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Planning Department
North Herts Council
Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

28th January 2025

Dear Sir/Madam

**Re: Change of use of B8 storage and distribution with associated offices above (vacant) to pool hall (Class E (d)):
59-61 Knowl Piece, Wilbury Way, Hitchin, Herts, SG4 0TY**

This Planning and Design and Access Statement is prepared on behalf of Mr Wells in support of an application for the change of use of a vacant electrical storage and distribution centre with associated offices (Class B8), now vacant, to a pool hall (Class E (d)).

This document has been prepared to assist the Council's officers and members in determining the appropriateness of the development. The applicants are confident that this is the case, and that planning permission should be granted subject to conditions where appropriate and necessary.

Site description and character of the area

The site consists of a two-storey building with a pitched tiled roof, previously used for storage and distribution by an electrical company. The ground floor was primarily used for storage and logistics, while the upper floor housed associated office space. The building is currently vacant, with the last recorded use in July 2024.

The site includes on-site parking for up to sixteen vehicles, which would have previously accommodated staff, visitors, and operational needs. The building's layout and existing infrastructure present an opportunity for adaptive reuse, making it suitable for alternative employment or leisure related uses such as the one proposed.

The immediate area is characterised as a modern urban industrial estate, accommodating a diverse mix of commercial uses. These include offices, storage, and distribution facilities, as well as recreational amenities such as a gym and an indoor play area. The built environment consists of brick-constructed buildings with tiled roofing, reflecting a functional and uniform architectural style typical of contemporary industrial developments.



The layout is structured to support both vehicular and pedestrian access, with on-site parking provisions surrounding the buildings. The estate benefits from good transport connectivity, facilitating the movement of goods and services, as well as ensuring ease of access for employees and visitors. The presence of varied commercial uses within the estate contributes to its vibrancy, supporting both economic activity and community engagement.

Proposal

Planning permission for the change of use of change of use of a vacant electrical storage and distribution centre with associated offices (Class B8), now vacant, to a pool hall (Class E (d)). No external works would be required as part of the development.

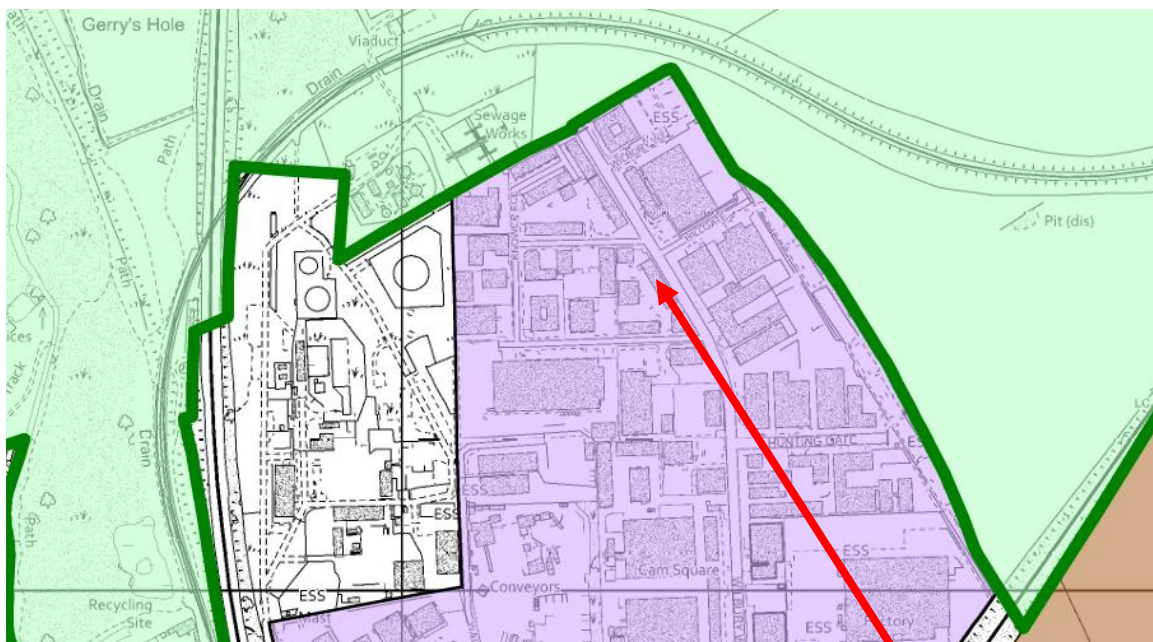
The site benefits from sixteen on-site parking spaces which will be retained for the new use. It is proposed to have three full time staff and six part time staff with operating hours of 12:00pm – 23:30pm Sunday – Thursday and 12:00pm – 00:00am Friday – Saturday.

Relevant Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

Local Development Plan

Proposals Map Showing Site Within Designated Employment Zone Policies SP3 and ETC1



Site Location



Relevant policies from the North Hertfordshire Local Plan 2011-2031 comprise:

Policy SP1: Sustainable Development in North Hertfordshire

This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;
- b) Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;
- c) Grant planning permission for proposals that, individually or cumulatively:
 - i. deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;
 - ii. create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;
 - iii. provide the necessary infrastructure required to support an increasing population;
 - iv. protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and
 - v. secure any necessary mitigation measures that reduce the impact of development, including on climate change; and
- d) Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan.

Policy SP3: Employment

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. We will

- a) Allocate an adequate supply of employment land to meet the needs of the Functional Economic Market Area over the plan period to 2031. The allocations as shown on the Policies Map are:
 - i. east of Baldock BA10 (19.6ha); and
 - ii. west of Royston RY9 (10.9ha);
- b) Safeguard Employment Areas within the District's main settlements, as shown on the Policies Map, to enhance and protect their employment potential;
- c) Work with landowners, developers and, for sites on the edge of the District, adjoining authorities to identify an appropriate amount of employment land to be included through the master planning process in strategic housing sites;
- d) Permit an appropriate range of offices, research and development, light industrial or B class employment uses within these areas;
- e) Promote and support the expansion of the knowledge-based economy in the District. Proposals for the redevelopment of existing employment sites and the development of new employment sites which increase the level of knowledge-intensive employment will be supported in principle.
- f) Support offices, research and development, light industrial and B class uses in appropriate locations outside of designated employment areas, including offices



- in main town centres and concentrations of these employment uses in certain villages; and
- g) Ensure relevant policies of this Plan recognise the contribution of sectors other than B Class uses and offices, research and development and light industrial uses, including tourism, to the provision of jobs.

Policy ETC1: Appropriate uses in Employment Areas

Within the safeguarded Employment Areas, and the Employment Allocations (BA10 and RY9), as shown on the Policies Map, 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.

Planning permission for other uses will be granted as an exception to the above criteria 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. Would make use of a site that would otherwise be likely to become or remain vacant for an extended period.

Conditions and legal agreements will be used to limit uses to ensure that development meets, and will continue to meet, identified employment needs.

Policy D1: Sustainable Design

Planning permission will be granted provided that development proposals:

- a) Respond positively to the site's local context;
- b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:
 - i. create or enhance public realm;
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);
 - iii. reduce energy consumption and waste;
 - iv. retain existing vegetation and propose appropriate new planting;
 - v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;
 - vi. future proof for changes in technology and lifestyle;
 - vii. design-out opportunities for crime and anti-social behaviour; and
 - viii. minimise the visual impact of street furniture and parking provision;
- c) Have regard to the Design SPD, and any other relevant guidance;
- d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and
- e) For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.



Policy T1: Assessment of transport matters

Planning permission will be granted provided that:

- a) Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network;
- b) Mechanisms to secure any necessary sustainable transport measures and / or improvements to the existing highway network are secured in accordance with Policy SP7;
- c) Suitable Transport Statements, Transport Assessments and / or Travel Plans along with supporting documents are provided where required; and
- d) For major developments, applicants demonstrate (as far as is practicable) how:
 - i. the proposed scheme would be served by public transport;
 - ii. safe, direct and convenient routes for pedestrians and cyclists will be provided; and
 - iii. comprehensive integration into the existing pedestrian and cycle, public transport and road networks will be secured.

Policy T2: Parking

Planning permission will be granted provided that:

- a) Parking for residential development is provided in accordance with the minimum standards set out in Appendix 4 of this Plan;
- b) Parking for non-residential development is provided having regard to the standards for non-residential development set out in the relevant Supplementary Planning Document;
- c) Proposals have regard to relevant Supplementary Planning Documents, strategies or advice and;
- d) Applicants clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.

Variations from these standards will only be considered where applicants can demonstrate that the accessibility, type, scale, mix and use of the development; the availability of and opportunities for public transport; local car ownership levels; and on-street conditions justify such variations.

Policy Summary:

1. Policy SP1: Sustainable Development in North Hertfordshire

- **Re-use of Previously Developed Land (Clause a):** The proposal supports sustainable development by making efficient use of an existing vacant building, reducing the need for new land allocation.
 - **Provision of Facilities (Clause c.i):** The pool hall contributes to the local mix of jobs and leisure facilities, helping to meet community needs and diversify the area's economic activity.
 - **Healthy Lifestyle Choices (Clause c.ii):** A pool hall promotes recreation and social interaction, aligning with policy aims to improve the well-being of residents and workers.
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2. Policy SP3: Employment – Supporting Economic Growth

- **Recognition of Non-B-Class Uses (Clause g):** While the site was originally designated for employment uses, Policy SP3 acknowledges the economic contribution of other sectors, including leisure and tourism, which aligns with the proposed pool hall.
 - **Utilisation of a Vacant Site (Clause b & f):** The policy seeks to safeguard employment areas, but the change of use prevents the site from remaining vacant long-term, ensuring continued economic activity and job creation.
 - **Diversification of the Local Economy (Clause e):** The introduction of a leisure use expands the area's economic base, making it less reliant on traditional employment sectors and attracting visitors, which may generate secondary economic benefits.
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3. Policy ETC1: Appropriate Uses in Employment Areas

- **Making Use of a Vacant Site (Clause iv):** The proposal prevents the site from remaining vacant for an extended period, a key criterion for allowing exceptions to designated employment uses.
 - **Comparable Employment Benefits (Clause iii):** The pool hall will generate employment opportunities comparable to the previous storage and distribution use, including roles in management, customer service, facility maintenance, and hospitality.
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4. Policy D1: Sustainable Design

- **Enhancement of the Local Context (Clause a):** The proposal retains and repurposes an existing structure contributing positively to the area's built environment.
 - **Social Connectivity and Crime Prevention (Clause b.v & b.vii):** A pool hall fosters social interaction, reduces vacancy related security risks, and provides an active use that enhances the vibrancy of the employment area.
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5. Policies T1 & T2: Transport and Parking Considerations

- **No Adverse Impact on Highways (T1 Clause a):** The proposed use is unlikely to generate significant traffic, potentially reducing heavy vehicle movements compared to the previous storage and distribution use.
 - **Encouraging Sustainable Transport (T1 Clause d):** The employment area already has good transport links, supporting sustainable access.
 - **Appropriate Parking Provision (T2 Clause b):** The pool hall can use existing parking facilities to meet visitor demand, aligning with local parking standards.
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National Planning Policy Framework 2024

The National Planning Policy Framework (NPPF) was introduced on 27 March 2012 and was updated in December 2024. It continues to establish a presumption in favour of sustainable development through *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*



a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.” (Chapter 2, NPPF, 2024).

1. Efficient Use of Land and Sustainable Development

- The NPPF encourages the reuse of previously developed (brownfield) land, making the most of vacant or underutilized buildings. The proposal to change the use of a vacant storage and distribution unit with ancillary offices to a pool hall aligns with this principle by ensuring the site remains economically productive and does not contribute to urban decline.
- Sustainable development principles support projects that provide a balance of economic, social, and environmental benefits. The pool hall contributes to the local economy while enhancing community well-being by offering recreational opportunities.

2. Building a Strong, Competitive Economy (NPPF Chapter 6)

- Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. This proposal supports economic diversification, responding to changes in business and leisure demands.
- Significant weight should be placed on economic growth and productivity. The shift from storage and distribution to a leisure use capitalizes on local opportunities, ensuring the site remains commercially viable.
- The flexibility of planning policies (NPPF Clause e) allows for changing economic needs, enabling alternative employment-generating uses like leisure and tourism within employment areas.
- The pool hall supports the modern economy by responding to shifts in consumer demand for experience-based businesses. Similar to the NPPF's emphasis on providing for knowledge-based industries and logistics, leisure facilities contribute to economic resilience and local vibrancy.

3. Supporting Employment and Economic Growth (NPPF & Local Policy SP3, ETC1)

- The NPPF acknowledges that different sectors have specific locational requirements. While storage and distribution play a key role, alternative uses that generate comparable employment levels should be considered.



- The pool hall will create local jobs, including managerial, operational, hospitality, and maintenance roles, thereby replacing the employment lost from the site's previous use.
- Policy SP3 (Employment) recognizes non-B-Class uses that contribute to job creation and economic activity. The proposed change aligns with these principles by bringing the site back into active use while generating new employment.
- Policy ETC1 permits alternative uses within employment areas where sites would otherwise remain vacant long-term. Given the current vacancy of the storage and distribution unit, the change of use meets this exception criterion.

4. Addressing Barriers to Investment & Site Regeneration

- Vacant employment sites can deter investment and contribute to urban blight. Repurposing the site as a pool hall enhances the local business environment and prevents decline.
- The proposal aligns with NPPF objectives to remove barriers to investment by adapting to economic shifts, ensuring long-term economic resilience.
- The presence of a leisure facility within an employment area may increase foot traffic, benefiting nearby businesses and strengthening the local economic ecosystem.

5. Transport & Accessibility Considerations (Policies T1 & T2)

- The site is already accessible for commercial use, meaning it is likely to have suitable transport infrastructure in place.
- A pool hall will generate different traffic patterns compared to storage and distribution but is unlikely to cause highway safety issues.
- Existing parking facilities can be repurposed to accommodate visitor demand, aligning with Policy T2.

The proposed change of use from a vacant storage and distribution centre to a pool hall is fully justified under both national and local planning policies. The NPPF supports economic diversification, job creation, and the re-use of vacant buildings while recognising the need for flexible planning approaches that respond to evolving economic conditions. Local policies (SP1, SP3, and ETC1) align with this by allowing alternative employment uses where sites would otherwise remain vacant.

By bringing the site back into active economic use, generating new employment, and enhancing leisure provision, the proposal supports sustainable development and strengthens the local economy.

Planning Justification

The site consists of a two-storey brick-built building with a pitched tiled roof, previously used for storage and distribution (B8) by an electrical company. The building is currently vacant (last used in July 2024), presenting an opportunity for adaptive reuse.

The site benefits from sixteen on-site parking spaces and is located within a modern urban industrial estate with a mix of commercial uses, including offices, storage and distribution, a gym, and an indoor play area. The estate is well-connected by transport links, ensuring good accessibility for employees and visitors.



The proposal seeks planning permission for the change of use of the vacant premises to a pool hall (Class E(d)), operating 12:00 pm – 11:30 pm Sunday – Thursday and 12:00 pm – 12:00 am Friday – Saturday, employing three full-time and six part-time staff. No external works are proposed as part of the development.

Policy SP3: Employment is designed to promote sustainable economic growth and provide a robust framework for supporting businesses across a range of sectors. While the policy primarily focuses on safeguarding and allocating employment land for traditional B class uses such as offices, research and development, and light industrial activities it also recognizes the role of other sectors, including those beyond the traditional employment classifications.

Clause (g) explicitly acknowledges that employment generating uses extend beyond traditional office and industrial sectors. This provides a policy basis for supporting alternative business models, such as sports and leisure facilities, which contribute to local employment and economic diversification.

The proposed pool hall would provide employment for three full time staff and six part time staff and offer economic viability to a currently vacant premises, adding to the vitality of the immediate area. The building continues to be occupied for business purposes, ensuring the principles and objectives of policy SP3 are preserved as encouraged by clauses (d) and (f).

The overarching aim of SP3 is to foster sustainable economic growth and strengthen the District's economic offer. Since the leisure and fitness industry is a growing sector that generates employment and promotes community well-being, the policy's principles could be interpreted as supportive of such uses.

While Policy SP3 does not explicitly prioritise sports and leisure facilities within employment areas, its broad recognition of diverse economic contributions suggests that well-justified proposals for such uses could be supported. The emphasis on sustainable economic growth and flexibility in certain employment locations provides opportunities for sports facilities to integrate into the wider employment framework, particularly where they contribute to job creation and business diversification. Therefore, the fact that this proposal would see the re-use of a vacant building and see the employment of staff, with the added value of the economic vitality the use would bring it is fair to say that on balance the proposal would accord with the principles and objectives of policy SP3.

In addition when applying the broader principles of policies SP1, SP3 and ETC1 and combining them with the objectives of the NPPF it is fair to surmise that the importance of economic activity in whatever guise, providing no wider harm is created, should override unnecessary application of stricter policy controls that may otherwise see existing unviable uses retained and existing premises remain vacant. Therefore, it is contended that the proposed change of use would accord with the policy provisions detailed above.



DESIGN AND ACCESS CONSIDERATIONS

Scale and Amount – The proposal will retain the existing 502 square metres of floor space over two floors and the existing sixteen car parking spaces on-site. The scale of the existing building and use does not therefore change.

It is proposed to have eighteen pool tables over the two floors three at ground level and fifteen at first floor level, with a licensed bar on the ground floor. Toilets will be provided on both levels.

Layout – The pool tables will be situated on both ground and first floor levels, as will the toilet facilities. The bar will be on the ground level. Sixteen car parking spaces will be located to the front of the site.

Access – Access will be from the private parking area of the estate, where the parking for the sixteen vehicles can be found. The front of the building faces the parking area.

Conclusion

The change of use from a vacant storage and distribution facility to a pool hall aligns with the principles of sustainable development, employment land optimisation, and economic diversification set out in North Hertfordshire's Local Plan. The proposal ensures the:

- ✓ Reuse of a vacant commercial site, ensuring continued economic productivity.
- ✓ Creates new employment, comparable to the previous use.
- ✓ Enhances community well-being, aligning with sustainability objectives.
- ✓ Diversifies the local economy, reducing reliance on traditional employment sectors.
- ✓ Supports transport and infrastructure policies, ensuring sustainable site access.

The proposal is a suitable and productive use of an otherwise vacant site and creates comparable employment opportunities, supports well-being through leisure provision, and enhances the local economy without undermining employment land policies.

Having regard to the above information the local planning authority is respectfully requested to grant planning permission for the above proposal. However, if you require any further information please do not hesitate to contact me.

Yours faithfully

Stephen Andrews B.A. Hons DipTP MRTPI

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