

6. Consultations

External Consultees

24 neighbouring properties have been consulted, the application has been advertised in the local press on 28/1/15 and 2 site notices were posted on 21/1/15. 5 responses have been received, 4 objecting to the proposal, one in general support, raising the following points:-

Objection points

Overdevelopment/density/design

- (i) Being in the Green Belt and Harefield Village Conservation Area, the hospital needs to be very mindful of the style, density and location of its proposed development. The hospital site is now becoming over-developed and very piecemeal looking with very little thought to the overall aesthetics of the area. The main hospital building is of a very attractive period design and this bolt-on development will do nothing to enhance it. There are a number of buildings that appear to be under utilised and in bad repair and the hospital could and should consider a much better designed solution using the building footprints in other parts of the site which could also include more parking space,
- (ii) Although we do understand the need to keep the buildings close together, under other circumstances this would be regarded as gross overdevelopment of this small patch of Green Belt land. We understood that the need for temporary buildings was short term and that temporary buildings would not be used to procure space, including tree felling and establish a footprint for future development. Three large temporary buildings were recently resited and this could be used to establish a new footprint for development in the future,
- (iii) Buildings would be very close to Rickmansworth Road so that can not be viewed as infill development and will be totally visible and out of character in the Green Belt and Conservation Area,
- (iv) Application suggests that there will be more "comprehensive redevelopment" at a later date. There needs to be a master plan for the next decade,
- (v) Bit by bit development of this site has been horrific - LPA needs to look at the density of the site and the way trees have been massacred on site over recent years,

Parking/Traffic

- (vi) The 2,470sqm proposed development will provide an 18 bed ward, increasing the bed capacity at the hospital by more than 10% with extra patients, visitors, doctors and staff, all needing space for parking whereas it is not proposed to alter the current car parking provision. Although Para. 4.32 of Planning Statement advises that "the Trust will continue to manage the existing provision", parking around the hospital is already a problem with surrounding residential roads being solidly parked from early morning until evening, particularly Rickmansworth Road which is a main thoroughfare used by 2 bus routes where invariably there is a queue of traffic in both directions due to the parked cars. Parking problems were compounded when hospital introduced parking charges some years ago and this problem needs to be resolved, not exacerbated even if this means providing more and free parking on the hospital site for staff,

Tree issues

- (vii) The proposed development is close to Rickmansworth Road, where a number of mostly young trees and shrubs were removed last year without permission. This vegetation forms a valuable asset, beneficial to birds and wildlife, mitigates the light and noise pollution from the hospital and the road for both adjacent residents and Harefield Hospital patients and also screens the unsightliness of one of the hospital buildings. Any future work in this area should be kept to an absolute minimum and the trees and shrubs should be maintained and enhanced. If approved, a condition is needed to ensure a wooden fence is erected along the whole length of Rickmansworth Road to help mitigate light, noise and dirt pollution,
- (viii) There are numerous inaccuracies in the Development Site Tree Report and this report should be

properly checked, verified and corrected,

(ix) Condition needed that trees with a lifespan of twenty years plus are not wantonly destroyed and new trees are planted to replace those removed so that the integrity of the Green Belt, Conservation Area and screening is maintained,

Other

(x) Building work in the past at the hospital has frequently been carried out 7 days a week. A condition should prevent working on Saturday afternoons, Sundays and Bank holidays,

(xi) Condition of any approval needed to stop vehicles waiting to enter the site either at the entrance or on Rickmansworth Road with their engines running,

(xii) Condition required to ensure road is kept clear of mud and debris and care is taken not to pollute the atmosphere,

Supporting comments:

(i) We are in favour of the application, but we would like consideration to be given to residents as regards working hours (ie not at weekends, late at night or very early mornings), roads to be kept clear of mud, replacement tree screening and the lack of parking spaces.

HAREFIELD VILLAGE CONSERVATION PANEL:

Firstly, with the Royal Brompton and Harefield NHS Trust's long-term intentions well-known, the Panel had no objection to the proposed permanent retention of Acorn and Oak Wards. Similarly, there was no objection to the increased provision of beds for the hospital in the additional floor above Acorn Ward.

The Panel welcomed the plan forms over the proposed CT and MRI facilities and the adjoining related staff accommodation, and pitched roofs over these as they will provide enclosed plant spaces. This will preserve the outlook from the adjoining building that accommodates Wards E, F and G which will overlook these new buildings.

An aspect that concerned the Panel was the absence of any landscaping proposals and detailed planting plans. This is most unfortunate as a lot of the well-established and dense tree growth along the Rickmansworth Road that brought a finger of Green Belt into the village, has recently been removed. This has caused a great deal of distress to the neighbours. While it was accepted that many of these trees were of poor quality, as a mass they provided a very good green screen along that boundary of the Hospital site. A well planned and dense belt of semi-mature trees must be reinstated along this boundary without delay.

GLA:

I refer to your letter received on 26 January 2015 consulting the Mayor of London on the above planning application, which is referable under category 3D of the Schedule to the Order 2008. I have assessed the details of the application and have concluded that the proposal for the additional hospital development within the Green Belt would not raise any strategic issues.

Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

ENGLISH HERITAGE:

We do not wish to make any comments on this occasion and the application should be determined in accordance with national and local policy guidance and on the basis of your local specialist conservation advice.

GLAAS:

Recommend Archaeological Condition(s)

The above planning application either affects a heritage asset of archaeological interest or lies in an area where such assets are expected.

The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

I have examined the applicants' submitted Historic Environment Desk-Based Assessment (WSP December 2014) and I confirm it accords with relevant standards and guidance and that I am happy to recommend it to the LPA for approval.

The information which has been supplied with the application is sufficient in enabling us to refine the archaeological condition previously recommended by my colleague, Sandy Kidd on the 6th February 2015. I can confirm that in light of the small scale of impact, no further archaeological work is required for the works proposed for the new Holly Ward (extension above Acorn Ward to provide new 18 bed ward with associated access, linking it to the existing main block via a new bridge). The impact from the proposed single storey ground floor extension to provide additional ITU accommodation, CT and MRI scanners and associated patient, user and staff accommodation is of a large scale and may result in the removal of the medieval deer park boundary which has been recorded as an earthwork alongside Hill End Road to the north of the site and would presumably have extended into the hospital site. As such we therefore recommend a programme of archaeological works comprising a strip, map and sample excavation should be carried out in the location of the proposed MRI/CT Department and ITU Extension in accordance with the below archaeological condition.

Condition:

- A) No development for the single storey ground floor extension to provide additional ITU accommodation, CT and MRI scanners and associated patient, user and staff accommodation shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological investigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing.
- B) No development or demolition shall take place other than in accordance with the Written Scheme of Investigation approved under Part (A).
- C) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason:

Heritage assets of archaeological interest are expected to survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results.

Informative:

The written scheme of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with English Heritage Greater London Archaeology guidelines. It must be approved by the planning authority before any on-site development related activity occurs

Internal Consultees

URBAN DESIGN/ CONSERVATION OFFICER:

The proposals for the new ITU building are now acceptable in design terms. Can we condition:-

- Details of any plant, vents and A/C, particularly at roof level and method of screening, samples of external materials to be submitted
- Details of the parapet and its finish
- Details of whatever form of "art" is proposed for the elevation adjacent to the existing "gull wing" building
- Details of the design and materials for the windows, doors, glazed canopy and screens.

Acorn and Oak Wards should remain as temporary structures, including the link element. I would like to see details of the materials and glazing for the link via condition.

As previously suggested, if the opportunity arises, it would be good to remind the applicant of the benefits of a master plan for this sensitive site, so that ad hoc and potentially disjointed proposals for future development can be avoided.

HIGHWAY ENGINEER:

a. The results of car parking surveys at Harefield Hospital indicate that the majority of staff and visitors use cars as a main mode of travel. This is as expected for an area that has very poor public transport accessibility (PTAL 1b).

b. The utilisation level of on site car parks, based on survey results, is forecast to increase from 83% to 90% following the proposed development. At such high car park utilisation level, the users will experience significant difficulty in locating any unoccupied car parking spaces.

c. Site visits have confirmed that there is extensive use of over spill car parking on grass verges on site and double parking within some staff car parks. The surveys do not appear to have identified the full extent of such demand / use.

While the applicant has advised that the car parking on-site is managed by NCP, there is potential to improve the layout and information system - Variable Message Signs (VMS) on site to improve the management and efficiency of the current car park arrangements. A condition requiring submission / agreement of a car park management plan, including provision of VMS should be attached to any approval of the current planning application.

d. It is recommended that a condition be attached requiring the implementation of a Travel Plan to help monitor travel patterns and identify / implement measures to promote sustainable travel modes.

e. The traffic impacts of the proposals on the wider network have not been assessed but given the scale of increase in staff numbers and patient beds proposed, it is likely to cause an increase in demand for on-street parking in the area that is already experiencing heavy demand. The existing and future parking demand is likely to be related to hospital patients, visitors and staff avoiding parking charges and/ or on-site congestion / inconvenience. It is recommended that the applicant be required to enter a s106 agreement for funding a study and scheme for on-street parking management in the area.

Subject to the above, there are no highway objections to the proposals.

Latest comments:-

I have undertaken further analysis to assess the accumulation of vehicles on site.

Even after allowing for the reasonable car park demand for the Harefield Health Centre General Practice, the analysis of ATC traffic data indicates that the existing on site car parking provision is insufficient to accommodate even the existing demand. The consultants assessment of existing car park utilisation level of 83% and 90% with the proposed development are not realistic and significantly underestimate the existing over capacity conditions.

My previous comments remain valid and the additional analysis of the ATC data reinforces the concerns raised and the need for mitigation measures indicated.

TREE/ LANDSCAPE OFFICER

Initial comment:

Landscape Character/ Context:

Site description:

- This application relates to two sites within the Harefield hospital.
- Acorn and Oak wards are situated to the rear (south) of the west wing (wards B, C, D) of the main building and are visible only from within the site.
- These modern extensions are set within an area of open grass, with occasional specimen trees.
- The ITU unit is situated to the rear (south) of the east wing (wards E, F, G) of the main building.
- This is situated on the east edge of the hospital complex which is bounded by Rickmansworth Road, the boundary of which is part-screened by a belt of woodland planting.

Landscape Planning designations:

- There are no Tree Preservation Orders affecting trees on the site.
- However, all of the trees on site are protected by virtue of their location within the Harefield Village Conservation Area.

Proposal:

The proposal seeks the permanent retention of Acorn Ward and Oak Ward; an extension above Acorn Ward to provide a new 18 bed ward with associated access, linking it to the existing main block via a new bridge; and a single storey ground floor extension to provide additional ITU accommodation, CT and MRI scanners and associated patient, user and staff accommodation.

Landscape Considerations:

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.

- Tree survey information including an updated Development Site Tree Report, dated 7th March, and plans: Site Constraints Plan, Tree Protection Plan, Tree Amenity Category and Tree Planting has now been submitted.
- Following a site meeting and tree inspection on 1st April, a 'no objection letter' was confirmed on 7th April in response to a Conservation Area Notice (ref. CA1952) to fell 5No. trees and carry out surgery to two trees on the Rickmansworth Road frontage.
- The trees to be removed are the 'C' grade trees, referred to in the original comments (below), the subject of an initial objection.
- Their removal is now considered to be acceptable following a more detailed inspection on site. The trees are of poor quality with a limited useful life expectancy.
- Mitigation for their removal is proposed on Floyd Saski's plan ref. 15-002 which shows 15No. new replacement trees and an 'instant' native hedge proposed along the boundary - approximately 1.800metres high at the time of planting.
- The new 'instant' hedge, indicated on the Tree Planting Plan, has been implemented as advance work. This will help to screen eye-level views into the site from Rickmansworth Road.

The proposal is now acceptable subject to conditions COM6, COM8, COM9 (parts 1, 2, 3, 4, 5 and 6) and COM 10.

ACCESS OFFICER:

Whilst no objection is raised on the fundamental accessibility design features, the building by definition would necessitate patients changing into hospital provided garments in order to receive treatment. Revised plans show a small room with the figure of a wheelchair user inside and what appears to be a drop-down seat.

A wheelchair user typically needs to lie down to get dressed, particularly when changing into trousers. We would need to see a proper facility with a bed or other horizontal type changing table and an H-frame ceiling hoist.

There is ample space and this would be a new facility, so there is no reason why the changing needs of disabled people should not be provided on par with those of non-disabled people which have been catered for quite generously.

However, I am satisfied that a sufficiently sized changing cubicle/or other room for persons using a wheelchair, to include space for up to two assistants/carers with an adult sized changing table/bed with working space for an assistant/carer on each side, a 1500 mm turning circle, and an electro-mechanical means of hoisting a person from their wheelchair can be conditioned.

ENVIRONMENTAL HEALTH OFFICER (NOISE):

No objections, subject to the imposition of the following condition:-

N11B Noise affecting residential property

The rating level of noise emitted from the plant and/or machinery hereby approved shall be at least 5 dB below the existing background noise level. The noise levels shall be determined at the nearest residential property. The measurements and assessment shall be made in accordance with British Standard 4142 "Method for rating industrial noise affecting mixed residential and industrial areas".

Reason: To safeguard the amenity of the surrounding area in accordance with policy OE1 of the Hillingdon Unitary Development Plan.

SUSTAINABILITY OFFICER:

I have no objection to the proposed development with regards to energy subject to the following comments:

Condition

Prior to the commencement of development full details (including specifications) of the low and zero carbon technology required to meet the CO2 reductions set out in the Energy and Sustainability Statement (TUV, December 2014) shall be submitted to and approved in writing by the local planning authority. The details shall include roof plans and elevations for the proposed Photovoltaics. In addition, full details in relation to the size, maintenance, noise impacts and operation of the air source heat pumps shall be submitted. Full details of any other technologies shall also be submitted.

The development must proceed in accordance with the approved details and a monitoring report submitted to the Local Planning Authority on a quarterly basis for the first 5 years on completion of the development.

Reason

To ensure the reduction of CO2 in accordance with Policy 5.2 of the London Plan.

WATER AND FLOOD MANAGEMENT OFFICER:

The extent of the site is less than 1 hectare therefore no Flood Risk Assessment is required, however drainage is now a material planning consideration. The drainage statement provides some information that surface water will be restricted. Although this information is limited, and no indications are made of where this drainage will lie. From the extent of the red line boundary limited to the extent of the new building, this would appear to be outside the extent of the red line boundary and would need to be included within the area in order to place the appropriate condition on the permission.

All increase in impermeable area surface water discharge should be controlled and there are various methods which can do this by slowing down the rate at which it enters formal pipe drains. It is not acceptable to indicate that it is not possible to attenuate. Once the application boundary issue has been resolved. Further information will therefore be required and I request the following condition:

Sustainable Water Management

Prior to commencement, a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority. The scheme shall clearly demonstrate how it:

- a) Manages Surface Water. The scheme shall demonstrate ways of controlling the surface water on site.
 - i. incorporates sustainable urban drainage in accordance with the hierarchy set out in Policy 5.15 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided.
 - ii. provide information on all Suds features including the method employed to delay and control the water discharged from the site to Greenfield run off rates and:
 - a. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume.
 - b. any overland flooding should be shown, with flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).
 - iii. Demonstrates capacity and structural soundness in the receptors of Thames Water network and receiving watercourse as appropriate.

b) Foul water

i. The Scheme shall demonstrate capacity in the receiving foul sewer network or provides suitable upgrades agreed by Thames Water.

c) Ground water

i. Where infiltration techniques (soakaway) or a basement are proposed a site investigation must be provided to establish the risk of groundwater flooding on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

d) Minimise water use. The scheme shall also demonstrate the use of methods to minimise the use of potable water through water collection, reuse and recycling and will:

i. incorporate water saving measures and equipment.

ii. provide details of water collection facilities to capture excess rainwater;

iii. provide details of how rain and grey water will be recycled and reused in the development.

e) Long Term Management and Maintenance of the drainage system.

i. Provide a management and maintenance plan for the lifetime of the development of arrangements to secure the operation of the scheme throughout its lifetime. Including appropriate details of Inspection regimes, appropriate performance specification, remediation and timescales for the resolving of issues. Where there is overland flooding proposed, the plan should include the appropriate actions to ensure the safety of the users of the site should that be required.

ii. Where the maintenance will not be the responsibility of an individual householder, the details of the body legally responsible for the implementation of the management and maintenance plan must be provided.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012) Policy 5.12 Flood Risk Management of the London Plan (July 2011) and National Planning Policy Framework (March 2012) and the Planning Practice Guidance (March 2014). To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (July 2011), and conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (July 2011).

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The hospital site forms part of the designated Metropolitan Green Belt. National policy in relation to development within the Green Belt is contained within the National Planning Policy Framework (NPPF) which advises that the prime aim of Green Belt policy is to prevent urban sprawl, by keeping such land permanently open. This is to be achieved by resisting inappropriate development, which by definition is harmful to the Green Belt. London Plan policies and Hillingdon's Green Belt policies, specifically Policies OL1 and OL4 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) echo this national policy objective. However, Policy OL1 does identify Harefield Hospital as being a major developed site within the Green Belt where limited infilling or redevelopment may be acceptable.

Policy PR20 of the Hillingdon Local Plan: Part Two - Saved UDP Policies (November 2012) is the site specific policy which relates to Harefield Hospital and states that infilling and redevelopment for health purposes associated with Harefield Hospital will be acceptable in

principle where appropriate, subject to:

- (i) green belt considerations,
- (ii) compatibility with the Harefield Village conservation area;
- (iii) a comprehensive approach and appropriate phasing including provision of associated access, servicing, car parking and landscaping in accordance with the Council's current policies and standards;
- (iv) land bank provision to allow for possible future changes in the need for health services; and
- (v) where land at North Wards site is surplus to current and future Harefield Hospital requirements, a Mediparc associated with and having close operational linkages with Harefield Hospital is acceptable in principle.

Bearing in mind the self-contained character of the site, the existing close knit grouping of buildings and their future relationship with the proposed extensions, it is considered that the proposals would have no discernible adverse impact on the openness of the wider Green Belt outside of the existing built envelope of hospital buildings on site. Furthermore, the impact of the proposals on the Harefield Village conservation area and upon the need for possible phasing, access, car parking and landscaping have been assessed in the relevant sections below in the officer's report, and the extensions are to meet the hospitals requirements for additional facilities and capacity enhancement, so that the scheme is considered to fully comply with Policy PR20 of the Hillingdon Local Plan.

7.02 Density of the proposed development

Not applicable to the proposed development.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

Harefield Hospital lies within the Harefield North Archaeological Priority Area and the Colne Valley Archaeological Priority Zone, the south eastern corner of the hospital grounds, including the main built-up envelope of the hospital buildings form part of the Harefield Village Conservation Area and the hospital grounds contain a number of statutory and locally listed buildings, including the locally listed 'gullwing' building and the Grade II statutory listed Harefield Park and the stable blocks to the north east and south east of this building.

A Historic Environment Desk-Based Assessment has been submitted with the application to assess the impact of the development proposals on these heritage assets.

As regards archaeology, the assessment concludes that although a desk based study can not be taken as a definite statement on the presence or otherwise of archaeological deposits, available evidence suggests that there is only a very low to low potential for the survival of remains up to and including the Post-Medieval period and a moderate potential for remains of Modern origin. Therefore, where new groundworks are required, an archaeological watching brief is necessary to safeguard any remains.

GLAAS has been consulted who advise that the submitted assessment accords with relevant standards and guidance and is acceptable. They go on to advise that due to the very limited impact of the proposed Holly Ward, no further archaeological work is required for this element of the proposals. As regards the extension to provide additional ITU accommodation, CT and MRI scanners, this element of the proposals could involve the removal of a medieval deer park boundary, an earthwork which has been found alongside Hill End Road further to the north of the site. GLAAS therefore recommend that any approval be conditioned to require a programme of archaeological works to be carried out, comprising