

Meeting: Planning and Development Agenda Item:

Committee

Date: 8 December 2020

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Application No: 20/00599/FP

Location: 14 Brick Kiln Road, Stevenage

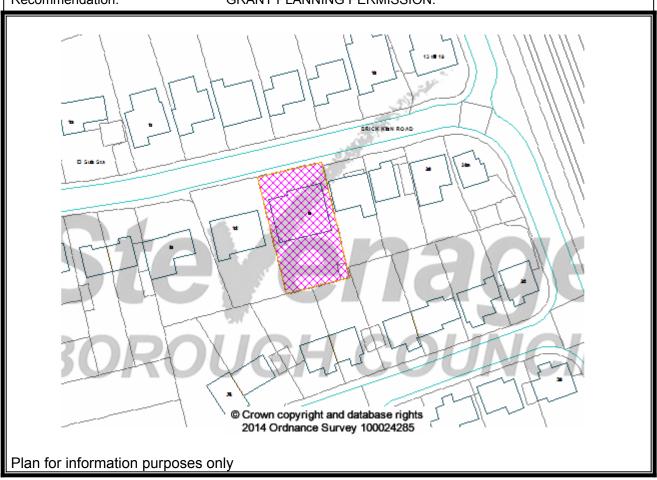
Proposal: Change of use from care home (C2) into 8 bedroom HMO (sui generis)

Drawing Nos.: 2020/32/01; 2020/32/02; 2020/32/03

Applicant: Stevenage Borough Council

Date Valid: 16 October 2020

Recommendation: GRANT PLANNING PERMISSION.



1. SITE DESCRIPTION

1.1 The application site comprises a detached property located on the south side of Brick Kiln Road. The neighbouring property, to the west, is 12 Brick Kiln Road and

to the east lies 16 Brick Kiln Road. To the north, the property fronts onto and takes access from Brick Kiln Road via two crossovers. To the south, the rear garden directly abuts the rear gardens of nos. 30 and 32 Brick Kiln Road.

1.2 Brick Kiln Road is a residential cul-de-sac, lying between Fairview Road and the railway line. The oldest houses are to the west of the road and comprise detached and semi-detached properties, although the road has subsequently been extended with further residential properties constructed to the north and south, including some flats. The frontage of the property is hard surfaced, finished in block paving. Parking provision for 4 cars is available on this area served by the 2 dropped kerbs, each serving two spaces. A wall is located centrally to the front of the property between the two points of access.

2. RELEVANT PLANNING HISTORY

- 2.1 Planning permission granted under ref 2/0442/94 in January 1995 for change of use from dwellinghouse (Class C3) to residential home for the elderly (Class C2) and alterations to front elevation.
- 2.2 Planning permission granted under ref 10/00584/FP in February 2011 for single storey rear extension.
- 2.3 Planning permission granted under ref 13/00014/FP in March 2013 for change of use from elderly persons home (Use Class C2) to family dwelling (Use Class C3).
- 2.4 Planning permission refused under ref 13/00246/FP on 20 January 2014 for change of use from an existing care home into a ten bedroom HMO. The reason for refusal was:-

"The proposal would fail to make adequate provision for car parking as set out in the Parking Provision Supplementary Planning Document January 2012 and would, therefore, be likely to result in the worsening of on-street parking in the locality to the detriment of highway and pedestrian safety contrary to Policy T15 of the Stevenage District Plan Second Review 1991-2011."

An appeal against the refusal of permission was lodged and subsequently dismissed in July 2014.

2.5 Planning permission granted under ref 14/00532/FP on 16 February 2015 for change of use from an existing care home into an 8 bedroom HMO. This permission was never implemented and has now expired.

3. THE CURRENT APPLICATION

- 3.1 The property was granted planning permission for a change of use from C3 (dwellinghouse) to C2 (residential care home) in 1994. The premises ceased operating as a care home in 2012. The current application seeks the change of use of the property from a care home for the elderly, (use class C2), to a large house in multiple occupation (HMO) for up to 8 people, which is classified as a sui generis use. The only external changes proposed to the premises comprise the following:
 - New DDA compliant front door;
 - Removal of front boundary wall to improve disabled access;

- Replace block paving on front driveway to form a ramped approach to front door to create level access;
- Two replacement side doors and new window at ground floor level;
- Replacement rear patio door;
- Rear garden to be cleared of vegetation and paving to be grouted where required.
- 3.2 The remainder of the alterations will be internal. The application drawings show a large, communal kitchen, a dining area and entrance hall with an office at the rear. Also on the ground floor will be three bedrooms and the conservatory allocated as a leisure area. Upstairs will be a further five bedrooms. There is also a basement area which is to remain as a leisure/storage area. All of the bedrooms have their own ensuite bathroom facilities, except bedrooms 2 and 3 on the ground floor which will share a bathroom.
- 3.3 To the front of the property the existing driveway provides 4 parking spaces, two either side of the wall (to be removed). The parking spaces are served by the existing dropped kerbs. A recycling / refuse storage area is identified to the side of the property. Finally, the existing shed in the rear garden would be refurbished to provide secure cycle storage facilities.
- 3.4 Stevenage Borough Council has bought the site to use as an HMO as part of the Council's Housing Service. The Housing Development team has provided the following background information:

The works at 14 Brick Kiln Road are to create a supported accommodation scheme which will provide accommodation to those in immediate need and work with them to offer suitable permanent accommodation. The scheme will be utilised to meet our housing demands within SBC with a focus on the Council's 'Housing First' model, which offers safe and secure accommodation to applicants and works closely with the clients to help them integrate and thrive within the community. The scheme's implementation has been accelerated due to the great demand which covid-19 has placed on Council resources and will play a vital role in improving social cohesion, improving the lives of residents across the borough and reduce the risk of covid-19 exposure to those at risk. The scheme will be managed by Stevenage Borough Council and will have on-going support from partner organisations and have 24 hour staff to effectively manage the site.

3.5 The application comes before Committee for consideration as it has been "called in" at the request of Councillor Loraine Rossati and due to the fact the applicant is Stevenage Borough Council.

4. PUBLIC REPRESENTATIONS

- 4.1 This planning application has been publicised by way of a site notice and neighbour notification letter. Thirty two objections have been received from the occupiers of Nos. 1, 1A, 3, 5, 7, 8, 11, 16, 18, 20, 22, 26, 28, 30, 32, 34, 36, 37, 39, 43, 44, 50, 52, 54, 56, 58 and 60 Brick Kiln Road, 132 Bude Crescent and 12 Newlyn Close on the following grounds:
 - Plans and application form are inaccurate, incomplete and fail to show sufficient detail;
 - Inadequate consultation;
 - Property has been used as a dwelling since the care home closed;
 - Lack of information on how the property will be used;
 - Insufficient provision for on-site car parking will lead to increased parking on road;

- 8 bedrooms is too many for this property;
- Not enough shared living space would lead to cramped conditions;
- Property too far from a supermarket and other amenities given most tenants will not own a car and the local bus service is infrequent;
- The front brick wall prevents all four parking spaces being used;
- Increased noise and disturbance:
- Increase in anti-social behaviour and concern over safety of existing residents;
- Concern over who will be living in the property;
- Work is being carried out before planning permission has been granted;
- Unsuitable use of property in a road comprising mainly families and older people;
- Why is 24 hour security required?
- Highway safety concerns, especially emergency vehicle access.
- Design not compliant with HMO Licensing Requirements;
- · No details of fire safety measures
- Property not DDA compliant

5. CONSULTATIONS

5.1 Hertfordshire County Council as Highways Authority

5.1.1 Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to a condition relating to surface water drainage.

5.2 SBC Environmental Health

5.2.1 No objection, subject to informatives and advice on HMO licensing requirements.

6. RELEVANT PLANNING POLICIES

6.1 Background to the development plan

- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that the decision on the planning application should be in accordance with the development plan unless material considerations indicate otherwise. For Stevenage the statutory development plan comprises:
 - The Stevenage Borough Council Local Plan 2011-2031
 - Hertfordshire Waste Development Framework 2012 and Hertfordshire Waste Site Allocations Development Plan Document (adopted 2012 and 2014); and
 - Hertfordshire Minerals Local Plan 2002 2016 (adopted 2007).

6.2 Central Government Advice

6.2.1 A revised National Planning Policy Framework (NPPF) was published in February 2019. This largely reordered the policy substance of the earlier 2012 version of the NPPF albeit with some revisions to policy. The Council are content that the policies in the Local Plan are in conformity with the revised NPPF and that the Local Plan should be considered up to date for the purpose of determining planning applications. The NPPF provides that proposals which accord with an up to date development plan should be approved without delay (para.11) and that where a planning application conflicts with an up to date development plan, permission should not usually be granted (para.12). This indicates the weight which should be given to an up to date development plan, reflecting the requirements of section

38(6) of the 2004 Act. The NPPF and the PPG, with which Members are fully familiar, are both material considerations to be taken into account in determining this application.

6.3 Adopted Local Plan

Policy SP1: Presumption in favour of sustainable development;

Policy SP2: Sustainable development in Stevenage;

Policy SP6: Sustainable transport;

Policy SP8: Good design;

Policy IT5: Parking and access; Policy GD1: High quality design;

Policy HO5: Windfall Sites

Policy HO9: Housing Types and Sizes

Policy HC4: Existing health, social and community facilities

6.4 Supplementary Planning Documents

Parking Provision Supplementary Planning Document January 2020.

6.5 Community Infrastructure Levy Charging Schedule

6.5.1 Stevenage Borough Council adopted a Community Infrastructure Levy Charging Schedule in 2020. This allows the Council to collect a levy to fund infrastructure projects based on the type, location and floorspace of a development. This proposal is CIL liable.

7. APPRAISAL

7.1 The determining issues relate to the acceptability of the application in land use policy terms, the impact of the development on the character and appearance of the area, the impact on the amenities of neighbouring occupiers and the provision of appropriate parking to serve the property.

7.2 Land Use Policy Considerations

- 7.2.1 The principle of residential development within urban areas is set out in both national and local policy. Paragraph 61 of the National Planning Policy Framework (NPPF) 2019 requires that the planning system should deliver, inter alia, a mix of housing particularly in terms of tenure and price to support a wide variety of households in all areas.
- 7.2.2 Policy HO5 of the adopted Local Plan (2019) is for windfall housing sites and states that permission will be granted where: the site is on previously developed land or is a small, underused urban site; there is good access to local facilities; there will be no detrimental impact on the environment and the surrounding properties; proposals will not prejudice the Council's ability to deliver residential development on allocated sites; and, the proposed development would not overburden existing infrastructure.
- 7.2.3 The application property comprises previously developed land and therefore the principle of the change of use from a care home (last lawful use) to a large HMO (8 bedrooms) is considered acceptable. In regards to criterion (d) of Policy HO5, due to the siting of the proposed development, it would not prejudice the delivery of residential development on allocated sites. In terms of criterion (e) of the aforementioned policy, due to the limited scale of the development, it would not overburden existing infrastructure. Additionally, the site has good access to the Old Town shops and services via Bridge Road to the north and Tesco Extra on the A602

- roundabout to the south. There is also a local bus service on Fairview Road. Accordingly, the site is considered to have sufficient access to local facilities.
- 7.2.4 In respect to Policy HO9 (House types and sizes) of the adopted Local Plan (2019), as the proposed development seeks to deliver smaller accommodation, it would be in accordance with this policy as it would help to balance the structural imbalances in the existing housing stock, whereby there is a lack of smaller properties in the Borough. The proposal would accord with this by providing smaller units in the form of additional HMO tenancy units.
- 7.2.5 In relation to five year land supply of deliverable housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, but the supply of specific deliverable sites should in additional include a buffer (moved forward from later in the plan period) of:
 - a) 5% to ensure choice and competition in the market; or
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during the year; or
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 7.2.6 The most up to date housing supply figures indicate that the Council is able to meet its requirements to provide a 5 year land supply as defined in the adopted Local Plan. The fact that the Council can meet its 5 year land supply of housing is thus a material consideration in the assessment of this application.
- 7.2.7 Additionally, Policy SP7 of the adopted local plan identifies that there is a need to provide 7,600 new homes within Stevenage and this policy allocates 1,950 new homes to be provided elsewhere in the Borough. Taking this into consideration, the proposed development would support the Council's ambition in delivering a number of homes which fall outside the designated sites.
- 7.2.8 Policy HC4 of the Adopted Local Plan 2019 states that the retention of existing social and community facilities will be expected unless it can be demonstrated that there is no demand or need for the facility. The care home closed in early November 2012 and has not been in use as a care home ever since. Given this, it is considered that the scheme complies with policy HC4 as the closure of the care home in 2012 demonstrates a lack of demand or need for that facility.
- 7.2.9 Planning permission was granted in February 2015 (ref. 14/00532/FP) for a change of use from a care home into an 8 bedroom HMO. This permission was never implemented and has now expired. This is also a material consideration in the determination of this application. The principle of subdivision was established under the previous planning permission and the subdivision under this proposal continues to be considered acceptable in land use policy terms.
- 7.2.10 The fact the property will be used by Stevenage Borough Council as supported accommodation for those in immediate need, prior to offering suitable permanent accommodation as part of the Council's 'Housing First' model is not, however, a material planning consideration. The proposed use of the property falls within the definition of a House of Multiple Occupation and therefore the application should be assessed on that basis.

7.3 Impact on the Character and Appearance of the Area

7.3.1 In relation to the impact on the character and appearance of the area, only minor external changes are proposed to the property, with the main noticeable change amounting to the removal of the front boundary wall and replacement block paved driveway to facilitate level access to the front entrance. It is considered this change would not unduly impact on the character and appearance of the area and would improve the usability of the driveway for off street parking. The internal alterations would not be readily perceived and the car parking and access arrangements would remain similar to the existing arrangement. In view of this, it is not considered that the change of use of the property would have an adverse impact upon the character and appearance of the area.

7.4 Impact upon Neighbouring Amenities

- 7.4.1 With regard to the impact on residential amenity, the last lawful use of the property was as a care home for the elderly. Therefore, the key is to assess if the use of the property as a large HMO would result in a significant detrimental impact on residential amenity over and above its previous lawful use. Given the previous use, it is not considered that the use of the property as an 8 bedroom HMO would be likely to worsen this.
- 7.4.2 In considering this issue, it is noted that Environmental Health has commented on the application and consider the property to be suitable to accommodate this number of bedrooms. Subject to appropriate licencing of the premises and fire protection measures being undertaken, Environmental Health are raising no objection to the use of the property as a large HMO. Furthermore, they have raised no concerns from a noise perspective. On assessment of this issue, it is not considered that there would be additional noise and disturbance over and above the previous use of the premises that would be sufficient to warrant a reason for refusal. Any noise attenuation required internally would be dealt with at the building regulations stage.
- 7.4.3 In relation to the appropriateness of the accommodation for future occupants, the rooms and accommodation are all of an acceptable size. With regard to amenity space, the property has a private rear garden area of approximately 180 sq.m, which is considered to be sufficient size for a property of this size. Under the Stevenage Design Guide (2009) a flatted development of eight units would require 80 sq.m of amenity space and thus the proposal exceeds that which would be required under the Supplementary Planning Document.

7.5 Access and Car Parking

7.5.1 With regard to car parking, the applicant has provided a drawing which shows that four cars can be parked on the existing driveway to the front of the property, which would be served by two existing dropped kerbs. The Council's Parking Provision Supplementary Planning Document adopted October 2020 (SPD) sets out that houses in multiple occupation require 0.5 spaces per tenancy unit, resulting in a requirement for four spaces. However, as the site is in Accessibility Zone 2, the Council's standards allow for a relaxation to between 50% and 75% of the maximum, which means that the Council could consider a reduction of the number of spaces to between 2 and 3. However, the SPD also goes on to state that where it can be demonstrated that parking problems exist within, or around, the proposed development site the zonal reductions may not apply and that this will be determined on a case by case basis.

- 7.5.2 Four existing off street parking spaces are available on site, therefore the proposal meets the Council's maximum adopted standards. Furthermore, the parking arrangement has been assessed by the County Council as highway authority who considers this to be acceptable and, similarly, is raising no objection on highway safety grounds. Following the demolition of the front boundary wall, additional space will be available for a fifth car to park on the driveway should that be required e.g. for Council staff.
- 7.5.3 Concerns have been raised by objectors to the application that given the size of some of the bedrooms, there is the potential for more than 8 people to live at the property. The HMO will also need to be licenced by Environmental Health, who would consider the maximum number of people who could occupy the premises. Under the 2015 application for an 8 bed HMO, Environmental Health advised the property was not suitable for more than 10 people, however they have not commented on this as part of this application.
- 7.5.4 Whilst Town Planning legislation is unable to control the number of occupants at the property, Environmental Health legislation can limit occupancy via the licence which will be required prior to occupation. The Council's Housing Development team has been advised of this. However, Town Planning legislation is able to control the number of bedrooms by the imposition of a condition attached to any grant of planning permission. With this condition in place, it would ensure that any increase in accommodation would need further planning permission and thus any implications for parking requirements would again come under the control by the Local Planning Authority.
- 7.5.5 Whilst the concerns of the objectors in respect of parking provision and access to the site are noted, it is clear from the above that the scheme is in accordance with the Council's adopted parking standards. Furthermore, the access arrangements are considered to be acceptable by the County Council as highway authority.
- 7.5.6 Secured and covered cycle parking is to be provided in the existing shed in the rear garden and is therefore considered acceptable in this regard.

7.6 Other Considerations

- 7.6.1 Concerns have been raised that the development would be out of keeping and change the character of the area; lead to an increase in crime and result in antisocial behaviour. The need for the HMO and issues of anti-social behaviour are not matters that are controlled by the planning legislation, whilst the impact upon the character and appearance of the area are addressed elsewhere in this report. Finally, with regard to the issue of crime the rear garden of the property is enclosed and secured by fencing and replacement external doors are to be installed.
- 7.6.2 It is also worth noting that the property will be managed by Stevenage Borough Council, which has to meet regulations in terms of managing issues such as antisocial behaviour. Management of the HMO will be delivered by an existing 24 hour security provision that is currently in operation at various Council managed sites across the town, which will be expanded to cover this property. The office will be staffed to meet support requirements, rather than an ongoing 24 hour provision.
- 7.6.3 The existing arrangements for the storage and collection of waste and recycling as per the previous care home use will remain and therefore the proposal is acceptable in this regard. Refuse / recycling storage is shown at the side of the property.
- 7.6.4 In terms of neighbour consultation, a site notice was displayed opposite the site and all adjoining properties were sent a consultation letter in accordance with Article 15

- of the Development Management Procedure Order (as amended). Therefore, the Council has met its statutory duty in terms of the level of consultation which has been undertaken.
- 7.6.5 With regards to the information submitted with the application, national validation requirements were met with the submission of the application form, site location plan, existing and proposed plans. Other required supporting information is at the discretion of the Local Planning Authority. In this instance, additional background information was sought from the Council's Housing Development team and published on the website.
- 7.6.6 The Planning Authority was made aware that works were taking place inside the property prior to the determination of the application. On investigation, it was established with the Housing Development team that the works did not constitute development requiring planning permission and as such, could be carried out without the consent of the Planning Authority. In terms of determination of the application, it is being considered by Members of the Planning Committee due to the fact the Council is the applicant. This is in accordance with The Town and Country Planning General Regulations 1992.

Community Infrastructure Levy

7.6.7 As indicated above, the Council adopted CIL on 1 April 2020 and the CIL Charging Schedule specifies a payment for new floor space in line with the following rates (plus appropriate indexation):

Development Type	CIL Rate (£ per square meter)	
	Zone 1: Stevenage Central, Stevenage	Zone 2: Everywhere else
	West Urban Extension and North of Stevenage	
	Extension	
Residential		
Market housing	£40/m ²	£100/m ²
Sheltered housing	£100/m²	
Extra care	£40/m²	
housing		
Retail development	£60/m²	
All other development	£0/m²	

- 7.6.8 CIL is a non-negotiable charge. The exact charge will be determined by the Council's CIL officer after an application has been granted in accordance with the CIL Charging Schedule and the Community Infrastructure Levy Regulations 2010 (as amended). Opportunities for relief or exemption from the CIL charge exist and will be taken into account in the calculation of the final CIL charge.
- 7.6.9 CIL replaces the need for S106 agreements to specify financial and/or land contributions for non-site-specific infrastructure projects. This allows infrastructure to be planned on a borough-wide scale rather than on a site-by-site basis as mitigation against the impacts of individual proposals. A CIL Form 1: Additional Information has been submitted with the application. This proposal would be CIL liable.

8. CONCLUSIONS

- 8.1 The proposed change of use is considered to be acceptable in land use policy terms and would not harm the character and appearance of the area or the amenities of adjoining premises. Furthermore, the development would accord with the Council's adopted car parking standards and is considered to be acceptable in highway safety terms. Accordingly, it is recommended that planning permission be granted.
- 8.2 As such, the proposed development is in accordance with the Policies specified in the adopted Local Plan (2019), the Council's Car Parking Standards SPD (2012), the NPPF (2019) and PPG (2014).

9. RECOMMENDATIONS

- 9.1 That planning permission be GRANTED subject to the following conditions:-
- 1 The development hereby permitted shall be carried out in accordance with the following approved plans:

2020/32/01; 2020/32/02; 2020/32/03

REASON:- For the avoidance of doubt and in the interests of proper planning.

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON:- To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

The building works required to implement this permission shall be carried out only between the following times:

0730 to 1800 Mondays to Fridays 0830 to 1300 Saturdays And not at all on Sundays and Bank Holidays.

The hours specified relate to activities which are audible at the site boundary.

REASON:- To satisfactorily protect the residential amenities of nearby occupiers and the operation of adjoining businesses.

4. The on-site parking spaces indicated on the approved drawing 2020/32/01 shall be provided prior to the first use of the premises hereby permitted and permanently maintained thereafter.

REASON:- To ensure that adequate parking provision is made to serve the proposed development in the interests of highway safety.

- 5. The use of the premises shall be as an 8 bed House in Multiple Occupation only. **REASON:-** To ensure that there is no intensification of the use of the premises leading to additional parking pressures in the locality to the detriment of pedestrian and highway safety.
- Prior to the first occupation arrangements shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

REASON:- To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

INFORMATIVES

1. Community Infrastructure Levy

Stevenage Borough Council adopted a Community Infrastructure Levy (CIL) Charging Schedule at Full Council on 27 January 2020 and started implementing CIL on 01 April 2020.

This application may be liable for CIL payments and you are advised to contact the CIL Team for clarification with regard to this. If your development is CIL liable, even if you are granted an exemption from the levy, please be advised that it is a requirement under Regulation 67 of The Community Infrastructure Levy Regulations 2010 (as amended) that CIL Form 6 (Commencement Notice) must be completed, returned and acknowledged by Stevenage Borough Council before building works start. Failure to do so will mean you risk losing the right to payment by instalments and a surcharge will be imposed. NB, please note that a Commencement Notice is not required for residential extensions if relief has been granted.

Stevenage's adopted CIL Charging Schedule and further details of CIL can be found on the Council's webpages at www.stevenage.gov.uk/CIL or by contacting the Council's CIL Team at CIL@Stevenage.gov.uk.

- 2 Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website: http://www.hertfordshire.gov.uk/services/transtreets/highways/ or by telephoning 0300 1234047.
- Parking and Storage of materials: The applicant is advised that all areas for parking, storage, and delivery of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website: https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx or by telephoning 0300 1234047.
- You are advised to contact the Council's Environmental Health department on env.health@stevenage.gov.uk or 01438 242908 / 242916 with regards to obtaining the relevant HMO licence.

Pro-active statement

1. Planning permission has been granted for this proposal. Discussion with the applicant to seek an acceptable solution was not necessary in this instance. The Council has therefore acted pro-actively in line with the requirements of the National Planning Policy Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

10. BACKGROUND DOCUMENTS

- 1. The application file, forms, plans and supporting documents having the reference number relating to this item.
- 2. Stevenage Borough Council Supplementary Planning Documents Parking Provision adopted October 2020.
- 3. Stevenage Borough Local Plan 2011-2031 adopted 2019.
- 4. Hertfordshire County Council's Local Transport Plan 4 adopted May 2018.
- 5. Responses to consultations with statutory undertakers and other interested parties referred to in this report.
- 6. Central Government advice contained in the National Planning Policy Framework February 2019 and Planning Policy Guidance March 2014.