

Feb 2020

Planning Policy Statement for proposed replacement welfare unit

Blakes Lock, Kennet Side, Reading, RG1 3DS

On behalf of Elite Systems (GB) Limited

Prepared by:



Contents

1	Introduction	1
2	Site Description	2
3	Proposed Development	3
4	Planning Policy Review	4
5	Planning Assessment	7
6	Summary	9



ALISTAIR FLATMAN PLANNING
...a Positive Approach

1.0 Introduction

- 1.1 This Planning Policy Statement has been prepared on behalf of Elite Systems (GB) Limited to support a planning application for a replacement welfare unit at Blakes Lock, Reading.

Background and Need for the Development

- 1.2 In March 2019, Ridge Consulting undertook a site condition survey of an array of lock facilities across Thames Area. As part of this, the lock keeper facilities at Blakes Lock were identified as needing improvement.
- 1.3 The need for better welfare facilities at Blakes Lock is a high priority as the lock has now been allocated a full time lock keeper rather than relying on visiting lock keepers to manage the site.
- 1.4 The lock and lock island is owned by the Environment Agency.
- 1.5 The site condition survey undertaken by Ridge identified the need for a new building providing new welfare facilities. The facilities required to ensure the health, safety and wellbeing of the lock keeper and relief staff include a WC, shower, basic kitchen facilities, a mess room/office area and storage

Planning History

- 1.6 The site is not subject to any relevant planning history.

The Planning Application

- 1.7 This statement describes the application site and nature of the proposal (Chapters 2 and 3) together with an assessment of planning policy issues (Chapters 4 & 5) of relevance to the application. Assessment of the planning application is set out in Chapter 5 with conclusions set out in Chapter 6.
- 1.8 This statement will fully justify the proposal for the site and will advance justification for the replacement welfare building.
- 1.9 On the basis of the information provided in this statement, the associated supporting documents and on the application drawings, a presumption in favour of development can be maintained in this particular instance, the application being in accordance with the advice set out in the NPPF.
- 1.10 The planning application is supported by the following:
- i. Completed application forms, with all certificates signed and dated;
 - ii. Site Location Plan prepared by Elite Systems;
 - iii. Site Layout Plan, Floorplans and elevations prepared by Elite Systems;
 - iv. Design and Access Statement prepared by Elite Systems;
 - v. Ecological Advice note; and
 - v. Planning Statement prepared by Alistair Flatman Planning;
- 1.11 The submitted additional technical information is considered sufficient to enable the Local Planning Authority to determine the clear merits of the proposed development.

2.0 Site Description

- 2.1 The existing welfare facilities building is located at Blakes Lock on the River Kennet just north of Locks Place in the centre of Reading. The postcode for the site is RG1 3DS.
- 2.2 The current welfare facilities are located on the lock island between the lock cut and weir stream. These comprise a small wooden lock office, a small standalone WC cabin and a timber storage shed which is in a very poor condition. There are no kitchen or mess room facilities, shower or office space.
- 2.3 A series of photographs are lodged with the application showing the condition of the existing building.
- 2.4 The lock and lock island is owned by the Environment Agency and has two tenanted residential properties. The downstream end of the island is used by the Reading Sea Cadets.
- 2.5 The island is accessed via the walkway over the head lock gates.
- 2.6 The site sits in Flood Zone 1.
- 2.7 The River Kennet is identified as an area of Biodiversity Interest in the Local Plan (An Ecological Advice note has been prepared and is lodged with the application accordingly). Existing trees on the island remain unaffected.

3.0 The Proposed Development

- 3.1 The proposal constitutes erection of a replacement welfare building. This single welfare building will replace the existing structures on site in a similar location.
- 3.2 The aforementioned building survey identified the need for a new building providing new welfare facilities. The facilities required to ensure the health, safety and wellbeing of the lock keeper and relief staff.
- 3.3 As such the proposed building will include a WC, shower, basic kitchen facilities, a mess room/office area and storage.
- 3.4 The building will be modular construction with flat roof. Floor area will be 6.2m x 3.5m with flat roof at 2.6m. There is no need to remove any trees to site the proposed building.
- 3.5 The proposed materials will be :
 - The external walls will be plastic coated steel – colour grey with black roof
 - External doors – steel – merlin grey.
 - Window frames - uPVC, colour white.
 - Rainwater Goods – black upvc
- 3.6 Access to the building will be as existing across the lock bridge via the locked gate.

4.0 Planning Policy Review

National Planning Policy Framework

- 4.1 The National Planning Policy Framework (revised Feb 2019) sets out the government's planning policies for England and how these are expected to be applied. The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 4.2 Set out below is a summary and assessment of the relevant sections of the NPPF.
- 4.3 The National Planning Policy Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. The guidance advises that the policies in paragraphs 1-211 taken as a whole constitute the government's view on what sustainable development in England means in practice for the planning system.

Achieving Sustainable Development

- 4.4 Paragraphs 7, 8 and 11 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.5 Paragraph 11 sets up the presumption in favour of sustainable development stating:

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-date⁷, 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 proposed⁶; 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.

Design

- 4.11 Chapter 12 of the NPPF refers to Design and advises that good design is a key aspect of sustainable development.
- 4.12 Paragraph 127 sets out a number of design criteria to be considered in terms of design of development stating:

Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Meeting the challenge of climate change, flooding and coastal change

- 4.13 Paragraph 155 of Chapter 14 confirms that development should be directed to areas with the lowest probability of flooding. The site lies within Flood Zone 1 and is therefore at low risk from flooding.

Conserving and enhancing the natural environment

- 4.14 Paragraph 170 of Chapter 15 advises that the planning system should contribute to and enhance the natural and local environment by: -
- *a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - *b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - *c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - *d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
 - *e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
 - *f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."*

- 4.15 Paragraph 175 relates to ecology and biodiversity considerations when determining planning applications.
- 4.16 The site itself is not subject to any ecological, or landscape designations and is not considered to be a valued landscape. However, it is noted the River Kennet is an Area of Biodiversity Interest. As such an Ecological Advice note has been prepared and submitted in support of the application.
- 4.17 There are no known protected species or ecology designations on site. As such it is considered the site is of low wildlife value and the proposal will have no effect on any ecological interests. Further details are set out in the submitted Ecological Advice note.

Development Plan

- 4.18 The site falls within Reading BC administrative area and as such the Development Plan for the site comprises the Adopted Local Plan (2019).
- 4.19 The key issues are considered to be design and proximity of the site to the River Kennet Area of Biodiversity Interest.
- 4.20 As such policies CC7 and EN12 are considered relevant.
- 4.21 Policy CC7 'Design and the Public Realm' seeks to ensure all developments are of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. A number of criteria are set out in the policies addressing the various components of development form.
- 4.22 Policy EN12 'Biodiversity and the Green Network' seeks to ensure that developments do not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.
- 4.23 Other policies of note are CC1 (Presumption in Favour of Sustainable Development) and EN18 (Flooding and Drainage), both of which reflect guidance set out in the NPPF in relation to principles of sustainable development and directing development to areas at lowest risk of flooding respectively.
- 4.24 These policies are assessed in Section 5.

5.0 Planning Assessment

Principle of Development / Need

- 5.1 The site comprises a number of dilapidated storage and welfare buildings that are no longer fit for purpose. Following recent building survey exercise it was recommended that new a building was required to replace existing and provide the necessary standard of welfare facilities for the lock keeper.
- 5.2 The submitted photographs demonstrate the poor condition of the existing buildings and the need for replacement is considered to be clear and justified.
- 5.3 The proposed welfare building is modest in size and will replace those existing on site. Importantly, the proposed building will deliver the required welfare facilities to enable the lock keeper to perform their function effectively and efficiently.
- 5.4 As demonstrated below and in the submitted plans / ecology report, the proposal does not give rise to any harm in terms of visual amenity, ecology, landscape or flood risk and so there are no grounds to refuse the application for replacement building.
- 5.5 In light of the above it is considered the proposal complies with national guidance set out in the NPPF and Local Plan policy CC1 in terms of encouraging sustainable development. As such the principle of development is acceptable.

Design

- 5.6 The proposed building is modest in scale being 6.2m in length x 3.5m wide and 2.6m in height. The modular construction delivers a lightweight structure that is fit for its purpose. The scale and design is appropriate for this setting and will improve the appearance of the lock through the replacement of existing dilapidated structures. The design of the building is informed by its purpose
- 5.7 The exterior finish will be grey plastic coated steel with black EPDM single ply roof membrane.
- 5.8 Local Plan policy CC7 seeks to ensure development proposals maintain and enhance the character and appearance of the area in which they are located. The proposed replacement building will deliver a simple structure on site, designed to meet the welfare requirements of the lock keeper to enable them to undertake their role effectively and safely. It is considered the design, scale and materials are appropriate and that the building will sit comfortably on the site. The proposal will be a clear benefit on the existing situation with the dilapidated buildings. Furthermore, retention of trees on site will assist in screening the building or providing a landscape backdrop depending on viewpoint into the site.
- 5.9 As such the proposal is considered to enhance the site and is therefore consistent with policy CC7 and guidance set out in the NPPF.

Ecology

- 5.10 The site sits within the River Kennet corridor. The river is identified as an Area of Biodiversity Interest. An Ecological Advice note has been prepared to support the application. The proposal will not require removal of any trees.
- 5.11 The ecological survey work undertaken demonstrates the proposal will not give rise to any harm to any ecological interests.
- 5.12 The Ecological Advice note confirms no evidence of any protected species on site. A number of general mitigation / best practice measures are suggested during commencement / construction of the proposed building together with options for enhancement in terms of providing bird and bat boxes on site.
- 5.13 As such the proposal complies with the requirements of Local Plan policy EN12 and guidance set out in the NPPF.

Flood Risk

- 5.14 The site sits in FZ1 and is not therefore considered to be at risk from flooding.

6.0 Summary

- 6.1 This Planning Policy Statement has been prepared on behalf of Elite Systems (GB) Limited to support a planning application for replacement welfare building at Blakes Lock on the River Kennet in Reading.
- 6.2 The building is required by the Environment Agency to provide welfare and storage facilities for the Lock Keeper.

The Application Site

- 6.3 The existing buildings are located at Blakes Lock on the River Kennet just north of Locks Place in the centre of Reading. The postcode for the site is RG1 3DS.
- 6.4 The current welfare facilities are located on the lock island between the lock cut and weir stream. These comprise a small wooden lock office, a small standalone WC cabin and a timber storage shed which is in a very poor condition. There are no kitchen or mess room facilities, shower or office space.
- 6.5 The River Kennet is identified as an Area of Biodiversity Interest. An Ecological Advice Note is therefore submitted in support of the application. None of the trees on the island are affected by the proposal.

The Proposed Development

- 6.6 The proposal constitutes erection of a replacement welfare building which will include a WC, shower, basic kitchen facilities, a mess room/office area and storage.
- 6.7 The building will be modular construction with flat roof. Floor area will be 6.2m x 3.5m with flat roof at 2.6m whilst proposed materials will be plastic coated steel for walls / fascia, steel doors and upvc windows.

Need for the Proposed Development

- 6.8 In March 2019, Ridge Consulting undertook a site condition survey of an array of lock facilities across Thames Area. As part of this, the lock keeper facilities at Blakes Lock were identified as needing improvement. The need for better welfare facilities at Blakes Lock is a high priority as the lock has now been allocated a full time lock keeper rather than relying on visiting lock keepers to manage the site. The site condition survey undertaken by Ridge identified the need for a new building providing new welfare facilities. The facilities required to ensure the health, safety and wellbeing of the lock keeper and relief staff include a WC, shower, basic kitchen facilities, a mess room/office area and storage

Planning Assessment

- 6.9 The proposed welfare building will replace a number of smaller, dilapidated buildings on site. There is a clear need for the welfare building to enable to Lock Keeper to undertake their role in a safe and effective manner.
- 6.10 The design and layout of the welfare building reflects its proposed use. The scale is modest and will not be unduly prominent in this location. The replacement building will enhance the character and appearance of this site whilst ensuring there is no harm to ecological interests within the river corridor. The replacement building will not result in loss of any trees on the island.

- 6.11 As such it is considered the building is appropriately designed with submitted drawings and supporting reports demonstrating how the proposal can be accommodated on the site and that there are no technical reasons preventing the proposal being developed.
- 6.12 In view of the above, it is considered the scheme satisfies national and local policy and represents a suitable and sustainable development proposal for the site that addresses all the relevant and material considerations. In this context, the proposal satisfies Section 38(6) of the Planning and Compulsory Purchase Act 2004 and it is considered that planning permission should be granted.