

Full Year Housing Monitoring Update for Monitoring Year 2021/22¹

Housing Completions – Summary

Between 1st April 2021 and 31st March 2022 there were a total of **402 net housing completions**:

Some of the main developments have been;

- 403 homes were completed on traditional (Use Class C3) housing sites
- 5 homes were lost through changes to other uses
- Changes of use of existing buildings to residential use and conversions to existing residential properties accounted for 40 (10%) of all completions, and
- Development sites including the York St John University Playing Fields, Windmill Lane (69), Lowfield School site (68 - inclusive of one self-build plot) and the Germany Beck site in Fulford (65), all provided notable completions during the monitoring period, whilst 72 homes were completed on sites providing 5 homes or less.

Housing Consents – Summary

Housing approvals between 1st April 2021 and 31st March 2022 totalled **327 net additional homes**. This total represents a fall compared to the high level of approvals achieved over the last four years where more than eleven hundred homes had been consented annually. However, during the full monitoring year a further **247 net new homes** had the benefit of a resolution to grant permission subject to the signing of a legal agreement. **970 homes** on land allocated for housing in the draft Local Plan are subject to an appeal decision later this summer. In contrast, a number of previously approved developments had overall totals **reduced by 128 homes** during the monitoring period that impacted on the overall figures.

The main features of the consents approved during the full 2021/22 monitoring period were;

- 307 of all net homes consented (93.9%) were granted on traditional (Use Class C3) housing sites,
- Notable housing schemes were approved at the Former York City Football Club, Bootham Crescent (93), Burnholme Community Hub (83) and Former Duncombe Barracks site (34)

¹ Please note that this update does not include data relating to completions or consents of communal establishments as required by DLUHC as part of their Housing Flows Reconciliation Return for 2021/22 – these details have been collated and will form Section H of our annual return later in the year.

- A further 104 student cluster flats at Mecca Bingo, 68 Fishergate, 83 homes at Eastfield Lane, Dunnington and 48 homes at Cherry Tree House, 218 Fifth Avenue had a resolution to grant planning permission subject to legal agreements prior to 31st March 2021. These are in addition to the 327 homes with full approval.
- An application on Land North of Monks Cross that is allocated within the draft Local Plan (ST8) for 970 homes went to appeal in January 2022 due to non-determination and a decision from the SoS is anticipated later this summer. Indications are that CYC Planning Committee would have approved this scheme if the Local Plan had been adopted.

Housing Monitoring Update

1. Housing Completions 2021/22

- 1.1. A total of **402 net housing completions**² took place during the full 2021/22 monitoring year³ (see Table 1 below).
- 1.2. This figure is the result of compiling data from a number of sources comprising:
- Results from 6 monthly site visits to verify the number of housing completions which have been carried out on each consented housing site,
 - Analysis of monthly Building Control completions returns that provide information of both City of York Council and private building inspection records,
 - Regular contact with developers/applicants for each site over 10 dwellings to accurately monitor completions and to estimate the likely level of completions over the term of the build programme, and
 - Monitoring of extant consents, new permissions, developments allowed on appeal and the inclusion of development through certificates of lawful development previously not included within housing returns

Table 1: Housing Completions 2021-22 (1st April 2021 to 31st March 2022)

Time Period	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
1 st April 2021 – 30 th September 2021	165	122	6	33	1	160
1 st October 2021 – 31 st March 2022	254	228	12	7	5	242
2021/2022	419	350	18	40	6	402

- 1.3. Table 2 highlights the more significant developments that resulted in housing completions on traditional housing sites (Use Class C3) over the full monitoring period. Notable completions included:

- Full completion of the Former Terry’s Factory site providing a total of 65 new homes;

² Net housing completions are calculated as the sum of new build completions, minus demolitions, plus any gains or losses through change of use or conversions to existing properties

³ Each monitoring year starts on 1st April and ends the following year on 31st March

- 65 dwellings at Germany Beck, Fulford;
- 68 homes on the Former Lowfield School site, this included the first completion of a self-build plot;
- 69 homes on the York St John University Playing Fields, Windmill Lane, whilst
- 72 homes over the full monitoring year on sites developing five or less homes.

Table 2: (Use Class C3) Housing Completion Sites

Site Name	Net Completions (1 st April 2021 to 30 th Sept 2021)	Net Completions (1 st October 2021 to 31 st March 2022)	Net Completions (2021/22)
Del Monte Skelton Park Trading Estate	6	0	6
Proposed Hotel 46-50 Piccadilly	8	0	8
61a Gale Lane	0	9	9
Rear of 25 Bootham	9	0	9
Fiesta Latina 14 Clifford Street	9	0	9
Z Curry & Sons Ltd Workshop R/O 2 Hawthorne Street	0	10	10
Savilles (UK) Ltd 48 Bootham	14	0	14
Former Terrys Factory Bishopthorpe Road Phase II	11	20	31
Block K Joseph Terry Grove	0	34	34
Germany Beck Site East of Fordlands Road	35	30	65
Former Lowfield School Dijon Avenue	31	37	68
York St John University Playing Fields Windmill Lane	0	69	69
Sites providing 5 dwellings or less during the monitoring period	35	36	72
All Sites	158	245	403

1.4. Table 3 provides a breakdown of the categories that make up the overall housing completions for the full monitoring period. These categories are analysed further in this update and Tables 4 to 6 reference significant individual sites and their associated completion numbers.

Table 3: Components of Housing Completion Sites

Time Period	Type of Approval	Number of Sites with Completions	Gross Additional Homes Completed	Net Additional Homes Completed
1 st April 2021 – 30 th September 2021	Residential (Use Class 3) ⁴ Approval	33	161	158
1 st April 2021 – 30 th September 2021	Privately Managed Off Campus Student Accommodation	1	1	1
1 st April 2021 – 30 th September 2021	Sites Granted Certificates of Lawful Use/Development	1	1	1
1 st April 2021 – 30 th September 2021	'Prior Approval' Sites (see paragraph 1.6 below for details)	2	2	2
1 st April 2021 – 30 th September 2021	Sites Lost to Housing Through Change of Use ⁵	1	N/A	-2
1 st October 2021 – 31 st March 2022	Residential (Use Class 3) Approval	38	254	245
1 st October 2021 – 31 st March 2022	Sites Lost to Housing Through Change of Use	3	N/A	-3
2021/22			419	402

1.5. Table 4 provides details of the two sites where completions took place within the 'prior approval' category during the full monitoring period.

1.6. With a total of just 2 net completions resulting from this type of development over the twelve month monitoring period this represents a significant fall in the supply of homes from this source compared to more recent years. Central Government have recently expanded 'prior approval' rules to allow for greater flexibility in the change from current E - Use classes to residential use and it will be interesting to see how the supply from this source is affected in future years.

⁴ Dwelling houses – for full definition see the Town and Country Planning (Use Classes) Order 1987 (as amended) 25th February 2016. See also the 2017/18 Housing Flows Reconciliation (HFR) form.

⁵ The change of use from 4 residential homes (Use Class C3) to commercial (Use Class E/Sui-generis) took place during the monitoring period.

Table 4: Housing Completions Resulting from ‘Prior Approval’ Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 st April 2021 – 30 th September 2021	Pine Alley Workshop Carey Street	1	1
1 st April 2021 – 30 th September 2021	Wheldrake Hall Farm 6 Church Lane Wheldrake	1	1
1 st October 2021 – 31 st March 2022	None	0	0
2021/22		2	2

1.7. Just one privately managed off campus student accommodation development was completed during the monitoring year at Flat 212-214 Fulford Road that provided one ‘cluster’ flat during the first half of the monitoring period. Please see paragraph 1.10 and Appendix 1 which explain how student accommodation is assessed in terms of housing completions.

Table 5: Completions via Off Campus Privately Managed Student Accommodation Sites

Time Period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1 st April 2021 – 30 th September 2021	Flat 212-214 Fulford Road	1	1
1 st October 2021 – 31 st March 2022	None	0	0
2021/22		1	1

1.8. In line with DLUHC dwelling definitions⁶, student accommodation ‘*can be included towards the housing provision in local development plans*’ and ‘*purpose-built (separate) homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling*’.

1.9. National Planning Practice Guidance (NPPG) advice has been removed in relation to how authorities should deal with student housing in their housing supply⁷. However, through their dwelling definition in the Housing Flow Reconciliation (HFR) returns form and guidance notes⁸, DLUHC has provided clarity to local authorities in how to deal with student accommodation and communal accommodation in their assessment of completions (see also Appendix 1).

⁶ see: <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>

⁷ NPPG: Paragraph: 038 (Reference ID: 3-038-20140306).

⁸ see: <https://www.gov.uk/guidance/dwelling-stock-data-notes-and-definitions-includes-hfr-full-guidance-notes-and-returns-form>

- 1.10. Each housing site, including off campus privately managed student accommodation, has been assessed in accordance with the HFR guidance, which is reported in Table 5.
- 1.11. No completions for development of over 55's accommodation/homes for the elderly or homes with limited care took place during the monitoring period.
- 1.12. Sites granted Certificates of Lawful Use (CLUs), Certificates of Permitted Use (CPU) together with Certificates of Lawful Development (CLDs) accounted for one net additional home within our completions returns for the full 2021/22 monitoring year (see Table 6).

Table 6: Completions through Certificates of Lawful Use and Permitted Use

Time period	Site Name	Gross Additional Homes Completed	Net Additional Homes Completed
1st April 2021 – 30th September 2021	4A Boroughbridge Road	1	1
1st October 2021 – 31st March 2022	None	0	0
2021/22		1	1

10 Year Trend Data

- 1.13. To put this in an overall context of completions over time, Table 7 provides details of net housing completions for the previous 10 monitoring years.

Table 7: Dwelling completions and Demolitions by Year, 1st April 2012 to 31st March 2022

Year	Completions	New Build	Net Conversions /COU	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
2012-2013	540	441	70	9	61	29	482
2013-2014	374	302	57	3	54	14	345
2014-2015	523	378	139	7	132	10	507
2015-2016	1171	908	219	1	218	6	1121
2016-2017	996	420	564	21	543	7	977
2017-2018	1336	1111	195	12	183	10	1296
2018-2019	481	299	155	18	137	5	449
2019-2020	596	437	134	11	123	11	560
2020-2021	643	469	159	14	145	6	622
2021-2022	419	350	58	18	40	6	402
2012-2022	7079	5115	1750	114	1636	104	6761

1.14. The figures reveal that York experienced a mean average⁹ of **676.1** annual completions over the last 10 monitoring years (2012/13 to 2021/22). This compares to a median average of **533.5** over the same period. For the last 5 years, a mean average of **665.8** additional homes per year have been built (2017/18 to 2021/22), this compares to a median average of **560** for the same time period.

⁹ See note at end of this report that explains the difference between both a mean and median average

2. Housing Consents 2021/22

2.1. During the full 2021/22 monitoring year a total of **327 net new homes** were approved within the City of York authority area. This indicates a distinct fall compared to the high annual consent figures experienced during more recent years. However, during the full monitoring year a further **247 net new homes** had the benefit of a resolution to grant permission subject to the signing of a legal agreement (see Table 16 below). Further, previously approved developments had overall totals **reduced by 128 homes** during the monitoring period (see Table 15). When taking these sites into account the situation overall becomes healthier in terms of permissions especially considering there are a total of 7,648 extant consents at 1st April 2022.

Table 8: Housing Consents (1st April 2021 to 31st March 2022)

Time period	Consents (Gross)	Proposed New Build	Proposed Net Conversions	Proposed Net Change of Use	Proposed Demolitions	Potential Net Dwelling Gain
1st April 2021 – 30th September 2021	125	74	1	39	6	108
1st October 2021 – 31st March 2022	229	192	7	23	3	219
2021/22	354	266	8	62	9	327

2.2. Analysis of recent housing consents indicates that by far the largest proportion of housing schemes granted approval over the monitoring period were the result of 307 net homes being approved on standard housing sites (Use Class C3).

2.3. Table 9 provides details of the contributors to this total. Three sites make up 210 of all homes approved during the 12 month period and equate to 64.2% of all approvals:

- 34 homes at Duncombe Barracks, Burton Stone Lane¹⁰;
- 83 homes at Burnholme Community Hub, Mosssdale Avenue¹¹; and
- 93 homes at York City Football Club, Bootham Crescent¹².
- 61 homes were approved on sites with a capacity of 5 or less homes

¹⁰ This is a CYC Housing Delivery Programme site

¹¹ Allocation H3 in the submitted Local Plan Publication Draft (2018) currently under examination.

¹² Allocation H7 in the submitted Local Plan Publication Draft (2018) currently under examination

Table 9: Traditional (Use Class C3) Housing Consents

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	11 The Crescent	9	9
1 st April 2021 – 30 th September 2021	George Chapman (York) Ltd 86 Heworth	9	9
1 st April 2021 – 30 th September 2021	1 Duncombe Barracks Burton Stone Lane	34	34
1 st April 2021 – 30 th September 2021	Sites Granted Consent for 5 or less Homes	50	33
1 st October 2021 – 31 st March 2022	Glen Garage 12 Hawthorn Grove	7	7
1 st October 2021 – 31 st March 2022	WLD Textiles Granville Works Lansdowne Terrace	8	8
1 st October 2021 – 31 st March 2022	Burnholme Cummunity Hub Mossdale Avenue	83	83
1 st October 2021 – 31 st March 2022	York City Football Club Bootham Crescent	93	93
1 st October 2021 – 31 st March 2022	Sites Granted Consent for 5 or less Homes	40	31
2021/22		333	307

2.4. Table 10 provides a detailed breakdown of the categories of housing approvals that make up the consented totals comprising:

- Traditional 'dwellinghouse' residential approvals (Use Class 3),
- Sites Granted Certificates of Lawful Use/Development
- Development of over 55s accommodation / homes for elderly with limited care
- Sites with 'prior approval'
- Privately managed off campus student accommodation
- Sites with reductions in housing numbers due to amendments to original approval

Tables 11 to 16 provide specific details of the sites falling into each category making up the approved totals over the full monitoring period.

Table 10: Components of Housing Consents (1st April 2021 to 31st March 2022)

Time period	Type of Approval	Number of Sites Granted Consent for Housing	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	Residential (Use Class 3) Approval	35	102	85
1 st April 2021 – 30 th September 2021	'Prior Approval' Sites (see Appendix1 for details)	1	4	4
1 st April 2021 – 30 th September 2021	Sites Granted Certificates of Lawful Use/Development	2	2	2
1 st April 2021 – 30 th September 2021	Development of over 55s accommodation / homes for elderly with limited care	1	21	21
1 st April 2021 – 30 th September 2021	Sites with reductions in housing numbers due to amendments to original approval	1	-4	-4
1 st October 2021 – 31 st March 2022	Residential (Use Class 3) Approval	27	231	222
1 st October 2021 – 31 st March 2022	'Prior Approval' Sites (see Appendix1 for details)	2	9	9
1 st October 2021 – 31 st March 2022	Privately managed off campus student accommodation	2	113	112
1 st October 2021 – 31 st March 2022	Sites with reductions in housing numbers due to amendments to original approval	2	-124	-124
2021/22			354	327

2.5. Table 11 provides details of the 3 sites benefitting from 'prior approval' through Office-Residential Conversions (ORCs), Agricultural Buildings to Residential (ABC) and Use Class E to Residential (ERC) with a total of 13 net additional homes approved within this category. This represents a slight increase in consents compared to last year's figures. With the recent expansion of the rules allowing prior approvals by Central Government it will be interesting to monitor the future trends in both approvals and completions in this type of development over the coming years as a result of these changes.

Table 11: Sites Consented as a Result of 'Prior Approval'

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	British Trust for Conservation Volunteers 3-7 Leake Street	4	4
1 st October 2021 – 31 st March 2022	TMS Development International Ltd 128 Holgate Road	8	8
1 st October 2021 – 31 st March 2022	The Lodge Moor Lane Haxby	1	1
2021/22		13	13

- 2.6. During the full monitoring year just one consent was granted for retirement homes/over 55's living accommodation or homes providing limited care, this being for 21 homes at Beverley House, 17 Shipton Road in the first half of the monitoring period (see Table 12 below).

Table 12: Sites Consented for Over 55's Accommodation/Homes with Limited Care

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	JRHT Beverley House 17 Shipton Road Clifton	21	21
1 st October 2021 – 31 st March 2022	None	0	0
2021/22		21	21

- 2.7. Two applications for off campus privately managed student accommodation schemes were approved in the second half of the monitoring year. Table 13, below, provides details of these two sites, the largest of which is the former Plumbase site in Fawcett Street that gained approval for 83 student cluster flats.

Table 13: Privately managed off campus student accommodation consents

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	None	0	0
1 st October 2021 – 31 st March 2022	Plumbase Waterloo House Fawcett Street	83	83
1 st October 2021 – 31 st March 2022	Aubrey House Foss Islands Road	30	29
2021/22		113	112

- 2.8. Table 14, below, provides details of two sites approved through certificates of lawful use/development during the last twelve months and account for two additional homes

Table 14: Consents Granted through Certificates of Lawful Use/Development

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	The Old Vicarage Vicarage Lane Naburn	1	1
1 st April 2021 – 30 th September 2021	4A Boroughbridge Road	1	1
1 st October 2021 – 31 st March 2022	None	0	0
2021/22		2	2

- 2.9. Land at Cocoa West, Wigginton Road (allocation ST17) that had previously been granted consent for 425 homes was significantly reduced in capacity by 123 homes to a new total of 302 homes. This has impacted on the overall net housing consents over the monitoring period. The two sites where reductions to previous approvals are detailed in Table 15 below.

Table 15: Sites with reductions in housing numbers due to amendments to original approval

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	Former Garage Site Mansfield Street	-4	-4
1 st October 2021 – 31 st March 2022	Land at Cocoa West Wigginton Road (Phase II)	-123	-123
1 st October 2021 – 31 st March 2022	Proposed Residential Development Site Shilton Garth Close Earswick	-1	-1
2021/22		-128	-128

- 2.10. In addition to the 327 net additional approvals, a further 247 homes had the benefit of approval through a resolution to grant planning permission subject to the execution of a section 106 agreement. Table 16 provides information of these four sites and capacities agreed by members prior to 31st March 2022

Table 16: Sites with a resolution to grant planning permission subject to the execution of a legal agreement

Time period	Site Name	Gross Additional Homes Consented	Net Additional Homes Consented
1 st April 2021 – 30 th September 2021	Cherry Tree House 218 Fifth Avenue (approved at Main Planning Committee in June 2021)	48	48
1 st October 2021– 31 st March 2022	Barnitts 28A Colliergate (approved at Area Planning Committee in October 2021)	12	12
1 st October 2021– 31 st March 2022	Os Field 2800 Eastfield Lane Dunnington (approved at Main Planning Committee in October 2021)	83	83
1 st October 2021– 31 st March 2022	Mecca Bingo 68 Fishergate (approved at Main Planning Committee in February 2022)	104	104
2021/22		247	247

- 2.11. In addition to the above an appeal took place in January 2022 involving an application for 970 homes on Land North of Monks Cross. The land is currently an allocation site in the draft Local Plan (ST8) and was taken to appeal for non-determination. The decision from the SoS is due later this summer, however, it is likely that the CYC Planning Committee would have approved the scheme had a Local Plan been adopted.

10 Year Trends

- 2.12. In order to provide context of planning approvals over time, Table 17 shows that York has experienced a mean average of **1,191.1** annual housing consents over the last 10 full monitoring years. This compares to a median average of **1,118.5** annual consents over the same period. For the last 5 years a mean average of **1,531.2** annual consents have been granted (2017 to 2022), this compares to a median average of **1,133** for the same time period.

Table 17: Housing Consents Granted Between 1st April 2012 and 31st March 2022

Year	Gross Housing Permissions	Net Housing Permissions
2012/2013	365	337
2013/2014	1556	1531
2014/2015	1294	1264
2015/2016	710	680
2016/2017	487	451
2017/2018	1147	1104
2018/2019	1658	1626
2019/2020	3488	3466
2020/2021	1151	1133
2021/2022	354	327
2012 to 2022	12210	11919

Appendix 1: Notes

Calculation of Student Accommodation Units within the Housing Figures

DCLG produced a “Definition of “General Housing Terms” in November 2012 (see link below)

<https://www.gov.uk/definitions-of-general-housing-terms>

which states that “purpose-built (separate) homes (eg self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling”.

It should be noted that as recently as last year the National Planning Practice Guidance (NPPG) provided further information on how local planning authorities should deal with student housing in their housing supply in the section on housing and economic land availability assessment methodology - Paragraph: 038 Reference ID: 3-038-20140306. This reference has since been removed.

However, MHCLG through their dwelling definition in the Housing Flow Reconciliation returns form and guidance notes

(see link: <https://www.gov.uk/guidance/dwelling-stock-data-notes-and-definitions-includes-hfr-full-guidance-notes-and-returns-form>)

have in the meantime provided clarity to local authorities in how to deal with student accommodation and communal accommodation in their assessment of completions.

Each housing site including off campus privately managed student accommodation has been assessed in these terms by CYC in calculating housing capacity and is represented in the tables above.

For example the Proposed Student Accommodation at Hallfield Road comprised 326 bed spaces in 28 x 1, 2 x 3, 17 x 4, 40 x 5 and 4 x 6 bed cluster units and was calculated as **91** housing units when the DCLG definition was applied. Whereas, St Josephs Convent, Lawrence Street included 660 bed spaces in 514 x 1, 1 x 3, 19 x 5 and 8 x 6 bed cluster units which equated to **542** housing units when the MHCLG definition was applied.

Assisted Living/Over 55's Accommodation

Please refer to Policies H3: balancing the Housing Market and H9: Older Persons Specialist Housing of the emerging Local Plan (Publication Draft February 2018 – Regulation 19 Consultation) that provides the annually assessed need for this type of accommodation which has been evidenced through the SHMA (2016), SHMA Addendum (2016) and SHMA Update (2017). The need for this type of accommodation has been calculated and forms part of our objectively assessed housing need (OAN) and we now

monitor completions against this demand figure. The City of York Council SHMA and Addendum (2016) analysis identifies that over the 2012-2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. Such provision would normally be within a C3 use class and is part of the objective assessment of housing need

Averages used within this document

For clarity;

A mean average results from adding up all the numbers and then dividing by the number of numbers – this is the usual way of displaying an average and takes account of all figures.

The median average is the "middle" value in the list of numbers. To find the median the numbers need to be listed in numerical order from smallest to largest and the mid-point is taken. The potential advantage of using a median average is that very large and very small values don't affect it.

On Campus Student Accommodation and other Communal Establishments

An adjustment to the overall housing figure in accordance with Paragraph 9 of the Housing Delivery Test Rulebook, (whereby on campus student accommodation and other communal accommodation that have two nationally set ratios applied, based on England Census data), has not been included within this report. These figures will be submitted to DLUHC through the annual Housing Delivery Test returns later in the year.

Prior Approval Sites

By way of background information, regulations came into force in May 2013 that increased permitted development and change of use rights in England so that some building work could be undertaken without the need for full planning permission¹³. This was to be a temporary arrangement for 3 years until May 2016. However, in October 2015 the Housing and Planning Minister announced new measures proposed in the Housing and Planning Bill that the then temporary relaxation of permitted development rights allowing for office to residential conversions (ORCs) together with certain retail, financial services and existing agricultural buildings were to become permanent.

¹³ subject to prior approval covering flooding, highways and transport issues and contamination