

PLANNING SUPPORT STATEMENT

Proposed provision of a seclusion block and associated works adjacent to Oak Ward



**The Redwoods Centre, Somerby Drive, Bicton Heath,
Shrewsbury SY3 8DS**

**On behalf of Midlands Partnership NHS Foundation
Trust**

Our Reference: 21029 PSS DC
Planning Portal Reference: PP-10149257

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Table of Contents

- 1. Introduction 1
 - Planning Application Content 1
- 2. The Application Site and Surrounding Context 4
- 3. The Proposed Development..... 6
- 4. Planning Policy Context 9
- 5. Planning Appraisal 16
- 6. Planning Obligations 22
- 7. Summary and Conclusion 23

1. Introduction

- 1.1. This Planning Support Statement has been prepared on behalf of the Midlands Partnership NHS Trust to inform preparation of an application for full planning permission for a new seclusion block and associated external works (the proposed development) at Oak Ward, Redwoods Centre, Somerby Drive, Bicton Heath, Shrewsbury SY3 8DS.
- 1.2. The Redwoods Centre is a purpose built, inpatient facility which opened in September 2012. It is located in Shrewsbury providing services to the people of Shropshire and Telford & Wrekin. Comprising of main four buildings including Oak and Laurel Wards. The centre provides 80 beds for adults with acute mental health problems, dementia and rehabilitation needs, as well as a 32-bed low secure forensic unit and 2 beds for the 136-assessment unit.
- 1.3. The Redwoods Centre is located to the west of Shrewsbury Hospital and lies approximately 3km west of Shrewsbury town centre. To the north, west and south lie areas broadly residential in character.
- 1.4. The Redwood Centre site extends to 6 hectares and the proposed application site is land situated wholly within its grounds. The area within the red line (excluding the access via the perimeter road) is 392m² and the new buildings have a total ground external floor area of 110m². In addition, there are external works including a secure garden of 20m², a secure outdoor vehicular drop-off of 36m² and a secure staff breakout area of 24m².
- 1.5. The application site falls within the administrative boundaries of Shropshire Council (SC) which is the determining authority for the planning application. Due to the small scale of the application proposal no public consultation has taken place prior to submission of the planning application.

Planning Application Content

- 1.6. The planning application comprises the following:
- 1.7. Planning Application Form and Certificates
 - Planning Support Statement, prepared by the Tyler Parkes Partnership Ltd. In addition, the addressing the main planning issues this document also covers other matters that are required for validation including nature conservation and biodiversity, contamination, flood risk, surface water drainage and waste.
 - Design and Access Statement, prepared by Gilling Dod Architects. This document includes photographs of the site as existing as well as 3D illustrations of the proposed development.
 - Completed Sustainability Checklist compiled by Tyler Parkes Partnership Ltd.
 - Waste Audit Statement compiled by Tyler Parkes Partnership Ltd.
 - Preferred Option 8 Phase 2b Geo-Environmental Site Assessment, Shelton

Mental Health Hospital, Shrewsbury by Clarke Bond Consulting Engineers May 2010 Contamination Phase. This report investigated contamination on the whole of the Redwoods Centre prior to its construction.

- Redwoods Centre, Somerby Drive, Shrewsbury Phase I Desk Study Appraisal and Review for Alan Johnson Partnership Ltd by GRM, July 2021. This report assesses the current geotechnical and geoenvironmental setting of the application proposals in respect of contamination, ground gas requirements and foundations.
- Soft Landscaping Plan prepared by Danielle Jaynes Landscape Design and Ecology Services.
- The following drawings prepared by Gilling Dod Architects:

Drawing Reference	Title
OWMPFT-GDA-V1-00-DR-A-10_10-0001_P02	Location Plan
OWMPFT-GDA-V1-00-DR-A-10_10-0003_P02	Proposed Site Layout Plan
OWMPFT-GDA-V1-00-DR-A-05_20-0006_P02	Existing Ground Floor Plan
OWMPFT-GDA-V1-ZZ-DR-A-10_20-0002_P02	Existing Elevations
OWMPFT-GDA-V1-R1-DR-A-05_20-0008_P02	Existing Roof Plan
OWMPFT-GDA-V1-00-DR-A-05_20-0001_P04	Proposed Ground Floor Plan
OWMPFT-GDA-V1-01-DR-A-05_20-0005_P03	Proposed Plant Room
OWMPFT-GDA-V1-R1-DR-A-05_20-0009_P03	Proposed Roof Plan
OWMPFT-GDA-V1-ZZ-DR-A-05_20-0002_P04	Proposed Elevations
OWMPFT-GDA-V1-ZZ-DR-A-05_20-0004_P02	Proposed 3D Views
OWMPFT-AJP-V1-ZZ-DR-C-001000-T02	Drainage Layout
OWMPFT-AJP-V1-ZZ-DR-C-001400-T03	External Works Layout
OWMPFT-AJP-V1-ZZ-DR-C-001500-T03	Tracking Layout

The Purpose and Structure of this Planning Support Statement

- 1.8. The purpose of this Planning Support Statement is to set out the relevant matters, taking account of the local validation checklist, with regards the determination of the planning application. The Planning Statement is not intended to duplicate matters referred to elsewhere (i.e., the application drawings and/or supporting statements); rather it draws together details and provides an overview of the application site, proposed development and planning matters.
- 1.9. This Planning Support Statement is structured as follows:
 - **Chapter 1: Introduction (this Chapter)** – Introduces the planning application, applicant, the proposed development, application site and sets out the

documents forming the planning application.

- **Chapter 2: Application Site and Surrounding Context** – Provides a description of the application site, relevant planning history and the surrounding context.
- **Chapter 3: The Proposed Development** – Provides a summary of proposed development as supported by the planning application drawings.
- **Chapter 4: Planning Policy Context** – Provides a summary of the key relevant planning legislation, policy and guidance at a national and local level comprising the Development Plan and other material planning considerations.
- **Chapter 5: Planning Considerations** – Appraises the proposed development in the context of the Development Plan and other material planning considerations.
- **Chapter 6: Community Infrastructure Levy / S106 Obligations** – Sets out any requirements under the adopted Community Infrastructure Levy and/or any heads of terms in respect of S106 obligations, where necessary, or confirms not required.
- **Chapter 7: Summary and Conclusion** – Provides a summary of the key findings from this Planning Support Statement.

2. The Application Site and Surrounding Context

The Application Site

- 2.1. The site for the new seclusion unit is located to the rear of the existing Oak and Laurel Wards. This area is currently an open, grassed and landscaped area forming part of a wider landscaped garden setting to the Redwoods Centre.



The site of the proposed seclusion unit showing the gable ends of Oak Ward (left) and Laurel (right).

Surrounding Context

- 2.2. The immediate surroundings comprise the landscaping area to the south of Oak and Laurel Wards. This area includes landscaped bunds, footpaths and the perimeter road serving the site. While this green area is not public open space it is used by members of the public for walking dogs and so on. This helps to ensure the hospital is embedded within the wider community. The landscaped area rises towards Racecourse Lane. The boundary of the site with Racecourse Lane is marked by a high, dense hedgerow.
- 2.3. Beyond the land comprising the Redwoods Centre the closest adjoining uses are residential and include a single row of 4 pairs of semi-detached dwellings on Wellwood Close and a row of detached properties overlooking the Redwoods Centre on the western side of Racecourse Lane. The dwellings on Racecourse Lane are at a higher level than the proposed new building.

Relevant Planning History

- 2.4. The Redwoods Centre was opened in 2012. The proposed seclusion unit represents

a relatively small but important addition to the range of services at the facility. Here, only the planning history relating to the Redwoods Centre is highlighted:

Ref. No: 21/02624/FUL, Creation of 82 additional car parking spaces, and 5 bicycle stands (creating 20 new cycle spaces), plus associated alterations to soft and hard landscaping. Status: Pending Consideration.

Ref. No: 20/05066/FUL, Creation of 82 additional car parking spaces, and 5 bicycle stands (creating 10 new cycle spaces), plus associated alterations to soft and hard landscaping. Status: Withdrawn.

Ref: 17/00042/FUL. Erection of single storey pitched roof extension to provide two new assessment rooms and shower. Status: Granted.

Ref: 15/01633/FUL. Addition to existing 1800m timber boarded fence to Laurel Ward by extending up by 1200mm with security mesh fence. Status: Granted.

Ref: 15/01655/AMP. Amendments to Planning Application 13/04361/FUL for the removal of existing 180cm Timber fence and replacing with 300cm high security fencing. Status: Granted.

Ref 13/04361/FUL. Wrekin Building Removal of existing 180cm Timber fence and replacing with 300cm high security fencing. Status: Granted.

Ref: 12/02241/AMP. Application for Non Material Amendment - for extension to Low Secure Unit day lounge (Northern Wing) to provide improved visibility onto courtyard and improved internal layout attached to planning permission 10/03539/REM - Approval of Reserved Matters (layout, scale, appearance and landscaping) pursuant to outline permission 09/02282/OUT (granted 10.08.2010) for the erection of mental health in-patient building; construction of car park; provision of open space; landscaping and means of access. Status: Granted.

Ref: 10/03539/REM. Approval of Reserved Matters layout, scale, appearance and landscaping) pursuant to outline permission 09/02282/OUT for the erection of mental health in-patient building, construction of car park and provision of open space; landscaping and means of access. Status: Granted.

Ref: 09/02282/OUT Outline application for the erection of new mental health in-patient building, construction of car park and provision of open space and landscaping to include means of access. Status: Granted.

3. The Proposed Development

The Proposals

- 3.1. The proposed development would comprise linking together Oak and Laurel Wards and the provision of a new one-bedroom seclusion unit with room for plant in the roof space. The seclusion unit will be accessed both from the new link and accessed as well as from a new secure external access. The new access will be linked to the existing perimeter road and provision to enable the vehicle accessing the secure area to safely reverse-in and then drive out in forward gear. The new access will involve cutting through the existing grassed area lying between the footpath and the perimeter road. In addition, the external works will provide for a secure garden area for the patient occupying the seclusion unit as well as a secure access for both pedestrian and vehicle access. These features require the provision of secure fencing and gates.
- 3.2. The purpose of the proposed development is to improve the facilities to deliver safe patient care. The scheme would provide a seclusion and de-escalation suite to allow patients in an escalating state of crisis to be safely managed. The site does not currently have this facility for mental health patients however there is a growing, and recognised need for dedicated seclusion facilities to be provided. The need is being driven by a changing presentation and increased acuity of patients who are being admitted into the Mental Health service. With the changing presentation of the patients being admitted to the service, there is an increased need to contain some of the high-risk behaviours that are being displayed. The proposed seclusion suite will allow such patients to be contained in a specific area – which is less restrictive and risky to patients and staff – as opposed to needing to restrain patients.
- 3.3. The Trust currently has dedicated seclusion rooms located in Yew Ward within the Clee Building at the Redwoods Centre and in Newport House in the Hatherton Centre in Stafford. For the Oak, Laurel and Birch patients to use these facilities they would have to temporarily be transferred into a custodial setting which they are not required to be in. A further facility has recently been granted planning permission on the St Georges site in Stafford. For Oak, Laurel and Birch patients to use this facility they would have to be transported 35 miles whilst in a state of crisis, posing a threat to themselves and accompanying staff and drivers for the duration and transfer. This would also then block the Norbury patients at St Georges from using their facility. The addition of a further seclusion unit at the Redwoods Centre contributes in this context.
- 3.4. In addition, the COVID-19 crisis has highlighted the increased potential risk around the transfer of patients since there is insufficient time to test patients and receive the results prior to movement, due to the immediacy of the need to access seclusion facilities. Whilst patients are tested upon admission and if they display Covid-19 symptoms, such transfers create an unnecessary risk to staff and patients. To mitigate this risk, the Trust is seeking to provide further dedicated facilities on the ward, requiring no transfer. The provision of a seclusion suite at Oak Ward would also allow for the safer isolation of COVID-19 patients who present as a specific increased risk of transmission to others as a result of their mental state.
- 3.5. The new seclusion and de-escalation facilities would meet modern best practice standards including Guidance produced in 2017 by the National Association of Psychiatric Intensive Care Units and Design in Mental Health (DIMH) and be used in line with all relevant mental health guidance including the Mental Health Act 1983

Code of Practice.

- 3.6. The new building will also provide improved facilities including an entrance lobby and store, and other internal changes including direct access to the adjacent Oak and Laurel Wards to enhance operations.
- 3.7. The proposals also incorporate a dedicated plant room facility in the roof space. This will help to reduce the number of occasions where operatives need to access plant from within the ward which is both logistically problematic and can be disturbing to patients.

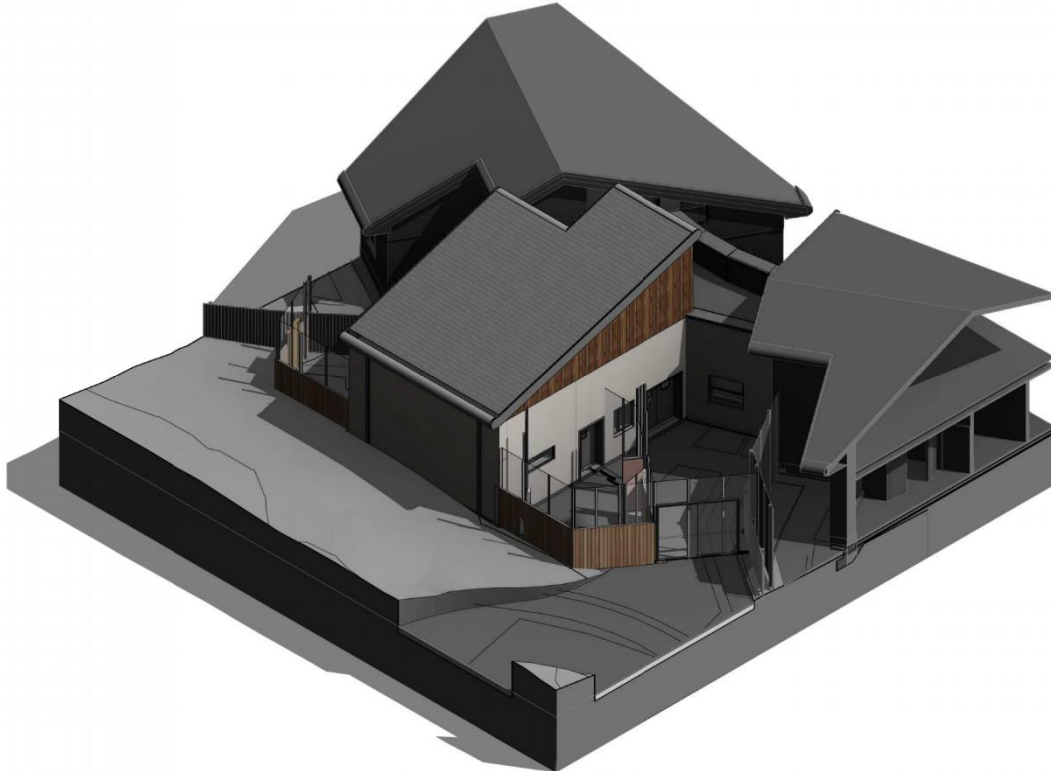


Illustration showing a 3D elevation of the proposed Seclusion Unit

Physical Works

- 3.8. The proposed layout and elevations are shown on the accompanying drawings and in the Design and Access Statement.

In detail, the proposals can be summarised as:

- A 1.5 storey seclusion building. The ground floor includes the seclusion suite as well as staff facilities. On the first floor there is a plant room.
- A pitched roof mimicking the design philosophy of the existing buildings. The height of the ridge of the proposed building is the minimum necessary to secure maintenance access to the plant room servicing the seclusion unit.
- Externally, areas for secure vehicular and pedestrian access, a secure garden area for the use of the patient of the seclusion unit and a staff break-out area

are proposed. The external areas will have secure fencing.

- The construction of the new facilities will impact on an area forming part of the landscaped garden and setting of the Redwoods Centre. Compensatory planting is proposed. A landscaping scheme is proposed as part of the proposal.
- The new link building will provide secure internal access into Oak and Laurel Wards. The flat roof of the link provides service access between the existing roof spaces and the proposed new plant room.
- The extent of the proposed access and turning head are shown on Drawing Ref OWMPFT-AJP-V1-ZZ-DR-C-001500-T03.

3.9. Together the new facilities will enable the provision of improved services on-site which will benefit not only patients but also staff, significantly reducing risks.

Operations

3.10. The new facilities will allow the more efficient delivery of safe patient care on site, reducing the reliance of transfers between sites which happens at present. The provision of the secure access will also enable the admission of disturbed or disruptive patients into the facilities without passing through the main wards.

4. Planning Policy Context

Planning Framework

- 4.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that *“In dealing with such an application [i.e., an application made to a local planning authority for planning permission] the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*. In revising the definition of the ‘Development Plan’, Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that *“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the development plan unless material considerations indicate otherwise.”*
- 4.2. Accordingly, every planning application should be determined on its own merits and in accordance with the adopted development plan unless there are material considerations which indicate otherwise. Supplementary Planning Documents which have been adopted by the Council form part of the development plan. Neighbourhood Plans, when completed, also form part of the development plan, although in relation to the proposed development there is no Neighbourhood Plan.
- 4.3. The relevant development plan comprises:
- Core Strategy (CS) (2011)
 - Site Allocations and Management of Development (SAMdev) Plan (2015)
 - The emerging Shropshire Local Plan 2016 to 2038
 - Sustainable Design Part 1 Supplementary Planning Document.
- 4.4. Relevant material planning considerations may comprise:
- National Planning Policy Framework, adopted 17 February 2019
 - National Planning Practice Guidance, dynamically updated
- 4.5. Local and national policies relevant to consideration of the proposed seclusion unit are summarised below.

Core Strategy (2011)

- 4.6. Policy CS1 establishes the **strategic approach** in the plan identifying Shrewsbury as a sub-regional centre and growth point for Shropshire.
- 4.7. Policy CS2 recognises that the **development strategy** for Shrewsbury will be as a major focus within Shropshire for the provision of infrastructure and services to meet the needs of the town and its wider catchment area.
- 4.8. Policy CS6 concerns **sustainable design and development principles**. This includes requiring all development proposals, including changes to existing buildings, to achieve applicable national standards, or for water use, evidence based local

standards as reflected in the minimum criteria set out in the sustainability checklist. This will ensure that sustainable design and construction principles are incorporated within new development, and that resource and energy efficiency and renewable energy generation are adequately addressed and improved where possible. The checklist will be developed as part of a Sustainable Design SPD (see below).

4.9. Policy CS6 also seeks to ensure new development:

- responds to the challenge of climate change and,
- protects, restores, conserves and enhances the natural, built and historic environment and,
- contributes to the health and wellbeing of communities and,
- is designed to a high quality, consistent with national good practice standards, including appropriate landscaping and car parking provision and taking account of site characteristics such as land stability and ground contamination.

4.10. Policy CS7 deals with **communications and transport** seeking a sustainable pattern of development.

4.11. Policy CS8 covers **facilities, services and infrastructure provision** seeking to enhance the quality of life by:

- Protecting and enhancing existing facilities, services and amenities that contribute to the quality of life of residents and visitors,
- Facilitating the timely provision of additional facilities, services and infrastructure to meet identified needs whether arising from new developments or existing community need, in locations that are appropriate and accessible,
- Positively encouraging infrastructure, where this has no significant adverse impact on recognised environmental assets, that mitigates and adapts to climate change.

4.12. Policy CS18 concerns **sustainable water management** requiring new development to integrate sustainable water management to reduce flood risk. All developments will be supported by either a surface water management statement or plan depending on the scale of development. They should also provide appropriate sustainable drainage systems (SUDS) as well as incorporate water efficiency measures.

Site Allocations and Management of Development (SAMdev) Plan (2015)

4.13. Policy MD2: **Sustainable Design** emphasises the importance that development proposals should amongst other things to respond positively to and respect locally distinctive or valued character and amenity value by responding appropriately to: the form and layout of existing development including heights, lines, and scale; reflecting locally characteristic architectural design and detail including materials, and form taking account of scale and proportion; protecting the historic context and enhancing

and incorporating natural assets. The policy also emphasises the importance of sustainable drainage solutions and the need to consider landscaping and open space holistically. It also requires demonstration of good standards of sustainable design and construction as required by Core Strategy Policy CS6 and the Sustainable Design SPD.

- 4.14. Policy MD12 covers the **Natural Environment** including effects of development on priority species and habitats, trees, hedges, ecological networks and visual amenity indicating that development will only be permitted if it can be clearly demonstrated there is no satisfactory alternative means of avoiding the impacts or that the socio-economic benefits outweigh the harm or as a last resort provide adequate compensation.
- 4.15. Policy MD13 deals with the **historic environment**. However, these are matters that do not directly relate to the proposed development.
- 4.16. Policy S16 applies to the Shrewsbury area. This refers to appropriate development in line with the broad development strategy, in particular Core Strategy Policy CS2 including the town's primary focus for development as a sub-regional centre and growth point. There are no further detailed policies of proposals for the site of the Redwoods Centre.

The emerging Shropshire Local Plan 2016 to 2038

- 4.17. The Regulation 19: pre-submission draft of the Shropshire Local Plan was published for consultation in December 2020. Due to Covid-19 restrictions the consultation period was extended until Friday 26 February 2021. It is intended that the new local plan will replace the CS and SEMdev, except for SAMdev site allocations that will be saved. However, the review is at an early stage which means it currently carries only limited weight. Notwithstanding this, the following policies in the local plan are highlighted as being particularly relevant to the proposed development and these policies continue to take forward the main intent of existing adopted policy.
- 4.18. Policy SP1 which sets out '**The Shropshire Test**', an overarching test to be considered within development proposals. The test includes a range of matters but includes support for health, well-being and safety of communities, mitigation of the impacts of climate change, making efficient use of land; providing sufficient infrastructure, services, facilities, and where necessary provides opportunities for their enhancement.
- 4.19. Policy SP4 concerns **Sustainable Development** confirming the NPPF presumption in favour of sustainable development and affirming the Council's commitment to work positively with applicants to approve proposals wherever possible and, approve policy compliant proposals without delay unless, adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, taken as a whole.
- 4.20. Policy SP5 requires **High-Quality Design** of new development to deliver high quality design to better, amongst other aspects, places where people live and work and sustainability. With these principles being considered proportionately relative to the scale of and type of development but, including the health and well-being of neighbours and the other nearby residential, occupiers, business and visitors to ensure the creation of better places; for those who live, work or visit and the way it functions.

- 4.21. Policy DP30 deals with **Health and Wellbeing** affirming that new development should ensure the health and well-being of individuals, communities, and places, through the retention, maintenance and improvement of community/health facilities/services and accessibility, with particular emphasis on Shrewsbury as a growth area.

Sustainable Design Part 1 Supplementary Planning Document

- 4.22. This document was adopted in 2011. The SPD supports Core Strategy Policy CS6 in providing more detailed guidance on how new development should be designed and constructed. Through the use of a Sustainability Checklist, it requires that all development proposals should meet a minimum standard in relation to a range of sustainable design principles. All applicants are required to submit a completed checklist.
- 4.23. The SPD indicates that Sustainability Checklist is a 'living' document which will be reviewed and updated in accordance with changing national guidance and local evidence. However, there are no updates to the checklist on the Council's website since the SPD was adopted.
- 4.24. Key topics covered in the SPD include water conservation and efficiency, foul drainage and management of flood risk, energy efficiency and generation and waste management including the waste hierarchy.

National Planning Policy Framework (NPPF)

- 4.25. The NPPF was published in July 2021 and sets out the Government's planning policies and how they are expected to be applied. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, defined by three overarching objectives, summarised as:
- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity, and the provision of infrastructure.
 - a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment with accessible services and open spaces reflecting current and future needs and support communities' health, social and cultural well-being.
 - an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping improve biodiversity, using natural resources prudently, minimising waste and pollution, mitigating and adapting to climate change.
- 4.26. These overarching objectives are interdependent and need to be pursued in mutually supportive ways.
- 4.27. In the determination of planning applications, LPAs are guided to apply a presumption in favour of sustainable development, which means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (paragraph 11).”

Relevant Notes:

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change

⁸ 8 This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

- 4.28. The NPPF (paragraph 38) states that decision-makers at every level should seek to approve applications for sustainable development where possible, and furthermore (paragraph 47) adds that decisions on planning applications should be made as quickly as possible and within statutory timescales unless a longer period has been agreed by the applicant in writing.
- 4.29. Chapter 8 **Promoting Healthy and Safe Communities** – seeks to achieve healthy, inclusive and safe places that meet the objectives of:
- a) promoting social interaction;
 - b) are safe and accessible; and
 - c) enable and support healthy lifestyles.
- 4.30. More specifically, the NPPF (paragraph 93) seeks to “...b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community ...”.
- 4.31. Chapter 12 **Achieving Well-Designed Places** – seeks to ensure the creation of high-quality buildings and places, noted as a key aspect of sustainable development and encourages effective engagement with between applicants, communities and local authorities (paragraph 126). The NPPF (paragraph 130) directs LPAs to ensure

that developments (inter-alia):

- (a) Function well and add to the overall quality of the area;
- (b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- (c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting.
- (d) Establish or maintain a strong sense of place using the arrangement of spaces, building types and materials;
- (e) Create places that are safe, inclusive and accessible and which promote health and well-being including through designing out crime and the fear of crime and ensuring that community cohesion and resilience is not undermined.

- 4.32. Chapter 14 **Meeting the Challenge of Climate Change, Flooding and Coastal Change** – seeks to address a range of issues through taking a proactive approach, avoiding increased vulnerability to the range of impacts arising from climate change and helping to reduce greenhouse gas emissions such as through location, orientation and design and reflecting the Government’s policy for national technical standards for building sustainability (paragraph 154).
- 4.33. New development should ensure that flood risk is not increased elsewhere and where necessary, applications should be accompanied by a site-specific flood risk assessment (e.g. on sites within Flood Zones 2 & 3, or in Flood Zone 1 where greater than 1 hectare, or involving land identified as a critical drainage area, or land identified in a strategic flood risk assessment as at increased risk in the future, or land subject to other sources of flooding where development would introduce a more vulnerable use) (paragraph 167 including footnote 55).
- 4.34. Development in areas of flood risk should only be allowed where it can be demonstrated that (inter-alia):
- (a) within the site, the most vulnerable development is located at the lowest risk unless there are overriding reasons;
 - (b) the development is appropriately flood resistant and resilient;
 - (c) it incorporates sustainable drainage systems unless clear evidence this would be inappropriate.
- 4.35. Chapter 15 **Conserving and Enhancing the Natural Environment** – seeks to address a range of aspects including (inter-alia):
- (a) protecting and enhancing valued landscapes, site of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan;
 - (b) minimising the impacts on and providing net gains for biodiversity;
 - (c) preventing new and existing development from contributing to, or being put at unacceptable risk from pollution of all types or land instability.
- 4.36. Protection is afforded commensurate with the hierarchy of designation and in respect of non-designated habitats and biodiversity the NPPF seeks the application of the following principles (inter-alia):
- (a) if significant harm to biodiversity cannot be avoided, it should be adequately mitigated or at a last resort compensated for or otherwise refused;

(b) that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy.

- 4.37. Chapter 15 also seeks to address potential sources of pollution, including (as summarised):
- Noise – to mitigate and reduce to a minimum the potential adverse effects resulting from new development and avoid noise giving rise to significant adverse impacts on health and quality of life (paragraph 185).
 - Light – to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (paragraph 185).
 - Air Quality – seeks to contribute towards compliance with relevant limit values taking into account presence of Air Quality Management Areas (AQMA) and Clean Air Zones (CAZ) and cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified through traffic and travel management. Decisions should ensure that any new development in AQMA and CAZs is consistent with the local air quality action plan (paragraph 186).

National Planning Practice Guidance

- 4.38. The National Planning Practice Guidance (NPPG) was first published in March 2014 and is dynamically updated on a paragraph-by-paragraph basis. The NPPG provides additional guidance and interpretation to the policies of the NPPF and is therefore not replicated here.

5. Planning Appraisal

Main Issues

- 5.1. This chapter addresses the planning considerations that may be considered material to the determination of the planning application, set in the context of the statutory development plan and other material planning considerations as outlined in Chapter 4.
- 5.2. The main issues relating to the proposed seclusion suite are:
- The principle of the development and,
 - The likely effects on the character and appearance of the area including design and landscaping matters and,
 - The likely effects on living conditions of both residents and neighbouring uses and,
 - Access and parking and,
 - Other matters including the effects on nature conservation and biodiversity, Land contamination, flood risk, heritage implications and waste.

Each of these matters is considered in turn below. This is followed by a conclusion regarding the overall sustainability of the proposal.

The Principle of development

- 5.3. The Redwoods Centre provides essential high-level specialist mental health services for the sub-region. While the proposed seclusion unit amounts to a small physical extension of the Redwoods Centre it will significantly add to the level of patient care and safety of both patients and staff. The seclusion unit would not only provide the best possible facilities for patients in greatest need but also help prevent higher levels of disturbance affecting the other residents within Oak, Laurel and Birch Wards.
- 5.4. The proposed location of the facility between the two existing wards is the only practicable solution and, the siting of the new unit slightly closer to Oak Ward is unavoidable because of the location of existing utilities. The secure vehicular access will also enable easier admissions into the Wards although it is anticipated this would only be necessary on an infrequent basis. Nevertheless, on those occasions it will be used this will provide very significant benefits in both patient care and safety for staff and other residents.
- 5.5. Overall, the proposed development will offer significant health and safety benefits for patients, residents of Oak, Laurel and Birch Wards and for staff working in what, at times can be a very demanding environment. As such the principle of the development is consistent with the Core Strategy (2011) (CS) which identifies Shrewsbury as a sub-regional centre and Policy CS2 identifying Shrewsbury as the focus for infrastructure provision and services to meet the needs of the town and its wider catchment.
- 5.6. The proposal is also entirely consistent with CS Policy CS8 by enhancing the existing

facilities and range of services at the Redwoods Centre.

- 5.7. Policy CS6 emphasises the importance of sustainable design and development principles for new development. These matters have been fully taken into account in developing the scheme and, further reference to this is made below.
- 5.8. While carrying limited weight, the proposals are also consistent with the emerging thinking in the Shropshire Local Plan 2016 to 2038 (LP) including the Shropshire Test in Policy SP1 in particular by helping support the health, well-being and safety of communities and also Policy DP30 which specifically covers health and well-being.

Character and appearance

- 5.9. The siting, design and layout of the proposed development has been carried out in such a way to minimise any adverse effects on the character and appearance of the area while at the same time ensuring that the necessary standards for this specialist type of development will be met.
- 5.10. In terms of the seclusion unit itself the building represents a small extension linked to the rear of the existing Oak and Laurel Wards. Its slightly off-centre positioning is required because of the need to protect existing utility provision. The materials to be used in construction are specified in the Design and Access Statement and, in particular, will mimic those used on the existing buildings. Provision for a new plant room is made in the roof space below the pitched roof. This has been designed so that the height of the new roof will be the minimum necessary to secure maintenance access to plant serving the seclusion unit.
- 5.11. Secure fencing is required but to minimise its impact this has been specified to match the existing secure fencing to the garden areas of the existing wards.
- 5.12. The seclusion unit is limited to the existing flat area to the rear of the existing buildings. The existing footpath will remain in its current position, but this will be crossed by the new access. The provision of the new access requires a cut to be made through the existing mound which separates the footpath with the perimeter road. It is acknowledged that this will have some limited impact on the existing landscaping which will be made good after the new access has been provided. A soft landscaping scheme prepared by Danielle Jeynes Landscape Design and Ecology Services accompanies this planning application.
- 5.13. The closest dwelling to the new building would be approximately 45m away in Wellwood Close. There is a single window at first-floor level that would directly face the proposed development. The new building will be visible but, given that Wellwood Close is lower than the level of the proposed building and the intervening distance views will be softened by the existing, intervening soft landscaping which will remain largely untouched by the proposals.
- 5.14. Views of the new development from Racecourse Lane are severely restricted by the existing, dense hedgerow. This exceeds the height of pedestrians so the visual effects of the new building on views would be negligible and the subservience of the new building to the existing wards and the use of sympathetic materials would further reduce any impacts. The new building would be visible from the first-floor windows of the dwellings on the Racecourse Lane frontage but at a distance of in excess of 50 m the effects would again be negligible.

- 5.15. Taking all the above matters into account, the proposed development would have a negligible impact on the character of the area and views into the site. Soft landscaping will further reduce any residual effects. Accordingly, the negligible effects on character and appearance would be significantly counter balanced by the significant benefits to health and well-being that the scheme will bring. The proposal is therefore consistent with the provisions of the CS and, in particular, with the aspirations set out in Policy CS6 which seeks a high quality of design in new development including its relationship to existing development and the health and well-being of the community.
- 5.16. The proposal is also consistent with Policies MD2 of the Site Allocations and Management of Development (SAMdev) Plan (2015). Policy MD2 requires the design of new development to respond positively to and respect locally distinctive or valued character and amenity value. These principles continue to apply through Policy SP5 of the emerging local plan review.

Living conditions

- 5.17. The application proposals will have significant beneficial effects for the living conditions of residents of Oak, Laurel and Birch Wards. This is because the seclusion unit enables individuals with particular needs to be taken away from the ward. This will help maintain a calmer and safer environment for all patients and staff. Similarly, the secluded patient will benefit from being placed in a safe environment during the period of difficulty. The separate garden area to seclusion unit also means that the patient can benefit while using the seclusion unit whereas at present, that would not be possible with other patients present. It also means that a patient in those particular personal circumstances would not need to be transferred elsewhere with all the additional trauma and risk this might generate.
- 5.18. Accordingly, the proposal is therefore consistent with the provisions of the CS and, in particular, with the aspirations set out in Policy CS6 which seeks a high quality of design in new development including its relationship to existing development and the health and well-being of the community. The proposal is also consistent with Policies MD2 of the Site Allocations and Management of Development (SAMdev) Plan (2015). Policy MD2 requires the design of new development to respond positively to and respect locally distinctive or valued character and amenity value. These principles continue to apply through Policy SP5 of the emerging local plan review.

Access and parking

- 5.19. The provision of the seclusion unit will not lead to an increase in the number of beds accommodating patients at the Redwood Centre. The intention is that any occupant would be returned to the main ward following any period of trauma. Thereby, the proposals would not lead to an increase in the requirement for car parking. It is acknowledged that there is an existing shortfall of car parking spaces at the Redwood Centre, but this is being addressed through another planning application (Ref. No: 21/02624/FUL).
- 5.20. The secure drop-off will feature a turning head so that vehicles are able to enter and leave the perimeter road in forward gear. The secure access to the unit will be used only lightly and will not lead to a discernible increase in vehicle trips. The parking of vehicles other than to use the secure access area will not be permitted.

- 5.21. The proposed development is therefore consistent with all relevant local policies including CS Policy CS6 to the extent possible for this type of development. The need for secure access means that the use of alternative modes of transport would not be possible.

Other matters

- 5.22. In relation to **nature conservation and biodiversity** an Ecological Appraisal Report has recently been carried out by Cotswold Wildlife Surveys as part of the planning application for the proposed new car park at the Redwoods Centre. This report addressed to likely presence of Greater Crested Newts on the Redwoods site. The summary of findings indicates the following:

“Although the locations for the car parking extensions could be used by foraging or commuting Great Crested Newts, if they are present in the nearby pond, there are no obvious refugia or hibernacula. With no places of shelter, it is considered highly unlikely that Great Crested Newts will be encountered. Nevertheless, to ensure that amphibians are not harmed by the proposed works, a Precautionary Method of Working is provided.”

- 5.23. Given that the pond is approximately 100m away from the proposed new access and beyond both Evolution Road as well as the internal perimeter road and proposed new car parking, the risk to the application site is considered to be very low. If the Council have any residual concerns in this respect, then a Precautionary Method of Working could be required through a planning condition in mitigation.
- 5.24. A copy of the Cotswold Wildlife Survey report can be provided if necessary. There are no other specific known concerns with regard to nature conservation and biodiversity.
- 5.25. When the Redwoods Centre was initially proposed it was known that the site had been subject to **contamination** from diseased cattle. It is understood that the contamination was removed as part of the development.
- 5.26. A copy of the original contamination report prepared by Clarke Bond in 2010 (Preferred Option 8 Phase 2b Geo-Environmental Site Assessment) for the construction of the Redwoods Centre has been submitted with this planning application. In addition, a further Phase I Desk Study and Appraisal Review prepared by GRM relating to proposed Seclusion Unit has been prepared. This concludes that, “This Phase I Site Appraisal has shown the site is suitable for the proposed development, assuming compliance with all the recommendations contained within this report”.
- 5.27. Accordingly, no further survey work or technical study is required prior to submission of the planning application. Should the Council have residual concerns then these could be covered by an appropriately worded planning condition.
- 5.28. With regard to **flood risk** the site the application site falls within Zone 1. Notwithstanding this, foul and surface water drainage are important considerations from a sustainable development perspective and clarity (see below) is provided that the scheme deals with these aspects in accordance with the minimum standards set by the Council.
- 5.29. In relation to **surface water drainage** the Building Regulations - Approved Document

H (2002) details a hierarchy of potential methods for disposing of surface water as shown below in order of preference:

- Discharge via infiltration
- Discharge to watercourse
- Discharge to sewer.

- 5.30. Considering the hierarchy above, the surface water network for the proposed site should infiltrate where possible. An intrusive site investigation has been completed and the impermeable ground conditions of clay and silt strata preclude the use of infiltration (soakaways) as a method of disposal.
- 5.31. Discharge to the nearest watercourse is impractical due to distance and requirement to cross third party land on route.
- 5.32. The proposed sustainable strategy is to restrict the surface water discharge rate to that as close to the existing greenfield run off rate as practical before discharging into the private hospital drainage surface water network which ultimately discharges to the public sewer system. Given the small-scale nature of the development, with the calculated greenfield run off rate being impractically low, a minimum practical restricted rate of 3.5 l/s has been adopted (generally accepted as a practical minimum before orifice sizes required to restrict flows further become prone to blockage).
- 5.33. This restriction applies to the 1 in 2 year, 1 in 30 year and 1 in 100 year + 40% climate change allowance. Flows are restricted via a flow control device manhole and attenuated via storage in oversized pipes and manholes.
- 5.34. The strategy follows the principles adopted across the existing overall Redwoods Centre site (where restricted discharge and cellular storage are employed) and is an accepted form of sustainable drainage.
- 5.35. In respect of **waste** during construction, it is anticipated that this will be covered as part of a Construction Management Plan, and this will ensure that any waste is effectively dealt with in a sustainable manner. Waste following completion of the development will be fed through existing, sustainable waste management systems operational within the Redwoods Centre. A Waste Audit Statement has been completed as part of the planning application.
- 5.36. In respect of the **heritage implications** of the proposed development it is understood that the site does not fall within, and is not within the setting of, either a Conservation Area or Listed Building, so no further analysis of the effects from this perspective is required.
- 5.37. In respect of the other matters, no serious matters of concern have been raised that cannot be dealt with by way of suitable planning conditions. However, it is also recognised there are implications for sustainable development that the planning application needs to detail, in order to demonstrate that maximum effort has been made to ensure that the proposed development is consistent with the principles of sustainable development. To this end and, as required by the Council's Sustainable Design Part 1 Supplementary Planning Document, the Sustainability Checklist has been completed and accompanies this planning application.

Conclusion

- 5.38. This planning appraisal has demonstrated that the proposed development accords with the relevant policies of the Development Plan and other material considerations when considered as a whole. Accordingly, the NPPF (paragraph 11), Core Strategy (2011) and the Site Allocations and Management of Development (SAMdev) Plan (2015) place a 'presumption in favour of sustainable development' and, accordingly, should be approved without delay.

6. Planning Obligations

Community Infrastructure Levy (CIL)

- 6.1. It is understood that the proposed development would be nil rated for CIL.

Section 106 Obligations / Head of Terms

- 6.2. The small scale of the proposed development and absence of any requirement for off-site works means that a S106 agreement would not be required for the proposed development.

7. Summary and Conclusion

- 7.1. This Planning Support Statement (PSS) has been prepared on behalf of the Midlands Partnership NHS Trust to inform preparation of an application for full planning permission for a new seclusion block and associated external works (the proposed development) at Oak Ward, Redwoods Centre, Somerby Drive, Bicton Heath, Shrewsbury SY3 8DS.
- 7.2. The PSS acts as a signpost to the array of documentation that comprises the planning application, including the forms and all the supporting information to ensure that the relevant requirements of the local validation checklist are met. Since the proposal is small scale some of the information required by the checklist has been set out in this planning statement rather than being set out in separate documentation.
- 7.3. The urgent and compelling need for the new seclusion unit is set out in section 3. This will lead to an important upgrade to the quality of service to be made available at the Redwoods Centre offering a significant improvement to the welfare of patients and staff. The extent of the new building and works required are small in comparison to the Redwoods Centre site and the proposals are sited in the only practicable position.
- 7.4. The summary of relevant planning policies in section 4 leads to the planning appraisal in section 5. This demonstrates that the development overall is highly compliant with policies operating both locally and nationally and reflecting the efforts that have been made to ensure the new development can be accommodated with negligible, if any adverse impact on the character of the area. No significant adverse effects have been identified and any residual concerns - such as land contamination - can be covered through appropriate planning conditions. The application includes a completed sustainability checklist which confirms that the proposed development is consistent with sustainable development principles in all respects where it is practicable to do so.
- 7.5. In accordance with the NPPF (paragraph 11), Core Strategy (2011) and the Site Allocations and Management of Development (SAMdev) Plan (2015) which all place a 'presumption in favour of sustainable development' the planning application should be approved without delay. Subject to planning permission being granted it is the NHS Trust's intention to commence works on-site on in the very near future so that urgent need for the upgraded facility can become operational at the earliest possible date.