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Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning

North Hertfordshire Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

District ref: 25/02092/FP
HCC ref: NH/26398/2025
HCC received: 9 September 2025
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

45 Bury Mead Road, Hitchin, Hertfordshire, SG5 1RX

Application type

Full Application

Proposal

Full Planning Permission : Change of use from Class E (g)(office and light industrial) to Class F.1(Mosque) including enlargement (Alterations to roof and the addition of domes) and alterations to the building form of both buildings (including external cladding) and fenestration. Provision of 16 parking spaces, cycle store and bin storage following demolition of existing two outbuildings

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

The HA objects to the proposed development in its current form due to the following concerns:

- Insufficient and poorly designed on-site parking, which fails to meet operational and safety standards.
- Unrepresentative travel survey data, based on a limited sample from a location with different parking controls and travel behaviour.
- Inadequate assessment of parking stress and trip generation, particularly during peak periods.
- Safety risks associated with the internal layout, including obstructed access routes, substandard bay dimensions, and poor cycle storage design.
- Safety risks arising from the proposed location within an industrial area, which is unsuitable for high pedestrian activity due to frequent HGV movements, lack of pedestrian infrastructure, and erratic on-street parking.

Given these issues, the HA cannot support the application as submitted. The proposal fails to demonstrate a satisfactory, policy-led approach to delivering a safe and accessible development for all users. It does not adequately discourage car dependency or promote sustainable travel, contrary to the objectives of Hertfordshire's Local Transport Plan 4 (LTP4) and the principles of sustainable development outlined in the National Planning Policy Framework (NPPF). As such, the development presents an unacceptable risk to highway safety and does not meet the required standards for approval.

Highways comments:

The application seeks a change of use from Class E(g) (office/light industrial) to Class F.1 (place of worship – mosque), including demolition of two outbuildings and construction of a new facility accommodating up to 210 worshippers during peak Friday prayers (1pm–2pm). The proposal includes:

- 16 on-site car parking spaces (including 2 blue badge bays and 1 EV bay)
- 6 cycle parking spaces
- Bin storage provision

The Highway Authority (HA) has reviewed the Transport Statement (TS) dated August 2025 and has the following comments to make:

Parking Provision and Management

While the Local Planning Authority (LPA) is responsible for determining the adequacy of parking provision, the HA must ensure that parking is managed safely and efficiently to avoid adverse impacts on the local highway network.

The TS states that the proposed development will provide 16 on-site car parking spaces and places strong emphasis on promoting active and sustainable travel modes. It also notes that pre-application advice from North Herts Council (LPA) was supportive of a reduced parking provision, subject to further justification.

However, the HA considers the proposed on-site car parking provision to be significantly below the expected standard for a development of this nature and scale. This concern is further compounded by the impractical and unsafe design of the parking layout, which may reduce the effective number of usable spaces and compromise safe manoeuvring.

While the TS acknowledges that peak demand particularly during Friday prayers will result in overspill parking onto Bury Mead Road, the HA is concerned that this could lead to:

- Increased parking stress on Bury Mead Road and surrounding streets, causing nuisance and stress for local users
- Obstruction of access routes, including emergency and service vehicle access
- Inconsiderate or illegal parking on the highway (potentially on both sides of Bury Mead Road carriageway)
- Safety risks and concerns for pedestrians and other road users both near the site access and within the internal layout

Sustainable Location and Accessibility

The TS asserts that the site is in a sustainable location, citing access to public transport and active travel routes, and notes that pre-application advice was obtained from North Herts Council (LPA). However, no pre-application engagement was undertaken with the HA. Had such consultation taken place, the HA would have raised significant concerns regarding the suitability of the proposed use within an industrial area. 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 expanded upon in the sections below.

The proposed development introduces a significant volume of pedestrian activity during its peak use, regardless of it occurring one afternoon a week, into an industrial area primarily designed for trade and commercial vehicle operations. Such areas typically experience frequent HGV movements, constrained manoeuvring space, and limited visibility, making them inherently unsuitable for high-footfall public use. Vulnerable road users, including children, elderly individuals, and those with mobility impairments, would be exposed to increased safety risks due to:

- Lack of segregated pedestrian routes, compounded by footway and inconsiderate parking
- Absence of formal crossing points
- Congested and erratic parking patterns along Bury Mead Road
- A tendency for visitors to park as close to the site as possible, resulting in heavy parking along both sides of the carriageway, exacerbated by drop-offs and instances of illegal or inconsiderate parking.

These conditions present a serious and unacceptable risk to pedestrian safety and conflict with the principles of safe and inclusive access promoted by both Hertfordshire's Local Transport Plan (LTP4) and the National Planning Policy Framework (NPPF).

As mentioned above, the proposal conflicts with both local and national transport and planning policies:

Hertfordshire County Council's Local Transport Plan 4 (LTP4) – Policy 1 prioritises walking and cycling at the top of the transport hierarchy and requires developments to demonstrate safe and accessible pedestrian provision. The current proposal fails to meet these standards.

National Planning Policy Framework (NPPF) – Paragraphs 104–106 require developments to:

- Provide safe and suitable access for all users
- Avoid conflicts between transport modes
- Promote healthy and inclusive communities

The proposed location and layout do not align with these principles and introduce avoidable safety risks.

Trip Generation and Survey Limitations

The TS relies on a travel survey of 32 congregants from the existing mosque, which is located within a Controlled Parking Zone (CPZ) and within a heavily residential area. This naturally restricts car use and encourages walking or drop-offs. The proposed site lacks such controls, which makes the use of this survey data unrepresentative of expected travel behaviour that can be expected at the proposed site, to clarify:

- The existing mosque is in a residential area, while the proposed site is in an industrial zone
- Visitors living south of the existing mosque will have a longer journey to the new site
- The lack of parking controls is likely to encourage more car trips than currently observed
- Assessment should be based on class of use as well as faith-specific patterns. However, it is acknowledged that places of worship and in this case peak mosque activity, occur outside traditional AM/PM peak hours, reducing impact on the wider highway network.

Parking Survey Accuracy

The TS claims there are 139 available spaces on Bury Mead Road and 521 within 500m. However:

- The parking survey covered spaces on both sides of the Bury Mead Road carriageway; however vehicles park on one side of the carriageway only, therefore the actual acceptable and usable capacity may be significantly lower than stated.

- Google Maps imagery shows high level of parking along the northern side of the road fronting the site

Comparison with Extant Use

The TA compares mosque trip generation (97 daily two-way trips) with the previous office use (140 trips). However:

- The proposed site appears to have been vacant for some time
- No evidence has been provided on when the sites existing class of uses ceased operation
- The comparison is not meaningful, as the current baseline trip generation is negligible
- Given the site's current inactivity and the nature of the proposed use, the extant use cannot be relied upon as a valid comparator for trip generation. The assessment should instead focus on the real-world impact of the proposed development, including its peak-time activity, pedestrian safety risks, and compatibility with the surrounding industrial environment.

Internal Layout Concerns

The HA has serious concerns on the internal car parking layout for the following reasons:

- Several parking bays (e.g., bays 5–8 and 12 and 13) are undersized and should be 6m long to allow safe manoeuvring
- The entry/exit door is located between bays 15 and 16, posing a safety risk for visitors egressing the building, especially for children
- Bay 6 obstructs the emergency exit route and must be removed or relocated
- Doors must be kept clear of any obstruction, to ensure unhindered path for pedestrians, people with disabilities in case of emergencies.
- Swept path analysis is required to demonstrate safe access to all bays
- Cycle storage is poorly located and inaccessible given the proximity of parking bay no.13 opposite

Other Considerations

- The applicant will be responsible for the cost of reinstating the redundant vehicle crossover to footway/verge
- A car parking management plan should have been provided on how the car parking during main events would be managed, controlled and restricted to ensure ease and safe accessibility by pedestrians, cyclists, vehicle traffic etc within and outside of the development on the public highway.

The planning process seeks/provides the opportunity to improve conditions for both development and highway safety by applying current higher standards of policies, design, accessibility, and safety to new developments, and not to retain and/or continue with past obsolete standards or expectations.

Recommendation

The HA objects to the proposed development in its current form due to the following concerns:

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- Inadequate assessment of parking stress and trip generation, particularly during peak periods.
- Safety risks associated with the internal layout, including obstructed access routes, substandard bay dimensions, and poor cycle storage design.

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Given these issues, the HA cannot support the application as submitted. The proposal fails to demonstrate a satisfactory, policy-led approach to delivering a safe and accessible development for all users. It does not adequately discourage car dependency or promote sustainable travel, contrary to the objectives of Hertfordshire's Local Transport Plan 4 (LTP4) and the principles of sustainable development outlined in the National Planning Policy Framework (NPPF). As such, the development presents an unacceptable risk to highway safety and does not meet the required standards for approval.

Signed

Senober Khan

1 October 2025