

# **Glan Clwyd Hospital: Nuclear Medicine Facility**

## **Planning Statement**

Client: The Betsi Cadwaladr University Health Board and  
BAM Construction  
September 2023

Tetra Tech, 2<sup>nd</sup> Floor, 11 York Street, Manchester, M2 2AW

Tetra Tech Environment Planning Transport Limited. Registered in England number: 03050297

Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

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Project:	Glan Clwyd Hospital – Nuclear Medicine
Prepared By:	Sam Beresford
Reviewed By:	Peter Campbell
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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). It supports a pre-application community consultation being undertaken with respect to outline proposals (all matters reserved) for the development of a Nuclear Medicine Facility at Glan Clwyd Hospital.
- 1.1.2 A statutory pre-application community consultation is being undertaken in advance of the proposals being further progressed and a planning application being submitted in due course. The consultation shares the draft planning application proposals.

### 1.2 Development Proposals Summary

- 1.2.1 The development proposals concern a new single storey building with a plant floor above. The new building would be built on an existing service yard immediately to the south of the main hospital building.
- 1.2.2 The new building would accommodate a Nuclear Medicine specialist imaging facility. The Health Board's Radiology Department, in which Nuclear Medicine falls, currently operates across three nuclear medicine departments, Glan Clwyd Hospital, Ysbyty Gwynedd Hospital and Wrexham Maelor Hospital. This development is planned to allow for some consolidation of the Health Board's nuclear medicine services at the Glan Clwyd site within a modernised and better equipped operation.
- 1.2.3 This Statement provides details of the proposed scheme and includes an assessment of the proposed development against the relevant planning policy framework.

### 1.3 Pre-application Community Consultation Documents

- 1.3.1 This statement should be read alongside the following supporting plans and documents:

- Suite of supporting plans
- Design and Access Statement
- Transport Assessment
- Arboricultural Impact Assessment
- Preliminary Ecological Assessment
- Flood Consequences Statement
- Outline Drainage Strategy
- Noise Impact Assessment

- Topographical Survey
- Phase 1 Geotechnical Investigations Report
- Community and Linguistic Impact Assessment
- Construction Environmental Management Plan

## 1.4 **Structure of Report**

1.4.1 The remainder of this report is structure as follows:

- **Section 2** outlines the project background to the proposals and the rationale;
- **Section 3** describes the existing site;
- **Section 4** provides details of the development proposals;
- **Section 5** provides the planning history for the site;
- **Section 6** identifies the development plan and national planning policies of relevance to the planning proposals;
- **Section 7** considers the proposal's compliance with national and local planning policy; and
- **Section 8** provides a summary of the key considerations for the proposals and conclusions

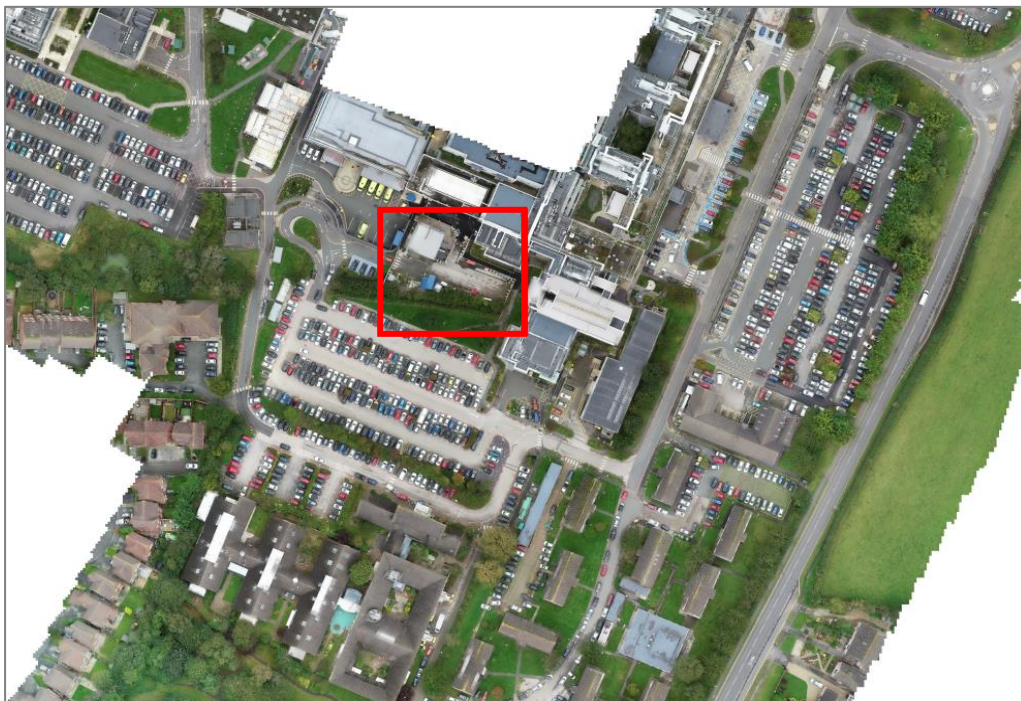
## 2 Background

- 2.1.1 Betsi Cadwaladr University Health Board as the applicant are seeking to bring forward development proposals within their Glan Clwyd Hospital campus to deliver a new Nuclear Medicine Facility.
- 2.1.2 Nuclear Medicine forms part of BCUHB's radiology service. Nuclear medicine is a specialised form of imaging involving the administration of small amounts of intravenously injected radioactive pharmaceuticals or radionuclides to patients. Both gamma cameras and PET-CT cameras (or scanners) produce images of injected radioactivity distributed through the body. The images produced depend on which tracers are used. Tracers have specific uses and target different processes that need to be examined. Generally, gamma cameras image lower energy radioactivity and cannot readily image the higher energies. Gamma cameras are used for a variety of scans including bone scans, heart perfusion scans, kidney scans and thyroid function. PET-CT scans image the higher energy radiation. They are mainly used as a primary diagnostic test and in treatment planning for certain indications in cancer but are also increasingly used in diagnosing neurological conditions and cardiac disease.
- 2.1.3 The Health Board currently operates its nuclear medicine services across their three main acute hospital sites. The intention is to bring forward investment in the health board's Nuclear Medicine capabilities through a new centre at Glan Clwyd. The new facility would provide an enhanced facility, capable of delivering improved levels of patient care. In delivering the project, there would be some consolidation of the health board's services in this field, with the relocation of some existing service elements from the Ysbyty Gwynedd and Wrexham Maelor sites.

## 3 Site Context

### 3.1 Site Description

- 3.1.1 The Glan Clwyd 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 are provided.
- 3.1.3 The planning proposals would involve developing on a single parcel of land, specifically on the land located immediately to the south of the main hospital building. The site location is identified in figure 1 below;



**Figure 1: Application Site**

- 3.1.4 The location for the proposed new building site is currently in ad-hoc use as a service yard and for the storage of equipment, the equipment on the site would be removed and located elsewhere to free up space for the development of the site.

- 3.1.5 The southern portion of the site also accommodates an open drainage ditch which would be required to be partly built over and therefore culverted. Sections of this drainage ditch are already culverted with it running underneath the access roadway to the west of the site.
- 3.1.6 In respect to the site's immediate surroundings, the hospital's A&E department and its entrance is to the northwest and the Cardiac Centre to the east. A surface car park is located to the south of the site.
- 3.1.7 The facility would be connected to the main hospital building through a corridor running north to south at the northern portion of the proposed building, allowing for staff, patients and visitors to walk seamlessly between the two buildings.
- 3.1.8 In terms of the site's wider context, the main hospital complex to the north comprises of a number of connected buildings of varying heights, the tallest being 5-storeys in height. The area to the south and southwest is characterised by low density residential dwellings that form part of the Bodelwyddan urban area and the A55 running east to west. Junction 25 on the A55 is a principal highway connecting settlements across Denbighshire and North Wales.
- 3.1.9 Outside of the hospital campus to the west, north and east are agricultural fields. Further to the north is the Faenol Fawr Country House and Manor Hotel complex. The Faenol Fawr building is a grade II\* listed building.
- 3.1.10 No part of the hospital campus is within a Conservation Area. The nearest is the Bodelwyddan Conservation Area located to the south of the hospital. This comprises historic properties at the southern end of Rhuddlan Road.



## 4 Proposed Development

4.1.1 The description of the development is as follows;

*"Outline permission (all matters reserved) for an extension to existing hospital to provide a Nuclear Medicine facility (Use Class C2) alongside associated landscaping and external works to provide additional car parking."*

### 4.1.2 Nuclear Medicine Facility

4.1.3 The proposals concern a new Nuclear Medicine facility that would accommodate regional radiology services and consolidate the Health Boards overall service provision in this field.

4.1.4 The new facility would principally accommodate two Gamma Camera rooms to conduct patient scans. The facility would also house a permanent PET/CT scan facility. The Health Board currently only offer access to PET/CT scans through a visiting scanning facility at Wrexham Maelor Hospital.

4.1.5 The proposals are to be presented through an outline planning application with all matters reserved. The detailed design for the building and its surrounding landscaping would therefore be provided at a later stage and would be the subject of a reserved matters planning application. Development parameters for the building as set out within the supporting plans.

4.1.6 Design development undertaken establishes that the facility would comprise of a single storey building with a ground floor floorspace of circa 800 sq.m, with a first floor plant room of circa 200 sq.m

4.1.7 The building would be linked to the main hospital complex via a corridor. There would be an external access at the west for deliveries and servicing.

4.1.8 The new building would principally accommodate;

- x2 Gamma camera scanning rooms;
- x1 PET/CT scanning room;
- Patient preparation rooms;
- Reception and patient waiting area;
- Staff areas/offices rooms;
- Adjacent accessible drop-off and servicing area.

4.1.9 As the facility would be used to process and undertaken patient appointments no hospital bed space would be created.

4.1.10 Aside from the building itself, the design proposals also incorporate landscaping works at the western portion of the site, primarily in the form of complementary planting. The proposals would include the building over of part of an existing drainage ditch to create the necessary footprint for the building.

4.1.11 The proposals would entail a small increase in the number of staff based at the hospital compared to the existing Nuclear Medicine service at the site. There would be a similar small increase in the number of visiting patients. At present 5 staff work within the Nuclear Medicine service at Glan Clwyd. This would be projected to increase by 13 members of staff (FTE). At present around 6 patients are normally seen across the day. The number of patient bookings would be projected to increase by circa 22 per day. Patient appointment would be spread out across the day.

## 4.2 Car Parking

4.2.1 To accommodate any uplift in demand for car parking at the site, the proposals would include provision for additional car parking spaces to be provided, commensurate to the proposals.

4.2.2 Opportunity to provide circa 25no. additional car parking spaces within the car park adjacent to the new building to the south has been identified. There would also potentially be opportunity for a drop-off bay and/or disabled spaces to be accommodated directly adjacent to the building.

4.2.3 It is intended that the final parking arrangements would be detailed and agreed at the reserved matters stage, although the locations for where additional car parking spaces could be accommodated has been indicated in the plans presented.

## 4.3 **Pre-Application Discussions**

4.3.1 Pre-application discussions with Denbighshire County Council's planning department were undertaken in between May and July of 2023. The pre-application process has aided in informing the requirements for the outline planning application.

## 4.4 **Community Consultation**

4.4.1 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 is being undertaken.

4.4.2 The community consultation will commence on the 11<sup>th</sup> September 2023 and close on the 8<sup>th</sup> October 2023. As part of this process the draft 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.

- 4.4.3 Key consultation material has been made available in the Welsh Language to ensure an inclusive consultation for Welsh speakers.
- 4.4.4 Full details of the consultation undertaken will subsequently be provided within a Pre-application Community Consultation Report.

## 5 Planning History

### 5.1 Site History

- 5.1.1 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. Recent 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 Planning Records

- 5.2.1 The hospital campus has had a number of planning permissions granted since its inception, both for the expansion to the number of buildings and car parking provision. Details of planning applications over recent years with relevance to the current application proposals are identified below:
- 5.2.2 **Reference – 40/2008/1195:** *'Construction of a temporary car park and associated road access for staff use.'* Granted, March 2009.
- 5.2.3 This permission relates to the construction of the 350 space surface car park in the south-western corner of the hospital campus.
- 5.2.4 **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.
- 5.2.5 **Reference – 40/2015/1131:** *'Construction of additional car park.'* Granted, March 2016.
- 5.2.6 This permission relates to the construction of a surface car park in the north-western part of the hospital campus.
- 5.2.7 **Reference – 40/2016/0109:** *'Continuation of use of temporary car park as a permanent car park.'* Granted, July 2016.
- 5.2.8 This permission relates to the permanent retention of the 350 space surface car park in the south-western corner of the hospital campus.
- 5.2.9 **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, January 2021.

- 5.2.10 This application relates to a refusal of permission for proposals for a replacement mental health unit and new multi-storey car park.
- 5.2.11 **Reference – 40/2023/0471:** *"Erection of new hospital unit (Use Class C2) including associated landscaping, car parking and site vehicular access and the erection of a multi-storey car park and associated works".*
- 5.2.12 This application is currently under consideration. The application relates to revised proposals for a new mental health unit and multi-storey car park.
- 5.2.13 **Reference – 40/2023/0331:** *"Erection of cancer support centre, formation of additional parking, landscaping and associated works."*
- 5.2.14 This application is currently under consideration.

## 6 Planning Policy Overview

- 6.1.1 This section outlines the key national and local planning policies and guidance of relevance to the proposals 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 With regard to 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 4.1.50 states that a design-led approach should be taken to the provision of car parking, which ensures an appropriate level of car parking 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.
- 6.2.16 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.

- 6.2.17 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.
- 6.2.18 Paragraph 5.8.1 identifies that the planning system should support new development that has very high energy performance.
- 6.2.19 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.

### **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.

### **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.

## **6.6 NHS Wales Policy – Decarbonisation Strategic Delivery (2021 – 2030)**

- 6.6.1 The NHS Wales Decarbonisation Strategic Delivery Plan responds to the Welsh Government's declared Climate Emergency, aligned to Welsh Government's goal for the public sector to be net zero by 2030. It establishes that carbon reduction will be a high priority in business case decision making for NHS capital investment projects. The Delivery Plan provides a commitment to incorporate the principles of sustainable transportation into the design of all new sites.

## **Local Planning Policy**

## **6.7 Local Development Plan**

- 6.7.1 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.
- 6.7.2 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.

## **6.8 Denbighshire Local Plan**

- 6.8.1 Strategic objective 12 of the Local Plan relates to infrastructure. It states that adequate levels of physical and community infrastructure will be provided alongside new developments. This is identified to include primary care facilities and community facilities.
- 6.8.2 Strategic objective 14 seeks to ensure that new developments are sustainable and are of a good quality of design.
- 6.8.3 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 land/buildings and the spaces around and between buildings;
  - Protecting and where possible enhancing the local natural and historic environment;
  - 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.

- 6.8.4 **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.
- 6.8.5 **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.
- 6.8.6 **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.
- 6.8.7 **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.
- 6.8.8 **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 healthcare 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. Part of the Glan Clwyd Hospital site is specifically allocated under this policy.
- 6.8.9 **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.
- 6.8.10 **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.

- 6.8.11 **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.
- 6.8.12 **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.
- 6.8.13 **Policy ASA 3** relates to parking standards and expects all developments to provide appropriate parking for cars and bicycles.

## 6.9 **Supplementary Planning Guidance**

- 6.9.1 To support the Local Development Plan, the Council have produced a series of Supplementary Planning Guidance (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;
- 6.9.2 **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 21 metres should be retained between the two windows.
- 6.9.3 **Parking Requirements in New Developments SPG** – The document provides detailed guidance with regard to the provision and composition of parking in new developments.
- 6.9.4 **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.
- 6.9.5 **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.

- 6.9.6 **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.
- 6.9.7 **Planning for Community Safety SPG** – This document supports LDP Policy RD1, providing guidance on good design in the context of community safety and crime prevention. The document identifies that planning for community safety should be incorporated into the design consideration process at the earliest possible opportunity, with consideration to design aspects such as natural surveillance, appropriate lighting and defined boundaries.

## 7 Compliance with Planning Policy

### 7.1 The Principle of Development

- 7.1.1 PPW 11 establishes, under 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 site forms part of the established Ysbyty Glan Clwyd Hospital estate within Bodelwyddan. The adopted local plan provides an allocation under **Policy BSC 12** at the hospital which supports the provision of new community facilities at the site in order to help ensure that the essential facilities to support the sustainability of Denbighshire's communities are provided. The policy outlines that health care provision is a key facility for communities and that the Primary Care Estates Strategy identifies for the development of new and improved health care sites in Bodelwyddan.
- 7.1.3 The proposed development plot represents previously developed land within the established development boundary of Bodelwyddan. Paragraph 3.55 of the PPW 11 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. It is considered therefore that PPW 11 is clear that the sustainable re-use of previously developed land should generally be considered suitable and supported.
- 7.1.4 The nuclear medicine facility would occupy an under-utilised outdoor storage area. It would not lead to any significant intensification of use at the hospital site which could not be appropriately managed. The new facility would operate on an appointment basis and consequently would not be providing any new hospital bed space. The development would help realise investment in the field of nuclear medicine for North Wales and provide the hospital with enhanced capabilities including a permanent PET/CT scanner, which it currently does not possess. Ultimately the new facility will allow the community greater access to a wider range of specialist health services within a best-in-class facility.
- 7.1.5 In view of the above, the principle of the development is supported by planning policies both within PPW and the adopted Local Plan.

### 7.2 Design and Landscaping

- 7.2.1 The proposals are being presented in outline and therefore the detailed design for the building and its surrounding landscaping will be further progressed and put forward at reserved matters stage. However, the building's proposed parameters are presented in the supporting

information to allow for an assessment to be made as to the acceptability of the proposed development “in principle”.

- 7.2.2 The supporting Design and Access Statement provides information on the key design principles to be employed at the site and the rationale for the design proposals.
- 7.2.3 A proposed '*Parameters Plan*' and '*Proposed Massing and Section Height*' drawings are provided as supporting information. These drawings would establish the development parameters which would define any outline planning permission. They indicate the extent of the development area for the building and its maximum height.
- 7.2.4 Principally, the facility would be built to accommodate two Gamma camera scanning rooms and a single PET/CT scan room. To support these facilities the emerging building design is anticipated to incorporate a number of patient preparation rooms and waiting areas, reception and staff areas and administrative offices. The building would be designed to adequately accommodate the required facilities.
- 7.2.5 The proposed building would comprise of a single storey accommodation of circa 800 sq.m with a first-floor plant area of circa 200 sq.m. The building would be no taller than the neighbouring cardiac centre to the east, or the main hospital complex to the north.
- 7.2.6 The internal environment is being designed with rooms positioned to offer a natural circulation route through the building as the patient passes between the reception, waiting room, preparatory room and the main scanning rooms.
- 7.2.7 Deliveries and waste will be administered through an entrance to the west of the building, minimising contact with patients. Deliveries and waste would enter and exit the site through the controlled barrier to the west, accessing the hospital campus' internal circulatory route.
- 7.2.8 An outline landscaping design is presented. New complementary landscaping, including shrub and tree planting could be incorporated to enhance the appearance of the development. Landscape features would predominantly run parallel to the southern boundary of the site alongside the adjacent car park. The loss of trees and hedgerow along the southern boundary of the building would primarily be mitigated through the planting of a new species rich hedgerow to the north and south of the ditch feature.
- 7.2.9 The drainage feature, of which the majority of the building will be constructed on top of, will still be retained at the southwest portion of the site. It is intended that any vegetation within the ditch can remain, this would however be subject to drainage and engineering works.

### 7.3 **Amenity**

#### Residential Amenity

- 7.3.1 The proposed building is situated approximately 110m from the closest neighbouring residential properties which are found at the Ffordd Parc Castell estate to the southwest. There are no other private residential properties sited in closer vicinity.
- 7.3.2 The building itself is not overbearing in nature and given its location and massing, will assimilate comfortably with the existing hospital campus. It is considered that the proposal 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 Campus

- 7.3.3 The facility would stand to the south of the main hospital building and to the south-east of the Accident and Emergency Department. To the east is the North Wales Cardiac Centre and to the south is one of the Hospital campus' main car parks. It is not anticipated that the proposed use would cause any amenity concerns for the surrounding hospital uses.

#### Noise

- 7.3.4 A Noise Impact Assessment has been undertaken and will accompany the outline planning application. The assessment demonstrates that any noise associated to the operation of the new facility can be suitably controlled and will not unduly impact upon the amenity enjoyed at any neighbouring properties.
- 7.3.5 The assessment conducted surveys at three different receptors, the site itself and at two locations reflective of neighbouring residential properties to the southwest. The assessment states that internal noise mitigation can be achieved through the incorporation of standard thermal double-glazed windows. Regarding the building producing noise externally, the assessment identifies the required plant as the main source of potential noise, for which noise performance can be controlled via a planning condition. The assessment concludes that the location is suitable for accommodating the proposed facility and noise should not be considered a determining factor in relation to the determination of the outline planning application.

### 7.4 **Transport**

#### Access and Highways

- 7.4.1 Principally, vehicle access would be provided by utilising the existing access route from the internal hospital access road which approaches the site to the west. Vehicle access to the



building would be provided through the main Ablett Unit car park to the south, with the approach provided by a small roundabout and slip road to the west of the site. Only minor alterations to the existing access arrangements would be required to provide servicing access to the rear of the building. Vehicles for servicing the building and for deliveries would be accommodated through a servicing bay to the west of the building.

7.4.2 The relatively minor increase to the number of staff who would be based at the hospital, and for the numbers of patient visits would not generate an extent of new vehicle trips which would result in any material impact upon the local highway network. The site represents a sustainable location, which is well served by public transport.

#### 7.4.3 Parking

7.4.4 The proposals identify for circa 25 additional car parking spaces to be created within the adjacent existing car park to the south of the proposed building. There would also be opportunity for a drop-off area and/or further accessible parking spaces to be provided adjacent to the building.

7.4.5 The extent of car parking provision proposed has been discussed at pre-application stage with the local planning authority and agreed in-principle.

7.4.6 The Council's car parking standards are outlined within the '*Parking Requirements in New Developments*' Supplementary Planning Guidance note. Within the document the parking standards applicable for 'Health Centres and Surgeries' is considered to be most applicable, on account that the proposed facility would see patients on an appointment basis. The standards indicated for which are as follows;

- Operational - 1 space per practitioner; and
- Non-operations - 1 space per ancillary staff and 3 spaces per practitioner.

7.4.7 Of the anticipated uplift of 13 staff, 6 have been anticipated as practitioner staff and 7 as ancillary staff. Against the parking standards this would equate to a maximum requirement for circa 26 spaces.

7.4.8 The parking provision to be proposed is therefore in accordance with the Council's car parking standards. It is intended that details for the final parking arrangements would be agreed at the reserved matters stage.

#### Sustainable Travel

7.4.9 The hospital site represents a sustainable and readily accessible location. This is evidenced as the Local Plan has designated the site to the east of the hospital as a strategic location,

anticipating new housing and employment uses within Bodelwyddan.

- 7.4.10 A number of local bus services can be accessed from the hospital which offer routes to many of the principal neighbouring conurbations. The nearest bus stop is located adjacent to the hospital's main entrance. From this location bus service nos. 13 (Prestatyn – Llandudno), 45 (Rhyl – Bodelwyddan), 51 (Denbigh – Rhyl) and 54 (St Asaph - Rhyl) can all be accessed, offering alternative travel opportunities to private car use.
- 7.4.11 The Health Board are continuing to explore various options to help aid easing parking demand at the hospital campus. This includes investigating options to allow for a park and rider service to be re-instated. This is an on-going process which is subject to a suitable and available site being secured and the necessary associated budgetary approval.
- 7.4.12 As part of efforts to reduce the carbon impact of the Health Board's activities and demand for parking, measures are also being looked at 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.
- 7.4.13 In terms of existing provision for access by pedestrians and bicycle, Rhuddlan Road presently offers shared pedestrian and cycling provision. It is also understood that a new Toucan crossing is proposed on Rhuddlan Road as part of the residential development which was recently provided planning permission at the neighbouring site to the eastern side of Rhuddlan Road.

## 7.5 Heritage

- 7.5.1 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.
- 7.5.2 All heritage assets within the wider 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. The development proposals would have no material impact upon any listed buildings, conservation areas or heritage assets.

## 7.6 Ecology

- 7.6.1 An Ecological Assessment has been undertaken for the site. The development will be located on land that has been previously developed on, with the southern area encompassing a dry ditch, amenity grassland, neutral grassland and dense shrub.
- 7.6.2 The site is not subject to any nature conservation designations, and it is not in close proximity to any protected site of ecological interest.

- 7.6.3 Surveys undertaken for great crested newts have determined that they are highly likely to be present on the wider hospital the site. The nearest confirmed breeding pond is located approximately 210 m to the north-west of the site propose for the nuclear medicine facility, beyond existing hospital development and access roads. There is limited terrestrial connectivity between this pond and the site of these proposals. Therefore, the assessment has determined that there will be no implications with regard to great crested newts anticipated from the proposed development.
- 7.6.4 No impacts on bats are expected as a result of the developments, this is owing to a lack of suitable roost features within the existing structures and the hedgerows and trees currently located on the site. A sole tree with the potential for bat roosting would be felled as part of the development process. This limited habitat loss can be mitigated for by the planting of replacement trees along the site's southern boundary or within the wider landscaping. Additionally, the assessment highlights that fact that there are a number of suitable bat foraging and commuting habitat across the rest of the hospital campus.
- 7.6.5 Water voles and invertebrates have previously been recorded on the site. However, it has been determined that water voles would experience little opportunity for foraging, commuting and burrowing on the site, particularly within the ditch on the site. No implications are to be expected with regards to water voles as a result of the development. The assessment indicates that there are opportunities to enhance the retained section of the ditch as water voles are known to be present across the wider catchment area.
- 7.6.6 The Assessment has determined that the site provides suitable foraging and sheltering opportunities for hedgehogs. These habitats will be partially lost to facilitate the proposed development, with small areas of amenity grassland, hedgerow and dense scrub habitat being retained. The loss however is not considered to be significant given the abundance of alternative habitats in the vicinity suitable for hedgehogs and the potential for mitigation measures to be incorporated.
- 7.6.7 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 and Local Plan Policies RD1 and VOE 5.

## **7.7 Arboriculture**

- 7.7.1 An Arboricultural Impact Assessment, produced by TEP accompanies the proposals. It sets out the arboricultural impact of developing the site as well as outlining any subsequent mitigation recommendations and protective measures.

- 7.7.2 The existing trees and vegetation on the site are confined to the southern edge of the proposed development area for the building.
- 7.7.3 The Impact Assessment confirms that there are no trees on or adjacent to the site that benefit from a Tree Preservation Order. There are also no veteran trees which could be affected by the development of the site.
- 7.7.4 To facilitate the development proposals one Category B tree would require removal. Two groups of Category C trees and a Category U tree would also require removal. These all currently stand within or adjacent to the drainage ditch on site.
- 7.7.5 Mitigation for the necessary tree removal could be provided for within the new landscaping scheme or within the wider hospital site.

## **7.8 Flood Risk and Drainage**

- 7.8.1 The Flood Consequences Assessment, produced by Ramboll, has concluded that the site is located entirely within TAN15 Zone A (Flood Zone 1). Therefore, the overall risk of flooding to the development is considered to be low and no mitigation against fluvial and tidal flooding has been proposed within the assessment.
- 7.8.2 The proposed development will be constructed atop of an existing drainage ditch that runs along the southern portion area to be developed. An increase in impermeable area resulting from the development over the existing permeable surfaces will increase the surface water discharge generated at the site.
- 7.8.3 In order to mitigate the potential increase in water discharge generated at the site, a proposed outline drainage strategy has been prepared by Ramboll. The strategy is set out in detail within the supporting drainage report.
- 7.8.4 It identifies that a drainage scheme can be incorporated included suitable attenuation tanks and flow control chambers to achieve drainage of the site with discharge restricted to greenfield rates.

## **7.9 Ground Investigations**

- 7.9.1 A Contaminated Land and Geotechnical Assessment has been produced by Ramboll. The assessment has determined that the risk to future site users and construction or maintenance workers has been assessed as moderate to low. The risk from ground contamination is also considered low to moderate.
- 7.9.2 The Assessment recommends that ground investigations should be undertaken to confirm the

ground conditions and risks from contamination and to inform the construction of the proposed development. This step can be undertaken at reserve matters stage.

## **7.10 Construction Management**

- 7.10.1 Early consideration has been provided to the management of any future construction activity at the site. An Environmental Construction Management Plan has been prepared which outlines how construction activity, including deliveries and the need for any constructor's site compound could be facilitated on the site to best limit any potential disturbance.

## **7.11 Welsh Language**

- 7.11.1 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.
- 7.11.2 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.
- 7.11.3 Principally, the proposals are for improved hospital facilities, which will provide critically important and advanced health care to support the local community and aid in consolidating the health boards radiology capabilities in North Wales. 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 Nuclear Medicine Facility.
- 7.11.4 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.

## 8 Conclusion

- 8.1.1 This Planning Statement has been prepared in support of outline proposals for the development of a new Nuclear Medicine Facility to enhance the radiology capabilities at Glan Clwyd Hospital.
- 8.1.2 The development would help realise investment in the field of nuclear medicine for North Wales and provide the hospital with enhanced capabilities. The new facility would provide the community with greater access to specialist health services within a best-in-class facility.
- 8.1.3 Both PPW and the adopted Local Plan identify the importance of providing adequate health facility infrastructure to meet the needs of communities. The proposals therefore are provided strong support through both national and local planning policy.
- 8.1.4 The location represents a sustainable location, which is well served by public transport. The proposals would be supported by the provision of a suitable number of additional car parking spaces within the hospital's campus, in-line with the Council's parking standards. The provision of a suitable number of additional car parking spaces would comfortably account for the relatively small increase in staff and patient visits which would arise at the site.
- 8.1.5 The proposed new building would be located on a plot of land positioned relatively centrally within the hospital campus which is currently being underutilised. The new building's proposed location would present no concerns for residential amenity, being located well away from any neighbouring residential properties.
- 8.1.6 The outline proposals are supported by a comprehensive suite of technical documents which together establish the acceptability of delivering the proposed development at the application site. Further design details and other considerations would be provided as part of a reserved matters application at a later stage.
- 8.1.7 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.