



### Impact on Vulnerable Adults and Children

1. Summary of Impact: No impact
- 

### Corporate Policy

1. Policy Status: Not Applicable
  2. BBB Priority: Vibrant, Thriving Town Centres, Regeneration
- 

### Financial

1. Cost of proposal: No upfront cost, but potential for loss of application fees. Depending on how the consolidated PD rights affect existing Article 4 Directions, there may be a requirement to re-make existing Directions, which would incur costs (staff resources, consultation costs)
  2. Ongoing costs: As above, there is potential for ongoing loss of planning application fees.
  3. Budget head/performance centre: N/A
  4. Total current budget for this head: N/A
  5. Source of funding: N/A
- 

### Personnel

1. Number of staff (current and additional): N/A
  2. If from existing staff resources, number of staff hours: N/A
- 

### Legal

1. Legal Requirement: The Town and Country Planning (General Permitted Development) Order 2015 (as amended).
  2. Call-in: Not Applicable
- 

### Procurement

1. Summary of Procurement Implications: N/A
- 

### Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
- 

### Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A
2. Summary of Ward Councillors comments: N/A

### 3. COMMENTARY

#### Background

- 3.1. Changes to the UCO were introduced in September 2020. The Development Control Committee report of 24 September 2020<sup>1</sup> provides further details on these changes. The introduction of the new 'Class E' Use Class, which consolidated several previous Use Classes into one, was the most significant change to the UCO. Class E includes the following uses:

***Class E. Commercial, Business and Service***

*Use, or part use, for all or any of the following purpose:*

*(a) for the display or retail sale of goods, other than hot food, principally to visiting members of the public;*

*(b) for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises;*

*(c) for the provision of the following kinds of services principally to visiting members of the public; (i) financial services, (ii) professional services (other than health or medical services), or (iii) any other services which it is appropriate to provide in a commercial, business or service locality;*

*(d) for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public;*

*(e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner;*

*(f) for a creche, day nursery or day centre, not including a residential use, principally to visiting members of the public;*

*(g) for (i) an office to carry out any operational or administrative functions, (ii) the research and development of products or processes, or (iii) any industrial process; being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*

- 3.2. Paragraph 3.66 of the 24 September 2020 Development Control Committee report notes:

*“Transitional provisions have been put in place to retain the effect of PD rights based on the former Use Classes (prior to 1 September 2020). A building or use will continue to be subject to any PD rights that it was entitled to on or before 31 August 2020. These transitional provisions will remain in place until 31 July 2021 when new, revised PD rights will be introduced. These provisions also apply to relevant Article 4 Directions. It is unclear what the impact of any future amendments to the GPDO will mean for existing Article 4 Directions, specifically whether they will continue to apply or whether there will be a process of reconfirming them to align with the new UCO.”*

- 3.3. On 3 December 2020, the Ministry of Housing, Communities and Local Government (MHCLG) launched a consultation entitled 'Supporting housing delivery and public service infrastructure'<sup>2</sup>. This consultation includes details of the 'new, revised PD rights' referred to in the 24 September 2020 Development Control Committee.

- 3.4. The consultation is split into three components:

---

<sup>1</sup> <http://cdslbb/documents/s50083418/PLANNING%20LEGISLATION%20UPDATE%20-%20PERMITTED%20DEVELOPMENT%20RIGHTS%20AND%20CHANGES%20TO%20THE%20USE%20CLASSES%20ORDERP.pdf>

<sup>2</sup> Available from: <https://www.gov.uk/government/consultations/supporting-housing-delivery-and-public-service-infrastructure/supporting-housing-delivery-and-public-service-infrastructure>

- Supporting housing delivery through a new national permitted development right for the change of use from the Commercial, Business and Service use class to residential;
  - Supporting public service infrastructure through the planning system; and
  - Consolidation and simplification of existing permitted development rights.
- 3.5. The consultation introduction sets out the broad rationale for the consultation proposals. MHCLG consider that the proposed changes are necessary in order to immediate changes to provide greater planning certainty and flexibility to ensure that the planning system can effectively contribute to some of the immediate challenges facing the country, including supporting the economic future of our high streets and town centres, supporting jobs, and the faster delivery of schools and hospitals.
- 3.6. With regard to high streets and town centres, the consultation identifies that structural changes in consumer spending and retailing, such as the shift to online shopping over recent of years, has had a significant impact on high streets and town centres. The COVID-19 pandemic has magnified these problems. MHCLG state that the aim of the proposed new PD rights is to “*support our town centres and high streets in adapting to these changes to become thriving, vibrant hubs where people live, shop, use services, and spend their leisure time.*”
- 3.7. It is also stated that:

*“Where there is a surplus of retail floorspace, quality residential development will help diversify and support the high street. It will create new housing opportunities including for those who will benefit from close proximity to services, such as the elderly and those living with disabilities. It will also make effective use of existing commercial buildings, bring additional footfall from new residents, and assist in the wider regeneration of town centre and other locations.”*

Supporting housing delivery through a new national permitted development right for the change of use from the Commercial, Business and Service use class to residential

- 3.8. The consultation proposes a new national PD right for the change of use from the new Commercial, Business and Service use class to residential use. MHCLG consider that the new PD right would help support economic recovery, housing delivery and the regeneration of our high streets and town centres.
- 3.9. PD rights already exist for some of the uses within Class E to change to residential use; however, the proposed new PD right goes significantly beyond the majority of these existing PD rights as the consultation does not propose a size limit, unlike most existing PD that allows change to residential use which is capped at 150sqm. The consultation does not propose an exemption within conservation areas, unlike most existing PD which is exempt in such areas where some external alterations are permitted as part of the PD right. The consultation does propose an exemption for areas of outstanding natural beauty, the Broads, National Parks, areas specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981, and World Heritage Sites.
- 3.10. The consultation recognises that some retail and office buildings in particular could be a substantial size, and therefore result in a significant number of new homes, but considers that the impacts of this would be managed through prior approvals. PD rights do not apply to development that is screened as requiring an Environmental Impact Assessment.
- 3.11. The proposal suggests that all of the uses within Class E would have permitted development to change to C3 residential - this would include uses such as restaurants, indoor sports facilities and creches, which have not previously been permitted to change to residential through PD.

- 3.12. The protections in respect of pubs, including those with an expanded food offer, theatres, and live music venues, all of which are outside of Class E, continue to apply and a requirement for a full planning application will remain for the change of use to or from such uses.
- 3.13. Use Class E applies everywhere in all cases, not just on the high street or in town centres. In order to benefit from the right premises must have been in Class E use on 1 September 2020 when the new use classes came into effect.
- 3.14. The consultation sets out that MHCLG *“want to ensure this new right is carefully balanced, allowing for appropriate residential development but also ensuring there is opportunity for local consideration of plans to mitigate any adverse impacts through prior approval. This also provides an opportunity for the community to make representations on these matters, and for their views to be taken into account by the local planning authority”*. The proposed prior approvals are as follows:
- “Similar to other permitted development rights for the change of use to residential:*
- *flooding, to ensure residential development does not take place in areas of high flood risk*
  - *transport, particularly to ensure safe site access*
  - *contamination, to ensure residential development does not take place on contaminated land, or in contaminated buildings, which will endanger the health of future residents*
- To ensure appropriate living conditions for residents:*
- *the impacts of noise from existing commercial premises on the intended occupiers of the development*
  - *the provision of adequate natural light in all habitable rooms*
  - *fire safety, to ensure consideration and plans to mitigate risk to residents from fire*
- To ensure new homes are in suitable locations:*
- *the impact on the intended occupiers from the introduction of residential use in an area the authority considers is important for heavy industry and waste management*
- 3.15. The application for prior approval would be accompanied by detailed floor plans showing dimensions and proposed use of each room, including the position of windows; information necessary for the consideration of the matters for prior approval; and an appropriate fee.
- 3.16. MCLG recognise that the proposed PD right has the potential to deliver significant numbers of quality new homes to buy or to rent. It is therefore proposed to introduce a fee per dwellinghouse, and that this is set at the current prior approval fee of £96 applied as a fee per dwellinghouse capped at a maximum of the fee for 50 homes. MHCLG consider that this fee level would not impact significantly on the costs to developers within the context of the overall costs of the development and land value uplift to be gained. If taken forward, the fee would be introduced through separate regulations at the earliest opportunity.

### *Discussion*

- 3.17. The proposed Class E to residential PD rights are of significant concern. The introduction of Class E itself, alongside the numerous PD rights introduced in recent years, already significantly undermines the plan-led system. The new proposed PD rights would have an even greater impact, and would fundamentally alter the face of high streets and local economies across the country. Further, it would mean that opportunities to secure affordable housing, funding for infrastructure and other important benefits sought by planning policy are lost. It is a knee-jerk proposal that would likely lead to the decimation of economic and retail floorspace, undermining the ability of local authorities to deliver on economic growth aspirations and causing the very problem the consultation supposedly aims to solve.

- 3.18. Despite the rhetoric in the consultation which seems to focus on 'surplus retail floorspace', the actual proposals do not provide any distinction between occupied and surplus floorspace. As residential use will most likely attract a higher land value than retail in almost all circumstances, this lack of distinction could lead to scores of occupied, successful retailers being evicted so landlords can convert premises to a more lucrative residential use.
- 3.19. Equally as concerning is the lack of any size threshold. Current retail to residential PD rights are capped at 150sqm, but the proposal would allow large retail buildings, offices, restaurants, etc (or buildings with a mix of Class E uses) to change entirely.
- 3.20. There is no locational consideration proposed, meaning that the PD right would be a blunt tool that applies equally to space in the heart of town centres, in local shopping parades and in out of town shopping areas and office locations.
- 3.21. The PD right will apply in conservation areas, although the consultation does suggest a potential requirement for prior approval of the impact of the loss of the ground floor use to residential, in recognition of the conservation value that retail frontage can bring to conservation areas. The proposed PD right poses a real threat to the quality of conservation areas and risks undermining their special qualities. The PD right should be exempt in all conservation areas if there is any allowance for external alterations. At the very least, any proposal within a conservation area (not just those at ground floor level as mooted by the consultation) should be subject to a prior approval requirement allowing assessment against relevant local conservation area policies and guidance. The architectural, historic and heritage value of buildings is not limited to the ground floor of buildings.
- 3.22. In terms of what could be done to mitigate these impacts (aside from not having the PD rights at all), the proposal should be amended so that it only applies to space that has been vacant and marketed for a period (and is therefore genuinely surplus). It should also be limited to areas outside any core retail designations as identified in a Local Plan; and should only apply to upper floors, to ensure that active frontages can continue at ground floor. A maximum size threshold should also be imposed; we suggest this should reflect the current retail to residential PD rights maximum threshold of 150sqm of floorspace (cumulatively) within a building.
- 3.23. The absence of a requirement for permitted development conversions to provide or contribute towards affordable housing, coupled with the absence of a size limit, will result in a significant loss of affordable housing that could otherwise have been secured through conventional planning applications (proposals of 10 units or more). This severely affects the Council's ability to provide housing for those individuals and families who are in acute housing need.
- 3.24. Similarly, the proposed PD rights could lead to large scale residential conversions which will place significant pressure on all types of infrastructure (e.g. transport, social infrastructure) without giving local authorities the ability to secure adequate contributions to mitigate this, e.g. through S106 and/or CIL. While permitted development is technically liable for CIL, in practice it would not be liable for any payment as an allowance is given for any existing occupied floorspace, meaning that the 'net' CIL liable floorspace for permitted development is often 0sqm.
- 3.25. The consultation proposes some prior approval requirements that are intended to be imposed; however, it is essential that further prior approval requirements are put in place if the PD rights are implemented. This should include:
- A requirement for space to be demonstrably surplus to requirements, through a requirement for premises to be vacant for a minimum of 6 months and subject to an active, meaningful marketing exercise for the duration of the vacancy period.

- A requirement to assess the impact of the loss of Class E space on any relevant Local Plan retail or employment designations, such as Town Centres or specific office locations.
- An 'agent of change' requirement which would enable the Council to assess whether the introduction of new residential uses is likely to adversely affect the existing and future operation of businesses in the area.
- A requirement to ensure high quality residential units. The consultation mentions provision of adequate natural light and fire safety measures; while this is supported, this still sets a low bar in terms of design. It is expected that minimum space standards will also apply given recent Government announcements, but ultimately we consider that there should be a prior approval requirement which defers to any local design policies/criteria to assess the design of prior approval applications. This should require proposals to address wider housing quality issues such as layout, private outdoor amenity space, sustainable design standards, number of units per core, etc.
- A requirement for any proposal for 10 units or more to provide affordable housing. To ensure that the prior approval is streamlined, this could be secured by submission of a Unilateral Undertaking (based on a standardised UU template) which commits to providing the required quantum and tenure split. The prior approval test could nuance this by deferring to Local Plan policies on quantum and tenure.
- Introducing a mechanism to ensure that permitted development would make a meaningful contribution to infrastructure, given that receipt of CIL on such proposals is unlikely. New residential use will generally place a much greater strain on infrastructure than existing commercial uses, therefore it is important that funding can be sought to fund necessary infrastructure improvements.

3.26. The consultation does not set out if or how existing Article 4 Directions would continue to apply, which is particular issue for Bromley's Business Improvement Areas where Article 4 Directions currently remove the office to residential PD rights (and is also an issue for the designated office clusters where Article 4 Directions have been proposed but not yet confirmed). Removal of the Directions could have significant implications for these areas. MHCLG must clarify this urgently. If existing Directions are to be removed, then there should be a delay in introducing the new PD rights to give local authorities ample time to introduce new Directions; there is precedence for this with the past introduction of light industrial to residential PD rights.

3.27. Any procedural requirements relating to the new PD rights should allow the local authority to request relevant information related to the prior approval category and refuse prior approval where this is not provided. For example, this could relate to a noise assessment in relation to any 'agent of change' prior approval requirement.

3.28. As with the recently introduced Part 20 PD rights, the automatic consent after 56 days should be removed. Where a decision on a prior approval application is not made within 56 days, applicants could then appeal against non-determination.

3.29. Unlike a standard planning application, prior approval applications are not assessed against Development Plan policy under section 38(6) of the Planning and Compulsory Purchase Act 2004. However, the Development Plan (the Bromley Local Plan and the London Plan) may be a relevant material consideration where it is relevant to a particular prior approval category; for example, Local Plan policies which aim to prevent adverse impacts on the local road network may be relevant when assessing the transport and highways impacts of the development.

#### Supporting public service infrastructure through the planning system

3.30. The consultation proposes to amend existing PD rights to allow schools, colleges and universities, hospitals and prisons to expand and adapt their buildings as they respond to changing demands and ways of working, without the need to seek planning permission.

- 3.31. The existing PD right for extensions of schools, colleges, universities, and hospitals is subject to size limits, limiting extensions or additional buildings to no more than 25% of the gross floorspace of the original buildings with a maximum cap of 100sqm, or 250sqm in the case of schools. It also restricts the height of new buildings to 5 metres. The consultation proposes to amend the right to allow such uses to expand their facilities by up to 25% of the footprint of the current buildings on the site at the time the legislation is brought into force, or up to 250sqm, whichever is the greater. This would allow greater flexibility for those sites that have enlarged or developed additional buildings over time and flexibility for those premises with a smaller footprint. To provide further flexibility, it is also proposed that the height limit is raised from 5 metres to 6 metres, excluding plant on the roof, except where it is within 10 metres of the boundary or curtilage.
- 3.32. The consultation confirms that school playing fields will continue to be protected from development. The existing PD right to allow the erection, extensions and expansion of schools, colleges, universities and hospitals has a condition exempting development on land used as a playing field in the past 5 years from development. The proposals to expand this right would retain this condition, meaning that playing fields will continue to be exempt.
- 3.33. The consultation adds that MHCLG also want to speed up local decision making on planning applications for larger hospital, school, further education college and prison development, including development on new sites. The consultation sets out proposals for a faster planning application process for these types of development, amending the statutory determination period for development within scope of the modified procedure to 10 weeks. This will require local planning authorities to prioritise these decisions over other applications for major development.
- 3.34. Further measures to assist with assessment through the modified process are suggested, including a new planning application form for developments that fall within scope of the modified process. The consultation proposes to shorten the statutory publicity and consultation periods for applications; and would introduce a requirement to notify the Secretary of State when a valid planning application for these developments is received, to allow for effective engagement, support and monitoring of progress.
- 3.35. The consultation notes that local planning authorities will be expected to prioritise the negotiation and finalisation of any section 106 agreements associated with these types of development.
- 3.36. No amendments to the Fees Regulations for these public service infrastructure developments are suggested. MHCLG recognise that the process for determination would be faster, but they do not think it is necessary for the planning application fee to change. The requirements for consultation and publicity will still apply to these applications and local planning authorities will still be required to undertake their usual duties when consulting on public service infrastructure projects, in line with existing legislation.
- 3.37. A faster process requires a clear definition of the developments that will be within scope of the new process, in order that local planning authorities and the Secretary of State can clearly identify and prioritise them. The consultation proposes a two-tier approach based on the scale and definition of the proposed development:
- Scale: proposals for development would fall within scope of the modified process if they are “major development” carried out on a site having an area of 1 hectare or more, and/or involve the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; involve one of the categories of development described in below; and would currently be subject to a 13-week statutory determination period.
  - Categories of ‘major development’ which will be subject to the modified process:
    - hospitals

- schools and further education colleges
- prisons, young offenders' institutions, and other criminal justice accommodation

3.38. The new application process would not apply to EIA development. It will also be limited to those public service infrastructure projects which are principally funded by government.

### *Discussion*

3.39. In principle, measures to improve delivery of important social infrastructure of the types proposed is supported. However, the proposals risk introducing a significant strain on resources when such applications are received, both directly, due to the need to prioritise these applications; and indirectly, as it may require resources to be diverted from elsewhere, which may result in other deadlines being missed, unnecessary appeals, etc.

3.40. With regard to the proposed amendments to PD rights, the protection of playing fields is supported but protections should be extended to explicitly incorporate Green Belt, MOL and any locally defined open space.

### Consolidation and simplification of existing permitted development rights

3.41. The consultation seeks views on the proposed approach to the consolidation and simplification of some existing permitted development rights, including those which provide for change of use between use classes. The requirement for this stems from the recent changes to the UCO.

3.42. The consultation sets out four categories of changes:

- Category 1 - the right is no longer required. Example – Part 3, Class D shops to financial and professional, as both of these uses are now within Class E
- Category 2 - the right is unchanged by the amendments to the Use Classes Order and therefore no amendment is necessary. Example – Part 3, Class L small HMOs to dwellinghouse and vice versa.
- Category 3 - the right may be replaced by the new proposed permitted development right from the Commercial, Business and Service use class to residential. Example – Part 3, Class O offices to dwellinghouses
- Category 4 - the right requires detailed consideration. There are several rights that may fall into this category. Example – Part 3, Classes A, B, C, E, F, J, JA, and K which allow the change of use to one or more uses now within the Commercial, Business and Service use Class. A range of individual rights allow for the change of use from, for example, hot food takeaways, betting shops and pay day loan shops, to uses that are now within the Commercial Business and Service use class. These individual rights differ in some details, such as size limits, matters for prior approval and exclusions such as for listed buildings. Recognising the driver for greater flexibility behind the broader use class, there is potential to consolidate and simplify these, and possibly other rights, into one or more rights. In doing so there could then be some changes to the detail of the limitations in respect of size and matters for prior approval etc.

3.43. While the focus will primarily be on Part 3 Change of use, other Parts of the Order raise similar issues: in particular Part 4 in respect of temporary use, and Part 7 in respect of non-domestic extensions and alterations.

3.44. MHCLG's stated aim is to simplify and rationalise rights where possible, by revoking unnecessary rights and merging where appropriate. They intend that this approach would result in a more accessible set of rights, but note that in doing so a number of issues arise:

- There may be rights under category 4 where the scope of the right is broadened, for example to allow for the change of use to the Commercial, Business and Service use class rather than an individual use within it, such as a shop. Or may similarly be broadened by providing for the change of use from a greater range of uses, such as from the Commercial, Business and Service use class.
- There may be other cases where rights that provide for limited physical works to support the change of use are merged with others that do not, and the provision for physical works falls away.
- The review or merger of rights with no or differing size limits may result in a broader or more restricted right.
- Where individual rights that either do or do not apply in conservation areas or other protected land are merged MHCLG will consider the balance of safeguards to be provided, and whether that could mean that some rights would in future apply in protected land.
- MHCLG will seek to preserve the safeguards in respect of certain uses listed in article 3 (6) of the Use Classes Order as 'no class specified' (i.e. Sui Generis uses), such as public houses. MHCLG would therefore not look to a permitted development right to grant permission and instead continue to require a planning application for the change of use to or from such uses.
- Uses within the previous D2 Assembly and Leisure use class are now found in either the Commercial, Business and Service use class E, Local Community use class F2 or listed as being in no class specified (Sui Generis). Rights that previously allowed for the change of use to any use within the D2 assembly and leisure use class may therefore in future be more restrictive in allowing change to uses within the Local Community use class F2.
- It is proposed that no changes are made in respect of the scope of the recently introduced Part 20 PD rights to construct new homes: extending buildings upwards, and demolition and rebuild, in order to give these PD rights time to establish and for impacts to be assessed before any changes are made.

### *Discussion*

- 3.45. While the principle of consolidating PD rights is accepted, MHCLG should take this opportunity to undertake a full-scale review of the impacts of PD rights to date, before rushing headlong into a new set of damaging PD rights (particularly the proposed Class E to residential PD rights discussed above). This review should assess whether PD rights are the best holistic option for delivering high quality housing and ensuring that economic growth can continue to be successfully delivered. It should encompass the entirety of the GPDO, including a review of householder Part 1 PD rights and other Part 3 PD rights including C3 to C4 (residential to HMO) PD rights.
- 3.46. Notwithstanding this, the category 1 and 2 proposals are supported, as these are simple consequential amendments. In relation to the category 3 proposals, any consolidation/changes to existing PD rights should take into account the significant potential adverse impacts that may arise as noted in our response to the Class E to residential proposals above.
- 3.47. With regard to category 4, we suggest that any rationalisation of prior approval requirements should default to any highest requirement in any given category, e.g. in relation to size thresholds, information requirements, etc. Where a PD right states that development is not permitted if not in a certain use before a specified date, this date should be retained in any consolidated/amended PD right.
- 3.48. After undertaking the changes outlined, it is essential that any amended GPDO is subject to meaningful consultation. The proposed methodology is fairly clear but it is impossible to comment fully without seeing actual proposed amended PD rights.

#### 4. POLICY IMPLICATIONS

- 4.1 The proposed PD right has the potential to significantly undermine policies in the Development Plan, most notably retail and economic policies and designations. Development Plan policies are material to the determination of prior approval applications where the policies relate to relevant prior approval categories.
- 4.2 An Article 4 Direction can be put in place to remove PD rights, as noted in the report. There are several existing Directions which remove PD rights which the consultation proposes to review. The consultation is silent on how any consolidated and/or amended PD rights will affect existing Article 4 Directions.
- 4.3 In addition, further Article 4 Directions may be expedient following the introduction of amended PD rights. In particular, changes to size limits and conservation area exemptions may necessitate Directions in areas which were previously not considered expedient because the impacts of PD were likely nil or negligible.

#### 5. FINANCIAL IMPLICATIONS

- 5.1 The proposed prior approval fee is likely to be less than an equivalent planning application, but the level of resources needed to assess the application are likely to be similar to a full planning application.
- 5.2 Depending on how the consolidated PD rights affect existing Article 4 Directions, there may be a requirement to re-make existing Directions, which would incur costs (staff resources, consultation costs).

#### 6. LEGAL IMPLICATIONS

- 6.1 The proposed PD rights would be introduced via an amendment to the Town and Country Planning (General Permitted Development) Order 2015 (as amended).
- 6.2 There will be specific considerations for individual prior approval applications, as they come forward in future, for example which Development Plan policies are relevant material considerations and could apply to the determination.
- 6.3 An Article 4 Direction can be put in place to remove PD rights, as noted in the report. The statutory requirements for putting in place an Article 4 Direction are set out in Town and Country Planning (General Permitted Development) Order 2015 (as amended). The consultation is unclear about whether existing Directions will continue to apply, or whether the process for making Article 4 Directions will change as part of the consolidation work that MHCLG propose.

Non-Applicable Sections:	IMPACT ON VULNERABLE ADULTS AND CHILDREN PERSONNEL IMPLICATIONS PROCUREMENT IMPLICATIONS
Background Documents: (Access via Contact Officer)	The Town and Country Planning (General Permitted Development) Order 2015 (as amended).  Development Control Committee report of 24 September 2020 - PLANNING LEGISLATION UPDATE – PERMITTED DEVELOPMENT RIGHTS AND CHANGES TO THE USE CLASSES ORDER, available from: <a href="http://cdslbb/documents/s50083418/PLANNING%20LEGISLATION%20UPDATE%20-%20PERMITTED%20DEVELOPMENT%20RIGHTS%20AND%20CHANGES%20TO%20THE%20USE%20CLASSES%20ORDERP.pdf">http://cdslbb/documents/s50083418/PLANNING%20LEGISLATION%20UPDATE%20-%20PERMITTED%20DEVELOPMENT%20RIGHTS%20AND%20CHANGES%20TO%20THE%20USE%20CLASSES%20ORDERP.pdf</a>