

BOROUGHWIDE PLANNING PANEL

22 August 2017

Item: 2

Application No.:	16/03824/FULL
Location:	Heatherwood Hospital London Road Ascot SL5 8AA
Proposal:	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.
Applicant:	Frimley Health 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	

SUMMARY

- 1.1 The Frimley Park Hospital NHS Foundation Trust (FHFT) has applied for permission for change of use of the building Block 40 from hospital accommodation (Use Class D1) to offices (Use Class B1) and GP Practice (Use Class D1) with associated parking, landscaping, replacement roof top plant, external staircase, temporary car park and demolition of existing walkway.
- 1.2 The former acute mental health treatment building (now disused) is part of the existing Heatherwood Hospital, it will be refurbished to provide the proposed accommodation. The Trust currently provides healthcare services across three sites, at Frimley, Wexham Park and Heatherwood. The redevelopment project at Heatherwood provides an opportunity to centralize all administrative services in one location at Heatherwood and provide other staff support and primary care facilities in association with the redeveloped Heatherwood Hospital.
There is also a concurrent planning application 16/03825/FUL for enabling works.
- 1.4 The existing Heatherwood Hospital is on the western edge of Ascot in East Berkshire, bounded to the north by Ascot High Street, A329 and to the Northwest by Kings Ride, A322. To the south of the existing Hospital buildings is a steeply sloping woodland area, bounded to the south by the main railway line between Reading and London Waterloo.
- 1.5 This is a previously developed brownfield site located within the Green Belt. The re-use of the building is considered appropriate development in accordance with policy. The associated access road realignment and parking proposed at the building will result in the loss of trees and woodland, which is priority habitat. While the proposal brings benefits in terms of GP facilities, and it brings employment to the site, these and are not considered sufficient to outweigh the harm. The development as a whole is therefore considered unsustainable and contrary to planning policy.

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

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| 1 | 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 |
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	compensated for the harm.
2	The proposal would result in the loss of trees that 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.

2 REASON FOR PANEL DETERMINATION

The Borough wide implications of the proposal for healthcare warrant consideration and determination by the Panel alongside the other two applications on the site which are on the agenda.

3. **DESCRIPTION OF THE SITE AND ITS SURROUNDINGS**

3.1 The site comprises the existing Heatherwood Hospital building Block 40, the immediately surrounding land and the existing access road extending to Kings Ride including the woodland area to west of the access road bordering the hospital site boundary. A detached area of land at the Hospital main Gate 1 on the High Street is also included to accommodate parking provision. The combined site area is approximately 2 ha.

3.2 The land is within the Frimley Health NHS Foundation Trust ownership. The hospital site is on the western edge of Ascot in East Berkshire, bounded to the north by Ascot High Street, A329 and to the Northwest by Kings Ride, A322. To the south Block 40 is bound by woodland extending to the South West trains railway line. The western boundary of the site consists of deciduous woodland. Adjacent to the eastern boundary of Block 40 are private apartments and key worker / nurse residential accommodation along Brooke Avenue.

3.3 The building will be served by an access from Kings Ride and the detached parking area will be accessed from London Road.

3.4 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 and Ascot railway station is approximately 1.3km away. Key destinations from the station include London Waterloo, Reading and Guildford with between two and four trains per destinations per hour.

3.5 The existing building dates from the 1980s and is part single and part 2 storeys. The Hospital has been extensively developed over time since the 1920s. The site contains several other buildings in use and large expanses of hard standing, providing 469 formal car parking spaces.

3.6 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 1500-1100 BC.

3.7 The site is located within Flood Zone 1 with a low probability of flooding

4 BACKGROUND INFORMATION

Frimley Park Hospital NHS Foundation Trust (FHFT)

- 4.1 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.
- 4.2 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. Following a review of clinical services delivery, the Trust identified the need to redevelop Heatherwood Hospital to provide planned care in a location which offers convenient access for patients staff and visitors. A comprehensive site selection process for the elective care hospital and its supporting facilities was carried out in 2015 which assessed the suitability of a number of sites within the local area and concluded that the existing Heatherwood hospital site offered the most suitable location.
- 4.3 As part of this redevelopment the Trust has identified an opportunity to centralise administrative services in order to relieve pressure on the other two sites and allow space for improved clinical activities. Providing centralised collocated administrative teams will also allow greater efficiencies and utilization of space.
- 4.4 Whilst much of the existing estate is nearing the end of serviceable life – Block 40 (a former acute mental health facility – no longer in use) is a later building (1980s) with suitable footprint to allow remodeling internally to accommodate a change of use. The reconfiguration of the building will provide office space for c304 full time staff together with a staff restaurant (also available to the clinical staff in the new hospital), a centralised data centre and space for a GP Practice Hub. The new offices will accommodate c100 staff that are currently working on the Heatherwood site and early occupation of this building will release existing buildings on Heatherwood and the two other hospital sites.
- 4.5 The Trust is an important employer within the local area and the proposal will ensure employment opportunities in association with the Trust are retained on the existing Heatherwood Hospital site.

Planning application amendments

- 4.6 The planning application was originally made in December 2016. The application was formally amended through a submission made in late April 2017. Minor changes have been made to the parking layout adjacent to the building and additional information has been provided in relation to the tree loss and in the form of an Addendum to the Transport Assessment. The application as amended is considered in this report.

5 DESCRIPTION OF THE PROPOSAL AND RELEVANT PLANNING HISTORY

Planning History

- 5.1 There is no recent planning history relating to this existing building. Minor applications for extensions and alterations to existing buildings across the Heatherwood Hospital site have been undertaken. The notable applications are summarized in the table below.

Ref	Description	Decision and date
003/2017	TPO served to protect all the Woodland trees and subject to confirmation.	Served 13/02/2017
09/00390/F ULL	Consent for two modular buildings for use with the Hospital facilities	Permitted 03/03/2009
08/02283/F ULL	Revised siting of Block C5 (18 studio key worker units) retrospective amendment	Permitted 22/09/2008
06/00147/C PU	Use of Heatherwood House as 14 flats rather than present 18 flats through internal works	Permitted 23/01/2006
04/00708/F ULL	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

Concurrent related applications

5.2 There is a concurrent hybrid

5.3 There is a concurrent application for enabling works (16/03825/Full) in association with hybrid application (16/03115/Out) and change of use application (16/03824/FUL) for the redevelopment of Heatherwood Hospital. The works comprise site clearance, drainage diversions, services diversions, earthworks, construction of retaining walls, advanced planting and creation of balancing pond.

5.4 Both of these applications are subject to reports included on the Panel agenda.

Proposed Development

5.5 The application seeks a change of use of an existing building to offices with a new GP practice, data centre, office space for administration and a staff restaurant together with the reconfiguration of space surrounding the building to provide car parking, cycle parking and access.

5.6 The existing building comprises 5,101sqm of floorspace, which will remain. The building will be refurbished for the proposed uses. It is proposed 3,738sqm of floorspace will be refurbished and converted to office space for approximately 320 members of staff within the Frimley Health Trust. The staff using these offices will predominantly work in administration departments such as IT, Finance, Communications and Human Resources.

- 5.7 Approximately 700sqm of floorspace has been allocated for a new GP practice for 3 GPs. Each GP will have 3 consultant rooms therefore 9 consultant rooms will be provided.
- 5.8 The change of use will also provide 129sqm of space for a data centre and 411sqm for staff catering. Remaining space will be used for staff facilities such as WCs and an entrance lobby.
- 5.9 The proposal involves the realignment of the existing road to the west of Block 40 and the provision of a new vehicle turning space to allow access for service and delivery vehicles as well as parking for 46 vehicles.
- 5.10 Car parking for the use is also provided within a 99 space carpark in the vicinity of Gate 1. It is stated that 71 spaces will be allocated to the office use and a total of 27 car parking spaces will provided for the GP practice.

Quantum of development

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

Use	Maximum floorspace (Gross External Area) / numbers
Offices (Use Class B1a)	3,738 sqm
GP (Use Class D1)	700 sqm
Staff catering (B1 and D1)	411
Data centre (B1 and D1)	129
Ancillary (B1 and D1)	123
Car parking (office)	71
Car parking (GP)	27
Cycle parking	36
Motor cycles	5

More detailed description of application proposals

- 5.12 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.
- 5.13 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.
- 5.14 The 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.
- 5.15 The existing routes and pathways will be kept and upgraded where necessary. The proposals include a link from Block 40 to the proposed new hospital in the woodland to the south via 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.
- 5.16 Staff and visitor parking is provided adjacent to the building in a "dead end" parking arrangement. The 46 parking spaces are located to the north and west of the building's main entrance, off the drop-off zone. However the balance of 52 of the 98 allocated spaces serving the building, are located as part of the new car park within the hospital site at Gate 1 adjacent to Ascot High Street.
- 5.17 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. This road will also have a combination of DDA compliant accessible bays and regular parking spaces. Local resident's access routes will be maintained.
- 5.18 Pedestrian access to the building will be via the existing footpaths leading from the A332 Kings Ride and the High Street. Access through the existing hospital site is also available. 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.
- 5.19 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 to provide sensorial and visually stimulating, environments. The Design and Access Statement describes an approach to landscape as aiming to stitch the building's rectilinear forms into the forest and the topography to the south.

6 MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

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

National Planning Policy Framework (NPPF) 2012

6.2 At the heart of the NPPF is a presumption in favour of sustainable development. 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 56 Design of built environment
- Paragraph 60 Decisions should not stifle innovation, originality or initiative
- Paragraph 80 Purposes of the Green Belt
- Paragraph 89 Appropriate development in the Green Belt
- Paragraph 111 Reuse of brownfield land
- Paragraph 118 Aim to conserve and enhance biodiversity
- Paragraph 139 Non-designated heritage assets of archaeological interest
- Paragraph 188 Good quality pre-application discussions

Local Plan 1999

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

Green Belt	Design	Community facilities	Highways and Parking	Trees and Ecology	Heritage
GB1, GB2, GB8 and GB9	DG1	CF2	P4, T5 & T8	N6 N9	ARCH 1, 2, 3 & 4

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

6.4 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 Employment
- NP/EN2 Trees
- NP/EN4 Biodiversity
- NP/DG5 Energy efficiency and sustainability

NP/T1	Parking and Access
NP/T2	Cycle routes
NP/SS4	Heatherwood site

- 6.5 Supplementary planning documents adopted by the Council relevant to the proposal are:
- Planning Obligations and Developer Contributions 2014
 - The Interpretation of Policy NAP4 (Pollution of Groundwater and Surface Water) 2000
 - Sustainable Design and Construction 2009

More information on these documents can be found at:

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

Other Local Strategies or Publications

6.6 Other Strategies or publications relevant to the proposal are:

- 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

7 EXPLANATION OF RECOMMENDATION

7.1 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.

7.2 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.

7.3 The key considerations relate to the extent to which the proposed development is consistent with Development Plan Policies, taking into account the submitted application details, plans, technical studies, and other material considerations that weigh in the balance.

7.4 These policy and other considerations are set out and organised under the headings as follows:

- i. Green Belt policy
- ii. Town Centre, employment and community use policies
- iii. Site policy
- iv. Woodland and trees
- v. Ecology
- vi. Highways and parking
- vii. Drainage
- viii. Archaeology

ix. Planning Balance.

i. Green Belt policy

7.5 The fundamental aim of Green Belt policy, as set out in paragraph 79 of the NPPF, is to keep land permanently open. 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. Paragraph 90 of the NPPF states that other forms of development are also not inappropriate including *the re-use of buildings provided that the buildings are of permanent and construction*. Policy GB1 and GB 8 adopts a broadly similar approach to national policy. Policy GB 9 identifies the Heatherwood Hospital site as a major development site where development may be permitted.

7.6 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. The Heatherwood Hospital site (HA 32) is proposed to be removed from the Green Belt and is included as a site allocation for approximately 250 residential units in addition to retained health use. The emerging plan can only be afforded limited weight.

7.7 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.

7.8 Policy would allow reuse of existing buildings as appropriate development within the Green Belt and in this case the proposals would not conflict with the purposes of the Green Belt.

7.9 The proposed access road realignment encroaches into a strip of woodland outside of the developed hospital site. This woodland strip is also shown as retained Green Belt in the emerging Borough Local Plan (submission version 2017), Heatherwood Hospital site allocation (HA 32). The question arises as to whether this aspect of the development represents inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (NPPF 87).

7.10 As the road realignment is an engineering operation and does preserves the openness of the Green Belt and does not conflict with the purposes of including land in Green Belt, it can't necessarily be considered inappropriate development requiring a Very Special Circumstances justification. The resulting impact in terms of loss of woodland trees is considered below.

ii. Town Centre, employment and community facilities policies

Sequential test

7.11 **T**he Trust is seeking to provide a new administrative hub for its central services through co-location of departments currently operating over the three Trust sites

(Heatherwood, Wexham and Frimley) into a single '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.

7.12 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.*'

7.13 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 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

7.14 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 floorspace 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.*

7.15 An assessment has been submitted and it explains that one third of the proposed office space will have a neutral impact as these staff already work at Heatherwood and therefore the main impact should be considered in relation to the remaining two thirds of office space (approximately 2,000 sqm) where employees will be relocated from Wexham Park and Frimley Park sites. If the Trust were proposing a building solely for the relocation of staff at Wexham Park and Frimley Park Hospitals, a sequential test or impact assessment would not be required as the required floorspace 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.

7.16 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 sequential test for the office uses and no available office space within Ascot centre was identified. As a consequence the proposal will not draw any employees out of Ascot centre to the proposed site.

7.17 Furthermore as the proposal seeks to relocate existing staff from within the Trust, it 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.

7.18 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 health service related 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.

Employment

7.19 The proposal will ensure the retention of existing employment floorspace in the area in line with Policy NP/E1.2 of the Neighbourhood Plan. The proposal therefore adheres to planning employment policy by encouraging economic growth of an existing employment provider within the area.

GP surgeries

7.20 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. 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.

7.21 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. It is explained that in the long term, the proposal will sit within a mixed use site when the Heatherwood site is fully redeveloped to include an elective care hospital, residential and office space, and therefore the provision of a GP practice in this location would adhere to planning policy.

7.22 Notwithstanding that the application is a stand alone proposal, it is considered that given the edge of centre location, the existence of this use on the current site and the benefits derived from proximity to the hospital, that this would not be detrimental to the vitality of the town centre or otherwise an unacceptable use.

iii. Site policy

7.23 The Neighbourhood Plan Policy NP/SS4 identifies Heatherwood Hospital as a major development site in the Green Belt. 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. 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'.

7.24 The proposals for reuse of the redundant hospital building on part of the site do not fully engage the policy, which addresses redevelopment of the whole site. Furthermore it is not considered that the reuse of the building is necessarily in conflict with the site policy and would not preclude redevelopment of the remainder of the site as envisaged by the policy.

7.25 The key consideration relates to the impact of the proposed access road realignment that encroaches into a strip of woodland outside of the designated site. This woodland strip is also shown as retained Green Belt in the emerging Borough Local Plan (submission version 2017), Heatherwood Hospital site allocation (HA 32).

iv. Woodland and trees

7.26 The conversion of the building does not have implications for the woodland and trees, but the realigned access road and additional parking will. The main access driveway is to be relocated further to the west that will take up part of the woodland. This woodland is subject to a S.106 Planning Agreement securing a management plan, is recorded as a priority habitat and may also be ancient (disputed by the applicant). Further details on these designations have been provided in detail within the report on the hybrid application 16/03115/Out and pertinent points are set out below.

7.27 The additional parking between the building and access road will result in loss of trees, these are outside the woodland, but nevertheless do contribute to the sylvan character of the area. The loss of a significant number of trees within the site would be detrimental and cause harm to the amenity and landscape character of the area.

BAP status

7.28 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. The impact on the priority habitat is considered further in the Ecology section below.

Previous planning consent and woodland management plan

7.29 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

7.30 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 and 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.

7.31 A woodland management plan was agreed and a review is now overdue and this has been brought to the attention of the applicant. The mitigation (management of woodland) is required to last for the lifetime of the development. The proposal is in conflict with the obligations as it shows the removal of a portion of this woodland.

7.32 Given the loss of woodland and loss of other trees, the proposal fails to comply with policies DG1 and N6.

v. Ecology

Priority Habitat

7.33 The realigned access road and car parking is located within the woodland to the west of the developed site. The woodland is listed as lowland mixed deciduous woodland, which is a priority habitat. This type of woodland grows on all kinds of soils, and includes most semi-natural woodland in southern and eastern England. Many are ancient woods, which have been continuously wooded since the 17th century.

7.34 Priority habitats are all habitats listed in Section 41 as being Habitats of Principal Importance for the Conservation of Biodiversity in England as required under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006. Priority habitats are further 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'*.

7.35 The NPPF at paragraph 118 states: *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.*

7.36 No assessment on the impacts to the priority habitat from the proposed development has been undertaken for this application. The concurrent application 16/03115 does include an assessment within an Addendum to the Environmental Statement, relating to the whole woodland area but this does not specifically address the development the subject of this application. The mitigation proposed for that development is in the context of a proposed SANG but this is not part of the proposal the subject of this application so cannot be considered material.

7.37 The proposed development will result in the loss of part of the priority habitat without any appropriate mitigation or compensation. This is contrary to the NERC Act and the NPPF.

Biodiversity Enhancements

7.38 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".* 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". In addition, 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". No proposals for biodiversity enhancements are proposed.

Bats

7.39 Building 40 was subject to a detailed inspection and it was concluded that the building was in good condition. No evidence of any bats was recorded during the internal and external inspections of any buildings on site or during the emergence or return to roost surveys.

Breeding Birds

7.40 The site offers good opportunities for nesting birds in the form of trees, scrub and amenity planting. 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.

Invertebrates

7.41 The woodland offers opportunities for stag beetles and a number of records of stag beetles have been recorded within 1km of the proposed development site. No evidence of stag beetles was recorded during the ecology survey.

Hedgehogs

7.42 The vegetation on site could provide opportunities for hedgehog and records of hedgehog 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". A precautionary approach should be undertaken during clearance of vegetation including the hand clearance of possible hibernation sites outside the hibernation period (which is between November and March inclusive) in order to avoid killing or injuring hedgehogs.

vi. Highways and parking

7.43 A Transport Assessment (TA) has been provided. An addendum to the TA has been submitted but it is noted that this addresses the concurrent application 16/03115 and does not provide any specific additional information addressing the proposals the subject of this application.

7.44 It is estimated that around 320 existing Trust employees will work in the woodland offices, of which a third (107) are currently based at Heatherwood Hospital. The remaining 213 staff will be relocating from Wexham Park Hospital and Frimley Park Hospital.

Parking

7.45 There are currently 469 parking spaces across the hospital site and it is assumed that 50 spaces would have been associated with the previous mental health facility use of Block 40. A parking survey undertaken shows that occupancy is between 40.7% and 82.9% with 80 free spaces at the peak of occupancy.

7.46 The parking requirement is assessed in accordance with RBWM Parking Standards (2004), as shown in the table below. However as a third of the trips are already travelling to the site, a third of the required spaces are already accounted for within the existing Hospital provision. Therefore 98 additional spaces are required. The proposal is to utilize the spare parking capacity within the hospital and provide an additional 24 spaces by rationalising existing spaces.

<u>Development</u>	<u>Parking Standard - Number of Spaces</u>		<u>Factoring in existing staff</u>
<u>GP 9 consulting rooms</u>	<u>3 spaces per room</u>	<u>27</u>	<u>27</u>
<u>3,738 sq m office (Use Class B1)</u>	<u>1 space per 35 sqm</u>	<u>107</u>	<u>71</u>
	<u>Total</u>	<u>134</u>	<u>98</u>

Traffic impacts

7.47 The office use would generate 122 and 80 two way vehicle movements to the hospital in the AM and PM peak hours respectively although taking into account the third of all staff currently based on site the actual additional movements are 81 and 53 movements respectively. It is assessed that the GP use would generate 25 and 23 two-way vehicle movements to the hospital during the AM and PM peaks. The total combined additional trip generation is therefore 106 and 76 two-way vehicle movements in the AM and PM peak hours respectively.

7.48 The TA advises that the impacts of the development flows on junctions within the highway network are minimal. It is also noted that the existing building and other disused buildings within Heatherwood Hospital could be refurbished and put into hospital use that could generate trips. This would be without the need for permission.

7.49 It is proposed that the development is included within the hospital's Travel Plan going forward. The Travel Plan helps manage accessibility and to promote sustainable travel and to reduce where practicable single occupancy private car trips.

Access and servicing

7.50 Delivery and servicing for the proposed development will be via the main entrance along the northern side of the woodland offices, which is accessed from Kings Ride. A new road alignment and turning head is provided to facilitate this.

7.51 The access to Brooke Avenue is to be maintained.

Public transport and cycle provision

7.52 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.

7.53 A total of 36 cycle parking spaces will serve the proposed development, in accordance with standards.

Conclusion

7.54 There is no objection to the proposals on highways and parking grounds.

vii. Drainage

7.55 The existing Block 40 building will be refurbished and the existing drainage points will be utilised. The new external works however introduces a new car parking area, a new turnaround area and several new external paved areas. The existing hard standing areas around the existing Block 40 totals 2855m², whilst the new external scheme increases the total hard standing area to 4810 m². In order to deal with this increase in hard standing, it is proposed to install permeable surfacing where possible. By making these areas permeable, the total impermeable area becomes less than the existing situation, consequently offering a betterment.

7.56 As the turnaround area and access road realignment will require an asphalt construction and with a betterment already being achieved in terms of impermeable area, it is proposed to drain these areas by using a series of gullies. These gullies will connect back to the existing surface water drainage system. The area of the proposed turnaround is currently hard standing, a combination of an existing building and an ambulance parking zone. This area currently drains back to the existing main surface water network and the new turnaround area will seek to replicate this. The access road realignment is currently a mixture of soft and hard areas. As a betterment is achieved overall, the flow rates will not increase back to the existing surface water network, even though the access road realignment will replace some permeable area.

7.57 There is no objection to the proposals on drainage.

viii. Archaeology

7.58 Paragraph 141 of the NPPF which 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'*.

7.59 Outside of the footprint of the existing building it is proposed to create a turning circle for vehicles and to create a new road layout and car parking spaces to the west of the existing building. A Bronze Age (2,000 – 800 BC) round barrow survives within the existing Hospital site, which is designated as a nationally important Scheduled Monument. This barrow was only one of four, collectively comprising an important barrow cemetery within and in close proximity to Heatherwood Hospital. One of these barrows, notated as Soldier's Pillar on historic mapping, has been identified by the applicant's consultant (TVAS) in exploratory archaeological investigations in connection with the concurrent application 16/03115/Out. The monument is represented by a ditch that would have encircled the mound and lays some 35m east of the proposed turning circle.

7.60 Berkshire Archaeology recommend that in the current absence of detailed knowledge on the nature of below ground conditions across the Hospital site and the possible presence of potentially significant buried remains beyond the Scheduled Monument, that as a precaution, archaeological monitoring is undertaken during those works that might impact on buried remains. This could be secured by planning condition to any approval.

ix. Planning balance

7.61 In accordance with the NPPF the reuse of a redundant building can be considered appropriate development within the Green Belt. The NPPF also states that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Therefore the main issue is whether the harm by reason of loss of trees and woodland is clearly outweighed by other considerations.

7.62 The development brings employment to the area and there are benefits to the community through the provision of the GP facilities. However it is apparent that the loss of woodland would be avoided by maintaining the existing road layout. It is acknowledged that this would conflict with the parking proposals, which proposes 23 spaces between the building and the realigned road. Far fewer than this number would be achieved within the existing road layout. However it is clear that the parking required for the GP use (27 spaces) could still be maintained at the building while the impact on office parking could be mitigated by the availability of spaces within the proposed carpark at Gate 1.

7.63 It is considered that the woodland is likely 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 avoid the loss of the woodland.

7.64 The proposals include a road realignment and parking arrangement resulting in the loss of woodland that is priority habitat. This is not justified and should be avoided in accordance with policy. No adequate mitigation or compensation proposals have been made. While the proposal brings benefits in terms of GP facilities, and it brings employment to the site, these are not considered sufficient to outweigh the harm and policy presumption that permission should be refused. The development as a whole is therefore considered unsustainable and contrary to planning policy.

8 COMMUNITY INFRASTRUCTURE LEVY (CIL)

8.1 The proposal is not CIL liable.

9 CONSULTATIONS CARRIED OUT

Comments from interested parties

A total of 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 information. One representation was received in support of the application, summarised as:

Comment	Where in the report this is considered
1 The facility is needed in this area	7.18

A total of 7 individuals have made objections to the application, summarised as:

Comment	Where in the report this is considered
1 Loss of trees	7.26 – 7.32
2 Loss of screening to Brooke Avenue	7.27
3 Smells, noise and disturbance	Requirements could be secured by condition to any approval.
4 Insufficient parking	7.43 – 7.54
5 Traffic impacts	7.43 – 7.54
6 Not needed, office building could be anywhere	7.11 – 7.19

Statutory consultees

Comment	Where in the report this is considered
Natural England	No objection. Ecology considered at 7.33 – 7.42
Highways England	No objection. Highways issues at 7.43 – 7.54
Historic England	No objection. 7.58 – 7.60
Network Rail	No objection. The site is not adjacent to the railway.

Other consultees and organisations

Comment	Where in the report this is considered
Berkshire Archaeology	Condition securing archaeological monitoring recommended. 7.58 – 7.60
Local Lead Flood Authority	Further information requested. 7.55 – 7.57
RBWM – Highway Authority	Substantive comments have been made in respect of 16/03115. No objection. 7.43 – 7.54
RBWM Ecologist	Objection 7.33 – 7.42
RBWM Tree officer	Objection 7.26 – 7.32
RBWM Environmental Protection Officer	Recommend conditions relating to contamination, noise, lighting and dust management. Air quality assessment accepted. Noted

Sunninghill & Ascot Parish Council	<p>Parish is concerned that expenditure of some millions of pound on the refurbishment when the Hospital is planning to build a new Admin block in the foreseeable future is potentially a misuse of public funds.</p> <p>The committee also objected on the grounds of inadequate parking and asked for a more detailed travel plan that provides some clarity on how staff currently employed at Wexham and Frimley will travel to Ascot and the quantum of parking that they will need/use. Also the adequacy of parking for the GP practice requires clarification. The Committee is also concerned about routing of construction traffic should the application for a new hospital be approved. This traffic would use the same access as patients to the GP Practice and the Residents of Brook Avenue and a workable plan that describes how the interaction of construction traffic with patients at the GP Practice and residents of Brook Avenue will be managed without inconveniencing the latter. Due to the age of the property that is proposed for demolition to make way for parking on the northern boundary a bat survey is required.</p>	<p>The nee Admin block has been removed from the application 16/03115.</p> <p>7.43 – 7.54</p> <p>A requirement to agree such details as part of a CEMP would be secured by condition to any approval.</p> <p>7.39</p>
Bracknell Forest Council	<p>The enabling works Construction Management Plan refers to a Park & Ride being established to avoid the need for contractor parking to take place within the hospital site. No details of where this facility will be located have been provided and it is considered that this is required to enable Bracknell Forest to fully take into account any impact of the proposal on the local highway network.</p>	<p>A requirement to agree such details as part of a CEMP would be secured by condition to any approval.</p>
Runnymede BC	<p>No objection</p>	<p>Noted</p>

10 APPENDICES TO THIS REPORT

Appendix A - Site location plan

Appendix B – Site wide layout

Appendix C – General arrangement level 0

Appendix D - General arrangement level 1

Appendix E - General arrangement level 2

Appendix F - General arrangement roof plan

Appendix G – Elevations

Appendix H - Sections

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 the issues have not been successfully resolved.

1 The proposed development will result in the loss of woodland that 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

2 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.