

PLANNING STATEMENT NORTH HERTS LEISURE CENTRE

Quality Assurance

Site name:	North Herts Leisure Centre
Client name:	Willmott Dixon Construction Limited on behalf of North Hertfordshire District Council
Type of report:	Planning Statement
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Date	March 2025
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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Bidwells LLP in support of a detailed planning application for decarbonisation works at North Herts Leisure Centre, Letchworth ("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, a substation, and photovoltaic panels on roofs."

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 North Herts Leisure Centre is located on the east of the settlement of Letchworth. The leisure centre offers a variety of health and fitness facilities, including: an indoor swimming pool and associated learner pool, gym floor space, a sports hall, a dance studio, squash courts, soft play area and café.
- 2.2 Vehicular and pedestrian access routes are off Baldock Road (B656). There is a large, main car park at the rear of the site.
- 2.3 North Herts Leisure Centre is owned by the Letchworth Heritage Foundation and leased to NHDC. The leisure centre is managed by Everyone Active.
- 2.4 Figure 1 below shows an aerial view of the North Herts Leisure Centre (shown in red) and the surrounding area.



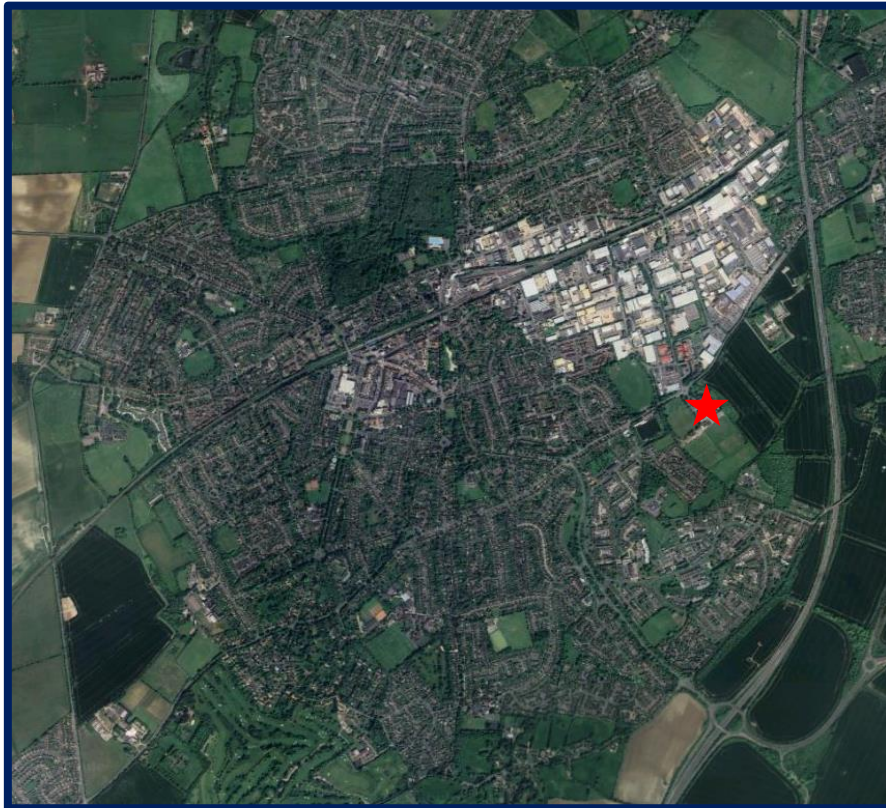


Figure 1: Aerial Images of the Site (Source: Google Maps)

Planning Status

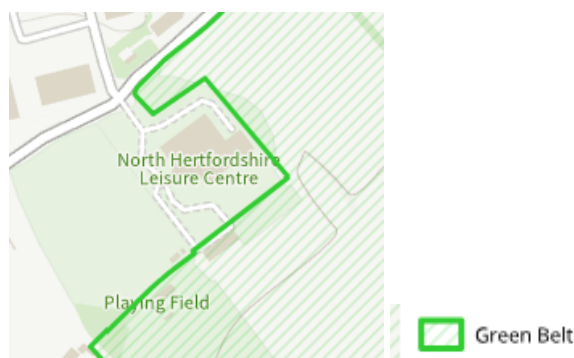
- 2.5 Confirmation of planning use class status of the leisure centre was provided by Council Officers in May 2024.
- 2.6 The leisure centre was confirmed to fall under Use Class E(d) – Commercial, Business and Service (Indoor Sport, recreation or fitness (not involving a pool)).

Surrounding Context

- 2.7 To the north-east of the site, on the other side of a strong tree boundary, are agricultural fields.
- 2.8 The site is bound by Letchworth Garden City Rugby club and its associated car parking, pavilion and pitches to the south-east.
- 2.9 Letchworth Eagles Football Club and its associated car parking, pavilion and pitches are located to the south-west.
- 2.10 To the north-west is the B656 on the other side of which is an existing commercial area.

Site Constraints

- 2.11 North Herts 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.
- 2.12 The site is not located within a designated Green Belt. It is noted that the boundary does come up close to the leisure centre.



Extract of NHDC's Online Mapping Showing Green Belt in relation to the Site

- 2.13 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, however it is noted that these are unlikely to be affected by development proposals.
- 2.14 There are no notable environmental designations which effect the site e.g. AONB, Local Nature Reserve, Site of Special Scientific Interest, etc.

Planning History

- 2.15 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
86/01697/1	Erection of extension to pool for water slides.	Conditional Permission	13 Nov 1986
81/01714/1AD	Internally illuminated three sided sign mounted on brick panels.	Consent	03 Dec 1981
93/00036/1A	Two replacement illuminated panels in existing free standing sign and replacement illuminated entrance sign on building	Consent	25 Feb 1993
03/01754/1	Replacement of existing glazing with translucent panelled cladding	Conditional Permission	16 Feb 2004
15/01594/1	Single storey front extension to existing building to provide a Learner / Training Pool with cafe area, terrace and associated two storey plant room; 15 additional car	Conditional Permission	18 Sep 2015

	parking spaces, addition of external lighting to revised car park layout and ancillary works.		
22/03019/FP	Change of use of existing squash courts 1 and 2 on first floor to a soft play area and existing squash courts 1 and 2 and the studio on ground floor to soft play area, changing entrance to soft play area with associated toilets and refreshment area to replace existing staff room and changing areas, installation of first floor window and canopy to south east elevation and the construction of a new public entrance.	Conditional Permission	11 Jan 2023
24/01965/AD	Installation of roadside sign, replace existing banner frame and level ground area following demolition of existing brick sign structure.	Conditional Consent	07 Nov 2024

3.0 Proposed Development

The Proposals

- 3.1 The proposed development is a detailed application for decarbonisation works at North Herts Leisure Centre.
- 3.2 The application specifically seeks planning permission for: PV panels on the roofs, the provision of external insulated rendering, a substation, and an Air Source Heat Pump and associated enclosure.
- 3.3 The proposal also includes the provision of additional landscaping and will deliver a biodiversity net gain (BNG) meeting the requirement for a 10% gain.
- 3.4 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 North Herts 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 on the basis that they either do not require planning permission or are de minimis in nature.
- Internal changes (do not require planning permission)
 - Bring thermal line inwards.
 - Line the inside face of the sports hall with MDF insulated pane lining
 - Thermostatic Radiator Valves and zonal controls for heating
 - Storing the rejected heat from the Combined Heat and Power
 - Passive Infrared Sensor in office areas
 - Replace existing heat emitters
 - De minimis works (as confirmed with Case Officer as part of pre-application process)
 - Replace existing Kallwall with a like for like, better performing system.
 - Insulate the roof from above, and install new roof membrane (either overlay or strip back and replace)
- 3.5 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 with NHDC

- 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: 24/02240/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 that the dimensions of the proposed panel effect render on the South Elevation take reference from the window scale from the Swimming pool on the front elevation.
 - Requested details on colours proposed and samples of external rendering be submitted as part of the planning application (as opposed to via planning condition).
 - Noted that the preferred location for the Air Source Heat Pumps would be behind the building line of the side elevation of the swimming pool so not in public view from the entrance of the leisure centre.
 - Requested landscape screening for Air Source Heat Pumps.
 - 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.

Pre-Application Discussions with Letchworth Heritage Foundation

- 4.5 Letchworth Heritage Foundation are the freehold owner for North Herts Leisure Centre and a key consultee in Letchworth.

Initial Discussion

- 4.6 At an initial meeting with Letchworth Heritage Foundation, prior to detailed design work being undertaken, identified expectations in relation to the design of the proposal. These were:
- *Insulated panels need to be sympathetic to the building and surroundings i.e. colour and design*
 - *PV alignment needs to be uniform and not staggered or patterned*
 - *Materials and products should be of a good quality and long life*
 - *Not in favour of the use of any external timber panelling*

Detailed Review Prior to Submission

- 4.7 Prior to the submission of this planning application, Letchworth Heritage Foundation were contacted for their views on the proposal. Architype Architects were instructed to review the proposals.
- 4.8 A number of technical considerations were flagged as part of this process for the Applicant to address and it was confirmed that the Heritage Foundation were happy for this application submission to be made.

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.

Energy Statement

- 5.2 An Energy Statement has been prepared by QODA to support this application.
- 5.3 This Energy Statement considers all the works being undertaken at North Herts 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.
- 5.4 The proposed development incorporates a 'fabric first' approach, with the aim of reducing the building's energy demands through a high performing building envelope in line with the SPD targets on "optimizing passive & fabric performance". Heat, ventilation, and light will be provided efficiently through appropriate selection of products, good design practices and controls. Minimising distribution and storage losses from space heat and hot water systems is a significant element of this, and due to the building type, optimising hot water demand is paramount. Technologies such as LED lighting, and high-performance ventilation systems with heat recovery will also be adopted as part of the design.
- 5.5 Low and zero carbon technologies have also been proposed as part of the decarbonisation works at North Herts Leisure Centre. These include Air Source Heat Pumps and onsite photovoltaic (PV). The proposals have maximised PV provision where feasible, in turn generating enough electricity equivalent to 9.5% of the building operation energy through PV generation onsite.
- 5.6 In order to assess the energy efficiency of the proposals, energy modelling was carried out. Results of the energy modelling demonstrate that 72.4% site wide carbon reduction is achieved compared to the baseline case and represents a high-performance, low-carbon development.
- 5.7 With reference to the Council's Sustainability SPD, the proposed development is considered to achieve a silver ranking against the categories 'Optimizing passive design & fabric performance' and 'Achieving low carbon energy'.

Environmental Noise Assessment

- 5.8 An Environmental Noise Assessment has been prepared by Mach Group as part of this application.
- 5.9 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.

- 5.10 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.

Ecology Assessment, Preliminary Roost Assessment and Biodiversity Net Gain

- 5.11 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.
- 5.12 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.
- 5.13 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.
- 5.14 A proposed Landscaping Plan and subsequent BNG assessment have been prepared in relation to the proposed development.
- 5.15 The pre-development score for the site was calculated to be 0.51 habitat units.
- 5.16 The BNG subsequently confirms that the proposals will deliver a biodiversity net gain on-site which complies with legal requirements, specifically a 13.6% net gain.

Tree Survey and Arboricultural Impact Assessment

- 5.17 A Tree Survey and Arboricultural Impact Assessment have been prepared by RPS.
- 5.18 Whilst it is not proposed to remove any trees as part of the design proposals, RPS has identified the requirement to remove 1 individual tree (T2) and 1 tree group (G2) under sound arboricultural management practices. The removals of T2 and G2 are recommended to be carried out, regardless of the implementation of the development proposals. These specimens are structurally compromised and have limited life expectancy, which is why they have been recorded as retention category U.
- 5.19 Most of the arboricultural features on site are to be retained, with over 95% of the individual trees surveyed on site being retained within the context of the proposed development.

Construction Traffic Management Plan

- 5.20 A Construction Traffic Management Plan has been prepared by Willmott Dixon Construction Limited to support this application.
- 5.21 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 (inc. Appendix 5: Letchworth Garden City Design Principles) (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 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
- Appendix 5: Letchworth Garden City Design Principles

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 Planning Policy Guidance (PPG) – March 2014 (as updated)
 - National Design Guide – January 2021
 - Environment Act 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.
 - **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 167** 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).
- **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'*

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 'Policy SP2' identifies Letchworth 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'*.
- 7.3 '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.
- 7.4 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.
- 7.5 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.
- 7.6 North Herts Leisure Centre also falls under an employment use (as discussed at 2.5/2.6) - the proposed decarbonisation works will support the long-term operation of the business (e.g. through reducing operational costs for heating) in accordance with relevant policy. On a similar basis, the decarbonisation works will help to support the long-term future of this building ensuring that its community function can continue.
- 7.7 The principle of development is therefore supported across a range of Local Plan policies.

Sustainability and Climate Change

- 7.8 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 NHLC), it is important to consider sustainability policies in their own right in terms of the compliance of proposals with measures.
- 7.9 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'*.
- 7.10 '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.
- 7.11 '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.
- 7.12 This proposal includes works which are specifically targeted at improving the environmental impact of North Herts Leisure Centre. Photo voltaic panels are proposed and due consideration has been given to their location to maximise solar gains whilst minimising their visual impact. Similarly, external insulation has been located to maximise environmental benefits whilst minimising the visual impact. The Air Source Heat Pump again will secure these long-term environmental benefits, but has been located in an unobtrusive area of the site behind the exiting building line (as per pre-application discussion recommendations) and landscape screening is proposed to further reduce impacts.
- 7.13 As discussed in detail in Section 5, an Energy Statement will be submitted as part of this application which evidences the significant improvements that will result from all the works collectively being undertaken at North Herts Leisure Centre and outlines how the proposals address requirements set out in the Sustainability SPD.
- 7.14 The proposal complies with Local Plan policies related to sustainability and climate change.
- 7.15 As noted previously, the principle of the decarbonisation works are 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

- 7.16 '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'*.

- 7.17 The decarbonisation works constitute enhancements to the existing leisure centre and these will help to support its ongoing operation e.g. reducing operational costs; 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.
- 7.18 The proposal is supported by the provisions of Policy SP10.

Architecture and Urban Design

- 7.19 '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 D1 references 'Appendix 5: Letchworth Garden City Design Principles' of the Local Plan which requires development proposals to reflect 'Garden City' layout and design principles.
- 7.20 'Policy SP9: Design and Sustainability' 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'*.
- 7.21 The proposed development has sought to respond to its setting; the proposed external rendering has been designed and located so as to be sympathetic to the existing building in terms of its scale, massing and appearance.
- 7.22 The solar panels on the roofs have been located to be as visually un-obtrusive as possible and in a regimented layout in response to earlier feedback from the Heritage Foundation.
- 7.23 The Air Source Heat Pump has been located to be behind the existing building line in order to minimise visual impact and this has been supplemented by the inclusion of additional landscape screening.
- 7.24 Both the Heritage Foundation and the Council's views have been sought as part of the evolution of the proposal design, as well as in relation to more detailed aspects of the proposed development such as material choices as part of the pre-application process.
- 7.25 Please see the submitted Design and Access Statement for more information on the evolution of design on this site.
- 7.26 The proposal meets relevant policy requirements in relation to design.

Landscaping

- 7.27 'Policy NE2: Landscape' seeks to ensure that development responds to its landscape context, protecting and enhancing as necessary.
- 7.28 Additional landscaping forms part of the BNG strategy on this site and is shown on the submitted Landscaping Plan prepared by RPS. The proposed planting is proposed adjacent to the northern elevation of the leisure centre and comprises 9no. additional trees and scrub mix planting.

- 7.29 The proposal also includes the provision of landscape screening in relation to the ASHP enclosure so as to reduce its visual impact and visibility from the entrance of the site.
- 7.30 The proposed landscaping is in accordance with relevant policy.

Ecology

- 7.31 '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.
- 7.32 A Preliminary Ecological Appraisal (PEA) and a Preliminary Roost Assessment have been prepared by RPS have been submitted as part of the application, in addition to a Biodiversity Net Gain (BNG) Assessment.
- 7.33 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.
- 7.34 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.
- 7.35 Appropriate conditions can secure relevant provisions in relation to ecology to ensure compliance with policy.
- 7.36 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.

Parking

- 7.37 Policy T2: Parking and the related Parking SPD seek to ensure development proposals have sufficient parking in accordance with standards.
- 7.38 It is noted that the development includes the loss of a single parking space in order to facilitate the proposed substation. However, in the context of the extensive wider parking on site and given that the proposal does not seek to increase the floor space of the leisure centre, this loss is not considered to be material nor is not sufficient to outweigh the significant environmental benefits associated with the proposals in the planning balance.

Amenity

- 7.38.1 '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.
- 7.39 This planning application is supported by an Environmental Noise Assessment prepared by Mach Group. This has been produced as a result of the perceived noise implications of the proposed ASHP and 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.
- 7.39.1 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 at North Herts 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 general principle of the decarbonisation works is supported under local policy by virtue of the environmental improvements that will be delivered and the NPPF is clear that significant weight should be given 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.
- 8.4 The proposed development has also addressed key considerations in relation to design, amenity, ecology and sustainability. Letchworth Heritage Foundation have been consulted as part of the evolution of the proposals to ensure that the development conforms to the established Garden City Design Principles.
- 8.5 The proposal is broadly in accordance with the adopted Local Plan.
- 8.6 It is further noted that the principle of the decarbonisation works are supported at a National level through legislation, 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.
- 8.7 The proposed development will satisfy the three elements of sustainable development: economic; social and environmental, as set out in the NPPF.
- 8.8 In view of the above, the proposal should be granted planning permission forthwith.

