



# UNION 4 PLANNING

**Client:** **FACEmed**

Site address: Facemed Cosmetic Medical &  
Dental Centre, London Road,  
Crays Hill, CM11 2XP

## **PLANNING, DESIGN AND ACCESS STATEMENT**

**November 2023**



**UNION4**  
**PLANNING**

## Document Control

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## **Contents**

<b>1.0</b>	<b>Introduction .....</b>	<b>2</b>
<b>2.0</b>	<b>Medical and Dental Centre Application Site &amp; Planning History .....</b>	<b>5</b>
<b>3.0</b>	<b>The Proposed Development .....</b>	<b>7</b>
<b>4.0</b>	<b>Planning Policy .....</b>	<b>8</b>
<b>5.0</b>	<b>Design &amp; Access Statement.....</b>	<b>11</b>
<b>6.0</b>	<b>Planning Appraisal .....</b>	<b>13</b>
<b>7.0</b>	<b>Conclusion .....</b>	<b>20</b>

## 1.0 Introduction

- 1.1 This Planning, Design and Access Statement (PDAS) is submitted in support of a planning application for a proposed single storey infill extension, car park alterations, access works and landscaping at the FACEmed Cosmetic Medical and Dental Centre, Crays Hill.
- 1.2 The proposed development has been designed to provide an easily deliverable solution to the urgent requirement of the Centre to address current issues relating to the patient experience and ease of access to existing plant for maintenance purposes. There is a different scheme currently with the Council and waiting to be determined.
- 1.3 The application proposes an infill extension between the existing Medical and Dental Centre and the existing storage building within the curtilage of FACEmed, along with re-organisation of the car park and closure of the separate access from Oak Avenue.
- 1.4 The application is accompanied by the following documents:
- Architect drawings by Munday + Cramer,
  - Tree Survey and Arboricultural Impact Assessment by Underhill Tree Consultancy,
  - This Planning, Design and Access Statement by Union 4 Planning,
  - Topographic Survey by SurvaTec Ltd,
  - Supporting Letter from FACEmed the applicant, and
  - NHS support email.
- 1.5 As the application does not meet the criteria for a major planning application the above documents are considered to provide the appropriate level of information for a development of this size.

### **Background**

- 1.6 FACEmed Cosmetic Medical and Dental Centre is a purpose-built CQC regulated Independent Hospital located in Crays Hill, Billericay. FACEmed opened in March 2017 with the main aim of offering the local community a much-needed multi-speciality dental, medical and surgical facility all under one roof. The FACEmed building consists of two levels with two entries, front and rear, for patients. The Medical and Dental Centre is wheelchair accessible on the ground floor through the front entrance.
- 1.7 The Centre offers a spectrum of medical services that promotes optimal health and wellness unrivalled within a 15-mile radius of Crays Hill, Billericay.
- 1.8 Currently the Centre proudly serves over 2,000 patients both NHS and private.
- 1.9 Surgical patients are operated on weekly for foot and ankle surgery such as bunions, hammer toes, Morton's neuroma and more. The teams consist of NHS Consultant Podiatric Surgeons Jason

Nandlal and Suzanne Taylor who train onsite the next generation of Essex Podiatric Surgeons - Specialist Registrars David Goyette and Richard Lang.

- 1.10 In 2022 the Centre introduced hand surgery with Professor Ben Miranda, another Essex NHS Consultant Surgeon currently treating patients for trigger finger, ganglions, carpal tunnel syndrome and other hand anomalies such as arthritis (steroid injections) and benign and malignant cancerous lesions.
- 1.11 The longer standing services of FACEmed include day stay plastic surgery performed by Consultant Plastic Surgeons who are GMC Specialist Registered in head and neck reconstructive surgery including facial reanimation and microsurgery.
- 1.12 The management of benign and malignant cancer lesions at FACEmed is aided by the service level agreements in place with specialist laboratories in Essex such as Chelmsford Histopathology (based at Broomfield NHS) and Pathology First in Basildon. Specialist courier services collect samples and take them to the specialist laboratories for pathological diagnosis which is then relayed to the patient at FACEmed by their Consultant Surgeon.
- 1.13 In addition to NHS and privately funded healthcare, the Centre is registered as a provider of surgery for hand, foot, ankle and skin surgery with major private health insurers such as BUPA and AXA PPP.
- 1.14 The dental department at FACEmed currently offers a full spectrum of dental services including some maxillofacial oral surgical procedures. Oral cancer screening is an integral part of the patient examination within the dental department and onsite X-Ray and CT imaging is also available. The state-of-the-art onsite Cone Beam CT scanner allows patients to have in-depth imaging on the same day as opposed to being referred to a specialist imaging Centre. The Centre offers a health insured essentials package for adults and children via Simply Health Denplan allowing patients to sign up for their continuous dental health checks and hygiene throughout the year.
- 1.15 FACEmed is home to the only 24/7 emergency dentist in Essex. The service level agreement acquired by FACEmed with 247 Dental Limited grants FACEmed with exclusivity on this particular service throughout Essex. Patients are provided with a dedicated number which allows them to book emergency dental appointments 24/7 including weekends and bank holidays.
- 1.16 To manage and maintain stringent infection prevention and control protocols and procedures in line with government guidelines for current activity levels in all departments, the Centre requires clinically hygienic access to its store of medicines, equipment, instruments and PPE. There is insufficient storage space within the existing Centre. In November 2022, planning permission was granted for the use of existing buildings to the rear of the Centre to be used as commercial storage (application ref. 22/01292/FULL). The largest of these, nearest the existing Centre is used to store

- medicines, clinical equipment, instruments and PPE. This building can only be accessed externally, which creates issues for maintaining clinical levels of hygiene.
- 1.17 In addition to this, to safely continue to deliver current service offerings and facilitate efficient, effective and dignified care giving the Medical Centre is required to be able to promote inclusivity and accessibility for disabled and elderly patients to both front and back entry.
- 1.18 The independent Medical Advisory Committee of FACEmed has indicated that with more space the service can safely continue to cater for current patient numbers by solving internal logistical and spatial shortcomings. As a result, FACEmed acquired land to enable the following benefits to be provided (facilitated by the proposed rear infill extension):
- a) Additional reception area for surgical patients with wheelchair friendly space (comfortable distancing from other patients) to avoid using current multi-departmental waiting areas.
  - b) The proposal positions this entrance so that it is accessible and legible to patients from the car park.
  - c) Ease of access to the existing store for surgical/ dental equipment, instruments, PPE, stock and cleaning/ maintenance supplies.
- 1.19 The application is accompanied by supporting correspondence from Jason Nandlal of the Essex Partnership University NHS Foundation Trust dated 31<sup>st</sup> January 2023. This explains the current situation at the Clinic and how this application benefits patients care. It also sets out the improvements required to facilitate the levels of care that have been agreed between FACEmed and the NHS trust. The Trust fully support the planning application which is a material consideration in favour of granting permission.
- 1.20 The existing access to the Centre via the rear door will continue; this access has been used since the opening in 2017 with no complaints.
- 1.21 Given similarities between the proposed development in this application and that of application ref. 23/00353/FULL, the concerns raised with that application are also addressed in this scheme.

## 2.0 Medical and Dental Centre Application Site & Planning History

- 2.1 The application site is situated within the urban area of Crays Hill on the corner of Oak Avenue and the A129.
- 2.2 It is largely a residential area, with a parade of shops opposite the site.
- 2.3 The eastern and southern boundaries are shared with dwellinghouses. There is currently an access running along the southern boundary of FACEmed with a long boundary wall and its own crossover point onto Oak Avenue.
- 2.4 An extensive car park separates the medical facility from the western and part northern road boundaries.
- 2.5 The Medical and Dental Centre was originally approved in 2015 under application reference 15/00057/FULL. Since then, minor amendments were made to the scheme, both of which were approved.

### **Planning History**

- 2.6 The most relevant planning applications include:
- 1) Application ref. 15/00057/FULL – application for a cosmetic centre with associated car parking.
  - 2) Application ref. 15/00755/FULL – minor amendments to approved planning permission 15/00057/FULL
  - 3) Application ref. 16/01339/NMABAS - amendments to boundary treatments and gates
  - 4) Proposed single storey rear extension (23/00353/FULL) – to provide new surgical entrance, reception and waiting area, store rooms, WCs and other associated facilities. Alteration of the car parking layout.
  - 5) FACEmed Cosmetic Medical and Dental Centre (application ref. 22/01292/FULL) – permission granted in November 2022 for the change of use of land that now forms part of the application site.
  - 6) FACEmed Cosmetic Medical and Dental Centre (application ref. 23/00353/FULL) – single storey rear extension to provide new surgical entrance, reception and waiting area, store rooms, WC's and other associated facilities. Alter car parking layout. Awaiting decision.
- 2.7 Of most relevance is application ref. 22/01292/FULL. This application was granted in late 2022 for a change of use from residential to commercial use of the land and buildings to the rear of the

existing Centre. A Condition of the approval is for the buildings to be used in conjunction with the existing Medical and Dental Centre.

- 2.8 These buildings are used in conjunction with the existing Centre, however, to use these buildings efficiently and effectively, especially the main store, staff members (which are medical professionals on duty, looking after sick patients), need safe access where appropriate infection control is respected at all times for the purpose of the activity of the Medical and Dental Centre.
- 2.9 An application at White Lodge on Crays Hill (approx. 120m to the east of the Medical and Dental Centre), was granted planning permission in 2019 for a large single storey rear extension (application ref. 19/00137/FULL). The scale of the rear extension approved at White Lodge is similar to that proposed in application ref. 23/00353/FULL. It is also in very close to proximity to the plot boundary.



### 3.0 The Proposed Development

- 3.1 The Proposed Development comprises a single storey infill extension (between the main building at FACEmed and the existing storage building), car park alterations, access works and landscaping. Two small outbuildings between the main building and the storage building are proposed to be demolished.
- 3.2 The proposed new built form comprises an infill extension with a low level pitched roof. It will build off the existing narrow plant room, expanding it and creating a separate small 'Dirty Instruments Room', with a linking corridor to the south connecting to a surgical admission and discharge reception area, with full disabled access via a set of double entry doors.
- 3.3 The total new floor area of this extension measures 88sqm.
- 3.4 The extension will be over existing hardstanding.
- 3.5 Its creation will provide an additional patient admission and discharge area, with wheelchair friendly space (comfortable distancing from other patients) and clinically standard hygienic access to storage for surgical/ dental equipment, instruments, PPE, stock and cleaning/ maintenance supplies.
- 3.6 It is also proposed to re-order the car park and reduce the number of access points from two to one, removing one of the crossovers.
- 3.7 New landscaping will also be provided as part of the comprehensive high quality approach taken by the owners to all their developments.

## 4.0 Planning Policy

- 4.1 Applications for planning permission must be determined in accordance with the Development Plan, including the National Planning Policy Framework (NPPF 2023) unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchaser Act).
- 4.2 The Development Plan for the site comprises:
- The Policies and Guidance of the National Planning Policy Framework (the NPPF) and associated National Planning Practice Guidance (PPG),
  - Basildon District Local Plan Saved Policies (2007).

### **The NPPF and the NPPG**

- 4.3 The NPPF provides the national planning policy guidance. The current version was released in September 2023. This is supported by online National Planning Policy Guidance (NPPG).
- 4.4 The updated National Planning Policy Framework maintains a presumption in favour of sustainable development. This means approving proposals which accord with the Development Plan without delay.
- 4.5 Where a Plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of specific policies of the Framework which indicate development should otherwise be restricted.
- 4.6 Chapter 2 — Achieving Sustainable Development — includes the economic, social and environmental objectives and a presumption in favour of sustainable development. In this case, the proposed development supports the achievement of sustainable development through its very positive contribution to supporting communities health and well-being (the social objective of sustainable development). This is a key Government objective, which as a relevant material consideration should be given significant weight in assessing this application.
- 4.7 Chapter 5 – Building a Strong Competitive Economy – “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”
- 4.8 Chapter 7 – Ensuring the Vitality of Town Centres – Planning policies and decisions should take a positive approach to the growth of town centres, their management and adaptation.
- 4.9 Chapter 9 – Promoting sustainable transport - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 4.10 Chapter 11 — Making effective use of land — " Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses,..." (119) and "promote and support the development of under-utilised land and buildings.." (120(d)).
- 4.11 Chapter 12 — Achieving well-designed places — seeks new buildings and altered buildings to be of a high-quality design.
- 4.12 The proposal is supported by the above strong direction of the NPPF, as explained in more detail below, which should carry significant weight.

#### **Local Planning Policy**

- 4.13 There is no up-to-date Development Plan in place in the Basildon Council area and therefore no relevant policies, so permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits.
- 4.14 The advice within the NPPF takes precedence in this case. Paragraph 81 states that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed upon the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development."
- 4.15 The above supports the aspirations of FACEmed which is looking to meet the essential health and safety needs arising from its successful operation in a sustainable location. The NPPF supports the proposal for the economic benefits it would bring to the area.
- 4.16 The NPPF notes under paragraph 11 that plans and decisions should apply the presumption in favour of sustainable development "where there are no relevant development plan policies...granting permission..."
- 4.17 The only possible impacts that could be associated with a single storey extension would relate to the amenity of the neighbouring developments. Again as will be set out below, there are no adverse impacts significant or otherwise that are anticipated to arise from this proposal.
- 4.18 Basildon is collaborating with other Councils in South Essex through the Association of South Essex Local Authorities (ASELA) to prepare 'South Essex 2050.' The core purpose of ASELA is to 'provide place leadership for South Essex and deliver a vision for South Essex up to 2050, promoting healthy growth for our communities.' ASELA's work helps the Council meet the requirements of the Localism Act 2011 and making a case for the infrastructure required to support 'expanding and new communities across the region, whilst maximising job opportunities within a growing economy.' The collaboration with the Councils and businesses aims to develop a long-term growth ambition. This application (albeit for a very minor quantity of additional floorspace), would have a positive benefit on the ability of the Centre to provide medical and dental services to the South Essex region. The proposed development should be viewed in light of the wider infrastructure

needs of the region, for which the Councils are lobbying central Government for support. This application goes to the heart of this collaboration by providing:

1. Capacity to meet the medical and dental needs of the area
2. Infrastructure that supports long-term growth
3. Skilled jobs

4.19 The scheme should be recognised as an integral part of the essential infrastructure required across the sub-region to support the longer-term growth ambition and as a result, it should be viewed very positively in this regard.

4.20 In addition, the Government's approach to public health challenges is set out in 'Healthy Lives, Healthy People: Our strategy for public health in England.' This contains objectives that seek to:

1. Protect the population from health threats
2. Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing
3. Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.

4.21 By providing additional space and improved accessibility to the existing facility, this proposal is fully in accordance with and aligns with these objectives.

4.22 It is therefore considered that the presumption in favour of sustainable development should be applied and permission granted "without delay".

## 5.0 Design & Access Statement

- 5.1 This is a minor planning application for a single storey infill development within the grounds of the existing Medical and Dental Centre.
- 5.2 The development does not meet the specific criteria to be required to submit a Design and Access Statement, however the applicant includes a proportionate level of information here to ensure there is clarity over the minor nature of the submission.

### Design

- 5.3 The architect has been associated with the site for a number of years and assessed the components that form its setting and character and understands the planning history of the previous submissions.
- 5.4 The proposed development is for an infill between the main Medical and Dental Centre and a building within the hardstanding area behind it within the curtilage of FACEmed.
- 5.5 The proposal matches the design standards of the original building, materials and style. Enhancing the bespoke structure. It has a pitched roof with an overhang providing an attractively glazed elevation, which also clearly demarcates the entrance.
- 5.6 The opportunity is also taken to rationalise the parking on site and close off an unnecessary crossover point, along with the introduction of new planting.

### Amount

- 5.7 The application proposes a single storey infill development between the two main buildings on the site, including a more efficient internal layout of the existing store.
- 5.8 The total new floor area proposed is 88sqm. The ridge height will match that of the existing storage building.
- 5.9 The number of parking spaces will remain the same.

### Layout

- 5.10 This is a simple infill development creating a link between the Centre's main building and existing store.
- 5.11 New planting will be provided along the southern boundary.

**Scale**

- 5.12 This is a minor development forming an ancillary infill extension to the existing Centre.
- 5.13 The extension will be screened by the main building with distance views from the road through the car park.

**Appearance**

- 5.14 The extension will reflect the architecture of its respective buildings.
- 5.15 It will utilise similar materials and proportions, fitting well within the immediate commercial environment.
- 5.16 There will be a single pitched roof. The building will be matching materials to the existing, yellow brick walls, tiled roof and grey metal windows, doors, black rainwater goods etc.

**Context**

- 5.17 The site lies within a mixed use commercial and residential area.

**Use**

- 5.18 The property will continue in its current lawful use, which is a medical centre.

**Access**

- 5.19 The main vehicle access to the site will remain as existing.
- 5.20 The secondary access and crossing point will be closed off. The parking spaces will be moved back into the newly created space with new boundary treatment and landscaping.
- 5.21 The proposed development will comply with Part M of the Building Regulations; level thresholds and solid hardsurfacing externally; inclusive access internally includes internal door widths of 838mm, switches and sockets positioned between 450mm and 1200mm above floor level and well lit accommodation and access routes.
- 5.22 Appropriate health and safety precautions (to be set out in a Traffic Management Plan) will be undertaken during construction work to ensure the free flow of traffic and highway safety is not compromised.

## 6.0 Planning Appraisal

- 6.1 The proposed infill development is designed to provide an additional fully accessible entrance, with further patient reception space, dedicated dirty instrument cleaning room and an enlarged plant room, all of which are urgently required to meet existing needs and health and safety requirements.
- 6.2 The purpose of the infill is in part to enable covered access to the storage facilities and to ensure that PPE does not have to be washed for being transferred via the outside space to the existing storage area. It also provides additional space and a further accessible patient admission and discharge reception area. This will provide a better environment for the Centre and enhanced facilities for the patients and medical practitioners.
- 6.3 As indicated above the site lies within the urban area of Crays Hill on previously developed land.
- 6.4 In order to comply with current CQC FACEmed are urgently required to address three elements:
- a) To improve patient safety and their experience of using the centre by providing an accessible and comfortable environment. This can only be achieved by providing adequate space for patients being discharged from day surgery in wheelchairs and/ or crutches to be safely transferred in a dignified manner directly to the discharge reception area and straight into arranged transport for recovery at home. The Medical and Dental Centre is required to promote inclusivity and accessibility for disabled and elderly patients to both front and back entry. The patient waiting area at the front of the building is too small and poorly positioned to manage the process of discharging day surgery patients.
  - b) Medical staff on duty require safe, clean and effective access between the clinical area and the equipment/ instruments storage area. Continuous access between the two areas is required during clinical time throughout the working day. Infection control and health and safety cannot be compromised in health care surgical settings.
  - c) The existing plant room is overcrowded with a low head height level (1.5-1.7m in places). Specialised equipment requires regular maintenance and servicing. Whilst the safety of personnel and equipment performance is continuously monitored, the lack of space restricts the efficient maintenance and servicing of equipment. Certain equipment also only operates efficiently within a particular temperature range and limited space creates difficulties with maintaining an optimum temperature.
- 6.5 Addressing the above elements will reduce the associated risks and enable the Centre to operate efficiently and effectively.

### **Principle of Development**

- 6.6 As noted above where a Plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of specific policies of the Framework which indicate development should otherwise be restricted.
- 6.7 The NPPF actively supports proposals that support communities' health and well-being, as one of the fundamental objectives of achieving sustainable development, which (at its heart), is the purpose of the planning system. This support at the national level for proposals that contribute to the social objective is a strong material consideration in support of the application.
- 6.8 As noted in the Policy Section above, Central Government is very supportive of the economic sector seeking to invest and prosper. The NPPF in paragraph 81 states, *"...Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...This is particularly important where Britain can be a global leader in driving innovation..."*
- 6.9 The site is underutilised brownfield land. Also, the gap between the buildings is hardstanding and serves no useful function in relation to the FACEmed activities on site. It acts as transition space, which creates a health and safety issue for staff accessing the store.
- 6.10 In this case the principle of a successful medical and dental centre improving its facilities to meet an identified need on a brownfield site within the built-up urban area is acceptable, subject to consideration of technical matters and any other impacts. The proposal is also supported by national policies and the collaborative approach to deliver longer term growth (through South Essex 2050), as set out above.

### **Design**

- 6.11 The proposal is for a single storey, pitched roof infill extension between existing buildings within the rear curtilage of the site.
- 6.12 The design policies including associated Supplementary Planning Documents are considered out of date. As such the NPPF provides the 'Framework' under which the decision can be made. Within the advice paragraph 130 sets out design criteria that planning decisions should be considered against. The extension and the rationalising of the site is considered against these criteria as follows:



**a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development**

- 6.13 The proposed development will be sustainably located within the existing FACEmed grounds. It is easy to understand and will reflect the high standards of the original bespoke medical facility at the front of the site. Visibility of the infill part of the site will be very limited (by existing buildings and boundary features) and the remaining visible element will be softened by new landscaping.
- 6.14 The proposal will improve the ability of the Centre to function well (which is the key aim of this scheme) and will enhance the overall quality of the area. This is achieved in a number of ways, including by:
- a) Improving ease of access,
  - b) Enhancing landscaping,
  - c) Improving the legibility and function of the building, and
  - d) Rationalising and improving vehicle access arrangements.

**b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping**

- 6.15 The design, form and layout of the existing building has been replicated with this scheme. The proposed infill extension will seamlessly and harmoniously synchronise with the earlier design. Combined with the use of high-quality materials, it will result in an aesthetically pleasing scheme that is appropriate to the site. As mentioned above, appropriate native planting will be provided around the periphery of the site, enhancing and framing the existing and proposed buildings.

**c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)**

- 6.16 As indicated the extension takes its design lead from the existing building. There is no specific character or heritage history in the immediate vicinity other than lying within the urban built up area. The scheme is therefore considered sympathetic and appropriate to this setting.

**d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit**

- 6.17 This is not considered relevant to an infill extension and rationalisation of the site under a minor planning application. However, the design and use of materials will create an attractive and welcoming building, which will work well for employees and patients. It will therefore enhance the experience of the staff and public users of the site, using the available space efficiently and effectively to meet urgent health and safety requirements.
- 6.18 Due to its location immediately to the rear of the existing Centre, the extension would be viewed in the context of the existing buildings and the trees beyond. The infill extension is the same height as the existing store, connecting the two existing buildings to provide a consistent approach that is appropriate to the site and locality.
- 6.19 These factors enable the proposal to blend into the well treed background when viewed from Crays Hill, which is the only public vantage point where the extension would be visible (and this vantage point is narrow, due to the position of the existing building and the boundary with The Firs).

**e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks**

- 6.20 Again, this is not considered relevant to a proposal of this scale, however by efficiently using the space between the existing buildings, the proposal achieves the required additional space whilst also retaining green space at the rear of the site.

**Highways**

- 6.21 The access is existing and provides suitable sightlines. The parking area will be re-arranged, providing more space for turning within the site. An existing cross-over is proposed to be removed, improving local road conditions and highway and pedestrian safety in the area.
- 6.22 The increase in built form will not have a materially negative impact on the road network, as there will be no anticipated increase in vehicle movements.
- 6.23 There will be no anticipated detriment to existing users of the highway, both vehicular and pedestrian.
- 6.24 The road is a 30mph local distributor road. Clear visibility splays are provided as shown on the site layout plan.
- 6.25 The Highway Authority has raised no concerns with the current application (ref. 23/00353/FULL) and this application is for a similar scheme in highways terms. As a result, it is anticipated this proposal would not raise any highway concerns.

- 6.26 This is a minor application and the revised NPPF states under paragraph 111 that "Development should only be prevented or refused on highway grounds if there would be an unacceptable impact upon highway safety or the residual cumulative impacts on the road network would be severe."
- 6.27 It is considered unlikely that highway safety will be impacted upon negatively or that any cumulative impacts will become so severe as to warrant an objection on highways grounds.

### **Flooding**

- 6.28 This is a minor planning application for a small infill development, which is proposed on a part of the existing site that is already covered in hardstanding.
- 6.29 The site falls within Flood Zone 1 and does not suffer from any surface water flooding issues.
- 6.30 As such the site is not at risk from flooding and a Flood Risk Assessment is not required.

### **Ecology**

- 6.31 The site comprises a very active and well-lit commercial premises.
- 6.32 The extension is over existing hardstanding and involves the removal of two small outbuildings only, which provide no potential ecological habitat. No harm is therefore identified to any ecological protected species or habitat.
- 6.33 The site is a minor planning application and qualifies as a 'small site' in the legislation under which Biodiversity Net Gain (BNG) is not mandatory until April 2024.
- 6.34 In addition Section 3.1 of the Government's 2023 consultation response sets out exemptions from mandatory BNG, which will be implemented by secondary legislation. One of these is "*development impacting habitat of an area below a 'de minimis' threshold of 25 metres squared, or 5m for linear habitats such as hedgerows and watercourses [NOTE Defra have confirmed (9 August 2023) that this is 25 square metres (5m x 5m = 25 sqm).*"
- 6.35 As indicated above the extension is over hardstanding and does not involve the loss of any ecological habitat. Therefore, the proposed development is exempt from the requirement to provide BNG.

### **Trees**

- 6.36 A revised tree report accompanies this application. This report explains that no trees on or off-site will be adversely affected by this minor infill extension. All living trees will be retained and no

impact on their root protection areas (RPA's) is anticipated. The recommendations of the tree report will be implemented to protect existing trees.

- 6.37 As this scheme retains all the living trees there would be no change to the outlook from neighbouring properties.

### **Amenity Impacts**

- 6.38 The proposed infill development is single storey with a pitched roof matching the height of the existing storage building used in association with the Medical and Dental Centre. The infill extension will also be framed by new native planting. There will be no overlooking, overshadowing or daylight/ sunlight impacts associated with the proposed extension. Nor will there be any change in perception of the same.
- 6.39 The proposal removes the existing established vehicular access to the store at the rear of the existing building. This access is used for deliveries to the Centre (via a driveway from Oak Avenue, which runs tight alongside the boundary with The Firs). This will result an improvement in highway and pedestrian safety at the corner of Oak Avenue and Crays Hill.
- 6.40 There can be up to 15-20 deliveries per day requiring access to the garage. The surface of the area between the existing centre and the garage is gravel, which is uneven and noisy when vehicles are manoeuvring. Combined with the opening and closing of the roller shutter doors, the existing arrangements can be noisy. This access arrangement will be closed, reducing noise and disturbance to The Firs, Willowmead and Springfield.
- 6.41 The Council's Environmental Health team has no concerns with the current application (ref. 23/00353/FULL). This application retains the existing store and proposes an infill extension. As a result, the proposal achieves a reduction in noise and disturbance to the local community by:
- 1) Minimising the extent of building works required to construct the extension (retaining the existing storage building instead of demolishing it).
  - 2) Enclosing the area between the main building and the existing store.
- 6.42 Since the centre started operating the existing rear entrance has been used as a patient access with no complaints from neighbours. The proposed rear access arrangement has been carefully designed to minimise any impact from its use through its design, position and orientation within the site. No other impacts on residential amenity are anticipated.
- 6.43 It is asserted that there are no material considerations that indicate the development should be restricted. The scheme is considered entirely acceptable in terms of its impacts and there is strong

policy support for the proposal at the national level. As a result, the material considerations weigh heavily in favour of the proposal. Accordingly, the application should be approved without delay.

## 7.0 Conclusion

- 7.1 The proposed development comprises of a small infill extension between the main Centre and the storage building to the rear of the site, minor alterations to the car park, closing the existing vehicular access from Oak Avenue and landscaping. The infill extension is single storey with a sympathetic design, including ridge and eaves heights that match the existing store. The extension will appear ancillary to the main structure.
- 7.2 The applicant is a highly successful local healthcare provider with a far-reaching impact within the local area and the wider district. The infill extension is urgently required to meet health and safety requirements. The proposal contributes to the achievement of sustainable development, particularly in terms of the health and wellbeing of the local community (the social objective).
- 7.3 Government advice is to accord substantial and significant weight in the planning balance to the delivery of schemes such as this and there are significant health and social benefits arising which are material considerations in favour of approving the scheme. There are also economic benefits and the proposal would not harm the environment.
- 7.4 The design is sympathetic with the existing buildings and will provide additional, urgently required, space for FACEmed to meet its current requirements and better facilities for the staff and patients.
- 7.5 The proposed extension comprises a small infill extension over existing hardstanding at the rear of the site. It has a very minimal impact whilst delivering a significant benefit to the efficient operation of the Centre.
- 7.6 The re-organisation of the parking and closure of one of the crossovers will provide a better layout that delivers an improvement in highway and pedestrian safety. It will also enable additional soft landscaping on the site, replacing some of the existing hardstanding with hedging and shrubs.
- 7.7 No ecological or arboricultural harm has been identified as a result of the infill extension proposal.
- 7.8 The site comprises previously developed land in the urban area with no planning policy constraints restricting the proposed development. The Development Plan is considered out of date and therefore the NPPF provides the 'Framework' under which the application should be determined.
- 7.9 It is asserted that the principle of development is acceptable, bolstered by a series of material considerations that include economic, social, and environmental benefits, which all weigh strongly in favour of granting permission for the application.
- 7.10 As such the presumption in favour of sustainable development is considered to apply and the application can be approved without delay.