



DESIGN, PLANNING AND HERITAGE STATEMENT

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



0.0 Contents

1.0 Introduction

2.0 The Old School House (4 Market Hill)

3.0 Planning History

4.0 The Brief

5.0 The Challenges

6.0 The Solutions

7.0 National Planning Policy Context:

8.0 Local Planning Policy Context:

9.0 Policy Discussion

10.0 Previous Appeal Decision

11.0 Conclusion

12.0 Site Photographs

1.0 Introduction

- 1.1 This statement has been prepared by Mark Cotton, a Chartered Architect with over 20 years' experience of designing developments for sites in locations across the United Kingdom, including work to historic buildings.
- 1.2 This statement provides an assessment of the locally listed Old School House, an outline of the brief and the various challenges posed by current legislation and the condition of the existing fabric and set out a justification for the proposed solution, demonstrating that it is compliant with both Local and National Planning Policies.

2.0 The Old School House (4 Market Hill)

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

- 2.2 The entry for the building within the Register of Buildings of Local Interest states:

"Former Royston National School, Fish Hill. The National School was built in 1886 for the children of Church of England families of Royston. It is a flint building with gault brick dressings and chimneys. Its location between Fish Hill and Market Hill results in it fronting and contributing to both streets.

The school provides a strong building line to both streets and has an enclosed courtyard facing onto Market Hill. The angled chimneys in gault brickwork at regular positions along the eaves make a particular architectural contribution. The use of flint is a characteristic within the town and is emphasised on the building's Market Hill elevation."

- 2.3 The reason given for including the Old School House withing the Register of Buildings of Local Interest is:

"Building of local interest to the social and educational history of the town constructed in local materials strongly characteristic of the town.

- 2.4 The description of the building given above is not entirely accurate, since the flint is only on limited areas on the lower elements of the building. For the most part the elevations are of gault brick with red brick quoins and a stepped red brick feature along the verges of the tall roof, as well as outlining the triangular arches on the Market Hill elevation.

- 2.5 In addition, there are redbrick lozenge shaped features just below the top of the gables. These features are of great importance to the visual quality and attractiveness of the building.

- 2.6 The Conservation Area Townscape Analysis dating from March 2017 states that:

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

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

2.7 The existing fibre cement roofing slates on both parts of The Old School House are well overdue for replacement and there are now signs of significant water ingress internally, particularly in the Meeting Hall.

2.8 Areas of significant rot are visible to the large painted timber window overlooking Fish Hill.

3.0 Planning History

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

<u>Decision Date:</u>	<u>Application:</u>	<u>Description:</u>	<u>Decision:</u>
3rd January 2001	00/01684/1	Change of use from retail to cafe and meeting room with ancillary facilities	Conditional Permission
11th April 2025	24/02696/FP	Full Planning Application - Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and flush mounted photovoltaic panels following removal of existing roof vent.	Refuse
25 th September 2025	25/01343/FP	Full Planning Application - Raise existing roof ridge height and replace existing slate roof coverings with fibre cement slates and installation of insulation.	Refuse

3.2 An Appeal (ref: APP/X1925/W/25/3366316) was made under section 78 of the Town and Country Planning Act 1990 (as amended) against the refusal of application reference 24/02696/FP.

3.3 The Appeal was dismissed on 10th November 2025 on the basis that:

(Para. 9) "...raising of the ridge height, brings a substantial concern about the effect of this on the decorative details on the gable elevations. Drawing No.19/010/A/006 shows that raising the ridge involves raising both roof slopes, from eaves up to the new ridge level.

I appreciate the appellants' point that the Heritage and Conservation Officer did not comment beyond the fact that there would be a minimal impact from the extra height, but it is difficult to see how this would be achieved without damaging the stepped features in red brick and the lozenge feature.

I consider that any harm to these features would be unacceptable, certainly amounting to less than substantial harm, of medium degree. I also have to consider the fact that The Old School House is within the Royston Conservation Area: such harm would not preserve or enhance its character or appearance."

3.4 However, the Inspector also found that:

(para 12) "...the photovoltaic panels, would be beneficial in making a positive contribution towards energy savings and, with the proposed insulation, would be likely to improve the overall energy efficiency of the building. They would be installed flush and integrated into the roof, and their dark colour would make them reasonably unobtrusive against the slates.

The roof plane on which they would be installed is visible coming down Market Hill, although intermediate buildings would reduce the visual impact. On balance, taking account of the environmental benefits, I do not consider that their appearance would materially affect the conservation area sufficiently to warrant refusal."

4.0 The Brief:

4.1 The Applicants have carried out significant internal improvements in recent years to facilitate the use of the building as a community asset with various local groups, charities and businesses making use of the facilities, however, the existing roofing slates on both parts of The Old School House are well overdue for replacement and there are now signs of significant water ingress internally, particularly in the Meeting Hall.

4.2 In order to ensure the continued viability of the building and prevent the building deteriorating further the applicants have decided to replace the existing roof finishes and, to improve the suitability of the building, introduce flush mounted photovoltaic panels whilst carrying out the reroofing works.

4.3 Having investigated options for the removal and repair of the rot to the timber window overlooking Fish Hill, the Applicants have determined that their preferred option is to replace the existing window as this is a more cost-effective solution in the medium to long term.

5.0 The Challenges:

Replacement of the existing roof coverings:

5.1 Approved Document Part L1 of the current Building Regulations states that any existing thermal elements being renovated (or renewed) should meet minimum 'limiting' standards with regards thermal performance. The required minimum standard for roofs in existing buildings of this type is 0.16w/m²K.

5.2 The existing single storey block along Fish Hill has had the thermal performance of its external walls improved and some insulation introduced under the existing roof structure during a previous internal refurbishment and its roof achieves a U-value of 0.258 w/m²K. the roof of the Meeting Hall is uninsulated and achieves a U-value of 1.536 w/m²K.

5.3 The single storey flint building which was previously the Royston National School Building has, at some stage, been sub-divided with part of that building being occupied by the adjacent Dentist Practice and part being within the application site and, therefore, any roof replacement works must ensure that the existing roof plane is preserved.

5.4 The replacement of the roof coverings of this lower roof will require additional insulation to be introduced between and under the existing rafters, an approach which was anticipated during the previous refurbishment works with insulation being introduced to the underside of the rafters (see para 5.2 above).

- 5.5 The roof over the Meeting Hall is unaffected by any adjacent roofs and, therefore, is not constrained in the same way as the lower-level roof and it is, therefore, possible to introduce insulation either between and below the existing rafters as in the lower building or over and between the existing rafters.
- 5.6 Internally this part of the building benefits from exposed collar tied timber roof trusses and diagonal timber boarding fixed to the underside of the existing rafters, all of which contributes to the historic character of the building.
- 5.7 Installing insulation below and between these rafters would result in the removal of the timber boarding and the partial obscuring of the trusses whilst insulating over and between the same rafters would preserve these elements but would result in an increase in the height of the existing roof.
- 5.8 As determined by the Planning Inspector (see above) there is a perceived concern about the effect on the decorative details on the gable elevations, in particular how the raising of the roof might damage the stepped features in red brick and the lozenge feature.

Replacement of the existing window:

- 5.9 As stated above, Approved Document Part L1 of the current Building Regulations states that any existing thermal elements being renovated (or renewed) should meet minimum 'limiting' standards with regards thermal performance. The required minimum standard for windows in existing buildings of this type is 1.2w/m²K.
- 5.10 The existing window is single glazed which will have a U-value of somewhere between 4.0 and 6.0 W/m²K.
- 5.11 Any replacement window must balance the requirement to achieve the above U-value with the application site's location within a Conservation Area.

6.0 The Solutions:

Replacement of the existing roof coverings:

- 6.01 The solution to the requirement to thermally upgrade the roof to the single-storey building along Fish Hill is dictated by the nature of the building itself and the fact that The Applicants do not have control over the whole of the original building.
- 6.02 These constraints limit the options to those articulated above and, therefore, it is proposed to introduce insulation between the existing rafters, once the existing roof finishes have been removed, to complement the insulation which has already been placed under the rafters and allow the replacement roof finishes to continue within the same plane as the existing finishes of the adjoining part of the building.
- 6.03 This approach will improve the U-value of this part of the thermal envelope from 1.536 w/m²K to 0.134 w/m²K which is substantially better than the required 'limiting' U-value stated in Approved Document Part L2.
- 6.04 The preferred solution for the high-level roof over the Meeting Hall is driven by the desire to preserve the visibility of the existing historic fabric inside the building.
- 6.05 Whilst this will require an increase to the ridge height of the existing building, it is our view that the increase is minor considering the overall height of the existing building and will not result in an adverse impact upon the character of the building nor the surrounding conservation area.

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6.06 This approach will improve the U-value of this part of the thermal envelope from 0.258 w/m²K to 0.159 w/m²K which is better than the required 'limiting' U-value stated in Approved Document Part L2.

6.07 The Officers Report for application 24/02696/FP states that:

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

As a result of the likely inability to replicate the existing detailing, I find the proposed alteration to increase the ridge height of the high-level building to be inappropriate and unacceptable"

6.08 This would suggest that it is the perceived likelihood that the existing detailing cannot be replicated that is the major concern rather than the increased ridge height itself and, indeed, the Planning Inspector's comments would also suggest that it is the perceived risk to that feature that is of primary concern.

6.09 To overcome this perception, it is proposed that the existing red feature brickwork be carefully removed and set aside with new yellow facing brickwork, selected to match the existing, being used to achieve the required increase in gable height. The red facing brickwork which was previously set aside would then be used to reinstate the existing detail to the perimeter of the gables.

7.0 National Planning Policy Context:

7.1 The current version of the National Planning Policy Framework (NPPF) was published on 12 December 2024 and amended in February 2025 and is a material consideration in planning decisions

7.2 Paragraph 2 of the NPPF states that:

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

7.3 Paragraph 7 of the NPPF states that:

"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 way. 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..."

7.4 Paragraph 8 of the NPPF states that:

"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

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- a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

7.5 Paragraph 9 of the NPPF states that:

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

7.6 Paragraph 11 of the NPPF states that:

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

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

7.7 Paragraph 39 of the NPPF states that:

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

7.8 Paragraph 48 of the NPPF states that:

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

7.9 Paragraph 56 of the NPPF states that:

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

7.10 Paragraph 98 of the NPPF states that:

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

- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community...”*

7.11 Paragraph 161 of the NPPF states that:

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

7.12 Paragraph 163 of the NPPF states that:

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

7.13 Paragraph 165 of the NPPF states that:

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

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

7.14 Paragraph 167 of the NPPF states that:

“Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

7.15 Paragraph 168 of the NPPF states that:

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

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

7.16 Paragraph 202 of the NPPF states that:

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

7.17 Paragraph 210 of the NPPF states that:

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

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

7.18 Paragraph 212 of the NPPF states that:

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

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7.19 Paragraph 215 of the NPPF states that:

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

7.20 Paragraph 216 of the NPPF states that:

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

7.21 Paragraph 221 of the NPPF states that:

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

7.22 The NPPF contains the following definitions:

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

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Setting of a Heritage Asset:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

Significance
(for heritage policy):

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.

8.0 Local Planning Policy Context:

8.1 The North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022.

8.2 The Local Plan forms part of the statutory Development Plan for the District that is used to determine applications.

8.3 The Development Plan for North Hertfordshire consists of:

- The Local Plan
- Neighbourhood Plans for the following areas:
 - Ashwell
 - Baldock, Bygrave & Clothall
 - Ickleford
 - Knebworth
 - Pirton
 - Preston
 - Wallington
 - Wymondley
- The adopted Minerals Local Plan and Waste Local Plan for Hertfordshire

8.4 Local Plan Policy D1 (Sustainable Development) states that:

“Planning permission will be granted provided that development proposals:

- a) Respond positively to the site’s local context;*
- b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:*
 - i. create or enhance public realm;*
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);*
 - iii. reduce energy consumption and waste;*

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- iv. *retain existing vegetation and propose appropriate new planting;*
 - v. *maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;*
 - vi. *future proof for changes in technology and lifestyle;*
 - vii. *design-out opportunities for crime and anti-social behaviour; and*
 - viii. *minimise the visual impact of street furniture and parking provision;*
- c) *Have regard to the Design SPD, and any other relevant guidance;*
- d) *Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and*
- e) *For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards."*

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

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

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

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

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

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

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

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

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

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

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

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

In assessing renewable and low carbon energy proposals against the above criteria the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions, and the social benefits of community owned schemes where this is relevant.

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

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

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

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

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

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

Avoid significant alternation to roof structure

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

- Avoiding prominent and highly visible roof slopes of primary elevations*
- Considering roof slope of rear and secondary elevations*
- Considering inner roof slope of double pitched, M style roof*
- Avoiding reflective materials and match the colour of the existing roof covering*

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

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

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

9.0 POLICY DISCUSSION

Sustainability

- 9.1 It is clear that the Nation Planning Policy Framework is a material consideration for Local Planning Authorities when considering Planning and Conservation Area Consent Applications (Paragraph 2) whilst also making it clear that the purpose of the Planning system is to contribute to the achievement of sustainable development, meeting the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7).
- 9.2 The framework then sets out the three overarching objectives for the planning system which aim to ensure that the system achieves sustainable development, these objectives include a social objective (supporting strong, vibrant and healthy communities) and an environmental objective (protecting our built and historic environment whilst using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy). (Paragraph 8)
- 9.3 The framework also makes it clear that there should be a presumption in favour of sustainable development (Paragraph 11) and that Local Planning Authorities should be working proactively with Applicants to secure developments which will secure economic, social and environmental improvements to an area. (Paragraph 39)
- 9.4 The NPPF also places emphasis on allowing established facilities and services to be able to develop and modernise so that they are retained for the benefit of the community (Paragraph 98).
- 9.5 The framework also stresses the need for the planning system to:
- support the transition to net zero by 2050 (Paragraph 161);
 - consider the need to mitigate and adapt to climate change (Paragraph 163);
 - help increase the use and supply of renewable and low carbon energy (Paragraph 165); and
 - give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings (Paragraph 167)
- 9.6 There is also a requirement that Local Planning Authorities should recognise that small-scale and community-led renewable energy projects provide a valuable contribution to cutting greenhouse gas emissions when determining Planning Applications (Paragraph 168).
- 9.7 It is clear from the above that the NPPF expects Local Planning Authorities to work proactively to support proposals that bring the environmental and social improvements to an area and, in particular, those proposals that help existing facilities develop and modernise so that they can be retained for the benefit of the community.

- 9.8 It is also clear that there is a requirement for Local Planning Authorities to give significant weight to proposals which seek to reduce carbon emission through the introduction of renewable or low energy technology.
- 9.9 Given that the proposals illustrated within this application seek to reduce carbon emissions through the improvement of the thermal performance of the existing fabric of the building and the introduction of photovoltaic panels with the overall aim of ensuring that the existing building can continue to play an important role within the community of Royston, they must be given significant weight as directed by the NPPF.
- 9.10 The North Hertfordshire Adopted Local Plan 2011-2031 is also supportive of sustainable development with Local Plan Policy D1 making it clear that development proposals are expected to reduce energy consumption and waste and be future proof for changes in technology and lifestyle.
- 9.11 Local Plan Policy NE12 reflects the presumption in favour of proposals for renewable and low carbon energy developments subject, in this instance to an assessment of the impact upon the setting of historic assets.
- 9.12 And whilst this building is not a Listed Building (Designated Heritage Asset) the principles of Section 9 of North Herts District Council's Adopted Sustainability SPD are relevant.
- 9.13 As with the content of the NPPF, the Adopted Local Plan Policies make it clear that sustainable development benefits from the presumption in favour of approval which must be significantly outweighed by any perceived harm to both the application site and wider Conservation Area.

Heritage

- 9.14 There is, of course, a need to assess the proposals not just against the social and environmental objects associated with the requirement to achieve sustainable development but also the historic nature of the existing building and the character of the surrounding Conservation Area.
- 9.15 It is worth noting that the application site is not a listed building and, as a result, cannot benefit from relaxations under the Building Regulations from the requirements to improve the thermal efficiency of those elements of the external fabric which require replacement and/or refurbishment.
- 9.16 The NPPF recognises that heritage assets should be sustained and enhanced and put to viable uses consistent with their conservation (Paragraph 210) and requires Local Planning Authorities to give great weight to a designated heritage asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm (Paragraph 212).
- 9.17 There is also a requirement for Local Planning Authorities to weigh any harm to a designated heritage asset (i.e. the conservation area) against the public benefits of the proposals, including securing its optimum viable use (Paragraph 215).
- 9.18 Given that the application site is a non-designated heritage asset, the provision of Paragraph 216 of the NPPF also apply which requires the Local Planning Authority to make a balanced judgement having regard to the scale of the harm and the significance of the heritage asset.
- 9.19 It is clear that the NPPF wants Local Planning Authorities to sustain and enhance both designated and non-designated heritage assets and put them to viable uses consistent with their conservation.

- 9.20 There is little debate that the current use of The Old School House brings with it great public benefit and that the proposals will sustain and enhance that offering within Royston by securing its long-term use and conserving the heritage asset for generations to come.
- 9.21 Therefore, a balanced judgement will need to be made between the impact of the proposals upon the wider Conservation Area and the public benefit that these proposals will secure.
- 9.22 Local Plan Policy HE1 sets out the policy position with regards designated heritage assets, in this case the Conservation Area, and makes it clear that Planning Permission will be granted as long as the proposals:
- enable the designated asset to be used in a manner that secures its conservation and preserves its significance;
 - include a palette of materials which make a positive contribution to the character of the Conservation Area; and
 - lead to less than substantial harm to the Conservation Area where this harm is outweighed by the public benefit of the development.
- 9.23 Local Plan Policy HE3 articulates the policy position with regards non-designated heritage assets, in this case the application site, and requires a balanced judgement to be made with regards the scale of the harm or loss of significance to the building.
- 9.24 The proposals which are subject of the application will not affect the ability of the Conservation Area to be used in a manner that secures its conservation and preserves its significance and, therefore, the first test of Policy HE1 must be considered mute.
- 9.25 Equally, the proposed materials to be used within the development can be made subject of a conditional approval to ensure that the Local Planning Authority maintain some control over the contribution that the development makes upon the Conservation Area.
- 9.26 The only remaining judgement has to be whether the proposals amount to 'less than substantial harm' to the Conservation Area or exceed that threshold and, if they don't exceed the threshold, whether the public benefit outweighs the harm caused by the proposals on the wider Conservation Area.
- 9.27 Given the limited nature of the proposals and the obscured views of the application site from the rest of the Conservation Area, there can be little debate that the proposals amount, at worst, to 'less than substantial harm' to the Conservation Area and, as previously articulated, the public benefit in conserving the non-designated heritage asset, ensuring its long-term sustainability and, thus, its viability within the streetscape must be given significant weight.
- 9.28 Adopted Policy HE3 is unclear as to what considerations should be balanced against any perceived harm or loss of significance to the non-designated asset when the Local Planning Authority are making their 'balanced judgement' and, therefore, the provisions of Paragraph 216 of the NPPF must be assumed to apply.
- 9.29 These require a balanced judgement between the scale of any harm or loss and the significance of the heritage asset.
- 9.30 The Register of Buildings of Local Interest states that The Old School House is included as a result of its local interest to the social and educational history of the town and its construction from local materials strongly characteristic of the town.

- 9.31 The proposals articulated in this application will not affect its local interest and/or the materials used within its construction and, therefore, it has to be considered that its significance will not be significantly harmed.

10.0 Previous Appeal Decision

- 10.1 This application is substantially similar to Planning Application reference 24/02696/FP which was subject to Appeal reference APP/X1925/W/25/3366316 and the Decision in that Appeal is a material consideration with regards this application in so much as that there is significant overlap between this application and the previous scheme proposals.
- 10.2 For the sake of clarity, the replacement of the existing window overlooking Fish Hill did not form part of the previous application which was subject of the Appeal.
- 10.3 In dismissing the Appeal, the Planning Inspector concluded that the replacement of the roof finishes was not, in and of itself, objectionable and that the choice of materials could be controlled through the application of a suitably worded condition.
- 10.4 He also concluded that:

“...the photovoltaic panels, would be beneficial in making a positive contribution towards energy savings and, with the proposed insulation, would be likely to improve the overall energy efficiency of the building. They would be installed flush and integrated into the roof, and their dark colour would make them reasonably unobtrusive against the slates. The roof plane on which they would be installed is visible coming down Market Hill, although intermediate buildings would reduce the visual impact. On balance, taking account of the environmental benefits, I do not consider that their appearance would materially affect the conservation area sufficiently to warrant refusal”

- 10.5 Regardless, The Inspector decided that raising of the ridge height brings a substantial concern about the effect of this on the decorative details on the gable elevations, in particular he found it difficult to see how the lifting of the ridge would be achieved without damaging the stepped features in red brick and the lozenge feature and considered that any harm to these features would be unacceptable, amounting to less than substantial harm, of medium degree which would not preserve or enhance the character or appearance of the Conservation Area.
- 10.6 It is clear from the Appeal Decision that it was the impact upon the detailing around the gable ends of the building that was considered objectionable rather than the installation of the photovoltaic panels, the raising of the ridge itself or the replacement of the roof coverings.
- 10.7 This application proposes an alternative approach to the gable end detailing to overcome that objection as articulated in paragraph 6.09 of this document.

11.0 Conclusion

- 11.1 The applicants are aware of their responsibilities to maintain and preserve The Old School House as a heritage asset of local significance within Royston and, faced with the immediate need to replace the existing roof coverings to ensure that further water ingress does not occur, have sought to balance the technical and legislative requirements around the replacement of the roof coverings with the need to ensure that any proposed works do not have an unacceptable impact upon the historic character of the building and the wider Conservation Area.

continued over...

- 11.2 The proposed works to the lower-level building are of little visual impact with additional insulation being introduced to meet the technical requirements of the Building Regulations without the need to alter the external appearance of the building.
- 11.3 The proposed alterations to the high-level roof strike a sensible balance between minimising the impact upon the appearance of the non-designated heritage asset, particularly internally, and the character of the Conservation Area with the need to replace the failed roof covering whilst achieving appropriate levels of insulation and improving the sustainability of the building as a whole.
- 11.4 The proposed installation of photovoltaic panels during the replacement of the roof coverings has been found to be acceptable by the Planning Inspectorate.
- 11.5 The principal of raising the ridge height has also been deemed acceptable with regards its impact upon the wider Conservation Area by the Planning Inspectorate.
- 11.6 The Planning Inspectorate have agreed that the materials to be used in the replacement of the roof coverings can be controlled by way of a suitably worded condition.
- 11.7 The Planning Inspectorate expressed concerns with regards the likelihood of damage to the gable end stepped brickwork detailing during the works required to raise the ridge, accordingly the proposed approach to this detail has been amended to ensure that this detail can be reinstated in its current form once the ridge has been lifted.
- 11.8 The replacement of the feature window overlooking Fish Hill is a new proposal and care has been taken to ensure that the design and proposed materials for this replacement window are appropriate to its siting within the Conservation Area.
- 11.9 Taking into account the fact that views of this window are extremely limited due to the restricted width of Fish Hill, the impact of its replacement upon the Conservation Area is considered minor.
- 11.10 The Building Regulations require the replacement window to have a greater u-value than it currently has which precludes the reinstatement of a single glazed window, necessitating either the installation of double glazing or secondary glazing behind a single glazed unit. The second of these two options is technically challenging due to the size and, in particular, the height of the original window and, therefore, the decision has been made to install a timber framed double glazed replacement.
- 11.11 Both National and Local Policy support the principle of allowing buildings to adapt, develop and become sustainable in order to ensure their long-term survival and continued use with great weight be attached to the sustainability of proposals, even where the proposals affect a designated historical asset (such as the Conservation Area) or a non-designated asset such as The Old School House.
- 11.12 The main proposals which form part of this application have either been found to be acceptable by the Planning Inspectorate or have been revised since the previous application to reflect the comments made within the Appeal Decision.
- 11.10 It is, therefore, our assessment that Planning and Conservation Area Consent should be granted for these proposals.

12.0 Site Photographs











