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**Report of the Head of Planning and Development**

**STRATEGIC PLANNING SUB-COMMITTEE**

**Date: 3 June 2021**

**Subject: 2021/20167 – Pre-application for the proposed creation of a clinical building to accommodate a new Accident and Emergency (A&E) Department at Huddersfield Royal Infirmary, Acre Street, Huddersfield HD3 3EA**

**APPLICANT: Calderdale and Huddersfield Solutions Ltd.**

**DATE VALID**

23-April-2020

**TARGET DATE**

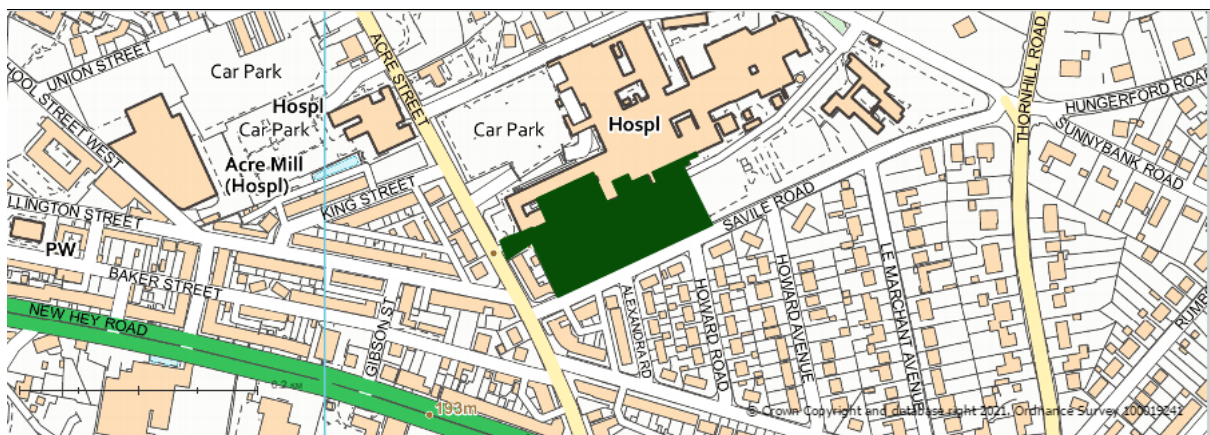
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**EXTENSION EXPIRY DATE**

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**LOCATION PLAN**



**Map not to scale – for identification purposes only**

**RECOMMENDATION:** That members note the contents of this report for information.

**1.0 INTRODUCTION**

1.1 This pre-application enquiry is brought to the Strategic Planning Committee to inform members of a potential planning application for a new clinical building to accommodate an Accident and Emergency (A&E) Department at Huddersfield Royal Infirmary (HRI).

## **2.0 SITE AND SURROUNDINGS**

- 2.1 HRI extends to 6.79 hectares within the Lindley Ward. The main facilities are bounded by Acre Street to the east, Occupation Road to the west, Savile Road to the south and the rear gardens of properties on Acre House Avenue to the north. Originally dating back to 1965, the hospital comprises a diverse range of buildings both in appearance and scale. They are spread across the site with a large surface 900+ space car park to the front of the site and further parking along the southern boundary, accessed from Acre Street and Occupation Road. These are for use by staff, patients and visitors.
- 2.2 The surrounding area is mixed but predominantly residential. It has a leafy suburban character. To the north and east it is typified by mainly detached dwellings set within generous landscaped plots and bounded by stone walls. The housing to the south and west is also traditional in appearance.

## **3.0 PROPOSAL**

- 3.1 HRI is operated by the Calderdale and Huddersfield NHS Foundation Trust (CHFT), which is an integrated Trust that provides acute and community health services. Hospital services are provided at Huddersfield Royal Infirmary (HRI) and Calderdale Royal Hospital (CRH). Together they employ over 6,300 members of staff. Each year, across both hospitals, the Trust provides treatment and care for 71,248 in-patients and 49,204 day-case patients, delivers 436,143 out-patient appointments and has 156,923 patient attendances in the Accident and Emergency departments.
- 3.2 This pre-application proposes the construction of a new Accident and Emergency (A&E) Department at HRI. Having assessed and discounted 2 other locations in the north-west corner of the estate and the site of the former Nurse's residences, it is proposed that the new facility would be located on the part of the hospital estate that is currently occupied by Savile Court (a staff residential facility close to the end of its service life) and surface car parking to the south of the existing main hospital.
- 3.3 The A&E Department is proposed as a single storey building with a ground floor footprint of circa 1950m<sup>2</sup>. It would accommodate a Majors and Minors Treatment Areas, including dedicated Paediatric facilities, together with resuscitation bays and plain film imaging rooms. Externally, it is anticipated that use would be made of ashlar stone external cladding with consideration also being given to the inclusion of standing seam through-coloured metal cladding in the building's elevational treatment. This new A&E would extend across South Drive (the road that runs through the site) to be physically linked to the existing hospital via a single storey corridor connecting to the current south pedestrian entrance. This would ensure access to key supporting clinical facilities including wards and the hospital's operating and imaging Departments. South Drive would then be diverted around it.

- 3.4 The building would incorporate a rooftop plantroom of circa 600m<sup>2</sup>. It is also proposed to create a ground level enclosure at the perimeter of the existing surface car park, to the east of the proposed facility, to accommodate a ground source heat pump.
- 3.5 The proposal seeks to re-provide the existing A&E Department currently located within the main HRI hospital building within a new purpose-built facility. The existing A&E building would be repurposed for use as storage and administrative office floorspace.

#### **4.0 CONSULTATION RESPONSES**

4.1 As part of the pre-application enquiry process the following key consultees within the Council have been contacted to seek their advice on the potential implications of such development in this location, and the measures required to mitigate any associated impacts. The advice provided by these consultees is set out within the appraisal below:

- KC Highways Development Management
- KC Conservation and Design
- KC Lead Local Flood Authority
- KC Environmental Services
- KC Ecology
- Police Architectural Liaison Officer

4.2 Their responses are outstanding at the time of writing this report.

4.3 Ward Members have been notified of the pre-application submission.

4.4 The applicant has also advised that they have undertaken extensive public consultation. A project website has been developed and due to COVID-19 restrictions, members of the public were invited to learn more about the project and provide their feedback via a digital consultation on the website which ran from Monday 8th March – Monday 29th March 2021. The event was extensively advertised as follows:

- Leaflets issued to circa 1,000 households in the vicinity of the hospital site;
- press articles were included in print in the Huddersfield Examiner and online on the Yorkshire Live website, to ensure a wider reach;
- letters sent to local businesses/community groups within the immediate area
- banners and promotion at the hospital

Extensive engagement with CHFT staff has been undertaken including Staff Management Groups, Matron and Nurse Forum, Ward Managers, Learning and Development Centre team, Senior Management and Leadership teams and CHFT BAME group).

Engagement with Lindley and Greenhead Ward Councillors and Joint Scrutiny Chairs and Officers & Place Based Scrutiny Chairs has also been undertaken.

A Statement of Community Involvement outlining the feedback from stakeholder engagement will be submitted with the application.

## **5.0 MAIN ISSUES**

5.1 The main issues are:

- Principle of development;
- Access and highway matters;
- Urban design;
- Residential amenity;
- Drainage and flood risk;
- Landscape and Ecology;
- Air quality;
- Other matters.

### **Principle of development**

5.2 The HRI site has no specific allocation within the Kirklees Local Plan. The proposed new A&E building would clearly form an essential part of the hospital estate. As such, there is no objection in principle to the proposal in land-use terms, subject to a full and detailed assessment against all other relevant policies in the Kirklees Local Plan.

### **Access and Highways**

5.3 The pre-application submission is supported by a Transport Assessment (TA) Scoping Report, which sets out the proposed approach and content of any Transport Assessment (TA) that would be submitted as part of a planning application.

5.4 It confirms that the TA would include a review of the local highway network within the vicinity of the proposed site, including the A640 New Hey Road, Acre Street, Savile Road, Occupation Road and Thornhill Road / Thornhill Avenue. It also considers the approach to parking and servicing provision. The TA will also include a review of existing cycling and pedestrian infrastructure in the vicinity of the site, and set out the existing public transport accessibility of the site, including nearby bus stops, the provision of facilities, service destinations and frequencies.

5.5 The TA identifies that junction operational assessments may need to be undertaken at the following:

- Acre Street / Accident and Emergency Site Access;
- Acre Street / South Drive (Site Access);
- Occupation Road / Site Access;

- Acre Street / Savile Road;
- Acre Street / Occupation Road; and
- Savile Road / Occupation Road / Thornhill Road N / Hungerford Road / Thornhill Road South

As part of the pre-application process, the Council's Highways Development Management Team will determine whether this is sufficient.

### Impact Assessment

- 5.6 The TA Scoping Report confirms that the forecast likely transport impacts of the proposed plans will be fully considered within the TA. The assessment will determine whether any off-site mitigation measures or improvement schemes would be required. It is noted, however, that the proposal seeks to re-provide an existing service to a purpose build facility and no additional clinical services, staff or patient numbers on site will result from this proposed development. Therefore, the proposal is likely to have a negligible impact on the highway network, minimising the need for junction assessments at the junctions.
- 5.7 The Impact Assessment will take into account a range of influences including traffic growth factors, committed developments in the vicinity, development trip generation, forecast trip distribution (based on staff, patient and visitor postcode data), junction operational capacity as well as walking/cycling and public transport impacts.

### Access

- 5.8 The proposed access to the Emergency Department, the surface level car park and for emergency 'blue light' ambulances will be via the existing Acre Street/South Drive site access to the south west of the site. The form of the new accesses is presently being determined but it is likely that priority give-way junctions will be appropriate. South Drive would be diverted around the proposed building in a U-shape, turning southwards from its current location at the western and eastern ends of the new building before turning to run west-east parallel with the hospital's boundary with Savile Road.

### Parking and Servicing

- 5.9 The proposal would result in the loss of 96 standard parking spaces. There will be no net loss of disabled parking as these would be re-provided on the application site as part of the proposed development. There is an operational overprovision of car parking spaces at HRI, with the Acre Mills car park operating at 20% capacity and there is a programme of planned resurfacing and layout works planned for this car park which will further increase provision. Therefore, there is capacity within the wider estate to offset the loss of car parking spaces on the application site. A review of proposed parking provision, including the number of car and cycle bays, accessible and electric vehicle bay provision, drop-off areas, internal site layout and general car parking operational procedures during the typical weekday peak periods, would be included in the TA and would be assessed against required provision and best practice/knowledge from other similar locations.

- 5.10 A review of servicing proposals, including specialist waste collection as required, will also be included in the TA.
- 5.11 The Council's Highways Development Management Team will consider the scoping report as part of this pre-application submission and these matters will then be fully considered as part of any future application.

### **Urban design issues**

- 5.12 Policy LP24 of the Kirklees Local Plan includes a criterion that development should ensure that it respects and enhances the character of the townscape and heritage assets. This will need to be demonstrated as part of a future planning application submission. There are no designated heritage assets immediately adjacent to the site.
- 5.13 The proposed Emergency Department is reasonably modest in scale and set comfortably within the site. It would be a single storey structure and the elevation plans currently indicate a butterfly style roof albeit with a central flat section. It would be constructed partly in local sourced York stone, which would parallel the predominant material in the surrounding area. It would also include elements of zinc standing seam cladding. The entrance would be clearly marked with the remaining fenestration of simple design and form to reflect the function of the building. These matters will be considered further through the planning application process.

### **Residential amenity**

- 5.14 Policy LP24(b) of the KLP confirms that proposals should provide a high standard of amenity for future and neighbouring occupiers. Accordingly, a key consideration in the assessment and determination of any future planning application will be the impact of the proposal on the living conditions of residential occupiers that adjoin the site, particularly those on Savile Road and the nearby streets, and especially given the 24-hour nature of the proposal. Whilst these residents already live in close proximity to the hospital estate, it is recognised that this proposal would bring the A&E department closer to the southern site boundary.
- 5.15 It is noted, however, that the new building would provide a buffer between the residents and South Drive, which would be the point of access for ambulances. Existing planting along the site boundary to Savile Road would provide additional screening. Nevertheless, to assess these matters, the Applicant has confirmed that a full Noise Assessment will be submitted in support of the application. It would consider the potential impacts arising from noise from 24 hour a day vehicle movements, assess the existing noise climate around the site and predict the future noise that would be caused by the proposed future use and also, to detail any necessary noise mitigation measures. This would also need to consider noise arising from any external plant and equipment.

## **Drainage and Flood Risk**

- 5.16 Guidance within the NPPF advises at Paragraph 163 that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. This approach is reinforced in Policy LP27 of the KLP, which confirms, amongst other matters, that proposals must be supported by an appropriate site specific Flood Risk Assessment (FRA) in line with National Planning Policy. Policy LP28 of the KLP relates to drainage and notes a presumption for Sustainable Drainage Systems (SuDs) and also, that development will only be permitted if it can be demonstrated that the water supply and waste water infrastructure required is available or can be co-ordinated to meet the demand generated by the new development.
- 5.17 The site is in Flood Zone 1 on the Environment Agency's Flood Map for Planning. This means that it is land that is at the lowest risk of flooding from main river sources. There have also been no previously reported flood incidents on the site.
- 5.18 The Lead Local Flood Authority (LLFA) advise that the Council aim to promote sustainable drainage throughout the district. The LLFA therefore expect developers to follow the drainage strategy hierarchy, as described in National Planning Practice Guidance: Flood Risk and Coastal Change. The LLFA acknowledge that the applicant will likely wish to keep the current drainage method for the site if it is positively drained. However, they would expect a minimum reduction to the discharge rate of 30% in the 1 in 1 year storm event. Soakaways are likely to be a viable option given that the site is relatively flat.
- 5.19 Assuming the red line boundary of the application site is below 1ha, a Flood Risk Assessment would not be required. The applicant has confirmed, however, that a Drainage Strategy will be submitted to support the application.

## **Landscape and Ecology**

- 5.20 Policy LP33 of the KLP advises, amongst other matters, that proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.
- 5.21 In this case, there is some existing planting around the edges of the site. There are a few individual and groups of trees along the western (Acre Street) boundary, individual trees along the northern boundary, reinforced by trees and planting within the rear gardens of properties fronting Acre House Avenue, individual mature trees along the eastern (Occupation Road) boundary, and individual and groups of trees along the southern (Savile Road) boundary reinforced by self-seeded. There is a Tree Preservation Order (TPO Ref: 60/92/t11, 12, 13, 14) in force across the wider hospital site.

- 5.22 The applicant has submitted an Arboricultural Impact Assessment with the pre-application submission. It confirms that the proposal would require the removal of 24 individual trees to accommodate the development. This would include trees located within the footprint of the new facility and also those that would be lost as a result of level changes within their Root Protection Area (RPA) such that tree retention would not be feasible. These trees are not covered by the TPO.
- 5.23 The trees identified for removal include Norway maple, mature sycamore, ash, whitebeam and rowan trees, most of which are in a good or reasonable good condition with the mature sycamore being of a high quality and value. The Impact Assessment acknowledges that the removal of trees will be of detriment to the arboricultural values of the site but notes that their loss must be weighed against the benefits of the proposed development. There is also scope on site for new tree planting as part of a landscaping scheme and the planting of new trees would help to mitigate the loss of the vegetation requiring removal and can be designed to improve the aesthetic value of the site. The Council would expect an appropriate replacement package as suitable mitigation and these matters will be considered fully by the Council's Arboricultural Officer in responding to this pre-application and the future planning application.
- 5.24 Turning to Ecology, Policy LP30 of the KLP confirms that the Council will seek to protect and enhance the biodiversity and geodiversity of Kirklees. The applicant has prepared a Preliminary Ecological Appraisal Report (PEAR). Savile Court, which would be demolished as part of this proposal, is identified as having negligible bat roosting potential. However, it is acknowledged that the site has foraging potential for bats through the range of flora species and the invertebrate population that the vegetation supports. The other main potential of the site relates to nesting birds and it is acknowledged that the proposed development is likely to see the removal of some of these habitats.
- 5.25 The PEAR therefore recommends that on completion of works, the number of felled trees removed be replaced with native species of local provenance on a three-for one-basis. It also recommends that a Biodiversity Enhancement Plan should be designed pre-construction to be implemented post construction during the landscaping phase of the development. This would be performed alongside the Biometric 2.0 Calculation to demonstrate a biodiversity net gain of at least 10% post development.
- 5.26 The applicant has confirmed that an Ecological Impact Assessment will be submitted in support of the planning application along with a demonstration of bio-diversity net gain.



## **Air quality**

- 5.27 The West Yorkshire Low Emissions Strategy (WYLES) -Technical Planning Guidance divides applications into 3 impact types (Minor, Medium and Major) using specific criteria to determine the type. Actions and mitigation requirements are dependent on the development use class and which impact type it is classified as. The proposed development has been reviewed in accordance with WYLES and because of the size of the development, the application would be classified as at least a 'Medium' impact type.
- 5.28 It is important that the proposed development does not adversely affect local air quality. The applicant has confirmed that an Air Quality Impact Assessment will be submitted in support of the application. The Council would also expect the details of the provision of Electric Vehicle Charging Points (EVCP) to be included with any future application. The applicant has indicated their intention to do so within the pre-application submission in any event.

## **Other Matters**

- 5.29 The applicant will be advised that the Council approved a Climate Emergency at its meeting of full Council on 16/01/2019. Additionally, the West Yorkshire Combined Authority's pledge for the Leeds City Region to reach net zero carbon emissions by 2038 such that any forthcoming applications must respond positively to these policies and initiatives.
- 5.30 The proposal is seeking to achieve a minimum BREEAM 'Very Good' and the pre-application refers to the installation of ground source heat pumps and in this regard. The applicant has confirmed that a Sustainability and Energy Report will be submitted in support of the application setting out how the proposal seeks to minimise the carbon footprint of the development, both in its construction and operation.
- 5.31 The West Yorkshire Police 'Designing out Crime' Officer has also considered the pre-application submission and has advised that from a security perspective for the site, consultations are ongoing so that 'Secured by Design' can be incorporated into the design plans for any future application.

## **6.0 CONCLUSION**

- 6.1 This pre-application is brought to the Strategic Planning Committee to inform members of a potential planning application for a new A&E Department at HRI. This report sets out the key considerations for any future planning application.

## **7.0 RECOMMENDATION**

- 7.1 That members note the contents of this report for information.