

**Meeting** Executive  
**Portfolio Area** Environment and Climate Change  
**Date** 12 July 2022



## CONSULTATION ON TWO ARTICLE 4 DIRECTIONS TO REQUIRE CHANGES OF USE FROM CLASS E(g)(i) (OFFICES AND CLASS E(g)(iii) (LIGHT INDUSTRIAL) TO CLASS C3 (RESIDENTIAL) TO OBTAIN PLANNING PERMISSION

### KEY DECISION

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## 1 PURPOSE

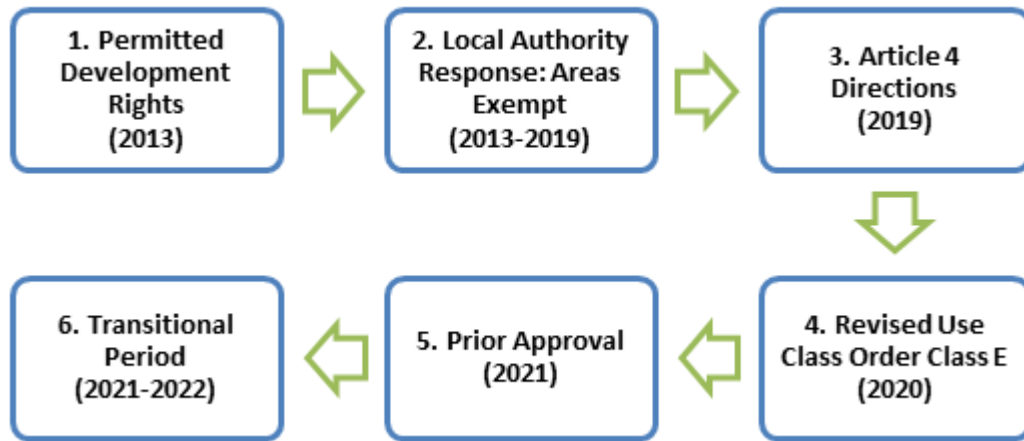
- 1.1 To seek Members' approval of, and consult upon the making of, two revised Article 4 Directions to remove the permitted development rights in relation to changes of use from office and light industrial uses to residential use in Gunnels Wood and Pin Green.

## 2 RECOMMENDATIONS

- 2.1 That the proposed Article 4 Directions, and the areas they will cover (as detailed in Appendix C and D), be approved.
- 2.2 That consultation be agreed on the making of the Article 4 Directions under Article 4 (1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), to remove permitted development rights in relation to changes of use from Use Class E(g)(i) and E(g)(iii) to Use Class C3 (as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)).

- 2.3 That following a minimum of 28 days consultation on the serving of the notice of the Directions, the Executive receive a further report in order to decide whether to confirm the Article 4 Directions.

### 3 BACKGROUND



#### *Initial Government Reforms*

- 3.1 In May 2013, the Government announced a series of planning reforms to make the process easier to secure residential development, through “permitted development rights”. A permitted development right is the carrying out of certain types of work or development, without needing to apply for planning permission. Various changes of use could be made without the need for a formal planning consent. The most prominent of these was from office, commercial and employment use (previous Use Class B1) to residential use (Use Class C3).
- 3.2 The impact of the 2013 Government arrangements was to create a significant loss in employment space across many local authority areas of the country. The key implications of this net loss included:
- Constraining growth;
  - Forcing businesses to relocate;
  - Limiting overall performance and productivity of businesses;
  - Limiting the attractiveness of Stevenage and Hertfordshire as a place to invest; and
  - Inhibiting good placemaking.

#### *Local authority response to early reforms*

- 3.3 As a response to these reforms, many local authorities across the country began to designate areas to protect against the loss of office, commercial and employment space to residential areas. This was achieved through two main methods:
- Areas exempt from the office to residential change of use permitted development right 2013 – where any proposals to change use from B1 office to C3 residential would remain subject to a full planning application

(of the initial designated areas, 13 areas within the Gunners Wood Employment Area in Stevenage were included). These remained in force until May 2019.

- Imposing Article 4 Directions on additional areas in which the local authority deemed worthy of additional protection from change of use from office, commercial and employment to residential. Local authorities had until May 2019 to ensure appropriate Article 4 Directions were in place to replace any areas exempt from the office to residential change of use permitted development right.

#### *Article 4 Directions*

- 3.4 An Article 4 Direction is a Direction under Article 4 of the General Permitted Development Order by which a local planning authority can bring within planning control certain types of development, or changes of use, which would normally be “permitted development” (i.e. not require an application for planning permission). Article 4 Directions are made when the character of an area of acknowledged importance would be threatened.

#### *More recent Government Reforms*

- 3.5 On 1 September 2020, the Government made a series of changes to the “Use Classes Order”, which categorises different types of building uses for planning purposes such as applications to change the use of a building [BD3]. Table 1 provides a summary of how uses have been reclassified.
- 3.6 The Government has argued that the main driver of change for this has been the need to enable a repurposing of buildings on high streets and town centres. The new “Class E” allows for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having several uses taking place concurrently or by allowing different uses to take place at different times of the day. Changes to another use, or mix of uses, within this class will not require planning permission.
- 3.7 From 1 September 2020 onwards, if a building or other land is being used in a way falling within Class A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés) or B1 (business) then it will be treated as though it is being used for a purpose specified in the new Class E. Change of use to another use within Class E will be allowed without the need for planning permission.
- 3.8 New rules allowing commercial premises to be converted into homes were announced on 31 March 2021, as part of a package of measures to revitalise high streets and town centres [BD4]. The new homes will be delivered through a simpler “prior approval” process instead of a full planning application and will be subject to high standards, ensuring they provide adequate natural light and meet space standards.
- 3.9 The Government has introduced legislation for England to bring forward this right to use prior approval from 1 August 2021. The right allows for local

consideration by the local planning authority of specific planning matters through the prior approval process.

- 3.10 Any such prior approval proposals will be determined by the local planning authority and, depending on the scale of the proposal, could be subject to Member oversight and approval.

#### *Transitional Period*

- 3.11 As a transitional measure until 31 July 2021, the previous Use Class Order was kept in force relative to permitted development.
- 3.12 Government consulted on proposals to include the change of use of Class E floorspace to residential as permitted development, and the Government confirmed that this new permitted development right would be introduced from 1 August 2021.
- 3.13 Transitional arrangements for existing Article 4 Directions, such as the ones in Stevenage, which restrict the conversion of offices to residential use (under Class O of the General Permitted Development Order) were also outlined; those that remained in place on 31 July 2021 would continue to have effect on equivalent development (i.e. the conversion of offices and light industrial under Class E(g)(i) and E(g)(iii) to Class C3 residential use) until 31 July 2022.

#### *The need to have up to date Article 4 Directions*

- 3.14 Although the new legislation has been in force from 1 August 2021, local authorities were given a maximum of 12 months “transitional period” to ensure that Article 4 Directions are in place that cover targeted, rather than blanket, areas of the local authority area. This is to ensure that control can be retained over those areas or elements of permitted development the local authority seeks to protect from change of use from commercial and employment to residential use.
- 3.15 This means that the current Article 4 Directions in Stevenage, which are protecting our employment areas from residential conversions, are due to expire on 31 July 2022. There is a risk that proposals after this date will be subject to planning applications for change of use; the consultation planned from 20 July 2022 means that the revised Directions carry some weight before they are confirmed. Officers within the Planning Policy and Development Management teams in the Planning & Regulation Unit have been fully briefed on the proposed revised sites to which the Directions will apply and the weight which consultation carries from 20 July 2022.

Use	Use Class (until 31 August 2020)	Use Class (from 1 September 2020)
<b>Shops</b>	A1	E
<b>Financial &amp; Professional Services</b>	A2	E
<b>Food &amp; Drink (mainly on the premises)</b>	A3	E
<b>Business (office, research &amp; development and light industrial process)</b>	<b>B1</b>	<b>E</b>
<b>Non-residential institutions (medical or health services, crèches, day nurseries and centres)</b>	D1	E
<b>Assembly and Leisure (indoor sport, recreation or fitness, gyms)</b>	D2	E
<b>Non-residential institutions (education, art gallery, museum, public library, public exhibition hall, places of worship, law courts)</b>	D1	F1
<b>Shop no larger than 280 sq. m (Selling mostly essential goods and at least 1km from another similar shop); community hall, outdoor sport / recreation area, indoor or outdoor swimming pool, skating rink</b>	A2	F2
<b>Public House, wine bar, drinking establishment</b>	A4	Sui Generis (or unique uses)
<b>Hot Food Takeaway</b>	A5	Sui Generis (or unique uses)
<b>Cinema, Concert Hall, Bingo Hall, Dance Hall, Live music venue</b>	D2	Sui Generis (or unique uses)

Table 1: Summary of Use Class Order Changes (September 2020)

### *Impact of Recent Government Reforms on Stevenage*

- 3.16 Officers sought legal advice in 2021 and any Article 4 Directions made prior to the changes to the Use Classes Order in September 2020 remain valid; they will continue to ensure that buildings remain within their existing designated planning class.
- 3.17 The Government released a consultation in December 2020, titled “Supporting housing delivery and public service infrastructure” [BD5]. This consultation set out the Government’s intention to introduce a new national permitted development right to create new homes through the change of use of Commercial Business and Service “Class E” uses; and through amending permitted development rights for public service infrastructure including a faster application process for these types of development.
- 3.18 The Council, in its response to this consultation in January 2021 [BD6], had several concerns, including:
- Impact on the Town Centre and wider Stevenage;
  - Increased demands on infrastructure;
  - Impact on housing standards;
  - Economic impact; and
  - Impact on democracy and local planning decisions.
- 3.19 This consultation was followed by the 31 March 2021 announcement of the new “prior approval” arrangements regarding permitted development rights, effective from 1 August 2021.

### *Consequences of not extending existing Article 4 Directions for Stevenage*

- 3.20 If we were to leave our existing Article 4 Directions to expire and therefore cease to exist, the consequences for Stevenage would potentially match some of the concerns outlined in the Council’s response to the Government consultation in January 2021. This includes:
- A risk of creating towns that lack in local shops, facilities and services;
  - An increased need for longer journeys, contrary to the objectives of sustainable development and the aspirations of the Stevenage Borough Local Plan [BD1]; and
  - Large scale units such as supermarkets or office blocks could be converted to residential use, without securing Section 106 contributions and therefore more affordable homes. This would mean the Local Plan targets for affordable housing not being met as well as loss of important revenue to reinvest in Stevenage.

### *Report to Executive, July 2021*

- 3.21 Officers presented to Executive on 14 July 2021 regarding the imminent transition from the old Use Class to the new and the subsequent effects that it would have on the employment areas in the Town [BD2]. It was resolved,

amongst other resolutions, ‘...that the lobbying activities of the Council for retention of the protection afforded by the Article 4 Directions (including lobbying for the support of the Hertfordshire LEP and Hertfordshire Growth Board) be concentrated and based on the Borough’s New Town heritage of separation of residential / commercial land uses, which has not changed since the original Article 4 Directions were granted’.

#### *Revised Article 4 Directions*

- 3.22 In response to the changes, the Council is proposing to implement two revised Article 4 Directions to remove these permitted development rights again, and allow for local policies, which seek to protect existing employment uses, to be considered.
- 3.23 However, rather than a “blanket Direction”, we are identifying specific properties that are currently operating as a Use Class E(g)(i) or E(g)(iii) in order to apply the Article 4 Directions to the smallest possible area.
- 3.24 Implementing an Article 4 Direction is a three stage process:
- The Direction is made;
  - Consultation is undertaken for 28 days;
  - Then the Direction is confirmed.
- 3.25 This Executive Report seeks approval to consult on the making of Article 4 Directions to remove the permitted development rights relating to E(g)(i) (offices) and E(g)(iii) (light industry) to C3 (residential) use.

## **4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

**Recommendation 2.1: That the proposed Article 4 Directions, and the areas they will cover (as detailed in Appendix C and D), be approved.**

- 4.1 If confirmed, the Article 4 Directions would cover individual buildings in the Employment Areas of Gunnels Wood and Pin Green, as identified in Appendix C and D.

#### *Existing Article 4 Directions for Stevenage*

- 4.2 Guidance relating to the current Article 4 Directions for Stevenage can be found at: <https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/article-4-directions>
- 4.3 Stevenage currently has three Article 4 Directions in force, which remove permitted development rights for changes of use from office (previous Use Class B1a) and light industrial (previous Use Class B1c) to Use Class C3 (residential), as well as requiring planning permission for change of use within the residential Use Class C.
- 4.4 The Article 4 Directions were made on 15 June 2017 and were confirmed on 21 December 2017. These are as follows:

- Change of use from Light Industrial to Residential – only applies to Gunnels Wood and Pin Green Employment areas [Appendix A] – came into force on 15 June 2018.
  - Change of use from Office to Residential – only applies to Gunnels Wood and Pin Green Employment areas [Appendix B] – came into force on 30 May 2019.
  - Houses in Multiple Occupation (HMOs) – requires planning permission to be granted for changes of use from C3 (residential) to C4 (small HMO).
- 4.5 For the purposes of this report, the Article 4 Direction relating to Houses in Multiple Occupation is not under consideration and remains in force.
- 4.6 The Article 4 Direction is not a ban on changes of use to residential; it is a requirement that such changes of use must have planning permission from the Borough Council.
- 4.7 The principle aim of these Directions is to remove these permitted development rights, and allow for local policies, which seek to protect existing employment uses, to be applied to proposals for changes of use from office and industrial to residential dwellings, to ensure employment uses are protected across the town.
- 4.8 The Stevenage Borough Local Plan (2019) continues to be part of the development plan which benefits from the statutory presumption in section 38(6) of the Planning and Compulsory Purchase Act 2004: *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.
- 4.9 The new Use Class “E” will be a material consideration when considering any planning application for development which falls into that Use Class.

#### *Revised Article 4 Directions for Stevenage*

- 4.10 The revised Article 4 Direction relating to change of use from light industrial to residential [Appendix C] would replace the existing Article 4 Direction [Appendix A].
- 4.11 The revised Article 4 Direction relating to change of use from office to residential [Appendix D] would replace the existing Article 4 Direction [Appendix B].
- 4.12 In order to ensure a targeted approach to the revised sites to which Article 4 Directions apply, officers surveyed both Gunnels Wood and Pin Green Employment Areas to determine the Use Classes of the businesses and those premises identified as being appropriate for the Article 4 Directions.
- 4.13 The Planning Policy Team have therefore ensured that a targeted, reasonable area be covered in line with the requirements of Government. As such, the Article 4 Directions apply to individual identified premises as opposed to the “blanket” Direction that was previously in force.
- 4.14 The Planning Policy team sought legal advice in May 2022 to confirm the correct wording of both sets of Article 4 Directions.



- 4.15 Not implementing these Directions would mean valuable employment uses could be lost to residential use without the Borough Council having any control over this.
- 4.16 As outlined in paragraphs 3.2, 3.18 and 3.20, there are clearly a wide range of consequences and negative impacts if the Council were to simply allow the existing Article 4 Directions to expire.

#### *Planning Policy Considerations*

- 4.17 As demonstrated through the Stevenage Borough Local Plan [BD1] and as highlighted in the Executive Report in July 2021 [BD2], there is already a shortage of employment land being provided within the town. Our evidence identifies a need for 20–30ha of employment land to be provided over the plan period.
- 4.18 The Plan allocates seven new employment sites within the Borough, providing just under 20ha of employment land (including intensification of existing uses and committed sites) to meet these needs. However, with the lack of land available, we are potentially relying on neighbouring local authorities to meet the shortfall. This makes it crucial that we protect all existing employment uses in order not to exacerbate this situation.
- 4.19 Communications with commercial property agents locally support this approach. Many have raised concerns about the lack of available sites for new businesses to take up, with many enquiries having to be passed on to neighbouring authority areas that do have the ability to accommodate them.
- 4.20 The Stevenage Borough Local Plan already identifies sufficient sites to meet the Borough's housing needs within the plan period, in sites it considers are suitable and sustainable for residential. As such, allowing these unrestricted changes of use to take place could upset the balance between homes and jobs.
- 4.21 Providing an appropriate balance between homes and jobs is a key part of the planning process to maintain a sustainable community. It is in line with the Council's Community Strategy, which seeks to maximise opportunities for economic growth, alongside the provision of new homes. It is also a core focus of the Hertfordshire Local Economic Partnership (LEP), with their Strategic Economic Plan identifying Stevenage as a major economic growth area. A loss of employment sites to residential use could severely limit economic growth within the town and work against sustainability objectives by forcing residents to commute longer distances to work.
- 4.22 As well as protecting the level of employment provision within the town, the location of the sites also needs to be considered. The original masterplan for Stevenage specifically separated employment uses from other (potentially conflicting) uses, such as housing. Gunnels Wood and Pin Green are now successful designated employment areas, with Gunnels Wood being the largest in Hertfordshire and accommodating a number of international businesses and corporate headquarters.
- 4.23 Allowing residential uses into these areas is something many businesses have strongly objected to in the past. The amenity of residents of these new

homes would likely be affected by the issues that arise from employment uses such as noise, lighting, HGV access and adverse visual impacts. Complaints could lead to businesses being subject to tighter environmental or operational, thus making the Employment Areas a less attractive option for existing and new occupiers, potentially resulting in a domino effect of businesses vacated the area.

- 4.24 In general terms, the Employment Areas are less sustainable for residential use. They do not have good access to local amenities (such as shops, schools, healthcare services, infrastructure, open spaces, etc), and would be severed from other residential communities. They are also likely to be issues around the provision of private amenity space, over-looking, parking provision and wider issues over the quality of development provided. Conversions are unlikely to provide the high-quality homes that we would want for our residents.
- 4.25 Residential land values are generally significantly above those for industrial and warehousing uses. Allowing these changes of use to remain unrestricted, therefore, offers a significant financial incentive to property owners to convert what might otherwise be perfectly acceptable employment premises into residential use.
- 4.26 The Stevenage Borough Local Plan sets out detailed policies relating to Gunnels Wood and Pin Green, protecting them as designated Employment Areas by only allowing employment (and ancillary) uses in these locations. It is essential that these local policies are not undermined by a change in legislation nationally that does not take into account local circumstances and would not be in the best interests of the local economy and the community. There are industrial buildings that would benefit from regeneration, and potentially intensification, but it is crucial that they remain in employment use.

*Support from Hertfordshire LEP and Hertfordshire Growth Board*

- 4.27 The Hertfordshire LEP have provided a letter of support [BD7], which, as well as providing full support for the revised Article 4 Directions proposed, includes supporting reference to the many economic opportunities the town has to offer, the global level industries the town supports and emerging economic frameworks the LEP are involved in developing, alongside the Council.
- 4.28 The Hertfordshire Growth Board have provided a similar letter of support [BD8].

**Recommendation 2.2: That consultation be agreed on the making of the Article 4 Directions under Article 4 (I) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended), to remove permitted development rights in relation to changes of use from Use Class E(g)(i) and E(g)(iii) to Use Class C3 (as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)).**



4.29 The Town and Country Planning (General Permitted Development) (England) Order 2015 sets out the statutory requirements for introducing an Article 4 Direction. In line with this, notice of the Directions will be;

- Published in the local newspaper;
- Displayed by two site notices in each employment area, two within Gunnels Wood and two within Pin Green;
- Sent to the occupiers and owners of all affected businesses within Gunnels Wood and Pin Green;
- Made available to view at the Customer Service Centre, the town's two libraries and the Council's website (along with a copy of the Directions);
- Sent to both the Secretary of State and Hertfordshire County Council (along with a copy of the Directions).

4.30 It is intended that public consultation will begin on 20 July 2022 (in line with publication dates for the local press) and will run for 28 days until 17 August 2022.

4.31 The draft notice of Directions is available in Appendix E and F. A copy of the Directions is contained within Appendix C and D. Members are requested to approve both of these documents (Appendix C and D) for public consultation.

**Recommendation 2.3: That following a minimum of 28 days consultation on the serving of the notice of the Directions, the Executive receive a further report in order to decide whether to confirm the Article 4 Directions.**

4.32 A minimum 28 day notice period is required when implementing Article 4 Directions.

4.33 A 12-month notification period was used on the previous Article 4 Directions in 2017 and was designed to ensure that the impact of any financial challenge is mitigated. Being as these Directions will apply to premises already covered by the current Directions, it is unlikely that there will be any financial implications on owners or occupiers.

- 4.34 As such, the Article 4 Directions, if confirmed, would come into effect on 1 October 2022.
- 4.35 To confirm any Direction, authority will be sought from Executive. A report is scheduled to come back to Executive in September 2022 to feed back the results of the consultation and for Members to decide whether to confirm the Directions, considering the representations made.
- 4.36 There is a risk that proposals from 1 August 2022 to 30 September 2022 will be subject to planning applications for change of use on sites identified; the consultation planned from 20 July 2022 means that the revised Directions carry some weight before they are confirmed. Officers within the Planning Policy and Development Management teams in the Planning & Regulation unit have been fully briefed on the proposed revised sites to which the Directions will apply.

## **5 IMPLICATIONS**

### **Financial Implications**

- 5.1 Assuming there is 28 days notification of the Directions, there should be little opportunity for challenge resulting in any financial compensation.
- 5.2 Other than staff costs in terms on both consulting upon and reporting the Directions, the principal cost will be staff time processing the any planning applications for these changes of use, which will be un-chargeable. The expected number can be met within existing resources within Planning.

### **Legal Implications**

- 5.3 Once adopted, the Article 4 Directions will remove the permitted development rights in relation to changes of use from Use Class E(g)(i) and E(g)(iii) to Use Class C3 (as defined in the Town and Country Planning [Use Classes] Order 1987, as amended).
- 5.4 Legal advice has been sought in 2021 and 2022 regarding Article 4 Directions in Stevenage.

### **Risk Implications**

- 5.5 There is a risk that proposals from August to September 2022 will be subject to planning applications for change of use on identified sites; the consultation planned from 20 July 2022 means that the revised Directions carry some weight before they are confirmed. Officers within the Planning Policy and Development Management teams in the Planning & Regulation unit have been fully briefed on the proposed revised sites to which the Directions will apply.
- 5.6 There are potential risks of not having Article 4 Directions in place, that have been highlighted within this report. These include:
- Constraining growth.
  - Forcing businesses to relocate.
  - Limiting overall performance and productivity of businesses.
  - Limiting the attractiveness of Stevenage as a place to invest.

- A risk of creating towns that lack in local shops, facilities and services.
- Local Plan targets for affordable housing not being met as well as loss of important revenue to reinvest in Stevenage.

### **Policy, Environmental and Climate Change Implications**

- 5.7 The consequences of not maintaining the existing Article 4 Directions in Stevenage include an increased need for longer journeys, contrary to the objectives of sustainable development, climate change and the wider aspirations of the Stevenage Borough Local Plan.

### **Planning Implications**

- 5.8 The Planning & Development Committee met on 22 June 2022 and were presented with a summary of the proposed changes to the Article 4 Directions regarding office and light industrial use. No substantive comments or objections were raised by the Committee.
- 5.9 Once confirmed, the Article 4 Directions will remove the permitted development rights in relation to changes of use from Use Class E(g)(i) and E(g)(iii) to Use Class C3 (as defined in the Town and Country Planning [Use Classes] Order 1987, as amended). Instead, planning permission will be required for these changes of use. Local Planning policies will be used to assess any resulting planning applications.

### **Economic Implications**

- 5.10 An absence of any required size limits for development secured through permitted development rights to change use from any “Class E” building could have some serious impacts on the economy of the borough. This would risk, for example, large scale supermarkets or office blocks being converted to residential use, creating many dwellings without any Section 106 contributions and affordable homes; thus, risking the borough falling short of affordable housing targets as well as loss of important revenue to reinvest in the town.
- 5.11 The latest set of permitted development rights and prior approval process, if sites were left with less protection, would only serve to place additional pressure on local businesses as they continue to recover from the impact of the COVID-19 pandemic as businesses are moved on by landlords seeking to profit from higher residential values.
- 5.12 There could be a potential loss of income for local authorities if developers commence large scale delivery based on schemes that have progressed via permitted development rights, instead of submitting proper applications that can be assessed against the Local Plan, scrutinised and implemented to ensure more sustainable delivery and outcomes for local residents and workers.

### **Other Implications**

- 5.13 The Council’s response to the Government consultation “Supporting housing delivery and public service infrastructure” included the potential impact on democracy and local planning decisions.

- 5.14 The Council was of the view that the proposals to introduce wide ranging permitted development rights to allow the change of use of important town centre and employment uses to residential, would cause an undermining of democracy and local planning decisions.

**Equalities and Diversity Implications**

- 5.15 An Equalities Impact Assessment (EqIA) has been completed to assess the consultation process and the proposal to implement the Article 4 Directions [BD9].

**APPENDICES**

- A Current Article 4 Direction for change of use from Light Industrial to Residential (Gunnels Wood and Pin Green Employment Areas)
- B Current Article 4 Direction for change of use from Office to Residential (Gunnels Wood and Pin Green Employment Areas)
- C Revised Article 4 Direction for change of use from Light Industrial to Residential (Gunnels Wood and Pin Green Employment Areas)
- D Revised Article 4 Direction for change of use from Office to Residential (Gunnels Wood and Pin Green Employment Areas)
- E Notice of Article 4 Direction for change of use from Light Industrial to Residential (Gunnels Wood and Pin Green Employment Areas)
- F Notice of Article 4 Direction for change of use from Office to Residential (Gunnels Wood and Pin Green Employment Areas)

## BACKGROUND DOCUMENTS

- BD1 Stevenage Borough Local Plan, 2011-2031  
<https://www.stevenage.gov.uk/documents/planning-policy/stevenage-borough-local-plan/stevenage-borough-local-plan.pdf>
- BD2 Stevenage Borough Council Executive (14 July 2021) Item 5: Review of Article 4 Directions and Employment Sites in Stevenage  
<https://democracy.stevenage.gov.uk/documents/s28776/Item%205%20-%20Article%204%20Directions%20Report.pdf>
- BD3 Use Classes Order (September 2020)  
[https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)
- BD4 New Government Arrangements from August 2021 (March 2021) [New freedoms to support high streets and fast track delivery of schools and hospitals across England introduced today - GOV.UK \(www.gov.uk\)](#)
- BD5 Government Consultation; Supporting Housing Delivery and Public Service Infrastructure (December 2020) [Supporting housing delivery and public service infrastructure - GOV.UK \(www.gov.uk\)](#)
- BD6 Government Consultation: Supporting Housing Delivery and Public Service Infrastructure – Stevenage Borough Council Response (January 2021)
- BD7 Hertfordshire LEP Letter of Support for Revised Article 4 Directions in Stevenage (June 2021)
- BD8 Hertfordshire Growth Board Letter of Support for Revised Article 4 Directions in Stevenage (June 2021) \*Unattributed\*
- BD9 Article 4 Directions: Equalities Impact Assessment