really exciting examples of what can be achieved on certain plots, which “sets a precedent for what might be achieved”.
Developers of soft densification
There was broad consensus amongst interviewees that developers of SD were comprised of two groups. The first consists of individuals, either single builders or sole property owners, motivated by individual financial gain to maximise the value of their own properties / or single plot acquisitions.

“These are not developers: these are intelligent people, who understand what a house is worth. What return they can get. Housing is currently seen as the smart way to make capital”.

“These are people are looking to exploit their existing assets to make money.”

“These are one-off entrepreneurs”.

“Individuals who have had a career change perhaps and have some cash to put in it.”

An architect spoke of an increasing number of clients being private individuals aware of the potential to make returns by utilising space differently or by developing ancillary buildings – particularly garages. This first group also includes those described earlier motivated to solve affordability problems close to home, by developing ancillary buildings for children/older parents.

The second group was described as being made up of small to medium sized enterprises: smaller developers repeatedly called “niche guys”:

“These are the developers you’ve never heard of. They may have lost lots of money in the past and rebrand themselves every couple of years. Try and find out more about them and you often can’t – there’s nothing beyond the first page of their website”.

The availability of cash / ability to access credit was considered key to the size of an organisation: “the average Jo can put up 1 house, but stretch it to a £1 million cost build scheme, and you’ve got to have a reputation in order for a lender to lend”.

Several interviewees considered the market for the smaller developer “developing up to 10 units” to be coming back strongly, after a number having had “their fingers burnt in 2007”: “I personally know people who lost a lot of money in 2007, and through personal guarantees lost their own properties. They are coming back into the market now”.

Whilst some interviewees perceived these developers to be ‘aspirant’, “one man bands or groups of people aspiring to be larger developers or landlords, taking the opportunity”, others felt that most of these developers are “happy with the number of units they are developing and don’t want to employ any more people”.

One “garden-grabbing” scheme in Bristol receiving a number of press headlines\(^{40}\) (see Salkeld, 2009) developed in 2011 by the well-known housebuilder Lindon Homes, was seen unanimously as a one-off for a firm of that size.

**Planning control and the impacts of soft-densification**

Opinion was extremely mixed about the relationship between SD and the planning system in Bristol, particularly about the ability of planning to mitigate sufficiently the potentially negative outcomes of soft-densification. Five themes stood out in particular.

Firstly, there was a perception that Bristol’s policy stance towards SD is generally “pretty proactive and positive” because “we are under such pressure” to increase housing stock. Whilst one person commented that the removal of garden land from the designation of brownfield land with the new NPPF in 2011 had restricted garden development. “For a while it was nearly impossible” to get permission in back gardens, generally people felt that “recently it was becoming easier again”, and that whilst Bristol “leans towards a restrictive approach, reflecting government policy, it’s not absolutely restrictive”.

Secondly, whilst accepting Bristol’s general policy stance towards SD, lower-density residential areas were seen as the exception. They were viewed as being protected by planning policy from densification because of their existing morphology and their often greater distance from transport hubs and centres. Despite some interviewees being able to provide examples – particularly of back garden development in high value, low density area – Bristol’s planning application database reveals recent applications in Stoke Bishop and Sneyd Park that have been declined on the basis of harm to the character and appearance of the area as specified in policy DM21 on garden development. One policy officer commented, “Are we challenging that, do we know how much we could get on some of these sites? We are under such pressure, I’m less bothered about Conservation Area stuff”. The further densification of already dense neighbourhoods appears to be more justifiable in planning terms as being consistent with the prevailing pattern of development: “the harmful effects are perhaps more keenly felt in the leafy areas as compared to the more dense more accessible”.

Thirdly, when considered in isolation and on its own merits, each SD scheme has a relatively small impact in terms of service provision and parking and so on. But many interviewees described planning policy and the decision making process as being unable to address the cumulative impacts of soft-densification: “it’s as if each scheme has no impact other than of itself, but I would expect the council to look at the cumulative impact, but it appears impotent”. A fact acknowledged by one policy officer, “It’s difficult to evidence impact … I think that’s a fair criticism” and another that “we don’t have many schemes large enough to generate services in and of their own right, so in a sense all of Bristol’s provision is difficult to plan for in service terms”. Two interviewees talked about wanting to identify a ‘tipping point’ – the point at which communities could be described as ‘full up’, although one was categorical that their neighbourhood was “already full”.

Fourthly, and following on from the second point is that some interviewees consistently felt that the planning process was insufficiently aligned to other parts of the council’s activities relating to service

\(^{40}\) See: http://www.thisismoney.co.uk/money/mortgageshome/article-1671775/The-garden-grab-that-made-a-street-25m.html
planning, particularly school places and transport provision, and were frustrated that they did not perceive sufficient integration. One interviewee described writing to the Mayor to ask for “reassurance that everything is under control” and evidence that “impact is being assessed and planned for.” One policy officer noted, “we do try and work with education and health where we can, but they tend to be short term, more reactive rather than proactive.”

Fifthly, some interviewees bemoaned what they perceived to be inconsistency in decision making. Whilst it was acknowledged as a principle in planning law that each scheme be considered on its own merits, some interviewees felt that some parameters, particularly relating to design and urban form, were applied much more rigorously in some wards than others: “there appear to be very high expectations of design and form in relation to in-fill schemes but I’m not convinced this is being applied consistently, which is basically unfair.”

Finally, whilst the policy environment was considered in principle to be positive, in practice people’s general experiences of getting consent was described as “quite difficult” and the “council can be quite obstructive”. Development agents and architects referred to the frequent “game of poker” played with the Council whereby an application would be submitted at a certain density which would “inevitably” be negotiated down to something considered moderately less intensive (and therefore more acceptable to adjacent residents) as compared to the original scheme. One policy officer acknowledged this trend but suggested that given the challenge ahead of seeking 10,000 dwellings within the urban fabric over the next 20 years, any negotiations involved reductions in density “would need to stop … policy may need to be more accepting of higher densities in smaller schemes.”

**Outcomes of soft-densification**

Opinions on the outcomes of SD are extremely mixed and often vary according to the specifics of a scheme and the community in which a development is situated. The perceived outcomes of densification are grouped and commented on below.

**Housing supply and affordability**

There was almost unanimous agreement that, despite the relatively small number of units delivered through SD as compared to large development sites, SD had delivered nearly 7,000 units since 2006. This was nevertheless a substantial amount in the context of Bristol’s overall supply needs, and a clear indication of a positive policy environment towards SD: “it’s great – we’ve got housing targets to meet”. This amount of development within the urban area has clearly provided some protection to greenfield/greenbelt land, but the scale of future challenges noted in sections 1 and 2 above is unlikely to be met by urban containment alone. Given the continuing rise of house prices in Bristol, it is difficult to conclude that SD has had a meaningful impact on house prices, albeit that it has contributed to supply.

Soft-densification has not made any meaningful contribution to the provision of affordable housing in the city unless, as in a very small number of recent cases, the development is carried out directly by a RSL, such as a Housing Association. Until recently, developments of 15 or fewer units were not required to contribute towards the provision of affordable housing, either on the development site
or a ‘commuted payment’ (financial contribution) towards provision elsewhere in the LPA. Bristol’s planning application database records a notable number of applications for developments of 14 units. Interviewees were unsurprised at this fact, and commented that “very frequently” and “all the time” developers will suppress numbers on a site to avoid affordable housing payments: “developers are building fewer larger, more expensive units whereas the market need is for more, cheaper smaller units.” The outcome of the affordability threshold is that some smaller sites are being developed at a lower density than market demand and potential site capacity.

Policy in relation to affordable housing provision changed with the publication of Bristol’s ‘Site Allocations and Development Management Policies Local Plan’ (2014), requiring on-site or equivalent financial contributions (of 10–20% depending on location) for developments of between 10–14 units, subject to the scheme viability not being affected. One interviewee comment that, “Bristol just rolls over and accepts the viability arguments” and “will not push on viability”.

**Architectural quality and urban form**

One interviewee spoke of the particular place in the market for high value new build schemes of 8–10 units, “because they feel more individual and less of a number”. Contemporary new build town houses are now both acceptable and desirable – a market that was not thought by some to have existed 15 years ago.

That the market was currently there for these small sites was thought to be critical for encouraging contemporary architecture in Bristol: “I think the opportunity to showcase contemporary architecture is more important than contributing say 6 houses to the housing supply”. Several interviewees felt that smaller scale developments on “tricky urban sites” posed particular challenges that encouraged “modern designers to be more inventive, resulting in more interesting architecture”. Although design outcomes are subjective, site visits have revealed numerous in-fill schemes displaying interesting materials, colours, and contemporary design that both challenge and complement the vernacular architecture of the area.

However, it is also important to note that some commented that schemes were often “compromised” by “overly restrictive” guidelines on urban form, character and design, and some spoke negatively of soft-densification, “some smaller applications are really not that great”. One commented about a scheme completed during the property boom of the early 1990s: “We did some really grubby, nasty silly schemes in Patchway and Filton – low budget conversions promoted by DIY television programmes – jumping on the bandwagon to make money, these were really just garages with two windows”. Others spoke of “nasty garage conversions with barely two windows.”

**Bringing derelict sites back into use versus employment and loss**

Some interviewees suggested the reaction to development by communities to be predominantly dependent on the pre-existing use, with the potential for small schemes involving derelict or underused sites to be brought back into use being perceived more positively than others. One interviewee noted that the Morley Road scheme highlighted in section 4 had enabled surveillance of a local park, and a reduction in reported after-dark crimes. Another interviewee reported a scheme involving the redevelopment of two garages for houses to be “so much better”, “having previously been a magnet for gangs. I’m delighted there’ll be two families living there now”.
On the other hand, many of the SD schemes involving change of use result in a loss of employment land. BCC’s policy position is clear that employment land should be protected where viable: “In principle there is a concern, we are challenged by it and we are not delivering our employment land targets. But lots of these sites are trapped back land sites which were useful back in the day but have been vacant. It’s better to have them in productive use”. Interviewees spoke of the case for justifying the loss of employment space in the face of meeting Bristol’s housing need and of the case of justifying the lack of viability for future employment use: “We just quietly advertise, and lack of appetite seems to be sufficient.”

**Support for local shops, services and transport**

“The theory is of course that there ought to be a strong correlation between density and sustainability. The super-dense places are much better able to support public transport services”.

Several interviewees spoke of the benefit of SD in increasing support for local services and businesses, “services will be better used”. One area of Bristol – Southville – experiencing a high rate of SD across all types, has seen its local centre transformed dramatically over the last decade, leading some to comment (neither positively nor negatively) on a perceived link between “densification and gentrification”. For local business and shops soft-densification is positive, and the BS3 business group in which Southville falls, writes frequently in support of development.

However, one interviewee observed: “I’m not sure if densification is better for an area or just neutral. In theory development should accrue benefits to an area – it should lead to more activity, spending and a critical mass that enables things to happen, but I’m not sure …” Many interviewees accepted that increased residential densification is putting pressure on other services (transport, school provision, health care, etc), whilst the space for these activities – including community activities – to take place in or expand diminishes because places either become more expensive or less available – both a direct result of SD: “public services are impacted badly by densification.”

This was coupled with a generalised view of a lack of strategic planning to enable service provision to be planned in tandem with development that was leading to some communities considering themselves to be “overloaded”. Bristol’s recent crisis in the provision of primary school places in many parts of the city (see South Bristol Schools Campaign) – highly correlated with places experiencing SD – was thought to have a particularly direct impact on communities’ perceptions of the benefits of development (see below). Strategic service planning needs to be “better joined up” rather than the council appearing “surprised by the shortage of school place provision” (see also section 5.4 above).

**Community perceptions of soft-densification**

Whilst all but the residents associations were generally positive about the impact of SD, “personally I think it’s great”, it is clear that the interviewees believed communities to have very mixed opinions about the impact of SD on residential amenity and character. Whilst they acknowledged the strong emphasis in Bristol’s policies on the protection of residential character and amenity, they were not always convinced that these were always upheld. Three particular themes emerged from the interviews and the planning committee reports.
The first is the perception that residents in lower density, high value areas, are more likely to be negative about SD in general, and garden development in particular. Interviewees spoke of communities perceiving themselves to be “under threat” from densification, concerned about the impact of SD on morphological character in particular, but also about precedent, “every garden application is a perceived crisis”. One interviewee highlighted the story of residents in row of owner-occupied houses in the Redland area of Bristol (an area that has experienced a high rate of residential sub-division and some garden development), who have taken the step of agreeing a legal covenant\(^{41}\) restricting owners (current and future) from back-garden development. Reflective of this concern about garden development is the observation from one councillor that: “you would have thought that it would be the big applications that were the most tricky at committee, but the tricky ones are garden developments in Stoke Bishop.” Interviewees spoke of people opposing back garden development either because people want to “preserve their lovely part of Bristol” or because of “jealousy ‘… the neighbours are going to make a fortune’, whereas I think, why not, let them if it’s meeting a need?”

The second is that in all areas, residential sub-division seems to meet with more resistance than other forms of SD. This appears to reflect the increased likelihood of sub-division leading to rental properties, student accommodation, and therefore a more transient community, less focused on contributing to the local area, to care for the local environment etc. “We seem to have a proliferation of flats, I would far prefer family housing”. Planning committee reports repeatedly emphasise that transience is not a planning matter, and that flats – in the right locations – contribute to ensuring a mix of supply. Bishopston – a ward that has experienced a substantial amount of sub-division is reported to be campaigning to “reclaim” the neighbourhood “as a family place.”

The third is about the perception versus the reality of impact for communities. It was observed that proposals for SD are often met with scepticism, right up until the point of completion, and then opinions can shift quite markedly, particularly if a scheme is perceived as visually more appealing than the original – often derelict – building:

“In my neighbourhood a development of contemporary town-houses were being developed. It really felt like a squeeze and the neighbours were really grumpy about it all the way through. The parking has definitely got worse. But when people saw what enormous prices these houses were being sold for, people suddenly felt good about it. They were really glad to have a development in their area realising such high values and saw the potential knock-on effect on their own house values”.

Parking

In addition to comments on built form and neighbourhood character, the impact of SD on parking provision is a frequent objection/comment to planning applications. Either schemes are described as having insufficient on-site parking or are objected to, on the basis of lack of capacity of on-street parking, to accommodate more vehicles. The policy challenge is that the council is favouring

---

\(^{41}\) A restrictive covenant is a private agreement by a landowner, which prevents a particular action for a property. It is included in the title deeds and may represent any legally permitted restriction. The covenant continues to bind the property even after sale and therefore may restrict behaviour or actions in the future. Restrictive covenants have been used historically to perform a range of functions, such as limiting the land use to particular religious uses, or to retain the property for single occupancy use. In this case the covenant prevents the garden from being developed in perpetuity.
schemes in neighbourhoods with good public transport access or within walking distance of the city centre, on the assumption / presumption that cars are not needed, but future residents will often choose to own and park a car nevertheless. Daytime, but particularly evening parking is reported (and observed on site visits) as difficult in a number of wards experiencing SD. Over time, the cumulative impact of schemes on parking provision can be quite marked.

**Community Infrastructure Levy**
The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for LPAs in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. Bristol City Council states “funds raised will go towards infrastructure that is needed to support the growth of the city, such as schools and transport improvements” (2015). All development comprising 100m² or more of new build floorspace incurs a payment, as does development of less than 100m² of new build floorspace that results in the creation of one or more dwellings.

Unlike affordable housing provision, soft-densification is yielding payment intended for community benefit, with the exception of sub-division (which under the Bristol scheme is exempt) and residential annexes. But CIL payments are not ring-fenced to the community in which the development takes place, with the exception of a small percentage (15%) that goes to the relevant neighbourhood partnership (a group made up of local councillors, voluntary and community organisations, private businesses and public agencies to focus on the specific needs of the area).

Some interviewees pointed out what they perceived to be the “perversity” of CIL, stating that communities “do not see the benefits, because they are not accrued to them, only the pressures” and suggested strongly that CIL ought to be spent mitigating the impact of the development in the community in which it occurs, not on city-wide projects.

**Low density, low value areas are losing out**

“Strategically we should be densifying, but the big issue is about how to densify suburbia. It’s easy where the market is strong and you are close to the centre, but there are fewer options out in the suburbs.”

One interviewee, commenting on a part of Bristol with low market demand, low residential density and a high percentage of social housing, remarked that “it’s the case of those that have. These areas are losing out of from densification, if there is no development there is no support for services and no CIL. I’m happy to see densification if it can increase demand for essential services and guarantee their viability in a place that needs them”.

Bristol policy officers acknowledged that whilst there “was not a great clamour” for development in some of the lower density low value areas, the political priority to deliver as much housing development within the urban core as possible would require sites in some of these areas to be brought forward to meet need: “there’s still a fair supply of odds- and ends, but they will eventually run out.”
5.6 De-densification

“Money coming from London is driving de-densification.”

Few interviewees felt there to be a noticeable trend towards de-densification in Bristol – and this is borne out by the latest Bristol City Council data with only a total of 93 units lost to de-conversion during the period 2006-2015.

Fig. 56. Number of dwelling units lost through de-conversion

![Graph showing number of dwelling units lost through de-conversion](source: Bristol City Council 2015(b))

External signs of de-conversion are not so easy to deduce compared with other signs of SD, but Bristol’s planning application database revealed some recent applications re-conversions, as did some interviewees.

Those that commented on re-conversions felt that this was driven by “London money”, those with the capital to be able to reconvert houses for occupation or rent, particularly in high value areas with specific types of stock, such as large Victorian houses or Edwardian terraces. There was also a perception that the market for de-densification has the potential to be fuelled in the future by the electrification of the London Paddington to Bristol railway line by 2017. This will decrease the journey time from London to Bristol substantially, and further fuel Bristol’s housing market by increasing the attractiveness of Bristol to London commuting, an already increasing trend:

> “Bristol is a popular high value place and is attracting developers from London and other high value areas. They have money and are willing to spend it on taking a chance”.

From a market point of view, it was felt that the financial gains from either de-conversion or re-conversion “could work both ways” depending on the condition of the existing property: “if you have two
flats offering not great accommodation: re-conversion would be an enhancement.” Generally, the re-conversion of flats back to single occupancy dwellings is viewed positively by both local councillors and planners. This appears to relate to two factors. Firstly, whilst policy is focused on increasing the number of units overall in Bristol, the desire to ensure an appropriate mix of housing within an area, coupled with a perceived shortfall of family housing, is likely to result in a positive reception for family houses despite it diminishing the stock. Secondly, there is a perception that households living in larger dwellings are more likely to make extensive links and contributions to community life.

Although not residential de-conversion, a particularly noticeable recent trend involving residential intensification in Bristol is the conversion of offices to housing. This has been brought about by changes in planning regulations in England which allow for the conversion of vacant office space to housing under permitted development rights. Bristol is one of the top 10 LPAs in terms of increased dwellings provision through this route (see British Council for Offices 2015). On one side of a Georgian square in central Bristol – Berkeley Square – 4 dwellings have recently been subject to prior-approval applications for conversion from office to residential, two of which have been for single dwellings houses (featured in Figures 56 and 57) and the other two for student flats.

Fig. 57 & Fig. 58 An example of conversion from office to residential

Source: Hannah Hickman

Data up to March 2015 shows that prior approval rights in relation to office to residential could lead to the development of 1,240 residential units, across 69 individual notifications in the city (see British Council for Offices 2015, 23).
5.6 Hard densification

Hard densification on large sites (defined by Bristol as of 10 dwellings or more) is highly evident in many parts of Bristol, but has been and continues to be particularly prominent within Bristol’s urban core. This visibility is unsurprising given that nearly 11,000 units have been delivered on large sites since 2006. Significant residential developments have been completed and are ongoing in Bristol, particularly around Bristol’s now highly desirable harbourside sites, many of which stalled during the recession.

Two examples of developments currently underway are indicative of the high residential value hard densification taking place in Bristol currently. The first, the part refurbishment and part re-development of the Bristol General – a disused hospital dating back to the 1850’s close to Bristol’s Central Train Station – includes 3 bedroom apartments being marketed at £995,000 (http://www.cityandcountry.co.uk/developments/the-general-bristol/). The second, Bristol’s Whapping Wharf development, on a large brownfield site to the south of Bristol’s harbourside, includes 2 bedroom apartments being marketed at over £500,000.

Fig. 59. An example of hard densification in Bristol: Wapping Wharf

Although hard densification was not the predominant issue with interviewees, there was a clear sense that whilst it puts significantly greater pressure on services, such as school places and transport links than SD, the critical mass of larger scale development is such that – in theory at least – their impacts in relation to service provision can be better planned for, whereas the cumulative impact of SD (as noted above) is harder to calculate.

There was some suggestion from interviewees that SD can cause greater interest and attention from communities than hard densification, perhaps because hard densification often takes place on large brownfield sites with fewer adjacent / existing residents compared with SD, where neighbouring residents consider themselves directly affected by development.
Bristol LPA is in favour of densification and has pursued it through local planning policy. Politically there is concern over urban sprawl into the surrounding green belt, so development is constrained to the existing urban area. Densification is considered to enhance environmental and social sustainability. These two reasons have led to strong support from the council for densification.

Whilst hard densification remains the predominant form of housing development in Bristol, a considerable number of units have been developed each year through SD – amounting to 11.7% of net additional housing stock over the period 2006-2015. An annual average of 348 units a year is delivered on small sites.

There are major policy restrictions on the expansion of the city into its surrounding green belt. Consequently, a policy environment in favour of the on-going densification of the city is the only politically acceptable means of meeting its housing needs. While there is no explicit policy on SD, there are some quite exacting policy requirements relevant to such schemes – particularly around garden development and residential sub-division. However, these have not prevented a substantial number of units resulting from SD.

Soft-densification appears to more likely where the development involved is complementary to the existing urban fabric and is close to public transport and other services. It follows, therefore, that whilst SD has occurred across the city over this period, it has been more marked in neighbourhoods with an already dense urban form. Dense neighbourhoods have been allowed to become more dense, whilst lower density areas – by virtue of their existing morphology – have not been the subject of such pronounced densification.

As long as the market remains strong, densification is likely to continue. The City Council is assuming – based on past trends – that about 300 units a year are likely to come from small windfall sites (sites not already allocated within the local plan). Looking further ahead, the emerging joint strategic plan for the wider West of England sub-region places considerable emphasis on the (re)development of existing urban areas in order to continue to minimise greenfield development. This is despite acknowledgement of the potential danger of “harmful over development” (West of England 2015, 4.3) with its consequential impacts on infrastructure, schools, health facilities and open space. However, assumptions cannot be only trend based. Future policy on and decisions relevant to soft densification need to be informed by a robust evidence base that covers the functional housing market area and not the city alone.

If Bristol is to continue to seek to densify within its urban fabric, a particular challenge appears to be enabling SD to occur in low density areas subject to both high and low market demand. In both types of area there was some suggestion that prevailing policy that protects the existing morphological character of these neighbourhoods might need to be relaxed. Investment in public transport would also be required to allow further densification to happen. Mechanisms for stimulating demand in low value areas would also be needed.
Communities have very mixed opinions about the impacts of development. There is widespread acknowledgement of the benefits of bringing redundant buildings and derelict sites back into use. Some of the architectural innovation that has resulted from SD, and its contribution to the viability of local shops and businesses has been welcomed. However, there are clear concerns about the impact of SD on service provision (particularly school and doctor’s surgery places) and the availability of parking. A perception expressed by all contributors to this study was that neither the English planning system in general, nor the planning policies and practices of LPAs in particular, are able effectively to assess and address the cumulative impact of a series of small schemes. The ability more successfully to connect development impact with service provision would enable SD to be more positively received by communities.
6. Conclusions and recommendations

General Conclusions
This report provides an overview of the intensive research undertaken into the *English Experience of Soft Densification* in two local authority areas in 2015. Whilst their experiences are particular to their contexts, they offer insights into important aspects of SD. The report has drawn on interviews with planning officers, estate agents, developers and residents to explore the drivers, policies and outcomes relating to SD. This section highlights pertinent themes for governments and policy makers seeking to learn from the English experience, before providing recommendations.

The scale and scope of SD and its challenges for urban regulation are likely to depend on the fine-grain of different urban contexts. Local planning authorities are experiencing different pressures for SD and have different capacities and opportunities to facilitate and direct the locations and types of SD. The two cases studies utilized in this report provide examples of alternative situations. Ealing is a suburb of London, the largest conurbation in the UK. It is surrounded by other urban local authorities. Bristol covers a larger geographical area and is less densely populated than Ealing.

In England national planning policy (NPPF) sets the overarching framework for local planning. If anything, planning policy in England has become more centralised in recent years, particularly around issues of housing supply. Since the 1990s, a key aim of national planning policy has been to facilitate a significant increase in new house building by the private sector. Local planning authorities are expected to bring forward sites for development to meet demand. This emphasis on increasing housing supply has reinforced the orientation of English planning policy towards urban containment and urban densification, including a tacit policy of SD. It is now expected that there will be more housing built in urban areas, in new urban extensions and through the selective release of land in the green belt around cities. After 2010 the previous presumption in favour of SD through ‘garden grabbing’ was abolished by the incoming Coalition government with the removal of garden development from the definition of brownfield sites.

Pressure for hard and SD in Bristol and Ealing reflects the combination of market pressures, a national planning policy in favour of development and support for urban intensification in local planning policies. The impact of SD is felt to be more pronounced in Bristol than in Ealing because London suburbs have a long history of SD, particularly in relation to the subdivision of housing. In Ealing, SD is balanced by the re-conversion of subdivided dwellings into single family homes as wealthier residents move into the borough because of higher house prices in areas closer to central London. By contrast, the ‘hot spots’ of SD in Bristol had not previously been the focus of significant levels of SD.

In both Bristol and Ealing there are concerns within the LPA and amongst some residents that SD is not being adequately managed by appropriate policies. The main concerns raised by SD are:

- The visual impact on the residential character of areas (especially in Ealing);
- Pressure on local infrastructure and services (schools, roads, parking, open space);
- The loss of garden space;
• Diminished privacy and its effect on residential amenity.

The case studies present useful examples of how SD maps out in different urban contexts. Ealing represents an already fairly dense urban area, with a long history of densification that is perhaps in the early stages of a new wave of soft densification. There is still considerable potential in Ealing for subdividing private gardens for development and there is a time lag between changes in national policy and the behaviour of local residents, developers and architects. In Bristol, SD is layered onto a recent history of gentrification in central areas of the city and some of the suburbs. SD is fuelled by constraints on development in the green belt around the city. In Bristol, residents, architects and developers have been quicker to respond to changes in national policy, especially in relation to building on garden plots.

A key message for governments considering SD is that appropriate policies need to be put in place to manage some of the potential negative externalities. Examples include:

• Design and conservation frameworks to retain the visual character and heritage of residential areas;
• Assessment frameworks to ensure that development does place undue strains on key aspects of infrastructure and is matched by appropriate investment in schools, childcare, roads and public transport and open space;
• Measures to retain an appropriate balance between development and open space.

Soft densification will be challenging for some residents if it happens too quickly. English LPAs do not have the mechanisms to phase the process of SD and they are struggling to control the pace of change in some residential areas. Concerns about pressure on local infrastructure and services are more pronounced in Bristol than in Ealing. However, although SD is perceived as a problem in Bristol, with the exception of school places residents are reacting to an increased level of activity that can be accommodated by the existing infrastructure. In this respect the research was undertaken at a moment of transition. There is still scope for further densification in Bristol and Ealing.

Finally it should be noted that in both Ealing and Bristol, SD has not led to the out-migration of local residents prompted by concerns about social change and increased activity. In part this is because the opportunities to move are constrained by the limited choice of alternative housing in the city and the wider city region. Soft densification brings younger residents into an area and dwellings are generally of a smaller unit size than the existing pattern of development. It is possible that without those constraints on locational choice, SD could have a more profound impact on the socio-economic profile of the affected residential areas.

A special commentary on garden infill

Garden infill is a politically contested topic in England. It is common to read headlines in national and local newspapers relating to the amount of development that has taken place in gardens. However, the evidence from the Phase I report is that the overall level of garden infill in England is very low and makes only a small contribution to the overall amount of SD. This circumstance also
held in the two case study authorities. In both LB Ealing and Bristol such garden infill as occurred was limited to areas exhibiting low existing development densities and high housing demand and house price. It was not a matter of significant local concern. However, overall averages may mask sub-national trends. There are some local authorities where garden infill is much more prevalent than in others, and this may have prompted a disproportionate political and media response to what are special cases.

There is very little research into the amount of garden infill and the impact that it has on local housing markets, housing affordability and the character of communities in England. One exception is the review of garden development undertaken by Sayce et al (2010) for the Department for Communities and Local Government. The report found that there was no agreed definition by LPAs of garden development and that only a few authorities had created specific policies on garden development. Sayce et al (2010) found that garden infill tended to be a concern only if there was significant housing pressure (e.g. in the South East) and if it occurred in particular types of local authority (major urban and significant rural authorities). The report found that garden development was a particularly sensitive form of development. Applications more likely to be discussed by the planning committee and objections were more likely to be made by local residents.

At the time of the Sayce report (which was published under the Labour government in 2010) garden development applications were not treated separately from other types of planning application. Gardens were designated as brownfield land and therefore treated as such in the planning process. In June 2010, following the election of a coalition government, residential garden land was removed from the definition of brownfield land. The definition of residential gardens had become a political issue in the period leading up to the 2010 election in some areas of the country, particularly in the constituencies of some Conservative MPs. Greg Clarke MP, the current Minister for Communities said:

“For years local people were powerless to do anything about the blight of garden grabbing as the character of their neighbourhoods was destroyed and their wishes ignored. We can see from these statistics that last year an even higher proportion of homes were built on previously residential land, which includes back gardens. Building on gardens robs communities of green breathing space, safe places for children to play and havens for urban wildlife.” (Greg Clarke, cited in BBC, 5th August 2010: [http://www.bbc.co.uk/news/uk-politics-10873333](http://www.bbc.co.uk/news/uk-politics-10873333))

A thorough treatment of the national political debate and the way that it framed garden development as ‘garden grabbing’ requires more space than can be devoted to it here. In brief, the reclassification of residential garden space followed concern amongst some parts of the population over the erosion of urban green space, including the green belt. Despite residential garden development and green belt development being very different concepts the political arguments put forward by the Conservative party (leading up to and after the 2010 election) often conflated the two, emphasizing the differences between the Conservatives and the ruling Labour party on this matter. The reclassification was therefore driven by political expediency as much as it was by any

---

43 Brownfield land in this instance referred to ‘previously residential land’ according to planning guidance, it was therefore in the same category as other types of brownfield land, such as former industrial land.
concern about the absolute number of new homes developed on previously undeveloped residential gardens.

The change in the planning definition of gardens at the national level has not precluded some LPAs from developing local policies on garden infill. But there has been no systematic study of contemporary LPAs policies on garden infill in England.

The issue of garden infill was raised in some of the interviews undertaken during this research. Three issues were raised which, when set within the wider economic and housing market context, provide a partial explanation for the lack of garden infill. First, some communities consider garden infill to have a detrimental impact on the overall image and quality of the neighbourhood. They are therefore unlikely to be willing to sell their own garden, and if a financial motivation is able to change the home owner’s mind it needs to be significant enough to compensate for both the loss of garden and the wider social impact. In neighbourhoods with significant local opposition to garden infill, it may be more difficult for developers to obtain planning permission. Second, garden infill sites tend to be small in scale and therefore are unlikely to be attractive to volume house builders. In this instance house builders are unlikely to have the specialist knowledge (either knowledge of the local housing market or through expertise in small-scale building) necessary to successfully pursue garden infill development.

Given the current lack of research on garden infill and in order to explore how LPAs are responding to these pressures in England it is necessary to conduct a third case study focusing directly on this issue. It is recommended that the selection of a third case study, which would build upon both the quantitative analysis undertaken in Phase I to explore the historic level of garden infill and where a local authority has developed a specific garden infill policy. The Phase 1 report highlighted the high levels of garden infill in Woking, Surrey Heath, Cheltenham and High Wycombe. Investigation of the local authority stances on garden infill and policy documentation would support the rationale for selecting one of these authorities for a further case study.

**Overall Recommendations**

- The collection and maintenance of high quality data on housing market demand, land use and planning is necessary to enable informed policy planning about the appropriate locations and types of soft densification
- The collection and maintenance of high quality data on soft densification is necessary to measure and analyse the cumulative impact of soft densification developments over time and across different spatial scales
- Resources are required to support local authority decision making, including data gathering, analysis and community engagement in the process of informed decision making
- Local authorities to have the ability to create localised policies in relation to different forms of soft densification. These policies may reflect the requirement to constrain the negative cumulative impacts of loss of garden space, amenity and aesthetic values in a neighbourhood where soft densification is occurring.
• To clearly layout the relationship between soft densification and general planning guidelines, for example how national or local space standards apply to different types of soft densification.

• Control of the design and aesthetic impact on neighbourhoods of soft densification, with recognition of the cumulative impact of multiple developments.

• Financial provision either through the planning process (e.g. obligations) or through other mechanisms to provide the full level of resources required to support the impact of soft densification (for example on school places, doctor’s places, transport networks).

• Further research is needed to understand the specific issues related to garden infill in areas where garden infill makes a significant contribution to soft densification.
7. References


Bloxham, T; J Falkingham J; N Johnson, 2011, Urban Splash: Transformations, RIBA publishing


Jones Lang LaSalle. (2014). The Supply Conundrum. ill.co.uk/residential


Maccreanor Lavington Architects, Emily Greeves Architects, Graham Harrington Planning Advice (2012), Housing Density Study, Greater London Authority.


Outer London Commission (2012), quoted in Greater London Authority (2012), Housing Supplementary Planning Guidance


8. Appendices

The appendices provide the opportunity to include further evidence from the quantitative analysis or to exemplify through source documentation the issues pertaining to soft densification in Ealing and in Bristol. The appendices are not included in the main text of the report in order to provide a directed narrative of the main issues of soft densification.

Appendix A: Soft densification grid maps of LB Ealing
Appendix B: Planning New Garden Space Supplementary Planning Document, Ealing
Appendix C: Soft densification and Bristol’s neighbouring authorities
Appendix D: Soft densification grid maps of Bristol and neighbouring authorities
Appendix A: Grid Maps of LB Ealing

Greys on all illustrations indicate locations that are not Single Family Residential Neighbourhoods (SFRNs)
LB Ealing: Intensity of Residential Property Transactions 2001-2011
300m moving average
Appendix B: Planning New Garden Space Supplementary Planning Document in Ealing

Background

What is the Scope and Purpose of this document?
Urban domestic gardens represent a significant component of the boroughs urban landscape, and make a real contribution to its character, through shaping local pattern and grain. Nationally they can contribute from 22-27% of the total urban area in many cities, and can represent nearly half of all urban green space.

Where space is well planned this can add considerably to the quality of the place, enhancing its character, and making the borough an attractive place to live. Gardens also have a wide range of environmental benefits too and when appropriately designed can help control urban temperatures and act as a carbon sink. Through intercepting rain, and slowing runoff, gardens can also help to prevent flooding. Gardens often provide important habitats for wildlife and improve human health both psychologically and physically, providing space for play and recreation.

Despite this recognition, securing sufficient and quality provision can be challenging. Far too often new provision is poorly designed and as a result is underutilised. Moreover where the right amount and quality of provision is achieved this can sometimes be at the expense of securing other important forms of open space.

Pressure for new housing and other development can also mean that existing garden provision is threatened/compromised by inappropriate development. This may take a number of forms including extensions to existing properties encroaching onto existing garden areas, or the subdivision of existing gardens to accommodate new residential units. The later often referred to as ‘Garden Grabbing’ has been the focus of considerable attention of late.

The policies in the Local Plan which this supplementary planning document (SPD) supplements seek to secure sufficient and quality provision of garden space. Whilst the SPD is primarily written to guide new garden provision triggered by development, the principles established in this guidance, and the standards set through policy, apply equally when determining the acceptability of proposals which impact on existing provision, either directly in terms of the loss of space, or indirectly through altering the quality/value of that space.

This SPD mainly serves to amplify the provisions relating to garden development that are set out in other documents, principally the Ealing Development Management Development Plan Document (DM DPD) and London Housing supplementary planning guidance (SPG).

Whilst the document primarily focuses on residential garden space, it recognises the relationship with other forms of open space, including public...
space, and accordingly it provides guidance on how these space types should interface.

For the purpose of interpreting this guidance 'garden' means any land within the curtilage of a building, the principle use of which is residential, which is reserved for the use of occupants and the public is generally excluded.

Under this definition gardens can take on a number of forms reflecting the setting and nature of the residential use they serve. This might include private rear gardens reserved exclusively for the occupants, or communal space, shared by the numerous properties, but excluded from public access. This space might be provided on the ground floor or at higher levels through balconies, winter gardens, terraces or roof gardens. Throughout the guidance a distinction is also made between ‘useable’ space which is visually separate and screened from the public and counts towards the quantitative standards in policy 7D, and more exposed areas, such as front gardens which don’t contribute to the quantitative standards but are nonetheless still significant in contributing to the setting of the development.

What is the status and material weight of this document?

This SPD will form part of Ealing’s Local Plan and it supplements the policies contained within Ealing’s Development Strategy, Development Sites and Development Management DPDs which, together with the London Plan (2015), form the Development Plan for the borough.

This SPD does not introduce new policies or requirements but rather assists in the interpretation and application of existing policies, and should help applicants make successful applications. This guidance will therefore be a material consideration for decisions on planning applications.

It has been prepared in line with the requirements of the Planning and Compulsory Purchase Act 2004 and associated regulations and guidance on the preparation of supplementary planning documents.

Has the document been the subject of a Sustainability Appraisal/Strategic Environmental Assessment?

Sustainability appraisal is not required for supplementary planning documents but the Council must still consider whether there is a requirement for a strategic environmental assessment and a habitats regulations assessment.

In this instance the SPD is intended to inform the implementation of an up-to-date policy in a higher-level plan, and that plan has itself been the subject of sustainability appraisal which incorporates the requirements of strategic environmental assessment. The SPD does not introduce new policy or modify the existing policies, and therefore is unlikely to give rise to significant environmental effects.

Similarly, having regard to the role of the SPD and the habitats regulations assessment already carried out in connection with the Development Strategy, neither does the Council consider that the subject SPD is likely to have a significant effect on any European site.

What is the Policy Context?

The provision of gardens as part of residential development responds directly to three Development Management DPD policies:

- **Policy 7D Open Space**: which sets out the quantity and type of open space that needs to be provided
- **LV 7.4 Local Character**: which describes how local pattern and grain should be reflected in site layout and coverage
- **Policy 7B Design**: which sets out amenity considerations such as daylight and privacy that may affect the layout of garden space

These policies apply to all new housing units whether new build or the result of conversions or subdivisions.

The guidance outlined in this document should also be read alongside the Mayor of London’s Housing Supplementary Planning Guidance (SPG).
Guidance

1 The Proposed Approach

The extent, shape and layout of residential garden spaces is a function of all three of these policies, not just the minimum standards in Policy 7D. Instead, the form of garden space provided in developments is a component of their overall approach to design including considerations of privacy, design and daylight or sunlight.

In understanding the requirement of a given site for garden space it may be helpful to use the following design process;

1. Establish open space need and amount
   Determine the policy requirements for open space provision, including garden space, in the development as set out in DM DPD table 7D.2 based upon the number and type of proposed dwellings. Only garden space which is fit for purpose, genuinely private, screened from roads and not permanently overshadowed will count towards meeting the quantitative standards in this policy. Whilst front gardens are typically excluded when undertaking such calculations, they do make a significant contribution to the setting of the development.

   Area requirements for Public Open Space, Allotments, Children’s Play Space and Active Recreation should be determined based on occupancy levels. Occupancy levels can be calculated using the GLA’s Population Yield Calculator³, and the child yield calculator outlined in the Mayor’s SPG ‘Play and Informal Recreation SPG’⁴.

2. Scope public to private open space ratio
   Determine the current need for different types of open space in the area. See note and figure 1 below.

3. Analyse pattern and grain of local area
   Assess the layout of open spaces and buildings in the immediate area of the proposed development including the degree of site coverage by built structures and green space, and the separation between buildings. London Plan policy 7.4 and our local variation requires development to have regard to the form, function and structure of areas, places and

---

³ See http://data.london.gov.uk/dataset/population-yield-calculator
⁴ See https://www.london.gov.uk/priorities/planning/publications/shaping-neighbourhoods-play-and-informal-recreation-spg

---

streets. Gardens can clearly be very much part of this form, function and structure, and their provision and design should respect and contribute to this context. In order to establish a local context a site based assessment will be necessary, which might as a starting point take the general density typologies outlined in local variation to policy 3.4.

4. Assess functional requirements of garden space
   Understand the extent to which garden space will be necessary to fulfil functional requirements such as privacy, or day lighting and sun lighting requirements.

5. Design layout and use of garden
   Using all of the above information, design a garden space that best complements the functional needs of the proposed dwellings and any strong or positive elements of local character.

It should be noted that whilst described as a linear process, in practice the sequence of stages might vary, with some stages overlapping and others being revisited.

---

Interface with the London Housing SPG Private Outdoor Space

All new housing is required by the London Housing SPG to provide a minimum of 5 sq. m. of private outdoor space for 1-2 bedroom units and an extra 1 sq. m. for each additional occupant (Housing SPG Standard 4.10.1). This is a minimum standard and will be required of all residential development. Typically this will be supplemented by additional space, which can take the form of either additional garden space (private or communal), and/or public open space (incorporating child play space, allotments or space for active recreation). In certain circumstances it may be appropriate and preferable to secure a financial contribution in place of space provision. A choice therefore exists in terms of the form that this provision takes which will need to be determined having regard to the specific circumstances of a case and its context.
Scoping public to private open space ratio

As noted above, with regard to any supplementary provision this can take a variety of different forms, and should respond to the specific needs of the site and context. The diagram overleaf outlines the key determinants which should inform applicants in prioritising the form that this space takes, and specifically the balance between private and public space.

It should be noted that the diagram is for illustrative purposes only and is not intended to convey that public open space should necessarily take priority over private space. This is a matter which will be judged on a case by case basis having regard to the specific circumstances of the case, its context and the Council’s spatial priorities in terms of future provision.

The provision of private or semi-private space may be prioritised where:

1. There is a need to protect established local communities or schemes, in order to maintain a local environment which may be a selling point and has the potential to generate the support and interest of businesses and residents who are active in the local area.

The provision of public space may be prioritised where:

1. There is a need to protect the amenity of existing and new residents, or those for whom substantial additional open space is in the interest of privacy.

2. Demand outstrips the capacity of existing provision. This may arise through the development of projects on large sites in areas that have public open space, but the quality provision has to be net new (i.e. not simply a matter of upgrading). The lack of a local community or local interests that can be engaged to ensure that the public space is properly managed and maintained is the key to achieving the supply of POS per unit land area and as a proportion of the provision. The provision of POS per unit of development will be a matter for local residents and the planning condition that the provision of POS is required.

3. The site is located in an area of Public Open Space advocacy, where there is a larger demand for the development of POS, which may be achieved by providing more POS than is required by the London Housing SPG minimum.

4. The provision of POS is required by the London Housing SPG minimum.

5. The provision of POS may be considered a matter of public interest.

Figure 1 – Determining the ratio between Private and Public Space
2 Principles underpinning good Garden Design

Once the amount and type of open space has been determined the next key step will involve designing the garden space itself, which should be underpinned by the following key principles:

1. Gardens should not be leftover spaces
Garden spaces are not just what is left over from the footprint of the building. Just as dwellings should be designed by giving consideration to circulation and the use of spaces, gardens should be laid out with reference to the functional needs of the space for access, use and adequate sunlight. Proposals for excessively narrow, irregular or overshadowed garden spaces will be refused.

Where space is constrained, innovative design solutions should be explored, including the utilisation of roof areas to accommodate garden provision, subject to other amenity considerations being satisfied.

2. Development should reflect local building patterns layout and site coverage
Development must respond intelligently to all aspects of a strong or positive local character. This includes typical building separation and extent of site coverage even where these may not be specifically mandated by garden provision standards. Accordingly the established urban grain may be an equal determinant in the layout of space.

3. Private outdoor space should be directly attached to dwellings
The ‘private outdoor space’ component of garden space, i.e. that which is provided to satisfy London Housing SPG standards (4.10.1-4.10.3), should be directly attached to the dwelling that it serves, whether as a balcony or wintergarden in the case of upper floor flats, or as a private garden or terrace in the case of ground floor flats, or detached, semi-detached, and terraced houses. This space should be exclusively accessible to its assigned flat, and visually separate and screened from other spaces.

Where such space is provided at grade, appropriate boundary treatment should be chosen to assist in screening the windows of the properties it serves from any adjoining communal areas.

Where such space is supported by communal garden provision access to communal area should be secured for all units which do not benefit from enhanced private garden provision. Whilst those units benefiting from such access may not enjoy direct access, the space and accommodation should be designed to ensure that access is as convenient as possible.

Garden space should be designed to ensure that it is accessible to wheelchair users and other disabled users. An accessible and ideally level route should be provided between the external door and the outdoor space.

To protect the amenity of neighbouring residents such space should also be carefully sited/designed to minimise its impact on adjoining users. These impacts might include light spill, noise and overlooking.

4. All garden space is at least semi-private
Garden space in urban areas does not usually enjoy total privacy, however there is a reasonable expectation for garden spaces to be protected from excessive exposure or oversight, or they are unlikely to be used by residents. Where spaces offer little or no privacy to users then they will not be considered to count towards the quantitative garden space standards. Where space permits different functional zones could be created with varying degrees of privacy to support the differing needs of users.

Conversely new garden provision should also be carefully sited and designed to minimise overlooking of existing neighbouring dwellings.
The landscape design should also seek to ensure that it is accessible to wheelchair users and other disabled people\(^1\).

7 Siting, layout and design should where appropriate contribute to the establishment of Green Infrastructure (GI) networks

Whilst much garden land is privately owned and not accessible to the public, gardens can make an important contribution to the function and quality of Green Networks/Chains, and particularly in relation to the movement of wildlife. Where new garden provision is being provided/designed, and this adjoins/forms a link in a wider green network/chain, both the layout and landscaping treatment should be designed to maximise such connections. Policy 5.11 of the Development Management DPD also requires that Green Roofs should be provided on major developments that fall within 100m. of designated open space, and this might form a key element of the overall design scheme.

3 Front Gardens

Whilst the guidance above primarily relates to private and screened areas of garden space which count towards the quantitative standards outlined in policy 7D, front gardens also make an important contribution to the setting of development and its overall sustainability, and accordingly careful consideration should be given to their design too.

Some of the principles outlined above, including in particular the need to maintain established urban grain, will also inform the provision of space to the front of properties.

The area between dwellings and the highway provides one of the best opportunities for enhancing the appearance of new development. Careful attention to matters such as permeable surfaces, tree and shrub planting, and the erection of walls and railings can make a significant contribution in this regard.

Whilst less common these days in relation to new housing design, where exclusive parking is proposed within the front curtilage of the property, the design of this front garden space should seek to maximise the amount of space which is naturally vegetated, with at least 50% being planted. The remaining 50% or less might comprise a combination of hard surfacing (approximately 20%) and cellular paving (approximately 30%). For further advice see also www.ealingfrontgardens.org.uk.

The use of a physical boundary or ‘means of enclosure’ helps to define the extent of private space which has been shown to help with crime prevention and helps to reduce the visual impact of any off-street parking at the front of dwellings. Where front garden physical boundaries exist in neighbouring areas these should continue to be used in new development. In order to

\(^1\) Useful guidance on this matter can be found at www.accessiblegardens.org.uk
reduce opportunities for crime it is however appropriate for front gardens to be overlooked by other dwellings.

4 Existing Gardens
Whilst this guidance is principally targeted at new garden provision, the qualitative standards outlined in policy 7D and the key design principles promoted above in relation to new provision, provide a useful measure from which to determine the appropriateness of change in relation to existing garden provision.

For example, when dealing with a proposal involving the loss of part of a garden it will be necessary to establish whether the resultant development brings the existing garden area below current quantitative standards or undermines the quality of the original space contrary to the principles outlined in guidance above, and policy 7B of the Development Management DPD. It will be necessary to demonstrate for example whether the original garden area remaining is still of functional value, and an appropriate level of privacy is retained. A proposal involving the reconfiguration of existing garden space resulting in a small, poorly shaped, overlooked and overshadowed garden serving the existing neighbouring unit(s) is unlikely to be acceptable, and this guidance provides a useful means to judge this. Similarly the contribution of existing gardens to the form, function and structure of areas requires careful consideration when judging proposals which alter the existing provision.
Appendix C: Soft Densification and Bristol’s Neighbouring Authorities

BANES (Core strategy adopted 2013)

- Site specific density policies under ‘placemaking principles’ are of between 35-40 units per hectare (lower than Bristol), densities vary according to site allocations;
- Clear that definition of brownfield land excludes residential gardens – no other mention;
- Policy HG.12 on dwelling subdivision, conversion of non-residential buildings, and re-use of buildings for multiple occupation & re-use of empty dwellings, discourages sub-division of family type accommodation to flats, but acknowledges the scope, particularly in Bath itself, for the sub-division of large, older buildings to make a contribution to the need for smaller dwellings. It states that such development proposals will be permitted if it:

  i) is compatible with the character and amenities of adjacent established uses, taking into account the development itself together with any recent or proposed similar development;
  ii) does not seriously injure the amenities of adjoining residents through loss of privacy and visual and noise intrusion;
  iii) is not detrimental to the residential amenities of future occupants; and
  iv) does not result in the loss of existing accommodation which, either by itself or together with other existing or proposed dwellings in the locality, would have a detrimental effect on the mix of size, type and affordability of accommodation available in the locality.

South Gloucestershire Core Strategy adopted 2012

- Notes the problems of the cumulative effect of sub-division and development on gardens – noting loss of green space, and traffic congestion in particular. However, intensification is also noted as helping to contribute to the provision of a range of housing types, local mix and affordability of housing, supporting the vitality and viability of local services, “as long as it is done sensitively and doesn’t impact residential amenity and character”.
- Policy appears to allow such development where it won’t adversely affect the character of the area, and, where cumulatively it would not lead to unacceptable adverse traffic congestion or parking concerns. Development will be allowed where properties have sufficient access to private or communal shared open space, within the immediate vicinity.
- Unlike in Bristol, Policy CS15 Distribution of housing – make assumptions about numbers coming from in-fill and small sites as part of the authorities overall housing target.

North Somerset

North Somerset’s core strategy was adopted in 2012, but was subject to a successful high court challenge in 2013. Policies in relation to the scale and distribution of housing, including on in-filling and conversion are currently remitted back to the planning inspectorate. That said, the adopted strategy does state, that “development proposals, such as the residential intensification through the use of garden land (‘garden grabbing’) must be carefully assessed against the harm they may cause to the character of the local environment” (3.20).
Appendix D: West of England densification context
West of England Simple Deprivation 2001
West of England Simple Deprivation 2011
West of England Average House Prices 300m moving average
West of England N of Housing Transactions 300m moving average