

FORMAL REPRESENTATION

Application 26/01862/LDCE

Storage Building Rear of 94 Pixmore Way, Letchworth Garden City, Hertfordshire

Application type	Lawful Development Certificate, Existing Use
Planning Portal reference	PP-15098534
Description	Use of building for meeting room, seminars and community workshop events
Submitted by	Charles Woodall and Jane Reader, 92 Pixmore Way, Sarah Barker, 98 Pixmore Way Susan Hayes, 96 Pixmore Way Tricia Craggs, 29 Lytton Avenue
Purpose	Representation requesting refusal of the certificate unless the claimed use is demonstrated to be lawful on the evidence

To: North Hertfordshire Council, Development Management

Re: 26/01862/LDCE, Storage Building Rear of 94 Pixmore Way, Letchworth Garden City

Dear Planning Officer,

We write as immediate neighbouring residents to object to the grant of the above Lawful Development Certificate. Our representation is directed to the factual and legal basis of the certificate application, rather than to the planning merits of a community use.

1. Summary of our objection

The application seeks to certify an existing Class F2 local community use described as **"meeting room, seminars, community workshop events"**. The application states that this use began on 1 June 2026. It also states that there has been a material change of use and describes the earlier use as **"a workshop for industrial purposes"**.

We ask the Council not to grant the certificate on the information presently submitted because there are material factual issues that require verification, including:

- the actual lawful former use of the outbuildings before the recent works;
- the actual existing use of the buildings at the application date and now;
- whether the claimed change to Class F2 was capable of occurring without planning permission;
- whether the submitted description accurately reflects the physical conversion and activities taking place;
- the planning status of the recent external alterations and associated works.

2. The application is for an existing use commencing only recently

The applicant gives 1 June 2026 as the date on which the use or activity began. The application therefore does not appear to rely on a long period of continuous unauthorised use becoming immune from enforcement. Instead, the selected ground is that the use began within the last ten years as a change of use not requiring planning permission.

That proposition should be demonstrated clearly. Government guidance states that an applicant for an existing-use certificate is responsible for supplying sufficient factual information and evidence, and that the authority determines the matter on the balance of probability. The guidance also states that the application must describe precisely what is being applied for and that insufficient or imprecise information can justify refusal.

3. Uncertainty over the former lawful use

The application states that the building had been out of use for a long time and was in a deteriorating state, while elsewhere describing its previous use as an industrial workshop. Our direct knowledge as neighbouring residents is that the rear buildings were derelict and unused before the recent acquisition and conversion works.

We do not ask the Council simply to substitute our description for the applicant's. We ask that the lawful planning history and previous use are established from reliable evidence before any certificate is granted. This is particularly important because the legal basis for any subsequent change of use depends on the starting lawful use.

4. Concern that the use applied for does not reflect the actual conversion and use

This is our principal factual concern. The certificate is sought for use as a meeting room, seminars and community workshop events. Our observations are that the outbuildings have instead been converted and/or used as kitchen facilities associated with the adjoining Gurdwara.

At present we do not have an internal photograph showing the cooking equipment, and we therefore do not present that observation as photographic proof. We ask the Council to verify it by inspection. In particular, the officer should establish whether the buildings contain, or show evidence of having recently contained, cooking appliances, food preparation areas, sinks, kitchen services, extraction or ventilation equipment, drainage alterations, waste facilities or other installations associated with kitchen use. Since the photographs accompanying this representation were taken, residents have observed that the windows to the outbuilding have been covered. As a result, the internal arrangement and use can no longer readily be observed from neighbouring property. We do not speculate as to the reason for the windows being covered. However, given the discrepancy between residents' observations of kitchen use and the application description of "meeting room, seminars, community workshop events", this subsequent change makes an internal site inspection particularly important.

The distinction matters in an existing-use certificate application because the certificate must identify with precision the use that was lawful at the application date. If the actual use is materially different from the use described in the application, the Council should not certify an inaccurate description. Residents also ask the Council to consider whether the internal fit out or use has changed since the certificate application was submitted. Any subsequent alteration should not obscure the need to establish accurately what use and fit out existed at the relevant date.

5. Change to Class F2 requires a clear lawful basis

Class F2(b) covers halls or meeting places for the principal use of the local community. Government guidance on the 2020 Use Classes changes explains that changes within a use class do not require permission, but other material changes of use require planning permission. Government guidance also states that planning permission is still needed to convert homes into other uses.

The application should therefore identify the precise lawful former use and the specific legal or permitted development basis relied upon for the recent change to the claimed F2 use. On the material currently available to us, that basis is not apparent.

6. Physical works and recent subdivision of the site

There have also been recent physical changes at the property. Residents have observed alterations to the outbuildings including roof works, windows and doors, a felt flat roof and a modern rooflight. The submitted drawing itself records the outbuilding's current plan and elevations.

In addition, substantial screening has been erected at two points within the property: a plywood hoarding or gate across the access beside the dwelling and a further timber fence across the garden closer to the application building. We do not suggest that the motive for this screening can be established from the photographs. We rely on the photographs only as evidence of the current physical arrangement and limited visibility of the application building from Pixmore Way. Residents have also observed that the former rear boundary has been removed or opened, establishing direct physical access between No. 94 and the adjoining Gurdwara premises. Figure A3 records this arrangement. This connection is relevant to the Council's assessment of the actual relationship between the application building and the adjoining use.

7. A site inspection is necessary

The application form itself states that the site cannot be seen from a public road, public footpath, bridleway or other public land. The recent hoarding and internal fencing further restrict views into the rear part of the property.

We therefore respectfully request that the case officer undertakes an internal and external site inspection before determining the application, rather than relying solely on the submitted plans or an external inspection. The inspection should verify the actual use of each part of the outbuilding, the installed facilities and services, whether there is evidence of current or recent kitchen fit out, the relationship between the outbuilding and the adjoining Gurdwara, the direct rear access between the sites, and the recent physical alterations. The officer is also asked to establish, insofar as the available evidence permits, whether the internal fit out or use has changed since the application was submitted.

8. Photographic evidence and site history

The attached photographs show the current fencing and screening, the rear outbuilding and its relationship with the adjoining premises, and the extent of recent clearance within the garden. A historic aerial image is also included to assist the Council in understanding the former physical relationship between No. 94, its garden, the rear outbuildings and the larger premises beyond.

We are continuing to collate dated evidence relating to the conversion and actual use. If further evidence of the internal kitchen installation becomes available before determination, we will provide it to the Council as supplementary evidence.

9. Requested outcome

For the reasons above, we respectfully request that the Council refuses the Lawful Development Certificate unless the applicant provides sufficiently precise and unambiguous evidence to demonstrate,

on the balance of probability, that the exact use described in the application was lawful at the application date.

In particular, before any certificate is issued, we ask the Council to be satisfied as to:

- the lawful former use of the outbuildings;
- the precise existing use at the relevant date;
- whether the building has in fact been converted to or used as kitchen facilities associated with the adjoining Gurdwara;
- the legal basis upon which the recent change to the claimed F2 use is said not to require planning permission;
- the planning status of the recent external works and alterations.

If the use requires planning permission, the appropriate course would be for it to be considered through the normal planning application process, where the planning impacts of the use can be assessed on their merits.

Yours faithfully,

Charles Woodall and Jane Reader
92 Pixmore Way
Letchworth Garden City

Sarah Barker
98 Pixmore Way

Susan Hayes
96 Pixmore Way

Tricia Craggs
29 Lytton Avenue

Sources and application documents

- North Hertfordshire Council / Planning Portal, Application 26/01862/LDCE, Planning Portal reference PP-15098534, application form dated 24 July 2026.
- Location Plan, 94 Pixmore Way, Planning Portal reference PP-15098534v1, produced 25 July 2026.
- SM Surveyors & Co Ltd, Drawing 02, Outbuilding - Plans and Elevations, April 2026.
- Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Lawful development certificates, GOV.UK.
- Ministry of Housing, Communities and Local Government, Planning Practice Guidance: When is permission required?, GOV.UK.
- The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, explanatory memorandum.

Appendix A - Photographic evidence

The photographs below are provided to assist the Council in understanding the physical arrangement and visibility of the site. Captions describe only what can reasonably be seen from the image and do not attribute motive.



Figure A1. View beside No. 94 showing plywood hoarding/gate across the side access, restricting views towards the rear of the property.



Figure A2. Rear garden area showing the outbuilding and substantial timber fencing separating the rear part of the site. The photograph also shows the extent of recent clearance.



Figure A3. View towards the rear of No. 94 showing that the former rear boundary has been removed or opened and direct access established between No. 94 and the adjoining Gurdwara premises. This physical connection is relevant to understanding whether the application building is operating in association with the adjoining community and religious use.

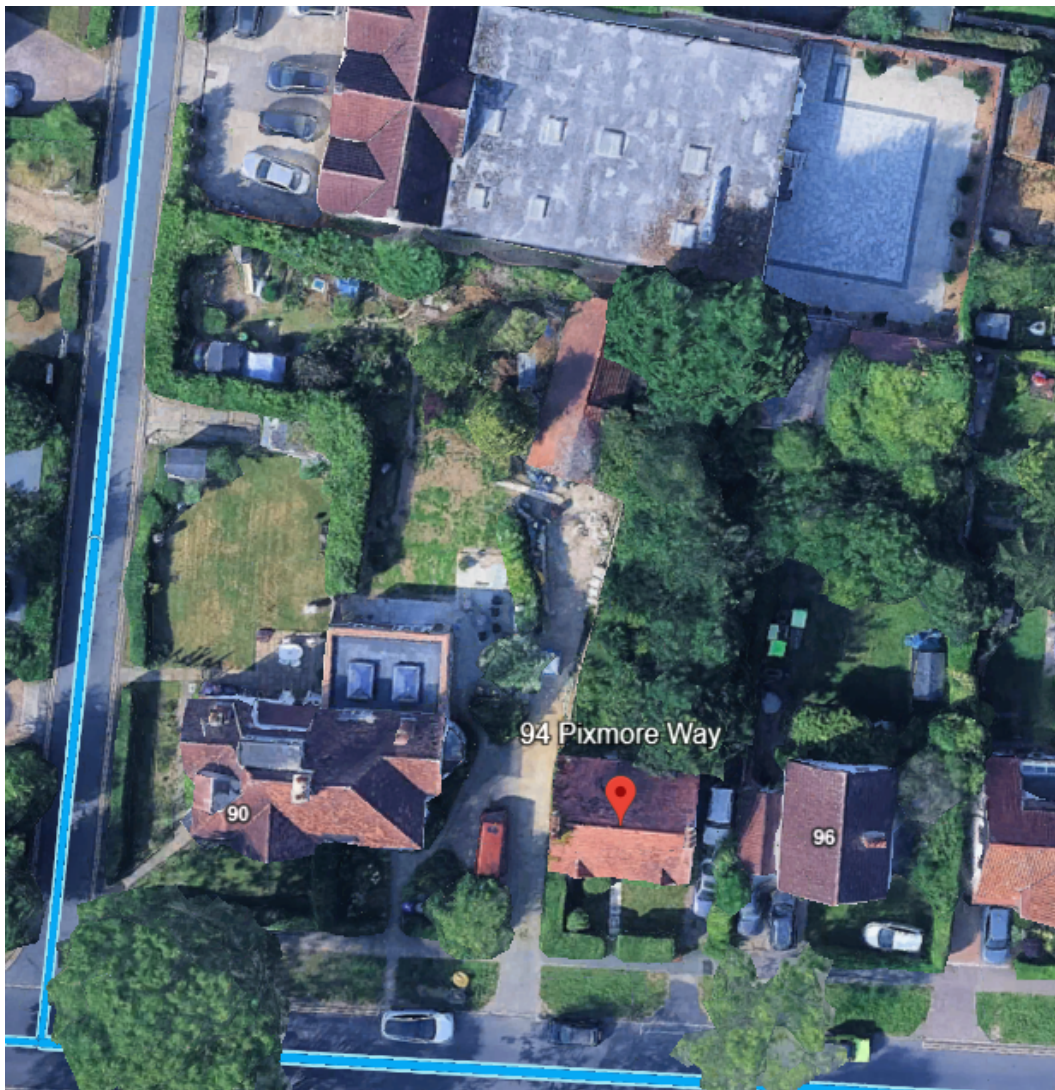


Figure A4. Historic aerial image showing No. 94, its long rear garden, rear structures and the larger premises beyond, before the recent clearance and subdivision visible in current photographs.