

Town and Country Planning Act 1990

Appeal Statement

Address: The Old School House,
 4 Market Hill,
 Royston,
 Hertfordshire,
 SG8 9JL

Proposal Description: Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.

Planning Application Reference: 24/02696/FP

Planning Inspectorate Reference: To Be Advised

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Appendix 1: Heritage and Conservation Officer's Consultation Response.

Appendix 2: Chain of correspondence with Planning officer relating to Heritage and Conservation Officer's further comments.

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Appendix 4: Senior Historic Environment Advisor Consultation Response

Preamble:

- 1 Mark Cotton will say:
- 2 I am Mark Cotton. I am a Chartered Architect with over 20 years' experience of designing developments for sites in locations in all parts of the United Kingdom, including work to historic buildings. I am familiar with the site which is the subject of this appeal. I am Director of Architecture & Design Services, a RIBA Chartered Architectural practice.

Introduction:

- 3 This Appeal is against the decision by North Herts District Council to refuse Planning Permission for the replacement of the existing fibre cement roof coverings and installation of additional insulation and flush mounted photovoltaic panels at The Old School House, Market Hill, Royston.

The Site:

- 4 The Old School house comprises part of the Former Royston National School which was built in 1886 for the children of Church of England families of Royston and is classed, by North Hertfordshire District Council, as a Building of Local Historic Interest.
- 5 The building comprises two distinct elements; the part of the application site which fronts Fish Hill is predominantly a single storey flint building with gault brick dressings, chimneys and a small bell tower whilst the remainder comprises a tall, gable ended, building in yellow brick with red feature brickwork which fronts both Fish Hill and Market Hill. Both elements of the building are roofed with a fibre cement roof slate.
- 6 The Conservation Area Townscape Analysis dating from March 2017 states that:

"...Fish Hill (named after the fish market originally held there) and Market Hill are parallel streets situated to the east of the High Street. The streets are relatively narrow, creating an intimate character which is maintained for the length of Fish Hill, however, Market Hill is tapered in shape and becomes wider as the hill rises to the south and then opens into the Market Place. The Market Place is at a lower level than the A10, which separates the Market Place from The Boars Head and The Green Man public houses which are on the south side of Market Hill and close the view at the top of the Market Place. There is also an open space at the bottom of the hill to the North enclosed by buildings of mixed age and appearance..."

...Royston National School Building (1886-1944) is situated behind the Old Court building between the two streets. It is a single storey flint building with regularly positioned chimneys situated close the eaves. The School provides a strong building line to both Fish Hill and Market Hill and has an enclosed courtyard facing onto Market Hill..."

- 7 The existing fibre cement roofing slates on both parts of The Old School House are well overdue for replacement and there are now signs of significant water ingress internally, particularly in the Meeting Hall.
- 8 In order to ensure the continued viability of the building and prevent the building deteriorating the Appellants have decided to replace the existing roof finishes and, to improve the suitability of the building, wish introduce flush mounted photovoltaic panels and introduce insulation to the main roof whilst carrying out the reroofing works.

Planning History:

9 The Planning History of The Old School House is as follows:

<u>Decision Date:</u>	<u>Application Ref:</u>	<u>Description:</u>	<u>Decision:</u>
3 rd January 2001	00/01684/1	Change of use from retail to cafe and meeting room with ancillary facilities	Conditional Permission
11 th April 2025	24/02696/FP	Full Planning Application - Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.	Refuse

10 The Application to which this Appeal relates was submitted to North Herts District Council (The LPA) on 26th November 2024 and validated on 5th December 2024.

11 The Application was determined under Delegated Authority on 11th April 2025 and was refused.

Reasons for Refusal:

12 The reason given for refusal of the Planning Application to which this Appeal relates is as follows:

“The proposed increase in ridge height to the high-level roof and the resulting external finishing detail to the gable end elevations of the building, the loss of original slate tiles and replacement with unsympathetic cement fibre tiles and installation of photovoltaic panels, by reason of its design, would result in an unsympathetic alterations to the existing building resulting in a detrimental impact upon on the character and appearance of the building and the Royston Conservation Area. No public benefits would outweigh the harm identified to the heritage asset. The proposed development would fail to comply with Policies D1 and HE1 of the North Hertfordshire Local Plan 2011-2031 and Section's 12 and 16 of the NPPF 2024.”

Relevant National Planning Policy:

13 Paragraph 2 of the NPPF states that:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.”

14 Paragraph 8 of the NPPF states that:

“Achieving sustainable development means that the planning system has 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 well-designed, beautiful and safe places, 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 protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

15 Paragraph 9 of the NPPF states that:

“These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”

16 Paragraph 11 of the NPPF states that:

“Plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

17 Paragraph 39 of the NPPF states that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

18 Paragraph 48 of the NPPF states that:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

continued...

19 Paragraph 56 of the NPPF states that:

“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”

20 Paragraph 98 of the NPPF states that:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should...

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community...”

21 Paragraph 161 of the NPPF states that:

“The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

22 Paragraph 163 of the NPPF states that:

“The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.”

continued...

23 Paragraph 165 of the NPPF states that:

“To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);*
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development”*
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”*

24 Paragraph 167 of the NPPF states that:

“Local planning authorities should also 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). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

25 Paragraph 168 of the NPPF states that:

“When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future;*
- b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;*
- c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.”*

26 Paragraph 202 of the NPPF states that:

“Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

27 Paragraph 210 of the NPPF states that:

“In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

28 Paragraph 212 of the NPPF states that:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

29 Paragraph 215 of the NPPF states that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

30 Paragraph 216 of the NPPF states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

30 Paragraph 221 of the NPPF states that:

“Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”

31 The NPPF contains the following definitions:

Conservation (for heritage policy)	<i>“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.”</i>
Designated Heritage Asset	<i>“A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.”</i>
Heritage Asset	<i>“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”</i>
Historic Environment	<i>“All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.”</i>
Renewable and Low Carbon Energy	<i>“Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).”</i>

continued...

Setting of a Heritage Asset:	<i>“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”</i>
Significance (for heritage policy):	The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.

Relevant Local Planning Policy:

- 32 The North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022.
- 33 The Local Plan forms part of the statutory Development Plan for the District that is used to determine applications.
- 34 The Development Plan for North Hertfordshire consists of:

The Local Plan

Neighbourhood Plans for the following areas:

- Ashwell
- Baldock, Bygrave & Clothall
- Ickleford
- Knebworth
- Pirton
- Preston
- Wallington
- Wymondley

The adopted Minerals Local Plan and Waste Local Plan for Hertfordshire

- 35 Local Plan Policy D1 (Sustainable Development) states that:

“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;*

continued...

- 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.”*

36 Local Plan Policy HE1 (Designated Heritage Assets) states that:

“Planning applications relating to Designated heritage Assets or their setting shall be accompanied by a Heritage Assessment/Justification Statement that:

- i. Assesses the significance of heritage assets, including their setting;*
- ii. Justifies and details the impacts of any proposal upon the significance of the designated heritage asset(s); and*
- iii. Informs any necessary measures to minimise or mitigate against any identified harms.*

Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

- a) Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;*
- b) Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and*
- c) Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset’s optimum viable use.*

continued...

Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.”

37 Local Plan Policy HE3 (Non-designated Heritage Assets) states that:

“Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that assesses the scale of harm to, or loss of significance of the non-designated asset and, where the proposal results in the loss of a non-designated heritage asset:

- a) The replacement building contributes to preserving the local character and distinctiveness of the area; and*
- b) Where the asset is located in a conservation area a continuous contract for the demolition and redevelopment of the site has been secured, unless there are justifiable grounds for not developing the site.”*

38 Local Plan Policy NE12 (Renewable and low carbon energy development) states that:

“Proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy. Proposals for other renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon:

- i. Landscape quality, landscape character and visual amenity, including consideration of cumulative impacts of development;*
- ii. Environmental assets;*
- iii. The historic environment, including the impact on the setting of historic assets ;*
- iv. The transport network;*
- v. Air quality;*
- vi. Aviation interests; and*
- vii. The amenity of residents.*

continued...

In assessing renewable and low carbon energy proposals against the above criteria 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 where this is relevant.

Proposals for decentralised energy schemes associated with development of the strategic sites allocated in the Plan will be encouraged subject to an assessment of the impacts.

In all cases, end of life/redundant plant, buildings, apparatus, and infrastructure must be removed and the site restored to its former state or a condition agreed with the Council.”

- 39 Section 9 of North Herts District Council’s Adopted Sustainability SPD addresses how to incorporate energy efficiency and low carbon heating improvements within historic buildings with paragraph 9.24 (Solar Photovoltaic and Solar Thermal) stating that:

“Listed building consent will always be required for the installation of photovoltaic and solar thermal panels.

Panels should avoid harm to the historic fabric. Careful consideration should be given to the location and the impact of associated infrastructure on the historic fabric, external and internal appearance.

The implications of additional loading (due to weight of panels) may need to be considered (consult a structural engineer).

Avoid significant alternation to roof structure

Panels should be located so that they are not overtly visible in short and medium distance views and in longer distance views blend, through product type into the roofscape. This can be achieved by:

Avoiding prominent and highly visible roof slopes of primary elevations

Considering roof slope of rear and secondary elevations

Considering inner roof slope of double pitched, M style roof

Avoiding reflective materials and match the colour of the existing roof covering

continued...

Where ground mounting can be accommodated consider the setting of heritage assets, character and appearance of the conservation area and potential of below ground archaeology

Whilst evacuated tube solar thermal systems are more visible than flat-plate panels, they require less space, and can be well suited to flat roofs.”

- 40 In addition to the above Local Planning Policies, it should be noted that on 21 May 2019, North Herts District Council passed a climate emergency motion. This declaration asserted the council's commitment toward climate action beyond current government targets and international agreements.

Grounds for Appeal:

- 41 The LPA has refused Planning Permission on the basis that the proposed increase in ridge height to the high-level roof and the resulting external finishing detail to the gable end elevations of the building, the loss of original slate tiles and replacement with unsympathetic cement fibre tiles and installation of photovoltaic panels, by reason of its design, would result in an unsympathetic alterations to the existing building resulting in a detrimental impact upon on the character and appearance of the building and the Royston Conservation Area.
- 42 The LPA has determined that no public benefits would outweigh the harm identified to the heritage asset and that, as a result, the proposed development would fail to comply with Policies D1 and HE1 of the North Hertfordshire Local Plan 2011-2031 and Section's 12 and 16 of the NPPF 2024.
- 43 Policies D1 and HE1 are reproduced in paragraphs 35 and 36 of this document.
- 44 It is the Appellants position that the LPA have incorrectly assessed the impact of the proposed works upon both the Locally Listed Building (Heritage Asset) and the surrounding Conservation Area (Designated Heritage Asset), overstating the visual impact on the character and appearance of both assets to create a conflict with Local Plan Policies D1 and HE1 where none exists.
- 45 It is also the Appellants position that the LPA have incorrectly assessed there to be insufficient public benefit to outweigh the 'less than substantial' harm to the heritage assets affected by these proposals despite the Local Plan Policies and NPPF clearly prioritising sustainable development, including measures designed to facilitate the migration to a low carbon economy, resulting in a decision which is contrary to both the intent and content of the NPPF and Local Plan Policy NE12, adopted SPD and the North Herts District Council Climate Emergency Declaration.
- 46 Policy NE12 is reproduced in paragraph 38 of this document, whilst the relevant paragraph of the SPD is reproduced in paragraph 39.
- 47 Furthermore, it is also the Appellants position that, whilst determining the application, the LPA have failed to arrive at a balanced judgement that assesses the scale of harm to the non-designated asset on the basis of the information provided to them during consultation with third parties as required by Local Plan Policy HE3.

continued...

- 48 Finally, it is the Appellants position that objections relating to the palette of materials should have been addressed by the imposition of a relevantly worded condition requiring approval of the proposed materials prior to construction commencing, as per NPPF paragraph 56 (reproduced in para 19 of this document).
- 49 The LPA's Decision Notice identifies four aspects of the proposals which, combined are considered to, by reason of its design, result in unsympathetic alterations to the existing building resulting in a detrimental impact upon on the character and appearance of the building and the Royston Conservation Area, these are:
- the proposed increase in ridge height to the high-level roof;
 - the resulting external finishing detail to the gable end elevations of the building;
 - the loss of original slate tiles and replacement with unsympathetic cement fibre tiles; and
 - The installation of photovoltaic panels.

Proposed increase in ridge height to the high-level roof

- 50 Paragraph 4.3.5 of the Officers Report justifying the decision to refuse the application states that:

"...In order to facilitate the proposed works, the development includes raising the existing roof ridge height of the high-level roof.

The works would involve the installation of insulation between the existing rafters following the removal of the existing roof finishes. It is understood that the proposed insulation would complement the existing insulation already installed under the rafters. To allow for the proposed insulation, the works would require the ridge height of the existing high-level roof to be increased by approximately 21cm.

In general terms, I raise no objection to the principle of an increase in the ridge height as this is considered to be of minimal impact and less than substantial harm at the medium to high end of that continuum if the existing detailing is to be recreated and therefore harmful to the character and appearance of the Conservation Area.

As a result of the likely inability to replicate the existing detailing, I find the proposed alteration to increase the ridge height of the high-level building to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated..."

- 51 This statement is incorrect in how it describes the proposed works to the main meeting hall roof in that it suggests that there is an existing level of insulation ‘under the rafters’ which would be ‘complemented’ by the proposed additional layer of insulation which is not the case.
- 52 The lower roof currently benefits from a layer of existing insulation and, as a result, there are no proposals to introduce additional insulation above the rafters. This is only proposed above the main hall because there is no existing insulation within the fabric and the Appellants do not wish to disturb the existing timber boarding below the rafters which we consider to be historic fabric.
- 53 This error in fact suggests that the officer has failed to understand the nature and extent of the proposed works to the roof of The Old School House.
- 54 Paragraph 4.3.5 then states that:
- “...In general terms, I raise no objection to the principle of an increase in the ridge height as this is considered to be of minimal impact and less than substantial harm at the medium to high end of that continuum if the existing detailing is to be recreated and therefore harmful to the character and appearance of the Conservation Area...”*
- 55 This statement appears to suggest that the impact of raising of the ridge height is ‘minimal’ but that the extension of the existing detailing (red feature brick banding to the edges of the gable) would result in “less than substantial harm at the medium to high end of the continuum”.
- 56 During the determination period of the application the Heritage and Conservation Officer provided a consultation response dated 4th February 2025 (see appendix 1) which stated that:
- “..There is no objection to the raising of the roof ridge to accommodate internal insulation as this is considered to be of minimal impact and not have a negative impact of the character and/or significance of the conservation area and building of local interest...”*
- 57 There appears to be an implied acceptance within the report that the raising of the ridge is necessary to facilitate the installation of the required level of insulation without disturbing the existing historic fabric of the timber cladding and an assessment that this is of minor impact on the character and appearance of both the building in question and the wider conservation area.
- 58 The minor nature of the impact of the raising of the ridge and its lack of impact of the character and/or significance of the conservation area and building of local interest is explicitly stated within the Heritage and Conservation Officer’s initial response.

- 59 Following the initial consultation response, a number of queries were raised with the LPA with regards the comments made by the Heritage and Conservation Officer regards the photovoltaic panels and a subsequent 'informal' response was forwarded by the Planning Officer (see Appendix 2).
- 60 The initial response regarding the raising of the ridge did not alter in the further comments, however the issue of the gable edge detailing was introduced at this stage (see below comments).
- 61 It is, therefore, The Appellants position that the assessment of the impact of the raising of the ridge contained within the Officers Report as 'minor' is not, in and of itself, sufficient to justify refusal of the application as there is no conflict with Local Plan Policies D1, HE1 or HE3.

Resulting external finishing detail to the gable end elevations of the building

- 62 At no point in the initial consultation response from the Heritage and Conservation Officer is the extension of the red feature brickwork mentioned and this response contains no objection to, what would appear to The Appellants to be, a sensible approach to maintaining the character and appearance of the non-designated heritage asset.
- 63 As mentioned above, further 'informal' comments were passed on by the Planning Officer and, at this stage, the Heritage and Conservation Officer states that:

"...However, if the existing detailing is to be recreated then this would sit at the medium to high end of that continuum...." (13th March 2025)

and

"The raising of the roof is of minimal impact and less than substantial harm but at the medium to high end that continuum if the existing detailing is recreated which is my understanding, but I think it will be a difficult process." (3rd April 2025)

- 64 It is a matter of fact that, if the ridge is to be raised to accommodate the insulation, the resulting gap between the new roofline and the existing brickwork has to be mastered. This can be achieved in a number of ways, for example a verge trim or board could be installed to cover the approx. 210mm gap which would result, however this detail would be completely out of keeping with the existing building.
- 65 The planning application to which this appeal relates proposed closing this gap with red facing brickwork to match the existing stepped feature brickwork detail to the gable end. This approach is clearly in keeping with the character and appearance of the existing building and, whilst there would be a visual impact, it is our opinion that this would be less intrusive than the alternative details.

66 As previously stated, the initial consultation response from the Heritage and Conservation Officer makes no objection to this detail, however the secondary 'informal' commentary raises a concern which appears to be focussed on the ability to implement the detail rather than its appearance.

67 Local Plan Policy HE1 states that:

“...Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

a) Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;

b) Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and

c) Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use...”

68 In this instance, the Designated Heritage Asset is the wider conservation area.

69 The proposed brick detailing does not affect the conservation area being used in a manner that secures its conservation and preserves its significance.

70 The proposed materials (i.e. the brickwork) are to match the existing palette of materials and must, therefore, be considered to be in keeping with the local character and distinctiveness of the conservation area.

71 The question is, therefore, would the proposed detail lead to 'less than substantial harm' to the significance of the conservation area and, if so, do the public benefits outweigh this harm.

72 If there was likely to be 'less than substantial harm' to the conservation area we would expect the Heritage and Conservation Officer to have stated as much within their initial response, which they don't.

73 There is no doubt that the resulting detail will alter the visual appearance of the existing building but we would maintain that impact of this change on the overall appearance and character of the building would be minimal and that any 'harm' would be insignificant, certainly at the lower end of the 'less than substantial harm' spectrum.

continued...

- 74 The retention and conservation of a locally listed building in and of itself must be considered to be of public benefit otherwise Local Planning Policy HE3 would not be necessary. The current building's roof is beyond its design life and resulting water ingress is starting to degrade the fabric of the building which, if left unchecked, will eventually render the building unusable.
- 75 As The Old School House is not a Designated Heritage Asset the exemptions from the relevant Building Regulations which would apply to Listed Buildings do not apply and, therefore, any works to replace the existing roof coverings must also include the introduction of insulation.
- 76 As stated in the Design and Heritage Statement contained within the covering letter accompanying the original planning application, The Appellants have carried out significant internal improvements in recent years to facilitate the use of the building as a community asset with various local groups, charities and businesses making use of the facilities. The loss of such a facility within the Town Centre would not be to the benefit of the public.
- 77 It is therefore the Appellants position that there is significant public benefit in retaining the building in a fit and proper state both as a non-designated heritage asset and as a community facility.
- 78 Given the minor nature of the 'less than significant harm' to the wider conservation area caused by the minor change in appearance of the building arising from the extension of the red facing brick feature, it is The Appellants position that the harm is outweighed by the public benefit and that the extension of the red facing brick feature to master the gap between the existing brick and the new roof finishes is not, in and of itself, sufficient to justify refusal of the application as there is no conflict with Local Plan Policies D1, HE1 or HE3

Loss of original slate tiles and replacement with unsympathetic cement fibre tiles

- 79 Paragraph 4.3.6 of the Officers Report justifying the decision to refuse the application states that:

"In addition, the development would involve the removal of the existing slate roof covering and its replacement with a modern cement based imitation tile. No justification has been submitted to evidence the reason(s) as to why the existing slates could not be re-used with limited matching replacements where necessary.

The existing slate roof covering is part of the historic fabric of the building and contributes highly, in my view, to the character and appearance of the Conservation Area. I therefore find the replacement roof tiles to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated."

- 80 The existing roof slates are NOT the original historic fabric of the building which has been replaced at some point in the past with a fibre cement imitation slate.
- 81 The existing roof slates, as stated within the Design and Heritage Statement contained within the covering letter accompanying the original planning application, are well overdue for replacement and there are now signs of significant water ingress internally, particularly in the Meeting Hall.
- 82 It is acknowledged that, at the time of the Planning Application, the nature of the existing roof slates was not clearly articulated within the submitted documentation, however following intrusive investigations to ascertain the existing roof structure, it was confirmed to the LPA (see Appendix 2) that the existing roof coverings appeared to be a fibre cement slate which had deteriorated significantly and were now extremely fragile.
- 83 It was also explained, in the same correspondence, that the proposed roof slate sought to replace like for like.
- 84 We note that, again, the initial consultation response from the Heritage and Conservation Officer makes no objection to this material despite the bulk of the application proposals centring on the replacement of the roof coverings.
- 85 We also note that Paragraph 56 of the NPPF states that:
- “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations...”*
- 86 Given that this particular element of the Reason for Refusal relates to material choices rather than a fundamental principal of the proposed works, it is The Appellants position that this part of the objection could have been made subject to a suitably worded condition requiring approval of external materials by the LPA, in writing, prior to commencement of building works.

continued...

Installation of photovoltaic panels.

87 Finally, paragraph 4.3.7 of the Officers Report justifying the decision to refuse the application states that:

“The final aspect of the development would include the installation of a number of photovoltaic solar panels to the southeast facing roof slope of the high-level building. The panels are shown to be integrated within the proposed roof structure and would therefore display a flush external finish.

Given the longer views of the roof slope from a southeast point in Market Hill and Fish Hill, I am of the view that the proposed panels would be highly visible from the public domain and would sit at the less than substantial medium to high end of the continuum.

I therefore find the installation of the proposed panels to be inappropriate and unacceptable due to the fact that the harm would outweigh the public benefit.

I therefore find the replacement roof tiles to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated.”

88 Paragraph 4.3.14 of the Officers Report does acknowledge the following:

“The proposed installation of photovoltaic panels would make a positive contribution towards energy savings and the proposed insulation would be likely to improve the overall energy efficiency of the building, however, whilst the development may comply with the broad requirements of Section 14 of the NPPF, para 167 also requires development to accord with other planning policies and in particular Section 16 of the NPPF and Policy D1 of the Local Plan which, in my view, the proposal fails to do for the reasons evidenced.”

89 The consultation response from the Heritage and Conservation Officer states that:

“There is an objection to the installation of the pv panels on the flank roof as this is considered to cause harm to the character and appearance of the conservation area by changing the appearance of the roof...The proposed PV panels are considered to cause harm to the character of the conservation area as they would be visible from both Market Hill and Fish Hill. Although there are intermediate buildings which may reduce the visual impact the expanse of the proposed pv panels overall the proposed will not enhance the character of the conservation area. Any development should seek to enhance or better reveal the character and appearance.”

continued...

- 90 In 2019, North Herts District Council passed a motion to declare a Climate Emergency, in this motion the council pledged their commitment to do everything within its power to make North Hertfordshire Carbon Zero by 2030. This declaration asserted the council's commitment toward Climate Action beyond current government targets and international agreements.
- 91 Paragraph 8 of the NPPF published in December 2024 states that one of the three overarching objectives of the planning system is to:
- "... protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*
- 92 The importance of this objective is reflected throughout the NPPF, both at a strategic plan making level right the way through to decision making.
- 93 Paragraph 9 states that:
- "...Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."*
- 94 Paragraph 39 of the same document states that:
- "Decision-makers at every level should seek to approve applications for sustainable development where possible"*
- 95 Paragraph 98 states that:
- "To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community..."*
- 96 Paragraph 161 states that:
- "The planning system should support the transition to net zero by 2050 and take full account of all climate impacts...It should...encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*

continued...

97 Paragraph 163 states that:

“The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.”

98 Paragraph 167 states that:

“Local planning authorities should also 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). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

99 The importance of the need to shift to a zero-carbon economy is also reflected in the North Hertfordshire Local Plan 2011-2031, for example, Local Plan Policy D1 states that:

“Planning permission will be granted provided that the development proposals....reduce energy consumption and waste...”

100 Local Plan Policy NE12 states that:

“Proposals for other renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon... The historic environment, including the impact on the setting of historic assets...

In assessing renewable and low carbon energy proposals against the above criteria 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 where this is relevant.”

101 Given this policy context, it is The Appellants position that the installation of photovoltaic panels should be deemed to have ‘significant’ weight when the proposals are assessed against Local Plan Policies, particularly those relating to the historic environment.

102 The Heritage and Conservation Officer’s objection is predicated on the basis that harm would be caused to the conservation area because the photovoltaic panels would be visible, albeit that intermediate buildings may reduce the visual impact the expanse of the proposed pv panels.

- 103 This then leads them to conclude that overall the proposals will not enhance the character of the conservation area when, in their opinion, any development should seek to enhance or better reveal the character and appearance.
- 104 We recognise that the Heritage and Conservation Officer is NOT tasked with making a balanced judgement with regards the scheme proposals, their role is to provide an assessment of the impact of the proposals on heritage assets.
- 105 However, the NPPF requires planning officers to seek to approve applications for sustainable development where possible (para 39), weigh any less than substantial harm to a designated heritage asset against the public benefits of the proposals (para 215) and make a balanced judgement on the impact of proposals on a non-heritage asset with regards the scale of any harm (para 216)
- 106 The Local Plan also requires Planning Officers to give significant weight to the local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, of renewable and low carbon energy proposals when assessing applications in the wider context of the North Herts District Council pledge to do everything within its power to make North Hertfordshire Carbon Zero by 2030
- 107 The officer's report does acknowledge that the installation of photovoltaic panels would make a positive contribution towards energy savings and the proposed insulation would be likely to improve the overall energy efficiency of the building (para 4.3.14) however, the officer does not appear to attribute this with any significant weight when stating in paragraph 4.3.7 that:
- "Given the longer views of the roof slope from a southeast point in Market Hill and Fish Hill, I am of the view that the proposed panels would be highly visible from the public domain and would sit at the less than substantial medium to high end of the continuum. I therefore find the installation of the proposed panels to be inappropriate and unacceptable due to the fact that the harm would outweigh the public benefit."*
- 108 We note that the NPPF acknowledges, within its definitions, that conservation of a heritage asset is a process of maintaining and managing change in a way that sustains and, where appropriate, enhances its significance and that the surroundings in which a heritage asset is experienced are not fixed and may change as the asset and its surroundings evolve.
- 109 Whilst the proposed development involves changes visible from the public realm, it is submitted that the decision fails to adequately balance the statutory duty to preserve heritage with the urgent and material planning considerations related to climate change, as recognized in both local and national policy.

- 110 The visibility of PV panels from the public realm does not amount to substantial harm to the conservation area. Any harm that might occur is less than substantial, and is significantly outweighed by the environmental and public benefits of renewable energy generation in response to the climate emergency
- 111 Conservation areas are not intended to be fossilised, static environments. Historic England guidance recognises that sensitive adaptation is essential to ensure the long-term sustainability of heritage assets. In the context of a declared climate emergency, recognised by North Hertfordshire District Council itself, there is an imperative to enable low-impact renewable energy interventions, even in designated areas.
- 112 Refusing renewable energy measures on heritage grounds without appropriately weighing climate obligations is contrary to national legal duties and policy. Conservation areas must evolve to remain relevant and sustainable. Denying adaptation risks eroding their value by rendering them obsolete or burdensome to maintain.
- 113 The proposed PV panels are consistent with Local Plan Policy NE12 in promoting low-carbon technology, and with Local Plan Policy SP1 in supporting sustainable development. The panels are a reversible, non-invasive intervention that does not undermine the long-term significance of the conservation area. In fact, the modest visual impact is an acceptable trade-off in achieving wider environmental sustainability.
- 114 It is therefore The Appellants position that the proposed installation of PV panels represents a modest, reversible intervention that is entirely consistent with national and local policy promoting sustainability and low-carbon development. Whilst visible from the public realm, the impact on the conservation area is minor and does not constitute substantial harm. Even if less than substantial harm is found, the public benefit of supporting renewable energy and tackling climate change clearly outweighs it.

Third Party Representations:

- 115 We note that, despite advertising the Planning Application and notifying neighbours and Royston Town Council, no third-party representations were made by members of the public.
- 116 Royston Town Council raised no objection to the proposals.
- 117 Comments from the LPA's Senior Historic Environment Advisor were received on 23rd December 2024 which can be found in Appendix 4 of this document.

Conclusion

- 118 The Planning Application to which this Appeal relates is for the replacement of the existing fibre cement roof coverings and installation of additional insulation and flush mounted photovoltaic panels at The Old School House, Market Hill, Royston.
- 119 The Appeal Site is a Non-designated Heritage Asset comprising of part of the Former Royston National School which was built in 1886 for the children of Church of England families of Royston and comprises two distinct elements; the part of the application site which fronts Fish Hill is predominantly a single storey flint building with gault brick dressings, chimneys and a small bell tower whilst the remainder comprises a tall, gable ended, building in yellow brick with red feature brickwork which fronts both Fish Hill and Market Hill. Both elements of the building are roofed with a fibre cement roof slate.
- 120 The existing fibre cement roofing slates on both parts of The Old School House are well overdue for replacement and there are now signs of significant water ingress internally, particularly in the Meeting Hall.
- 121 In order to ensure the continued viability of the building and prevent the building deteriorating the Appellants wish to replace the existing roof finishes and, to improve the suitability of the building, wish introduce flush mounted photovoltaic panels whilst carrying out the reroofing works.
- 122 As the Appeal site is not a Designated Heritage Asset, the exemptions from the relevant sections of the Building Regulations that would apply to a Listed Building do not apply to The Old School House and, therefore, any replacement of the roof finishes must involve improving the insulation levels of the roofs.
- 123 Whilst the roof above the single storey element of the Appeal Site has already been upgraded internally, the higher roof benefits internally from timber boarding which is considered to be historic fabric and, therefore, any additional insulation must be installed over and between the existing roof structure rather than between and under, leading to an increase in the ridge height of this element.
- 124 To overcome the gap between the existing brickwork and proposed roof finishes, it is proposed to continue and extend the existing stepped red feature brickwork at the gable ends using a brick which matches the existing.
- 125 The existing building does not benefit from gas supplies. Space heating of the various rooms as well as the hot water services is provided by an efficient electric boiler. The installation of photovoltaic panels is intended to reduce the buildings reliance on mains electricity, reducing running costs and the associated carbon footprint of the building to ensure that it benefits from a sustainable future.

126 The planning application was refused on the basis that:

“The proposed increase in ridge height to the high-level roof and the resulting external finishing detail to the gable end elevations of the building, the loss of original slate tiles and replacement with unsympathetic cement fibre tiles and installation of photovoltaic panels, by reason of its design, would result in an unsympathetic alterations to the existing building resulting in a detrimental impact upon on the character and appearance of the building and the Royston Conservation Area. No public benefits would outweigh the harm identified to the heritage asset. The proposed development would fail to comply with Policies D1 and HE1 of the North Hertfordshire Local Plan 2011-2031 and Section's 12 and 16 of the NPPF 2024.”

127 The minor nature of the impact of the raising of the ridge and its lack of impact of the character and/or significance of the conservation area and building of local interest is explicitly stated within the Heritage and Conservation Officer’s initial consultation response (Appendix 1).

128 It is The Appellants position that the assessment of the impact of the raising of the ridge contained within the Officers Report as ‘minor’ is not, in and of itself, sufficient to justify refusal of the application as there is no conflict with Local Plan Policies D1, HE1 or HE3.

129 Given the minor nature of the ‘less than significant harm’ to the wider conservation area caused by the minor change in appearance of the building arising from the extension of the red facing brick feature, it is also The Appellants position that this harm is outweighed by the public benefit and that the extension of the red facing brick is not, in and of itself, sufficient to justify refusal of the application as there is no conflict with Local Plan Policies D1, HE1 or HE3.

130 The existing roof slates are NOT the original historic fabric of the building which has been replaced at some point in the past with a fibre cement imitation slate which are well overdue for replacement. Given that this particular element of the Reason for Refusal relates to material choices rather than a fundamental principal of the proposed works, it is The Appellants position that this part of the objection could have been made subject to a suitably worded condition requiring approval of external materials by the LPA, in writing, prior to commencement of building works.

132 Conservation areas are not intended to be fossilised, static environments and, in the context of a declared climate emergency, there is an imperative to enable low-impact renewable energy interventions, even in designated areas. Conservation areas must evolve to remain relevant and sustainable. Denying adaptation risks eroding their value by rendering them obsolete or burdensome to maintain.

- 133 The installation of photovoltaic panels aligns with the NPPF's commitment to climate action and renewable energy, meets the sustainability and renewable energy objectives of the North Hertfordshire Local Plan (Policies NE12 and D1), causes minimal impact to the Royston Conservation Area and to the non-designated heritage asset, represents a reversible intervention that balances heritage and sustainability, supports the Council's own declaration of a climate emergency, and delivers meaningful public benefit that clearly outweighs any perceived harm.
- 134 It is, therefore, the Appellants position that, whilst determining the application, the LPA have failed to arrive at a balanced judgement that assesses the scale of harm to the non-designated asset on the basis of the information provided to them during consultation with third parties, as required by Local Plan Policy HE3, against the significant public benefit of low carbon and renewable technologies outlined in both National and Local Planning Policy.
- 135 It is also the Appellants position that none of the proposed intervention in and of themselves form sufficient reason to refuse the application nor is there sufficient harm to the character and appearance of the conservation area when these elements are combined to justify a refusal.
- 136 Finally, it is the Appellants position that objections relating to the palette of materials should have been addressed by the imposition of a relevantly worded condition requiring approval of the proposed materials prior to construction commencing, as per NPPF paragraph 56 (reproduced in para 19 of this document).
- 137 It is, therefore, our opinion that the proposed scheme should have been granted Planning Permission and we respectfully request that the Planning Inspector allow this Appeal.

Photographs



View towards site from Market Hill



View towards site from Market Hill



View towards site from Market Hill



View of site from Market Hill



View of site from Market Hill



View towards site from bottom of Market Hill



View towards site from Church Lane



View of site from bottom of Fish Hill



View of site from Fish Hill



View of site from Fish Hill



View towards site from Fish Hill



View towards site from Fish Hill

Appendix 1: Heritage and Conservation Officer's Consultation Response.

Heritage & Conservation

Application consultation response

Application reference:	24/02696/fp
Site:	The Old School House 4 Market Hill Royston
Proposal	Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.
Action required prior to determination:	No (see below)

Summary

There is an objection to the installation of the pv panels on the flank roof as this is considered to cause harm to the character and appearance of the conservation area by changing the appearance of the roof.

There is no objection to the raising of the ridge height as this is minimal and will not cause harm.

Heritage Assets

Building of Local Interest
Conservation Area

Discussion

The proposed PV panels are considered to cause harm to the character of the conservation area as they would be visible from both Market Hill and Fish Hill. Although there are intermediate buildings which may reduce the visual impact the expanse of the proposed pv panels overall the proposed will not enhance the character of the conservation area. Any development should seek to enhance or better reveal the character and appearance.

There is no objection to the raising of the roof ridge to accommodate internal insulation as this is considered to be of minimal impact and not have a negative impact of the character and/or significance of the conservation area and building of local interest.

Heritage Policy Assessment

The Planning (Listed Building and Conservation Areas) Act 1990

Section 26H of the Planning (Listed Buildings and Conservation Areas) Act 1990 or Sections 16 (1) & 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and as supported by the aims of the NPPF.

The Local Plan and NPPF

North Hertfordshire Local Plan 2011-2031 and the policies contained within it i.e., Policy HE1. The plan was adopted November 2022.

The relevant paragraph numbers at Section 16 of the July 2021 version of the NPPF have been changed as follows:

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.....

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – December 2017

At para 14 under the sub-heading 'Landscape Assessment and Amenity' it states that "Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. **Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.**"

At para 17 it states (my emphasis in bold): "All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. **Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it.** This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (i.e. the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

Conclusion

For the reasons given above it is felt that in heritage terms:

The proposed photo voltaic panels would not preserve the architectural and/or historic interest of the local listed building and therefore does not comply with sections 16 (1) of the Act.

The proposed photo voltaic panels would not preserve the character and/or appearance of the conservation area and does not comply with section 72 (1) of the Act.

There is an **OBJECTION**. The scheme will not satisfy the provisions of Sections 16(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the aims of Section 16 of the NPPF and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

From	Tricia Craggs
Date	4.2 2025

Appendix 2: Chain of correspondence with Planning Officer relating to Heritage and Conservation Officer's further comments.

From: [Vicki Wood](#)
To: info@aandds.co.uk
Subject: 4 Market Hill, Royston
Date: 04 February 2025 14:37:46
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Conservation Comments 4 Market Hill Royston.docx](#)
Importance: High

Hi Mark,

Please see attached comments on the application from the Conservation Officer.

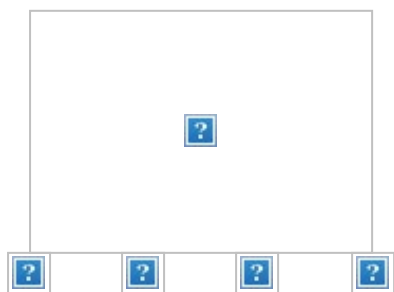
Given the extended time to date, I would like to give you the opportunity to amend the drawings to omit the photovoltaic panels.

I am aware that this would involve a further extension of time, therefore if you could let me know if you would like to amend the drawings and timescale for receipt, I can factor this in in terms of any further request.

Look forward to hearing from you.

Please note that any opinion expressed in this email is not binding on the Local Planning Authority.

Kind Regards



Vicki Wood
Planning Officer

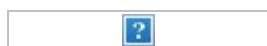
01462 474158

www.north-herts.gov.uk

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From: info@aandds.co.uk
To: "Vicki Wood"
Cc: [REDACTED]
Subject: 24/02696/fp: 4 Market Hill, Royston
Date: 04 February 2025 17:07:00
Attachments: [image001.png](#)
[image003.png](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[image008.jpg](#)
[Conservation Comments 4 Market Hill Royston.docx](#)
[image002.png](#)

9 Sunny Hill,
Buntingford,
Hertfordshire.
SG9 9HP
T: 07976 869 532

Dear Vicki

Thanks for your email.

I did speak with the Conservation Officer this morning as she rang to query which part of the roof it was proposed to mount the photovoltaic panels and indicated, during our conversation, that she was potentially unhappy with the impact of the proposed modules but it was also clear that she was relying on photographs and the drawings rather than a site visit.

We note that the Conservation Officer has not indicated whether or not she believes the impact on the Conservation Area to be 'less than substantial' or 'substantial' which, we believe, is an important first step to establish so that the LPA can arrive at a balanced decision on the application.

We have never sought to argue that there will be no impact upon the appearance of the Conservation Area as even the most benign alteration to a building or structure will have a visual impact, however it is our opinion that the impact is 'less than substantial' on the character and appearance of the Conservation Area and that both National and Local Planning Policy requires the LPA to give significant weight to the need to support sustainable technologies, even within Conservation areas.

I refer you to Paragraph 167 of the revised NPPF which states that:

"Local planning authorities should also 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).

Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework."

As these proposals constitute a small-scale PV development, it is our opinion that Paragraph 168 of the revised NPPF is relevant in that it states:

"When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should ... recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions..."

Both the above paragraphs make it clear that low carbon developments should be both recognised as making a valuable contribution to cutting greenhouse gas emissions and, as such, should be given significant positive weight.

We also note that Paragraph 215 of the revised NPPF states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

If the harm arising from the proposed PV Panels is considered "less than substantial", we would argue that the public benefit arising from securing the optimal viable use of an increasingly important community focussed building with the Town Centre is significant and that this paragraph requires the LPA to make a balanced judgement on the application.

Paragraph 216 of the revised NPPF also indicates that a balanced judgement will be required when it states that:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

Finally, North Herts Local Plan Policy HE1 (Designated Heritage Assets) states that:

"...Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

- a. Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;*
- b. Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and*
- c. Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.*

Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss."

We would therefore request that you confirm, with your conservation team, whether or not they believe the impact to be 'substantial' or 'less than substantial'. If it is the later we would argue that the benefit of the photovoltaic panels is substantial both with regards carbon reduction and with regards ensuring that the locally listed building can continue as a viable asset and that national and local planning policies would indicate that Planning Permission should be granted accordingly.

If, having established the extent to which the Conservation Officer believes the wider Conservation Area will be harmed, you believe that a balanced judgement would find that the flush mounted PV Panels are unacceptable then we would be happy to have a further discussion with you as to how best to proceed with the application.

I trust that makes sense but feel free to give me a ring on 07976 869 532 if you wish to discuss.

Yours Faithfully

Mark Cotton BA (arch); Dip Arch. RIBA
Director

For and on behalf of
architecture & design services ltd.



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From: [Vicki Wood](#)
To: info@aandds.co.uk
Subject: RE: 24/02696/FP - 4 Market Hill, Royston
Date: 13 March 2025 08:26:08
Attachments: [image002.png](#)
[image003.jpg](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image009.png](#)
[image010.jpg](#)
[image011.png](#)
[image012.png](#)
[image013.jpg](#)
[image014.jpg](#)
[image001.png](#)

Good morning Mark,

I hope you have been able to enjoy some time away.

Having received a response from my colleague in the Conservation Team I do not consider I am able to support the application based on the following:

1. In terms of raising the roof ridge height, this would have minimal impact and so considered less than substantial harm. However, if the existing detailing is to be recreated then this would sit at the medium to high end of that continuum.
2. The existing tiles are slate and part of the historic fabric of the building, no justification has been put forward to support a change to a modern cement based slate imitation tile. Although imitation tiles may be manufactured to look like natural slate, there is a visible difference.
3. There is no doubt that the PV panels will be visible from the public domain. Para 200 of the NPPF sets out that proposals should enhance and conserve the character of the area. There is no doubt that the panels would be visible from Fish Hill and Market Hill and so the harm would be less than substantial but to the medium to high end of that continuum.
4. In terms of the internal impact to the raft structure, this would be dependant on method used, perhaps the use of TLX Gold insulation could be an option to investigate further, this would have an impact on ridge height.

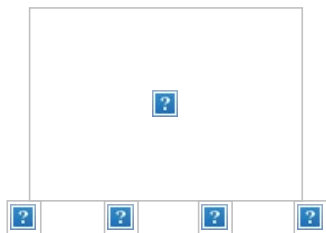
Unfortunately, due to the high level of intervention which is considered will cause less than substantial harm at the medium to high continuum to both the designated heritage asset and the Royston Conservation Area I am not able to put forward a recommendation for approval in this case.

If the application is not withdrawn it is my intention to proceed towards a recommendation for refusal based on the above.

Look forward to hearing from you.

Please note that any opinion expressed in this email is not binding on the Local Planning Authority.

Kind Regards



Vicki Wood
Planning Officer

01462 474158

www.north-herts.gov.uk

From: info@aandds.co.uk
To: "Vicki Wood"
Bcc: "Paul Brown"
Subject: RE: 24/02696/FP - 4 Market Hill, Royston
Date: 20 March 2025 10:07:00
Attachments: [image001.png](#)
[image003.png](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[image008.jpg](#)
[image009.png](#)

9 Sunny Hill,
Buntingford,
Hertfordshire.
SG9 9HP
T: 07976 869 532

Dear Vicki

Thanks for the email(s) and apologies for the delay in responding to you, as you know I have been on annual leave and only returned to the office this morning.

Regards the request for an extension to the determination period, we are happy for this to be extended until next Friday (28th March) to allow everyone time to respond to the points made by your conservation team etc.

I note that the later response from Conservation is not yet available on your website, could you please let me have a copy of their comments for review?

Regards the comments contained within your email of the 13th, please find below our responses:

"In terms of raising the roof ridge height, this would have minimal impact and so considered less than substantial harm. However, if the existing detailing is to be recreated then this would sit at the medium to high end of that continuum."

This comment is somewhat confusing as it suggests that the preferred option for building up the gables is for us NOT to extend the existing red brick feature band which, in our opinion, would have a significantly detrimental impact upon the appearance and character of the building. Can you please clarify?

It is our opinion that extending the existing brick detail would have a minimal detrimental impact upon the appearance and character of the building.

"The existing tiles are slate and part of the historic fabric of the building, no justification has been put forward to support a change to a modern cement based slate imitation tile. Although imitation tiles may be manufactured to look like natural slate, there is a visible difference."

This statement is incorrect. Having carried out some intrusive investigations to ascertain the existing roof structure, we can confirm that the existing roof coverings appear to be a fibre cement slate (as noted on the submitted drawings) which have deteriorated significantly and are now extremely fragile. The proposed roof slate simply seeks to replace like for like (as best we can).

We have no doubt that the original roofing material would have been slate but it appears that, at some point in the last 140 odd years, that original roof covering has been replaced.

We note that the actual materials to be used can be covered off by way of a pre-commencement condition to allow further investigations/discussions.

"There is no doubt that the PV panels will be visible from the public domain. Para 200 of the NPPF sets out that proposals should enhance and conserve the character of the area. There is no doubt that the panels would be visible from Fish Hill and Market Hill and so the harm would be less than substantial but to the medium to high end of that continuum."

We refer you to our previous email regards the Local Plan Policies. We have never sought to suggest that there will not be an impact on the appearance of the Conservation Area but believe that, as this is less than substantial, the Local Plan policies support the principal of carbon reduction technologies and renewables even within sensitive areas such as the Conservation Area.

Given the need to work towards Net Zero, the central and local government policies that flow from this need and the fact that the country's oldest buildings are some of our most inefficient, it cannot be the LPA's position that PV panels are unacceptable within a Conservation Area.

"In terms of the internal impact to the raft structure, this would be dependent on method used, perhaps the use of TLX Gold insulation could be an option to investigate further, this would have an impact on ridge height."

The method for insulating the existing roofs is shown on the submitted drawings and seeks to achieve the U-Values required by

the Building Regulations without significant impact upon the historic fabric of the roof, resulting is no loss of or impact upon the historic fabric other than the replacement of the friable fibre cement slates and battens.

TLX Gold, whilst useful in many situations, can only achieve the required U-values with the addition of a layer of PIR Insulation between the existing rafters. This would then also require the introduction of a vapour control layer below the rafters to prevent moisture getting into the rafter zone which, in turn, would then require the removal of the original timber boarding internally which, in our opinion, would fundamentally affect the internal appearance of the main hall.

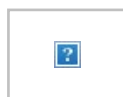
I'd be grateful if you could send across the recent conservation officers' comments and also provide your thoughts on the above.

Have a good week.

Yours Faithfully

Mark Cotton BA (arch); Dip Arch. RIBA
Director

For and on behalf of
architecture & design services ltd.



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From: Vicki Wood
To: info@aandds.co.uk
Subject: RE: 24/02696/FP - 4 Market Hill, Royston
Date: 03 April 2025 14:11:22
Attachments: [image002.png](#)
[image010.jpg](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image016.png](#)
[image017.jpg](#)
[image018.png](#)
[image019.png](#)
[image020.jpg](#)
[image021.jpg](#)
[image003.png](#)

Hi Mark,

Thank you for your email and apologies for the delay in responding.

The comments from Conservation were informal and in response to some questions I raised, hence them not being on the website but I am happy to share this with you, see below:

1. The raising of the roof in terms of the impact as a result of the infilling between the stepped tiles and roof tiles. **The raising of the roof is of minimal impact and less than substantial harm but at the medium to high end that continuum if the existing detailing is recreated which is my understanding, but I think it will be a difficult process.**
2. The impact of the replacement roof tiles. **The existing tiles are slate and historic fabric, and no real justification has been given for the change to a modern cement based slate imitation tile. Although manufactured to look like slate there is a visible difference. Again, there has been no justification to replace the original slates.**
3. The impact of the photovoltaic panels. –
As per previous comments the PV panels will be visible from the public domain. Development or alteration in a conservation area should seek to enhance and conserve the character of the area. I would refer to para 200 of the NPPF in this particular instance. So in terms of harm I would put this at less than substantial but to the medium to high end of that continuum for the reasons stated. As previously stated this harm will have to weighed against the public benefit if any that flows from the intervention.
4. Any internal impact to the rafter structure. **The proposed insulation to the Meeting Hall is dependent on whether there is an agreement to the raising of the roof as to which method of insulation is used. As per the D&A statement submitted but the agent the**

"Installing insulation below and between these rafters would result in the removal of the timber boarding and the partial obscuring of the trusses whilst insulating over and between the same rafters would preserve these elements but would result in an increase in the height of the existing roof"

"The preferred solution for the high-level roof over the Meeting Hall is driven by the desire to preserve the visibility of the existing historic fabric inside the building. Whilst this will require an increase to the ridge height of the existing building, it is our view that the increase is minor considering the overall height of the existing building and will not result in an adverse impact upon the character of the building nor the surrounding conservation area".

In summary I think this scheme involves a high level of intervention which will cause less than substantial harm at the medium to high continuum to both the designated heritage asset in this case Royston Conservation Area and to the Building of Local Interest.

Please feel free to comment further should you wish but in the meantime I hope to progress the application during the course of next week.

Please note that any opinion expressed in this email is not binding on the Local Planning Authority.

Kind Regards



Vicki Wood
Planning Officer

01462 474158

www.north-herts.gov.uk

From: info@aandds.co.uk <info@aandds.co.uk>

From: info@aandds.co.uk
To: "Vicki Wood"
Cc: [REDACTED]
Subject: RE: 24/02696/FP - 4 Market Hill, Royston
Date: 04 April 2025 09:50:00
Attachments: [image001.png](#)
[image003.png](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)
[image007.jpg](#)
[image008.jpg](#)
[image002.png](#)

9 Sunny Hill,
Buntingford,
Hertfordshire.
SG9 9HP
T: 07976 869 532

Dear Vicky

Thanks for forwarding me the comments from the Conservation Officer but, to be honest, they don't really add anything to the information we have already received from you.

Can you please address our comments from our original email which were as follows:

"In terms of raising the roof ridge height, this would have minimal impact and so considered less than substantial harm. However, if the existing detailing is to be recreated then this would sit at the medium to high end of that continuum."

This comment is somewhat confusing as it suggests that the preferred option for building up the gables is for us NOT to extend the existing red brick feature band which, in our opinion, would have a significantly detrimental impact upon the appearance and character of the building. Can you please clarify?

It is our opinion that extending the existing brick detail would have a minimal detrimental impact upon the appearance and character of the building.

"The existing tiles are slate and part of the historic fabric of the building, no justification has been put forward to support a change to a modern cement based slate imitation tile. Although imitation tiles may be manufactured to look like natural slate, there is a visible difference."

This statement is incorrect. Having carried out some intrusive investigations to ascertain the existing roof structure, we can confirm that the existing roof coverings appear to be a fibre cement slate (as noted on the submitted drawings) which have deteriorated significantly and are now extremely fragile. The proposed roof slate simply seeks to replace like for like (as best we can).

We have no doubt that the original roofing material would have been slate but it appears that, at some point in the last 140 odd years, that original roof covering has been replaced.

We note that the actual materials to be used can be covered off by way of a pre-commencement condition to allow further investigations/discussions.

"There is no doubt that the PV panels will be visible from the public domain. Para 200 of the NPPF sets out that proposals should enhance and conserve the character of the area. There is no doubt that the panels would be visible from Fish Hill and Market Hill and so the harm would be less than substantial but to the medium to high end of that continuum."

We refer you to our previous email regards the Local Plan Policies. We have never sought to suggest that there will not be an impact on the appearance of the Conservation Area but believe that, as this is less than substantial, the Local Plan policies support the principal of carbon reduction technologies and renewables even within sensitive areas such as the Conservation Area.

Given the need to work towards Net Zero, the central and local government policies that flow from this need and the fact that the country's oldest buildings are some of our most inefficient, it cannot be the LPA's position that PV panels are unacceptable within a Conservation Area.

"In terms of the internal impact to the raft structure, this would be dependent on method used, perhaps the use of TLX Gold insulation could be an option to investigate further, this would have an impact on ridge height."

The method for insulating the existing roofs is shown on the submitted drawings and seeks to achieve the U-Values required by the Building Regulations without significant impact upon the historic fabric of the roof, resulting in no loss of or impact upon the historic fabric other than the replacement of the friable fibre cement slates and battens.

TLX Gold, whilst useful in many situations, can only achieve the required U-values with the addition of a layer of PIR Insulation between the existing rafters. This would then also require the introduction of a vapour control layer below the rafters to prevent moisture getting into the rafter zone which, in turn, would then require the removal of the original timber boarding internally

which, in our opinion, would fundamentally affect the internal appearance of the main hall.

Yours Faithfully

Mark Cotton BA (arch); Dip Arch. RIBA
Director

For and on behalf of
architecture & design services ltd.



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From: [Vicki Wood](#)
To: info@aandds.co.uk
Subject: RE: 24/02696/FP - 4 Market Hill, Royston
Date: 04 April 2025 16:15:15
Attachments: [image009.png](#)
[image010.jpg](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image016.png](#)
[image017.jpg](#)
[image018.png](#)
[image019.png](#)
[image020.jpg](#)
[image021.jpg](#)
[image002.png](#)

Hi Mark,

I have taken into account the points made by yourself and the comments made by the Conservation Officer and I am of the opinion that the harm to the building and to the character and appearance of the conservation area would outweigh the benefits and so it is my intention to proceed with a recommendation for refusal unless of course you wish to withdraw the application. If you wish to withdraw the application, please let me know no later than Tuesday the 8th April.

Please note that any opinion expressed in this email is not binding on the Local Planning Authority.

Kind Regards



Vicki Wood
Planning Officer

01462 474158

www.north-herts.gov.uk

Appendix 3: Officers Report

DELEGATED FILE NOTE

CASE OFFICER: ...Vicki Wood.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
24/02696/FP	Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.	The Old School House 4 Market Hill Royston Hertfordshire SG8 9JL

Submitted Plan Nos

19-010-A-001 19-010-A-005 19-010-A-006

1.0 Policies

1.0 **Local and National Policy**

1.1 **National Planning Policy Framework 2024 (NPPF)**

Section 2 – Achieving sustainable development

Section 12 – Achieving well-designed places

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

Section 16 – Conserving and enhancing the historic environment

1.2 **North Hertfordshire Local Plan 2011-2031 (NHLP)**

Strategic Policies

Policy SP1 – Sustainable development in North Hertfordshire

Policy SP2 – Settlement Hierarchy and Spatial Distribution

Policy SP9 – Design and Sustainability

Policy SP13 – Historic environment

Development Management Policies

Policy D1 – Sustainable Design

Policy D3 – Protecting living conditions

Policy ETC5 – Secondary Shopping Frontages

Policy HE1 – Designated heritage assets

Policy HE4 – Archaeology

Policy SP4 – Town Centres

2.0 **Relevant Site History**

2.1 00/01684/1 - Change of use from retail to cafe and meeting room with ancillary facilities. Conditional Permission.

3.0 **Representations**

3.1 **Press, Site and Neighbour Consultation** – None received.

3.2 **Royston Town Council** – No objection.

3.3 **HCC Archaeology** – Development likely to impact on heritage assets of archaeological interest. Conditions recommended re: interventions to the fabric of the building.

3.4 **NHC Conservation Officer** – Objection based on degree of less than substantial harm.

4.0 **Planning Considerations**

4.1 **Site and Surroundings**

4.1.1 The building occupies a prominent position south of The Old Court House to the north and is situated between the parallel streets known as Market Hill and Fish Hill in the Royston Conservation Area. A distinct feature of part of the building is its steep pitched roof with gable end's fronting both Hill's. The elevation fronting Fish Hill is predominantly single storey. As a result of the steep roof height, longer views of the building and its roof slope can be seen from Market Hill to the west, north and south and from Fish Hill to the east and south. Both elevations benefit from original yellow

brickwork with an attractive red brick feature design to the eaves and other elements of the design construction.

4.1.2 History shows the building was formerly an old schoolhouse and is within the Royston Conservation Area and is designated as a Building of Local Interest (BLI) on the Register for Royston dated 27th March 2007. The BLI entry states: *'Former Royston National School, Fish Hill The National School was built in 1886 for the children of Church of England families of Royston. It is a flint building with gault brick dressings and chimneys. Its location between Fish Hill and Market Hill results in it fronting and contributing to both streets. The school provides a strong building line to both streets and has an enclosed courtyard facing onto Market Hill. The angled chimneys in gault brickwork at regular positions along the eaves make a particular architectural contribution. The use of flint is a characteristic within the town and is emphasised on the building's Market Hill elevation.'* The reason for inclusion on the BLI Register stating: *'Building of local interest to the social and educational history of the town constructed in local materials strongly characteristic of the town.'*

4.1.3 The application site is within the settlement boundary for Royston where development is generally acceptable subject to planning policy.

4.2 **Proposal**

4.2.1 Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.

4.2.2 The application is accompanied by a Design and Heritage Statement dated 26th November 2024.

4.3 **Key Issues**

4.3.1 The key issues for consideration are as follows:

- The acceptability of the design of the proposed development and its resultant impact on the character and appearance of the BLI and the Royston Conservation Area.
- The impact that the proposed development would have on the living conditions of neighbouring properties.
- The impact that the proposed development would have on the environment.

Design, Appearance and Impact on the Conservation Area:

4.3.2 Within a Conservation Area, the Council has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of the Listed Building and Conservation Areas Act (1990). Furthermore, Section 16 of the NPPF sets out guidance relating to sustaining and enhancing heritage assets. In this regard, Policy HE1 of the NHLP is consistent with the NPPF.

4.3.3 When considering the impact of proposed development on the significance of a designated heritage asset (such as a Conservation Area), the NPPF notes that great weight should be given to the asset's conservation; the more important the asset, the greater the weight should be.

4.3.4 The objectives of the National Planning Policy Framework (NPPF) include those seeking to secure the creation of high quality, beautiful and sustainable buildings and

places (Section 12 – Achieving well-designed places). Paragraph 131 of the NPPF states that “*Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*”. In this regard, Policy D1 of the North Hertfordshire Local Plan are consistent with the objectives set out within the NPPF. In terms of impact on heritage assets within a Conservation Area, the Council has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of the Listed Building and Conservation Areas Act (1990). Furthermore, Section 16 of the NPPF sets out guidance relating to sustaining and enhancing heritage assets. In this regard, Policy HE1 of the Local Plan is consistent with the NPPF.

4.3.5 The Design and Heritage Statement states that ‘*In order to ensure the continued viability of the building and prevent the building deteriorating the applicants have decided to replace the existing roof finishes and, to improve the suitability of the building, introduce flush mounted photovoltaic panels whilst carrying out the re-roofing works.*’ In order to facilitate the proposed works, the development includes raising the existing roof ridge height of the high-level roof. The works would involve the installation of insulation between the existing rafters following the removal of the existing roof finishes. It is understood that the proposed insulation would complement the existing insulation already installed under the rafters. To allow for the proposed insulation, the works would require the ridge height of the existing high-level roof to be increased by approximately 21cm. In general terms, I raise no objection to the principle of an increase in the ridge height as this is considered to be of minimal impact and less than substantial harm at the medium to high end of that continuum if the existing detailing is to be recreated and therefore harmful to the character and appearance of the Conservation Area. As a result of the likely inability to replicate the existing detailing, I find the proposed alteration to increase the ridge height of the high-level building to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated.

4.3.6 In addition, the development would involve the removal of the existing slate roof covering and its replacement with a modern cement based imitation tile. No justification has been submitted to evidence the reason(s) as to why the existing slates could not be re-used with limited matching replacements where necessary. The existing slate roof covering is part of the historic fabric of the building and contributes highly, in my view, to the character and appearance of the Conservation Area. I therefore find the replacement roof tiles to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated.

4.3.7 The final aspect of the development would include the installation of a number of photovoltaic solar panels to the southeast facing roof slope of the high-level building. The panels are shown to be integrated within the proposed roof structure and would therefore display a flush external finish. Given the longer views of the roof slope from a southeast point in Market Hill and Fish Hill, I am of the view that the proposed panels would be highly visible from the public domain and would sit at the less than substantial medium to high end of the continuum. I therefore find the installation of the proposed panels to be inappropriate and unacceptable due to the fact that the harm would outweigh the public benefit. I therefore find the replacement roof tiles to be inappropriate and unacceptable and contrary to Policies D1 and HE1 of the Local Plan and Sections 12 and 16 of the NPPF for the reasons stated.

Impact on Neighbouring Properties:

- 4.3.8 A core planning principle set out in the NPPF is to always seek to secure a good standard of amenity for all existing and future occupants of land and buildings. This principle is reflected in the provisions of Policy D3 of the NHLP.
- 4.3.9 No objections have been received from neighbouring properties, and I am satisfied that any impact to existing residential amenity would not be increased as a result of the development and so complies with Policy D3 of the Local Plan and Section 12 of the NPPF.

Highways and Parking:

- 4.3.10 The development does not have any impact on highway safety or parking.

Archaeology

- 4.3.11 When considering the impact of proposed development on the significance of a designated heritage asset (such as archaeology), the NPPF (Section 16 – Conserving and enhancing the historic environment) notes that great weight should be given to the asset's conservation; the more important the asset, the greater the weight should be. In this regard, Policy HE4 of the Local Plan is consistent with the NPPF.
- 4.3.12 The proposed works are likely to have an impact on heritage assets of archaeological interest as a result of the interventions to the fabric of the building and is contrary to Policy HE4 of the Local Plan and Section 16 of the NPPF.

Biodiversity Net Gain

- 4.3.13 The proposed development is considered 'de minimis' and would not exceed the threshold of 25 sqm of on-site habitat, or and/less than 5 meters of linear habitats. This application is therefore exempt from BNG legislation defined under article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Environmental Implications:

- 4.3.14 Section 14 of the NPPF sets out how the planning system should support the transition to a low carbon future. The principles set out in Section 14 are reflected in Policy D1 of the North Herts Local Plan, which sets out that development proposal should take all reasonable opportunities to reduce energy consumption and waste, retain existing vegetation and propose new appropriate planting, and future proof for changes in technology and lifestyle.
- 4.3.14 The proposed installation of photovoltaic panels would make a positive contribution towards energy savings and the proposed insulation would be likely to improve the overall energy efficiency of the building, however, whilst the development may comply with the broad requirements of Section 14 of the NPPF, para 167 also requires development to accord with other planning policies and in particular Section 16 of the NPPF and Policy D1 of the Local Plan which, in my view, the proposal fails to do for the reasons evidenced.

4.4 Conclusion

- 4.4.1 The proposed development is considered unacceptable and fails to comply with Policies SP1, SP9, SP13, D1, D3, HE1 and HE4 of the NHLP 2011-2031 and Sections 2, 12, 14 and 16 of the NPPF 2024.

4.5 **Alternative Options**

4.5.1 N/A

4.6 **Pre-Commencement Conditions**

4.6.1 N/A

5.0 **Recommendation**

5.1 That planning permission be **REFUSED** for the following reasons:

1. The proposed increase in ridge height to the high-level roof and the resulting external finishing detail to the gable end elevations of the building, the loss of original slate tiles and replacement with unsympathetic cement fibre tiles and installation of photovoltaic panels, by reason of its design, would result in an unsympathetic alterations to the existing building resulting in a detrimental impact upon on the character and appearance of the building and the Royston Conservation Area. No public benefits would outweigh the harm identified to the heritage asset. The proposed development would fail to comply with Policies D1 and HE1 of the North Hertfordshire Local Plan 2011-2031 and Section's 12 and 16 of the NPPF 2024.

Proactive Statement:

Planning permission has been refused for this proposal for the clear reasons set out in this decision notice. The Council acted proactively through positive engagement with the applicant in an attempt to narrow down the reasons for refusal but fundamental objections could not be overcome. 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.

Signed  Sam Dicocco Determining Officer	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF
Date: 11 April 2025	

Appendix 4: Comments from the LPA's Senior Historic Environment Advisor

Vicki Wood
Development Control
North Hertfordshire District Council

Postal Point CHN 108
Hertfordshire County Council
County Hall, Pegs Lane
HERTFORD SG13 8DN

Contact Andy Instone
Tel [REDACTED]
My ref P01/22/2696-1
Your ref 24/02696/FP
historic.environment@hertfordshire.gov.uk

Date: 23 December 2024

Dear Vicki,

Re: Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent. | The Old School House 4 Market Hill Royston Hertfordshire SG8 9JL

ARCHAEOLOGICAL IMPLICATIONS

Thank you for consulting us on the above application.

A Design and Heritage Statement submitted with this planning application notes (page 1):

The Old School house comprises part of the Former Royston National School which was built in 1886 for the children of Church of England families of Royston and is classed, by North Hertfordshire District Council, as a Building of Local Historic Interest.

I therefore believe that the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:

- 1) The archaeological building recording of all interventions to the fabric of the building in areas where such works might reveal information relating to the development of the building, and for the purpose of recording any original historic features (etc.) that may be exposed;
- 2) The analysis of the results of the archaeological work with provision for the subsequent production of a report and an archive, and the publication of the results;
- 3) Such other provisions as may be necessary to protect the archaeological and historic interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further

believe that these recommendations closely follow the policies included within Policy 16 (para. 205, etc.) of the National Planning Policy Framework, and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case three appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

A No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme and methodology of site investigation and recording as required by the evaluation
3. The programme for post investigation assessment
4. Provision to be made for analysis of the site investigation and recording
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation
6. Provision to be made for archive deposition of the analysis and records of the site investigation
7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.

B The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition **(A)**

C The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition **(A)** and the provision made for analysis and publication where appropriate.

If planning consent is granted, I will be able to provide detailed advice concerning the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

I hope that you will be able to accommodate the above recommendations.

Please do not hesitate to contact me should you require any further information or clarification.

Yours sincerely,

Andy instone
Senior Historic Environment Advisor, Hertfordshire LEADS
Environmental Sustainability

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.