



**Planning Statement**

**in support of an application for**

**a Same Day Emergency Care Centre**

**at the Countess of Chester Hospital**

**Countess of Chester Health Park**

**Liverpool Road**

**Chester**

**CHX2 1UL**

## **1. Introduction**

- 1.1 The Countess of Chester Hospital provides acute emergency and elective services, primary care direct access services and obstetric services to a population of approximately 250,000 residents, mainly in Chester, its surrounding rural areas, Ellesmere Port and Neston and the Deeside area of Flintshire. The Accident and Emergency Service is a core service with operational dependencies on the other services the hospital provides.
- 1.2 The Same Day Emergency Care Centre ('the SDEC Centre') is required to improve the urgent and emergency care provision at the Countess of Chester Hospital. It will create a flexible space for the delivery of Same Day Emergency Care, where specialist staff from other departments will be brought together as needed to form multidisciplinary teams to treat patients. The Centre will provide a more efficient model for the delivery of urgent and emergency care and will improve the experience of all users of the hospital accident and emergency service (patients, visitors and staff). It will be a major improvement to a long established, strategic health facility.
- 1.3 The Centre will complement the existing Emergency Department by providing an alternative and more suitable facility for patients whose condition is not critical but who require urgent or emergency care. Where appropriate, in-coming patients (for example referrals from doctors' surgeries or NHS111 or on in-bound ambulances) can be diverted away from the Emergency Department to the SDEC Centre and patients already at the Emergency Department can be transferred across to it. This will relieve pressure on the Emergency Department services, to protect its focus on those in greatest need. Currently, sometimes, when the Emergency Department is under pressure and to maintain capacity for higher priority cases, the best course of action is to admit some other patients to the hospital. This then imposes additional demands on other departments, and it can be a more demanding experience for the patient. Being able to refer patients to the SDEC Centre will therefore also relieve pressure on other departments and, by retaining them as out-patients, offer a better experience for patients.
- 1.4 The operational effectiveness of the hospital and the experience of patients will also be improved by the access the SDEC Centre will provide to specialist diagnostic services. The Centre will be adjacent to the Radiology Department and will have some of the same diagnostic equipment as the Radiology Department. This adjacency will allow specialist diagnostic staff to move between the Radiology Department and the SDEC Centre. This will provide improved access to specialist diagnostic facilities for patients in need of urgent and emergency care, and at the same time will reduce the impact on patients scheduled to attend the Radiology Department. The Centre will also be close to, and will be linked to, the Out-patients Department, whose services will also sometimes be complementary to those of the Centre.
- 1.5 The SDEC Centre will also deliver the following benefits
  - Improve the patient experience, by delivering rapid assessment, diagnosis and initiation of treatment, by providing treatment in the most appropriate place and by reducing otherwise unnecessary hospital admissions.
  - Increased capacity, to meet today's and tomorrow's needs for urgent and emergency services, to meet the anticipated 3% growth in population over the next 15 years and the anticipated increase in the elderly demographic, to meet changing service models and to meet improved efficiency targets.

- Improved clinical adjacencies of services, to optimise clinical safety and reduce clinical risk.
- Improved environment for patients and their families, providing safe, fit for purpose facilities, and high quality, comfortable accommodation that protects privacy and dignity.
- Improved infection prevention, by developing the department to allow for social distancing, and ease of cleaning.
- Improved referral pathways, to assist Primary Care and to allow treatment, where safe to do so, in the community.
- Avoidance of unplanned and longer than necessary stays in hospital, resulting in lower risk of infections and de-conditioning for patients.
- Improved efficiency (via elimination of duplication caused by service separation), improved adjacencies, improved service through-put, and improved service targets.
- Improved working environment, creating a modern, safe and fit for purpose working environment for staff, and facilities that are compliant with today's NHS standards and regulations, to minimise clinical risks and provide additional space within which to care for patients.
- The promotion of joint effective working across the care network.
- New equipment and software, to help facilitate integration across the care network and to provide strong, resilient technical capacity to maintain and develop the service and provide sustainability.
- Financial benefits and cost savings for the hospital, and often for patients too (by reducing the need to make repeat visits for treatment).

## **2. Site description**

- 2.1 The Countess of Chester Health Park is an established and extensive health care facility on the north side of Chester. The site lies adjacent to the policy defined settlement boundary to the City and is a designated in the Local Plan as a commercial site in the green belt.
- 2.2 The application site lies within the southern part of the hospital complex, within a courtyard that provides parking and access to a range of existing buildings, including the main entrance to the accident and emergency department. The application site is located in the western part of this courtyard, on ground currently used for parking and circulation.
- 2.3 There is a gentle fall in ground level across the courtyard, from south to north. There are strips of amenity planting around the existing car park edge, and two small, ornamental trees in the north west corner.

### **3. Proposal**

- 3.1 The application seeks full planning permission for a new building to accommodate the Same Day Emergency Care Centre. The formal description of development is as follows

*The construction of a part single storey, part two storey hospital building with associated landscape works, including the construction of a new link bridge connecting the first floor of the new building with the neighbouring building to the west, and the demolition of an existing single storey extension to make way for the construction of a single storey link extension connecting the ground floor of the new building with the neighbouring building to the north.*

- 3.2 Full details are expressed in the accompanying plans and are introduced and explained in more detail by the Design and Access Statement, the information herein and the other supporting documents.

- 3.3 In summary, the principal components comprise the following

- Construction of a new building of approximately 2,729 square metres (gross internal area): part single storey, part two storey, with a higher section in the north east corner to accommodate access to the roof area. The new building will be linked to the existing Emergency Care department at ground floor level and to the Out-Patients Department at first floor level, via a link bridge.
- Within a small courtyard on the western side of the Emergency Department, a small single storey extension will be demolished and the courtyard will then be infilled, primarily to create a link extension between the SDEC building and the Emergency Department, and partly to create some additional ancillary facilities. See Existing Site Plan, drawing number DR-L-1000 Rev P1 for the demolition and GA Plan – Ground Floor, drawing number DR-A-2001 Rev P4 for the infill extension.
- Various hard and soft landscape works arising from the construction of the new building, including realigning an internal access road, creating a new parking bay for the mobile MRI Truck Scanner.
- Re-organising existing car parking bays elsewhere on the Health Park to accommodate spaces displaced by the new building.

### **4. Relevant planning history**

- 4.1 The site has an extensive planning history charting various phases of expansion and modernisation over the decades. Of most relevance is application 18/03540/FUL, which relates to the grant of planning permission in 2018 for the construction of the improved accident and emergency entrance.

### **5. Planning Policy Assessment**

#### ***Relevant Planning Policy***

- 5.1 The relevant development plan is the Cheshire West and Chester Local Plan (Parts One and Two).

- 5.2 Of relevance as a material consideration is the National Planning Policy Framework ('the Framework') and Planning Practice Guidance, including emerging guidance.
- 5.3 Local supplementary planning guidance on car parking standards.
- 5.4 The emerging Upton-by-Chester Neighbourhood Plan, which is a material consideration albeit of limited weight in accordance with the stage of preparation it has reached.

***Suitability of the proposed location***

- 5.5 The Health Park lies outside the policy defined settlement boundary map line to the City of Chester, on land designated as countryside in the Local Plan. Under Part One Policy STRAT9 (green belt and countryside), development within the countryside will be permitted where it has an operational need for a countryside location. The proposed development meets this requirement, as the following explains.
- 5.6 The benefits the SDEC Centre offers (see introduction) could not be achieved were the facility located at another site, or indeed if it were located elsewhere on the Health Park. The proposed location is the best location within the Health Park for the SDEC Centre because of the proximity to the diagnostic specialists in the adjacent Radiology Department and to be able to receive patients direct from the Emergency Department. The new building is therefore required at this location, within the 'countryside', and could not be located elsewhere (within an identified settlement). As such, it satisfies the criteria in the first paragraph of Part One Policy STRAT9, and the first bullet point of the second paragraph.
- 5.7 The Health Park is located within the green belt. Part One Policy STRAT9 sets out that restrictions will apply to development in the green belt, in line with the National Planning Policy Framework. Paragraph 145 of the Framework sets out exceptions to when local planning authorities should regard the construction of new buildings as inappropriate in the green belt, one of which (paragraph 'g') is the limited infilling of previously developed land which would not have a greater impact on the openness of the green belt than the existing development. The proposed development meets this requirement, as the following explains.
- 5.8 The wider Health Park complex reads as a substantial and distinctive group of buildings, and those around the courtyard read as a distinct group within that wider complex. This courtyard has a strongly developed appearance, which results from the combination of the extent, layout, scale and mass of the existing buildings (especially on the north and west side), the extensive space given over to vehicle parking and circulation areas and the limited, ornamental character of the soft landscaped areas. The west side of this courtyard is seen and experienced in this immediate context, as well as being readily perceived to be part of the wider developed area of the Health Park. The location for the proposed building is well integrated with and is visually contained by the existing complex of buildings. The introduction of development into this area of the courtyard will not result in any encroachment into the open countryside and it will be readily understood and viewed as part of the existing complex of buildings within which it will be set. The proposed development therefore qualifies to be treated as limited infilling of previously developed land, in accordance with paragraph 145(g) of the Framework.

- 5.9 Paragraph 145(g) of the Framework also requires that infill development has no greater impact on the openness of the green belt than the existing development. The SDEC building would not do so, as the following explains.
- 5.10 In spatial terms, the SDEC building will be located within an enclosed courtyard on a major developed site. It will be close to the existing buildings that form the north and west sides of the courtyard; it has to be because of the need to be physically linked to both. A series of plant and service areas and a line of mature trees provide enclosure to the south side of the courtyard. The east side is enclosed by the Women and Children's Building. The SDEC building will be of comparable height and mass with the existing complex of buildings to its west and stretching away to its north. Its scale will be experienced in the immediate context of the courtyard but less so within wider context of the Health Park, against which it will be seen as relatively modest. Its built form would add little to the existing perception of the built up and urbanised character of the Health Park and so spatially it would have no greater impact on the openness of the wider green belt.
- 5.11 In visual terms, the SDEC building would have little presence outside of the courtyard. From the north and west the building would be completely screened by existing hospital buildings. In views from the south or east it will be seen against the existing complex of buildings to its west and stretching away to its north. Views from the east are only really gained from within the courtyard. Beyond it, views in from the east are confined to a relatively small window in the north east corner of the courtyard, framed by nearer buildings to north and south and by the link bridge between the main hospital and the Women and Children's Building. From outside the Health Park, from Liverpool Road, there would be no perceptible visual impact. From the south the tree line along the south side of the courtyard will filter views of the building from the car park and from beyond that there would be little or no views.
- 5.12 The photographs below show existing views from the south, south east and east.

Photo 1 – View from car park to south, looking north toward site





Photo 2 – View from south east corner of courtyard, looking north west toward site



Photo 3 – View from the east, looking west into the courtyard, toward the site



- 5.13 The proposed site for the SDEC building is therefore generally well screened, and is completely screened from the wider countryside and green belt beyond to the west and north. Where views would exist of the building it would be seen in the context of the wider Health Park. It will add to this existing complex but would not result in any additional, visual encroachment into the wider countryside and would be visually

contained within the existing built up area of the Health Park, and indeed of the courtyard. There would be a change in the appearance of the courtyard but against the scale of the Health Park this would be limited. Given the contained nature of the development site there would be no additional visual impact on the wider green belt.

- 5.14 So, in both spatial and visual terms the SDEC building would have no greater impact on the openness of the green belt than the existing development. As such it accords with paragraph 145(g) of the Framework and Part One Policy STRAT9, and is not inappropriate development in the green belt.
- 5.15 In light of the conclusion that the proposal is not inappropriate development, it is not necessary to consider whether there are very special circumstances, to clearly outweigh any potential harm to the green belt by reason of inappropriateness, and any other harm. Notwithstanding that, and as set out above in the Introduction, the proposed development will deliver very substantial public health benefits to the community of west Cheshire and beyond, and significant operational improvements for the hospital. If needed, these would be very special circumstances, to which very great weight should be given, and which would be more than enough to clearly outweigh any finding of potential harm.
- 5.16 Part Two Policy GBC1 (commercial sites in the green belt) identifies various major developed sites and confirms proposals will be supported which meet the terms of Framework paragraph 145(g). It identifies the Countess of Chester Health Park as one such site, where the principle of development for medical and associated purposes will be supported. The SDEC building will be located within the Health Park area as defined on the Local Plan Proposals Map. It will accommodate services dedicated to medical purposes, delivering operational improvements to the primary use of the site. The new and improved medical facilities will benefit the health and well-being of residents across west Cheshire. As such the proposals have in principle support from Part Two Policy GBC1.B (Countess of Chester Health Park) and also from Part One Policy SOC5 (health and well-being). This finding is reinforced by the Framework, which say at paragraph 92(b), to provide the social facilities and services the community needs, planning decisions should support the delivery of local strategies to improve health.
- 5.17 Part Two Policy DM39 (culture and community facilities) supports proposals for clearly justified healthcare facilities in the local community. Having regard to the public health benefits to the community of the proposed SDEC Centre, it is considered to excel in meeting this requirement.
- 5.18 Part One Policy STRAT2 (strategic development) sets out a strategic development hierarchy, recognising the majority of new development will located within or on the edge of the main conurbations, including Chester. The proposed development will maximise use of existing infrastructure and resources, is close to some of the Borough's main population centres and is accessible by public transport (see section below on Travel, Servicing and Parking). As such the proposed development is in accordance with Part One Policy STRAT2.
- 5.19 It is noted the emerging Upton-by-Chester Neighbourhood Plan Design Code draft policy N1 (land uses, centres and facilities) supports the function of the hospital.



### ***Design and sustainable construction***

- 5.20 Visually, the SDEC building will relate well to the adjacent and nearby buildings, in terms of its siting, scale and design. The external appearance will achieve a high standard of finish and in wider visual terms is low key. It relates most strongly to the Emergency Department, without appearing discordant alongside the broader mix of styles seen in the other buildings. As such the proposed development is in accordance with Part Two Policy DM3 (design, character and visual amenity).
- 5.21 The proposed development is projected to achieve a BREEAM rating of 'excellent' and as such is in accordance with Part Two Policy DM4 (sustainable construction).
- 5.22 Part One Policy ENV6 (high quality design and sustainable construction) promotes sustainable, high quality design and construction. The Design and Access Statement sets out the rationale behind the design of the SDEC building, showing how the proposed building will be a respectful addition to the existing, diverse family of buildings on the Health Park, including through the use of high quality materials that complement the pallet of the surrounding buildings. The proposed east facing main entrance will continue to reinforce the courtyard's sense of place and the legibility of the space. The courtyard is a private space to which the public have access, as distinct from being part of the public realm. The proposal will have no impact on the public realm, such as Liverpool Road. There are no designated or non-designated heritage, environmental or landscape assets in the vicinity of the proposed building. The building will be fully screened from the Countess of Chester Country Park, to the west, by existing hospital buildings. The building will ensure ease of movement and will prioritise access for pedestrians and cyclists because it will have good access to the existing network of pavements and footpaths within the site, that link to the car parks, public transport stops and on site cycle parking bays. It will also benefit from its ready accessibility via the existing safe, secure access routes to and around the Health Park. Waste generated from the activities in the building will enter into established waste streams across the site. By its nature, as a specialist urgent and emergency medical care facility, it would not be appropriate for the project to include for a diversity and mix of uses. The building is designed to be energy and resource efficient (to achieve the BREEAM excellent rating), which will also mitigate its impact on climate change. The design and construction will meet applicable nationally described standards for urgent and emergency care facilities.
- 5.23 The development site is given over to vehicle access and parking, with limited ornamental landscaping. There are no features of notable landscape quality which merit retention. Where possible existing areas of planting will be retained and augmented and trees lost can be replaced elsewhere, to ensure no net loss within the Health Park. Views into, over and out of the site have been dealt with above in relation to the assessment of the impact on green belt and countryside. As such the proposed scheme is compatible with Part One Policy ENV2 (landscape). The Ecological Site Assessment by Envirotech reviewed the ecological value of the development location. Existing 'invasive' species can be removed and replaced with more appropriate species. There would be no loss of natural assets, other than the small trees, which will be replaced at a ratio of two new trees for each tree lost. As such the proposal is compatible with Part Two Policies DM44 (protecting and enhancing the natural environment) and DM45 (trees, woodland and hedgerows).
- 5.24 The application is accompanied by a below ground drainage strategy. The site location is predominantly hard surfaced with only marginal areas of soft landscaping. The introduction of the building will therefore have little net impact in terms of hard surface area. Means of disposing with the discharge of surface water run-off are set

out in the drainage strategy, demonstrating compliance with Part One Policy ENV1 (flood risk and water management). The system proposed would incorporate a sustainable drainage solution (see section 8.5 of the Below Ground Drainage Strategy by Ramboll, January 2021), in accordance with Part Two Policy DM41 (sustainable drainage systems).

- 5.25 Given the proposed development does not conflict with other relevant development plan policies, that it would involve the development of previously developed land, that it would not be appropriate for it to include a mix of uses and its density fully respects the existing character and layout of the location while making maximum use of land, it is also in accordance with Part Two Policy DM1 (development of previously developed land).
- 5.26 The Local Plan seeks to enable development that improves and meets the economic, social and environmental objectives of the borough in line with the presumption in favour of sustainable development. Part One Policy STRAT1 (sustainable development) sets out a range of sustainable development principles which proposals should support. Taking those principles in turn the following submissions are made
- The scheme will seek to mitigate and adapt to the effects of climate change by means set out in the BREEAM assessment.
  - By its nature, as a specialist urgent and emergency medical care facility, it would not be appropriate for the project to include for a diversity and mix of uses.
  - The proposal does not include any element of residential development.
  - The scheme will protect the natural and historic environment, with any impact on the natural environment at the development site being off-set by initiatives elsewhere within the Health Park, to achieve a net gain in biodiversity.
  - The proposal is for the redevelopment of previously developed land of low environmental value, in a sustainable location.
  - There would be no loss of or threat to greenfield land or high grade agricultural land.
  - In as much as there is a modest increase in employment at the site, these roles will be created at a location which is highly accessible by non-car modes of travel. (Part One Policy ECON1 (economic growth, employment and enterprise) supports the creation of new job opportunities across a range of sectors.)
  - The project will make prudent use of natural resources and promote energy efficiency, as set out in the BREEAM assessment.
- 5.27 Overall, the proposed scheme is in accordance with the relevant development plan policies, (as set out further above and below), and with the relevant sustainable development principles, (above). As such, and in accordance with Part One Policy STRAT1, the proposals should be approved without delay.
- 5.28 Part One Policy STRAT11 (infrastructure) sets out how the Council will facilitate the timely provision of facilities to meet identified needs from the existing community, in locations that are appropriate and accessible. The supporting text to the Policy

confirms that health and well-being facilities are encompassed by its terms. The SDEC Centre will be appropriately located, at an existing hospital, and will be highly accessible by different modes of travel, including non-car modes. As such, the Council should facilitate the timely provision of this facility.

### ***Travel, servicing and parking***

- 5.29 Part One Policy STRAT10 (transport and accessibility) sets out the Council's approach to assessing the travel and transport implications of new development and is supplemented by Part Two Policy T5 (parking and access). The proposed development will be at a location which is already readily accessible by different transport modes. The Health Park is well served by public transport, with regular bus services on Liverpool Road in particular, and Bache station a little over a 300m walk away.
- 5.30 The SDEC Centre has two principal user groups: patients (with accompanying visitors) and staff.
- 5.31 The purpose of the SDEC Centre is to treat people who would already be attending the hospital for urgent and emergency treatment. It will not attract additional visits; patients must be referred to the Centre and it will not be open to members of the public on a 'walk-in' basis. In fact, it is expected to result in some reduction in the number of times a patient needs to travel to the Health Park. By delivering more services in fewer visits (if not just one), it will sometimes avoid the need to ask patients to return for out-patient appointments at other departments. As such, the facility will not generate a material change in patient travel to and from the site.
- 5.32 Nor will the facility generate a significant change in staff travel movements to and from the site. The objective is to provide a central location where patients can be seen by relevant staff from within the hospital. There will be a need for some additional medical and support staffing (4no. full time equivalent). In the context of the number of staff employed at the Health Park as a whole, this increase is not significant.
- 5.33 The proposed development will displace a number of parking bays allocated for those who are disabled. These will be re-provided for within existing car park areas, by re-allocating general spaces for use by those who are disabled. The general parking bays displaced by this and any demand from the additional staffing, can be accommodated by existing capacity within the 'overflow' car park.
- 5.34 Existing access roads to the south and west sides of the courtyard will be retained and will continue to provide access, including for meeting any servicing needs. Waste will be segregated and stored within the SDEC building before periodic transfer to central, site, waste storage facilities, from where regular removal is undertaken by commercial waste removal contractors. This includes small amounts of hazardous waste of various types. The applicant has a 'Healthcare Waste Policy' which provides detailed instructions for site operatives on the segregation and storage of hazardous (and non-hazardous) waste. The instructions identify (for all types of waste) which specific type of receptacle specific types of material must be stored in, the type of container they must be transferred to and the method of disposal.

### ***Health and well-being***

- 5.35 There are no residential properties in close proximity to the proposed building. The nearest is nearly a hundred metres away on the Bache Hall estate. There is sufficient

physical separation and intervening development for there to be no impact on nearby residents, whether by reason of outlook, privacy, light, odour or noise; there are no significant light, odour or noise sources associated with the building. As such the proposed development complies with Part Two Policy DM2 (impact on residential amenity) and Part One Policy SOC5 (health and well-being).

- 5.36 The application is accompanied by a Health Impact Assessment, which did not identify any significant negative impacts. Overall, the SDEC Centre is expected to have significant positive health and well-being impacts and as such is in accordance with Part Two Policy DM29 (health impacts of new development).

## **6. Conclusion**

The development is not inappropriate development in the green belt and no material harm arises from any other consideration. The proposal is in accordance with the development plan as a whole, and the Framework, and there are no material considerations that indicate a decision should be made other than in accordance with the development plan.

Accordingly, the Council is respectfully requested to grant planning permission.

### **Statement prepared by**

**Adrian Thompson MRTPI**

**Director, Lightwater TPC**

**25 January 2021**

