

# Glan Clywd Hospital: Adult and Older Persons Mental Health Unit and Car Park Development

**Planning Statement** 

Client: The Betsi Cadwaladr University Health Board and

**BAM Construction** 

February 2023







# **Document control**

Document:	Planning Statement
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Client:	Betsi Cadwaladr University Health Board and BAM Construction
Job Number:	784-B031165
Issue:	V1.0 – Consultation Version – 01.02.2023

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## 1 Introduction

## 1.1 **Scope and Purpose**

1.1.1 This Planning Statement is prepared by Tetra Tech on behalf of the Betsi Cadwaladr University Health Board (BCUHB, the applicant), working in partnership with BAM Construction (the appointed contractor), in support of a planning application for the development of a replacement mental health hospital unit at Glan Clwyd Hospital alongside a new multi-storey car park to serve the hospital.

## 1.2 **Development Proposals Summary**

- 1.2.1 The development proposals presented are for a new part 2-storey and part 3-storey hospital building. The new building would be built on an existing surface car park located in the north-western corner of the hospital campus. The new building would provide a replacement facility for the existing Ablett Unit at the hospital, providing a new inpatient adult mental health unit. The facility would provide 59 patient beds within a new modern, purpose-built facility.
- 1.2.2 The existing Ablett Unit buildings on the hospital campus would be retained to be re-purposed at a future time to accommodate some alternative hospital administrative functions which are presently accommodated elsewhere within the hospital.
- 1.2.3 A new multi-storey car park is proposed to be developed in the north-eastern corner of the hospital campus, utilising an area of existing surface car parking which serves the hospital in this location. The car park would provide three levels of parking, (ground and two upper levels), delivering replacement car parking provision for the spaces displaced in building the new mental health unit.
- 1.2.4 This Statement provides details of the proposed scheme and includes an assessment of the proposed development against the relevant planning policy framework.

## 1.3 Application Documents

- 1.3.1 This Statement should be read alongside the following plans and documents submitted in support of the application:
  - Completed Application Forms and Certificates;
  - Application Drawings;
  - Design & Access Statement;
  - Transport Assessment;

- Community and Linguistic Impact Assessment;
- Arboricultural Impact Assessment;
- Ecology Assessment;
- Drainage Strategy Statement;
- Noise Impact Assessment;
- Topographical Survey;
- Site Investigations Report and
- Water Conservation Statement.

## 1.4 **Structure of Report**

- 1.4.1 The remainder of this report is structured as follows:
  - Section 2 outlines the background to the proposals and the rationale behind the planning application;
  - Section 3 describes the existing site context;
  - Section 4 provides details of the development proposals;
  - Section 5 provides the planning history for the site and proposals;
  - **Section 6** identifies the development plan and national planning policies of relevance to the planning application;
  - Section 7 considers the proposal's compliance with national and local planning policy;
  - Section 8 provides a summary of conclusions.

# 2 Background

- 2.1.1 Betsi Cadwaladr University Health Board as applicant are seeking to bring forward development proposals within their Glan Clwyd Hospital campus to deliver a new mental health inpatient facility.
- 2.1.2 This planning application is being brought forward as part of the Health Board's process to establish the full business case for the proposed new hospital unit and in turn to secure final funding approval from Welsh Government.
- 2.1.3 Dedicated mental health care at the hospital is currently provided at the Ablett Unit which is accommodated in a series of connected buildings at the southern end of the hospital campus. The existing Ablett Unit buildings are now approaching 30 years old, having opened in the mid-1990s. The proposed new unit would replace both the Ablett Unit and the Older People's Mental Health inpatient facility at Bryn Hesketh, Colwyn Bay. A number of long-standing issues with these existing facilities currently impacts upon the Health Board's ability to provide the best possible mental health care for its patients.
- 2.1.4 The new facility represents part of a wider planned transformation of mental health service provision and forms a key component of the Health Board's strategy for mental health provision in North Wales. The new facility would provide a significantly improved, modern facility, which would enable staff to deliver improved levels of care. The new building would accommodate all the existing care and support services which are presently provided at the existing facilities. The proposed new building would provide new acute mental health beds, necessary for the Health Board to meet current and projected future demand, in turn ensuring that more people from the Conwy and Denbighshire area are able to receive the care they need closer to home.
- 2.1.5 The new mental health unit is proposed to be located on an area of existing surface car parking in the north-western corner of the hospital campus. To address the displacement of existing car parking spaces resultant from accommodating the new hospital building, a new multi-storey car park is proposed to provide suitable replacement car parking provision for the hospital. A number of accessible car parking spaces will be provided alongside the new hospital unit.
- 2.1.6 An outline planning application (ref.40/2020/0813) was previously submitted to Denbighshire County Council (the 'Council') in October 2020 which proposed a new mental health unit in a different location within the hospital campus to that now proposed under this current application. The previous application proposed for the new building to be developed in the south-western corner of the hospital campus. This previous application was refused by the Council's Planning Committee in January 2021 due to concerns the proposed location would impact some directly neighbouring residents and their amenity. The concerns raised have been

- taken on board and addressed through relocating the proposed hospital building to a new location in the north-western corner of the hospital campus, well away from any neighbouring residential properties.
- 2.1.7 The existing Ablett Unit buildings are identified to be retained in their existing form, and therefore do not form part of the application proposals. Staff working at the existing Ablett Unit would relocate to the new building upon completion.
- 2.1.8 Following the opening of the new facility, and the decant of all existing patient services to the new building, the old Ablett Unit buildings would be re-purposed to accommodate some administrative services already currently located elsewhere within the hospital campus. The buildings have also been identified to potentially provide a central archive for patient records for the hospital.
- 2.1.9 The appointed development partner for the scheme is BAM Construction. Subject to receiving planning permission and funding approval, the development proposals would be scheduled to commence in spring 2024 with completion in 2026.

## **3** Site Context

## 3.1 **Site Description**

- 3.1.1 The Glan Clywd Hospital campus in its entirety extends to approximately 18 hectares, located on the northern side of Bodelwyddan. Vehicle access to the hospital campus is available from two access points from Rhuddlan Road, the southern access point being provided from a three-arm roundabout junction.
- 3.1.2 The hospital is primarily formed of a series of connected buildings sited centrally within the campus. A number of surface car parks which support the hospital are located on outlying parts of the campus, as are a number of supporting buildings. An access road encircles the main hospital complex, from which access to the various hospital buildings and car parks is provided.
- 3.1.3 The planning application proposes development on two parcels of land within the hospital campus, one representing the proposed site for the new mental health unit and the other the location for the proposed multi-storey car park.
- 3.1.4 The key development areas are identified below.

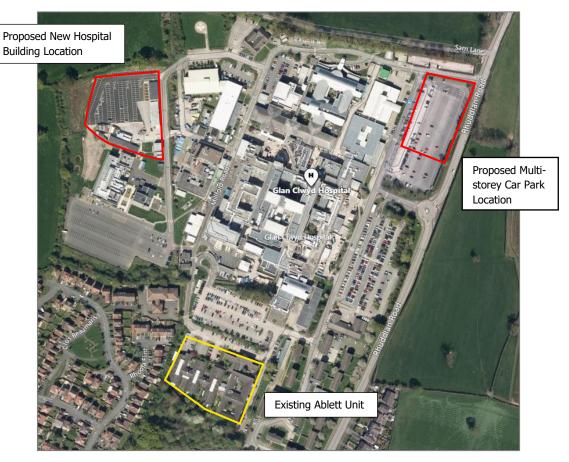


Figure 1: Application Site

- 3.1.5 The proposed new hospital building would provide a standalone facility, separated from the main hospital complex. The site is located in the north-western corner of the hospital campus and would principally entail developing upon an area of existing surface car parking (Car Park P5) which presently provides approximately 244 car parking spaces. A series of temporary office portacabins are also located on the site. The existing car park is reached via the internal access road which connects the plot to Rhuddlan Road.
- 3.1.6 The main hospital complex is sited directly to the east of the site for the new building. The main hospital complex is formed of a number of connected buildings of varying heights, the tallest of which being 5-storeys in height. To the south of the site for the new building is the Pathology Department and the Mortuary and Bereavement Centre. To the west and north of the site are open agricultural fields. The western and northern boundaries are lined with vegetation and established trees which serve to partly screen this part of the hospital campus site from views from the west and north. A small drainage feature is located to the west of the site, close to the western boundary, within the hospital's land ownership.
- 3.1.7 The proposed multi-storey car park would be sited in the north-eastern corner of the hospital campus, adjacent to Rhuddlan Road to the south of the northern vehicle access into the hospital campus. The new multi-storey car park would span across just over half of the existing surface car parking area in this locality (Car Park P3).
- 3.1.8 For context, the existing Ablett Unit is located to the south of the main hospital building complex and at the southern end of the hospital campus.
- 3.1.9 In the wider area, land to the north, east and west of the hospital comprise of open fields which are in agricultural use. The area to the south is characterised by low density residential dwellings which form part of the Bodelwyddan urban area. To the north of the hospital is the Faenol Fawr Country House and Manor Hotel complex. The Faenol Fawr building is a grade II\* listed building.
- 3.1.10 Rhuddlan Road and Bodelwyddan as a whole are accessible from junction 25 of the A55 (the North Wales Expressway), which represents a principal highway connecting settlements across Denbighshire and further afield within North Wales.
- 3.1.11 The application site is not subject to any Tree Preservation Orders. The closest Tree Preservation Order to the application site covers trees located along part the northern boundary line of the hospital campus alongside the access road to the Faenol Fawr Hotel.
- 3.1.12 No part of the hospital campus is located within a Conservation Area. The Bodelwyddan Conservation Area is found to the south of the hospital, encompassing historic properties at the southern end of Rhuddlan Road.

# 4 The Proposed Development

## 4.1 **Description**

- 4.1.1 The description of development for the proposals is as follows;
- 4.1.2 *`Erection of new hospital unit (Use Class C2) alongside associated landscaping, car parking and site vehicular access and the erection of a multi-storey car park with associated works'.*
- 4.1.3 A summary of the development proposals is provided below;

#### 4.2 **New Mental Health Unit**

- 4.2.1 The proposals are for a new specialist inpatient mental health care unit which would replace the existing Ablett Unit at the hospital. The aspiration is to deliver a world class facility which will provide excellence in local, regional and national mental health services. The project represents a flagship scheme for mental health care, representing a significant investment of up to £84.5million funded through the Welsh Government.
- 4.2.2 The facility would provide 59 patient beds within a new modern, purpose-built facility. The design proposals show a single building comprising of two main interconnected blocks, built around a central courtyard space. The design proposals incorporate a main eastern entrance block of 3-storeys in height, with a connected western block stepping down to 2-storeys in height. In total the building would provide an internal area of 9,794 sq.m (GIA).
- 4.2.3 The central courtyard and surrounding outdoor grounds would be utilised to provide safe and secure outdoor amenity and therapy spaces for patients. This would include providing a series of patient garden spaces. The building's orientation would allow patients beneficial views across the surrounding open countryside to the north and west.
- 4.2.4 The new building would principally provide 4 new inpatient wards, these being two Adult Acute Wards and 2 Older Persons Wards. The facility needs to provide overnight accommodation for its patients, potentially for extended stays. The building is therefore designed to provided individual rooms for all patients.
- 4.2.5 The new unit would delivery significantly improved facilities and environments specifically designed to support patient recovery. An array of complementary support facilities would be provided to include; therapy rooms, social spaces, gym rooms, visitor facilities, a welcoming reception space with café and a designated staff administration floor.



Figure 2: Ground Floor Plan Layout

- 4.2.6 The ground floor would accommodate the reception and visitor facilities as well as the Older Persons Wards for ease of access for these patients. A series of separate garden spaces are accessed from the ground floor space. Therapy spaces are split across the ground and first floors, with the Adult Acute Wards being on the first floor. The second floor is dedicated to staff office accommodation. Plant rooms are positioned on the roofs of the two main blocks which would be accessed by a stair core which runs the whole height of the building.
- 4.2.7 An appropriate soft landscaping scheme would be incorporated across the site, including new planting within the entrance plaza and garden spaces.
- 4.2.8 Dedicated delivery vehicle access and building services equipment are screened to the south of the entrance plaza, using a dedicated energy centre wing.
- 4.2.9 As mentioned, the new building would be built upon an existing area of surface car parking in the north-western corner of the hospital campus. A number of temporary office portacabins

- currently in situ on the site would be removed.
- 4.2.10 This application effectively represents revised proposals from those previously refused under application ref.40/2020/0813 in January 2021. The concerns of residents associated to the previous application have been comprehensively addressed through utilising an entirely different location for the development, now circa 185m from the closest neighbouring residential property, removing any potential residential amenity concerns.
- 4.2.11 The building would directly neighbour the hospital's 2-storey pathology building to the south and the hospital's estates management compound and associated buildings to the east.
- 4.2.12 To the west of the building is an existing drainage pond. The drainage pond would be retained in its current form and would continue to be used as a sustainable feature for surface water drainage at the site.
- 4.2.13 Staff based at the existing Ablett Unit would transfer to the new facility. A relatively small increase in the number of staff employed at the Ablett Unit is anticipated.
- 4.2.14 The building is seeking to maximise its sustainability potential. Photovoltaic panels are incorporated to the roof. The facility is targeting to achieve a BREEAM assessment rating of 'Excellent' through adopting sustainability measures and practices across the design.

## 4.3 **Existing Ablett Unit Buildings**

- 4.3.1 The existing Ablett Unit buildings would be retained on site, with no works proposed to the existing buildings. As mentioned, all staff working at the existing facility would transfer to working at the new facility.
- 4.3.2 The retention of the existing Ablett buildings would not result in a significant intensification of uses at the site. It is intended that the retained buildings would be used to accommodate some existing administrative functions and staff already currently located elsewhere within the hospital campus. In particular, existing hospital staff presently working from temporary portacabin buildings within the hospital campus would be able to relocate to more appropriate accommodation. The retained Ablett buildings have also been identified to potentially provide a central archive storage for patient records, with record stores transferred from other locations around the hospital.

# 4.4 Multi-Storey Car Park

4.4.1 A proposed multi-storey car park is included in the proposals to mitigate for the loss of existing parking spaces displaced by the development of the new mental health unit. The proposed multi-storey car park would stand on part of an existing area of surface car parking which serves the hospital in the north-eastern corner of the hospital campus, adjacent to Rhuddlan Road.

- 4.4.2 A three-level car park building is proposed, (ground, first and second floor levels). Existing ground level parking would largely be retained with the two upper levels of parking providing a net increase of circa 221 additional parking spaces. The multi-storey car park building's footprint would occupy approximately just over half of the existing area of surface car parking.
- 4.4.3 Overall car parking capacity at the hospital would remain comparable with the existing level of provision. In bringing together parking provision at one location, conveniently accessible for vehicle users at the entry into the hospital campus, parking arrangements would be significantly simplified. This will improve upon the existing parking arrangements where a significant proportion of the existing parking capacity is located at the back of the hospital site, which is not evidently obvious to drivers looking for a parking space. Focusing parking provision at the hospital entrance will also help to relieve vehicle congestion within the hospital campus which is known to have been a longstanding pressure which the Health Board have been working to improve through previous car park expansions.
- 4.4.4 The development of the new mental health unit would result in the loss of an existing car park in the north-western corner of the hospital campus which presently provides circa 244 spaces. A limited number of accessible spaces, (11no. in total) would be provided adjacent to the new mental health unit. When considering both development plots together, overall car parking capacity at the hospital would largely remain directly comparable to the existing level of provision.
- 4.4.5 The new car park would continue to use the existing vehicle access point from the hospital's internal access road within the campus (Sarn Lane). The access and egress points would require only minor modifications to ensure an appropriate design is implemented.

## 4.5 **Pre-Application Discussions**

- 4.5.1 Extended, ongoing pre-application engagement has been undertaken with the local planning authority in progressing the development proposals. Dialogue with Council Planning Officers has helped to inform the new proposed location for the mental health unit and to agree the requirements for the planning application.
- 4.5.2 As part of the pre-application stage discussions for the previous planning application submission in 2020 (ref.40/2020/0813) the potential for the proposals to require an Environmental Impact Assessment (EIA) or the need to progress an EIA Screening Opinion were raised. The Council did not require an EIA to support the development proposals at the time. The latest proposals remain of a comparable scale to the previous proposals in respect to the potential environmental impacts.
- 4.5.3 The proposals are located on previously developed land within the existing hospital campus and

will fundamentally replace the services of an existing patient facility on the site. The environmental impacts of the proposed development therefore are greatly limited. It is our professional judgement that the proposals would not constitute EIA development.

## 4.6 **Community Consultation**

- 4.6.1 In accordance with the requirements set out within the Town and Country Planning (Development Management Procedure) (Wales) (Amended) Order 2016, a Pre-Application Community Consultation has been undertaken.
- 4.6.2 A four-week consultation period commencing on 06/02/2023 and closing on 05/03/2023 is to be completed. In accordance with the statutory requirements, relevant community and 'specialist consultees' have been contacted and their comments requested. As part of this process, the development proposals have been made publicly available via a webpage hosted by the Betsi Cadwaladr University Health Board. Local residents within Bodelwyddan who reside within the vicinity of the hospital campus have been written to, in order to advise to them of the development proposals and the consultation taking place. In total circa 335 properties and landowners have been contacted directly.
- 4.6.3 A drop-in consultation event has also been arranged to provide opportunity for interested parties to view the proposals in person.
- 4.6.4 Key consultation material was made available in the Welsh Language to ensure an inclusive consultation for Welsh speakers.
- 4.6.5 Full details of the consultation undertaken will be provided within the Pre-application Consultation Statement Report provided in supporting of the planning application.

# **5** Planning History

## 5.1 Mental Health Unit Previous Application Proposals 2020/2021

- 5.1.1 This current application follows the refusal in January 2021 of an outline planning application (ref.40/2020/0813) which presented an earlier version of proposals for a replacement mental health unit which was proposed to be developed on a plot in the south-western corner of the hospital campus. The earlier proposals similarly also proposed providing a new multi-storey car park.
- 5.1.2 The latest proposals which are the subject of this application have been relocated and wholly revised to address the concerns raised with the earlier application and the reason for refusal.
- 5.1.3 The reason for refusal of application ref.40/2020/0813 was as follows;
- 5.1.4 "It is the opinion of the Local Planning Authority that the proposed parameters for the mental health building, by reason of the identified upper height limits and the proximity to neighbouring boundaries, would result in an unacceptable impact on residential amenity. As such the proposal is considered to be in conflict with Criteria i) and v) of Planning Policy RD1 of Denbighshire's adopted Local Development Plan."
- 5.1.5 The previous application proposed for the new mental health building to be located on an existing area of car parking in the south-western corner of the hospital campus. The decision cited the impact on residential amenity as the reason for refusal, reflective of neighbouring residential properties being located immediately to the south of the proposed location for the new hospital building.
- 5.1.6 The revised proposals which are the subject of this application have comprehensively addressed any previous concerns in respect to residential amenity through relocating the new building to a wholly different plot in the north-western corner of the hospital campus. The previously refused proposals would have provided a separating distance of approximately 21 metres between the new hospital building and the closest neighbouring residential property on the Ffordd Castell estate. The now proposed hospital building is circa 185 metres away from the closest residential property.
- 5.1.7 The revised proposals in providing 59 beds also seeks permission for a facility with a slightly reduced number of beds from the 64 bed unit which was originally proposed back in 2020/2021.
- 5.1.8 The multi-storey car park proposals have been retained within the current application proposals.

  The previous reason for refusal related solely to the proposed replacement mental health building, with no issues raised with the previous proposals for the multi-storey car park.

## 5.2 **Site History**

- 5.2.1 Glan Clwyd Hospital opened in 1980 and represents a major and strategically important health care facility which provides care for the residents of Denbighshire and the wider North Wales area. Planning permission for the Ablett Unit was granted in 1993. Significant developments at the hospital campus have seen the construction of the North Wales Cancer Treatment Centre which opened in 2000 and the Mortuary and Bereavement Centre which opened in 2013.
- 5.2.2 The Ablett Unit buildings have largely remained unchanged since being built. It is accepted by the Health Board that the existing facility is accommodated in ageing buildings and that the current premises have significant limitations which operationally impact upon how care and rehabilitation can be provided. Issues with the existing facility have been exacerbated during the COVID-19 pandemic. As such, significant investment to provide a modern and fit-for-purpose replacement facility is of key importance to the Health Board and for the future delivery of care.

## 5.3 **Planning Records**

- 5.3.1 Within the hospital campus there have been a multitude of planning permissions granted over the years, including for addition buildings and car parking provision. Details of planning applications over recent years with relevance to the current application proposals are identified below:
- 5.3.2 **Reference 2/BOD/0031/93/P**: This permission provided consent for the development of the existing Ablett Unit. Granted, April 1993.
- 5.3.3 **Reference 40/2008/1195:** 'Construction of a temporary car park and associated road access for staff use.' Granted, March 2009.
- 5.3.4 This permission relates to the construction of the 350 space surface car park in the southwestern corner of the hospital campus.
- 5.3.5 **Reference 40/2011/1157:** 'Erection of new pathology and bulk stores building, mortuary, energy centre and associated accesses, parking, service yards, landscaping, and drainage arrangements; and temporary contractors site huts and car parking (partly in retrospect).' Granted, November 2011.
- 5.3.6 **Reference 40/2015/1131:** 'Construction of additional car park'. Granted 29/03/2016.
- 5.3.7 This permission has been carried out and relates to the construction of a surface car park in the north-western part of the hospital campus. It is on this car park which the proposed new hospital building is now proposed to be built.
- 5.3.8 **Reference 40/2016/0109**: 'Continuation of use of temporary car park as a permanent car

- park'. Granted, 13/07/2016.
- 5.3.9 This permission relates to the permanent retention of the 350 space surface car park in the south-western corner of the hospital campus.
- 5.3.10 **Reference 40/2020/0813:** "Development of 2.8ha of land for the erection of a Use Class C2 hospital building (mental health unit to replace existing Ablett Unit) with associated landscaping, car parking and site vehicular access; and the erection of a multi-storey car park with associated works (outline application all matters reserved). Refused, 13/01/2021.
- 5.3.11 This application relates to previously refused proposals for a replacement mental health unit and new multi-storey car park, which have now been revised by this current application.

# **6 Planning Policy Overview**

6.1.1 In this section the key national and local planning policies and guidance of relevance to the proposals are outlined.

# **National Planning Policy**

# 6.2 Planning Policy Wales (PPW) Edition 11

- 6.2.1 PPW Edition 11, published in February 2021, establishes the land use policies of the Welsh Government.
- 6.2.2 Paragraph 1.18 confirms the presumption in favour of sustainable development applies, in accordance with the development plan, unless material considerations indicate otherwise to ensure that social, economic and environmental considerations are balanced and integrated.
- 6.2.3 In terms of managing developments, Paragraph 1.30 states this should be a positive and proactive process, led by the planning authority and working collaboratively with applicants and other stakeholders.
- 6.2.4 Paragraph 2.3 states that the planning systems should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly.
- 6.2.5 Paragraph 2.17 states that development proposals must seek to deliver developments which address the national sustainable placemaking outcomes. These are listed in Figure 5 of the document and are as follows:
  - Creating and sustaining communities through means such as delivering a mix of uses and also community facilities and services;
  - Growing the economy in a sustainable manner;
  - Making the best use of resources;
  - Maximising environmental protection and limiting environmental impact; and
  - Facilitating accessible and healthy environments.
- 6.2.6 Paragraph 3.3 states that good design is fundamental to creating sustainable places where people want to live, work and socialise. To achieve sustainable development, design must go beyond the aesthetics and include the social, economic, environmental and cultural aspects of the development. This also includes how space is used, how buildings and public realm support uses and their relationship with the surrounding area.

- 6.2.7 Paragraphs 3.5 and 3.6 state that good design is inclusive design and that development proposals must address issues of inclusivity and accessibility for all this includes making provision to meet the needs of people with sensory, memory, learning and mobility impairments.
- 6.2.8 Paragraph 3.25 sets out that the Welsh language is part of the social and cultural fabric, and that its future depends on a wide range of factors. The planning system should consider the conditions which are essential to the Welsh language and contribute to its use. Paragraph 3.29 notes that language impact assessments may be required for large scale developments.
- 6.2.9 Paragraph 3.50 seeks to promote a broad balance between housing, community facilities, services and employment opportunities in both rural and urban areas in order to minimise the need for long distance travelling. It also seeks to encourage uses which are major generators of travel (such as recreation uses, schools and other community facilities) within the existing urban area or areas which are, or can be, easily reached by walking and cycling, and are well served by public transport.
- 6.2.10 Paragraph 3.55 states that previously developed land should be used in preference to greenfield sites wherever possible. Within settlements, such land should generally be considered suitable or appropriate for development where its re-use will promote sustainability principles and any constraints can be overcome.
- 6.2.11 Paragraph 3.61 specifies that adequate infrastructure, including education and health facilities, are crucial for economic, social and environmental sustainability.
- 6.2.12 Paragraph 3.63 states that development should be located so it can be well serviced by existing or planned infrastructure.
- 6.2.13 Paragraph 4.02 notes the significance of community facilities and recreational spaces for people's health, wellbeing and quality of life and aims to protect and promote these uses in line with the overarching national sustainable placemaking objectives.
- 6.2.14 Paragraph 4.1.31 sets out that local planning authorities should ensure that new developments are fully accessible by active travel options.
- 6.2.15 Paragraph 4.1.41 identifies that the planning system should encourage and support the provision of Ultra Low Emission Vehicles, with paragraph 4.1.41 stating that the provision of electric vehicle charging points should be planned as part of the overall design of a development.
- 6.2.16 Paragraph 4.1.50 states that a design-led approach should be taken to the provision of car parking, which ensures an appropriate level of car parking is integrated in a way that does not dominate developments and which is informed by the local context. In respect to car parking Paragraph 4.1.52 goes on to indicate that parking standards should be applied flexibly.

- 6.2.17 Paragraph 4.4.1 notes that community facilities (which includes health services) contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often key in creating sustainable places.
- 6.2.18 Paragraph 4.4.2 specifies that, when determining proposals for community facilities, local planning authorities should consider the needs of communities and ensure that the proposals continue to address the needs and requirements of local residents.
- 6.2.19 Paragraph 5.8.1 identifies that the planning system should support new development that has very high energy performance.
- 6.2.20 Paragraph 6.1.5 states that the planning system must consider the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.
- 6.2.21 Paragraph 6.1.10 sets out that, with specific reference to Listed Buildings, there should be a general presumption in favour of their preservation and enhancement to both the building and its setting. For development proposals affecting a Listed Building, or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability to preserve the building, its special features and its setting.
- 6.2.22 Paragraph 6.1.14 states there should be a general presumption in favour of the preservation of the character or appearance of conservation areas or their settings.
- 6.2.23 Paragraph 6.4.5 considers biodiversity, indicating that developments should not cause any significant loss of habitat and must provide a net benefit for biodiversity.

#### 6.3 Future Wales: The National Plan 2040

- 6.3.1 Future Wales was published in February 2021 and provides Wales' National Development Framework, setting the direction for development in Wales to 2040. The framework is Wales' highest tier of development plan and is focused on issues at a national scale. Strategic and Local Development Plans are now required to be in conformity with Future Wales.
- 6.3.2 Policy 2 indicates that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives.
- 6.3.3 Policy 4 provides support for sustainable and vibrant rural communities. It indicates that Strategic and Local Development Plans should identify their rural communities and devise policies to support them based on their specific needs. These needs may include reversing depopulation, access to local services and ensuring employment opportunities.
- 6.3.4 Policy 5 provides support for sustainable, appropriate and proportionate economic growth in rural towns that is planned and managed through Strategic Local Development Plans.

- 6.3.5 Policy 9 identifies that planning proposals through their design should demonstrate action towards; securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets.
- 6.3.6 Policy 12 relates to regional connectivity. It states that active travel must be an essential and integral component of all new developments. Where car parking is provided for non-residential development, is it indicated that planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.
- 6.3.7 The policy goes on to identify that when requiring electric vehicle charging points, planning authorities should ensure the level, location and type of provision is appropriate to the scheme and local circumstances. It is further noted that it may be appropriate for some of the provision to be 'passive', with the necessary underlying infrastructure provided to enable installation and activation in the future.

#### 6.4 Technical Advice Notes

6.4.1 PPW and Future Wales are supplemented by a series of Technical Advice Notes (TANs) which provide more detailed guidance on a range of topics.

#### **TAN 5 – Nature Conservation and Planning (September 2009)**

6.4.2 The guidance provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The document sets out seven key principles of positive planning for nature conservation, including that the planning system in Wales should look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.

#### **TAN 11 – Noise (October 1997)**

6.4.3 Provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs or administrative burdens of business.

#### **TAN 12 – Design (March 2016)**

6.4.4 Provides advice on how 'promoting sustainability through good design' and 'planning for sustainable building' may be facilitated through the planning system.

#### TAN 15 – Development and Flood Risk (July 2004)

6.4.5 This TAN provides technical guidance and advice on development and flood risk as this relates to sustainability principles. It provides a framework within which risks arising from flooding, and from additional run-off from development, can be assessed.

#### TAN 18 - Transport (March 2007)

6.4.6 The document provides advice on transport matters when planning for new development and establishes 11 objectives in relation to planning for transport. These objectives include ensuring new development is located in areas that do, or will have, good access by public transport, walking and cycling in order to minimise the need for travel and to foster social inclusion.

#### TAN 20 – Planning and the Welsh Language (October 2017)

6.4.7 Provides advice on how the land use planning system can be used to consider, and if necessary, mitigate any effects of development on the Welsh language and the sustainability of Welsh language communities. It advises that in determining individual planning applications where the needs and interests of the Welsh language may be a material consideration, decisions must be based on planning grounds and be reasonable.

#### **TAN 24 – The Historic Environment (May 2017)**

6.4.8 Provides guidance on how the planning system considers the historic environment (including Conservation Areas and Listed Buildings) during the decision-making process. It sets out six principles of conservation, which should be used to assess the potential impacts of proposed developments on the historic environment.

## 6.5 Active Travel (Wales) Act 2013

6.5.1 The Active Travel (Wales) Act 2013 establishes walking and cycling as the preferred option for shorter travel journeys and seeks to facilitate improved opportunities for travel on foot and by bicycle. Denbighshire County Council have published a series of 'Integrated Network Maps' to identify suitable potential new routes or improvements where active travel can be promoted.

# Local Planning Policy

## 6.6 **Local Development Plan**

- 6.6.1 The Local Development Plan for the area comprises of the Denbighshire Local Development Plan (2006-2021) (the Local Plan), adopted in June 2013. The Council also have a series of adopted Supplementary Planning Guidance Notes (SPGs) which are material considerations in the determination of the planning application.
- 6.6.2 We are aware that the Council are in the process of developing a new local plan for the area, however no draft plan has been published for review at the time of writing.

## 6.7 **Denbighshire Local Plan**

6.7.1 Strategic objective 12 of the Local Plan relates to infrastructure and states that the plan will

- ensure an adequate level of physical and community infrastructure (e.g. primary care facilities, community facilities etc) will be provided alongside new developments.
- 6.7.2 Strategic objective 14 seeks to ensure that new developments are sustainable and are of a good quality of design, whilst ensuring flood risk is adequately taken into consideration.
- 6.7.3 In terms of general development policies, **Policy RD1** 'Sustainable Development and Good Standard Design' supports proposals within development boundaries providing they adhere to a series of criteria being met, which include;
  - Respecting the site and surroundings in terms of siting, layout, scale, form, character, design, intensity of use of land/buildings and the spaces around and between buildings;
  - Protecting and where possible enhancing the local natural and historic environment;
  - Does not unacceptably affect prominent public views into, out of or across any settlement or area of open countryside;
  - Incorporates existing landscape or other features and takes account of site contours and changes in levels;
  - Does not unacceptably impact the amenity of local residents, other land and property users;
  - Provides convenient access for all;
  - Does not have an unacceptable effect on the local highway network;
  - Does not prejudice land or buildings safeguarded for other uses; and
  - Incorporates suitable landscaping measures where appropriate.
- 6.7.4 **Policy RD5** infers that developments could be refused if their size, scale or location would cause significant harm to the character and language balance of a community. It requires developments greater than 1,000 sq.m in size to be accompanied by a Community Linguistic Statement. Developments greater than 3,000 sq.m, or large scale infrastructure projects with long term community impacts, are required to be accompanied by a more detailed 'Community and Linguistic Impact Assessment'.
- 6.7.5 **Policy BSC 1** outlines the 'Growth Strategy for Denbighshire'. The policy states that the Development Plan will make provision for approximately 7,500 new homes over the plan period up to 2021. The Policy justification notes that the new key strategic site at Bodelwyddan will be developed for mixed use purposes, and will accommodate up to 1,000 new homes, employment opportunities, community facilities and open space.
- 6.7.6 **Policy BSC 3** expects, where appropriate, for developments to contribute to the provision of infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from development. The priorities for contributions will vary depending on the location and nature of development.

- 6.7.7 **Policy BSC 5** relates to the Bodelwyddan Strategic site and states that the site will accommodate a significant amount of development, which is intended to be an exemplar site in terms of sustainability and design. Key aspects of the development include; development of 1,715 dwellings with affordable housing provision; 26 hectares of employment land; new highways between the existing A55 Junction 26 and Sarn Road and other off-site improvements including; pedestrian and cycle facilities, on-site community facilities and the integration of the landscape.
- 6.7.8 **Policy BSC 12** relates to community facilities and states that proposals for their provision will be supported providing they are located within existing development boundaries. The policy justification identifies that <u>healthcare</u> provision is a key facility for communities, and that it has been identified through the Primary Care Estates Strategy (2008) that new or improved community healthcare facilities will be needed in Bodelwyddan.
- 6.7.9 **Policy VOE 1** seeks to ensure that development proposals maintain and where possible enhance the characteristics, local distinctiveness and value to local communities of sites of built heritage (which includes Listed Buildings and Conservation Areas). The Policy also seeks to achieve the same goals with regards to designated and local sites of nature conservation.
- 6.7.10 **Policy VOE 5** requires any development that may impact a protected species or site of nature conservation value to provide mitigation or enhancements for any features impacted.
- 6.7.11 **Policy VOE 6** requires all development to incorporate water conservation measure, where practicable. Development proposals over 1,000 sq.m in size should be accompanied by a Water Conservation Statement. All development is also required to eliminate or reduce surface water run-off from the site, where practicable.
- 6.7.12 **Policy ASA 1** relates to the provision of new transport infrastructure and improvements to existing infrastructure facilities. It states that proposals for these forms of development will be supported providing; there is a need and justification on economic and/or social grounds; there are no unacceptable impacts on the natural and built environment; and provision is made for safe access for all users, including cyclists, pedestrians and the mobility impaired.
- 6.7.13 **Policy ASA 2** sets out that any developments which are expected to result in a need for public or active transport improvements will be required to incorporate or contribute to the cost of their provision.
- 6.7.14 Policy ASA 3 relates to parking standards and expects all developments to provide appropriate parking for cars and bicycles. If the use of the premises requires parking infrastructure for people with mobility impairments, then this will be taken into consideration when determining the level of parking provision.

## **6.8 Supplementary Planning Guidance**

- 6.8.1 The Council have produced a series of Supplementary Planning Guidance Notes (SPG's) which provide additional details and guidance on a range of development topics. These SPG's are material considerations in determining planning applications. A review of the published SPG's has found the following to be of relevance to the application:
- 6.8.2 **Residential Development SPG** The document primarily provides detailed guidance in respect to new residential developments. Contained within the document is design guidance in respect to protecting residential amenity, specifically in regard to privacy and overlooking. The guidance indicates that care should be taken within design proposals to avoid direct overlooking of neighbouring properties from first floor (or above) window. The guidance note indicates that where a window to a habitable room directly faces a similar habitable room at a neighbouring property then a distance of 21m should be retained between the two windows, when experienced in a direct back-to-back situation. The guidance goes on to indicate that where direct overlooking of a habitable room can be avoided by the position of windows, then the required separating distance can be a minimum of 18 metres.
- 6.8.3 **Planning and the Welsh Language SPG** The document provides additional guidance on the requirements established by Policy RD5 of the Local Plan and on the need to provide detailed community and linguistic assessments in support of major planning applications.
- 6.8.4 Parking Requirements in New Developments SPG The document provides detailed guidance with regard to the provision and composition of parking in new developments. In respect to hospitals, the guidance states that 2.5 spaces should be provided per hospital bed, and that there should be sufficient provision for all essential vehicles associated to a development.
- 6.8.5 Conservation and Enhancement of Biodiversity SPG The guidance outlines the Council's expectations regarding the level of biodiversity related information to be submitted in support of planning applications and the scope and standards required of any supporting ecological surveys.
- 6.8.6 **Access for All SPG** This document provides detailed guidance on the Council's expectations in regarding to creating accessible places for all. The document provides general guidance for providing adequate accessibility and in-depth design principles that provide the standards and building regulations that must be adhered to in providing access to all.
- 6.8.7 **Trees and Landscaping SPG** This document provides guidance for tree protection and landscaping schemes. The guidance identifies that Arboricultural Impact Assessments are expected to be provided to support large scale planning applications.

# 7 Compliance with Planning Policy

## 7.1 **Principle of Development**

- 7.1.1 PPW 11 establishes at Paragraph 1.18 that there is a presumption in favour of sustainable development, in accordance with the development plan, unless material considerations indicate otherwise to ensure that social, economic and environmental considerations are balanced and integrated.
- 7.1.2 The adopted Local Plan specifically allocates the proposed location for the new mental health unit for 'Community Facilities' under Policy BSC 12 (shown as blue hatching on figure 2 below). Policy BSC 12 identifies proposals for the provision of new community facilities will be supported in such locations providing that they are located within existing development boundaries.

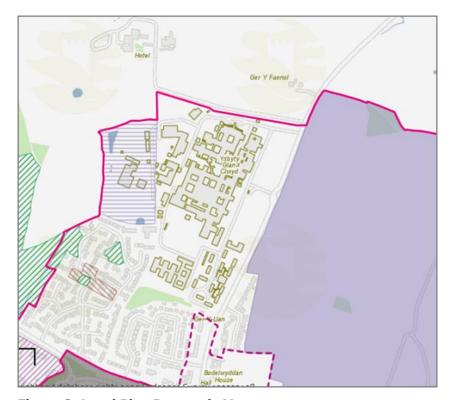


Figure 3: Local Plan Proposals Map

7.1.3 The policy justification states;

'The Council will support and encourage the retention and improvement of community facilities which provide an essential facility to support the sustainability of Denbighshire's communities.'

7.1.4 The policy justification goes on to state that health care provision is a key facility for communities and that the Primary Care Estates Strategy (2008) identifies for the development of new and improved health care at the site in Bodelwyddan.

- 7.1.5 The site is located within the defined development boundary of Bodelwyddan and therefore the principle of providing a health care facility on the site is supported by the Local Plan. Appropriate weight should be provided to Policy BSC 12 and account taken of the significant benefits to local health care provision, specifically in the field of mental health, as well as the wider community benefits which would be achieved through the delivery of the scheme.
- 7.1.6 The majority of the remaining parts of the hospital campus site are not provided a specific policy allocation. The location for the proposed multi-storey car park is therefore not the subject of any specific policies or allocations. As such, in planning policy terms, the car park site is not identified for any other purpose within the adopted Local Plan and therefore would not compromise any Local Plan aspirations.
- 7.1.7 Both of the proposed development plots represent previously developed land within the defined development boundary of Bodelwyddan. PPW 11 at paragraph 3.55 promotes the use of previously developed brownfield land above the use of greenfield sites. In regard to proposals on previously developed land, it states;
- 7.1.8 'In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.'
- 7.1.9 The following sections of this Statement will address the relevant constrains for the application site. However, notwithstanding any local constraints, PPW 11 is explicit in that the starting point should be that the sustainable re-use of previously developed land should generally be considered suitable and supported.
- 7.1.10 The proposals would not result in a significant intensification of use at the hospital. The proposed new mental health unit would provide a direct replacement for the existing Ablett Unit. The existing Ablett Unit was built to provide a maximum capacity of 72 beds. With the proposed new unit providing 59 patient beds, there would be a net reduction in the maximum number of patient beds at the site. However, the new facility would be much better equipped to deal with patient demand and care needs. The facility would principally provide care for residents within Denbighshire, Conwy and parts of Flintshire.
- 7.1.11 The new multi-storey car park would replace the parking provision lost in developing the site for the new hospital unit, ensuring that sufficient parking will remain being provided across the hospital site. In allowing for the hospital's parking provision to be better focused close to the hospital's entrance, parking arrangements would be beneficially simplified, helping to relieve congestion within the hospital campus.

7.1.12 In respect to transport and access considerations, existing access points would continue to be used. As such, there are no arising 'in-principle' highway safety concerns in respect to forming appropriate access into the sites.

#### **Existing Ablett Unit Buildings**

- 7.1.13 As previously indicated, the Ablett Unit buildings would be retained and used to accommodate existing office and administrative functions from within the existing hospital campus. The buildings are also intended to be utilised to provide a central patient archive.
- 7.1.14 Although the existing Ablett Unit has been identified as no longer fit-for purpose in meeting the needs of patients as a functioning mental health facility, the permanent buildings in place provide a useful resource to the hospital, and therefore it is intended that they are retained.
- 7.1.15 The existing buildings would continue to function within a hospital use, they would not be used as additional hospital bed capacity and are unlikely to be used in a 'patient-facing' capacity. Alongside providing archiving and record storing space, the existing buildings would also in-part be used as a resource to better accommodate some existing staff already employed at the hospital who currently work from temporary portacabin buildings, a significant number of which are located across the hospital campus. Re-purposing the Ablett building would provide such staff with more appropriate office/work spaces within the permanent structures of the existing Ablett buildings.
- 7.1.16 Given the intended future use of the existing Ablett Unit buildings, the new functions to be accommodated within the existing buildings would not intensify the use of the hospital site, with only staff and functions which are already currently located on the wider hospital site to be relocated to the retained Ablett Unit buildings. There would be no additional parking demand created through the uses accommodated within the existing Ablett Unit building, nor would there be any resulting additional servicing requirements.

## 7.2 **Design**

7.2.1 A Design and Access Statement is provided in support of the application. The Design and Access Statement provides information on the key design principles to be employed at the site and the rationale for the design proposals which are being developed.

#### New Mental Health Unit Facility

7.2.2 The design for the new building is principally led by the operational and accommodation requirements of the facility. Fundamentally, the facility is required to provide four specialist mental health inpatient wards, comprising two Adult Acute wards and two Older Persons wards, together providing a total of 59 beds accommodated within individual patient rooms. Due to the

- nature of the facility, some patients will need to be cared for over an extended period. Alongside the main wards, supporting facilities would include patient social spaces, therapy rooms, a welcoming reception space with cafe, gym rooms, visitor facilities and a designated staff admission floor.
- 7.2.3 The design has been guided by close engagement with the Hospital Board to ensure that the facility will successfully meet the future operational needs of both patients and staff and will be best equipped to provide high-quality specialist care.
- 7.2.4 The proposed building amounts to 9,794 sq.m (GIA), achieved through a part 2-storey and part 3 storey building. A contemporary, high quality architectural design has been developed, inkeeping with similar more recent building additions at the hospital. The building's design adopts a feature main entrance located on its eastern side, facing on to a new entrance plaza. The entrance has been designed to provide visual interest to the building as well as to facilitate greatest connectivity for pedestrians.
- 7.2.5 The building's form and design has been carefully considered to offer a stepping down in the building's height and massing towards the western boundary, beyond which are open agricultural fields. The building's height, scale and massing would sit comfortably within the setting and surroundings, with existing buildings within the hospital campus ranging from two-storeys up to five-storeys in height. The neighbouring Pathology building sited to the south of the proposed new hospital unit is primarily two-storeys in height. Similarly, neighbouring hospital buildings immediately to the east of the site are also of a height equivalent to roughly two storeys.
- 7.2.6 The principal front elevation of the building would be three storeys in height, providing visual interest and prominence for the main entrance. The entrance plaza would provide a positive public realm environment offering connectivity with the surrounding hospital environment. The design strategy would allow for an engaging design to be achieved which would significantly improve the visual amenity and quality of the built environment in this part of the hospital campus.
- 7.2.7 The site offers opportunities to afford patients therapeutic views over the neighbouring green spaces found to the north and west of the site. A key component of the design will also be the inclusion of a number of garden spaces, located within an internal courtyard, as well as alongside the northern, western and southern sides of the building. The gardens will provide safe outdoor amenity spaces for patents to aid their recovery and well-being. Further green landscaping would be introduced to the front of the building.
- 7.2.8 The plans presented show how an appropriate layout and orientation can be achieved on the site, working within the site's constraints. The building has been designed to be set-back from

- an existing drainage pond found immediately to the west of the site, so as to retain this drainage feature.
- 7.2.9 The site is presently constrained by an existing overhead high-voltage electricity power line which spans across the site. Engagement has taken place with the local energy network provider to establish that a suitable diversion of this power line can be carried out. Agreement and consent for this process is to be pursued separately from this planning application with the local energy network provider.
- 7.2.10 In summary, the design proposals present a high-quality and engaging design, befitting of a flagship facility. The proposals demonstrate the good design standards required by PPW 11 and the Local Plan and specifically the design principles established by Local Plan Policy RD1.

#### Multi-Storey Car Park

- 7.2.11 The new multi-storey car park's footprint would cover approximately just over half of the area of the existing Car Park 3 at the front of the hospital campus. This decked car park would provide three levels of parking across ground, first and second floor levels. The building would be of a comparable height to that of existing neighbouring buildings within the hospital campus.
- 7.2.12 The siting of the car park building is influenced by an existing underground water main and an associated easement which traverses across the site. As such, the multi-storey carpark would stand on the northern part of the surface car park to avoid building over the identified easement.
- 7.2.13 The proposals would make better use of the site, allowing for parking provision to be more efficiently focused adjacent to the hospital's main entrance.
- 7.2.14 In replacing a surface car park, there is limited existing character to the development plot other than some supporting soft landscaping on the existing verges. Suitable soft landscaping would be incorporated into the final detailed design. The car park building would not overshadow or detract from any existing buildings within the vicinity.
- 7.2.15 Appropriate use of external cladding will be used to visually break-down the massing of the building and help it assimilate to its surroundings. The retention and strengthening of trees and landscaping along the site's boundary will help to provide screening to Rhuddlan Road.
- 7.2.16 In addition, the scale of the proposed car park is reduced from the design parameters submitted in the 2020 application. In the previous application no concern was raised by the Council on those design parameters and there was no ground for refusal relating to the proposed car park site.

## 7.3 **Amenity**

#### 7.3.1 New Mental Health Unit

#### Residential Amenity

- 7.3.2 The proposals for the new-build mental health unit have been comprehensively changed following the refusal of previous application reference 40/2020/0813 in January 2021. Amenity concerns were raised with the previous application proposals associated to the building's proximity to neighbouring residential properties to the south of the hospital's grounds on Ffordd Parc Castell. To address these concerns, the latest proposals seek to utilise an entirely different location for the development of the new unit, located well away from any neighbouring residential properties. The latest proposals locate the new building within a plot in the northwestern corner of the hospital's campus, on an existing area of surface car parking (Car Park 5).
- 7.3.3 This newly proposed location is situated approximately 160m from the closest neighbouring residential properties which would be found at the Ffordd Parc Castell estate to the south. Approximately 200m to the north of the site is the Faenol Fawr County House and Manor. There are no other private residential properties sited in the closer vicinity.
- 7.3.4 The hospital's existing Pathology Department building and a sizeable surface car park would now stand between the new mental health unit and the Parc Castell residential estate found to the south. Open agricultural fields neighbour the site to the north and west, with existing hospital buildings neighbouring the site to the south and east.
- 7.3.5 It is clear that the revised location would not cause any residential amenity concerns for neighbouring occupants in terms of impacting privacy, allowing for undesirable overlooking, or impacting daylight or sunlight enjoyed, thus providing compliance with all relevant planning policies and guidance in this regard.

#### Surrounding Hospital Uses

7.3.6 The closest neighbouring hospital building to the proposed location is the Pathology Department building located immediately to the south of the site. The northern part of the Pathology building which would face towards the proposed new mental health unit accommodates an internal energy centre alongside storage areas. Consequently, there are no workspaces or habitable accommodation in this part of the neighbouring building, and subsequently no windows which face directly towards the proposed new mental health unit. Office and lab spaces within the Pathology Department building principally have outlooks towards the east, west or south and therefore not towards the proposed mental health unit. This arrangement helps to ensures that suitable privacy will be provided and retained for the internal rooms within both the new mental

- health unit and the existing Pathology Department building. Similarly, the Pathology building's working spaces would not experience any material loss of daylight or sunlight as a result of the development.
- 7.3.7 To the east of the proposed site is the internal access road which circumnavigates the hospital campus and would be retained. Further to the east are buildings associated to the hospital's estates management team, and their vehicle compounds. These uses and buildings do not present any amenity concerns for the proposals.



Figure 3. Proposed site for mental health unit - Existing car park looking south.



Figure 4. Proposed site for mental health unit - Existing car park looking north.

#### **Noise**

- 7.3.8 A Noise Impact Assessment has been undertaken to demonstrate that noise associated to the operation of the proposed new mental health unit can be suitably controlled and will not unduly impact upon the amenity enjoyed at any neighbouring properties. The assessment also establishes that an appropriate noise climate for the hospital wards will be achieved internally within the building.
- 7.3.9 The Noise Impact Assessment undertaken has included a survey of the background noise levels at the application site to establish the existing noise climate. From this assessment suitable maximum noise limits have been identified for the operation of any required external plant in order to appropriately protect the amenity of the closest neighbouring noise sensitive properties, these being residential properties on Ffordd Parc Castell to the south of the site and Faenol Fawr Country House & Manor to the north. The Noise Impact Assessment concludes that any required plant equipment can appropriately be designed to adhere to the identified operational noise limits. Any roof mounted plant would also be contained within enclosed plant room, helping to contain any operational noise.
- 7.3.10 In respect to servicing requirements, deliveries would be undertaken from a designated delivery bay to the south of the new mental health unit, close to the neighbouring pathology building. Servicing activities and associated vehicle movements would therefore be undertaken well away from any neighbouring residential properties. Servicing and delivery vehicles would not undertake their unloading/loading operations directly adjacent to the mental health unit, which will help to reduce any possible noise disturbance for patients.

#### Multi-storey Car Park

7.3.11 With regard to any impacts upon residential amenity as a result of the multi-storey car park development, the potential for any detrimental impacts is considered to be limited. The site already functions as a car park and therefore the nature of the use is already established. There are no directly neighbouring residential buildings or sensitive land uses which would be directly impacted. The closest private residential property is found circa 140m away to the south on the opposite side of Rhuddlan Road. Existing hospital buildings are sited at a closer distance. It is considered that an intensification of this outlying part of the hospital site for car parking would not impact upon the function of any existing hospital building. The proposed multi-storey car park would therefore accord with PPW 11 and Local Plan Policy RD1 in respect to not adversely impacting upon the amenity of existing users.

#### <u>Summary</u>

7.3.12 The plans presented demonstrate that the development proposals will accord with the requirements of the Local Plan to protect amenity, specifically criteria (vi) of Policy RD1, which requires for new developments to not result in unacceptable affects for the amenity of any local residents or land users. It can also be demonstrated that the scheme will accord to the guidance contained within the Residential Development SPG in respect to suitably protecting amenity and privacy of existing users through appropriate spacing between buildings.

## 7.4 **Transport**

7.4.1 A Transport Assessment has been undertaken by Via Solutions to consider the transport implications of the development. The Transport Assessment provides further detail on the development proposals in respect to highway, access and parking matters and ultimately the compliance of the proposals with relevant national and local planning policy, including the provisions of TAN 18.

#### Access and Highways

- 7.4.2 The new facility would be accessed via the existing internal road which encircles the hospital campus. Designated accessible parking spaces/drop-off spaces would be provided adjacent to the new building.
- 7.4.3 Principally, safe vehicle access to both the new hospital building and the multi-storey car park site would be provided by utilising existing and established access and egress points. Vehicle access for the new hospital building would be taken from the hospital's existing internal access road, as is currently the case for the existing surface car park. The multi-storey car park would utilise access points from Sarn Lane, as is currently the case for the existing surface car parking in this location.
- 7.4.4 The servicing requirements for the new hospital building has been carefully considered within the design. A designated deliveries and servicing bay would be provided to the south of the building, alongside suitable road infrastructure to provide turning and manoeuvring space for vehicles.
- 7.4.5 With the new facility providing a direct replacement for the care and services provided at the existing Ablett Unit, there would not be a material increase in additional vehicle trips being generated as a result of the development. Consequently, there would not be a material impact for the local highway network.

#### <u>Parking</u>

- 7.4.6 In terms of existing parking provision, the surface car park in the north-western corner of the hospital site, which is proposed to be redeveloped, currently provides approximately a maximum of 244 car parking spaces. These parking spaces would be lost to make way for the new hospital building.
- 7.4.7 The development of a new multi-storey car park in the north-eastern corner of the hospital campus would directly replace the spaces lost to accommodate the new hospital unit. In providing two upper decks of parking, a net increase of 221 parking spaces would be achieved in this location. A limited number of new accessible spaces, (11no. in total), would also be provided adjacent to the new mental health unit. When considering both development plots together, overall, the proposals would ensure existing car parking capacity would remain largely unchanged across the hospital, with the existing level of parking by-enlarge retained.
- 7.4.8 It is intended that the multi-storey car park would be completed before building work starts on the new hospital unit. Further commentary on the parking provision to be provided is presented within the supporting Transport Assessment.
- 7.4.9 At present, multiple car parks are dispersed across the hospital site which does not provide a clear parking strategy for visitors upon arrival. The introduction of enhanced parking through a multi-storey facility in the north-eastern corner of the hospital campus will provide parking in a more logical and easily accessible location. This in turn will allow for more efficient parking and an easier experience for users, simplifying and improving vehicle movements within the hospital.
- 7.4.10 The provision of accessible spaces provided adjacent to the new hospital unit would ensure that the specific requirements of all users of the facility would be met. It would also function as a location to undertake pick-ups and drop-offs.
- 7.4.11 Improvements have been made in recent years to provide a circa 20% increase in car parking capacity at the hospital.
- 7.4.12 Local Plan Policy ASA 1 which relates to the provision of new transport infrastructure, provides support for new infrastructure where there is a need and justification on economic and social grounds, providing there are no unacceptable impacts upon the natural and built environments or safety.

#### Sustainable Travel

7.4.13 The hospital site represents a sustainable and readily accessible location. This is evidently accepted as the case by virtue of the Local Plan strategic allocation site to the east which will anticipates new housing and employment uses within Bodelwyddan.

- 7.4.14 From the hospital a number of local bus services can be accessed which offer routes to many of the principal neighbouring conurbations. The nearest bus stop is located close to the hospital's main entrance. From this location bus service nos. 51 (Denbigh Rhyl), 13 (Prestatyn Llandudno) and 45 (Rhyl Bodelwyddan) can all be accessed.
- 7.4.15 As part of ongoing efforts to reduce the carbon impact of the Health Board's activities and demand for parking, measures are being explored as to how greater use can be made of cycle to work and car share options, public and community transport schemes, agile and home working, and increased use of video and online technology for remote consultations, where appropriate.
- 7.4.16 There would be an intention for a number of electric vehicle charging points to be provided within the new car park. Secure cycle parking would also be incorporated within the scheme.
- 7.4.17 In terms of existing provision for access by pedestrians and bicycle, Rhuddlan Road presently offers a shared pedestrian and cycling provision. It is also understood that a new Toucan crossing is proposed on Rhuddlan Road as part of residential proposals currently under consideration for the neighbouring site to the east.
- 7.4.18 As part of the 'Active Travel' initiative in Wales to improve opportunities for walking and cycling, Denbighshire County Council have published a series of 'Integrated Network Maps'. The map for Bodelwyddan identifies potential for improved walking and integrated walk/cycle routes within Bodelwyddan, including on Rhuddlan Road heading north out of the village past the hospital campus. Implementation of the Council's identified Active Travel improvements would in the future help to support increased levels of sustainable travel to and from the hospital campus.
- 7.4.19 The new hospital building would be designed to be accessible to all groups of people, providing level access and mobility for all users.

#### Summary

- 7.4.20 Careful consideration has been given to transport and parking. The scheme will continue to utilise safe, established access points. Overall parking capacity at the hospital will be retained and will be more appropriately located and better able to more efficiently serve the hospital.
- 7.4.21 In providing a replacement mental health unit, the proposals will not have a detrimental impact on the surrounding highway network and have been designed to provide compliance with the requirements of PPW 11, TAN 18, Local Plan Policies RD1 (criteria (vii) and (viii)), ASA 1 and ASA 3 and the adopted Parking Standards in New Developments SPG.

## 7.5 **Security**

- 7.5.1 The proposed new facility will primarily provide replacement provision for that of the existing Ablett Unit. The hospital therefore already provides mental health care services at the campus and is experienced in managing the necessary security arrangements to appropriately protect patients and staff.
- 7.5.2 The proposed new facility presents an opportunity to deliver improved security infrastructure, both internally within the building and externally within its curtilage. Ensuring that the building will be designed to be safe and secure for all users forms an important part of the design process for the new building. Externally, appropriate secure fence lines will be provided to the perimeter of the facility. The patient garden spaces to be incorporated will be located within the new unit's secure managed space.
- 7.5.3 Security practices and interventions will be put in place across the building, with access-controlled doors for each ward. The facility will be managed by experienced staff, who are trained in providing safe care within a secure environment. Engagement has taken place with the Police's Design Officer, with the recommendations provided being used to inform the design progression for the new building.

## 7.6 **Heritage**

- 7.6.1 There are no listed buildings or other identified heritage assets either on the site or in close proximity to the site. Furthermore, no part of the application site is located within or adjacent to a Conservation Area.
- 7.6.2 The Bodelwyddan Village Conservation Area is located to the south of the hospital, focussed around the historic centre of the Bodelwyddan village and includes properties and land on both sides of The Village/Rhuddlan Road highway as well as St Margaret's Church further to the east. There are a number of listed buildings found within the Conservation Area, including two terraces of residential properties (numbers 1-18) sited on the eastern side of The Village, set behind their respective defined front gardens and Bodelwyddan Village Hall. These properties are identified as Grade II listed. St Margaret's Church is also grade II\* listed.
- 7.6.3 The northern limit of the conservation area is approximately 450m to the south from the closest part of the application site, which would be the site of the proposed multi-storey car park fronting Rhuddlan Road. A significant part of the hospital's campus, as well as residential properties of a 1960s and 1970s character on Rhuddlan Road are in situ between the proposed site for the multi-storey car park and the Conservation Area. The surrounding character of the built environment around both of the application site parcels is predominantly defined by the modern hospital campus setting and neighbouring residential properties of a relatively modern

period and design. This presiding character, combined with the significant separating distance between the application site and the Conservation Area ensure that the development proposals would not have a material impact upon any part of the neighbouring Conservation Area or its setting, with no part of the application site viewed alongside properties which contribute to the character of the Conservation Area. For the same reasons, none of the listed buildings within the Conservation Area or their respective settings would be materially impacted by the development proposals.

- 7.6.4 To the north of the hospital is a group of four listed buildings which together form part of the Faenol Fawr Hotel complex. These include the grade II\* Faenol Fawr building and Grade II listed supporting buildings. The Faenol Fawr hotel complex is accessed from Rhuddlan Road via a long access track. The buildings themselves are surrounded on all sides by agricultural fields, with boundary vegetation, hedgerows and stone walls establishing a perimeter to the complex. An established line of trees and vegetation extends along the full extent of the access track to the complex, providing a visual barrier between Faenol Fawr and the hospital campus. Its location is well distanced from the hospital campus being circa 200m from the proposed site for the replacement mental health unit, separated by a sizeable agricultural field with vegetation and trees along its fringes. It is considered that there would only be restricted views of the proposed mental health unit from within the grounds of the Faenol Fawr hotel. From that vantage point the proposed new building will sit within the backdrop of the existing hospital buildings. The listed buildings and their grounds would not principally be viewed alongside the proposed new building given the separation distance and orientation. Within this context, the proposals are not considered to materially impact upon any building at Faenol Fawr or their setting.
- 7.6.5 There are no scheduled monuments located on the site or in the local vicinity. The closest scheduled monument is located approximately 2km to the south of the application site beyond the limits of Bodelwyddan village. This being First World War practice trenches at Bodelwyddan Park. The proposals will in no way impact upon this scheduled monument.
- 7.6.6 In summary, all heritage assets within the vicinity of the application site have been identified and considered in respect to the potential for the development to impact upon their character, value or significance. It is subsequently considered that the development proposals will not have a material impact upon any listed buildings, conservation areas or other heritage assets. The proposals therefore accord with PPW 11 and Local Plan Policy VOE 1 in respect to the protection of heritage assets.

## 7.7 **Ecology**

- 7.7.1 The development of the site can be achieved without any adverse impacts for the biodiversity and ecology of the area. The design has been led by an aspiration to focus new development on previously developed land and to retain as far as possible existing established vegetation and green space along the boundaries of the site. The site areas are of limited ecological value, being predominantly covered by hardstanding.
- 7.7.2 The site is not subject to any nature conservation designations, nor is it in close proximity to any protected sites of ecological interest. A search on the Council's website has found there to be no local nature conservation designations which apply to the site.
- 7.7.3 An extended Phase 1 Ecology Assessment has been undertaken and is provided in support of the application. It provides a comprehensive assessment of both the site and its surrounding's ecological value and the potential to support protected or notable species. It also identifies suitable recommendations to ensure the protection of habitats and protected/notable species.
- 7.7.4 A Constructional Environment Management Plan will include measure which will be put in place to protect any habitats or ecological features which neighbour the site.
- 7.7.5 The new hospital unit would incorporate a series of garden and soft landscaping area. Opportunities will be taken in the soft landscaping proposals to enhance and encourage local biodiversity, such as through native and wildlife friendly planting as well as support for habitats such as through provision of bat and bird boxes.
- 7.7.6 For the multi-storey car park, strengthening the existing planting along the site's fringes provide further opportunities for biodiversity and planting improvements.
- 7.7.7 Based on the findings of the Ecological Assessment, suitable reasonable avoidance measures and enhancements for the site can be appropriately conditioned as part of any planning permission to address all ecological matters and to provide compliance with PPW 11, Local Plan Policy RD1 and VOE 5.

## 7.8 **Arboriculture**

- 7.8.1 A comprehensive Arboricultural Impact Assessment including a Tree Survey (prepared by TEP) is provided as part of the planning application submission. The assessment sets out the arboricultural impact of developing the site as well as outlining any subsequent mitigation recommendations and protective measures.
- 7.8.2 Broadly speaking, the extent of trees and vegetation present at the application site is relatively limited, with both development plots predominantly being covered by hardstanding and operating as surface car parks.

- 7.8.3 Existing trees and vegetation at the site for the proposed new hospital unit are limited to its western and northern boundaries. The building layout seeks to respect the existing trees and vegetation along these boundary lines with all existing trees and complementary vegetation to be retained. An existing drainage pond feature to the west of the building would be retained to continue to be used as a sustainable drainage feature and serve as a feature for wildlife.
- 7.8.4 For the site of the multi-storey car park, existing trees are confined to the verges alongside the eastern and southern boundaries of the existing surface car park. In a similar fashion, the multi-storey car park development would retain and strengthen existing vegetation along these verges which can be achieved with limited disruption to existing landscaping features.
- 7.8.5 No trees on or immediately adjacent to the application site are subject to a Tree Preservation Order or are located within a Conservation Area. A Tree Preservation Order is in place to the north of the proposed location for the multi-storey car park, on the opposite side of the access road into the hospital campus. No works are proposed in the vicinity of the protected trees which are the subject of this Order or their root protection areas. Consequently, no impacts would occur upon these trees as a result of the proposed development.
- 7.8.6 The surveys undertaken have included a check for the presence of invasive plant species, with none identified on any part of the application site area.
- 7.8.7 The proposals present a complimentary design scheme compliant with Local Plan Policy RD1 through the protection of existing arboriculture and by incorporating existing landscaping features and improvements. The new planting scheme would be focused on supporting native biodiversity improvements.

#### 7.9 Flood Risk

- 7.9.1 Natural Resource Wales' online mapping resource confirms that the site is wholly located within Flood Zone 1, and Zone A with regards to river/sea flooding and therefore is identified as at *'little or no risk'* from fluvial or tidal sources of flooding.
- 7.9.2 No part of the site for the proposed new hospital unit is identified as at risk from surface water flooding. Part of the site for the multi-storey car park is identified as being at risk from surface water flooding, however, the car park use does not represent a vulnerable land use. An appropriate drainage strategy is provided which addresses surface water drainage for the site.
- 7.9.3 The existing site areas are predominantly hard surfaced with soft landscape verges. The proposed development will not significantly increase the cumulative area of impermeable surface across the site and will continue to provide supporting soft landscaping, which will assist to slow surface water run-off.

## 7.10 **Drainage**

- 7.10.1 The Planning Application is supported by a Drainage Statement which outlines how surface water and foul drainage will effectively be provided to serve the proposed development,
- 7.10.2 The new mental health facility is proposed to utilise the existing Sustainable Urban Drainage System (SUDS) which was constructed to serve the existing car park which it will replace. Surface water would be designed to drain into an existing drainage pond within the hospital campus, from which the outfall will discharge into an adjacent ditch.
- 7.10.3 The drainage pond will serve to provide attenuation and to restrict the discharge rate to the adjacent ditch. Further attenuation storage would be incorporated to reduce the runoff rate from the site into the drainage pond. The new hospital unit proposals will also incorporate a series of new garden spaces. These green spaces will provide further interception of surface water runoff.
- 7.10.4 The footprint for the new multi-storey car park will not exceed that of the existing surface car park at this location, and therefore will not increase the extent of impermeable surfaces. This site will continue to drain into a private sewer at the hospital site which in-turn discharges to an adjacent ditch watercourse.
- 7.10.5 In accordance with the guidance set out within TAN 15, the drainage hierarchy will be followed in the progression of a detailed drainage design for the site, which will demonstrate that the development proposals will not increase flood risk either on the site or elsewhere.
- 7.10.6 A separate application is to be submitted to the SUDS Approval Body to gain approval for the drainage strategy and design.

#### 7.11 **Site Investigations**

- 7.11.1 Prior to the site for the proposed new hospital building being developed for car parking, the land was undeveloped agricultural land. It therefore does not have a history of use which would present any land condition concerns.
- 7.11.2 Site investigations have been undertaken for the two development plots to fully establish the presence of any geological or contamination constraints. The investigation works establish that suitable ground conditions exist for development in these location with no known sources of ground contamination.

#### 7.12 Water Conservation

7.12.1 The application is supported by a Water Conservation Statement which provides details on the measures to be adopted to aid water conservation. The proposed new building will seek to

- incorporate a series of active measures to limit water consumption and aid water conservation.
- 7.12.2 Principally, the new mental health unit targets reducing water consumption by 40% compared to the baseline level for a building of its proposed scale and use. This will be achieved through incorporating water efficient fittings, water metering systems and leak detection systems. The measures to be incorporated will provide compliance with Policy VOE6 of the adopted Local Plan which relates to the requirements for water conservation.

## 7.13 **Sustainability**

- 7.13.1 The building design is seeking to maximise its sustainability potential and energy performance.

  Photovoltaic panels are proposed for the building's roof, providing a renewable energy source and reducing the building's external energy demands.
- 7.13.2 The facility is targeting to achieve a BREEAM assessment rating of 'Excellent' through adopting sustainability measures and practices across the design. This would include achieving the mandatory credits to achieve an 'Excellent' rating for category ENE1 'Reduction of CO2' Emissions', in accordance with requirements set by the Welsh Assembly.
- 7.13.3 Further details of the buildings' sustainability measures and targets are detailed within the supporting BREEAM Planning Report provided.
- 7.13.4 The new multi-storey car park will provide provision for electric vehicle charging.

#### 7.14 **Welsh Language and Culture**

- 7.14.1 Section 31 of the Planning Wales Act (2015) and subsequent amendments to Section 70 of the Town and Country Planning Act 1990, requires applicants to have regard to the Welsh Language, so far as it is material to any planning application. This requirement is also supplemented by guidance contained within TAN 20 (Planning and the Welsh Language). As identified within Section 6 of this Statement. Guidance within TAN 20 also refers to proposals achieving;
  - 'a society that promotes and protects culture, heritage and the Welsh Language and which encourages people to participate in the arts, sports and recreation.'
- 7.14.2 Consideration has been provided to the Welsh language and culture in the process of bringing forward the proposals. The application is supported by a Community and Linguistic Impact Assessment (CLIA), which assess the likely impact of the proposed development on the local community and Welsh language and provides recommendations which can be taken forward. The CLIA concludes that the proposed development is anticipated to have an overall beneficial effect on Welsh language.
- 7.14.3 Principally, the proposals are for improved hospital facilities, which will provide critically important health care to support the local community. The Health Board consider an important

part of their role within the community is to provide inclusive services which are available and accessible to all. This involves its obligations to supporting the Welsh language and the needs of Welsh language speakers. These themes would be pursued in the operations of the new mental health unit.

7.14.4 Following a comprehensive assessment of the impact of the proposals upon Welsh language, it is considered that the proposals will wholly comply with the requirements of PPW 11, the guidance contained within TAN 20 and Policy RD 5 of the Local Plan in this regard, with the proposals actively contributing towards supporting the Welsh language.

## 7.15 **Community Benefits and Improvements for Mental Health Care**

- 7.15.1 The proposals principally seek to provide a new and improved mental health care facilities to serve the needs of the Denbighshire community as well as further afield. Proposals for new community facilities, such as those being proposed under this application, are explicitly supported by Policy BSC 12 of the Local Plan.
- 7.15.2 With specific regard the proposed hospital unit, the new facility would;
  - Represent an investment of up to £84.5 million in the delivery of a new state of the art facility.
  - Provide greatly improved clinical facilities which would address long standing issues associated to the existing Ablett Unit;
  - Provide new mental health bed space to help meet current and future demand;
  - Provide a modern environment, based on the latest evidence, giving greater flexibility to respond to future needs; and
  - Allow for new models of care to be introduced to better meet the needs of patients.
- 7.15.3 The new building would address known shortcoming of the existing Ablett Unit and in-doing so secure the future of mental health care at the Glan Clwyd Hospital site. The delivery of a new facility will also allow for more people from Denbighshire and Conwy to receive care closer to home.
- 7.15.4 As well as the benefits to patient care, associated positives for hospital staff and the wider workforce would be achieved. Firstly, the long-term security of mental health care at Glan Clwyd hospital would be delivered. A more attractive workplace for staff would be created, which alongside enabling staff to improve the levels of care provided, will support staff retention. As shown by the population profile of the Bodelwyddan Ward included within the supporting Community and Linguistic Impact Assessment, around 25% of the ward's population are employed within the human health and social work activities industries.¹ Evidently this

<sup>&</sup>lt;sup>1</sup> Source: ONS 2011 Census Data, Industry KS605EW

- employment sector is significantly important locally.
- 7.15.5 During the construction process, the delivery of the scheme will create important employment opportunities, as well as within the supply chain, providing new opportunities for the local population.
- 7.15.6 In summary, the community benefits of the scheme are far reaching and appropriate weight should be provided in the decision making process to the potential community and health benefits which would be achieved.

## 7.16 **Summary**

7.16.1 Having regard to the above, the design proposals presented and the supporting technical reports submitted, the development proposals are deemed acceptable and would provide lasting community benefits. The proposals meet the requirements of national and local planning policies as outline in Section 6 of this Statement.

## 8 Conclusions

- 8.1.1 This Planning Statement has been prepared in support of a planning application for the development of a new specialist mental health unit to replace the existing Ablett Unit and a new multi-storey car park at the Glan Clwyd Hospital.
- 8.1.2 The proposals are submitted in response to the need to provide a replacement mental health facility which can appropriately deliver mental health care to meet the current and future needs of the community. The replacement unit would provide greatly improved facilities and environments specifically designed to support patient recovery and will address longstanding structural issues for the delivery of mental health care at the hospital.
- 8.1.3 The planning application is being brought forward as part of the Health Board's process to establish the full business case for the proposed new hospital unit and in turn to secure final funding approval from Welsh Government.
- 8.1.4 The proposed site for the new hospital unit is specifically allocated within the adopted Local Plan to deliver improvements to 'community facilities'. The principle of the site to deliver a new healthcare facility therefore is anticipated and supported by the Local Plan.
- 8.1.5 The proposed new hospital building would occupy a position which presents no concerns for residential amenity, being located well away from any neighbouring residential properties. The new building would showcasing a high quality and engaging design and represent a flagship facility for mental health care.
- 8.1.6 The development would be delivered on brownfield land in a sustainable location which is well served by public transport, located within the defined development boundary of Bodelwyddan.
- 8.1.7 The proposals are supported by car parking infrastructure improvements through the delivery of a new multi-story car park. This will ensure that parking capacity is not negatively impacted whilst providing simplified, and more easily accessible parking arrangements for the hospital.
- 8.1.8 The plans would not result in a significant intensification of use at the site, with the new hospital unit providing a direct replacement for the existing Ablett Unit. The existing Ablett Unit buildings would no longer be used for clinical care but would be retained to accommodate some existing office and administrative functions of the hospital.
- 8.1.9 The application submission is supported by a comprehensive suite of technical documents which together establish the acceptability of delivering the proposed development at the application site.
- 8.1.10 Through this Statement it has been demonstrated that the proposals accord with both national planning policy and local planning policies contained within the adopted Local Plan.