

Planning and Development Control
North Hertfordshire Council
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

Email Frankie.johnson@cushwake.com
[REDACTED]

Your Ref 25/00378/FP

3rd April 2025

Dear Sir / Madam

CHANGE OF USE OF FIRST FLOOR AND PARTS OF GROUND FLOOR FROM CLASS E (COMMERCIAL, BUSINESS AND SERVICE) USE TO CLASS C3 (RESIDENTIAL) USE TO PROVIDE 3NO FLATS WITH EXTERNAL ALTERATIONS TO FACILITATE THE CHANGE OF USE AT 4 STATION ROAD LETCHWORTH GARDEN CITY HERTFORDSHIRE SG6 3BH.

Cushman & Wakefield is instructed by the Department of Work and Pensions (DWP) to submit a representation to the above planning applications for change of use to residential (ref: 25/00378/FP).

Background

DWP operate the Job Centre at 4 Station Road, adjacent to the proposed development site. The application proposes the conversion of existing office space at first and second floor level to form 3 flats (Use Class C3).

The Department for Work and Pensions (DWP) is the UK's biggest public service department responsible for welfare, pensions and child maintenance policy. The DWP administrates the State Pension, range of working age, disability and ill health benefits and support to over 22 million claimants and customers and also manage fraud and any necessary investigations. Their services are provided through organisations including Jobcentre Plus, The Pension Service and the Child Maintenance Services. Jobcentre Plus assists people away from claiming benefits by placing them back into the work force. It further helps employers advertise jobs and deal with benefits for people who are unemployed or unable to work because of a health condition or disability.

The Job Centre is an important asset for DWP. The Job Centre is open 7am – 7pm Monday – Friday except for Wednesday 10am – 5pm. The Job Centre attracts a high number of visitors with a few appointments every hour throughout the day.

The introduction of residential development in such close proximity to the Job Centre is of significant concern to DWP as the proposed use will mean residential windows looking directly into the existing windows and working spaces at the eastern elevation of the Job Centre. The nature of the work undertaken at the site means sensitive, personal data is handled on a daily basis. The ability of Job Centre staff to complete daily tasks should not be impacted by the introduction of a new residential use next door.

National Planning Policy Framework (2024)

The National Planning Policy Framework was updated on 12th December 2024 and sets out the government's planning policies for England and how these are expected to be applied.

Paragraph 8 of the NPPF describes and sets out the fundamental importance of “sustainable development”, including an economic objective ‘to help build a strong, responsive and competitive economy’ and a social objective ‘to support strong, vibrant and healthy communities... with accessible services’.

Paragraph 90 states: *“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management, and adaptation. Planning policies should:*

- c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
- f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”*

Paragraph 98(d) states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should *‘ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community’*.

The protection of existing businesses from the impact of new forms of development through the “agent of change principle” is a factor that is clearly recognised as important by the government in the NPPF.

Paragraph 200 of the NPPF (2024) states that *“planning policies and decisions should ensure that new development can be integrated effectively with existing businesses...existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established... Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

Residential Amenity and Privacy

DWP is a responsible operator and operates effectively from within the communities it serves, across its national estate. It is essential for DWP to monitor and respond to any planning application that could detrimentally impact its operational sites.

The introduction of residential uses in such close proximity to existing windows of the Job Centre office, raises significant concerns of overlooking both from the proposed residents looking into the adjacent windows of the Job Centre, where sensitive public data is stored, accessed and displayed on computers during the working week, and proposed residents being affected by existing employees working next door.

The windows are approximately 7.5m apart.

Ground floor windows at the Job Centre have privacy screening, and it is likely similar will be needed at the upper floors if the proposed application is approved.

Construction Environmental Management Plan

No Construction Environmental Management Plan (CEMP) has been submitted with the application. Unrestricted access to the Job Centre is required during the working week and we request a CMP is required to ensure access can be maintained.

Conclusions

These representations set out DWP’s concerns relating to the proposal for change of use of existing office space at 4 Station Road to create new residential flats. Concerns primarily relate to the introduction of new residential use adjacent and windows looking into existing Job Centre office space where sensitive data is



handled daily. In addition, the need to ensure unrestricted access to the Job Centre is maintained during the construction period.

We ask that DWP, via Cushman & Wakefield, is made aware of any further information submitted by the applicant with adequate time provided for further review and comment ahead of any decision being made by the Council.

The established site is an important asset for DWP and provides an essential service to local residents. Any risk to the established use would impact DWP's ability to provide this service.

I would be grateful if you could confirm receipt of this representation and keep me informed of any changes to the application or additional assessment submitted. If you have any queries or need to organise a site visit, please do not hesitate to contact me.

Yours sincerely,

Frankie Johnson LRTPI

Graduate Planner

For Cushman & Wakefield on behalf of Royal Mail Group Limited