

PLANNING STATEMENT

ROYSTON LEISURE

CENTRE

Quality Assurance

Site name:	Royston Leisure Centre
Client name:	Willmott Dixon Construction Limited on behalf of North Hertfordshire District Council
Type of report:	Planning Statement
Prepared by:	Suzi Green MRTPI
Date	March 2025
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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Bidwells in support of a detailed planning application for decarbonisation works and a 2-storey front extension at Royston Leisure Centre (“the Site”).
- 1.2 Willmott Dixon Construction Limited on behalf of North Hertfordshire District Council are the applicant for the planning application (“the Applicant”).
- 1.3 North Hertfordshire District Council (“NHDC”) is the local planning authority with sole jurisdiction over the planning application.
- 1.4 The description of development is proposed as follows:
“Decarbonisation works, including: the provision of insulated rendering to external walls, air source heat pump and associated enclosure, photovoltaic panels on roofs, substation, and the erection of a 2-storey, front extension to the leisure centre and associated infrastructure and BNG.”

Background

- 1.5 Willmott Dixon Construction Limited have been instructed by North Hertfordshire District Council to undertake a programme of decarbonisation works to three leisure centres in Hertfordshire – Royston Leisure Centre, Hitchin Swimming Centre and North Herts Leisure Centre. These works reflect the Council’s commitment to reducing emissions and decarbonising their operations, with the ultimate goal of achieving a net-zero carbon emissions across their estate.

Purpose

- 1.6 The purpose of this Statement is to explain the development proposals and assess them against the Development Plan and other material considerations, including national planning policy, to demonstrate that planning permission should be granted without delay.
- 1.7 A suite of design and technical reports have been submitted in support of this planning application, in line with the Council’s local validation list. The submitted documents are outlined in the cover letter.
- 1.8 For ease, a brief summary of the findings of these reports is provided within **Section 5**.

2.0 The Site

The Site

- 2.1 Royston Leisure Centre is located to the north-east of Royston, Hertfordshire. The leisure centre offers a variety of health and fitness facilities, including: an indoor swimming pool, a sports hall, gym floor space and fitness studios.
- 2.2 Vehicular and pedestrian access routes are off Woodcock Road. There is a large main car park at the front of the site.
- 2.3 Royston Leisure Centre is owned by the NHDC and managed by Everyone Active.
- 2.4 Figure 1 below shows an aerial view of the Royston Leisure Centre (shown in red) and the surrounding area.



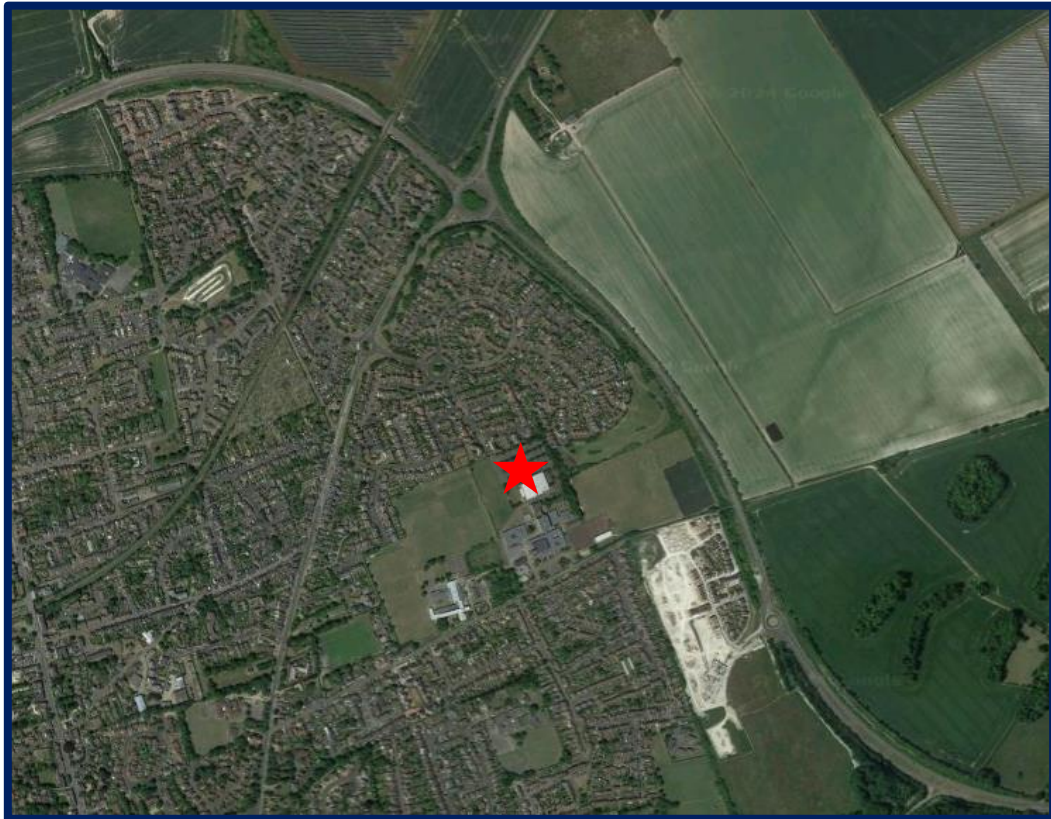


Figure 1: Aerial Images of the Site (Source: Google Maps)

Planning Status

- 2.5 Confirmation of planning use class status of the leisure centre was provided by Council Officers in May 2024.
- 2.6 The leisure centre was confirmed to fall under Use Class E(d) – Commercial, Business and Service (Indoor Sport, recreation or fitness (not involving a pool)).

Surrounding Context

- 2.7 To the north of the site is an existing residential area. To the east of the site there is a tree line on the other side of which are residential properties and a playground. King James Academy Royston is located to the south of the site. To the west of the site are playing fields.

Site Constraints

- 2.8 Royston Leisure Centre is not a listed building nor located in close proximity to a listed building. The building is not identified as a being of local interest. The site is not located within an identified Conservation Area.
- 2.9 The site is not located within a designated Green Belt.

- 2.10 The site is located within Flood Risk Zone 1, the lowest risk flood zone. There are areas vulnerable to surface water flooding which surround the building where there is existing hard standing.
- 2.11 The site is located on the outer edge of Site of Special Scientific Interest Impact Risk Zone. Otherwise, there are no notable environmental designations which effect the site e.g. AONB, Local Nature Reserve, etc.

Planning History

- 2.12 A review has been undertaken of the Council's online planning application records. Relevant planning history for the site is shown in the below table:

APPLICATION REFERENCE	DEVELOPMENT DESCRIPTION	DECISION	DECISION DATE
19/0177/FP	Single story side extension to provide additional storage	Conditional Permission	24 Jun 2019
04/00669/1	Approval of details of sports and leisure centre with associated car and coach parking, landscaping, formation of vehicular and pedestrian access and ancillary works (as amended by plans received 18th May 2004)	Conditional Approval of Details	02 Jun 2004

3.0 Proposed Development

The Proposals

- 3.1 The proposed development is a detailed application for decarbonisation works and a 2-storey, front extension to Royston Leisure Centre.
- 3.2 The application specifically seeks planning permission for the following decarbonisation works: PV panels on the roofs, the provision of external insulated rendering, and for an Air Source Heat Pump and associated enclosure. A substation is also proposed to meet electricity requirements.
- 3.3 The application further seeks approval for a 2-storey extension which is located on the front elevation of the building. This extension will create 300m² of new floorspace for the leisure centre, on the ground floor offering a multi-purpose studio space and the first floor offering additional gym floorspace.
- 3.4 In order to facilitate the extension, a number of existing sheffield cycle stands are to be removed. As a result, a new cycle parking area is going to be created to the side of the building, re-providing existing spaces and supplemented with an additional 14 cycle parking spaces (7 stands) to account for the additional floor space to be created. A new secure staff cycle parking area is proposed to the rear of the leisure centre.
- 3.5 The proposal also includes the provision of additional landscaping and will deliver a biodiversity net gain (BNG) in compliance with legal requirements.
- 3.6 For completeness, it is to be noted that the proposed works as set out above form part of a wider set of decarbonisation works being undertaken at Royston Leisure Centre. The additional works being undertaken are set out below and included on the provided plans; this has been done for transparency purposes and because they feed into the wider sustainability benefits (which the submitted Energy Statement captures). However, it is emphasised that these works are not subject to consideration as part of the application.
- Internal changes (do not require planning permission)
 - Thermostatic Radiator Valves and zonal controls for heating
 - Storing the rejected heat from the Combined Heat and Power
 - Passive Infrared Sensor in office areas
 - Replace existing heat emitters for low temperature hot water Air Source Heat Pump
 - De minimis works (as confirmed with Case Officer as part of pre-application process, but included on plans for completeness)
 - Replace existing insulated panels for like for like higher performing panels
 - Insulate the roof from above and install new roof membrane.
- 3.7 It is also noted that whilst the photo voltaic panels on the roof have been included as part of this planning application, these panels qualify as permitted development subject to securing prior notification. On this basis, the scope of impacts considered in relation to these works should be restricted to that which are required to be evidenced as part of the prior notification process.

4.0 Consultation and Stakeholder Engagement

Pre-Application Discussions

- 4.1 A pre-application submission was made to North Hertfordshire District Council in October 2024. This submission set out the proposed works at the site and asked for a view on whether elements were considered to fall under permitted development rights, the design and policy compliance.
- 4.2 A site visit was undertaken with the Case Officer on Wednesday 30th October.
- 4.3 A written response (LPA ref: 24/02243/PRE) was received from the Case Officer on 11th November 2024.
- 4.4 This response set out the following comments:
- Confirmed relevant Local Plan Policies and material considerations.
 - Confirmed where potential works were considered to be internal works or de minimis in nature, and therefore not requiring planning permission. Requested that this information be included as part of the planning submission for completeness.
 - Confirmed that PV provision on the roofs and Air Source Heat Pumps (subject to meeting size requirements) would qualify as permitted development subject to prior notification, but requested that they be included as part of the planning application for completeness.
 - Requested landscape screening for Air Source Heat Pumps.
 - Requested details on colours proposed and samples of external rendering as part of application (as opposed to via planning condition).
 - Confirmed that if the red line boundary contained a vegetated area greater than 25sqm it would trigger 10% BNG.
 - Noted the requirement for an Energy Assessment.
 - Noted the requirement for a Noise Assessment related to the Air Source Heat Pump.
 - Noted that the proposed development is unlikely to have a negative impact on nearby residential dwellings given the existing distances from the host building.
 - The proposed extension is functional in appearance and would match the existing in form and materials
 - Advised that the proposed windows on the first floor side elevation be obscure glazed to reduce the impact of overlooking towards the school site.
 - Noted that justification would need to be provided for any divergence from the standards set out in NHDC's Parking SPD.
 - In principle a new substation is acceptable, but noted details are needed and that this would require screening given it's location next to the car park.

5.0 Summary of Technical Assessments

5.1 Before an analysis of the relevant planning policies and an assessment of the proposal against the planning framework, the below section provides a short synopsis of the findings of the technical assessments that have been prepared to accompany the planning application.

5.2 Highways and Parking

5.3 A Transport Statement has been prepared by Rappor to support this application.

5.4 The Transport Statement sets out that the site is sustainably located, with accessibility to a wide range of local services and amenities to promote linked trips, supported by local public transport services. There is also a significant local population within walking and cycling distance of the site.

5.5 The report notes that no changes are proposed to the existing access and that the access is currently operating without any issues and is considered safe and suitable to serve all users of the future development.

5.6 The Transport Statement has assessed the net trip impact and indicates that the development will result in only a minor increase in vehicle trips at the site such that there will be no adverse impact on the local road network.

5.7 The results of a parking accumulation assessment demonstrate that the existing car parking provision is suitable to serve the development and will not result in any operational issues within the car park or overspill onto the adjacent highway/residential area.

5.8 To accommodate the proposed extension, the existing short stay cycle parking provision will be relocated to the west of the building and an additional 14 short stay cycle parking spaces will be provided meeting NHDC parking standards. The application proposes a covered and secure cycle shelter with 10 long stay cycle parking spaces for staff and this represents a benefit associated with the proposed development, with it noted that there is currently no cycle parking provision for staff.

5.9 The statement concludes that the development will have no adverse impact on the operation of the local highway network, the existing car parking is suitable to serve the proposed development and adequate cycle parking will be provided. The proposals are acceptable in highway and transportation terms, and there are no reasons that should prevent approval of the planning application.

Environmental Noise Assessment

5.10 An Environmental Noise Assessment has been prepared by Mach Group as part of this application.

- 5.11 This report sets out the assessment work that has been undertaken at the site to assess the potential noise impacts of the proposed development, with regard to the existing noise climate established through survey work.
- 5.12 The Assessment confirms that the proposed plant and associated attenuation will have a low impact upon the nearest sensitive receptors and is therefore considered to be a Lowest Observed Adverse Effect Level.

Tree Survey and Arboricultural Impact Assessment

- 5.13 A Tree Survey has been undertaken by RPS and provided as part of the planning application pack, and a subsequent Arboricultural Impact Assessment undertaken to consider the potential impacts of the proposed development.
- 5.14 It is identified that 3 trees will require removal in order to facilitate the proposed layout – these are Category A, B and C trees.
- 5.15 The AIA notes that the majority of individual trees on site are to be retained and that the tree loss is minimal and deemed acceptable in order to facilitate construction. The new tree planting proposed as part of the scheme is also considered to mitigate the loss of the trees proposed for removal.

Ecology Assessment, Preliminary Roost Assessment and Biodiversity Net Gain

- 5.16 A Preliminary Ecological Assessment and a subsequent Preliminary Roost Assessment, as well as a BNG Assessment have been prepared by RPS in relation to proposals.
- 5.17 The PEA confirms that no designated sites are expected to be negatively impacted by the proposal. The PEA notes that the works are unlikely to affect reptiles, amphibians and mammals. Mitigation is recommended in relation to commuting/foraging bats, badgers and nesting birds.
- 5.18 The PEA identified that the site offers potential roosting habitat for bats within the buildings on site and recommended a Preliminary Bat Roost Assessment, which has been undertaken. This Assessment identified the need for emergence surveys and mitigation.
- 5.19 A proposed Landscaping Plan and subsequent BNG assessment have been prepared in relation to the proposed development.
- 5.20 The pre-development score for the site was calculated to be 0.51 habitat units.
- 5.21 The BNG subsequently confirms that the proposals will deliver a biodiversity net gain on-site which complies with legal requirements, specifically a 10.32% net gain.

Energy Statement

- 5.22 An Energy Statement has been prepared by QODA.

- 5.23 This Energy Statement considers all the works being undertaken at Royston Leisure Centre in relation to the decarbonisation works, irrespective of whether they form part of the scope of this planning application. This is on the basis that the majority of changes are inter-related and collectively deliver the sustainability enhancements being achieved on site. This approach was agreed with the Case Officer as part of pre-application discussions.
- 5.24 The Energy Statement confirms that carbon reductions have been achieved through the decarbonisation works, with upgrades to more efficient services and low-zero technologies, as well as fabric insulation improvements where feasible.
- 5.25 In terms of the proposed extension, an energy hierarchy has been followed to ensure passive measures are at the centre of design, with efficient services and low-zero technologies supporting further reduction. It is though noted that opportunities to maximise passive measures were though limited by virtue of the nature of the proposals being in relation to an existing building with minor extension and because of the nature of the energy demands associated with leisure centres.
- 5.26 With reference to the Council's Sustainability SPD, the proposed is considered to achieve a silver ranking against the categories 'Optimizing passive design & fabric performance' and 'Achieving low carbon energy'.

Construction Traffic Management Plan

- 5.27 A Construction Traffic Management Plan has been prepared by Willmott Dixon Construction Limited to support this application.
- 5.28 This document sets out how the contractor will seek to mitigate the impacts of the construction process, including the key contacts, security arrangements, site welfare, delivery arrangements, etc.

6.0 Development Plan

Introduction

- 6.1 The purpose of this section is to provide an assessment of the proposal against relevant Development Plan policies alongside other material considerations.
- 6.2 Section 70(2) of the Town and Country Planning Act (1990), as amended by section 143 of the Localism Act 2011 states that:

“In dealing with such an application the authority shall have regard to:

- a) the provisions of the development plan, so far as material to the application;*
- b) any local finance considerations, so far as material to the application; and*
- c) any other material considerations.”*

- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act ('PCPA'), 2004 states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”*
- 6.4 An assessment of the proposal with respect to both the Development Plan and the other material considerations is provided below.

The Development Plan

- 6.5 The adopted Development Plan of relevance for NHDC comprises:
- North Hertfordshire Local Plan 2011 – 2031 (adopted November 2022).
- 6.6 There is no made Neighbourhood Plan that covers the site nor does the site fall inside a designated area.

Local Plan 2011 – 2031

- 6.7 The North Hertfordshire Local Plan 2011 – 2031 was adopted in November 2022.
- 6.8 The following policies are of relevance to the application:
- Policy SP1: Sustainable development in North Hertfordshire
 - Policy SP2: Settlement Hierarchy
 - Policy SP3: Employment
 - Policy SP6: Sustainable transport
 - Policy SP9: Design and Sustainability
 - Policy SP10: Healthy Communities
 - Policy SP11: Natural resources and sustainability
 - Policy T1: Assessment of transport matters
 - Policy T2: Parking
 - Policy D1: Sustainable design
 - Policy D3: Protecting Living Conditions

- Policy HC1: Community facilities
- Policy NE2: Landscape
- Policy NE4: Biodiversity and geological sites
- Policy NE12: Renewable and low carbon energy development

Material Considerations

- 6.9 In addition to the development plan policies, there are other material considerations that should be taken into account during the application process. These include:
- National Planning Policy Framework (NPPF) – Updated December 2024
 - National Planning Policy Guidance (PPG) – March 2014 (as updated)
 - National Design Guide – January 2021
 - Climate Change Act 2008 (2050 Target Amendment) Order 2019
 - National Policy Statements EN1 and EN3 - January 2024
 - National Net Zero Strategy: Build Back Greener– October 2021 (as updated April 2022)
 - North Hertfordshire District Council Climate Emergency Declaration - May 2019
 - North Hertfordshire District Council Climate Change Strategy 2022-2027
 - North Hertfordshire District Council Plan 2024 – 2028
 - Supplementary Planning Documents

National Planning Policy Framework

- 6.10 The National Planning Policy Framework (NPPF) is a relevant material consideration under Section 70 (2) of the Town and Country Planning Act 1990 (as amended) and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 (as amended). The NPPF promotes sustainable development in planning and positive growth.
- 6.11 The NPPF (2024) states that the “*purpose of the planning system is to contribute to the achievement of sustainable development*”.
- 6.12 **Paragraph 7** states “*the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.*”
- 6.13 **Paragraph 8** outlines 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.*” The three objectives are an economic objective, a social objective and an environmental objective.
- 6.14 **Paragraph 11** explains that “*plans and decisions should apply a presumption in favour of sustainable development. [plan-making text omitted in the interests of brevity]. 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 (footnote 8), granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (footnote 7); 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 (footnote 9)."*

6.15 The NPPF has a large number of intentions and aspirations that are relevant to the proposed development, however, the paragraphs that are of most relevance are described below:

- **Paragraph 39** explains that the LPA should approach decisions in a positive and creative way. Additionally, it outlines that applicants should look to secure developments that will improve the economic, social and environmental conditions of the area.
- **Section 8** relates to the promotion of healthy and safe communities.
- **Paragraph 96** outlines that planning decisions should aim to achieve places that are healthy, inclusive and safe places - which promote social interaction, are safe and accessible and that enable and support healthy lifestyles.
- **Paragraph 98a** articulates that planning decisions should plan positively for the provision and use of shared spaces, community facilities and other local facilities to enhance the sustainability of communities and residential environments.
- **Paragraph 98d** further adds that decisions should ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community;
- **Paragraph 103** states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.
- **Section 9** promotes sustainable transport methods, with safe and attractive walking and cycling routes being a significant element.
- **Paragraph 116** specifically outlines that developments should only be refused on highways grounds if there would be an *"unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- **Paragraph 131** affirms that *"the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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. Being clear about design expectations, and how these will be tested, is essential for achieving this."*
- **Paragraph 162** affirms that a proactive approach should be taken to the mitigating and adapting to climate change with planning policies supporting appropriate measures to ensure the future resilience of communities and its infrastructure.

- **Paragraph 164b** notes that new development can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- **Paragraph 165** notes that new development can help to increase the use and supply of renewable and low carbon energy and heat.
- **Paragraph 1676** states that in determining planning applications, local planning authorities should give **significant weight** to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights)...(emphasis added).
- **Paragraph 187** describes that both policies and decisions should contribute to and enhance the natural environment. It is outlined that this can be undertaken in a number of ways including minimising the impacts on and providing net gains for biodiversity.

National Planning Practice Guidance

- 6.16 The National Planning Practice Guidance was initially prepared in 2014 to support the NPPF with this being an online resource. This document is regularly updated.
- 6.17 Where energy efficiency improvements require planning permission local planning authorities should ensure any advice to developers is co-ordinated to ensure consistency between energy, design and heritage matters. **(Climate Change PPG, Paragraph: 008 Reference ID: 6-008-20140306).**
- 6.18 Net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand. Net gain is an umbrella term for both biodiversity net gain and wider environmental net gain. Biodiversity net gain is a requirement which was introduced in the Town and Country Planning Act 1990 by the Environment Act 2021. Where it applies developers must demonstrate how a development will deliver at least a 10% increase in biodiversity. It may help local authorities to meet their duty to conserve and enhance biodiversity under section 40 of the Natural Environment and Rural Communities Act 2006.” **(Natural Environment PPG, Paragraph: 020 Reference ID: 8-020-20240214).**
- 6.19 **Design PPG Paragraph: 001 Reference ID: 26-001-20191001** states that good design is set out in the National Design Guide under the following characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.
- 6.20 A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing **(Health and Wellbeing PPG, Paragraph: 003 Reference ID:53-003-20191101).**

National Design Guide

- 6.21 **Paragraph 3** notes that the “*National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This National Design Guide, and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are beautiful, healthy, greener,*

enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools."

- 6.22 *"In a well-designed place, an integrated design process brings the ten characteristics together in a mutually supporting way. They interact to create an overall character of place. Good design considers how a development proposal can make a contribution towards all of them. This applies to proposals of all sizes" (Paragraph 13).*
- 6.23 The 10 characteristics of a well-designed place are outlined in the below diagram (**Figure 6**), with these being discussed in detail within the guide. These characteristics are based on the objectives of Section 12 of the NPPF (Achieving well-designed places).



Figure 1: Extract from National Design Guide (Page 8)

Environment Act 2021

- 6.24 The Environment Act, which is intended to protect and enhance our environment for future generations, was passed into law on 10th November 2021. The Environment Act introduced the mandatory requirement for developments to show a 10% net gain in biodiversity. The act is now fully in force following earlier transitional arrangements.

Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 6.25 In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

National Policy Statements

- 6.26 Overarching National Planning Policy Statement for Energy EN1 and National Planning Policy Statement EN3 'Renewable Energy' were enacted in January 2024 and are material considerations. Whilst these are typically associated with Nationally Significant Infrastructure Projects, they are of relevance to small scale developments determined at the local level.
- 6.27 Overarching National Planning Policy Statement for Energy EN1 sets out the objective of ensuring that the supply of energy remains secure, reliable, affordable, and consistent with meeting the national target to cut Green House Gass emissions to net zero by 2050. In doing so it states *"Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains". (emphasis added)*
- 6.28 National Planning Policy Statement EN3 'Renewable Energy' notably states:
- *"Electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6)..."*
 - *"In the Net Zero Strategy, published in October 2021, government committed to action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60% increase in demand."*

Net Zero Strategy: Build Back Greener

- 6.29 The Net Zero Strategy, published in October 2021, sets out a long-term plan for the economy-wide transition to net zero that will take place over the next three decades.
- 6.30 This strategy notes the role that the planning system can play in supporting efforts to combat climate change and bring greenhouse gas emissions to net zero by 2050.
- 6.31 The strategy further notes that aim to reduce direct emissions from public sector buildings by 75% by 2037 compared to 2017.

North Hertfordshire District Council Climate Emergency Declaration

- 6.32 On 21 May 2019, NHDC passed a climate emergency motion.

- 6.33 This declaration asserted the council's commitment toward climate action beyond current government targets and international agreements.

North Hertfordshire District Council Climate Change Strategy 2022-2027 (inc. Appendix A and B)

- 6.34 The Council's Climate Change Strategy was reviewed in 2022.
- 6.35 This strategy has an action plan which has three priorities: 'Taking Action', 'Enabling Carbon Savings' and 'Inspiring the Community'.
- 6.36 The key objectives outlined within the Climate Change Strategy are:
- Achieve Carbon Neutrality for the Council's own operations by 2030
 - Ensure all operations and services are resilient to the impacts of climate change
 - Achieve a Net Zero Carbon district by 2040
 - Become a district that is resilient to unavoidable impacts of climate change
- 6.37 Notably, 'Taking Action' focuses on reducing the Council's own carbon emissions on its own buildings and property through:
- *'Ensure that new system installations are renewable electricity rather than gas-fired, where this is deemed the best option after thorough consideration'*
 - *'Consider replacing gas with electricity from renewable sources where appropriate'*
 - *'Ensure no new buildings use gas-fired systems'*
 - *'Explore use of heat pumps (ground source or air source) to provide heating as the technology develops'*
 - *'Continue to identify ways to improve building energy management systems to reduce waste'*
 - *'Improve building insulation and conduct lighting surveys to reduce energy outputs'*
 - *'Explore and progress on-site generation of electricity from solar or wind'*
 - *'Explore opportunities for the sustainable heating of swimming pools'd'*

North Hertfordshire District Council Plan 2024 – 2028

- 6.38 The Council Plan 2024 – 2028 sets out NHDC's priorities for the coming period, one of which is supporting and delivering sustainability.
- 6.39 On sustainability, that Council states: *"We have also declared a climate emergency and an ecological emergency, and set goals to become net zero, to show we understand the seriousness of these crises, the impact on our district, and that we will do what we can to act on these issues"*

- 6.40 It is further added that *“We will work with you to achieve balanced budgets, improve environmental sustainability, and reduce carbon emissions as much as we can to work towards our net zero ambitions.”*

Supplementary Planning Documents

- 6.41 The following documents form part of the general guidance and advice provided by the Council to inform proposals:
- 6.42 The following documents form part of the general guidance and advice provided by the Council:
- Sustainability Statement (adopted September 2024)
 - Design Supplementary Planning Document (adopted July 2011)
 - Vehicle Parking at New Developments (adopted November 2011)

7.0 Planning Assessment

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 identifies that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Having identified and reviewed the relevant planning policy and national guidance, the main material planning considerations of the application are considered in turn, below.

Principle of Development

- 7.2 The principle of development for the proposal is underpinned by a range of policies.
- 7.3 'Policy SP2' identifies Royston as a 'town'. 'Policy SP1: Sustainable development in North Hertfordshire' states that planning permissions should be granted for proposals that *'create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices'*, as well as *'secure any necessary mitigation measures that reduce the impact of development, including on climate change'*.
- 7.4 'Policy SP3: Employment' states that the Council will seek to *'support new and existing businesses'* and 'Policy HC1: Community facilities' supports the provision of new community facilities. It is also noted that relevant policies in relation to health (SP10) and environment (NE12, D1) (as discussed in more detail below) are relevant in that they support improvements to existing provision.
- 7.5 The proposal includes works to the existing leisure centre, located within the settlement boundary of a main town in North Hertfordshire, which will secure environmental improvements to the building, reducing its carbon impact (discussed in more detail below). This is supported under Policies SP1, SP2, NE12 and D1. It is further noted that the proposed photovoltaic panels qualify as permitted development subject to prior notification and this establishes the general principle of photovoltaic panels on the roof as appropriate.
- 7.6 The principle of the decarbonisation works are also supported at a National level through legislation, National Policy Statements and the Net Zero Strategy. Notably the NPPF states *'in determining planning applications, local planning authorities should give **significant weight** to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).'* At a Local level, proposals are supported as part of the Council's Climate Emergency declaration, Climate Change Strategy 2022-2027 and Council Plan 2024 – 2028. These documents are material planning considerations in the decision-making process.
- 7.7 Royston Leisure Centre also falls under an employment use (as discussed at 2.5/2.6) - the proposed extension will enable the business to expand and the works in their totality will help to support the ongoing viability of operations (e.g. reducing operational running costs for heating) in accordance with relevant policy.
- 7.8 At the same time, the leisure centre has a community function for which the expansion will increase the capacity of the facility so that it can be enjoyed by more people and will see the

introduction of a new studio space which will increase opportunities for social interaction through classes. The proposed extension will support health outcomes through the provision of additional gym and studio floorspace increasing opportunities for exercise and ensuring demand for such facilities in this area is met. The decarbonisation works will also help to support the long-term future of this building, protecting its existing contribution as community facility.

- 7.9 The principle of development is therefore supported across a range of Local Plan policies and by material considerations in the planning process.

Sustainability and Climate Change

- 7.10 Whilst the principle of development is supported in planning terms (by virtue of the nature of the proposals being intended to result in sustainability improvements to Royston Leisure Centre), it is important to consider sustainability policies in their own right in terms of the compliance of proposals with measures.
- 7.11 As noted above 'Policy SP1: Sustainable development in North Hertfordshire' supports development that will *'secure any necessary mitigation measures that reduce the impact of development, including on climate change'*.
- 7.12 'Policy NE12: Renewable and low carbon energy development' and 'Policy SP11: Natural resources and sustainability' broadly support the provision of renewable and low carbon energy development in appropriate locations.
- 7.13 'Policy D1: Sustainable design' further seeks to ensure that development proposals *'reduce energy consumption and waste'*. Specific requirements/provisions are subsequently set out in the Sustainability SPD.
- 7.14 This proposal includes works which are specifically targeted at improving the environmental impact Royston Leisure Centre. Solar panels are proposed and due consideration has been given to their location in order to minimise their visual impact.
- 7.15 As discussed in detail in Section 5, an Energy Statement has been submitted as part of this application which evidences the significant improvements that will result from all the works collectively being undertaken at Royston and outlines how the proposals address requirements set out in the Sustainability SPD, with the proposal meeting silver standard against key areas identified. It is noted that not all of the provisions in the Sustainability Statement are relevant to this application, by virtue of the nature and/or scale of the proposed works, and therefore not all guidance has been addressed in the submitted Energy Statement.
- 7.15.1 The proposal complies with Local Plan policies related to sustainability and climate change.
- 7.16 As noted previously, the principle of the decarbonisation works are also supported at a National level through legislation, the NPPF, National Policy Statements and the Net Zero Strategy and at a Local level as part of the Council's Climate Emergency declaration, Climate Change Strategy 2022-2027 and Council Plan 2024 – 2028; these are material planning considerations in the decision-making process.

Health

- 7.17 'Policy SP10: Healthy Communities' seeks to ensure that healthy, inclusive communities are maintained and created, with the policy notably adding that the Council will seek to *'protect, enhance and create new physical and green infrastructure to foster healthy lifestyles'*.
- 7.18 The decarbonisation works constitute enhancements to the building and these will help to support the ongoing operation of this leisure centre, reducing operational costs and the long-term suitability of the building for its purpose; this will ensure that it can continue to act as a facility which supports and improves health outcomes in line with the aspirations of this policy.
- 7.19 The proposal also includes an extension to the existing leisure centre which is intended to improve this facility and increase its leisure offering as a result of the demand for services (in turn supporting health outcomes); this proposal can therefore be considered to qualify as the provision of new physical infrastructure under Policy SP10.
- 7.20 The proposal is supported by the provisions of Policy SP10.

Architecture and Urban Design

- 7.21 'Policy D1: Sustainable design' seeks to ensure that high-quality proposals come forward in the district. This policy notably requires that development proposals respond positively to the site's local context, create/enhance public realm, and retain and propose appropriate new planting. 'Policy SP9: Design and Sustainability' further outlines key considerations in relation to securing good design. It states that the Council will *'support new development where it is well designed and located and responds positively to its local context'*.
- 7.22 The proposed development has sought to respond to its setting and is of a high design standard. The proposed extension has been designed to be sympathetic to the existing building in terms of its scale, massing and appearance.
- 7.23 Changes to the surrounding public realm have been carefully considered, including its visibility and security, and new hard/soft landscaping is proposed, including screening in relation to the proposed ASHP and substation in order to minimise their visual impact.
- 7.24 The proposed rendering has been designed and located so as to be sympathetic to the existing building in terms of its scale, massing and appearance. The solar panels on the roof have been located to be as visually un-obtrusive as possible.
- 7.25 The Council's views have been sought on the design of the proposals and material choices as part of the pre-application process.
- 7.26 Please see the submitted Design and Access Statement for more information on the evolution of design on this site.
- 7.27 The proposal meets relevant policy requirements in relation to design.

Highways and Parking

- 7.28 'Policy T1: Assessment of transport matters' requires that development proposals assess their impact on the highways network. 'Policy SP6: Sustainable transport' further requires proposals to promote the use of sustainable transport modes insofar as reasonable and practicable.
- 7.29 A Transport Statement has been prepared by Rappor and submitted as part of this application (see Section 6 for a detailed summary). This work has confirmed that the development proposals are acceptable in highway and transportation terms, and there are no reasons that should prevent approval of the planning application.
- 7.30 'Policy T2: Parking' seeks to secure appropriate parking provision on sites. No additional car parking is proposed on site. The site is located in a sustainable location the heart of Royston and the use of sustainable modes of transport to travel to this site should be encouraged. It is also noted that parking surveys have been undertaken which confirm that there is existing parking capacity to justify this approach and it is noted that there is limited land available on site to deliver additional car parking spaces in any case. The proposal includes the relocation of 30 existing cycle parking stands (equivalent to 60 spaces) to a new location, in addition to the provision of 12 new cycle parking spaces in line with the Council's requirements for the additional floor space being proposed. The proposal further includes a new long-term, staff cycle parking area for 10 cycles as an enhancement to the sustainable transport provision on site.
- 7.31 The proposal is considered to broadly comply with relevant Local Plan policies on Highways and Parking.

Landscape

- 7.32 'Policy NE2: Landscape' seeks to ensure that development responds to its landscape context, protecting and enhancing it as necessary.
- 7.33 The proposed extension has resulted in the loss of a small area of hardstanding containing cycle stands and some limited, low value landscaping (including a shrub). In response, the proposal has sought to introduce enhancements to the general landscaping to the immediate area to the west of the building. This includes levelling the ground so that this space is useable and re-introducing hard and soft landscaping, including extensive tree planting, as well as the inclusion of replacement cycle parking. This area is located adjacent to an existing outdoor gym area and will improve activation of this area making it feel more overlooked and safer for users.
- 7.34 3no trees are proposed to be removed as part of the proposals. One high quality tree will be lost to facilitate the substation - the choice of this location is linked to the existing routing of underground cables. A further moderate quality tree will be lost as a result of the ASHP, for which there were limited location options that could be considered for its placement. The loss of trees on site has been avoided where possible and is limited in nature, and the loss of the existing trees should be considered in the context of the significant long-term, environmental benefits associated with the development. The proposal also includes the provision of landscape screening in relation to the substation and ASHP enclosure so as to reduce its visual impact.

- 7.35 The new landscaping is proposed on site forms part of the BNG strategy which will secure a net gain on site of 10.32% in compliance with legal requirements.
- 7.36 The proposed landscaping is broadly in accordance with relevant policy.

Ecology

- 7.37 'Policy NE4: Biodiversity and geological sites' seeks to protect, enhance and manage biodiversity as part of the planning process, as well as secure biodiversity net gain on sites.
- 7.38 A Preliminary Ecological Appraisal (PEA) prepared by RPS and a Tree Survey prepared by RPS have been submitted as part of the application, in addition to a Biodiversity Net Gain (BNG) Assessment.
- 7.39 Ecology surveys have been undertaken in relation to the site, with the development confirmed not to impact on a number of species and mitigation proposed as necessary.
- 7.40 It is further confirmed that the development will meet the requirement for 10% BNG in accordance with legislative requirements and in line with Policy NE4.
- 7.41 It is noted that bat emergence surveys will need to be carried out May – August prior to development commencing with subsequent mitigation put in place as necessary, and that these undertakings are secured through legal processes separate to the planning system i.e. bat license from the Environment Agency. The proposed photovoltaic panels fall under permitted development subject to prior notification and on the basis that ecology is not a consideration as part of the prior notification process and this represents a fall back position, ecology should not be treated as within the scope of factors considered as part of this application on these works. Similarly, the proposed ASHP enclosure is unlikely to affect any identified prospective roosts.
- 7.42 Appropriate conditions can secure relevant provisions in relation to ecology to ensure compliance with policy.

Amenity

- 7.42.1 'Policy D3: Protecting Living Conditions' seeks to ensure that the amenity of existing residents is protected from unacceptable harm resultant from development proposals, with development proposals required to mitigate their impacts where needed.
- 7.42.2 This planning application is supported by a Noise Assessment prepared by Mach. This has been produced as a result of the perceived noise implications of the proposed ASHP. This report confirms that the proposed development will have a low impact upon the nearest sensitive receptors and is therefore considered to be a Lowest Observed Adverse Effect Level.
- 7.42.3 The proposal is in compliance with Policy D3.

8.0 Conclusion

- 8.1 This Planning Statement has been prepared in support of a full planning application for decarbonisation works and an extension to Royston Leisure Centre.
- 8.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that proposals are to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.3 The proposed development will see an extension added to the existing leisure centre, increasing the available gym floorspace and creating a new studio space. This extension will support ongoing business operations, has the potential to contribute towards positive health outcomes and will help to ensure the continued use of the leisure centre by the local community – all of which are supported under Local Plan policy.
- 8.4 The general principle of the decarbonisation works is supported under local policy by virtue of the environmental improvements that will be delivered and the NPPF gives significant weight to these benefits in the planning balance. The proposed solar panels also qualify as permitted development (prior notification required) further supporting the principle of this element of the works.
- 8.5 The proposed development has addressed key considerations in relation to design, ecology, landscape, highways and parking, and amenity.
- 8.6 The proposal is in broad accordance with the adopted Local Plan.
- 8.7 The principle of the decarbonisation works is also supported at a National level through legislation, the NPPF, National Policy Statements and the Net Zero Strategy and at a Local level as part of the Council's Climate Emergency declaration, Climate Change Strategy 2022-2027 and Council Plan 2024 – 2028; these are material planning considerations in the decision-making process.
- 8.8 It is further noted that the proposed development will satisfy the three elements of sustainable development: economic; social and environmental, as set out in the NPPF.
- 8.9 In view of the above, the proposal should be granted planning permission forthwith.

