

**Aneurin Bevan University Health Board  
Grange University Hospital  
Emergency Department Extension**

**Planning Statement**

Rev: 01  
Date: June 2023

**BDP.**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Reviewer</b>	<b>Description of changes</b>	<b>Sign off</b>
01	07/06/2023	G Redfern	R Hough	N/A	T Rudd

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# 1 Introduction

- 1.1 This Planning Statement has been prepared in support of a full planning application for a proposed extension to the existing Emergency Department (ED) at the Grange University Hospital (GUH), Cwmbran. The statement has been prepared by BDP, on behalf of Aneurin Bevan University Health Board (“the Health Board”).

## The applicant and proposed development

- 1.2 The Health Board was established in 2009 and manages healthcare services across the areas of Blaenau Gwent, Caerphilly, Monmouthshire, Newport, Torfaen and South Powys. This includes GP, local and community health services; the Royal Gwent, Nevill Hall and Ysbyty Ystrad Fawr Local General Hospitals; and the GUH.
- 1.3 The GUH opened in November 2020 as the designated Specialist and Critical Care Centre for Gwent, and provides care for the most seriously ill patients or those with significant injuries who cannot be safely managed at a Local General Hospital. Since opening however, the hospital’s Emergency Department has seen higher attendance than forecast, in part due to a greater-than-expected number of patients arriving by private car, and instances of overcrowding. As a result, the Health Board has identified a critical need to reconfigure and expand the ED in order to provide additional waiting spaces and assessment rooms, and in turn improve the patient and staff experience.
- 1.4 In response, the current application seeks permission for a two-storey extension to the existing ED, with a partial third storey for enclosed plant, in order to provide a new entrance and additional patient and staff facilities. Permission is also sought for associated landscaping, access and parking, including retrospective permission for 58 existing patient car parking spaces on the site. The formal description of the development is as follows:

*“Extension to existing Emergency Department building, with associated landscaping, parking and access arrangements”.*

## Structure of this report

- 1.5 This Planning Statement seeks to assess the proposed development in the context of the adopted development plan for Torfaen and other material considerations. It is structured as follows:
- **Section 2: Site and Surrounding Context** provides a description of the site and surrounding area, establishing the important planning considerations against which the proposed development will be assessed.
  - **Section 3: Need and Proposed Development** sets out the need for and describes the key aspects of the proposals, and how this has been developed following pre-application consultation with Torfaen County Borough Council, statutory consultees, and the general public.
  - **Section 4: Planning Policy Context** sets out the national and local planning policies of relevance to the proposed development.
  - **Section 5: Planning Policy Assessment** provides an assessment of the proposed development against planning policy and guidance.
  - **Section 6: Conclusion** sets out the overall conclusions to confirm the acceptability of the proposed development in planning terms.

## Application Documents

1.6 This report should be read in conjunction with the following documents:

- Application Drawings, prepared by BDP
- Design and Access Statement, prepared by BDP
- Transport Assessment, Framework Travel Plan and Active Travel Assessment prepared by ADL Traffic and Highways Engineering Ltd
- Energy Statement, prepared by AECOM
- Noise Impact Assessment, prepared by AECOM
- Ecological Assessment, prepared by BDP
- Pre-Application Consultation Report, prepared by BDP. **This document will be prepared and submitted in support of the final planning application, following the statutory consultation process.**

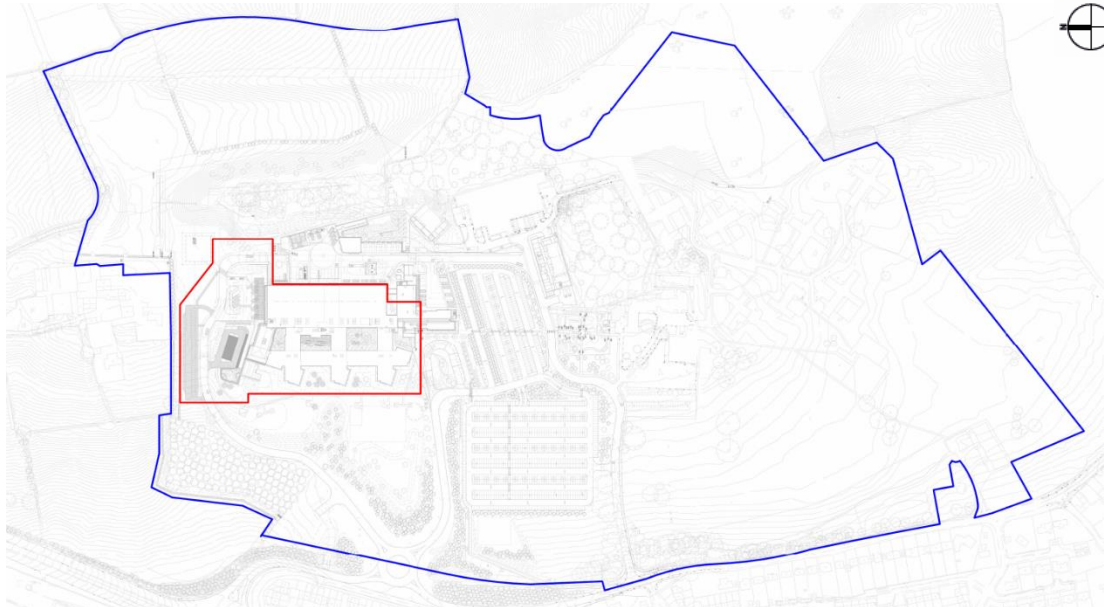
## Interface with accompanying Section 73 application

- 1.7 The series of land uses currently consented at GUH is controlled by Condition 11 of the previous outline planning permission for the hospital (12/P/00348, subsequently amended by 20/P/0535/VAR). In line with the pattern of healthcare that was envisaged at the time, this does not allow for a conventional walk-in A&E service.
- 1.8 In response, this application has been submitted in tandem with a Section 73 application to vary the wording of condition 11 accordingly. The Section 73 application considers the principle of the existing 'walk in' use, while the current application considers the principle of the proposed extension to these facilities and associated landscaping, access and parking only.

## 2 Site and surrounding context

### The application site

- 2.1 The 2.93 hectare application site (“the site”) is located in the northern part of the existing GUH campus on Caerleon Road, Llanfrechfa, Cwmbran. The extent of the site and the Health Board’s wider ownership boundary is illustrated in Figure 2.1.



*Figure 2.1: Application site boundary (red) and the Health Board's ownership boundary (blue)*

- 2.2 The site currently consists of an area of low-quality introduced shrub adjacent to the existing Emergency Department, ambulance parking, an existing car parking area with 22 spaces, and a children’s play garden; as well as the rooftop of the existing hospital. The site also includes two additional areas of car parking, with 47 spaces and 11 spaces respectively, for which retrospective permission is being sought as part of the current application. The site lies adjacent to the hospital’s mortuary yard and associated access road to the south, and helpad to the north.
- 2.3 The site is accessed from the west, via a roundabout on Caerleon Road which was brought forward as part of construction of the GUH, and has two arms serving the hospital. The northern arm runs towards the existing ED building and current application site, and is used as a dedicated access for emergency arrivals; while the southern arm runs towards a larger area of visitor and staff car parking located to the south of GUH, next to the hospital’s main entrance.

### Wider site and surrounding context

- 2.4 As discussed in the introduction to this report, the Grange University Hospital opened in November 2020 and operates as the designated Specialist and Critical Care Centre for Gwent, providing care for the most seriously ill or those with complex conditions who cannot be safely managed at a local General Hospital.
- 2.5 The existing hospital comprises 55,150sqm of Use Class D1 floorspace, has 450 beds (excluding trollies and cots), and features a 24-hour Acute Assessment Unit, ED and Helicopter Pad. The building varies between two and five storeys in height (4.6 to 28m) and was designed to meet the Health Board’s functional clinical

requirements whilst also maximising its integration with the landscape. The form is defined by three functional zones – the Care Zone to the east, the Treatment Zone to the west, and the Entrance Zone to the south, which sits adjacent to the main staff and non-emergency patient entrance. The building was also designed with an inherent flexibility to respond to future changes in use, lifestyle or demography, with the layout allowing for flexible use of space. This includes room for a series of ‘expansion zones’ which would allow future growth of the hospital by 25%. These are detailed in the Design and Access Statement accompanying the 2015 Reserved Matters application, and include the application site.

- 2.6 The application site is located in the north-eastern part of the existing hospital campus, and to the north and east is surrounded by farm buildings, agricultural land and open countryside.
- 2.7 The wider hospital site is located to the east and south-east of the town of Cwmbarn, with the town centre to the west and train station to the north-west. The hospital and Caerleon Road roundabout are connected to the wider transport network via the A4042 to the north-west.

**Planning History**

- 2.8 The GUH was originally granted Outline Planning Permission (OPP) in July 2012 (ref. 12/P/00348), with all Reserved Matters approved in May 2015 (ref. 15/P/00097). In November 2020, following development of an alternative scheme of pedestrian and cyclist links, a Section 73 consent (ref. 20/P/0535/VAR) was granted to remove Condition 27 of the OPP requiring submission of a scheme of improvements to an existing underpass at the A4042 in lieu of alternative improvements to pedestrian and cycle links.
- 2.9 In March 2023, outline planning permission was granted for the construction of a new Mental Health Specialist Inpatient Services Unit providing up to 10,000sqm of floorspace in a series of interconnected single storey buildings to the south of the existing hospital.

<b>Table 2.1 Grange University Hospital Planning History</b>		
<b>Reference Number</b>	<b>Description of Development</b>	<b>Status</b>
22/P/0446/OUT	Proposed Mental Health Specialist Inpatient Services Unit and associated highway, drainage and landscape infrastructure	Approved 16/03/2023
20/P/0573/FUL	Installation of a new Generator unit and Sub-station to support the new Hospital Sterilisation and Decontamination Unit (HSDU).	Approved 02/07/2021
20/P/0535/VAR	Variation of wording of planning condition 27 (underpass improvements) attached to outline planning consent ref no 12/P/00348	Approved 11/11/2020
20/P/0564/CEA	Creation of an extended temporary car park to provide an additional 177 no car parking spaces off of the main driveway on the LGH site.	Approved 28/10/2020
17/P/0817/FUL	Creation of an access track for the use of Dwr Cymru Welsh Water to access their apparatus to be installed as part of the development of the SCCC.	Approved 17/10/2018
15/P/00097	Details of all reserved matters, including layout, landscape, scale and appearance, relating to an Outline Planning Consent (application reference 12/P/00348) for construction of a Specialist & Critical Care Centre at the Llanfrehfa Grange Hospital site.	Approved 14/05/2015

<b>Table 2.1 Grange University Hospital Planning History</b>		
<b>Reference Number</b>	<b>Description of Development</b>	<b>Status</b>
13/P/00479	Full planning application for earth & landscaping works in the fields to the east of Llanfrechfa Grange Hospital to accommodate up to 100,500m <sup>3</sup> of relocated soil, new landscape planting, associated ecological enhancements and improved access arrangements.	Approved 03/02/2014
12/P/00348	Outline application for demolition of hospital buildings & construction of a Specialist & Critical Care Centre (D1) with up to 450 beds, hospital sterilisation unit, energy centre, helicopter landing pad & associated infrastructure.	Approved 11/01/2013
11/P/00493	Construction of service road.	Approved 17/11/2011
11/P/00176	The erection of portable office buildings, for use for a temporary period of two years, including all associated building and engineering operations along with demolition of the existing building.	Approved 25/05/2011

### 3 Need and Proposed Development

3.1 This section sets out the need for and a description of the proposed extension to the ED.

#### Need for development

3.2 The need for the proposed development has arisen as a result of the Health Board's changing clinical requirements since the GUH was designed and built. In line with the pattern of healthcare provision identified by the Health Board's Clinical Futures programme, the existing ED is primarily intended to treat patients who have been pre-triaged prior to admission, with most arriving via ambulance or helicopter following a 999 call or transfer from another healthcare facility. Since opening, there has been a greater than expected number of "walk-in" patients arriving for treatment in the ED predominately arriving by private vehicle. The existing ED has sufficient waiting capacity for 38 patients, although often experiences in excess of 70 patients, which has led to significant instances of overcrowding. At times, this has required patients' relatives to vacate the waiting room to provide sufficient seating capacity, and the overall patient experience is currently substandard. While the Health Board has sought to encourage people to consider alternative services if they become unwell, there remains a critical requirement to accommodate the number of patients arriving at the ED through expanded services. This critical need has been emphasised by recent inspections of the GUH by Health Inspectorate Wales in 2021 and 2022, which stated that actions to improve overcrowding at the ED are urgently required in order to improve both patient and staff experience.

3.3 The number of patients arriving along the ED's dedicated access road by private car has also increased and led to instances of ad-hoc parking within the hospital grounds. In response to this, in December 2021 the Health Board constructed a 47-space car park directly to the north of the ED access road, and an 11-space car park directly to the south of the access road, for which retrospective planning permission is now being sought through this application.

#### Description of the proposals

3.4 In response to the need identified, the current application seeks permission for the following:

- A two-storey extension to the existing ED building, with a partial third storey for plant, to provide a new entrance, additional waiting space, and patient and staff facilities; and enable reconfiguration of the wider department in order to ensure that all patients can be seen within appropriate timescales
- The 58 car parking spaces adjacent to the ED access road (existing facility – retrospective permission sought)
- Improved pedestrian access between the car park and new ED entrance
- Photovoltaic panels on the roof of the existing ED building
- Landscaping including biodiverse planting with seating adjacent to the existing children's play garden, and bio-retention to the north of the new building

3.5 The proposals will address existing capacity issues through the provision of additional space, and will not result in an increased number of patients or staff at the ED.

3.6 The formal description of development is as follows:

*"Extension to existing Emergency Department building, with associated landscaping, parking and access arrangements"*

- 3.7 The details of the proposals are summarised below, with further information provided in the accompanying Design and Access Statement and Application Drawings.
- 3.8 **Land use.** The proposals consist of an extension to the existing ED, which will provide 1158sqm (GEA) of additional floorspace for patient and staff facilities. As per the existing hospital, the extension will fall within Use Class D1 (residential institutions) of the Town and Country Planning (Use Classes) Order 1987 (as amended). As discussed in the introduction to this Planning Statement, the current application has been submitted alongside a Section 73 application seeking to vary Condition 11 of the previous outline planning permission for GUH, which does not currently allow for use of the ED by "walk in" patients.
- 3.9 **Layout.** The proposed extension will be located to the north-east of the existing ED and connected via a new link corridor. The entrance will be to the west of the building where patients will enter into a waiting space with e-triage facilities. Staff facilities are located on the first floor.
- 3.10 **Scale and Massing.** The extension will comprise two storeys of patient and staff facilities, plus a partial third storey for plant. The design of the building responds to the Health Board's clinical requirements, including the key driver to achieve appropriate floor to ceiling heights that can accommodate the specialist services and equipment required. This has also considered a number of other factors, such as legibility, patient dignity, and flexibility of the site. The massing and articulation of volume seeks to respect the architectural language of the existing hospital, being broken down into separate volumes to reflect the Diagnostic and Treatment block. The extension is of a lower height in order to express subservience to the main building.
- 3.11 **Appearance.** The materials palette of the building has been chosen in order to reflect its immediate context, surrounding landscape and the GUH, including the main entrance. The strategic use of colour beneath the entrance canopy aligns with the interior design of the hospital, and signposts the entrance as well as providing human scale and shelter.
- 3.12 **Building services.** The new building will incorporate renewable energy generation through provision of solar panels on the roof of the existing ED department. This will be supported by the extension of building services from the existing hospital.
- 3.13 **Access and Parking.** The extension will provide a new entrance to the Emergency Department for 'walk-in' patients who have not been triaged prior to arrival. This will be clearly signposted from the dedicated car parking facilities for ED patient arrivals, which as discussed above are accessed separately to the hospital's main staff and visitor parking facilities (as also discussed, 58 of the total 80 spaces are proposed for retrospective approval as part of the current planning application, while 22 formed part of the original GUH consent). A new network of paths and crossings connects these car parks with the ED 'front door', which has been devised to minimise conflicts with blue light vehicles and the trolley route from the adjacent helipad.
- 3.14 **Landscaping.** The proposals include high quality landscaping interventions, such as a new biodiverse seating area adjacent to the existing children's play area, and the introduction of a bioretention system to the north of the extension, to improve water quality and protect against flooding.

#### **Pre-application planning consultation**

##### Torfaen County Borough Council

- 3.15 Pre-application advice was sought via a meeting with Duncan Smith on 27 April 2023, where the emerging proposals were presented and the application route, scope and deliverables were agreed. The meeting included an outline of the critical need for the ED expansion, and broad support was indicated by the TCBC

Officer for the emerging design proposals, subject to the detailed design.

- 3.16 The approach to the transport assessment was agreed with TCBC Highways Officers via email correspondence.

Statutory pre-application consultation

- 3.17 In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), prior to submission of the planning application a 28-day period of consultation will be undertaken on the application, with comments invited from the general public, neighbouring land owners and occupiers, community consultees and specialist consultees. Once the public consultation period has ended, this section of the Planning Statement will be updated to summarise how the proposals have been updated in response to feedback received, which will also be set out in an accompanying Pre-Application Consultation Report.

Clinical staff

- 3.18 The proposals have also been developed through extensive consultation with GUH's senior management and clinical staff. This set a series of clinical design principles as discussed in the accompanying Design and Access Statement, in order to ensure that the proposals enable the provision of safe and effective care.

## 4 Planning Policy Context

4.1 This chapter provides an overview of the planning policy and guidance of relevance to the proposed development, which is set out below.

### National policy and guidance

- **Planning Policy Wales Ed.11 (2021)** sets out the Welsh Government's land use planning policy for Wales, setting a strong focus on placemaking and sustainable development.
- **Future Wales – The National Plan 2040 (2021)** is the national development framework setting the direction of development in Wales to 2040, providing a strategy to address key national priorities through the planning system.
- **Technical Advice Notes (TANs)**. The policy documents above are supported by a series of TANs which provide further guidance on a series of topics. Those most relevant to the proposed development include:
  - TAN 5: Nature conservation and planning (2009)
  - TAN 11: Noise (1997)
  - TAN 12: Design (2016)
  - TAN 18: Transport (2007)
  - TAN 15: Development and flood risk (2004; updated 2021)

### Local policy and guidance

- **Local Development Plan (LDP) (2013)** guides the development and use of land in the county borough until 2021, or until a Replacement Local Development Plan is adopted.
- **Wales Parking Standards 2014 SPG (2016)** states the Welsh Government's approach to the provision of parking, travel plans and sustainability considerations; informing developers, designers and builders what is expected of them at an early stage of the development process.
- **Development and its incorporation within the landscape: a guide for developers SPG (2000)** guides developers on the Boroughs policies to incorporate good design quality and landscaping.

### Policy designations

4.2 The application site and its surrounds are subject to the following policy designations of relevance to the proposed development:

- **SAA7, Llanfrechfa Grange Strategic Action Area, Cwmbran**. Land allocated for the construction of a Specialist and Critical Care Centre Hospital, approximately 300 dwellings and 4.8ha of associated employment (healthcare uses).
- **The Urban Boundary**
- **Special Landscape Area C2** (adjacent to site boundary)
- **Sites of Importance for Nature Conservation:**
  - Llanfrechfra Grange SINC (south of site boundary)
  - Ty Llwyd Wood SINC (south-east of site boundary)

## 5 Planning Policy Assessment

5.1 This section provides a review and assessment of the proposed development against the following planning considerations, with reference to the policy framework outlined above:

- Principle of development
- Design
- Transport, parking and access
- Landscape and visual impact
- Ecology and biodiversity
- Energy and sustainability
- Neighbouring and occupant amenity

### Principle of development

#### Policy context

5.2 Future Wales: The National Plan (2021) aims to tackle health inequalities and states that this is one of the areas of the foundational economy which the planning system can support. Planning Policy Wales (PPW, 2021 – paragraphs 3.19 to 3.21) similarly promotes the development of healthier places, and requires the planning system to consider provision of and access to a range of community and health assets including hospitals.

5.3 At a local level, Objective 2 in the Torfaen LDP Written Statement (2013) establishes the need to promote health and wellbeing through community facilities. This is further supported by Policy S2 *Sustainable Development*, which aims to promote efficient use of community infrastructure, and Policy CF3 *Community Facilities*, which states that development to improve community facilities will be favourably considered. Site Allocation SAA7 *Llanfrechfa Grange SAA, Cwmbran* provides strategic support for the development of healthcare related uses at GUH. More generally, the site is also located within the designated Urban Boundary where Policies S1 *Urban Boundaries* and S2 *Sustainable Development* support development in principle.

5.4 The principle of healthcare development is therefore strongly supported by planning policy.

#### Policy assessment

5.5 Section 3 of this Planning Statement set out the need for the proposed development, which is required to address capacity issues at the GUH ED through the provision of a new entrance, additional waiting spaces, and reconfiguration of the wider department in order to ensure that all patients can be seen within appropriate timescales. This will ensure that the Health Board can meet its clinical requirements to provide safe and effective care for the most seriously ill patients in Gwent, and achieve significant public benefits associated with the expansion and enhancement of healthcare facilities, as supported by policy at a national and local level. The principle of future expansion of the GUH is also set out in the Design and Access Statement approved as part of the 2015 Reserved Matters Application for the hospital (15/P/00097) and acknowledged in the associated Planning Committee Report.

5.6 Therefore, the principle of development, and associated community and healthcare benefits are wholly in accordance with planning policy at a national and local level.

## Design

### Policy context

- 5.7 Chapter 3 of PPW places a clear emphasis on the need for good design, which is fundamental to creating sustainable places where people want to live, work and socialise. TAN 12: Design (2016) provides further guidance on delivering good design within Wales, and Chapter 4 of the document highlights the need for well designed, flexible and adaptable buildings which are informed by an appraisal of context in order to achieve appropriate design solutions to access, characters, community safety, environmental sustainability and movement.
- 5.8 LDP Policy S4 *Place Making/Good Design* states that proposals for all new development should have full regard to the context of the local natural and built environment, which can be achieved through promotion of local distinctiveness through sympathetic design, materials and layout. Policy BW1 *General Policy – Development Proposals* states that, extensions should complement and enhance the built form, siting, materials, details and character of the original building, and its curtilage and wider area.

### Policy assessment

- 5.9 In accordance with the policy requirements set above, the design of the proposed extension follows the architectural principles and language set by the existing hospital building, while responding to its internal functional content and clearly articulating its function as a new entrance space. The scale and mass of the building is broken down into separate volumes which reflect the adjacent Diagnostic and Treatment Block, while the roof level plant room reflects the principles set by the existing building which incorporates expressed roof level engineering above main accommodation levels. By providing a decrease in height, the extension has the effect of not visually extending the block.
- 5.10 The colours and materials utilised have been selected to echo the existing treatment of the building, while providing detail and material interest at the pedestrian level including the treatment of the entrance canopy which draws the eye for patients arriving by car and on foot.
- 5.11 The design also considers the privacy and dignity of patients through the location of screens and windows. The back of the extension overlooking the mortuary will have no windows and the corridor linking the extension to the main hospital will have privacy glass, limiting the opportunity for overlooking. By contrast, the waiting area incorporates extensive glazing in order to allow views out to the Monmouthshire countryside and promote patient wellbeing.
- 5.12 As such, the proposals are considered to represent good design both aesthetically and functionally, and are in full accordance with the principles set by national and local policy and guidance.

## Transport, parking and access

### Policy context

- 5.13 Chapter 4 of PPW states that development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts. The provision of transport infrastructure in order to improve social, sustainable and economic outcomes is also supported by TAN 18: Transport (2007).

- 5.14 At a local level, Parts E (i) and (iv) of LDP Policy BW1 *General Policy – Development Proposals* require all developments to ensure the road network is capable of safely and effectively sustaining any additional traffic, with applications to be supported by a Transport Assessment where appropriate. Proposals must be designed in accordance with relevant national and local highways design guidance and the Council's adopted standards for cycle and car parking provision. Accordingly, TCBC's Parking Standards SPG (2016) states that hospitals should provide 2.5 car parking spaces per bed, in addition to any operational car parking requirements; and 1 long stay and 1 short stay cycle stand per 20 beds.

#### Policy assessment

- 5.15 As stated above, the proposals are intended to address existing capacity issues at the ED, and will not result in additional trip generation, or associated impacts on transport infrastructure, by either patients or staff. As discussed, the current application seeks retrospective permission for an existing 47-space car park to the north of the ED access road, and an 11-space car park to the south. These spaces were constructed by the Health Board in December 2021 to prevent ad-hoc parking in the hospital grounds, and supplement the existing 22 space car park at the ED which was consented through the original permission for GUH.
- 5.16 The accompanying Transport Assessment prepared by ADL Highways and Engineering Ltd confirms that, on the basis of traffic surveys undertaken, the current baseline comprises 27 two-way trips along the ED access road in the AM peak and 79 in the PM peak, which is a level that can be accommodated by the existing road network. This already includes trips to the ED by 'walk in' patients utilising the existing 47-space and 11-space car parks for which retrospective permission is sought. It is expected that this level of trip generation will continue, with no additional journeys as a result of the proposals.
- 5.17 The Transport Assessment also considers a worst-case scenario based on an increase in trips proportionate to the ED floorspace in comparison to the current baseline. This would equate to up to 8 and 25 additional vehicular trips during AM and PM peak hours, respectively, compared to the existing use of the site. Junction capacity assessment of the main hospital roundabout and Turnpike Roundabout indicates that this would not generate severe increases in ratio of flow to capacity, queues or delays. Therefore, in accordance with planning policy, the road network is considered to be entirely capable of safely and effectively sustaining this additional traffic (which, as above, is not anticipated to occur).
- 5.18 Due to the nature of the hospital use, it is anticipated that the only pedestrian, cyclist and public transport journeys associated with the ED would be made by staff, and potentially some visitors. These journeys would arrive at the main hospital entrance where shower and locker facilities are available for staff use, as there is no pedestrian or cycle access along the designated ED access road. In order to promote sustainable travel by walking, cycling, and public transport, the Transport Assessment is accompanied by a Framework Travel Plan which sets a strategy to facilitate and encourage the use of active travel and public transport, and discourage use of single occupancy vehicles, by staff working at the ED site.
- 5.19 The accompanying Active Travel Assessment also provides an audit of walking and cycling routes in the vicinity of the ED and concludes that the majority of existing infrastructure along key routes is conducive to encouraging active modes of travel. In this regard it is noted that the Section 106 agreement pursuant to the recent MHSISU consent (22/P/0446/OUT) secures a £50,000 contribution towards a strategic review of active travel connections to the GUH. Given the ED extension is not intended to increase patient or staff numbers; and in light of the financial contribution secured through the MHSISU consent; it is not considered that any further contribution or improvements are required as a result of the current proposals.
- 5.20 In terms of parking provision, as the proposals would not provide any additional bed spaces or result in additional staff trips, the provision of further cycle parking facilities in addition to those already provided at

the main ED entrance is not considered to be necessary. The total capacity of 80 car parking spaces, provided by the existing 22 space car park at the ED and additional 58 spaces for which retrospective permission is sought, is considered to align with TCBC's maximum parking standards, and accommodate parking on site without any overspill. The new pedestrian route also creates an accessible route between the car park and ED entrance.

- 5.21 As such, the proposals are considered to result in acceptable impacts on surrounding transport infrastructure, while promoting safe and sustainable travel modes, in full accordance with planning policy and standards.

### **Landscape and Visual Impact**

#### Policy context

- 5.22 While the application site is located adjacent to an extensive complex of built development associated with the existing GUH, it sits within a wider context of open countryside and agricultural land. Special Landscape Area C2/2 South Eastern Lowlands lies directly to the east of the hospital site, and is designated for its high quality landscape and rolling agricultural lowland landscape, meaning it is protected from any development that would harm the individual and distinctive features of the area.
- 5.23 Paragraphs 3.9 and 3.10 of PPW state that the special characteristics of an area should be central to the design of a development and that, in areas recognised for their particular landscape character and value the impact of development on existing character, and the scale and siting of development, will be particularly important.
- 5.24 At a local level, LDP Policy C2 *Special Landscape Areas* states that, in order to ensure the continued protection and enhancement of defined SLAs, development proposals that could impact on these designations will be expected to conform to high standards of design and environmental protection. Policies BW1 *General Policy – Development Proposals* and S7 *Conservation of the Natural and Historic Environment* more generally recognise the need to conserve and enhance the landscape setting of Torfaen, and Policy S7's supporting text notes that landscape and layout should be utilised to reduce visual impacts.

#### Policy assessment

- 5.25 In order to demonstrate acceptable impacts on surrounding landscape character, in particular SLA C2/2 to the east, the accompanying Design and Access Statement has incorporated a Landscape and Visual Impact Assessment which considers a series of views from the site surrounds. Due to the location of the site, and scale of the proposed building, effects will be limited to short-range views from the east.
- 5.26 The views assessed demonstrate that the proposed extension, which sits within the existing five-storey hospital building complex, is in keeping with this context and, through a reduced building height in comparison to the main hospital, successfully limits the effect of extending the current building mass when viewed from the SLA. The high-quality design discussed above means that the proposals are considered to have a generally positive impact on views and serve as an effective bookend to the building. The eastern field earthworks constructed as part of the GUH development also help to screen the proposals from view. Overall, the proposals have been assessed as having a minor adverse to minor beneficial effect, with limited adverse impacts minimised through the proposed design. The proposals are considered a high quality response to their context which strikes an effective balance between meeting the Health Board's clinical requirements, and minimising adverse landscape and visual effects.

- 5.27 As such, the siting, scale and overall design of the proposed extension is considered to conform to both national and local policy on landscape impact.

### **Ecology and Biodiversity**

#### Policy Context

- 5.28 PPW states that “planning authorities must seek to maintain and enhance biodiversity. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity” (para 6.4.5). This and subsequent policies in Chapter 6 of PPW respond to the Section 6 Duty of the Environment (Wales) Act 2016.
- 5.29 At a local level, the protection of the environment is further supported by LDP Policy S7 *Conservation of the Natural and Historic Environment*. This policy establishes support for the protection and enhancement of Torfaen’s natural assets including its biodiversity resources.

#### Policy Assessment

- 5.30 The planning application is accompanied by an Ecological Assessment, prepared by BDP, considering the results of desktop and Phase 1 habitat surveys at the application site, and confirms that the existing habitats on site are of low value and have negligible to low suitability to support protected species. As such, there are not anticipated to be any adverse ecological impacts as a result of the proposed development, subject to appropriate mitigation measures and watching briefs for protected fauna. The report also recommends implementation of a sensitive lighting strategy, which will be addressed during the development of detailed landscape design.
- 5.31 In addition to the measures to protect potential ecological receptors on the site, the proposed landscaping strategy detailed in the accompanying Design and Access Statement will provide enhancements to the site’s biodiversity.
- 5.32 As such, the proposals are considered to be in full accordance with policy requirements for the protection and enhancement of ecology and biodiversity.

### **Energy and sustainability**

#### Policy Context

- 5.33 In line with Welsh Government’s Net Zero Strategic Plan (2022) which aims to achieve net zero by 2050, paragraph 5.7.7 of PPW states that the planning system should facilitate the integration of sustainable building design principles in new development, and maximise renewable and low carbon energy generation. PPW also sets out the energy hierarchy for planning, which details how energy demand should be reduced, and energy efficiency increased, before introducing renewable energy generation.
- 5.34 LDP Policy S3 *Climate Change* sets a similar hierarchy of energy criteria in order to mitigate the causes of further climate change and adapt to its current and future effects; and supporting text to the policy confirms that non-residential developments will be expected to meet BREEAM “Very Good” standards.

#### Policy Assessment

- 5.35 The accompanying Energy Strategy demonstrates that the design of the proposed extension follows the

energy hierarchy set out in the policies above, by first including highly insulated facades to reduce heating demands, local shading with a low proportion of external windows to reduce cooling demands, and use of automatic lighting controls to reduce energy consumption.

- 5.36 The proposed servicing strategy is to extend building services from the existing hospital which, while not allowing for alternative heating sources, provides economy of scale for system efficiencies and reduces embodied carbon by minimising the amount of new plant equipment required. This will be supplemented by provision of solar panels on the east facing roof of the existing hospital buildings, in order to provide low and zero carbon energy generation. Overall, this will ensure that the development is able to meet its operational energy requirements in a sustainable way, in accordance with the energy hierarchy identified in planning policy.
- 5.37 The Energy Strategy also confirms that the proposals are anticipated to achieve BREEAM “Very Good”, which has been agreed as the relevant target with NHS Wales Shared Services Partnership and aligns with LDP Policy S3.

### **Neighbouring and occupant amenity**

#### Policy Context

- 5.38 PPW paragraph 6.71 highlights the negative effects that air, noise and light pollution can have on people, biodiversity and the resilience of ecosystems and states that, in proposing new development, developers must not create areas of poor air quality or inappropriate soundscape. TAN 11: Noise (2015) provides further guidance on noise impact assessment, and outlines that any additional noise of +5 dB above the baseline is considered adverse.
- 5.39 LDP Policy BW1 *General Policy – Development Proposals* states that development proposals must not have an unacceptable impact on the amenities of adjoining or neighbouring properties; or result in unacceptable adverse impacts in respect of air, noise or light pollution. The supporting text notes that development proposals can explore opportunities to mitigate the potential for noise through impact assessments at the design stage.

#### Policy Assessment

- 5.40 The proposals have been designed in order to promote the amenity of both neighbouring occupiers and hospital staff and patients. The accompanying Noise Impact Assessment identifies the nearest noise sensitive receptors to the site, reports on the result of background noise surveys, and confirms that a limit of 5dB above existing background noise levels will be set in order to suitably control plant noise, other than in emergency situations where this will be increased to 10dB. The surveys undertaken have also influenced development of the façade sound insulation requirements of the proposals.
- 5.41 As set out above, the detailed landscape design will incorporate a sensitive lighting strategy in order to ensure that there are no adverse ecological impacts. The proposals do not include any combustion plant, and therefore will not result in any impacts on air quality.
- 5.42 Overall, the proposals therefore promote the amenity of both patients and neighbouring occupiers, in accordance with the objectives of planning policy.

## **Flood risk and drainage**

### Policy Context

- 5.43 PPW (2021) resists development in areas that are at risk of flooding and requires the control of surface water runoff from developments through Sustainable Drainage Systems (SuDS).
- 5.44 At a local level, LDP Policy BW1 *General Policy – Development Proposals* similarly states that proposals must not result in unacceptable adverse effects in respect of flooding, and Policy S3 *Climate Change* requires developments to reduce surface water runoff and flood risk through the use of SuDS.

### Policy Assessment

- 5.45 The proposed development is located outside areas identified for flood risk, and is therefore in full accordance with the locational principles set by national and local policy.
- 5.46 In order to improve water quality and mitigate against surface water flooding, the proposals incorporate areas of bioretention adjacent to the proposed extension, and the existing children's play garden, which also provide multifunctional amenity benefits. As set out in the accompanying Design and Access Statement, these have been designed to meet the requirements of the SuDS Advisory Body, and consent will be sought from the SAB to confirm that the proposals are fit for purpose, designed and built in accordance with the National Standards for Sustainable Drainage.
- 5.47 As such, the proposals are considered to accord fully with national and local policy, and will not increase flood risk either on or off site.

## 6 Conclusion

- 6.1 The proposed development seeks to expand the existing Emergency Department at the Grange University Hospital through a 1,158sqm (GEA) extension which provides a new entrance, additional waiting spaces, and enables reconfiguration of the wider department. In response to existing capacity issues at the ED, this will serve to create a more purposeful, brighter and calmer environment, and ensure that all patients can be seen within appropriate timescales.
- 6.2 The proposals have been developed through a process of pre-application engagement with hospital staff and Torfaen County Borough Council. Prior to submission, the proposals will also be subject to a 28-day period of consultation with the general public, neighbouring owners and occupiers, community consultees, and special consultees. This will ensure that the proposals respond effectively to the clinical needs of patients and staff, as well as the various opportunities and constraints presented by the application site and its surrounds.
- 6.3 The assessment in Section 5 of this Planning Statement confirms that the proposed development is consistent with the objectives of planning policy, in particular the strong principle in support of healthcare development at a national and local level. The proposals are required in order to ensure that the Health Board can provide safe and effective care for the most seriously ill patients in Gwent, and are considered to result in significant public benefits associated with the expansion and enhancement of healthcare facilities, as supported by planning policy. Importantly, the new facilities are intended to address existing capacity issues, and are not anticipated to result in an increased number of patients using the Emergency Department, or associated trip generation and highways impacts. The accompanying series of technical assessments demonstrate that the proposals will have acceptable impacts on their surrounds in terms of transport and access, as well as ecology, noise amenity, and landscape and visual impact.
- 6.4 As such, the proposed development is in full accordance with planning policy at a national and local level, and should be granted planning permission.