



**Article 4 Direction to remove permitted development rights for change of use from Use Class E to residential in the District Centres and Local Shopping Centres**

**Key Decision No. NH S030**

**CABINET MEETING DATE  
(2020/21)**

24 January 2022

**CLASSIFICATION:**

Open

**WARD(S) AFFECTED**

Brownswood, Cazenove, Clissold, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Homerton, Hoxton East and Shoreditch, King's Park, Lea Bridge, London Fields, Shacklewell, Springfield, Stamford Hill West, Stoke Newington, Victoria, Woodberry Down

**CABINET MEMBER**

Councillor Guy Nicholson, Deputy Mayor and Cabinet Member for Housing Supply, Planning, Culture and Inclusive Economy

**KEY DECISION**

Yes

**REASON**

Affects two or more wards

**GROUP DIRECTOR**

Ajman Ali, Group Director of Neighbourhoods and Housing

## **1. CABINET MEMBER'S INTRODUCTION**

- 1.1. The Council recognises the importance and significance of employment land and floorspace, including shops for creating and supporting jobs, enabling economic growth and inclusive regeneration in the Borough. Hackney's town centres are of vital importance in meeting the needs of local communities, creating vibrant social places and supporting a thriving local economy.
- 1.2. The Council actively seeks to protect and improve commercial, business and service land and floorspace. This is facilitated in part through the planning process by planning policies protecting viable and important retail and employment land and floorspace, and maintaining a range and balance of retail, employment and community uses in the Borough's town centres through the planning process.
- 1.3. Changes to permitted development ("PD") rights imposed on local communities by central Government over recent years now allow for various changes between different use classes without the need for planning permission. The Council in response confirmed several Article 4 Directions ("A4Ds"), including an Office to Residential A4D (2016) and a Retail and Residential A4D (2016). These A4Ds removed the PD rights in defined areas, and meant that Planning applications were required for any change of use of a building or any land within its curtilage from an office or retail use to a dwelling house. This allowed the Council to manage any potential future change of use to residential.
- 1.4. The Government in 2020 amalgamated several different use classes, Class A1-A3 (retail), Class B1 (offices, research and development and light industrial) and some Class D (leisure and community) into a new Class E (commercial, business and services). In addition, with effect from 1 August 2021, a change to the PD rights allowed Class E to change to Class C3 dwelling house without the need for Planning permission.
- 1.5. These changes mean that the existing A4Ds will not be enforceable - the Retail to Residential ceased to exist on 31 July 2021, and the existing Office to Residential A4D will fall away on 31 July 2022. Landowners and applicants wishing to use the latest PD right will have to apply for prior approval under which only certain conditions can be considered. This process does not allow for a full assessment by the Council that a planning application does.

- 1.6. The impact could be significant, resulting in the potential loss of up to 7990 jobs<sup>1</sup>, and 350 commercial units<sup>2</sup> from the District and Local centres as well as break up existing local shopping areas. It will hinder Hackney's ability to meet the borough-wide assessed need to support a growing community, for 34,000sqm of new retail and leisure floorspace across the borough<sup>3</sup>.
- 1.7. As such, this report seeks approval to issue a non-immediate Article 4 Direction (A4D) to withdraw the PD rights for change of use of a building and any land within its curtilage from a use falling within Class E.
- 1.8. I commend this report to Cabinet.

## **2. GROUP DIRECTOR'S INTRODUCTION**

- 2.1. This reports seeks Cabinet approval to make an A4D to withdraw the permitted development rights for change of use of a building and any land within its curtilage from a use falling within Class E of Schedule 1 to the Use Classes Order, to a use falling within Class C3 (dwellinghouses) of that Schedule, contained in Class MA, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 ("GPDO"). The Direction will apply to all the district town centres and the local town centres within the borough. It will be a non-immediate Direction so a one year notification period has passed and it is proposed that the Article 4 Direction is confirmed in January 2023.
- 2.2. The A4D will mean that a planning application would be required for any potential future (a) change of use of a building and any land falling within Class E (commercial, business and service) to a use falling within Class C3 (dwellinghouse). This action is required so that the Council can manage any future use in town centres through the planning process.
- 2.3. This action is required so that the Council can ensure that the town centres are kept viable and vibrant and are able to serve the needs of Hackney's communities, and provide employment opportunities. It means that any potential future change of use of offices, shops, restaurants and other community uses that fall within Class E to residential are managed through the planning process, in line with Council objectives to support the growth of jobs and business in the Borough, and ensure a sustainable balance of land uses.

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<sup>1</sup> IDBR 2021

<sup>2</sup> GOAD Stamford Hill and Stoke Newington Reports 2021

<sup>3</sup> GVA Town Centre and Retail Assessment 2017

### **3. RECOMMENDATION**

**Cabinet is recommended to:**

- 3.1. To approve the making of a non-immediate Article 4 Direction (A4D) (Appendix 1) to withdraw the permitted development (“PD”) rights granted by Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (‘the GDPO’) for changes of use from Class E to a dwellinghouse (Class C3) in Hackney’s District Centres and Local Shopping Centres (as shown in Appendix 2).**
- 3.2. To delegate authority to the Director of Legal and Governance Services to carry out all publicity/consultation arrangements set out in paragraph 10.1-10.2 of this report and to disapply paragraph 1(1)(c) of Schedule 3 of the GPDO (not to serve individual owner or occupier notice of the A4D because their number makes individual service impracticable).**

### **4. REASONS FOR DECISION**

- 4.1. The Council considers that the PD right allowing change of use from Use Class E (commercial, business and services) to Use Class C3 (dwellinghouse) without planning permission may constitute a threat to the economy, jobs and amenities of the Borough and would be prejudicial to the proper planning of the Borough, in particular the Council’s ability to prevent the loss of uses which contribute to the wider strategic aims for the area.**
- 4.2. This A4D is considered necessary because the Council’s employment and retail planning policies are based on robust evidence which establishes a need to protect employment and commercial uses to ensure the vitality and viability of Hackney’s economy. The permitted development rights would undermine the operation of these policies and may impact negatively on the provision of employment spaces, commercial spaces and jobs in the borough.**

### **5. DETAILS OF ALTERNATIVE OPTIONS CONSIDERED AND REJECTED**

- 5.1. The alternative option is not to approve the Article 4 Direction. This has been rejected because the Council would be unable to protect retail, employment and community floorspace in accordance with adopted planning policies and this would negatively impact on the provision of shops and jobs in the areas which were previously given exemption**

through A4Ds.

- 5.2. The making of an immediate A4D was rejected because it could result in potential compensation implications for the Council under sections 107 and 108 of the Town and Country Planning Act 1990. It will also allow the Council to take into account consultation responses before the A4D is confirmed and made effective.

## **6. BACKGROUND**

- 6.1. In September 2020, changes to the Use Classes Order came into effect. Class A1-A3 (retail), Class B1 (offices, research and development and light industrial) and Class D (leisure and community) were amalgamated into a new Class E and new Class F. Changes of use between the uses listed in Class E are allowed and are no longer considered development.
- 6.2. Class E contains the following provisions:
- E(a) Display or retail sale of goods, other than hot food'
  - E(b) Sale of food and drink for consumption (mostly) on the premises
  - E(c) Provision of:
    - E(c)(i) Financial services,
    - E(c)(ii) Professional services (other than health or medical services), or
    - E(c)(iii) Other appropriate services in a commercial, business or service locality
  - E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
  - E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
  - E(f) Creche, day nursery or day centre (not including a residential use);
  - E(g) Uses which can be carried out in a residential area without detriment to its amenity:
    - E(g)(i) Offices to carry out any operational or administrative functions,
    - E(g)(ii) Research and development of products or processes
    - E(g)(iii) Industrial processes.
- 6.3. On 1st August 2021, the government introduced legislation for England for a new Use Class E to residential PD right. The legislation allows all uses within Class E (commercial, business and service) to change to Use Class C3 residential under a new Class MA in the General Permitted Development Order (GPDO).

- 6.4. Under the new Class, applicants do not need to submit a planning application, but a Prior Approval application under which only certain conditions prescribed by law can be considered. The Prior Approval process contains conditions including natural daylight, sustainability of conservation areas, incompatibility in industrial areas and impact on registered nurseries/health centres. There is a size limit of 1,500sqm and the premises must have been in commercial use for 2 years and vacant for three continuous months prior to an application for prior approval.
- 6.5. The new permitted development right for Class MA replaces Class O and part of Class M as they previously related to the change of use of office and retail premises to dwellings. Consequently existing A4Ds in Hackney that controlled retail change in the exemption area - Retail to Residential A4D (A1 and A2 to residential), and Flexible town centre uses A4D - fell away on 31st July 2021. The GPDO legislation provides that existing Article 4 Directions which protect office floor space (previously B1a) from being converted to residential (C3) will remain in effect until 31 July 2022. From that point, the Hackney Office to Residential Article 4 Direction falls away. The council's other Article 4 Directions remain in place and unaffected by the changes.
- 6.6. The National Planning Policy Framework (NPPF) sets out direction around Article 4 Directions:

*The use of Article 4 directions to remove national permitted development rights should:*

- *where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)*
  - *in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)*
  - *in all cases, be based on robust evidence, and apply to the smallest geographical area possible.*
- Planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so. (SoS for MHCLG Written Statement 1 July 2021)*

- 6.7. It should be noted that the withdrawal of PDR does not mean that planning consent would not be granted for any of the changes of use

outlined above, but an A4D would enable the Council to weight up the impacts of any proposed change of use and on the vitality, viability and amenity of the area in line with the borough-wide Local Plan.

- 6.8. Coronavirus has had a damaging impact on the economy in Hackney, with residents put out of work, and the borough's many small businesses increasingly at risk. The town centres in Hackney are particularly important as the economy moves into its post-covid recovery. The strengths of Hackney's existing strong local offer in town centres and smaller commercial areas should be built on, especially as, in the near future at the very least, residents are more likely to be working from home, shopping more locally and staying at home during holidays.
- 6.9. This report outlines the reasons for the geographical areas covered by the proposed Article 4 Direction. As required by the NPPF, the report justifies why, in the areas outlined, an Article 4 direction is necessary to "avoid wholly unacceptable adverse impacts" on Hackney's district and local town centres.

## **7. Policy Context and Impacts**

- 7.1. The making of this A4D is considered to be in compliance with the National Planning Policy Framework (NPPF) which states that A4Ds should be used where it "*is necessary to avoid wholly unacceptable adverse impacts*".
- 7.2. The London Borough of Hackney has an established hierarchy of town centres, vital for Hackney's communities, providing services, shops and employment opportunities. Hackney has two Major Centres, three District Centres and 14 Local Shopping Centres. This A4D concerns the District and Local Shopping Centres. A separate A4D before Cabinet is concerned with Hackney's CAZ, City Fringe, Growth Corridors and Major Town Centres. The areas this A4D covers are:

- Stoke Newington District Centre
- Finsbury Park District Centre
- Stamford Hill District Centre
- Broadway Market Local Shopping Centre
- Chatsworth Road Local Shopping Centre
- Dunsmure Road Local Shopping Centre
- Green Lanes Local Shopping Centre
- Hackney Downs Local Shopping Centre
- Hoxton Street Local Shopping Centre
- Kingsland Road Local Shopping Centre
- Lauriston Road Local Shopping Centre

- Lower Clapton Road Local Shopping Centre
- Manor House Local Shopping Centre
- Oldhill Street Local Shopping Centre
- Stoke Newington Church Street Local Shopping Centre
- Stoke Newington Road Local Shopping Centre
- Upper Clapton Road Local Shopping Centre
- Well Street Local Shopping Centre
- Wick Road Local Shopping Centre

- 7.3. The NPPF states that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. In the London Plan, town Centres are a key spatial priority, providing access to a range of services and enabling all parts of London to make a greater contribution to London's economic success. The role of local and neighbourhood centres is to provide convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.
- 7.4. The district and local centres of Hackney are fairly evenly distributed across the borough, giving access to a range of shops. The district centre of Stamford Hill has good comparison and convenience shopping. The District Centre of Stoke Newington has a strong retail and leisure provision, and offers convenience shopping. Finsbury Park provides retail shops, restaurants and services.
- 7.5. The local centres provide convenience shopping options for residents, and in some centres more specialist shopping options as well. Hackney has a diverse retail character with a strong emphasis on small and independent shopping. It is important to ensure these centres are able to continue to provide a diverse range of services, including everyday essential services, to meet local needs.
- 7.6. Hackney's town centres are an important hub for local civic, cultural and community life. They play an important role in helping to retain local money in the local area, and in turn, support small businesses and provide local jobs and training opportunities. The town centres identified in this A4D are an essential source of jobs for the community. There are 3,948 people employed within the registered businesses of Hackney's local centres. A further 1,137 people are employed through businesses in Stamford Hill, 2,730 in Stoke Newington and 175 in the Hackney part of Finsbury Park<sup>4</sup>. Retail spaces and activities provide the majority of employment opportunities but the District Centres of Finsbury Park, Stamford Hill and Stoke Newington, and the local centres of Hoxton Street, Well Street, Upper and Lower Clapton also offer workspace

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<sup>4</sup> IDBR 2021 Geocoded data



provision, and these opportunities for local employment in a broader field are supported by the Council.

- 7.7. The Council's retail and employment planning policies in the Local Plan are based on robust evidence which establishes a need to protect employment and commercial uses to ensure the vitality and viability of Hackney's economy. The proportion of retail uses and other town centre uses that must be maintained in the town centre areas are set out in Local Plan policies. The loss of these uses without management through the planning system could undermine the operation of the retail planning policies for the proper planning of the Council's area as they may inhibit the Council's ability to ensure that the District Town Centres and Local Shopping Centres retain a sufficient critical mass of retail provision, accessible by walking, cycling and sustainable transport modes. This is particularly important in the context of a growing population.
- 7.8. There is a requirement set out in LP33 for 34,000sqm of new retail and leisure floorspace by 2033. Most of this will come forward in the Central Activities Zone area and the major town centres of Dalston and Hackney Central, as is set out in Hackney's retail policies, but it will also impact on the district centres of Stamford Hill, Stoke Newington and Finsbury Park. In order to facilitate this uplift in retail and leisure floorspace, reflecting sustainable population and employment growth, the Council needs to ensure that sufficient land is available for retail, employment and community floorspace. This is currently done through the planning system, and the implementation of Local Plan policies.
- 7.9. The A4D will supersede the existing Hackney Office to Residential A4D and Retail to Residential A4D, and ensure a sustainable balance of land uses, and the protection of viable employment, commercial and community uses. This is supported from a planning perspective by the Council's Local Plan 2033 policies, and also national and regional planning policy and guidance. As such, it is considered that the Council has the policy foundation to issue the A4D.
- 7.10. The use of an A4D will maximise the protection of important retail floorspace in town centres. The A4D will safeguard amenity and ensure that the Council retains the ability to plan properly for the area. The withdrawal of these PD rights does not necessarily mean that planning consent would not be granted for any change of use, but that a full assessment of the impact of that change can be assessed.
- 7.11. Given the above, the Local Planning Authority (LPA) is satisfied that it is expedient (in accordance with paragraph (1) of article 4 of the GPDO) that development that would normally benefit from PD rights should not be

carried out unless permission is granted for it on application in accordance with the development plan (which includes the London Plan and the adopted Hackney Local Plan (LP33)), unless material considerations indicate otherwise.

### **Why a A4D is required**

- 7.12. The permitted development right allowing Class E to residential changes would prejudice the proper planning of the borough, which is supported by the NPPF and the London Plan.
- 7.13. The Local Plan sets out effective local employment and retail policies and the operation of these are undermined by the PD right and may impact negatively on the provision of employment spaces, commercial spaces and jobs in the borough.
- 7.14. The Council recognises the importance and significance of town centre uses to meet the needs of local communities throughout the Borough. The Council's planning policies seek to protect a core of retail uses, while allowing for a range of other uses (e.g. financial services, restaurants) to ensure a balanced offer.
- 7.15. To ensure that the district and local centres remain vital and vibrant, Local Plan policy sets out that the designated town centres retain a critical mass of retail provision. This is set at 55% in the district centres and 50% in the local centres. The PD right constitutes a threat to the amenities of the borough and the service that the centres can offer to the residents. The PD right would create piecemeal development in the town centres, diluting the strong offering to the community, and removing the active ground floor uses that create liveliness and interest in a town centre.
- 7.16. The Council had an existing Retail to Residential A4D covering these areas. Under Government arrangements, it fell away on 31 July 2021. Therefore, the proposed A4D will replace this A4D to reflect the new use class and the PD right. Due to the ease with which retail can now become office units and visa versa, the Article 4 Direction will remove the PD right from all uses in Class E.
- 7.17. The A4D will enable the Council to manage change, including growth of residential, and ensure physical and social infrastructure can accommodate any growth in a sustainable way. This includes ways to comprehensively bring large sites / designated sites forward.
- 7.18. The Council's commitment to the effective planning of areas across Hackney is demonstrated by the extensive engagement with stakeholders

to inform the direction and aims of the Emerging Stamford Hill Area Action Plan. The draft AAP covers the district centre of Stamford Hill and three local centres - Dunsmure Road, Oldhill Street and Upper Clapton Road.

- 7.19. The draft Stamford Hill Area Action Plan will manage existing development pressures and shape future growth in a sustainable manner. Sites for planned development have been identified supporting strategic growth plans within Hackney. The Plan provides a framework for growth which safeguards the area's unique character and will deliver real benefits to the community, particularly in terms of maximising the supply of large family homes, improving public space and public realm, providing new schools and community facilities and improving local shopping centres in Stamford Hill. The PD rights will undermine the plan and the positive impacts it brings.
- 7.20. The A4D allows the Council to implement and deliver the aims, objectives and priorities of area specific plans, as well as boroughwide strategies including the Corporate Plan (2018-2022), which builds on the strength and diverse local offerings in Hackney's town centres and smaller commercial areas, and the Inclusive Economy Strategy (2019-2025) which sets out to ensure that benefits of growth are felt across the borough, and Transport and Climate change strategies.
- 7.21. The Council has, in recent years, delivered about 98% of its housing targets, and has sufficient allocated sites to meet future targets. This housing growth will be accompanied by planned investment in infrastructure. In addition planning permission for new housing will need to meet local quality and standards that are / will be beyond the national provisions set out in the prior notification.
- 7.22. Finally, the Council's Local Plan, which was only adopted in July 2020, includes a policy that seeks affordable housing contributions either on-site or payment in lieu. Alongside the longstanding policy position of contributions from larger schemes i.e 10 residential units or more, contributions also are required for schemes proposing 1-9 units. This reflects the urban grain in Hackney where the majority of sites are small sites. On-site provision is preferable, however, financial contributions of £60,000 per unit in the City Fringe, and £50,000 per unit elsewhere in the borough has been adopted by the Council<sup>5</sup>. This policy will no longer be implementable under the new PDR, and there will also be a loss of CiL contribution.
- 7.23. The making of this A4D is considered to be in compliance with the National Planning Policy Framework (NPPF) which states that A4Ds

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<sup>5</sup> Hackney S106 Planning Contributions SPD ( July 2020)

should be used for “wholly unacceptable adverse impacts”. The A4D is also considered to be in compliance with the NPPF and London Plan policies that recognise town centres as the heart of their communities; as well as Hackney’s Local Plan 2033 (LP33) which encourages development that sustains and enhances the vitality and viability of town centres.

## **8. Equality Impact Assessment**

- 8.1. This Article 4 Direction will mean that the Council’s adopted planning policies will be applied when assessing applications for changes of use from office, retail and community to residential in the district and local town centres.
- 8.2. A full Equalities Impact Assessment (EqIA) will be undertaken to support this Article 4 Direction proposal.

## **9. Sustainability**

- 9.1. The proposed Article 4 Direction will enable the Council to continue to protect employment uses within the District Centres. The retention of office and retail floorspace in these key locations provides jobs and has an important role to play in achieving sustainable and resilient neighbourhoods by providing employment opportunities to support a growing population.
- 9.2. The proposed Article 4 Direction will also enable the Council to consider proposals against planning policies which seek to protect retail units and encourage a balanced and diverse range of uses to ensure that local residents, workers and visitors have reasonable access to a range and choice of essential local shops and services. The town centres have an important role to play in achieving sustainable neighbourhoods that are accessible utilising active travel.
- 9.3. Hackney residents, particularly those with accessibility needs, should be able to easily access town centres to visit shops and other facilities that provide for day-to-day needs.

## **10. Consultation and next steps**

- 10.1. Consultation on the A4D will comply with legal requirements. The non-immediate A4D notice will be advertised in the Hackney Gazette, on the Council website over a minimum consultation period of 21 days, and at least 2 site notices in each of the affected areas, and notification sent to the Secretary of State.

- 10.2. Following the consultation and, if necessary, review, if the A4D is confirmed at least 12 months after the date on which the notice is first published, notification will be given to the Secretary of State, and published on the Council's website, the Hackney Gazette and on site. Individual owners and occupiers will not be served with notices at either the making or the confirmation stage of the A4D.

## **11. Risk Assessment**

- 11.1. A principal concern for the Council is the liability to compensation associated with removing PD rights through an Article 4 Direction. It is for this reason that a non-immediate A4D is being proposed in this instance which involves a 12 month notification period. This notification period before the A4D comes into force removes compensation liability for the Council.
- 11.2. During the 12 month notice period, permitted development for the relevant changes of use in the identified areas would exist and landowners may be more likely to take advantage of these rights before the A4D comes into force. However this risk is considered more manageable than the potential compensation liability that would exist if the Council were to remove these PD rights with immediate effect.
- 11.3. There is also the risk that the Secretary of State cancels or modifies the A4D once confirmed. This risk has been reduced by only applying the A4D to specific designated areas.

## **12. COMMENTS OF THE GROUP DIRECTOR OF FINANCE AND CORPORATE RESOURCES**

- 12.1. There are no direct financial implications to the report's recommendations

## **13. COMMENTS OF THE DIRECTOR OF LEGAL AND GOVERNANCE SERVICES**

- 13.1. Cabinet is authorised to approve the Recommendation in paragraph 3 of this report by virtue of:

Article 13.5 of the Council's Constitution - A key decision is a Cabinet decision which is likely to

- i) Result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decisions relates, or

ii) Be significant in terms of its effects on communities living or working in an area comprising two or more wards in the area of the Council.

Article 13.6 - Key Decisions can be taken by the Elected Mayor alone, Cabinet collectively, individual Cabinet councillors and Office.

13.2. Para 53 of the NPPF says the use of Article 4 Directions to remove national permitted development rights should:

i) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre).

13.3. A non-immediate direction would allow all consultation views to be taken into account before the direction was confirmed and made effective, usually a year after it's made. It would also reduce or eliminate the likelihood of compensation being payable to affected landowners under sections 107 and 108 of the Town and Country Planning Act 1990.

13.4. Once the Direction has been made, it needs to be published and served in accordance with Schedule 3(1) of the Town and Country Planning (General Permitted Development) England Order 2015.

13.5. Once the notice has been served and published, notice needs to be given to the Secretary of State as required by Schedule 3(1)(6).

## **APPENDICES**

Appendix 1 - Proposed Article 4 Direction Notice

Appendix 2 - Map of the areas for which the Article 4 Direction is proposed

Appendix 3 - Evidence Report to support the Article 4 Direction

## **BACKGROUND PAPERS**

None

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