

Planning Department
North Hertfordshire District Council
Council Offices,
Gernon Road,
Letchworth,
SG6 9SX

08-10-25

Dear Mr. Howard,

**OBJECTION TO PLANNING APPLICATION: 25/02092/FP
45 BURY MEAD ROAD, HITCHIN, SG5 1RX**

I write on behalf of our Clients, Ranson Naturals Limited and D&A Engineering, both long-established businesses operating from 53 Mead Industrial Estate, to formally object to the above planning application concerning 45 Bury Mead Road.

It is understood that the proposal is for the change of use from Class E (g) (office and light industrial) to Class F.1 (Mosque). Proposals include the demolition of two disused storage buildings, and the enlargement and alteration of two existing buildings (which are currently used as a vehicle parts store), to form a mosque with the capacity to accommodate 210 worshippers. In terms of car parking, 16 spaces are proposed, alongside a 6 cycle spaces and bin storage provision.

In relation to the above proposal, we respectfully submit the following points of objection for your consideration. Please also refer to the accompanying Technical Note (Ref: 25099) produced by Mosodi which sets out our Client's concerns regarding (1) the proposals from a transport and highways safety point of view, and (2) the robustness and accuracy of the accompanying Transport Statement produced by Mode. This Technical Note is the main objection document. The purpose of this Covering Letter is to summarise the key 'themes' which this objection is based on.

1. Inappropriate Use Within a Designated Employment Area

The site is located within a designated employment area, where the prevailing land use is industrial and commercial. As per Policy ETC1 'Appropriate Uses in Employment Areas', it confirms that within allocated Employment Areas, planning permission will be granted where development is for Use Classes B1 (business), B2 (general industrial) or B6 (storage and distribution). Planning permission for other uses will only be granted as an 'exception' where they are:

- Ancillary to Use Classes B1, B2 or B6;
- Essential to the continued operation of an established premises;

- Would bring comparable benefits to a B-class use in the same location; or
- Would make use of a site that would otherwise be likely to become or remain vacant for an extended period of time.

In relation to bullet point one, the introduction of Use Class F.1 use (place of worship) represents a fundamental shift in the character of the area, which is intended to support and sustain local economic activity. Permitting this change of use would subsequently undermine the primary function of the land area as an employment-generating area; set a concerning precedent for further non-employment-related developments, and, disrupt the operation of surrounding businesses due to traffic, noise, amenity and access conflicts.

In relation to bullet points two and three, the introduction of Use Class F.1 is not essential to the continued operation of an established business, and it would not bring comparable economic benefits to a B class use in the same location. This is evidenced from reviewing the wider employment area and the businesses that surround the site, including our Client's companies.

Ranson Naturals Limited are a leading developer and manufacturer of natural products and extracts for the Pharmaceutical, Healthcare, Cosmetic, and Food and Drinks industries. The company is known for its expertise in product, process and method development, from laboratory trials to full commercial production. RNL's facility in Hitchin has a rich history dating back to 1846 when chemist Willim Ransom opened the first essential oils extraction drug store in Hitchin. RNL has since evolved to become a significant player in the industry and is a key employer for Hitchin and the wider region of North Hertfordshire District.

D&A Engineering is an architectural metalwork and ancillary services company, providing engineering solutions to essential developments across the Southwest. D&A are also a key player within the construction industry and Hertfordshire District. Protection of this employment area is therefore essential to sustain the local economy and these local long-standing businesses.

By permitting this proposal, we consider that this would inhibit the operating ability of existing businesses located within the Employment Area, including Ranson Naturals and D&A Engineering. Policy ETC1 is adopted for a purpose, to protect the local economy and also support the expansion and redevelopment of sites which would lead to an improvement and/or expansion of the employment floorspace. This proposal therefore has a danger of (1) negatively impacting the operational ability of existing businesses due to the proposal causing an increased pressure on the local highway network and conflicting with the existing businesses delivery / highways movements (summarised further below), and (2), reducing the available floorspace within the Employment Area would restrict existing premises to expand and grow economically.

In regards to bullet point four, it is recognised that the site appears to be vacant. However, we would respectfully request that the case officer requests evidence that the site has been actively marketed for a minimum period of 2 years, confirming no market interest, before the site is considered for a change of use from an adopted employment allocation.

2. Shortfall of Parking Provision Resulting in Safety Concerns

The proposal includes only 16 parking spaces including 2 disabled car parking spaces, which is grossly insufficient for a place of worship of this nature. Based on typical attendance levels for religious gatherings, especially during peak times such as Fridays and religious holidays, the site is likely to attract a significant number of worshippers, many of whom are expected to travel by car. Also referring to the Mosque Timetable appended to the Planning Statement, it is evident that peak times would be Friday prayers between the hours of 13:00 – 14:30. This, combined with the under-provision of parking spaces, would cause overspill parking onto Bury Mead Road and the surrounding road network.

In respect of Council's Supplementary Planning Document on 'Vehicle Parking at New Developments', it states that under the 'Places of Worship' category the standard required is 1 car parking space per 10sqm of floor area. The floorspace proposed is approximately 1,817sqm, therefore, 181 spaces would be required. There is therefore an under provision of 165 spaces. It is also a requirement under Policy T2 'Parking', for proposals to have regard to relevant Supplementary Planning Documents, and for applicants to clearly identify how they provide for all likely types of parking demand.

We consider this shortfall in dedicated parking will result in:

- Overflow parking on surrounding roads and within the industrial estate,
- Obstruction of commercial access points, disrupting deliveries and logistics to surrounding business premises, including the Industrial Estate.
- Increased risk to pedestrian and vehicular safety, particularly in an area that experiences frequent HGV movements and is not designed to accommodate high volumes of short-term or visitor traffic, or pedestrian traffic.

Please also refer to the accompanying Technical Note (Ref: 25099).

3. Car Parking Layout

In regards to the car parking layout, we consider that there are safety concerns to make you aware of, and the 16 car parking spaces proposed are not a true reflection of the potential arrangement. It is evident that the proposed car parking layout is unsafe, restricting cars to maneuver safety.

As outlined within the accompanying Technical Note (Ref: 25099), a tracking exercise has been undertaken of the proposed car parking layout which demonstrates that a maximum of 10 bays could be accessed and that the parking would require significant reversing. As such, a banksman would be required to assist as the car parking is substandard. A new entrance onto the highway would also be required to facilitate this quantum.

To summarise, the tracking of the proposed car park confirmed that only up to 10 spaces could be accommodated on Site. The parking standards set out a requirement for 181 spaces as part of the development. This would therefore leave 151 cars without an opportunity to park within 500m of the Site. When utilising the optimistic figure which the proposal suggests (81 vehicles), therefore, this would add a

further 71 cars parking on local streets.

This conclusion is natural concerning, considering Bury Mead Road is already a congested road with evidence of street parking and illegal parking already existing on both sides of the carriageway. It is also noted that Hertfordshire County Council echo our concerns, as per their statutory objection dated 01/10/25.

The image below also illustrates Bury Mead Road, approximately 150 meters from the application site. This photograph was taken at 13:00 on Friday 3rd October, which would subsequently be the time of the Mosque's busiest period. As can be seen from the photograph, HGVs are already having to navigate around cars parked along the street. This combined with pedestrians crossing is a safety concern, and echoes the above comments made.

Figure 1.1 : Photograph of Bury Mead Road



4. Encouragement of Car Dependency

Owing to its formal employment allocation, the location of 45 Bury Mead Road is situated in a predominantly industrial zone, with limited public transport access, an area where the uses are not conducive to a high-footfall community use. The proposed use is a community facility, and therefore, due to the site's accessibility issues this will naturally encourage car use, further exacerbating the already insufficient parking provision and

increasing local traffic congestion—especially during peak worship times.

It is noted that the existing mosque is located on Florence Street, Hitchin, which is a predominately residential area. The community have therefore been actively looking for many years to re-locate to a location that is *'less sensitive to the nature of the use and the hours of operation.'* North Herts Council has a responsibility to promote active and sustainable travel modes, and we would therefore argue that the existing location is in a far more sustainable location, whereby worshippers can access the mosque by foot, rather than by car. Additionally, vulnerable road users, including children, elderly individuals, and those with mobility impairments, would be exposed to increased safety risks due to the lack of segregated pedestrian routes, absence of formal crossing points and congested and erratic parking patterns that already exist along Bury Mead Road.

Both clients have also expressed concern on how the proposal will severely impact the operation of their businesses which are located on the Mead Industrial Estate some 200m northwest of the proposed Site. Both businesses are accessed via Bury Mead Road and have to route past the proposed Site in order to access the wider highway network as currently Bury Mead Road is an industrial cul-de-sac.

As per Policy T1 'Assessment of Transport Matters' planning permission will only be granted where development would not adversely impact on highway safety and Travel Plans are provided, where required. Due to the significant under provision of car parking spaces, and aforementioned concerns regarding highway safety, we would expect this to be a report requested by the Council, to be submitted prior to determination. Additionally, limited proposals have been put forward to reduce the impact on Bury Mead Road. The provision of 6 cycle spaces for 400 people only equates to 1.5%.

5. Design and Visual Impact of Proposed Alterations

There is no Design and Access Statement submitted with this application, therefore, a thorough review of the proposed plans have been undertaken. We consider that the proposed addition of three domes to the roof structure, and external cladding alterations, are visually out of character with the existing industrial fabric, and the residential areas located directly to the south of the site. These architectural features, while appropriate in a religious or community setting, are incongruous with the surrounding site's context. We consider that these changes are significant to the existing baseline position, and would affect the visual coherence of the area, impacting both the local environment and the perception of the area as a viable employment location.

As per Policy D3 'Protecting Living Conditions', planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. We consider that the living conditions of neighbours, existing residents and surrounding employment premises would be negatively impacted as a result of this development, due to the harm arising from increased traffic generation, inconsiderate street parking, noise impacts during the mosque visiting hours, and the visual intrusiveness of the mosque itself, particularly regarding the surrounding residential areas. It should also be noted that the rear gardens of properties located along Heathfield Road are located directly to the rear of the proposed development. We consider that impacts on residential amenity and their existing living conditions are therefore encouraged to be further investigated before a determination is made. As per Policy D3, mitigation measures should be taken into account to mitigate any harm to an acceptable level.

Additionally, although the applicant considers that natural vegetation between the site and rear properties

would reduce any impact, this has not been illustrated via a Landscape and Visual Impact Assessment, which we would consider to be a requirement for an application of this context.

Please also refer to the Images below which demonstrate that car parking is already a problem surrounding Heathfield Road, the residential area located to the rear of the site. Naturally, this is concerning, as parking would continue to occur, and potentially worsen as a result of the development, causing an amenity issue.

Figure 1.2: Photographs of Car Parking along Heathfield Road and the Surrounding Residential Area



Conclusion

We object to this proposal on behalf of our Clients, Ranson Naturals Limited and D&A Engineering. We strongly disagree with the applicant's conclusion that this site is considered a sustainable location whereby non-car modes of transport can be accessed readily. It is evident that this location is characterised by frequent car, van and HGV movements, limited pedestrian infrastructure, and substantial on-street parking activity. These

conditions present inherent safety risks and make the site unsuitable for a high-footfall, pedestrian-oriented use such as a place of worship. These concerns are also echoed within the Designing out Crime Officer dated 16/09/25 and County Council Highways dated 01/10/25.

It is appreciated that the Hitchin Muslim community are eager to find a new site for their Hitchin Islamic Centre / Mosque, which our Clients readily support. However, we are of the view that 45 Bury Mead is not an appropriate location for this use. It would present an operational and safety risk to future users, and businesses and users of the existing employment site premises. Additionally, the proposal as it stands does adequately discourage car dependency or promote sustainable travel, contrary to adopted Policies within Hertfordshire Local Plan. Given these issues, we kindly request that Hertfordshire Council either request the applicant withdraws the application, and works with the applicant to overcome the car parking capacity and safety issues, or, refuse the application due to the development presenting an unacceptable risk to highway safety and does not meet the required standards for approval

In summary, we respectfully urge that North Herts District Council does not support this application, on the grounds of:

- Inadequate parking provision and increased risk to safety;
- Increased car dependency in an area lacking public transport infrastructure;
- Incompatibility of proposed use within a protected employment area and loss of allocated employment space;
- Disruption to surrounding existing business operations; and
- Visual incongruity and negative impact to residential amenity.

We trust that North Hertfordshire District Council will give due consideration to the above concerns and uphold the integrity and function of the Mead Industrial Estate as a vital economic area.

Please do not hesitate to contact us should you require further clarification.

Yours faithfully,



Nikki Sills

Partner