

**ROYAL BOROUGH OF WINDSOR & MAIDENHEAD
PLANNING COMMITTEE**

BOROUGHWIDE PLANNING PANEL

22 August 2017

Item: 1

Application No.:	16/03115/OUT
Location:	Heatherwood Hospital London Road Ascot SL5 8AA
Proposal:	Hybrid planning application comprising: 1) Application for full planning permission for the development of a new Elective Care Hospital and associated Admin Hub with associated parking, vehicle access, highway works, plant and landscaping 2) Application for full planning permission for the change of use of existing building to provide GP Practice, Office, Data Centre and Staff Restaurant in association with the Elective Care Hospital 3) Application for outline planning permission (access and layout determined with all other matters reserved for future consideration) for demolition of existing hospital and redevelopment of up to 250 dwellings with associated vehicle access and highway works 4) Application for full planning permission for the change of use of existing woodland to Suitable Alternative Natural Greenspace (SANG) in association with the outline residential planning permission.
Applicant:	Frimley Health NHS Foundation Trust
Agent:	Mr James Lacey
Parish/Ward:	Sunninghill And Ascot Parish/Ascot And Cheapside Ward
If you have a question about this report, please contact: Jenifer Jackson on 01628 796042 or at jenifer.jackson@rbwm.gov.uk	

1 SUMMARY

- 1.1 The Frimley Park Hospital NHS Foundation Trust (FHFT) has applied for permission to redevelop their site at Ascot, to provide a new hospital within the existing woodland to the south of the existing Heatherwood Hospital, retaining Block 40 for use as an administrative hub and to redevelop the remaining existing hospital site for residential as enabling development to help fund the initiative. The retained woodland would become SANG.
- 1.2 This is a hybrid planning application comprising of the following elements
- i Application for full planning permission for the development of a new Elective Care Hospital with associated parking, vehicle access, highway works, planting and landscaping on the woodland site;
 - ii Application for full planning permission for the change of use of existing building Block 40 to provide GP facilities and office facilities for the Trust;
 - iii Application for outline planning permission for demolition of existing hospital and redevelopment of up to 230 dwellings with associated vehicle access and highway works;
 - iv Application for full planning permission for the change of use of retained woodland to Suitable Alternative Natural Greenspace (SANG) in association with the outline residential planning application. planning application comprising:
- 1.3 The existing Heatherwood Hospital is on the western edge of the town of Ascot in East Berkshire, bounded to the north by Ascot High Street, A329 and to the Northwest by Kings Ride, A322. The existing Hospital buildings are sited to the north of land within the Frimley Health NHS Foundation Trust ownership. The southern half of the 18 ha site comprises a steeply sloping woodland area, bounded to the south by the main railway line between Reading and London Waterloo.
- 1.4 The entire site is located within the Green Belt. The proposed hospital development will result in the removal of a significant portion of the woodland priority habitat (3.66ha of 9.33ha or 38.6%) and existing trees. The area of woodland replanted / restored is 0.98 ha. The net loss of woodland is therefore 2.78 ha or just under 30% of the total.

- 1.5 The principle of a 'very special circumstances' case for developing a replacement hospital on the previously undeveloped part of the Green Belt site, allowing continuity of and ultimately improved health service provision, and release of the existing built on site for housing as enabling development can be considered, in accordance with NPPF and local policy. Very special circumstances will not exist however unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 1.6 The application has been amended to remove an office building from the woodland site but not the majority of its associated parking. This office use now to be located at Block 40 serves the Trust's operations, the majority of which are carried out elsewhere, primarily on the Frimley and Wexham sites. Furthermore the car parking proposed is significantly in excess of the Councils adopted parking standards. The key concern relates to the loss of woodland priority habitat as a result of the parking proposals. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused (NPPF 118).
- 1.7 The extent of parking resulting in the significant loss of woodland priority habitat is not justified. The proposed improvements to the retained woodland do not offer anything significantly over and above that which the applicants are already obliged to ensure under an existing Planning Agreement and are not considered sufficient mitigation or compensation for the net loss of woodland and harm caused. A Very Special Circumstances Case does not therefore exist and the proposals are contrary to Green Belt policy and represent unsustainable development.
- 1.8 Archaeological assets relating to the Soldier's Pillar monument have been identified on the site following archaeological investigations. These are of significance and should be preserved on site, if reasonably possible, as an open space linked to the existing well-preserved barrow close by which is a Scheduled Ancient Monument. The residential layout proposed is fixed under this outline application, it includes building over the heritage asset and the applicant has declined to amend the layout and has also declined to leave siting for Reserved Matters determination whereby this issue could be given further consideration. The proposals therefore do not adequately safeguard archaeology.

It is recommended the Panel refuses planning permission for the following summarised reasons (the full reasons are identified in Section 11 of this report):

1	The proposals overall are inappropriate development which is by definition harmful to the Green Belt and result in harm to openness. The parking proposals in particular result in harm through the loss of a significant area of woodland priority habitat. Very Special Circumstances do not exist, because of the harm to the Green Belt and other harm that is considered avoidable and which is not clearly outweighed by other considerations.
2	The proposal would have an adverse impact on priority woodland habitat. It has not been demonstrated that the proposed development has adequately avoided, mitigated or compensated the harm.
3	The proposal would result in the loss of trees, which are considered important landscape features and are covered by a Tree Preservation Order. Their loss would be harmful to the character and appearance of the area.
4	The residential layout proposed would be detrimental to heritage assets of importance as it includes building over the Soldiers Pillar, which should be preserved, if reasonably possible, on site as an open space linked to the existing well-preserved barrow, which is a Scheduled Ancient Monument.

2 REASON FOR PANEL DETERMINATION

The significant nature of the proposed development, it's Borough wide and beyond Borough implications in terms of healthcare provision warrant consideration and determination by the Borough Wide Planning Panel.

DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

- 2.1 The site comprises the existing Heatherwood Hospital and the woodland to the south, land within the Frimley Health NHS Foundation Trust ownership. It is on the western edge of the town of Ascot in East Berkshire, bounded to the north by Ascot High Street, A329 and to the Northwest by Kings Ride, A322. The south of the site is bound by the South West trains railway line. The western boundary of the site consists of deciduous woodland with some individual large residential properties / developments. Adjacent to the eastern boundary of the site are stables associated with Ascot racecourse as well as the Thames Valley Police and Ascot Police Station.
- 2.2 Private apartments and key worker / nurse residential accommodation is constructed on land outside the Trust's ownership, along Brooke Avenue between the existing Hospital and the woodland to the eastern side of the site.
These properties are excluded from the application site.
- 2.3 There are three accesses into the site from Kings Ride and London Road. Ascot racecourse is approximately 270m to the east of the northern boundary of the site. The centre of Ascot is less than 1.3 km from the site. Ascot railway station is situated approximately 1.3km from Heatherwood Hospital. Key destinations from the station include London Waterloo, Reading and Guildford with between two and four trains per destinations per hour.
- 2.4 The existing Hospital buildings are sited to the north of the site. The site has been extensively developed over time. The original 1920s hospital buildings are predominantly single storey whilst later additions such as the 1960s main building in the northeast corner of the site are 4 storeys. The existing hospital Block 40 building is part 1 and part 2 storeys. The site also contains large expanses of hard standing, providing 469 formal car parking spaces.
- 2.5 The southern half of the site comprises a steeply sloping woodland area, bounded to the south by the main railway line between Reading and London Waterloo.
- 2.6 The entire 18 ha site is located within the Green Belt. The settlement of Ascot sits to the east of the application site.
- 2.7 A designated Scheduled Ancient Monument (SAM) 'Bell Barrow on Bowledge Hill' is located within the existing hospital site. The SAM is a round barrow, a funerary monument, which often date back to the Early and Middle Bronze Age, with most examples belonging to the period 1100-1500 BC.
- 2.8 The closest designated site is a SSSI, Englemere Pond, located approximately 420m to the west of the site. This SSSI comprises open water in the form of a large pond that is surrounded by a wide fringe of reed swamp. The site is within 5km of the Thames Basin Heaths Special Protection Area (SPA), a European designated site subject to the protection of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations). The SPA comprises open heathland habitats, scrub, woodland, mire and bogs. The site supports important breeding populations of a number of birds of lowland heathland which nest on the ground and in gorse.
- 2.9 The site is located within Flood Zone 1 with a low probability of flooding

3 BACKGROUND INFORMATION

Frimley Park Hospital NHS Foundation Trust (FHFT)

- 3.1 The Heatherwood Hospital is one of three main sites within the Frimley Park Hospital NHS Foundation Trust (FHFT), created in 2014 by merging Frimley Health NHS Foundation Trust and Heatherwood and Wexham Park NHS Foundation Trust. FHFT provides NHS hospital services for around 900,000 people across Berkshire, Hampshire, Surrey and south Buckinghamshire. The new Trust delivers a wide range of healthcare services from the three main sites: Wexham Park Hospital in Slough, Frimley Park in Frimley and Heatherwood; as well as running outpatient and diagnostic services from Aldershot, Farnham, Fleet, Windsor, Maidenhead, Bracknell and Chalfont St. Peter.

- 3.2 Heatherwood Hospital was built in the 1920s for children of ex-servicemen from the 1914-18 war suffering from TB. It was designed with open corridors and “Victorian” style wards that remain today. Whilst adaptations have been made since then, it is argued by the Trust that the needs of modern health requirements cannot be met by the limitations of the building layout and the provision of a new purpose built, single integrated facility on the site would enable significant improvement to clinical quality compared to providing additional piecemeal facilities on both the Wexham Park and Frimley Park sites.
- 3.3 The Trust wishes to retain clinical services in a ‘central site’ (i.e. between Frimley and Wexham Park) to allow for better vertical integration into community and primary care. In addition the presence of a joint facility located mid-way between the two main hospital sites will act as a physical link between the two therefore facilitating integration of the two trusts.
- 3.4 The Trust advises that patient demand and travel patterns indicate that there is a sizeable population that chooses to travel to the Heatherwood site for treatment. Maintaining a facility here meets this need. If it were to close it would be possible to re-provision services across the Wexham Park and Frimley Park sites, however Frimley Park is currently operating close to capacity and there are limited opportunities to add additional facilities to the site in order to manage increased demand. There is also a risk that some patients would choose to travel to other neighbouring Trusts thereby reducing the post-acquisition Trust’s market share and increasing the financial risk of the transaction.
- 3.5 The Trust’s vision is to keep the elements that work well such as a supportive community, committed staff and move them to a new facility that can help them deliver high quality healthcare on the same site. Heatherwood Hospital’s future is envisaged as a planned care centre, leaving the emergency care to take place at Wexham Park to the north and Frimley Park to the south. This will offer many benefits to the local population: -
- More 24/7 care on the Heatherwood site will increase the choice of the local community including a new private patients facility for the first time.
 - By separating and relocating emergency work on a different site planned care can be ring fenced with less cancellations of operations.
 - Increasing the workload at Heatherwood will ease the pressures on the extremely busy and constrained sites at Wexham and Frimley
 - A primary care hub is planned adjacent to the hospital bringing together several local GP surgeries under one roof.

Planning application amendments

- 3.6 The planning application was originally made in December 2016. In summary it comprised a new replacement hospital building and an office building in the woodland to the south of the existing hospital site, the release for housing as enabling development of the current hospital site, and use of the retained woodland as ‘suitable alternative natural green space’ (SANG) in association with the new residential. On the 25th January 2017 the applicant was advised in writing of officers’ preliminary assessment of the applications and invited to consider amendments in order to overcome significant concerns, principally relating to being able to justify locating the office building within the previously undeveloped woodland site in the context of Green Belt planning policy. The Environmental Statement submitted was also found to be incomplete and a formal request under Regulation 22 of the EIA Regulations was issued on the 7th February 2017, requesting additional environmental information.
- 3.7 The application was formally amended through a submission made in late April 2017. Additional information and an addendum to the Environmental Statement have also been received in response to a Regulation 22 Notice served on the applicant. The application as amended is considered in this report.
- 3.8 The principal amendment comprises the removal of the office building. This use is to be provided in the existing hospital building, Block 40. Originally the existing Block 40 was to provide office and GP facilities on an interim basis, which would have been relocated to the new building allowing release of the site for an additional 20 houses, but Block 40 will now be retained permanently and the overall

housing will reduce from 250 to 230. Parking for the Block 40 office and GP use is split, 45 vehicles to be located at the building's main entrance and the balance of 55 of the 100 spaces, located as part of the new hospital car park in the undeveloped woodland site.

- 3.9 The reduction in woodland site allocated to the development as a result of the amendment is approximately 0.47ha i.e. the site area reduces from 4.13 to 3.66 ha, accounting for 38.6% of the woodland site. The area of woodland replanted / restored reduces from 1.35 to 0.98 ha. The net loss of woodland is therefore 2.78 ha or just under 30% of the total. The reduction in the number of dwellings (230 down from 250) would allow a reciprocal reduction in the area of SANG provision, however, the opportunity has been taken to increase the SANG area to 6.17 ha. It is noted that the surplus would have the capacity to serve approximately 90 additional dwellings.
- 3.10 Along with the reduction of the site area to the north and east of the new hospital the site plateau has been lowered by 1.3m and the overall building height has been reduced by 0.6m. In addition 950 sq m of bio-diverse green roof have been included as part of the hospital development.

4 DESCRIPTION OF THE PROPOSAL AND RELEVANT PLANNING HISTORY

Planning History

- 4.1 There are a number of applications which have been submitted in previous years in relation to Heatherwood Hospital for both medical and residential purposes. The notable applications are summarized in the table below.

Ref	Description	Decision and date
003/2017	TPO served to protect all the Woodland trees.	Served 13/02/2017
09/00390/FULL	Consent for two modular buildings for use with the Hospital facilities	Permitted 03/03/2009
08/02283/FULL	Revised siting of Block C5 (18 studio key worker units) retrospective amendment	Permitted 22/09/2008
06/00147/CPU	Use of Heatherwood House as 14 flats rather than present 18 flats through internal works	Permitted 23/01/2006
04/00708/FULL	Construction of 20x 3-bed terraced houses in 4 blocks and 108 keyworker bedsits in 6 blocks plus associated access, parking and landscaping following demolition of 2 existing buildings and part of Heatherwood House	Permitted 27/08/2004
04/84861/FULL	Erection of a single storey extension and alteration to existing X ray building	Permitted 17/02/2004
04/84826/TEMP	Temporary consent to site four mobile units for doctor's surgeries	Permitted 09/02/2004
03/84379/COU	Convert entrance lobby to include new café and retail unit	Permitted 09/10/2003

03/84333/FULL	Erection of a single storey extension and alterations to existing X-ray building	Permitted 23/09/2003
02/82877/TEMP	Erection of a twenty six bed ward for a temporary period of 5 years	Permitted 30/09/2002
92/00028/FULL	Erection of a new two storey building on land adjacent to the Red Cross	Permitted 10/05/1993
91/00032/FULL	Erection of a single storey building to provide a 14-bed day surgery ward	Permitted 24/10/1991

- 4.2 An EIA Scoping Opinion was sought in September 2016 for development: 1) Replacement hospital, office building including GP surgery, parking, associated development, future expansion area and access to Ascot Railway Station; 2) Suitable Alternative Natural Green Space; and 3) Residential development. Reference 16/20040/CNSULT dated 29.9.2016.

Concurrent related applications

- 4.3 There is a concurrent application in respect of the existing hospital building, Block 40 (Planning reference 16/03824/FUL) for: Change of use from hospital accommodation (Use Class D1) to offices with associated IT hub and staff restaurant (Use Class B1a) and GP Practice (Use Class D1) with associated parking, landscaping, replacement roof top plant, external staircase, temporary car park and demolition of existing walkway.
- 4.4 There is a concurrent application for enabling works (Planning reference 16/03825/FULL) for: Enabling works in association with hybrid application (ref: 16/03115/Out) and change of use application (ref: 16/03824/Full) for the redevelopment of Heatherwood Hospital. Enabling works to be site clearance, drainage diversions, services diversions, earthworks, construction of retaining walls, advanced planting and creation of balancing pond.
- 4.5 Both of these applications are subject to reports included within the Panel agenda.

Proposed Development

This is a hybrid planning application comprising:

I Application for full planning permission for the development of a new Elective Care Hospital and associated parking, vehicle access, highway works, plant and landscaping.

ii Application for full planning permission for the change of use of existing building Block 40 to provide GP Practice, Office, Data Centre and Staff Restaurant in association with the elective care hospital. Provision of associated parking.

iii Application for outline planning permission (access and layout determined with all other matters reserved for future consideration) for demolition of existing hospital (apart from Block 40) and redevelopment of up to 230 dwellings with associated vehicle access and highway works

iv Application for full planning permission for the change of use of remaining undeveloped woodland to Suitable Alternative Natural Green space (SANG) in association with the outline residential planning permission.

Quantum of development

- 4.6 The amount of development is set out in the table below.

Use	Maximum floorspace (Gross External Area) / numbers
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Hospital (Use Class D1)	11,065sqm
GP (Use ClassD1)	700sqm
Offices (Use Class B1a)	3,800 sqm
Car parking (non residential)	450 spaces with 23 disabled spaces. 27 motorcycle spaces
Cycle parking (non residential)	132 spaces, caters for: 20 visitors and 64 staff associated with the Hospital and 48 staff/GPs associated with the Administration Hub/GP Unit.
Residential (Use Class C3)	230 units
Car parking residential	<i>Indicative as subject to Reserved Matters application</i> 525 spaces, includes 64 unallocated visitor spaces
Cycle parking (residential)	<i>Indicative as subject to Reserved Matters application</i> 230
SANG	6.17ha

Masterplan context and phasing

- 4.7 The developments proposed sit within a masterplan context for the entire site. The masterplan, its evolution and the principles underlying it are set out in the supporting Design and Access Statement. The characteristics of the masterplan in summary are:
- i. The new Hospital is located within the existing woodland on a site of 3.66 ha and takes advantage of the woodland setting, and distant views to surrounding countryside.
 - ii. The existing hospital site of 6.52 ha is released for new residential development, apart from Block 40.
 - iii. New residential blocks of flats address the High Street and Kings Ride site frontage.
 - iv. The existing gateways into the site are enhanced, primary and secondary residential road access provided, a route for the Hospital traffic provided and dedicated routes for pedestrians through the residential development's green spaces to the Hospital and the Woodland.
 - v. Lower rise residential development is grouped around the central green space including the Scheduled Ancient Monument and the taller apartment blocks placed along the High Street and Kings Ride frontage.
 - vi. The existing hospital block 40 Building is retained in Health Trust occupation and converted to administrative offices and GP surgery.
 - vii. The remaining Woodland site of 6.17 ha is developed as Suitable Alternative Natural Green Space (SANG).
- 4.8 The masterplan is to be implemented on a phased basis which is summarized as follows:
- i. Phase 1 - Change of use of existing hospital block 40 to administrative hub; and GP surgery.
 - ii. Phase 1A - Advance works for the New Hospital development include improvements to the visibility splay at the site entrance from Kings Ride, removal of trees within the construction site of the New Hospital and new infrastructure services works and road alignment.
 - iii. Phase 1B - Construction work on the New Hospital including the external works, car parking roads and the external lift block which provides the accessible route for pedestrians, wheelchair users, mobility scooters, between the wider site, the Woodlands Office (Block 40) and the New Hospital
 - iv. Phase 2 - New Hospital is complete and all services are decanted into the new accommodation, then the former hospital buildings are vacated, demolished and the site cleared for the first phase of the residential development. Parking adjacent to the existing residences rationalised. Parking for woodlands office (Block 40) staff moves to the new car park adjacent to the new hospital
 - v. Phase 3 – SANG implemented

More detailed description of application proposals

- 4.9 The more detailed description of the proposals are as follows:

1) Full planning permission for hospital

- 4.10 The new purpose-built elective case hospital is arranged over 4 levels, totaling 11,065sqm. The following clinical departments are contained within Heatherwood Hospital:
- 4.11 The site is to the south of the existing hospital and access to the hospital will be through the new main access road to the west of the site which is to be served by a new roundabout on Kings Ride (A332) providing direct access to the hospital facilities. To the south of the site there is a dedicated route for deliveries and waste collection separated from staff and public circulation.
- 4.12 The site is steeply sloping and in order to create the levels required for the buildings and service roads, the development involves a large cut and fill exercise. Two plateau levels are provided with access points at two levels and separate traffic (goods in/ waste out at lower level 0) from the public and staff access points (on higher level 1). The lower floors of the hospital offer patient arrival and treatment facilities. The top floor of the Hospital includes inpatient beds which have been arranged to maximise outward facing views of the surrounding landscape and woodland.
- 4.13 Two car parks are located adjacent to the hospital main entrance, providing a total of 405 (413 shown on plan) spaces with 23 disabled spaces. Car park 1 to the west of the hospital building provides 173 car spaces and 12 motorcycle for patients and visitors mainly; Car park 2 provides 240 car spaces and 15 motorcycle spaces for hospital staff and office staff based at Block 40.
- 4.14 A large service yard is provided to the eastern side of the hospital building at a lower level. A service road is proposed to provide access for delivery / maintenance vehicles. The road is routed along the southern boundary of the site, with parking provisions for 3 goods/food vehicles, 2 waste vehicles and 2 vans. Access to the service yard from the building is at ground level, screening is provided to the service yard area from the main approach road and entrance area.
- 4.15 A large balancing pond is proposed located south of the main hospital building, within a clearing in the existing woodland / proposed SANG. It is triangular in shape and occupies approximately 0.4 ha. The balancing pond is designed to replace the original attenuation tank, and will manage the water run-off from the sites to the north. It is envisaged that this area would be an ecologically diverse, dynamic landscape, with terraced access down to water level, along the northern edge.

Design and appearance

- 4.16 The hospital building will be 3 storeys high, plus fully enclosed rooftop plant, when viewed from the upper plateau (Level 01), with a further “half” storey at the lower plateau level (Level 00). The design and appearance of the building is characterized by:
- Ground levels L0 and L1 - a brick / masonry plinth embedded in the site, which is single storey when viewed from the upper level plateau (L1), and two storeys when viewed from the woodland (L0).
 - First floor level L2 - a metallic clad interlayer (theatres), the reflective materiality is intended to render this layer visually recessive when viewed between the solidity of the base and lighter feel of the upper L3 volume.
 - Second floor level L3 - a timber clad, notional tree house, where the patient bedrooms are located, appears to float above the solid plinth, an impression created by its cantilevered volume.
 - Roof plant L4 – metal louvered cladding.

Landscape and trees

- 4.17 The landscape proposals for the hospital comprise:
- an avenue of trees and shrub understory which extends from Kings Ride along the hospital's westernmost boundary
 - woodland edge buffer / screen planting to the north and west of the proposed buildings
 - woodland edge planting surrounding the buildings and associated car parks
 - public realm sensory / textural planting along the pedestrian access to the hospital, between the buildings and within the hospital courtyard
 - tree and shrub planting within the car parks

- wetland planting in the vicinity of the proposed balancing pond within the retained woodland / SANG area

4.18 The landscape strategy underpinning the proposals is described in the accompanying Design and Access Statement. The strategy comprises a design concept "Life in an Arboretum", for providing a high quality public realm with the following 4 characteristics:

- 1) Ascot Arboretum - introduction of a diverse range of tree species contributing to the overall site arboretum collection
- 2) The Healing Landscape - the hospital is nestled within a woodland & contains a series of sensory landscapes, combining to form an environment conducive to healing & rehabilitation
- 3) Ecological Woodland - hospital is set within the existing woodland & adjacent to the SANGS, encouraging passive/active engagement by users
- 4) A Place for Children & Young People - a stimulating & playful natural environment offering opportunities to engage with nature

4.19 The proposed woodland planting surrounding the hospital is intended to interconnect with the site wide planting strategy, compliment the restoration/development of the existing woodland (SANG) and mitigate the removal of existing trees. The variation in existing site levels is absorbed by proposed embankments colonised with belts of woodland tree species and associated woodland understory species. These zones extend as fingers of the existing woodland to connect with green infrastructure links throughout the site, providing screening of proposed buildings from neighbouring residences and forming ecological habitats. The inclusion of arboretum specimens within these edges is intended to add a visual richness and increase of biodiversity.

4.20 Structural planting is provided to define the main vehicular/cycle access route along the western boundary, running north to south, creating an avenue approach leading to the hospital. A series of courtyards provide sensory and visually stimulating, therapeutic environments to be enjoyed by all users. Located south of the main hospital building, within a clearing in the existing woodland/SANG, the balancing pond is designed to replace the original attenuation tank, and to manage the site water run-off. A terraced access is shown down to water level, along the northern edge. The remaining embankments are planted with marginal aquatic planting, merging into the grassland within the woodland clearing.

4.21 The existing woodland is characterised by predominantly broadleaved species, with several feature trees. Locating the hospital development within the existing woodland will result in the removal of a significant section of the existing trees, including a Class A Wellingtonia and groups of Class B/Class C trees. The proposed new areas of woodland trees are designed to interconnect with the proposed SANG, to enclose the proposed hospital buildings and screen the development from the adjacent residences. The inclusion of feature trees, associated with the site wide arboretum, within the woodland planting scheme is intended to enrich the development's visual amenity value, increase seasonal interest and reference the site's hospital garden history.

2) Full planning permission for change of use of existing Block 40

4.22 The change of use will comprise refurbishment works both internally and externally to bring the building up to modern requirements. There will be no changes to the existing footprint of the building and therefore there will be no changes to the size, mass or scale of the existing building.

4.23 The building will provide a number of functions including a GP practice, a data centre, offices in association with the Frimley NHS Trust's administration and a staff restaurant. The office facilities will not only be administration facilities for Heatherwood Hospital, but also for the Trust as a whole, providing a more flexible workspace for employees within the overall Frimley Health NHS FT. This is a part of the Trust's strategy to ease existing pressures and make more space available for clinical services at Frimley Park Hospital.

4.24 The 4,500m² building is split over two levels, due to the contours both have at grade entrances and are predominantly single storey. There is a small central section where the floors overlap to create a two-storey element. In two locations there are roof plant rooms, which take the total height of the building in one location to three storeys. Built in the 1980s the building is red brick with large punched windows with an orange coloured frame surround. There is a flat roof topped with ballast

surrounded with a steel safety balustrade. Other than the addition of some high level vents at the lower level for the kitchen equipment there will be no material changes to the building façade.

- 4.25 The existing routes and pathways will be kept and upgraded where necessary. Once the new hospital is completed there will be a designated accessible route between the two with the construction of a new public lift – suitable for pedestrians, wheelchairs, mobility scooters and transporting physical files between the hospital and the admin offices. This route will also allow easy access to the public transport – bus stops – which will be routed to stops adjacent to the hospital entrance.
- 4.26 Staff and visitor parking is provided adjacent to the building in a “dead end” parking arrangement. The 45 parking spaces are located to the north and west of the building’s main entrance, off the drop-off zone. The balance of 55 of the 100 spaces serving the building, are located as part of the new hospital car park in the undeveloped woodland site. In the interim, pending completion of the redeveloped hospital and external works including car parking, there will be additional parking spaces created on the existing hospital site in the vicinity of Gate 1.
- 4.27 Vehicle access to the building will be via the existing access road from the A332 Kings Ride. The road alignment will be adjusted and a new access road to the building will be developed with a designated turning circle positioned at the upper level entrance once the external boiler house is removed. This road will also have a combination of DDA compliant accessible bays and regular parking spaces. Local resident’s access routes will be maintained.
- 4.28 Pedestrian access to the building will be via the existing footpaths leading from the A332 Kings Ride and the High Street. The existing hospital will remain open until the redeveloped hospital is operational, so there is also access through the existing hospital site. Designated pedestrian routes will run to both levels of the building, providing separate access for the GP practice and for the Trust staff to the office and restaurant.
- 4.29 Block 40 has 5 courtyards three of which are enclosed on four sides. There is also an external area which will form an extension of the restaurant and provide outdoor seating, eating and social areas. Landscaping is proposed for these spaces.

3) Outline application for redevelopment of up to 230 dwellings

- 4.30 The outline element of the scheme comprises the demolition of the existing hospital buildings with the exception of Block 40, and the redevelopment of the remaining site of approximately 6 ha to provide up to 230 dwellings with access, land use and siting of development plots, and scale / heights for determination and all other matters including detailed design and appearance and landscaping reserved for future Reserved Matters application/s.
- 4.31 An illustrative masterplan has been provided to support the outline proposals. The illustrative masterplan is in the form of two street grids, one orthogonal to the High Street and the other orthogonal to Kings Ride and which merge at a triangular shaped open space centred on the Bowledge Hill round barrow, a Scheduled Ancient Monument.
- i. There is an approximate 60:40 split of houses and flats and a range of dwellings sizes and types
 - ii. Blocks of flats up to 5 storeys address the High Street and Kings Ride site frontage.
 - iii. Lower rise development, shown as houses laid out in a street grid and grouped around the central green space including the Bowledge Hill round barrow.
- 4.32 Access to the residential development will be from two existing vehicular access points from the High Street (A329), which will be improved to allow access from both sides of the carriageway. Access from the east of the site is provided from the hospital access road and utilises the existing woodland offices access road to the south.
- 4.33 The vehicle circulation is by means of two unconnected loops corresponding to the two street grids as described above (5.32). Loop 1: The proposed vehicle access is provided by way of retained existing hospital entrances to the north, from the High Street. Proposed pedestrian access accompanies each vehicle access point with dedicated footpaths located on each side of the

carriageway. A further 3 secondary footpath only access points are proposed connecting the site to Kings Ride. Loop 2: Vehicle access is also provided from Kings Ride via the existing access road at the western edge of the site and connecting to Brooke Avenue, where there are three accesses to the proposed residential street network. Secure Gated access is proposed to link Brook Avenue to the new development.

- 4.34 The proposed siting provides development plots and open space defined by the street grid. There are five plots for apartment blocks, 4 fronting the High Street and the fifth located at the western edge of the site with its lesser frontage to Kings Ride. There are 8 plots for lower rise housing parcels.
- 4.35 Two principle areas of open spaces are provided, situated around existing features. The Ancient Scheduled Bell Barrow Monument becomes the focal of the development. Secondary open spaces are proposed around good quality trees, adjacent to the existing Brook Avenue housing towards the south east of the development, another smaller space at the Block 40 turning circle / hammerhead. Green buffer private open space is shown along the High Street frontage.
- 4.36 The Design and Access Statement includes a landscape strategy for the residential development. The residential landscape strategy reflects the site wide design concept of adopting an “Arboretum Approach”, forming a landscape characterised and identified by its rich and varied collection of tree species. It is stated that where appropriate, existing groups of trees and several key specimens, such as a Wellingtonia, are retained. ‘To enhance these existing features, a diverse range of key trees species are applied to introduce structure and spatial hierarchy: avenues define key access routes; pairs of trees at junctions form “gateposts”, creating a sense of entrance; individual specimens positioned at key nodes act as focal points, enhancing legibility; naturalistic groups of trees soften boundaries, enclosing residential areas.’ The landscape details would be subject to Reserved Matters approval.

4) Full planning permission for change of use of woodland to Suitable Alternative Natural Green space (SANG)

- 4.37 It is proposed to change the use of the remaining woodland to the south part of the site to SANG. This relates to the residential development and is to be provided in line with the regional and local planning policy to ensure the proposal will not have an adverse impact on the Thames Basin Heaths Special Protection Area. The SANG will measure 6.17 ha and include a 2.5 km circular walk around the woodland. The proposal also includes new planting and landscaping, new footpaths through the woodland and way marking and information boards.
- 4.38 A large balancing pond is proposed located within the proposed SANG to the south of the proposed main hospital building, within a clearing in the retained existing woodland. The triangular shaped pond occupies approximately 0.4 ha. It is envisaged that this area would be an ecologically diverse, dynamic landscape, with terraced access down to water level, along the northern edge, to allow for safe interaction with aquatic life. The remaining embankments would be planted with marginal aquatic planting, merging into the grassland within the woodland clearing. It is stated that a water body of such a scale would attract a diverse range of wild fauna, enlivening the SANG.
- 4.39 The proposed development is for up to 230 dwellings, this requires 4.38 ha of SANG (requirement is for 8ha/1000 – using 2.38 average occupancy). Therefore, the SANG provides a surplus of 1.79 ha, which provides capacity for an additional 223 people (94 dwellings).
- 4.40 A landscape and ecological management plan (LEMP) has been submitted in support of the SANG proposal. The aims set out within the LEMP are to:
- i. Provide sufficient information to demonstrate that the development proposal will not have an adverse impact on the Thames Basin Heaths Special Protection Area through the provision of Suitable Alternative Natural Green space (SANG);
 - ii. Outline the design of the proposed SANG and demonstrate that the provision meets Natural England’s SANG criteria;
 - iii. Provide management objectives to demonstrate that the SANG can be sustainably managed in perpetuity;

- iv. Provide details on the status of the current woodland and provide more detailed management recommendations to ensure the woodland functions as SANG;
- v. Set out capital and revenue costs associated with the SANG.

4.41 The LEMP provides details addressing the stated aims and sets out woodland management and ecology objectives, management prescriptions or considerations for more detailed survey and design of hard and soft landscaping. The woodland management plan will be used to assess the need for additional surveys for protected species, focusing on bats, badgers and birds. New planting of native species will be implemented in line with the management plan and will include selective planting to replace rhododendron and sycamore, screen planting at site boundaries, and planting of the proposed dense copses. Post SANG creation management principles are identified and a schedule of general of works and activities for the first 20 years after SANG creation.

4.42 It is stated that a formal review of the LEMP would take place after 5 years following the completion of construction, and then again at the end of each consecutive 5 year period. The revised LEMP would contain management prescriptions for a further 5 years and would be agreed with RWBM. If the results of post-creation monitoring highlighted the need for management changes, the Plan would be amended following agreement with the Council.

4.43 The woodland management plan and all landscape and ecological management will be undertaken by Frimley Health NHS Foundation Trust. It would be the responsibility of the Trust to review and update the LEMP at the end of the 5-year post-construction period.

5. MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

5.1 The main strategic planning considerations applying to the site and the associated policies are set out here.

National Planning Policy Framework (NPPF) 2012

5.2 At the heart of the NPPF is a presumption in favour of sustainable development. It sets out a set of core land-use planning principles to underpin both plan making and decision taking. These twelve principles are summarised:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.
- not simply be about scrutiny but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- take account of the different roles and character of different areas promoting the vitality of our main urban areas, protecting the Green Belts around them;
- support the transition to a low carbon future in a changing climate, and encourage the reuse of existing resources including conversion of existing buildings and encourage the use of renewable resources;
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land or development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage or food production);
- conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations;

- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable; and
- take account of and support local strategies to improve health, social and cultural wellbeing for all and deliver sufficient community and cultural facilities and services to meet local needs.

6.6 The NPPF relevant policy guidance references are listed below:

- Paragraph 14 Presumption in favour of sustainable development
- Paragraph 17 Core Planning Principles
- Paragraph 19 Supporting sustainable economic growth
- Paragraph 24 Sequential Test for Town Centre uses
- Paragraph 26 Office Impact Assessment for out of Town Centre uses
- Paragraph 29 Promoting sustainable transport
- Paragraph 32 Supporting transport assessment
- Paragraph 49 Housing to be considered in favour of sustainable development
- Paragraph 50 Delivering a wide choice of homes
- Paragraph 56 Design of built environment
- Paragraph 60 Decisions should not stifle innovation, originality or initiative
- Paragraph 61 Connection between people and places
- Paragraph 69 Creating healthy, inclusive communities
- Paragraph 70 Unnecessary loss of valued facilities and services
- Paragraph 80 Purposes of the Green Belt
- Paragraph 87 Green Belt development in very special circumstances
- Paragraph 88 Weight given to any harm in the Green Belt
- Paragraph 111 Reuse of brownfield land
- Paragraph 118 Aim to conserve and enhance biodiversity
- Paragraph 123 Impacts on health and quality of life
- Paragraph 125 Encouraging good design to limit impact of light pollution
- Paragraph 135 Non-designated heritage
- Paragraph 139 Non-designated heritage assets of archaeological interest
- Paragraph 188 Good quality pre-application discussions

Local Plan 1999 (incorporating amendments adopted in 2003)

5.3 The planning considerations applying to the site and the associated policies are:

Green Belt	Housing & Design	Open space and facilities	Heritage	Highways and Parking	Trees and Ecology
GB1, GB2, GB8 and GB9	H8, H10 & H11 DG1	R3, R4 & R5 CF1, CF2	ARCH 1, 2, 3 & 4	P4, T5 & T8	N6 N9

These policies can be found at

https://www3.rbwm.gov.uk/downloads/download/154/local_plan_documents_and_appendices

Borough Local Plan 2016 Submission version

5.4 The Royal Borough Local Plan submission version was published for consultation in June 2017 with consultation running between 30 June and 27 August 2017. It has only limited weight. The Heatherwood Hospital site has been allocated under Policy HA23 for approximately 250 homes in addition to retained health use. The allocation only incorporates the brownfield element of the site with the woodland falling outside the allocation.

Neighbourhood Plan 2014

- NP/EN1 Gaps between villages
- NP/EN2 Trees

NP/EN3	Gardens
NP/EN4	Biodiversity
NP/EN5	Green corridors
NP/H1	Development Briefs
NP/H2	Mix of housing types
NP/DG1	Respecting the Townscape
NP/DG2	Density, footprint, separation, scale, bulk
NP/DG3	Good quality design
NP/DG4	Heritage assets
NP/DG5	Energy efficiency and sustainability
NP/T1	Parking and Access
NP/T2	Cycle routes
NP/SS4	Heatherwood site

5.5 Supplementary planning documents adopted by the Council relevant to the proposal are:

- Thames Basin Heath Special Protection Area SPD 2010
- Planning Obligations and Developer Contributions 2014
- Affordable Housing Planning Guidance 2016
- Interpretation of Policy R2 to R6 - Public Open Space provision 2005
- The Interpretation of Policy NAP4 (Pollution of Groundwater and Surface Water) 2000
- Sustainable Design and Construction 2009
- Planning for an Ageing Population 2010

More information on these documents can be found at:

http://www.rbwm.gov.uk/web/pp_supplementary_planning.htm

Other Local Strategies or Publications

5.6 Other Strategies or publications relevant to the proposal are:

- RBWM Townscape Assessment 2010 - view at:
http://www.rbwm.gov.uk/web_pp_supplementary_planning.htm
- RBWM Parking Strategy 2004 - view
at: http://www.rbwm.gov.uk/web_pp_supplementary_planning.htm
- RBWM Strategic Flood Risk Assessment - view at:
http://www.rbwm.gov.uk/web_pp_supplementary_planning.htm

6 EXPLANATION OF RECOMMENDATION

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the legislative basis for the determination of planning applications and requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 In this case, the Development Plan comprises the saved policies of The Royal Borough of Windsor and Maidenhead Local Plan (adopted 2003, saved 2011), and the Ascot, Sunninghill and Sunningdale Neighbourhood Plan (2014). The National Planning Policy Framework (NPPF) 2012 is the Government's policy statement in relation to the Country's Planning System. All of the Borough's relevant development plan policies are broadly in line with the NPPF, so carry full weight. The Royal Borough Local Plan submission version was published for consultation in June 2017 with consultation running between 30 June and 27 August 2017. It has only limited weight.
- 6.3 The key considerations are therefore the extent to which the proposed development is consistent with Development Plan Policies, taking into account the submitted application details, plans, technical studies, and the Environmental Statement (ES), and other material considerations that weigh in the balance.
- 6.4 These policy and other considerations are set out and organised under the headings as follows:
- i. Green Belt and Very Special Circumstances
 - ii. Town Centre policy
 - iii. Site policy

- iv. Woodland and trees
- v. Ecology and priority habitat
- vi. Highways and parking
- vii. Archaeology
- viii. Design and character and appearance of the area
- ix. Residential amenity
- x. Sustainability, Energy & Flooding
- xi. Affordable housing and viability assessment
- xii. Environmental Impacts
- xiii. Planning Balance.

(i) Green Belt and Very Special Circumstances

- 6.5 The fundamental aim of Green Belt policy, as set out in paragraph 79 of the NPPF, is to keep land permanently open. Paragraph 87 states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 89 states that new buildings will be inappropriate and lists exceptions including buildings for agriculture, outdoor sport and recreation and limited development including extension, alteration, or replacement of existing buildings. Policy GB1 adopts a broadly similar approach to national policy.
- 6.6 The Borough Local Plan 2017 Submission Version at Policy SP1 Spatial Strategy, states that the Green Belt will be protected from inappropriate development in line with Government policy.
- 6.7 The applicants seek to justify the development in the Green Belt, which by definition must be considered inappropriate, on the basis of ‘very special circumstances’, as allowed for by NPPF paragraph 87. Paragraph 88 of the NPPF makes it clear that in the event of the Council having to consider a planning application, ‘substantial weight is given to any harm to the Green Belt’. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations’.
- 6.8 A ‘very special circumstances’ case has been put forward the thrust of which relates to the merits of providing a modern, state of the art replacement medical facility. The siting of the hospital on the previously undeveloped woodland allows continuity of service and the release of the existing hospital site for housing contributes to the cost of the service provision. These merits can be broadly accepted. The key consideration is the impact of the development on the Green Belt, any other harm caused and whether that harm is clearly outweighed by other considerations.

Very Special Circumstances

- 6.9 The priority for the Trust is to ensure sustainable delivery of a fit-for-purpose, modern healthcare facility to serve the Borough and wider community and to provide a high quality working environment for its staff. The case put forward is that the quality and excellence of facilities planned on this site promote healthcare investment, economic and residential development, investment in the road infrastructure and provision of CIL payments. The proposals also support the Government’s healthcare investment agenda and the Borough’s strategic development aims and objectives. The applicants’ ‘very special circumstances’ case summary is copied below:
 - Healthcare: overall estate objectives and principles including the nature of the trust’s activities and their regional significance.*
 - Employment: existing context and the continued contribution of the trust to the local and regional economy in relation to employment and additional benefits that will be delivered to the borough.*
 - Need: the essential needs of the trust and the need for a scheme that retains facilities within the Ascot area.*
 - Housing: provision of much needed (enabling) residential development contributing to the housing needs in accordance with the spirit of the neighbourhood plan and borough strategic objectives 2016-2020.*
 - Infrastructure: Provision of upgrades to the road network, including a roundabout and other improvements and Community Infrastructure Levy*

- 6.10 The 'very special circumstances' justification was provided within the original submission. Of the five areas put forward in the VSC case, the provision of infrastructure required to mitigate the impact of the development cannot be VSC and will not be considered further in this regard. The applicant was advised in writing of officers' preliminary assessment of the applications and invited to consider amendments in order to overcome significant concerns, principally relating to being able to justify locating the office building (administrative hub) providing accommodation for the Trust's central functions within the previously undeveloped woodland site in the context of Green Belt planning policy.
- 6.11 As a consequence, the Trust amended the application to remove the new administrative hub from the proposal and retain the 'Woodland Offices' building (Block 40) on the south edge of the existing hospital site permanently for the administration functions required by the Trust. The key reasoning for this decision related to the betterment in terms of the impact on the Green Belt, strengthening the 'very special circumstances' case and clinical strategy for development in the Green Belt plus the reduction in loss of woodland and priority habitat through the amendment. The services provided within the proposed hospital building and Block 40 remain the same as those set out in the original submission.
- 6.12 A supplementary document: "Very Special Circumstances Addendum with Medical Justification" has been submitted. It provides further detail on the health service benefits. It also clarifies the resulting employment generation; it states that the numbers employed on the site will expand to 710, an increase of 362. Whilst a number of these new jobs will transfer across from Wexham and Frimley Park, there will be increased job opportunities for the local population.
- 6.13 The applicant explains that the Trust needs to raise as much funding as possible from their own assets and income to fund the hospital. It is explained that the only method of raising sufficient funds is through the sale of the existing Heatherwood Hospital site for the redevelopment for residential purposes. Whilst this goes a certain way towards funding the new hospital, there is still a significant deficit, which the Trust will have to bridge with an NHS loan. Refer to the viability assessment addressed below at 7.141 – 7.143.
- 6.14 It is explained in the submission from the applicant that if the hospital were to be developed on the current site (as envisaged in Neighbourhood Plan policy) this would significantly reduce the amount of land, which could be sold off to raise funds for the hospital.
- 6.15 In consideration of the amended scheme it is noted that while the application has removed the administrative hub from the woodland site and relocated this office use to Block 40, the majority of its associated parking spaces, 55 of 100 are retained located within the proposed woodland. The 'very special circumstances' case does not address the location of office parking within the woodland site. Removing the office building from the woodland but not its associated parking is considered insufficient to overcome the weakness in the applicants 'very special circumstances' case.
- 6.16 There is no apparent justification for locating the office building within the undeveloped part of the woodland and there is no apparent justification for parking serving the offices, to be located within the woodland, particularly as the use primarily supports the Trust's central functions, largely delivered elsewhere. The fact that the location may be equidistant from Frimley and Wexham and beneficial to the Trust, and that jobs are created, does not translate into a justification to develop on the Green Belt, on previously undeveloped land, and with significant loss of woodland priority habitat contrary to policy.
- 6.17 The supporting document addresses a car parking options appraisal included with the original Design and Access Statement (DAS). This appraisal was undertaken at a point in the scheme design evolution and related to a development option wholly within the existing hospital site and does not relate to the present proposed scheme and so is of only limited relevance. It does however show that a decked car park for 357 cars results in a land take of 0.43ha less compared to the all-surface car parking for the same number. Decked parking is ruled out by the applicant solely on cost grounds.

- 6.18 It is apparent that the loss of woodland could be reduced with less land allocated to parking e.g. fewer parking spaces and / or through multi-level parking rather than all surface parking as proposed. It is accepted by officers that the applicant is endeavoring to keep cost down and it is acknowledged that multilevel parking is more expensive to construct but it would also result in a smaller site area and less cut and fill would be required. As the applicant has been unwilling to consider any amendment to the scheme to overcome this harm no analysis has been provided to assess this.
- 6.19 It is to be noted that the application as originally submitted produced a deficit of approximately £66.3m. The amended submission removes the administrative hub and indicates a much reduced deficit of £53.7m. The saved costs far outweigh the value of the 20 fewer dwellings as a result of retaining Block 40. A decked parking solution would impact on this saving but it would reduce the loss of woodland priority habitat. No analysis has been provided to assess this.

Harm

- 6.20 The Green Belt serves five purposes (NPPF paragraph 80):
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.21 The development of the hospital buildings, car parking and associated development within the woodland setting does not have a significant impact on the purposes of the Green Belt. It will not be perceived as sprawl or encroachment into the countryside because of the woodland setting and adjacency with the existing developed site, it is not in a sensitive area in terms of neighbouring settlements merging, it does not have an impact on the character of Ascot and as the existing brown field site is also being developed it can't be said that the proposal does not assist urban regeneration. However, given the scale and siting of the proposed hospital and car parking in an area where there is no existing physical development there will be harm to openness of the Green Belt.
- 6.22 It is therefore considered that the significant impact of the development is the extent of woodland loss. The proposed hospital development will result in the removal of a significant portion of the woodland priority habitat (3.66ha of 9.33ha or 38.6%) and existing trees, including a Class A Wellingtonia and groups of Class B/Class C trees. The area of woodland replanted is 0.98 ha. The net loss of woodland is therefore 2.78 ha or 30% of the total. It is acknowledged that the reduction in woodland site allocated to the development as a result of the amendment is approximately 0.47ha i.e. the site area reduces from 4.13 to 3.66 ha, or from 44% to 38.6% of the woodland site.
- 6.23 The NPPF at paragraph 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity and if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

(ii) Town Centre policy

Sequential test

- 6.24 The Trust is seeking to provide an office for its central services through co-location of departments currently operating over the three Trust sites (Heatherwood, Wexham and Frimley) into a single 'administrative hub'. As the proposed requirement is over the 2,500sqm a sequential test has been undertaken in line with the NPPF 'town centre first' approach.
- 6.25 Paragraph 24 of the NPPF states, '*Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in*

accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.'

- 6.26 The Trust's Sequential Test report concludes that there are no suitable sites, which meet the Trust's requirements within the centre of Ascot and the only suitable edge of centre site, is within the existing Heatherwood Hospital site. While sites were also considered outside of the Ascot area, it is argued by the applicant that given the specific requirements for the office space to operate in association with hospital operations, it was not considered practical or feasible to relocate the Trust's administrative functions in a town centre detached from any of the Trust's hospital sites.

Office Impact Assessment

- 6.27 Paragraph 26 of the NPPF states: *'When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floor space threshold (if there is no locally set threshold, the default threshold is 2,500sqm). This should include assessment of:*
- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
 - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.*
- 6.28 The assessment submitted explains that one third of the proposed office space will have a neutral impact as there will be no change in situation for these staff (they already work at Heatherwood) and therefore the main impact should be considered in relation to the remaining two thirds of office space (approximately 2000 sqm) where employees will be relocated from Wrexham Park and Frimley Park sites. If the Trust were proposing a building solely for the relocation of staff at Wrexham Park and Frimley Park Hospitals, a sequential test or impact assessment would not be required as the floor space would fall under the 2,500sqm threshold as set on in the NPPF, implying that impact would not have a significant adverse impact on the vitality of town centres.
- 6.29 The proposals fall within the healthcare sector, rather than being considered in the general office market, therefore turnover and trade draw are not considered relevant. It is noted that an availability search was undertaken in association with the sequential test for the office uses and no available office space within Ascot centre was identified. As a consequence the proposal would not draw any employees out of Ascot centre to the proposed site.
- 6.30 Furthermore the proposal seeks to relocate existing staff from within the Trust, and can therefore be considered a specialist office use rather than a generic office development with no intended occupier, which would draw future employees from existing office markets. The assessment concludes that there will not be any adverse impact on future development within Ascot centre nor on future investment and town centre strategy.
- 6.31 It is not accepted that the office use necessarily needs to be co-located with the hospital and the thrust of national policy guidance is to locate office use within town centres. However it is not considered unreasonable to change the use of a redundant hospital building for office use subject to all other consideration. The submissions in relation to the assessment of the appropriateness of the office use in this location are considered adequate.

GP surgeries

- 6.32 The proposals include facilities to accommodate three existing GP practices within the existing Block 40. Health centres are appropriate town centre uses and the site is not within a town centre. Paragraph 70 of the NPPF encourages the provision of new community facilities and also sets out

that community facilities should be integrated into a mix of uses including residential and commercial. Policy CF2 also supports the provision of new community facilities provided adequate parking is provided. The applicant has explained that there is already a GP practice on site and that there are significant benefits in co-locating these services close to the hospital. Given the edge of centre location, the existence of this use on the current site and the benefits derived from proximity to the hospital it is not considered that this is unacceptable. It is not clear though whether the facilities provided for the GP 'hub' are sufficient to meet their needs.

(iii) Site policy

- 6.33 The Neighbourhood Plan Policy NP/SS4 identifies Heatherwood Hospital as a major development site in the Green Belt. The site policy relates to the existing developed hospital site only and excludes the undeveloped woodland to the south and strip of woodland to the west, these excluded areas are included within the application red line site area and where development is proposed.
- 6.34 The policy derives from a very strong public desire to retain a hospital on this site and an appreciation that a modern, purpose-built hospital to house the services that will be retained on-site, would require a much smaller footprint than that currently occupied by the hospital buildings, enabling land to be sold off for residential development, which would help finance the new hospital and delivering an important contribution towards housing needs.
- 6.35 The intent of the policy is stated as: 'To ensure that the non-developed part of the Heatherwood site remains subject to the Borough's and national Green Belt policies. To secure as far as possible the continued existence of a hospital or healthcare services on the site.'
- 6.36 A summary assessment of the application proposal against the policy is set out in the table below.

Neighbourhood Plan Policy NP/SS4	Assessment
<i>NP/SS4.1 Not withstanding our policy NP/E1, redevelopment proposals for the Major Developed Site area of the overall Heatherwood site, as shown on Map 18, for residential use shall be permitted provided only that part of the site remains in its current use as a hospital or a provider of healthcare services.</i>	The hospital is to be redeveloped and improved and therefore meets the policy requirement in this respect.
<i>NP/SS4.2 In accordance with our policy NP/H1, a Development Brief must be produced prior to any planning application. This must encompass the entire Major Developed Site area being proposed for development, as defined on Map 18.</i>	The application is accompanied by a Development Brief and therefore meets the policy requirement in this respect.
<i>NP/SS4.3 Development proposals on this site are required to demonstrate high quality design reflecting the site's location as a gateway to Ascot.</i>	The design is assessed in the report below and is considered to meet this requirement.

<p><i>NP/SS4.4 Development proposals for the Heatherwood site are required to demonstrate the following:</i></p> <p><i>(a) A mix of housing types</i></p> <p><i>(b) The position of buildings should respect the site's gateway location and its relationship with the roads. Substantial green landscaping should be included, in keeping with the overall green and leafy character of the area</i></p> <p><i>(c) Provision of safe and accessible pedestrian and cycle routes to connect the site to Ascot station and Ascot High Street</i></p> <p><i>(d) The creation of green space(s) to be for the benefit of the community</i></p> <p><i>(e) The need to conserve and enhance the scheduled monument of the Bell Barrow on Bowledge Hill and allow public access to it.</i></p>	<p>(a) There is an approximate 60:40 split of houses and flats and a range of dwellings sizes and types. The proposals therefore meet the policy requirement in this respect.</p> <p>(b) – (d) The design is assessed in the report below and it is considered that these requirements are met.</p> <p>(e) The Bell Barrow is preserved in and enlarged open space however buildings over the Soldiers Pillar are proposed and this should be preserved, if reasonably possible, as an open space linked to the existing well-preserved barrow, which is a Scheduled Ancient Monument. This issue is considered under the 'Archaeology' heading below.</p>
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6.37 The proposals are in conflict with the site policy as the new hospital is located on the undeveloped woodland, outside the designated major site area.

(iv) Woodland and trees

Landscape Character

6.38 The Council's Landscape Character Assessment shows the site as 'Settled Woodland Sands'. Key characteristics include: *Strong framework of mature mixed woodland, some of ancient origin, which merge into the urban structure resulting in the absence of clear 'town and county' boundaries. Characteristic tree species: Oak, Birch, Scots pine, Beech, Sweet chestnut.* It is further described: *Woodland is the key landscape feature, in the type which is also often of historic and ecological interest. Its mature mixed structure forms a strong green framework, which conceals built form from views and prevents wider views across the landscape from higher ground.*

Tree Preservation Order (TPO) 003/2017

6.39 The woodland is protected by a 'woodland' designated TPO. The TPO was served earlier in the year to protect the woodland in response to development pressures at the site. Some recent work had resulted in damage to the woodland and the TPO is to deter further inappropriate works prior to the outcome of the current development applications and into the long-term.

Biodiversity Action Plan status

6.40 The woodland is listed on Defra's website as a priority habitat (Deciduous lowland woodland). UK BAP priority habitats are those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan. The UK list of priority habitats was drawn up in compliance with the requirements of the Natural Environment and Rural Communities (NERC) Act 2006 (England) Section 41. It is noted that much less than 50% of woodland in the local area is priority habitat.

6.41 The proposed replacement planting of woodland (3.66ha of woodland are removed and 0.98 ha replanted) will not necessarily restore the BAP habitat status in these areas and certainly would remove any ancient status for this part of the woodland. The result of the proposed development would be the loss of a significant part of the BAP woodland and likely ancient woodland on the site. It is unlikely that all the woodland planting will reach maturity to the same species climax vegetation as in the retained areas of woodland. This is because it tightly encloses the development on three sides, except for the access points, and may be considered oppressive, will reduce natural light into the development and there would be heightened issues over safety as the trees mature and the inconvenience due to debris fall. The raised bank, where planting is

proposed on the north side of the development, is steeply elevated and this will increase the perception of enclosure and add to the pressure for future tree removal.

- 6.42 The physical construction of the development is likely to require an area of access and working space and this is likely to result in further loss of woodland and or damage to it. It has not been demonstrated by the applicant that additional harm will not be caused to the retained areas of woodland which are protected by the TPO.
- 6.43 The applicant asserts they are creating 'new native woodland' by planting on the new contoured slopes. But this is only because they are removing the existing rich native woodland. The existing woodland is also important because of its soils and associated flora. The cut and fill associated with the development works will not be able to replicate the soil structure, composition and other species content. New planting stock is likely to be from a commercial nursery, which will not provide continuity in terms of the genetics of the trees/plants on the site.

Previous planning consent and woodland management plan

- 6.44 Planning application 04/00708 was approved in 2006 for the 'Construction of 20 x 3-bed terraced houses in 4 blocks (A), 18 x 2-bed flats in 2 blocks (B) and 108 keyworker bedsits in 6 blocks (C) plus associated access, parking and landscaping following demolition of 2 existing buildings and part of Heatherwood House'. Many trees were removed to facilitate this development with the mitigation being the management of the woodland immediately to the south to be brought into favourable condition and managed in perpetuity. A Section 106 Agreement was signed to secure the management plan with provisions including to:
- Maintain and wherever suitable restore the natural and ecological diversity including the reduction and control of 'exotic' flora and fauna.
 - Maintain and where appropriate improve aesthetic value
- 6.45 The plan is required to contain details including: the ownership of the woodland; an assessment of the Woodland including its features and ecological condition; any and all special characteristics of the Woodland, including an inventory of flora and fauna; a statement of objectives and management priorities; a long term strategy setting out all desired future conditions of the Woodland and what methods will be used to achieve this, including provision for monitoring and reviews; fixed point photography.
- 6.46 A woodland management plan was agreed and a review is now overdue and this has been brought to the attention of the applicant.
- 6.47 The mitigation (management of woodland) is required to last for the lifetime of the development. The current outline proposal does not show any changes to the original 04/00708 scheme, which remains the same. Therefore this outline proposal is in conflict with the obligations as it shows the removal of a significant part of the woodland, substantially undermining the important mitigation for the previous implemented scheme.
- 6.48 The S.106 Agreement places a legal requirement to manage the woodland so as to maintain and restore the natural ecological diversity. For example, it requires non-native invasive plants such as the rhododendron to be controlled/removed. Therefore this current application will not be able to secure any additional improvement to the quality of the woodland above which they are already obliged to do.

Ancient woodland classification

- 6.49 Ancient woodland is a woodland that has existed continuously since 1600. Before those dates, planting of new woodland was uncommon, so a wood present in 1600 was likely to have developed naturally. Because they have developed over such long timescales, ancient woods have unique features such as relatively undisturbed soils and communities of plants and animals that depend on the stable conditions ancient woodland provides, some of which are rare and valuable.

- 6.50 It is acknowledged that the central area had been cleared of trees in the past and small structures had been installed in this sector, which may have been for the cultivation of plants. The land parcels surrounding this central area show up as woodland on all the OS plans post 1816, submitted by the applicant. These concur with the set of OS epoch plans the Council has access to on its QGIS system.
- 6.51 Thames Valley Environmental Records Centre (TVERC) undertook a desktop assessment of the woodland in the Borough to assess whether any were ancient. They describe the woodland as WB36: Lowland mixed deciduous woodland and stated that it was probably ancient, but there is some uncertainty. Therefore the Council must adopt a precautionary approach and assume it is ancient unless evidenced to the contrary. The NPPF states: *'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'*.
- 6.52 The applicant has submitted an 'Opinion on woodland' which concludes that the woodland is not ancient. It is not considered that this is clearly evidenced and there are significant indicators to the contrary.
- 6.53 There are certain ground flora which are indicator species of ancient woodland. One of which are bluebells which are noted to exist on the site. The existence of non-native invasive plants such as Rhododendron has been shown to reduce the biodiversity of the area. Unfortunately, the lack of management to date of the undesirable invasive exotics is likely to have had an adverse effect on the woodland flora and fauna, leading to less diversity. This could distort an assessment of whether the woodland is ancient. However, the site has the potential to recover gradually once the rhododendron has been selectively removed, along with the removal of most of the laurel.
- 6.54 The difference in levels across the site is 25m, with much of this gradient occurring down through the woodland. Original woodland tended to survive on steep slopes or uncultivable terrain.
- 6.55 The survival of woodland relates to the value of its site for other purposes versus the perceived value of retaining it and this is location dependent. For example steep valley slopes which are not suitable for cultivation or even grazing may preserve ancient woodland. Areas of heavy soils, such as formed over boulder clays, or poorer sandy soils are more likely to preserve remnants of ancient woodland compared with fertile easily worked loams. We know the woodland is across a 25m gradient and the underlying geology is Bagshot Formation (sand).
- 6.56 Evaluating whether woodland is ancient or not relies mainly on map data. It is sufficient that the maps indicate ancientness (or do not indicate recentness) rather than prove it.
- 6.57 The applicant's submission contains a number of copied maps dating from 1970 back to 1873. These all show woodland except for a compartment in the centre of the site which had been cleared of trees. It is accepted this central area is 'recent' woodland rather than 'ancient' woodland.
- 6.58 The Rocque's map of Berkshire 1761 was one of the maps used by TVERC in their desktop study to identify areas of likely ancient woodland. This clearly shows woodland. It should be noted that the maps produced by John Rocque did not always show the woodland that existed and the fact that woodland is depicted on this map is a strong sign that the area was well wooded.
- 6.59 It is considered that the detail submitted by the applicant would appear to support both antiquity and continuity and conforms to the definition of ancient woodland. Even where a woodland may throw up indications and counter indications, a precautionary principle should reasonably be applied. The Roque's map 1761 clearly shows woodland, as well as the 1816 OS First Series (Old Series), both produced before 1844. In addition to the other maps which also show woodland, it can therefore be assumed the woodland was present since 1600.
- 6.60 The applicant states *'The client has taken the view of Natural England that the woodland is not ancient'*. This gives a false impression that Natural England has stated categorically it's not ancient. The woodland does not currently appear on Natural England's provisional inventory of

ancient woodland. This does not mean that parts of it are not ancient. The inventory is provisional and therefore it is open to the inclusion of other woods at any time in the future. Many counties in the south east of England have recently undergone an ancient woodland review. The Royal Borough of Windsor and Maidenhead is set to have this undertaken over the next 18 months by Thames Valley Environmental Records Centre, such that Natural England's inventory can be updated accordingly. The review will follow Natural England's latest guidance. It is anticipated that part of the woodland on the site will be found to be ancient.

SANG

6.61 The applicant is proposing to utilize the remainder of the woodland for public access. A number of new paths are indicatively shown along with performance space, public art, interpretation and seating areas and the creation of other clearings for picnic tables. This will result in the removal of further trees and other vegetation and increase the 'duty of care' the site owner has towards visitors. This duty of care will result in the need to carry out works to trees to remove identified risk, but consequently will remove features beneficial to wildlife. This will result in an overall deterioration in the quality and diversity of the woodland.

General

6.62 The applicant has not made an overall assessment of the woodland. Given it is a priority habitat and evidence indicates parts of it are ancient and it forms a landscape feature, it should be attributed an 'A' category and be subject to an overall assessment.

6.63 The 'Tree Removal/Retention Plan' shows the extent of the trees the applicant intends to remove to facilitate development. Whilst this includes approximately half of the trees in the woodland, it also shows the removal of the majority of the trees in the northern half of the site. The applicant has not submitted a proposed layout for the residential development with the tree constraints superimposed onto it. In the absence of this, a detailed assessment cannot be carried out on the full impact of the scheme on the few remaining trees. Further tree loss may occur should structures and hard standing be located within root protection areas. Other indirect effects such as shading, debris fall, over-dominance and concerns when large trees sway in windy weather could create an unreasonable interference with the enjoyment of the properties resulting in pressure to detrimentally prune or remove trees.

6.64 The tree removal shown includes a number of visually prominent trees, particularly next to the main road, Kings Ride. According to Council records two of these trees, an Alder and an Oak are on the adopted highway. Given the density of the residential development and its layout, there are very few places trees can be planted that wouldn't conflict with the use of the site. Much of the Indicative tree planting shown is unlikely to be sustainable.

6.65 Given the above, the scheme, if implemented, would result in the loss of a significant part of the important woodland and the vast majority of the trees within the existing developed hospital site. This would cause harm to the amenity and landscape character of the area. The proposal fails to comply with policies DG1, N6, H10 and H11.

(v) Ecology

Designated Sites

6.66 The proposed development site lies approximately 3.8km from the nearest part of the boundary of the Thames Basin Heaths Special Protection Area (SPA), which was classified on 9th March 2005 under the EC Birds Directive. The nearest part of the SPA lies in the Broadmoor to Bagshot Woods and Heaths Site of Special Scientific Interest (SSSI), notified by Natural England under the provisions of section 28 of the Wildlife and Countryside Act 1981.

6.67 The Council's Thames Basin Heath SPA Supplementary Planning Document (Part 1) states that within the zone of 400m to 5km from the Thames Basin Heath SPA, it is likely that additional residential dwellings (either alone or in combination with other new dwellings) are likely to have a

significant effect on the SPA unless mitigation measures are put in place. The guidance within this document stipulates that the agreed approach to mitigation is for developers to provide Suitable Alternative Natural Green space (SANG) (or financial contribution towards a Council SANG) and financial contributions towards strategic access management and monitoring. Natural England has been consulted on this application and consider the SANG proposals can provide appropriate mitigation for the impact on the SPA.

Priority Habitat

- 6.68 The entire woodland is priority habitat (refer to 7.40 above). Priority habitats are protected under the National Planning Policy Framework (NPPF), which states that *'council policies should, promote the preservation, restoration and re-creation of priority habitats ... the council should have regard for conserving this habitat'*.
- 6.69 The woodland contains a mixture of tree species associated with lowland mixed deciduous woodland including oak, birch, hazel, holly and sycamore and has at least five ground flora species associated with ancient or long established woodlands. It meets the criteria for being a priority habitat. The proposal will destroy this habitat, contrary to the NERC Act and NPPF, as the proposal is not preserving, restoring or re-creating priority habitats.
- 6.70 Planning policy and ecological best practice guidelines set out a "mitigation hierarchy" which states these steps should be followed in order:
- Anticipated biodiversity losses should first be avoided and reduced by using alternative sites and design.
 - Impacts considered unavoidable should be mitigated where the impact occurs if possible.
 - Remaining significant biodiversity loss should be compensated for, where possible by creating the same habitat type off-site.
- 6.71 As the proposed development will result in the loss of 3.66 ha of woodland (one third of the priority habitat on site), the applicant has considered the mitigation hierarchy and has undertaken a review of the habitat condition and assessment of the woodland at Heatherwood under the Defra Biodiversity Offsetting Metric Condition Assessment.
- 6.72 Following the assessment, the applicant's ecologist has stated that the woodland is of a poor condition and it was concluded that following development the condition of the remaining area of woodland will be increased from poor to moderate condition and have a gain in biodiversity. It has been stated that the increase in woodland condition can be undertaken through management of the remaining woodland, through non-native species clearance, creation of log piles and removal of litter and installing bird and bat boxes on the retained trees.
- 6.73 There is Section 106 agreement securing obligations for the management of the woodland (described above at 7.44 - 7.48). The applicants' ecologist has stated that in order to increase the woodland condition from poor to moderate, part of the mitigation would be to remove the non-native plant species and manage the litter. However, as is was already an obligation secured by a planning agreement, this current application will not be able to secure sufficient additional improvement to the quality of the woodland above which they are already obliged to do and therefore this cannot be used as mitigation for this current application. Other enhancements include installation of bird and bat boxes, opening up woodland glades and provision of log piles, but these are not appropriate measures to mitigate for the loss of woodland priority habitat.
- 6.74 In addition, it is not agreed that the woodland is of poor condition under the Biodiversity Offsetting assessment. The condition of the woodland was based on the Farm Environment Plan (which sets out criteria for conditions of habitats). For native semi-natural woodlands the criteria are as follows:
1. *Native species are dominant. Non-native and invasive species account for less than 10% of the vegetation cover.*
 2. *A diverse age and height structure.*
 3. *Free from damage (in the last five years) from stock or wild mammals – there should be evidence of tree regeneration such as seedlings, saplings and young trees.*
 4. *Standing and fallen dead trees of over 20 centimeters diameter are present.*
 5. *The area is protected from damage by agricultural and other adjacent operations*

- 6.75 A good quality woodland would meet all the above criteria, a moderate quality would meet four of the criteria and a poor quality woodland would meet three or less of the criteria. In line with the above, the woodland at Heatherwood does not meet criteria 1 as there is more than 10% of non-native vegetation (the majority of which is rhododendron and cherry laurel), however it does meet the remaining criteria and therefore it is concluded that the woodland is currently of moderate quality. By applying the biodiversity offsetting metric for a moderate quality woodland instead of a poor quality woodland, the application would cause a net loss in biodiversity units within the scope of the proposed on-site mitigation. In line with NPPF, as mitigation and compensation for this loss cannot be provided on site, it would therefore require off-site compensation, which has not been provided as part of this development proposal. It should be noted that off site compensation would bring with it an associated cost and would have to be secured for the lifetime of the development.
- 6.76 It has been proposed that the remaining area of woodland will be converted to SANG, as mitigation for the development by providing an alternative public space in order to discourage the public visiting the Thames Basin Heaths Special Protection Area (SPA). Currently the woodland experiences low visitor numbers as it is a privately owned woodland and can only be accessed by the residents on the Heatherwood site. Following development the woodland will be opened up to the public, with path creation and cleared areas for natural play and the increase in recreational pressure may have a detrimental effect on the remaining area of the priority habitat through disturbance to wildlife, littering and compaction of soil. There does not appear to be any parking for the SANG and therefore there may be future pressure to remove areas of woodland to accommodate this. This would further reduce the extent of the woodland and cause deterioration of the woodland habitat.
- 6.77 The proposed development will still result in a substantial loss of the priority habitat on the site and potential deterioration of the remaining woodland through the use of SANG, and therefore the proposed mitigation and compensation is not satisfactory to offset this loss. Off site compensation to compensate for the loss of the priority habitat on site would be required to ensure that there would be a no net loss of priority habitat within the borough.

Badgers

- 6.78 Nine badger setts were recorded including a main sett. Five of these setts, which were classified as being outlier setts, are to be lost to development. Two of these setts were deemed active at the time of survey, with the remaining being classed as inactive. Badgers are protected under the Protection of Badgers Act 1992, which makes it is illegal to willfully kill, injure or take a badger or attempt to do so, or to recklessly damage, destroy or obstruct access to any part of a badger sett.
- 6.79 The details provided regarding the closure of the setts are mainly acceptable. However, the ecologist is proposing to close the sett within the breeding season and Natural England has asked for further information regarding the status of the sett prior to determining whether or not the closure of the outlier sett is acceptable. Further survey work would need to be submitted to the LPA in order to assess the impact on badgers during sett closure to ensure the protection of badgers during and post development.

Bats

- 6.80 Bat activity surveys and automated surveys were undertaken across the entire site including the existing developed area and the woodland. The developed site does not offer good foraging and commuting habitat and showed low bat activity during the surveys. There will be no loss of foraging habitat within this developed area. The woodland offers good foraging and dispersal opportunities for bats and a reasonable complement of species were recorded within the woodland. The new hospital is to be sited within the northern portion of the woodland, which is likely to increase levels of artificial light within the remainder of the woodland. It is noted that the Environmental Statement Addendum contains a commitment to a lighting strategy to mitigate impact.

Breeding Birds

- 6.81 The site offers good opportunities for nesting birds in the form of trees, scrub and amenity planting particularly within the woodland. In addition, significant numbers of jackdaw were observed nesting within the soffits of several buildings on site. Breeding birds, their eggs and active nests are protected by the Wildlife and Countryside Act 1981, as amended. The ecology report makes reference to the protection of breeding birds during development including ensuring tree and scrub removal and building demolition is undertaken outside the breeding bird season (which spans from March to August inclusive) or any nesting bird habitat is removed under ecological supervision.
- 6.82 Policy NP/EN4.4 of the Ascot, Sunninghill and Sunningdale Neighbourhood Plan states, “*Significant development proposals which may result in the loss of bird nesting habitat must include by way of mitigation within the new development suitable alternative nesting habitat*”. Many trees are to be lost to facilitate the development, particularly within the woodland as well as buildings in which birds have been found to nest. The applicant’s ecologist has recommended bird boxes be installed onto retained trees and the incorporation of fruit bearing plants to compensate for this, this would ordinarily be secured through condition.

Invertebrates

- 6.83 The woodland offers opportunities for stag beetles and there are a number of records of stag beetles having been found within 1km of the proposed development site. No evidence of stag beetles was recorded during the ecology survey. The retention of deadwood on site would help maintain suitable habitat for stag beetles on site.

Great crested newts

- 6.84 Great crested newt surveys were undertaken in three ponds within the vicinity of the site, one being within the woodland on site. No great crested newts were recorded during any of the surveys and therefore the proposed development should not cause an adverse effect on great crested newts.

Hedgehogs

- 6.85 The vegetation on site could provide opportunities for hedgehogs and records of hedgehogs were highlighted within the local area. Hedgehogs are listed as a priority species, which makes them a conservation priority under Section 41 of the NERC Act 2006. The NPPF 2012 states, “*Planning policies should promote the protection and recovery of priority species*”.

Invasive Species

- 6.86 Rhododendron was recorded throughout the woodland. This plant species is listed under Schedule 9 of the Wildlife and Countryside Act 1981, as amended which makes it illegal to plant or cause it to grow in the wild.

Biodiversity Opportunity Area and Biodiversity Enhancements

- 6.87 The proposed development site lies within a Biodiversity Opportunity Area (BOA). BOAs identify where the greatest opportunities for habitat creation and restoration lie. Whilst BOAs do not represent a statutory designation or a constraint upon activities, they indicate areas where there are substantial opportunities to make positive changes for biodiversity, and should be used to inform conservation strategies and place planning.
- 6.88 Paragraph 109 of the NPPF states that: “*The planning system should contribute to and enhance the natural and local environment by [...] minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*”. In addition, Section 40 of the Natural Environment and Rural Communities Act 2006 states that “Every public authority must, in exercising its function, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

6.89 The outline SANG Management Plan and ecology reports provide an outline of biodiversity enhancements and management for the site. If planning permission were forthcoming then the SANG Management Plan would be secured in perpetuity through an agreement under Section 106.

(vi) Highways and parking

6.90 A Transport Assessment (TA) has been provided along with an addendum associated with the scheme amendments and to address issues raised following preliminary assessment. The TA considers the development impact on the highway and mitigation measures. Travel Plans are provided for both the hospital and residential developments.

6.91 The proposals include new highway access into the site and parking provision for the respective uses: the proposed hospital (350 spaces), the administrative use of Block 40 (100 spaces) and for the proposed 230 residential units (in outline with detail including parking for future Reserved Matters determination). It is noted in the TA that the site currently supports 469 parking spaces, which are generally less than 85% occupied.

Traffic impacts and mitigation

6.92 The proposal is to replace the existing hospital and the assessment indicates that the hospital does not have a material affect on the flows across the network although the changes in flow patterns particularly at Heatherwood Roundabout due to the changes in access arrangements does have an impact. The residential trips are new to the network and will have an impact. The TA assesses trip generation for all proposed uses and concludes that the proposed development can be accommodated by the surrounding network if the proposed mitigation works at the revised access and Heatherwood Roundabout improvements are implemented. It is noted that the scheme is in a sustainable location, provides for a replacement hospital and numbers of homes are in line with expectations identified in emerging policy.

6.93 There are a set of localised improvements proposed which will offer capacity and safety improvements to the wider network, but their primary reason for implementation is to support the new access points for the hospital and residential development. The TA details include:

1. *Heatherwood Roundabout – it is proposed that the arms of High Street, Kings Ride and London Road and the circulating carriageway are widened to allow for three lane approaches. Phase 1 to be implemented prior to the occupation of the new hospital. This phase will provide the improvements to the Kings Ride and London Road approaches. Phase 2 to be implemented prior to the occupation of the new residential development. This phase will complete the mitigation scheme for roundabout by improving the High Street approach.*
2. *High Street & Station Hill Roundabout - in principal the residential development has a marginal increase on the total flows through the junction to the extent that these would easily fall within the general 10% daily variation and therefore would not warrant additional mitigation. However due to the limited highway space at this junction, there is limited scope to provide a suitable scheme that would considerably improve the operation of this junction to address the current issues witnessed on site. The junctions require comprehensive review as part of a wider strategic study of the area. The natural option within the current land ownership boundaries would be to implement traffic signals. Before such a scheme is considered and given that the introduction of traffic signals is not promoted through the Council's manifesto, other alternatives could be considered if privately owned land was made available.*
3. *Proposed Toucan Crossing - In addition to the site access and improvements at Heatherwood Roundabout, the development also proposes a new Toucan (pedestrian/cyclist crossing) between the two site accesses on the High Street. This signalised crossing upgrades the existing informal crossing point and provides a formal linkage between the bus stops and the cycle ways on both sides of the High Street.*

Access and servicing

- 6.94 The proposals seek to reconfigure the three existing access points to serve the future development. The two High Street junctions (Gates 1& 2) will be improved (T-junctions with right turn lanes) to serve the majority of the residential development, with a small proportion accessing off Kings Ride (at Gate 3) together with the new hospital complex.
- 6.95 Design amendments have been made and include the provision of a continuous 3.0m wide shared cycle way / footway along the site frontage and the provision of a staggered toucan crossing. Whilst these access amendments to the High Street are generally acceptable, subject to detailed design, justification has still not been given through qualitative and quantitative data that a second toucan crossing is indeed necessary
- 6.96 The proposed Gate 3 Access to Kings Ride comprises a new 28m diameter roundabout junction. The proposed arrangement has been amended and whilst deflection at the new roundabout junction to Kings Ride has been improved, there remains a potential problem with conflicting traffic movements occurring on Kings Ride in close proximity to new roundabout location and the existing private access road known as Kings Ride Court.
- 6.97 A dedicated servicing and delivery link road is proposed to the hospital service yard. In addition a one-way shared surface link has been incorporated along the hospital frontage, serving busses, taxis and emergencies. There will be a drop off facility for patients and visitors within the public car park.
- 6.98 The proposed residential road layout has been designed to keep speeds low. The access to Brooke Avenue is to be maintained and improvements made to the emergency vehicle access to create a new two-way secondary access to reduce potential impact on the existing residents during construction of the hospital. It is stated that there have been discussion with residents regarding improvements to their parking and gate access arrangements.

Parking

- 6.99 A primary objective of the Borough's parking standards (2004) is to reduce the amount of land dedicated to parking and to reduce the need to travel car. It sets out the maximum amount of parking to be provided in different circumstances.
- 6.100 The residential application is in outline and parking arrangements are for later consideration at Reserved Matters stage. The parking standards for the various hospital and office elements are set out in the table below alongside the proposed parking provision.

Use Classification	RBWM Parking Strategy (2004) Maximum Provision		Proposed parking
B1 Office	1 space per 35m ²	94	100
C2 Hospital	1 space per 4 FTE, plus 1 Space per 3 daily visitors	98+123 = 248	200+150 = 350
D1 Doctors, Health Centers	3 spaces per consulting room (including staff)	27	
		342	450

- 6.101 The justification for the parking proposals are based on the current parking associated with the existing hospital. It is stated that there are 422 spaces which will be reduced to 350, a reduction in 72 spaces. It is argued that the proposed new hospital will have 390 staff (full time equivalent / FTE) some of which will be shift working and there will be overlap during handover periods. In terms of visitor parking it is argued that the new hospital will result in an increase in patients of 42%. It is argued that RBWM parking standards are not realistic.
- 6.102 Prior to the amended submission and TA Addendum officers were of the view that this was a gross overestimation of the number of visitors predicted to attend the new hospital. This was based solely on the information and assumptions made in application documentation including a

Technical Note dated February 2017, which suggested that all the patients, irrespective of their condition and length of their appointment would drive to the hospital and receive a visitor.

6.103 The TA Addendum reports that the new hospital will generate an additional 202 patients per day compared to the existing use, which warrants retaining much of the existing parking spaces. In paragraph 4.6.20 It states that: *'The RBWM parking standards for the hospital were used in previous calculations to only include a simplistic definition of the hospital activity, only including surgery and endoscopy (day case). This calculation excluded the highest used area of the hospital, the outpatient floor (Floor 1). Using the simplistic calculation does not provide an accurate representation of the actual generation of the hospital.'*

Public transport and cycle provision

6.104 Ascot railway station is located off Station Hill about 1.3 km from the site (in a south easterly direction). The nearest bus stop and shelter is located outside Gate No. 2, Heatherwood Hospital access, on the High Street where Route 01 serves Sunninghill and Sunningdale with some services extending to Windsor each day except Sundays and Public Holidays. Further west Route 701/702 provides a more frequent and regular service between Bracknell and London Victoria via Windsor and Slough. Route 162 also provides a very limited service to Bracknell from mid-morning to early afternoon on weekdays and Saturdays.

6.105 It is proposed that there will be two new bus shelters located outside the main entrance of the new hospital, to be maintained by the Trust, and real time information provided.

6.106 A total of 65 cycle parking spaces to serve the hospital will be provided in the form of 33 cycle parking stands, plus space will be reserved for future expansion. This level of cycle parking is considered acceptable.

Summary

6.107 The TA concludes that the proposed development can be accommodated by the surrounding network if the proposed mitigation works at the revised access and Heatherwood Roundabout improvements are implemented. If planning permission were forthcoming these would be secured through a Section 106 agreement and/or conditions leading to a Section 278 agreement.

6.108 The hospital parking strategy remains unchanged from the previous submission and still proposes a parking provision of 450 spaces. The only material difference is the relocation of 45 car parking spaces from the woodland site to the more immediate vicinity of Block 40.

6.109 With regard to the hospital element of the development the proposal would lead to a reduction in car parking spaces compared to the existing hospital. The services provided within the existing hospital and not directly comparable to the new hospital; the parking standards are worked out however on floorspace. The additional information provided to justify the parking provision for the new hospital is at times misleading and contradictory to previous information submitted. Nevertheless, it is considered that it would be difficult to sustain an argument that, despite the parking levels exceeding RBWM's current maximum standard, the consequences would be detrimental to those that reside or commute in the area. Other impacts of the parking proposals in terms of loss woodland priority habitat are considered elsewhere in this report.

6.110 The revised scheme will result in a reduction from 250 to 230 residential units, which is welcomed on highway grounds, given that this would lead to a proportional reduction in vehicular trips into the highway network compared to the previous submission. The car management plan for the whole site is considered acceptable together with the additional gradient for the hospital access roads. If permission were forthcoming this would be secured through condition.

(vii) Heritage

Scheduled Ancient Monument - Bell Barrow on Bowledge Hill

6.111 The principal historic environment aspect of this proposal is the presence of a Bronze Age bell barrow (dated to c. 1,500 BC through radiocarbon dating) within the grounds of the Hospital, which is a Scheduled Monument and of national importance. The Scheduled Ancient Monument is to be preserved in situ, its setting enhanced by the removal of buildings and hard standings in its vicinity and it will sit within more open space, more reflective of its pre-Hospital setting.

Soldier's Pillar

6.112 The Scheduled barrow was one of possibly as many as four barrows, originally forming a cemetery, on Bowledge Hill. One of these barrows, notated as Soldier's Pillar on historic mapping, has now been identified by the applicant's consultant (TVAS) in exploratory archaeological investigations. The monument is represented by a ditch that would have encircled the mound. By extrapolation, the ditch has a diameter in the region of 25m, significantly larger than that of the Scheduled barrow (17m in diameter). No trace of in situ mound material was evident within the limited area investigated. It is assumed that it was largely leveled when the adjacent Hospital buildings were constructed. However 'the surface of the ground...rises almost imperceptibly to the southeast where the barrow mound is predicted to have stood. It is not clear if this rise is a byproduct of root growth and tree planting or does reflect the former presence of the mound. It is considered that the latter is the more likely scenario...' (TVAS, March 2017). It is not inconceivable that a slight skim of the in situ mound survives elsewhere within the footprint of the monument or a remnant of the buried land surface within the lower part of the modern topsoil. It is noted that TVAS identified a feature that could represent evidence for pre-barrow cultivation, as was recorded under the Scheduled Monument.

6.113 The Soldier's Pillar monument is clearly not as well preserved as the adjacent Scheduled Monument and has suffered the loss of most, possibly all, of its mound, while services and foundation trenches have cut across its ring ditch and the interior of the monument. However it retains an archaeological significance by virtue of its association with the adjacent Scheduled Monument, its relatively large size and the low numbers of comparable monuments in the current and former heathlands of east Berkshire. The Scheduled Monument at Heatherwood Hospital is the only one of these monuments to have been investigated by modern archaeological methods (Bradley and Keith-Lucas, 1975), which demonstrated its archaeological significance.

6.114 Berkshire Archaeology advises that the Soldier's Pillar barrow should ideally be preserved in situ, and if this is not reasonably possible, it should be subject to detailed investigation and recording prior to its loss. Its preservation in situ and an open space linking the Scheduled Monument and Soldier's Pillar would enhance more the setting of the Scheduled Monument and reflect better the context of this barrow cemetery than the currently proposed open space.

6.115 The fixed layout of the proposed residential development is a parameter for approval in the outline element of the application and does not provide for the preservation in situ of the Soldier's Pillar monument. The applicant has been asked to give consideration to ways of achieving this objective.

6.116 The applicant has addressed this in the Addendum to the Environmental Statement and argues that the need for development can outweigh blanket preservation in-situ of unexceptional or indifferently preserved deposits.

6.117 It has not been demonstrated that it is not reasonably possible to preserve the Soldier's Pillar barrow in situ. During the course of the application it has been suggested to the application that consideration within the application of the residential layout could be deferred for consideration to the Reserved Matters stage so that further consideration could be given to this but the applicant has declined to do this.

Existing Hospital Buildings

6.118 Paragraph 141 of the NPPF states that local planning authorities should 'require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'. Following Berkshire Archaeology's preliminary advice, TVAS have prepared a project specification for the recording of the existing Hospital buildings,

especially the original 1920s Hospital buildings, which were purpose-built for the care of patients suffering from TB. This project specification is acceptable.

(viii) Design and character and appearance of the area

Masterplan

6.119 The masterplan locates the new Hospital within the existing woodland and the residential on the existing hospital site. This gives the hospital the advantage of the woodland setting, and distant views to surrounding countryside. New residential blocks of flats address the High Street and Kings Ride site frontage creating a gateway to Ascot. The overall masterplan strategy is considered appropriate.

Hospital building

6.120 The hospital is on a site sloping south into the woodland and the building will be 3 storeys high, plus fully enclosed rooftop plant, when viewed from the upper level, with a further “half” storey at the lower plateau level. The design and appearance of the building is characterized by a brick / masonry plinth, a metallic clad interlayer intended to render this layer visually recessive and a lighter timber clad cantilevered top floor with metal louvered cladding to the roof plant.

6.121 The hospital massing and design detail, with projecting colonnade and cantilevered upper floor give the building a civic presence. It is a functional design appropriate to the use and the height and bulk are mitigated by the level change and by the horizontal layering of the building.

Block 40 alterations

6.122 The change of use will comprise refurbishment works but will not significantly affect the external appearance of the building.

Residential development

6.123 The matters for approval include access, land use and siting of development plots, and scale / heights. Detailed design and appearance and landscaping are for future Reserved Matters application/s.

6.124 The proposed siting provides development plots and open space defined by the street grid. Blocks of flats up to 5 storeys address the High Street and Kings Ride. These are set back approximately 15m from the road with a landscape buffer. Views have been generated as part of the Environmental Statement, to show the effect on views from the High Street and Windsor / London Road roundabout. This is considered acceptable subject to future approval of detailed design. It is considered that the development has the potential to contribute to improving the quality of the urban frontage and streetscape on arrival to Ascot and given the scale of the existing hospital buildings, it is considered that the proposed 5 storey blocks are not out of character.

6.125 There are 8 plots for lower rise housing up to 3 storeys high. The street grids are grouped around the central green space including the Bowledge Hill round barrow. Access will be from two existing access points from the High Street (A329), which will be improved to allow access from both sides of the carriageway. Access from the west of the site is provided from the hospital access road and utilises the existing woodland offices access road. The access proposals are considered appropriate and maintain the character of the area.

6.126 The residential design albeit in outline is considered to meet the requirements as set out in the Neighbourhood Plan Policy NP/SS4 and to be an acceptable form of development. In the emerging Borough Local Plan (Submission version July 2017) the Heatherwood Hospital site has been allocated under Policy HA23 for approximately 250 homes in addition to retained health use. The 230 residential units proposed and the resulting density is considered acceptable. Policy R4 requires 15% open space provision. The proposed formal public open spaces amount to approximately 9%, and additional space making the required 15% is provided as linear green planted strips on the

northern and western boundaries. Proximity to the proposed SANG provides further publically accessible green space.

(ix) Residential amenity

- 6.127 Concerns have been raised that the proposal will adversely impact on the amenities of existing occupiers adjoining the development site. The proposed hospital building will be in view from Brooke Avenue properties but is sited approximately 85 m away from the nearest residential window. It is not considered that it will result in any significant detrimental affect on outlook because of the significant separation. A planting buffer is proposed which would mitigate the impact of the loss of woodland and outlook from the existing properties.
- 6.128 The proposed residential development will be in close proximity to the existing residential properties off Brooke Avenue. Detailed design is for future consideration but generally the proposed new development is in the form of houses up to 3 storeys with rear gardens backing onto the gardens of existing properties. It is considered that this will result in a reasonable relationship and without causing any significant detrimental impacts on amenity that would warrant refusal of permission.

(x) Sustainability, Energy & Flooding

Sustainability & Energy Strategies

- 6.129 The new Heatherwood hospital building will be assessed using the BREEAM environmental assessment methodology and is registered under the New Construction 2014 (Healthcare) scheme. A BREEAM pre-assessment has been undertaken and indicates that a rating of 'Very Good' can be achieved.
- 6.130 The design seeks to minimise the impact of the development on the environment and improve its quality where viable, by prioritising passive design measures to reduce energy demand before introducing low energy systems and zero carbon technologies. In accordance with the RBWM planning policy, a minimum 10% of expected energy demand is to be met from decentralised and renewable or low carbon sources, where viable. A feasibility study has resulted in a proposal for the inclusion of a Ground Source Heat Pump (GSHP) system coupled with a PV array.
- 6.131 Further measures are proposed to reduce the energy used to heat hot water services, in addition to reducing water consumption overall, these include the installation of low flow sanitary fittings, to reduce the water consumption by at least 25% (L/person/day) when compared to a baseline performance level.
- 6.132 The scheme amendments introduce 950 sq m of bio-diverse green roof have been included as part of the hospital development.
- 6.133 Provision for operational waste and segregated recycling will be provided on-site, to allow waste to be disposed of in line with local guidance and the Heatherwood and Wrexham Park Hospital Waste Policy. The contractor will also be required to produce a site Waste Management Plan, detailing the targeted volume of construction waste ($\leq 7.5 \text{ m}^3 / 6.5 \text{ tonnes per } 100 \text{ m}^2 \text{ GIFA}$).
- 6.134 It is stated that appropriate noise mitigation measures such as attenuators, acoustic louvers, screens, anti-vibration mounts and enclosures will be investigated, to suitably control noise emissions and ensure that that the appropriate rating level is not exceeded.
- 6.135 The findings and design solutions detailed in this Sustainability Statement provide an overview of the scheme's sustainability credentials in terms of the progressive design, construction and operation of the building, it eludes to how the redevelopment will be of positive impact to the local environment.

Flood Risk Assessment and Drainage Strategy

- 6.136 A full Flood Risk Assessment has been carried out in accordance with the National Planning Policy Framework (NPPF) and confirms that the site is at low risk of flooding from all sources.
- 6.137 The strategy for the residential development is to provide new surface water drainage runs to collect the run-off and discharge to the existing surface water drainage networks on site. For the hospital and in accordance with the national drainage design guidance and RBWM Drainage and Environment Policies, it is proposed to manage the proposed run-off at source via sustainable urban drainage systems (SuDS). The new surface water drainage network will discharge to an attenuation pond, which will replace the existing attenuation tank on site. For the car parking areas it is proposed that permeable paving will be used to decrease the amount of area draining to the attenuation pond.
- 6.138 In regards to capacity of the foul water networks it is proposed to discharge into, it is reported that Thames Water has confirmed that whilst the combined proposed flows from the developments exceed the existing rate, there is still sufficient capacity for the proposed flows into the Thames Water foul network.
- 6.139 The development and its drainage system will be designed to cope with the intense storm events up to and including the 100 year return period rainfall event with an allowance for climate change.
- 6.140 The Project Centre provide expert advice on flooding to the Council and has set out a number of recommendations for detailed design and have requested further detail to be provided. These matters could be subject of a planning condition were the development otherwise acceptable.

(xi) Affordable housing and viability assessment

- 6.141 The Council requires 30% of housing to be affordable, as set out at policies H3 and H4 of the adopted Local Plan and explained in Guidance (2016). Policy HO3 of the emerging Local Plan Submission Version states that a minimum requirement of 30% affordable housing units will be sought, subject to a number of considerations including: the costs relating to the development in particular the financial viability of developing the site.
- 6.142 A viability assessment has been undertaken to support the planning application and this has been assessed by the Oxford Valuation Office (DVS – VOA) who have provided expert advice to the Council on this matter. The DVS assessment confirms that affordable housing would not be viable as the residual land value of the all private 230 unit scheme at approximately £31m would still leave a large deficit for the Trust to fund both the new hospital and the refurbishment of Block 40, estimated cost of approximately £84.7m.
- 6.143 The viability assessment has not been updated to reflect the amended scheme. However it is to be noted that the application as originally submitted included 250 residential units with a residual land value of approximately £38m, and an administrative hub building with an estimated cost of approximately £19.6m in addition to hospital and Block 40 conversion costs (approximately £84.7m). The affect of amending the application indicates a reduction in the deficit from £66.3m to approximately £53.7m but this is still substantial and it is accepted that affordable housing would still not be viable, on the basis that the scheme itself is not viable.

(xii) Environmental Impact

- 6.144 The development was the subject of an Environmental Impact Assessment (EIA), in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015), and an Environmental Statement (ES) has been submitted. The ES was found to be incomplete and a formal request under Regulation 22 of the EIA Regulations was issued on the 7th February 2017, requesting additional environmental information. The application was formally amended through a submission made in late April 2017 and included an addendum to the Environmental Statement which incorporates a response to a Regulation 22 Notice.

6.145 The ES covers the necessary matters including cumulative impacts and it sets out mitigation where appropriate for both the construction and operational (i.e. as built) phases of the development. The ES meets the terms of the relevant EIA Regulations and provides the data and information required to adequately assess the proposals on the environment.

Consideration of alternatives

6.146 The EIA Regulations require an Environmental Statement (ES) to include an outline of the main alternatives considered by the Applicant, indicating the main reasons for the choice made, taking into account the environmental effects. Alternatives should only be considered where they are feasible, realistic and genuine, based on factors such as planning policy, land ownership, viability and feasibility. Main alternatives considered and preferred choices for the development were: No Development; Alternative Forms of Development; Alternative Quantum of Development; and, Alternative Layout of Development.

6.147 The principle of development at the site has been set through policy and a 'no development' option no longer represents a reasonable alternative at the site. The Planning Very Special Circumstances case states that to acquire a new site would be cost prohibitive and would lead to the loss of the Heatherwood Hospital locally, major disruption to patients and staff and would lead to the need for an alternative Green Belt site being acquired.

6.148 Alternative forms of development, alternative quantum and layout of development has evolved through design development and public consultation since March 2016. The design changes included:

- Ratio of houses to apartments from 40:60 to 60:40.
- Omission of woodland villas
- Omission of administrative hub from the woodland
- Reduction in residential development from 250 to 230 units
- Repositioning of apartment blocks to form a green buffer following concerns raised about the setting and proximity in relation to the High Street and London/Windsor Road roundabout.
- An increase in open space focused around the Bell Barrow on Bowledge Hill and the eastern gateway.
- Separation between eastern and western vehicle routes to avoid vehicles cutting through the site from High Street and Kings Ride.
- The formation of pedestrian and cycle route to create a new 'Ride' between the High Street and the proposed hospital.
- Reconfiguration of the eastern portion of the masterplan to retain more trees and create more open space around the single Grade A1 classified tree.
- An east/west pedestrian link was re-established to provide improved access to open green space.

6.149 A summary of environmental effects associated with the design changes is provided within the ES Addendum.

Cumulative effects

6.150 The EIA Regulations require the assessment to consider the likely significant effects of the proposed development in combination with the other local developments in the area that received planning permission. These effects are known as cumulative effects. A desktop review was undertaken together with data issued by the RBWM of committed developments within the surrounding area. It was considered that none of the committed developments were necessary to be considered as part of the assessment as these were unlikely to have any cumulative impact with the proposed development at Heatherwood Hospital due to distance from the site and size.

Environmental impact and mitigation

Transport

- 6.151 The construction of the proposed development is likely to generate additional traffic on the local highways network, however this will be managed through the implementation of a Construction Logistics Plan, which will look at the safe routing of vehicles.
- 6.152 The operational stage of the proposed development has generally been identified to have negligible effect including driver delay, which results in an overall minor beneficial effect due to the proposed improvements works to Heatherwood roundabout junction. Additionally, a number of pedestrian and cycle improvements are proposed as part of the planning application. This will result in a long term, local, minor beneficial effect.

Townscape and Visual

- 6.153 In terms of the visual impact, the effect on views from the High Street and Windsor / London Road roundabout will be beneficial, improving the quality of the urban frontage and streetscape on arrival to Ascot.
- 6.154 To the east and south of the proposed development, which are more natural in character and dominated by mature woodland, the significant tree loss and increase in development will have an adverse impact on short distance views. However, a tree planting scheme will be implemented to break up or screen the views of the proposed development together with the implementation of 6.1 hectares of SANG immediately east and south of the new hospital site to enhance to immediate vicinity around the proposed development.
- 6.155 The amendments to the scheme reducing the level of the plateau, reducing the overall height of the hospital building, reducing woodland car parking and retention of several trees has improved the situation but a direct permanent, moderate (previously major) adverse effect on a local view remains. The reduction in woodland lost will have a slight betterment on landscape views.

Cultural Heritage

- 6.156 The original ES noted the likelihood that three additional round barrows exist on site but which have probably been destroyed by, or indeed prior to, the construction of the hospital or car parks. It is noted that there may be further unrecorded below-ground heritage assets, construction may adversely impact these assets.
- 6.157 Since the submission of the original ES and consultation with Berkshire Archaeology further evaluation of the hospital site has been undertaken. This included an evaluation around the site of the Soldier's Pillar barrow. It was found that this monument now survives only as a ring ditch below ground, damaged to varying degrees by modern services and foundations of nearby buildings. This issue is considered under the Archaeology section heading of this report.
- 6.158 The ES states that following appropriate mitigation, it is not anticipated that there will be any adverse effects from the proposed development on heritage assets or their setting. Beneficial effects include the enhanced setting of the Scheduled Ancient Monument.

Ecology and nature conservation

- 6.159 This topic is considered more fully under the Ecology section heading of this report.
- 6.160 The Addendum to the ES addresses concerns raised by Natural England (NE), and provides more information on the proposed SANG and the impact on the SPA. The ES Addendum states that the SANG meets the NE criteria and is in accordance with policy NRM6 of the South East Plan, and thus avoid any adverse effect on the SPA.
- 6.161 The Addendum to the ES addresses concerns raised by RBWM regarding the assessment of Priority Habitats. The woodland priority habitat is 9.47 ha and under the revised scheme 3.66 ha is lost to create the hospital (reduced from 4.13 ha) and 0.98 ha is restored (reduced from 1.35 ha) compared to the original scheme. The area affected is stated to comprise 39%, the net loss 28%. The retained woodland would be delivered to beneficial management and to enhance its ecological

interest. The ES Addendum states that prior to mitigation the effects on the woodland are adverse at the local level and of moderate significance.

6.162 It is stated that the loss of woodland has been minimised as far as possible. The impact of the loss of woodland is mitigated by the introduction of a bespoke SANG and associated works including to clear invasive species. Following mitigation it is stated that the effects are beneficial at the local level and of minor significance.

6.163 The ES Addendum states that the current biodiversity value of the woodland is deteriorating from a lack of management, and that the proposed SANG would deliver high quality woodland secured on a management plan and is considered to be a significant net gain in biodiversity value.

Socio-Economics and Health

6.164 Economic impacts during construction are considered to be beneficial. Construction will create temporary jobs in the area, benefiting the local and national economy through associated indirect effects. The development will provide significant net additional Gross Added Value (GVA) locally and nationally. A Construction and Environmental Management Plan (CEMP) has been developed to mitigate construction stage effects, to include proposals for, a remediation strategy should contaminated land be encountered on site.

6.165 Economic impacts associated with the operation of the development are considered beneficial. It is likely that the majority of jobs would be taken up by people living within the area and a high percentage of goods and services and household expenditure are assumed to occur in the study area. The impacts on net additional employment and associated GVA are considered to be moderate beneficial. Employment at site will ensure that the health sector continues to grow in the area. Furthermore, there will be additional council tax revenue and a minor beneficial effect on the housing availability in the area and the local economy from new retail expenditure in the area from new residents.

6.166 Health impacts associated with the operation of the development include a moderate beneficial significant effect in relation to the provision of new health services and also access to outside space and green views. The location of the site should also help support more trips by walking and cycling through good access to Ascot High Street and the Ascot railway station

Noise and Vibration

6.167 Operational noise will be managed through control of noise at source and control of noise between the source and red line boundary. Measures include selection of low noise plant items and appropriate landscaping at red line boundary to reduce noise levels.

Hydrology, Flood Risk and Drainage

6.168 Potential impacts may occur should drainage from the proposed development discharge to the existing attenuation tank. This is because the topography slopes down to the attenuation tank in the south, which could also impact the railway line in the south. Therefore, mitigation measures comprise surface water drainage strategies which include the balancing pond and onsite Sustainable Urban Drainage Systems (SUDS).

Conclusion leading to recommendation

(xiii) Planning balance

- 6.169 Paragraph 14 of the NPPF states, “at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For decision-taking this means:
- approving development proposals that accord with the development plan without delay; and
 - where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when against the policies in the Framework taken as a whole; or
 - specific policies in the Framework indicate development should be restricted (i.e. land designated as Green Belt; designated heritage assets...).
- 6.170 In accordance with guidance contained in the NPPF and following case law the balancing exercise that needs to be undertaken in this particular case includes whether there are ‘very special circumstances’ which would clearly outweigh the harm to the Green Belt and any other harm, particularly the loss of woodland priority habitat. Whether that harm has been adequately avoided, mitigated or as a last resort compensated for, must also be considered and weighed in the balance.

Very Special Circumstances

- 6.171 In accordance with national policies this form of development in the Green Belt is inappropriate which should not be approved except in very special circumstances. Paragraph 88 of the NPPF makes it clear that in the event of the Council having to consider a planning application, ‘**substantial weight** is given to any harm to the Green Belt’. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations’.
- 6.172 The proposals do not have a significant impact on the purposes of the Green Belt but result in harm to openness by reason of the scale and siting of the proposed hospital.
- 6.173 The ‘very special circumstances’ case put forward points to the clear merits of providing a modern, state of the art replacement medical facility. The siting of the hospital on the previously undeveloped woodland allows continuity of service and the release of the developed site for housing contributes to the cost of the improved service provision. Therefore the principle of a very special circumstances case for developing a replacement hospital on the previously undeveloped part of the Green Belt site can be considered, in accordance with policy. This can be given **significant weight**.
- 6.174 The proposal for office parking serving the Trust’s central functions, largely delivered elsewhere, to be located within the woodland, represents a significant weakness in the ‘very special circumstances’ case. The all-surface parking results in **significant harm** through loss of woodland priority habitat. Before consideration of whether the benefits of the proposals overall outweigh this harm, consideration must be given to whether the harm has been avoided, adequately mitigated or as a last resort, compensated for as required by planning policy.

Harm to woodland priority habitat

- 6.175 The NPPF states that if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused (NPPF 118). The reasons for locating the hospital on the woodland and the rationale for its design in terms of operational need are clear therefore the key question is whether the loss of woodland resulting from the parking proposals has been mitigated or minimised.
- 6.176 The application as amended reduces by 0.47ha the site area and woodland lost. While this mitigation through reduction of the scheme is welcome the amended scheme still provides parking serving that office building, 55 of 100 spaces, remotely located within the proposed woodland car

park. Retaining office parking where it contributes to the direct loss of woodland priority habitat has not been justified.

6.177 Because of the importance of the site as priority habitat it is considered imperative that its loss should be minimised. The car parking proposed in overall terms is significantly in excess of the Council's adopted maximum parking standards. A primary objective of the Borough's parking standards is to reduce the amount of land dedicated to parking. The concern here is not primarily about the overall number of parking spaces per se but the failure to reduce the land allocated to parking and the significant loss of woodland priority habitat that results which is attributed significant weight in the planning balance as harmful.

6.178 It is apparent that the loss of woodland would be reduced with less land allocated to parking e.g. fewer parking spaces in line with standards and / or through multi-level parking rather than all surface parking as proposed. It is accepted that the applicant is endeavoring to keep costs down and it is acknowledged that multilevel parking is more expensive to construct but it would also result in a smaller site area and less cut and fill would be required. This is material to the consideration of the application as it accords with the mitigation hierarchy – the harm could, in this instance, be avoided.

6.179 Furthermore, for the reasons stated it is not accepted that the improvements to the retained woodland can compensate for the harm nor that compensation for this loss can be provided on site, it would therefore require off-site compensation, which has not been provided as part of this development proposal. Such offsite compensation would represent a development cost, and it follows that minimising the loss of woodland would reduce the requirement for offsite compensation and the associated cost.

6.180 The argument that decked parking is ruled out on cost grounds cannot therefore be accepted. This argument is not supported by a relevant analysis of the cost factors involved, including extent of cut and fill/site works any off site biodiversity compensation. It is not concluded that significant harm in terms of loss of woodland priority habitat has been adequately mitigated nor compensated. The proposals are therefore in conflict with NPPF 118.

Archaeology

6.181 The residential layout proposed is fixed under this outline application and it includes building over the archaeological assets relating to the Soldier's Pillar monument. It is desirable that this area is retained as open space linked to the existing well-preserved barrow, which is a Scheduled Ancient Monument. It is considered that the proposal would fail to adequately protect heritage assets of national importance. This **harm is afforded less than significant weight** against the development.

Ancient woodland status

6.182 It is considered that the woodland is probably ancient woodland, but it is also acknowledged that this is not certain. Adopting a precautionary principle is reasonable and in this instance lends further importance to the need to minimise the loss of the woodland. This **harm is afforded significant weight**.

Overall Conclusion

6.183 The benefits arising from the re-provision of the improved hospital are clear and are afforded significant weight. In accordance with Paragraph 88 of the NPPF substantial weight should be afforded to the harm to the Green Belt. It is considered that such is the significance of the other harm in terms of loss of woodland priority habitat, harm that has not been adequately mitigated nor compensated for, contrary to NPPF guidance, that the scheme would require a 'very special circumstances' case. The case made has a fundamental weakness and is not therefore compelling.

6.184 The extent and nature of parking resulting in the loss woodland priority habitat is not justified. The proposed improvements to the retained woodland are not considered sufficient compensation for

the loss of woodland and harm caused to the priority habitat. The development as a whole is therefore considered unsustainable and contrary to planning policy because the harm is not clearly outweighed by other considerations and therefore 'very special circumstances' do not exist.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 7.1 In line with the Council's Charging Schedule the proposed development would now be CIL liable. The applicant has submitted the required forms including the assumption of liability for payment on the net increase in gross internal floor space. The required CIL payment for the proposed development would be £1,305,991.92. No further action is required until prior to commencement of the development if the proposal is subsequently approved.

8 CONSULTATIONS CARRIED OUT

Comments from interested parties

Approximately 150 neighbouring and local properties were notified directly of the application.

The application was advertised in the Maidenhead & Windsor Advertiser on 15th December '16.

The planning officer posted site notices advertising the application at the site on 19th December 2016

The application was subject further notification and publicity undertaken in June 2016, following receipt of amendments and further Environmental Information in the form of an addendum to the Environmental Statement in response to a Regulation 22 Notice issued by the Council under the EIA Regulations.

Approximately 100 representations were received in support of the application, summarised as:

Comment	Where in the report this is considered
1 The facility is desperately needed in this area	7.9, 7.173
2 The site has historically been a site providing healthcare for local residents.	7.9, 7.173
3 Will provide top quality care and negate the need to travel to Slough for care.	7.9, 7.173
3 Good location for public transport.	7.105 – 7.107
4 Sufficient / plenty parking should be provided.	7.99 – 7.104
5 Should not be refused over a few car parking spaces.	7.99 – 7.104, 7.177
6 Disagreement on parking should be balanced against need.	7.177 – 7.180
7 Oppose multi level parking.	Not proposed. This would need to be considered on its merits.
8 Positives outweigh negatives.	7.169 – 7.184
9 Significant social benefit to wider health economy	7.9 – 7.19, 7.173, 7.185
10 Loss of woodland acceptable and prevents loss elsewhere	7.41 – 7.43, 7.175 – 7.180
11 Need to maximise income to offset cost	7.141 – 7.143

A total of 23 representations were received objecting to the application, summarised as:

Comment	Where in the report this is considered
1 Impact on Green Belt	7.5 – 7.19, 7.171 – 7.180
No VSC case to justify	7.9 – 7.18, 7.171 – 7.181
2 Conflict with Neighbourhood Plan	7.33 – 7.37
3 Loss of trees and Woodland	7.38 – 7.65
4 Impact on wildlife	7.66 – 7.85
5 Insufficient mitigation	7.73 – 7.77
6 In conflict with Brook Av consent subject to retained	7.44, 7.73

	woodland.	
7	SANG not compatible with woodland	7.61, 7.66 – 7.67
8	No value to Ascot community.	7.9, 7.34
9	Absence of A&E	There is no A&E at existing hospital and this is not a material consideration.
10	GPs should be in central Ascot	7.32
11	Waste of public money on a temporary facility.	Note: the application has been amended and no longer proposes a temporary facility.
12	Should keep to existing site.	7.13 – 7.14
13	Enormous car park in woodland will be an eyesore	7.127
14	Traffic congestion	7.90 – 7.93
15	Cumulative impact	7.150
16	Inadequate parking	7.99 – 7.114
17	Impact on Brooke Av access	7.98
18	Noise and disturbance	7.134
19	Lack of infrastructure to support housing	7.126
20	Loss of privacy / overlooking	7.128
21	Loss of outlook to woodland / trees	7.127
22	High density out of character	7.125
23	5 story residential buildings too high /out of character	7.124
24	Insufficient green space	7.123 - 7.126
25	Will there be cycling?	7.107
26	Health Trust is scaremongering	

Statutory consultees

Comment		Where in the report this is considered
Natural England	SANG acceptable.	7.67
Environment Agency	Any infiltration of SUDS greater than 3m below ground level will generally not be acceptable. Need to meet 'Groundwater Protection: Principles and Practice (GP3)' document.	7.136 - 140
Highways England	No objection.	Highways considered at 7.90 – 7.110
Historic England	Recommend that an assessment be carried out of the impact that taller buildings might have on the monument's setting. The principle advisors to such a scheme would be the archaeological staff at Berkshire Archaeology.	7.158 It is considered that this assessment would be required at Reserved Matters. Archaeology considered at 7.111 – 7.118
Network Rail	No objection.	The woodland is retained abutting the railway.

Other consultees and organisations

Comment		Where in the report this is considered
Berkshire Archaeology		7.111 – 7.118
Local Lead Flood Authority	Further information requested.	7.140
RBWM – Highway Authority	No objection subject to conditions.	7.90 – 7.110

RBWM Ecologist	Objection	7.18 – 7.25
RBWM Tree officer	Objection	7.38 – 7.65
Neighbourhood Plan Delivery Group	<p>Support. The outstanding concerns centre on the need to ensure there is sufficient parking provided for both hospital and the admin hub (+ GP surgery).</p> <p>Concerns about the three large 5-storey blocks of flats along the northern boundary of the site.</p> <p>Concerns about the impact combined with all the other proposed development in the Ascot area on traffic congestion, do not believe that the relatively minor improvements being proposed to junctions and the Heatherwood roundabout sufficiently address the issue. Ascot needs a traffic masterplan, led by the Borough, with appropriate funding to deliver it.</p>	<p>7.99 – 7.114</p> <p>7.124</p> <p>7.90 – 7.93, 7.150</p> <p>Not a material consideration.</p>
RBWM Environmental Protection Officer	Recommend conditions relating to contamination, noise, lighting and dust management. Air quality assessment accepted.	Noted
RBWM Conservation Officer	No listed buildings are likely to be affected by the development proposal.	Noted
SPAE	<p>Hospital Object</p> <p><input type="checkbox"/> Congestion – more detail required</p> <p><input type="checkbox"/> Heatherwood roundabout provisions appear to be inadequate and do not consider the cumulative effect of significant developments on nearby sites. The Stuart Mitchell report clearly summarises this issue</p> <p><input type="checkbox"/> Inadequacy of the proposed parking Block 40 support - enables retention of a viable building, a smaller footprint on undeveloped Green Belt, retention of trees and a slightly lesser impact for Brooke Avenue residents</p> <p>Residential - Objection</p> <p><input type="checkbox"/> five-storey flats hard on the Ascot High Street to be unacceptable</p> <p>SANG - no objection</p>	<p>7.90 – 7.93, 7.150</p> <p>7.99 – 7.114 7.15</p> <p>7.124</p>
Sunninghill & Ascot Parish Council	<p>Objection</p> <ol style="list-style-type: none"> Hospital Location within the woodland greenbelt, contrary to NP/SS4.T the case for “very special circumstances” has not been strongly made. We are concerned at the proposal to locate the whole of the Trust’s administration on the site in block 40 We consider the parking provision for the health facilities is totally inadequate. There is no for overspill parking locations in the likely event of 	<p>7.33 – 7.37</p> <p>7.5 – 7.19, 7.171 – 7.174</p> <p>7.24 – 7.31</p> <p>7.99 – 7.114</p>

	<p>the demand exceeding supply.</p> <p>4. We are very concerned at the high percentage of the woodland taken up by the development (40%) and recommend that ways are sought to reduce this. For example by double decking the car parks.</p> <p>5. We have a number of objections in relation to the proposed housing.</p> <p>6. We have concerns re the location of two of the accesses.</p> <p>7. The Traffic Impact study doesn't take into account all the developments in the emerging LP and those expected along the London Road towards Bracknell, but only takes account of a very small number of committed developments.</p> <p>8. The SANG fails to provide parking. Size of the SANG exceeds that required.</p>	<p>7.178</p> <p>7.124 - 7.125</p> <p>7.94 – 7.98</p> <p>7.90 – 7.93, 7.150</p> <p>7.76</p>
Winkfield Parish Council	<p>Objection</p> <p>Agree with the objections of Ascot and Sunninghill Parish Council. WPC feels that insufficient infrastructure is provided to support the proposed development, particularly as regards educational facilities, parking and traffic movement.</p>	<p>7.126</p> <p>7.90 – 7.110</p>
Binfield Parish Council	<p>Support</p> <p>The Parish Council agree that the application sets out clear and Very Special Circumstances to support this proposal in the green belt and can clearly see evidence that the proposal aims to minimise the potential impact on the openness of the Green Belt whilst accepting that a fundamental matter is the much needed development of a modern, state of the art medical facility</p>	<p>7.5 – 7.23</p> <p>7.171 – 7.180</p>
The Heath Advisory Group (HAG)	<p>Support hospital.</p> <p>Concern expressed with aspects of the proposal:</p> <ul style="list-style-type: none"> <input type="checkbox"/> There should be affordable housing <input type="checkbox"/> Need staff housing <input type="checkbox"/> Not enough green space <input type="checkbox"/> Not enough parking – why not 2 levels? <input type="checkbox"/> Green Belt precedent <p>Questions raised regarding design and detail regarding:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Archaeology <input type="checkbox"/> Future proofing / extension <input type="checkbox"/> Transport plan <input type="checkbox"/> Would like to see tree audit <input type="checkbox"/> Will there be a pharmacy <input type="checkbox"/> Will there be a café <input type="checkbox"/> Are there solar panels / recycling 	<p>7.141 – 7.143</p> <p>7.126</p> <p>7.99 – 7.114</p> <p>7.5 – 7.19, 7.171 – 7.180</p> <p>The questions raised do not require a planning response.</p>

9 APPENDICES TO THIS REPORT

Appendix A - Site location plan

Appendix B – Site wide layout Phase 2

Appendix C - Residential illustrative masterplan

Appendix D - Hospital elevations x 2

Appendix E – Hospital sections

Appendix F – Site wide sections

Appendix G - Hospital floorplans

Appendix H – Block 40

Appendix I – SANG outline proposals plan

Appendix J – Residential masterplan illustrative layout

Appendix K – Residential parameter plans: Access and movement

Appendix L - Residential parameter plans: Scale

Appendix M - Residential parameter plans: Open Space

Appendix N - Trees to be removed plan

Appendix O - Woodland areas

This recommendation is made following careful consideration of all the issues raised through the application process and thorough discussion with the applicants. The Case Officer has sought solutions to these issues where possible to secure a development that improves the economic, social and environmental conditions of the area, in accordance with NPPF.

In this case despite solutions being identified to the issues these have not been taken up by the applicant and thus are not successfully resolved.

10 REASONS FOR REFUSAL

- 1 The proposed development is inappropriate development in the Green Belt and therefore by definition harmful. It will also reduce openness due to the scale and siting of the proposed development. The proposal would therefore result in substantial harm to the Green Belt and there are no 'Very Special Circumstances' to outweigh the substantial harm to the Green Belt and the other significant harm, which is identified below. The proposals are contrary to paragraphs 87, 88 and 89 of the National Planning Policy Framework (NPPF), the provisions of saved Policies GB1, GB2A and GB9 of the Royal Borough of Windsor and Maidenhead Local Plan (Incorporating Alterations adopted June 2003), to policy NP/SS4 of the Ascot, Sunninghill and Sunningdale Neighbourhood Plan (2014), and to emerging Borough Local Plan (Submission version 2017) policy SP5.
- 2 The proposed development will significantly reduce the woodland site, which is priority habitat. The extent of woodland and tree loss represents significant harm to biodiversity that has not

been adequately mitigated, nor compensated for, and is therefore contrary to paragraph 118 of the National Planning Policy Framework (NPPF), the provisions of saved Policies GB2B of the Royal Borough of Windsor and Maidenhead Local Plan (Incorporating Alterations adopted June 2003), to policy NP/EN2 and NP/EN4 of the Ascot, Sunninghill and Sunningdale Neighbourhood Plan (2014), and to emerging Borough Local Plan 2013-33 (Submission version 2017) policy NR2 and NR3.

- 3 The proposed development would result in the loss and the potential loss of trees, which are important landscape features and are covered by a Tree Preservation Order. Their loss would be harmful to the character and appearance of the area. The proposals will be contrary to Core Planning Principle Bullet Point 7 and paragraphs 61 and 118 of the National Planning Policy Framework and the provisions of saved policies DG1 and N6 of the Royal Borough of Windsor and Maidenhead Local Plan (Incorporating Alterations adopted June 2003), Policy NP/EN2 of the Hurley and Ascot, Sunninghill and Sunningdale Neighbourhood Plan (2014), and to emerging Borough Local Plan 2013-33 (Submission version 2017) policy NR2.
- 4 The proposed residential layout for which permission is sought would result in building over archaeological assets relating to the Soldier's Pillar monument, where it is desirable that this area is retained as open space linked to the existing well-preserved barrow which is a Scheduled Ancient Monument. The proposal would therefore fail to adequately safeguard heritage assets, which are considered significant, and of national importance. The proposals will be contrary to paragraphs 135 and 139 of the National Planning Policy Framework and the provisions of saved policies ARCH1, ARCH2 and ARCH3 of the Royal Borough of Windsor and Maidenhead Local Plan (Incorporating Alterations adopted June 2003) and to emerging Borough Local Plan 2013-33 (Submission version 2017) policy HE1.
- 5 The proposed development fails to minimise the land allocated to parking, resulting in the loss of important woodland that is priority habitat, and is in conflict with the objectives of the Royal Borough of Windsor and Maidenhead Parking Strategy 2004 and therefore Policy P4 of the Local Plan.

