



## PLANNING STATEMENT

**Site:** 623 Blackhorse Road  
Letchworth  
SG6 1HB

**For:** Letchworth Garden City Heritage  
Foundation

**Project Ref:** 26002

**Date:** April 2026

### **Prepared by:**

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## **CONTENTS PAGE**



| <b>Section</b> | <b>Title</b>                    | <b>Page</b> |
|----------------|---------------------------------|-------------|
| 1.0            | Introduction                    | 2           |
| 2.0            | Background and Site Context     | 3           |
| 3.0            | Development Plan Considerations | 6           |
| 4.0            | Proposed Development            | 8           |
| 5.0            | Planning Assessment             | 9           |
| 6.0            | Summary and Conclusions         | 14          |

## **Plans and Documents Accompanying the Application**

|                                                          |
|----------------------------------------------------------|
| Application Form                                         |
| Planning Statement By Barker Parry Town Planning         |
| P0501-LPE Location Plan                                  |
| P0501-BPE Block Plan Existing                            |
| P0501-BPP Block Plan Proposed                            |
| P0501-ELE-A Elevations Existing & Proposed               |
| P0501-00-GL-A Ground Floor Existing Layout               |
| P0501-01/M-GL-A First Floor / Mezz Level Existing Layout |
| P0501-00-PL Ground Floor Proposed Layout                 |
| P0501-01/ML-PL First Floor / Mezz Level Proposed Layout  |

1.0 **Introduction**

1.1 This Planning Statement has been prepared on behalf of our client, Letchworth Garden City Heritage Foundation, in support of an application for full planning permission for a change of use at 623 Blackhorse Road, Letchworth, SG6 1HB.

1.2 The description of development for the proposed scheme is as follows:

*Change of use from Sui Generis Timber Merchant to flexible Class B2/B8/Eg(iii) Industrial Use.*

1.3 This Statement demonstrates that the proposed scheme complies with all relevant planning policy and guidance and constitutes sustainable development which benefits from the presumption in favour.

1.4 Section 2 of this Statement outlines the site context including relevant planning history. Section 3 provides a summary of relevant planning policy and Section 4 outlines the scheme proposal in detail. Section 5 assesses the proposals against the relevant planning policy, and the final conclusions are set out at Section 6.

## 2.0 **Background and Site Context**

### Site and Surroundings

- 2.1 The application site is a 0.4ha premises located on the south side of Blackhorse Road in Letchworth Garden City. The existing site comprises 1,464sqm of commercial floorspace predominately as open warehouse but with a small extent of ancillary office space at ground and first floor. At its principal elevation it is a two-storey, flat roofed structure predominately constructed in red brick with a section of render, behind which is the warehouse area with vaulted sawtooth roof.



Figure 1: Google Earth Image of the Site - Site indicated in red

- 2.2 The site has a secure service yard area to the rear with HGV loading door, car parking and open storage area as well as some additional car parking on the frontage. It benefits from two vehicular crossover from Blackhorse Road, one which aligns with the access down the site of warehouse to the rear yard and a second from the west side of the front parking area.



*Figure 2: Principal Elevation of the site from Blackhorse Road, showing front office area and side access to service yard*

2.3 The site is bound to the east and west by other industrial premises, to the south is the trainline beyond which is a larger area of commercial warehouse units. To the north is an area of residential development.

2.4 The site benefits from good sustainable transport links. It is located less than 200m from bus stops on Green Lane providing connection to Letchworth station.

### Planning Designations

2.5 The application site is located in a safeguarded employment area as shown on the North Hertfordshire Local Plan 2011-2031 Policies Map at Figure 3 below.

2.6 The site is not within a conservation area and there are no listed buildings in the vicinity of the site. It is within Flood Zone 1 and is also not at risk from surface water flooding.

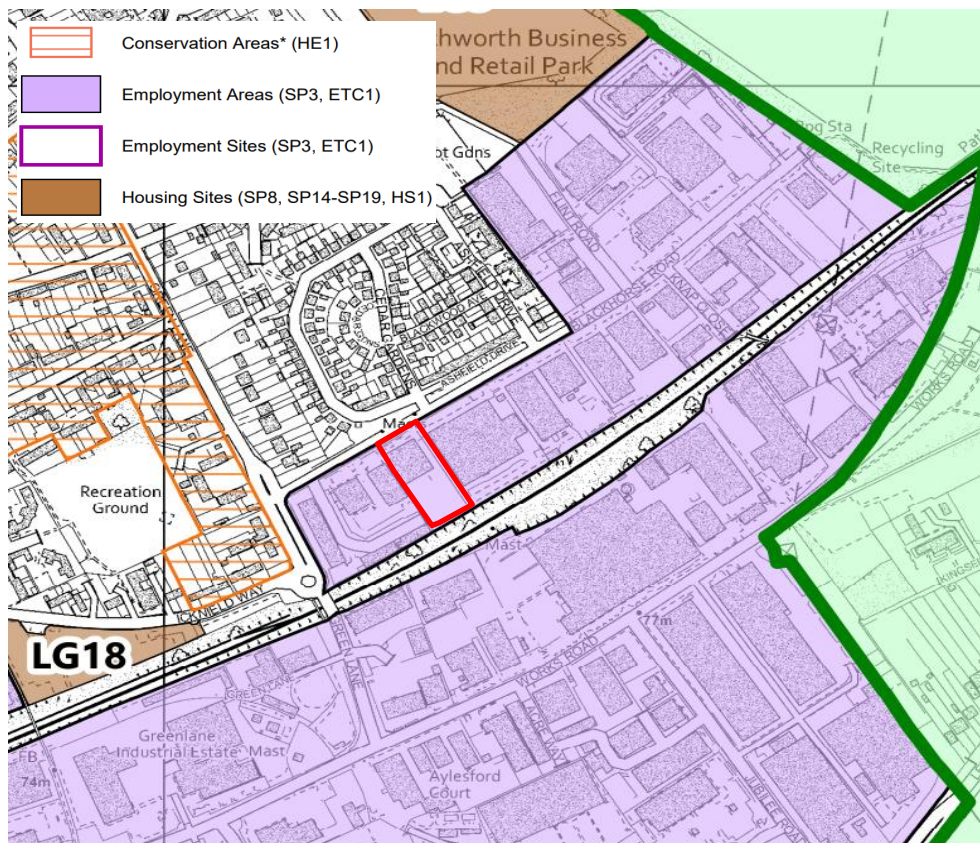


Figure 3: Extract of North Herts Local Plan Policies Map, site indicated in red

### Relevant Planning History

- 2.7 The only relevant planning history is that, on 12 December 2000, planning permission was granted for the change of use of the site from Class B2 (General Industrial) to timber merchant (LPA Ref. 00/01635/1). The site has not been subject to any applications since.
- 2.8 Following the change of use permission in 2000, the site was occupied by Hertfordshire Timber Supplies Ltd until c.2016. It was then vacant for a period before being occupied by The Wood Works, a bespoke kitchen fabricator, between 2018 until around 2024.
- 2.9 Timber merchants are a *Sui Generis* use and despite some short terms intervening uses, this is considered to remain the current lawful use of the site.

### 3.0 **Development Plan Considerations**

3.1 The North Hertfordshire Local Plan 2011-2031 was adopted on 8 November 2022. The Local Plan forms part of the Development Plan for the District, alongside Neighbourhood Plans for certain areas and the adopted Minerals Local Plan and Waste Local Plan.

#### North Herts Local Plan 2011-2031

- Policy SP1: Sustainable development in North Hertfordshire
- Policy SP2: Settlement hierarchy and Spatial Distribution
- Policy SP3: Employment
- Policy SP6: Sustainable transport
- Policy ETC1: Appropriate uses in employment areas
- Policy D1: Sustainable design
- Policy T1: Assessment of transport matters
- Policy T2: Parking
- Policy SP9: Design and sustainability

#### **Other Material Considerations**

#### National Planning Policy Framework (NPPF) (2024)

3.2 The NPPF is an important material consideration in the determination of planning applications, and it clearly sets out that Local Planning Authorities (LPAs) should take a positive approach to decision-making. Paragraph 38 states that LPAs should work proactively with applicants to secure development that improves the economic, social and environmental conditions of the area.

3.3 A presumption in favour of sustainable development lies at the heart of the NPPF. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

3.4 Further, paragraph 85 outlines that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

#### Supplementary Planning Documents (SPDs)

3.5 The following SPDs may also be considered relevant to the proposed scheme:

- Design SPD July 2011
- Vehicle Parking at new Development SPD (2011)

4.0 **The Proposed Development**

4.1 The proposed scheme comprises a change of use of the site from *Sui Generis* to flexible Class B2/B8/E(g)(iii) industrial use.

4.2 The key elements of the proposed scheme are as follows:

- Change of use of the premise from *Sui Generis* to allow Class B2, Class B8 or Class E(g)(iii) industrial uses with ancillary office space.
- Reconfiguration of Site Layout to remove open storage and re-provide car parking in new formal arrangement.
- Retention of existing singular HGV loading space.
- Provision of 9 cycle parking spaces in exceedance of policy requirements.

4.3 The application is speculative so there is no end user in mind at present, as such flexibility is sought for the type of industrial use to maximise the attractiveness of the unit to the commercial market.

## 5.0 **Planning Assessment**

### **Principle of Development**

- 5.1 Strategic Policy SP3 of the Local Plan outlines that the Council will proactively encourage sustainable economic growth, support new and existing businesses and seek to build on the District's strengths, location and offer. One mechanism for this is to Safeguard Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their employment potential.
- 5.2 The application site is located within one of these safeguarded employment areas and is therefore covered by Policy ETC1. This states that planning permission will be granted for office, research and development, industrial processes, industrial and storage and distribution uses provided:
- a) For allocated sites any relevant site-specific criteria are met; and
  - b) Any Use Class B8 development is easily accessible from the primary road network.
- 5.3 It goes on to state that planning permission for other (non-employment) uses will be granted as an exception, provided they are:
- i. Ancillary to the above uses;
  - ii. Essential to the continued operation of an established premises;
  - iii. Would bring comparable benefits to office, research and development, industrial processes, industrial and storage and distribution uses in the same location; or
  - iv. Would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time.

5.4 In this instance, the site has not formally been in industrial use for over 25 years by virtue of having a Sui Generis use. The site is also not allocated (simply designated) for new employment development. The site is easily accessible from the primary road network by virtue of having road connections through the wider employment area to Baldock Road (B656) and Letchworth Gate (A505) providing quick access onto the A1(M). As such, the proposal is appropriate in scale for the local context, is accessible by a range of transport modes and would meet needs for industrial floorspace in the local area.

4.4 The proposed change of use will therefore result in an additional industrial unit within the safeguarded employment area and is proposed to have flexibility to be occupied for light industrial processes, general industrial or storage and distribution uses with ancillary office space which fully accords with the aspirations of Policy SP3 and ETC1 of the Local Plan. The flexibility is sought as the application is speculative with no end user current in place and a permitted range of appropriate uses will maximise the attractiveness of the unit to the commercial market both now and in the future. As such, the proposal should be supported in principle.

### **Design & Sustainability**

5.5 The proposals will not result in any external alterations to the building. The only external works comprise removing the current area of open storage to the rear and formalising the car parking layout. As such it is considered that there are no material design implications arising from the proposal. The proposal is therefore appropriate for the character and appearance of the area. The existing design of the site is considered to be appropriate for the proposed return to general industrial or storage and distribution.

- 5.6 As such, the proposed scheme is considered to be acceptable in design and appearance terms and complies with Policy D1 of the Local Plan.

### Access & Parking

- 5.7 Policy T1 of the Local Plan states that Planning permission will be granted provided that development would not lead to highway safety problems or cause unacceptable impacts upon the highway network. Policy T2 of the Local Plan and the Council's Vehicle Parking at New Development SPD sets out that parking provision must have regard for the standards set out in said documents.
- 5.8 In this case, the 'Vehicle Parking at New Developments SPD' is of limited relevance as the proposal is a change of use and new built form is not proposed. Nevertheless, it is a useful starting point for understanding if adequate parking provision already existing at the site.
- 5.9 Under the SPD, the site is within Accessibility Zone 2 where 25%-50% delivery on the maximum parking standards for each relevant land use is targeted. However, some lenience should be allowed in this case given the proposal is a change of use and results in a reduction from existing car parking provision. The required and proposed provision is set out in the below table:

|                                      | Parking Standards                                                                                 | Parking Provision based on 1,464sqm gfa.    |
|--------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------|
| <b>B2 General Industrial</b>         | Cars: 1 space per 50sqm gfa<br>Cycles: 1 space per 250sqm for staff (+1 per 500sqm for visitors)  | 29 spaces<br>6 cycle spaces + 3 visitor     |
| <b>B8 Storage &amp; Distribution</b> | Cars: 1 space per 75sqm gfa<br>Cycles: 1 space per 500sqm for staff (+1 per 1000sqm for visitors) | 19.5 spaces<br>3 cycle spaces + 1.5 visitor |

|                           |                                                                                                   |                                                              |
|---------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| <b>Mixed E(g)/B2/B8</b>   | Cars: 1 space per 40sqm gfa<br>Cycles: 1 space per 500sqm for staff (+1 per 1000sqm for visitors) | 37 spaces<br>3 cycle spaces + 1.5                            |
|                           |                                                                                                   |                                                              |
| <b>Proposed Provision</b> | 60% of max parking standard<br>100% of cycle parking standard                                     | 22 existing spaces<br>9 cycle spaces for staff and visitors. |

Table 1: Parking Provision

5.10 There are presently 25-35 car parking spaces at the site in a mostly informal arrangement, as well as no cycle parking. Within this context, the proposed provision is considered to be entirely appropriate for the site. Additionally, the building currently benefits from one existing HGV loading door which is to be retained. There is not expected to be any material increase in HGV trip generation to/from the site and no change in access arrangements for such trips.

5.11 Overall, the site is in an accessible location and is not expected to result in a change in vehicular trip generation, an appropriate level of parking existing and will remain for the industrial function of the site. Overall, the proposal is considered acceptable on highway, access and parking grounds, in accordance with Policy T1 and T2 of the Local Plan.

### Hours of Operation & Residential amenity

5.12 This safeguarded employment area far outdates the residential development to the north of the site which was constructed around 10 years ago on a former industrial site. Therefore, the NPPF's agent of change applies whereby existing businesses and facilities should not have unreasonable restrictions placed on them, as a result of development permitted after they were established. In this case, there is not considered to be any greater amenity

impacts from a Class B2 or Class B8 use than the previously permitted timber merchant operations. As such, it is not considered appropriate to restrict hours of operation.



### **Biodiversity**

- 5.13 The Application Site comprises all hardstanding and built form with no existing habitat value within the red line extent. Additionally, the proposal does not include any building operations and is simply for the change of use of existing areas. As such, no habitat is affected by the proposal, and the development is therefore exempt from the requirement to provide Biodiversity Net Gain.

6.0 **Summary and Conclusions**

- 6.1 The proposed scheme seeks the re-use of a vacant and redundant non-employment (*Sui generis*) building within an Employment Area for flexible Class B2/B8 industrial use.
- 6.2 The proposal is appropriate in scale for the local context, is accessible by a range of transport modes and would meet the need/demand for additional industrial floorspace within the district.
- 6.3 There would be no material change in vehicle trip generations from the existing *Sui Generis* use and more sustainable trip options available from the proposed provision of cycle parking.
- 6.4 Overall, the presumption in favour of sustainable development should be applied as there are no policy conflicts arising from the proposal to outweigh the benefit of the delivery of additional employment floorspace.