

DELEGATED FILE NOTE

CASE OFFICER: ...Melissa Tyler.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
25/00719/FP	Decarbonisation works, including: the provision of insulated rendering to external walls, air source heat pump and associated enclosure, a substation, and photovoltaic panels on roofs. (Amended plan received 07/05/25).	North Hertfordshire Leisure Centre Baldock Road Letchworth Garden City Hertfordshire SG6 2ER

Submitted Plan Nos

NHLC-SBA-XX-XX-DR-A-10210-P03 NHLC-SBA-XX-XX-DR-A-10111-P01 NHLC-SBA-XX-XX-DR-A-10110-P01
 NHLC-SBA-XX-XX-DR-A-00504-P04 NHLC-SBA-XX-XX-DR-A-00503-P05 NHLC-SBA-XX-XX-DR-A-00502-P04
 NHLC-SBA-XX-XX-DR-A-00501-P03 NHLC-SBA-XX-XX-DR-A-00221-P05- NHLC-SBA-XX-XX-DR-A-00220-
 P05 NHLC-SBA-XX-XX-DR-A-00121-P05 NHLC-SBA-XX-XX-DR-A-00120-P04 NHLC-SBA-XX-RF-DR-A-
 10012-P02 NHLC-SBA-XX-RF-DR-A-00022-P04 NHLC-SBA-XX-B1-DR-A-10009-P02 NHLC-SBA-XX-B1-DR-
 A-00019-P04 NHLC-SBA-XX-01-DR-A-10011-P03 NHLC-SBA-XX-01-DR-A-00021-P04 NHLC-SBA-XX-00-
 DR-A-10010-P03 NHLC-SBA-XX-00-DR-A-00020-P04 NHLC-SBA -XX-XX-DR -A -10212 P01 NHLC-SBA -XX
 -XX-DR -A -10211 P04 NHLC-SBA -XX-XX-DR -A -00503 P06 NHLC-SBA -XX-XX-DR -A -00501 P04 NHLC-
 SBA -XX -B1 -DR -A -10009 P03 NHLC Plant Sketch - Level 00 EDS 07-3102.01 C Sheet 1 of 3 EDS 07-
 3102.01 A Sheet 2 of 3 EDS 07-3102.01 A Sheet 3 of 3 794_PLN_LAN_5268_NHLC S3 P04
 794_PLN_LAN_5268_701_NHLC 101 Rev I Landscape Plan

1.0 Policies

National Planning Policy Framework

Section 2 – Achieving sustainable development

Section 8 - Promoting healthy communities

Section 9 - Promoting sustainable transport

Section 11 – Making effective use of land

Section 12 – Achieving well-designed and beautiful places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Supplementary Planning Documents and other.

GDPO

Design SPD 2011

Sustainability SPD 2024

Vehicle Parking Provision at New Development SPD

North Herts Local Plan 2011-2031 Local Plan and Proposals Map

Policy SP2 Settlement Hierarchy and Spatial Distribution

Policy SP9 Design and Sustainability

Policy SP10: Healthy Communities Policy

SP11: Natural resources and sustainability

Policy SP12: Green infrastructure, landscape and biodiversity

Policy T1 Assessment of Transport Matters

Policy T2 Parking

Policy ETC3 New retail, leisure and other main town centre development

Policy D1 Sustainable Design

Policy D3 Protecting living conditions

Policy HC1 Community facilities

Policy NE4 Biodiversity and geological sites

Policy NE12 Renewable and low carbon energy development

2.0 Site History

2.1 Substantial site history – more recent set out below:

2.2 24/02240/PRE Internal and external alterations

2.3 22/03019/FP Change of use of existing squash courts 1 and 2 on first floor to a soft play area and existing squash courts 1 and 2 and the studio on ground floor to soft play area, changing entrance to soft play area with associated toilets and refreshment area to

replace existing staff room and changing areas, installation of first floor window and canopy to south east elevation and the construction of a new public entrance. CP

- 2.4 15/01594/1 Single storey front extension to existing building to provide a Learner / Training Pool with cafe area, terrace and associated two storey plant room; 15 additional car parking spaces, addition of external lighting to revised car park layout and ancillary works.CP

3.0 **Representations**

Statutory Consultees

- 3.1 **Herts Highways** - *The amended proposal includes an updated Construction Traffic Management Plan (CTMP) with only a minor alteration to ensure consistency between the documents related to the similar schemes in Hitchin and Royston. Accordingly my recommendation remains unchanged from my previous formal response of 6th May 2025, which concludes that the Highway Authority has no objection to the proposal subject to the above condition and the inclusion of the Advisory Notes.*

3.2 **North Herts Environmental Health :**

Thank you for consulting Environmental Protection on this application.

The application is supported by a noise assessment which concludes that there will be a low impact from the proposed plant. I agree with this conclusion and raise no objections to the proposals.

3.3 **North Herts Ecology –**

Having read through the submitted documents the preliminary ecological appraisal advised further bat roost assessment and this has been undertaken and no bat interest in the building identified. The March 2025 Statutory Biodiversity Metric records the site as achieving a 13.76% gain in Habitat Units, thereby meeting the mandatory requirement of 10%. The case officer should note Biodiversity Gain condition wording should be added to the decision notice, the biodiversity gain condition is a pre-commencement condition having its own separate statutory basis and is deemed to apply to every planning permission granted for the development of land in England. To ensure the applicant is clear about this distinction the biodiversity gain condition should not be included in the list of conditions imposed in the written notice when granting planning permission but should remain separate.

3.9 **Neighbour Representations**

None received

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

- 4.1.1 The site is North Herts Leisure Centre, which lies just off Baldock Road in Letchworth Garden City. North Herts Leisure Centre is a large multi-use venue, including a gymnasium, swimming facilities, sports courts, soft play area and a café.

4.2 Proposal

- 4.2.1 Planning permission is sought for the decarbonisation works, including: PV panels on the roofs, the provision of external insulated rendering, a substation, and an Air Source Heat Pump and associated enclosure.

- 4.2.2 Additional works being undertaken are set out below and included on the provided plans; this has been done for transparency purposes and because they feed into the wider sustainability benefits (which the submitted Energy Statement captures). However, it is emphasised that these works are not subject to consideration as part of the application.

- Internal changes (do not require planning permission)
 - Bring thermal line inwards.
 - Line the inside face of the sports hall with MDF insulated pane lining
 - Thermostatic Radiator Valves and zonal controls for heating
 - Storing the rejected heat from the Combined Heat and Power
 - Passive Infrared Sensor in office areas
 - Replace existing heat emitters
- De minimis works (as confirmed with Case Officer as part of pre-application process)
 - Replace existing Kallwall with a like for like, better performing system.
 - Insulate the roof from above, and install new roof membrane (either overlay or strip back and replace)

4.3 Key Issues

- 4.3.1 The key issues are:

- ☐ Principle of development and Policy compliance
- ☐ **Decarbonisation works**
 - Design and layout, visual impact on the character of the area
 - Impact on neighbouring properties
- ☐ Highway impacts
- ☐ Biodiversity net gain, Landscape and Ecology
- ☐ Planning Balance

Principle of development and Policy compliance

- 4.3.2 The proposal includes works to the existing leisure centre, located within the settlement boundary of a main town in North Hertfordshire (Policy SP2), which will secure environmental improvements to the building, reducing its carbon impact. This is supported under Policies SP1, SP2, NE12 and D1 of the Local Plan.
- 4.3.3 'Policy SP1: Sustainable development in North Hertfordshire' supports development that will 'secure any necessary mitigation measures that reduce the impact of development, including on climate change'.
- 4.3.4 Policy NE12: Renewable and low carbon energy development' and 'Policy SP11: Natural resources and sustainability' broadly support the provision of renewable and low carbon energy development in appropriate locations.
- 4.3.5 Policy D1: Sustainable design' further seeks to ensure that development proposals 'reduce energy consumption and waste'. Specific requirements/provisions are subsequently set out in the Sustainability SPD
- 4.3.6 The principle of the decarbonisation works are also supported at a National level through legislation, National Policy Statements and the Net Zero Strategy. The NPPF states '*in determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).*'
- 4.3.7 In assessing renewable and low carbon energy proposals the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes.
- 4.3.8 On 21 May 2019, the Council passed a Climate Emergency motion which pledged to do everything within the Council's power achieve zero carbon emissions in North Hertfordshire by 2030. As one of the first councils to pass this motion, NHDC is leading the way on climate action. This declaration asserted the Council's commitment toward Climate Action beyond current government targets and international agreements.
- 4.3.9 Within the submitted Energy Statement it is stated that the proposed works would achieves low carbon energy at the silver standard, as per the North Herts District Council Sustainability SPD.
- 4.3.10 They go on to state that in regards to optimizing passive design & fabric performance the proposed development would meet Silver Standard criteria in the Sustainability SPD— *Being an existing building there is limited opportunity for the optimisation of orientation and layout. In addition, leisure centres have a high energy consumption compared to many other building types, due the hot water demand, making EUI targets unrealistic to achieve. All over silver criteria has been met and surpassed such as an on-site carbon reduction of 72.4% against the existing building being achieved, which far exceeds the 35% identified in the SPD. In addition, provision of numerous low carbon alternative technologies have been specified."*

- 4.3.11 Also in regards to achieving low carbon energy – Silver Standard has also been met – *several low carbon technologies have been considered with the most appropriate systems being utilised which maximise the carbon/energy saving in respect to cost and feasibility of implementation. Furthermore, the building has maximised its PV provision were feasible, intern generating enough electricity equivalent to 9.5% of the building operation energy through PV generation onsite.*

Decarbonisation works

- 4.3.12 The proposed decarbonisation works for North Herts Leisure centre include:

To external brick walls (excluding swimming pool wing & sports hall) add a External Insulated Render system adhered to the existing masonry with a one-coat, through-coloured mineral render or silicone render finish by Weber (colour Sand). Render to feature vertical recesses to break up large areas

Proposed Air Source Heat pumps within secure enclosure and new substations to rear (northwest) of the existing building, located at the lower external ground level adjacent to the basement plant room access.

Proposed PV array on top of main swimming pool roof, sports hall roof and learner pool roof. To be set back from parapet so not visible from ground level. The maximum pitch on the arrays from horizontal is 10°

- 4.3.13 The decarbonisation works constitute enhancements to the building and these will help to support the ongoing operation of North Herts leisure centre, reducing operational costs and the long-term suitability of the building for its purpose; this will ensure that it can continue to act as a facility which supports and improves health outcomes in line with the aspirations of policy SP10 – Healthy Communities.

Design and layout, visual impact on the character of the area

- 4.3.14 Policy D1 of the Local Plan states that planning permission will be granted provided that development responds positively to the site's local context in addition to other criteria. Policy SP9 of the Local Plan further considers that new development will be supported where it is well designed and located and responds positively to its local context. These considerations are echoed in Section 12 of the NPPF.
- 4.3.15 The insulated render will be applied full height to portions of the perimeter of the existing building, predominantly on the North, South and East sides (consisting of the Squash Courts, Gym area and around the entrance at ground and first floor level). The overall form and massing of the existing buildings will remain unchanged. The insulated render will be an off-white/ beige colour to be complementary to the existing brickwork. A modest and mid grey aluminium parapet coping will be added to provide adequate weather protection to the render system.
- 4.3.16 Solar PV panels are proposed to be placed on the roof of the central circulation area, the Sports Hall roof and the rear Squash Court roof. The PV panels will be set back from the roof edges with the existing parapet walls ensuring that visibility of the panels from ground level will be minimal.

- 4.3.17 Replaced windows, curtain walling and Kalwall will be like-for-like in appearance
- 4.3.18 To the east (rear) and southeast an Air Source Heat Pump enclosure, new substation and GRP enclosure are proposed predominantly on existing grass and hardstanding. The ASHP enclosure is enclosed within a close-boarded timber acoustic fence.
- 4.3.19 The proposed rendering has been designed and located and is sympathetic to the existing building in terms of its scale, massing and appearance. The solar panels on the roof have been located to be as visually un-obtrusive as possible.
- 4.3.20 Overall, it is considered that the design and layout of the proposed scheme are acceptable. As such, the proposal would accord with Policies SP9 and D1 of the Local Plan and Section 12 of the NPPF in terms of the design and layout of the scheme.

Impact on neighbouring properties

- 4.3.21 Local Plan policy D3 Protecting Living Conditions states that: *"Planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. Where.....the living conditions of an existing development would be affected by a proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, development proposals will not be permitted."*
- 4.3.22 North Herts Leisure Centre is a large building located on a large plot away from any residential properties. Therefore, the proposal is unlikely to result in any material harm upon the reasonable living conditions and well-being of neighbours. This is in line with Policy D3 of the Local Plan.

Highway access and car parking

- 4.3.23 'Policy T1: Assessment of transport matters' requires that development proposals assess their impact on the highways network. 'Policy SP6: Sustainable transport' further requires proposals to promote the use of sustainable transport modes insofar as reasonable and practicable.
- 4.3.24 'Policy T2: Parking' seeks to secure appropriate parking provision on sites. Within the Planning Statement the agent has outlined that *No additional car parking is proposed on site. The site is located in a sustainable location the heart of Royston and the use of sustainable modes of transport to travel to this site should be encouraged. It is also noted that parking surveys have been undertaken which confirm that there is existing parking capacity to justify this approach and it is noted that there is limited land available on site to deliver additional car parking spaces in any case.*
- 4.3.25 I note that the development includes the loss of one parking space in order to facilitate the proposed substation. However, in the context of the extensive wider parking on site and given that the proposal does not seek to increase the floor space of the leisure centre, this loss is not considered to be material nor is not sufficient to outweigh the significant environmental benefits associated with the proposals in the planning balance.

- 4.3.26 No changes are proposed to the existing access or egress routes from the building or to the site.
- 4.3.27 A Construction Management Plan has been submitted and amended during the application process. Highways have no objections.

Biodiversity net gain, Landscape and Ecology

- 4.3.28 Consultation with North Herts Ecologist has confirmed that the new landscaping is proposed on site forms part of the BNG strategy which will secure a net gain on site of 13.76% in compliance with legal requirements.
- 4.3.29 The development will retain existing trees and hedges where possible to support biodiversity and provide a mature landscape setting. It is identified a tree of low arboricultural value is to be removed to facilitate the Air Source Heat Pump enclosure and allow it to remain behind the existing building line. The new tree and scrub planting proposed as part of the scheme is also considered to mitigate the loss of the tree proposed for removal.
- 4.3.30 Ecology surveys have been undertaken in relation to the site, with the development confirmed not to impact on a number of species and mitigation proposed as necessary.

4.4 Conclusion

- 4.4.1 The proposed development in terms of its design, impact on amenity issues, ecology impacts, landscape impacts, highways and parking standards, is acceptable and considered to comply with the provisions of the Local Plan policies and the National Planning Policy Framework. The general principle of the decarbonisation works is also supported under local policy by virtue of the environmental improvements that will be delivered and the NPPF gives significant weight to these benefits in the planning balance.

5.0 Recommendation

- 5.1 That planning permission be **GRANTED** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

3. The construction of the development shall only be carried out in accordance with the submitted Construction Traffic Management Plan prepared by Willmott Dixon.
Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

Biodiversity Net Gain

1. The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:
(a) a Biodiversity Gain Plan has been submitted to the planning authority, and
(b) the planning authority has approved the plan.
The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be North Hertfordshire District Council.
There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply (<https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>).
Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Proactive Statement:

Planning permission has been granted for this proposal. The Council acted proactively through early engagement with the applicant at the pre-application stage which led to improvements to the scheme. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Informative/s:

1. Should this application be approved HCC recommends inclusion of the following Advisory Notes (ANs) to ensure that any works as part of this development are carried out in accordance with the provisions of the Highways Act 1980 and other relevant processes.

Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public

highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

Further information is available via the website:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Obstruction of public highway land: It is an offence under Section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway network

becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information

is available via the website:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Road Deposits: It is an offence under Section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the

highway. Further information is available via the website:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Signed  Anne McDonald	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF
Determining Officer Date: 19 June 2025	

