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Design and Access Statement incorporating Heritage, Biodiversity and Climate Change Assessments

Rev A

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Planning Application for erection of security fencing at the former Adult Education Centre, Holbrook Road Belper.

This Design and Access Statement is submitted in support of a Full Planning Application for the erection of security fencing to the inner face of the extant brick boundary walls at the former Adult Education Centre on Holbrook Road Belper.

Design and Access Statement

1.0 Context Appraisal

1.1 Assessment:- The building is located on the western side of Holbrook Road. The location steeply slopes which results in the building being quite prominent when viewed from the north and west but unobtrusive when viewed from the south and east.

The building has accommodation spread over 4 floors inclusive of a basement area (which is not included within this application). Due to the nature of the levels, there is pedestrian access afforded to both the 'ground' and 'first' floor levels.

The building is finished in dark brick and has large windows on all elevations. The roof is finished in dark plain tiles. The extant entrance corridor appears to have been added in the 1970's/80's and is out of character with the remainder of the building.

The building is surrounded to the east, north and west by the original brick boundary walls. In some areas (along Holbrook Road) there is evidence of previous fencing reaching above the height of the top of the boundary wall. The ground level when viewed from within the site is significantly lower than that when viewed externally from the public realm.

The building was constructed as a school and has operated in an educational capacity thoughts its entire existence. Planning permission was granted to convert the facility into a Class C2 Children's Home in 2019 (AVA/2019/0663) although this was never enacted, therefore it is considered that the previous use (D1-now F1) remains the current use. It is the intention of the applicant to once again use the building for an educational facility.

1.1 Relevant Planning Policies:-

Careful consideration has been taken of Amber Valley Borough Council's Adopted Local Plan (2022-2040) requirements and relevant Core Strategy Policies.

In addition, note has been taken of the Belper Heritage and Character Assessment (2016)

1.2 Involvement:-This is a private development but we are willing to hold discussions with other interested parties such as the statutory authorities, highways etc.

1.3 Evaluation – It is considered that the proposed alterations will have little impact on the appearance of the property and will allow the building to be brought back into a daily educational use whilst being secure and in accordance with current security considerations for places of education.

1.4 Design–No alterations are proposed to the external appearance or fabric of the boundary walls. The green metal fencing will be affixed to the inner face of the walls and will reach a height of 2.4m from the lower inner level. This will secure the site from access and egress other than via the designated pedestrian and vehicular access points.

2.0 Design Component

2.1 **Amount**:- Installation of 2.4m high security fencing to inner face of extant boundary walls

2.2 **Use**:-Class F1 Learning and Non-Residential Institution.
2.3 **Layout** – Defined by position of current boundary walls.
2.4 **Scale** – 2.4m high above internal ground level.
2.5 **Landscaping** – There are no landscaping matters relating to this application.
2.6 **Appearance** – It is considered that the alterations will be in keeping with the retained appearance of the building whilst making the facility secure from both without and within.

3.0 Access

3.1 **Physical links** – There are no issues relating to the location of the building relevant to this application.
3.2 **Inclusion** - There are no issues relating to inclusion relevant to this application.

4.0 Others

4.1 **Energy efficiency** – There are no issues relating to energy that are relevant to this application
4.2 **Crime prevention measures** – By definition, the installation of the security fencing will enhance the crime prevention considerations of the educational facility, bringing it in line with the majority of other educational facilities in the wider Belper area where security fencing is widely installed.
4.3 **Pollution and ecology** – There are no matters relating to pollution or ecology that are relevant to this application.

5.0 Listed Buildings

5.1 The property is not listed and does not lie within a Conservation area.

Heritage Statement:- Proposed INstallation of security fencing

Introduction:-

In order to comply with the provisions of the NPPF 2012 (Paragraph 128) applicants are required to provide a description of the significance of any heritage asset affected. The level of detail should be proportionate to the assets importance.

Legal and Policy Considerations:-

The proposed development must be considered in light of sections 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. In terms of the conservation area, the development must preserve or enhance the character or appearance of the area.

Identified Heritage Assets:-

A search of AVBC's website has highlighted that the property does not lie within a Conservation Area.

Relevant Heritage Assets (RHA):-

The host dwelling is situated across the road from a Grade two listed property (Zion Methodist Church, Holbrook Road, Listing NGR: SK3492746595) and this is considered to be the relevant heritage asset.

HOLBROOK ROAD 1. 5167 (South-Vest Side) Zion Methodist Church SK 3446 4/160 II 2. Late C18/early C19. Simple ashlar chapel with symmetric facade. Plinth and pedimental gable. Two storeys. Two windows, sashes with glazing bars ground floor, those of top floor now blocked and stuccoed over. Centre door with lintel and rectangular fanlight.

The Proposed Development:-

Planning permission is being sought to install security fencing to the inner face of the extant boundary walls as detailed with the Design and Access Statement.

Impact of the Development on the Heritage Assets:-

It is considered that the proposed addition to the boundary treatment of the former educational centre will enable the building to operate as an active building and part of the wider community again. The security fencing will not be permanent and could (in theory) be removed whilst leaving very little evidence of its installation, thus preserving the traditional appearance of the former playground areas.

Conclusion:-

It is considered that the proposal would not have a harmful impact on the Relevant Heritage Asset (adjacent property) and for the reasons set out above would not lead to a loss or deterioration of the area's appearance. As such the proposals would meet the test of the NPPF in safeguarding and enhancing the Area.

Appendix

Selected images showing the boundary wall from within the site





Biodiversity Assessment

It is noted that Local Plan Policy EN8 requires that:-

All development should:

> *1. protect, manage, enhance and extend the ecological network of habitats, species and sites of international, national and local importance (statutory and non-statutory),*
> *2. minimise impacts on biodiversity and features of geodiversity value,*
> *3. deliver measurable and proportionate net gains in biodiversity*

It is considered that as this application is for the erection of security fencing, that points 1 and 2 are negated as there is no ecological network or habitat that will be impacted by the proposed fencing and likewise, there will be no impact upon the biodiversity of the extant site.

It could be argued that the erection of the proposed fencing would also not require any site specific species enhancement measures as the proposal for the erection of security fencing does not require any traditional methods of construction or indeed any excavation works to surfaces that are not currently hard bound tarmac.

As part of this process, we have spoken with Derbyshire Wildlife Trust who have looked at the LPA's website to briefly assess the application and they expressed an opinion that they didn't consider that they would be consulted on this application and, if they were to be consulted that they would not be in a position to make recommendations as the nature of the project does not provide sufficient scope for species enhancement.

However, the applicant is happy to engage with The Derbyshire Wildlife Trust in positioning bird and/or bat boxes in positions on the main building located on the site that would provide some measure of species enhancement for the wider site.

There is no scope for planting as a result of the proposed fencing as the former playground area is hard bound as mentioned above.

Climate Change Assessment

It is noted that Local Plan Policy EN1 requires that:-

All development proposals will need to demonstrate how climate change issues have been considered through the submission of a climate change assessment in conjunction with a planning application.

However, no construction work is proposed in the pursuit of this security fencing. No excavation will be carried out and there will be no increase in the risk of surface water flooding or other identified climate change criteria.

The policy also states that:-

1.Unless it can be demonstrated that the nature of the proposed development precludes it, all development proposals will be required to maximise opportunities to reduce emissions and meet the Government's net zero target by

a) reducing embodied carbon through the reuse of the existing buildings and materials on the site, where possible,
b) demonstrating the use of sustainably sourced materials in construction,
c) using design and location to minimise travel distances and incorporate opportunities for sustainable modes of travel, such as walking and cycling,
d) reducing energy consumption through construction by having regard to landform, layout, building orientation, massing, landscaping and by following the Energy Hierarchy,
e) generating and using energy from renewable or decentralised energy sources - where this is not practical at the time of construction, proposals must demonstrate that the buildings are 'net zero ready' and able to incorporate renewable energy solutions in the future,
f) retaining existing trees and hedges wherever possible,
g) protecting and where possible enhancing land that acts as a carbon sink, such as woodland.

2. Unless it can be demonstrated that the nature of the proposed development precludes it, all development proposals will be required to incorporate measures to help to mitigate and adapt to the impacts of climate change and to take the opportunity to provide gains for nature, and the health and wellbeing of residents.
The following will be sought where appropriate:
a) the provision of multi-functional green infrastructure, with climate change mitigations such as street trees and hedges for shading and rain gardens for surface water drainage,
b) water management solutions such as including natural flood management, green roofs and grey water recycling, and adherence to the Drainage Hierarchy, and to ensure the use of Sustainable Drainage Scheme (SuDS) wherever practical,
c) measures to reduce surface water and other types of flood risk to the site and beyond and taking the opportunities to improve water quality wherever practical,
d) measures to avoid overheating including through orientation and design

It is strongly argued that as the application is purely for security fencing to be added to the extant boundary brick walls, that the request for and of the items listed in 1 and 2 above would be considered to be disproportionate. Indeed it is considered that by bringing the host building back into use, that the ideals of 1a are met.

There is no nationally available Climate Change Assessment template that is currently available and, it is considered that the production of such an assessment would be a disproportionate cost for the applicant given the nature of the application being the erection of security fencing to the extant site.

HMG's Office for Budget Responsibility identifies the UK's Climate Change Risk Assessment comprising 6 identified sectors:-

- Risks to communities, businesses and infrastructure from flooding and coastal change.
- Risks to health, well-being and productivity from high temperatures
- Risks of shortages in the public water supply, and for agriculture, energy generation and industry
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soil and biodiversity
- Risks to domestic and international food production and trade
- Risks from new pests and diseases and from invasive non-native species

July 2019. Box 9.1. Page 241.

Given the nature of the application for the erection of security fencing with no associated construction or development works, it is argued that none of the above identified 'risks' are relevant to the application currently put forward for consideration by the LPA.