Representation to Draft Brentwood Local Plan

Spire Hartswood Hospital, Brentwood

March 2016

These representations are made on behalf of Spire Healthcare in response to the publication of the Provisional Draft Brentwood Local Plan.

Spire Hartswood Hospital is currently situated on Eagle Way, Warley. The site is relatively small and is constrained by Tree Preservation Orders. Various planning permissions have been granted to extend the hospital and to decant services to other locations. However this is simply addressing existing operational difficulties and is not sufficient to meet longer term demand for health facilities at this location.

Spire Healthcare therefore has a longer term strategy to relocate the hospital to provide a new larger state of the art 'Spire Essex Hospital' facility, providing services and treatments that are akin to a central London private hospital. A site has been identified to deliver this new purpose built facility and is located at Junction 12 of the A12 on Chelmsford Road. This site is located within a proposed Gateway Area within the Emerging Local Plan. (A site location plan is enclosed).

The representations made below are directed to specific key points within the draft Plan. For clarity, we deal with these points sequentially, noting the section at the start.

Strategic Objectives

Comment: The borough of Brentwood is extremely constrained in terms of identifying future opportunities for development and expansion, given that 89% of the Borough is designated as Green Belt. In this respect, the strategic objectives that address 'Managing Growth' are supported, in particular, Objective SO1, which recognises the important role that the Borough's transport corridors can play in supporting growth, where locations are well served by existing and proposed local services and facilities. In this respect, strategic objective SO7 is also important and supported, as it seeks to make the most of the benefits that will be bought to the Borough by Crossrail, providing a faster and more frequent link to and through London.

Spatial Strategy

Policy 5.1 seeks to focus new development on land within the Borough's Transport Corridors with Brentwood and Shenfield being the main focus for development in the A12 Corridor. This will include the limited release of Green Belt land within the Transport Corridors at strategic locations in order to deliver self-sustaining communities with accompanying local services. The Policy states that such sites should have defensible boundaries to avoid urban sprawl. In determining the suitability of such sites, the policy requires that they should:

- (a) be accessible to public transport and other services and facilities;
- (b) have no significant impact on the Green Belt and other built and natural landscape considerations;



(c) are likely to come forward within the Plan period.

Comment: Our client welcomes the recognition within Policy 5.1 of the importance that the Borough's transport corridors can play in providing sustainable, well connected locations for additional development within the Borough. In doing so the Policy acknowledges that there will be limited release of Green Belt land for development within these corridors.

The proposed location of the new Spire Essex hospital is located within the A12 transport corridor (and a Key Gateway site), and as such reflects the Council's objective to locate additional development at well connected, spatially strategic points within the Borough.

In addressing the above criteria, the following can be stated about the proposed hospital site:

(a) Access to Services and Public Transport:

As a Key Gateway site, the proposed hospital site is located at a key road junction within the Borough where access from the A12 is provided south into the Borough.

The proposed site also presents a more accessible location via sustainable transport modes than the existing hospital site. It is located 1.5km north of Shenfield and the station. Shenfield has a good network of bus services, with Routes 351 and 435 serving the site. Crossrail will be operational from Shenfield Station by 2019, providing a fast route into and through London. This link and the proximity of the proposed site to Shenfield Station provides obvious sustainable transport options for this site, that cannot be replicated at either the existing site or alternative locations in Brentwood such as the West Horndon location.

The hospital would operate a Green Travel Plan (as it already does at its existing location) to promote a car sharing for staff. It would also provide electric car charging points.

In terms of services and facilities, the proposed use itself will provide a vital service to the residents of the Borough, maintain and significantly enhance the facilities offered at the existing site. Whilst this is a private hospital, the facility is utilised by a large number of residents within the Borough, who are either self-funding or benefit from corporate membership. The table below highlights the comparison between the existing and proposed services.

Existing Hartswood Hospital, Great Warley Internal floor area 4,474 m ²	New Spire Essex Hospital – key facilities proposed floor area 10,522 m ²
Surgical procedures	
3 main operating theatres each 33m ² . Planning consent granted for a 4th theatre (also 33m ² and operational from Nov 2016) to increase capacity while we await new hospital Theatre recovery bays x 4	6 main operating theatres each 55m² with potential within floor design for 7 th theatre to be added later. Theatre facilities include one larger 'hybrid' theatre for major vascular procedures and cardiac surgery, and a robotic theatre for major internal surgery and cancer surgery.
Out-patient minor operations room x 1	Theatre recovery bays x 12 Out-patient minor operations rooms x 2



Critical care unit x 6 beds including one isolation room and relatives/counselling room. Increased space around each bed will allow for 'critical care level 3' to be provided (prolonged life support)
Standard size in-patient en-suite bedrooms x 40
Parent and child en-suite bedrooms x 6, also suitable as executive rooms
Private pods with recovery recliners for patients having day care surgery x 26
Consulting/examination rooms x 26
Gymnasium: 70 m ²
Hydrotherapy – standard size pool
Individual treatment rooms x 10
The therapy gym and pool will treat elite sportsmen and women, dancers and senior executives with intensive Spire Perform rehabilitation protocols as used at the National Football Centre at St George's Park.
100 m ² with expanded space for histology (tissue analysis) and blood transfusion. Blood transfusion service would be a hub for other Spire hospitals at Redbridge and Southend
MRI scanners x 2
CT scanner x 1
Nuclear medicine service using SPECT-CT scanner
DEXA whole body bone density scanner
Digital X-ray with latest low dosage equipment
No change



(b) Harm to the Green Belt

By virtue of the fact that the transport corridors along the A12 and A127 (which are located mainly within the Green Belt) have been identified as strategic locations for development, indicates that there is an acceptance that a proportion of required new development within Brentwood will be on Green Belt land. Whilst this does not result in the automatic approval of development at these locations, this approach has been given detailed consideration by the Council and we support this work.

The design and layout of the proposed hospital will take account of the site's location within the Green Belt, and mitigate as far as is practical, harm to the openness of the Green Belt by incorporating landscaped areas around the hospital (assimilating the buildings into the landscape). Moreover, there will be a need to demonstrate very special circumstances for the proposals, which can be summarised as follows:

- (i) There are no other [non-green belt] alternative sites that would meet the locational requirements of the hospital
- (ii) The need for enhanced healthcare facilities (benefitting private and NHS patients)
- (iii) The economic and employment benefits (including employment training)
- (iv) Sustainability Benefits
- (v) Release of a brownfield site for residential development

(c) Phasing

Spire is looking to bring forward this site as soon as possible, with a planning application intended to be submitted later this year. It will therefore be hoped to be delivered within the first 5 years of the plan period.

Key Gateways

Policy 6.5 refers to development proposals in the vicinity of key gateways into the Borough. The aim of these sites is to enhance a positive impression of the Borough, with development helping to create a distinctive and clear entry into Brentwood.

The Key Diagram on page 35 identifies the junction between the A12 and the Chelmsford Road A1023 as a Key Gateway into the Urban Area of Brentwood. This reflects the acknowledgement within Policy 6.5 that highways junctions should contribute to the aims of the Key Gateways sites.

Comment: Our client is very supportive of the aims and objectives of the Key Gateway sites policy. In particular, Spire supports the identification of the junction between the A12 and Road A1023 as a Key Gateway, as it represents a key entry point for vehicular traffic, travelling along the A12, and traffic entering the Borough to access Shenfield and Brentwood.

The Plan notes that some of the identified Gateways offer attractive business locations offering excellent opportunities for development. Spire's proposals to provide a new state of the art hospital for Essex at this site will meet all the aims and objectives of the Key Gateway policy. The proposals will seek to provide a high quality building that marks a Gateway into Brentwood from the A12. The design of the building seeks to provide a positive impression for the Borough, whilst at the same time, being of a scale and layout that



is sensitive to the neighbouring residential and the surrounding Green Belt. Appropriate landscaping will also be a key consideration, and seek to reflect the local landscape.

Managing Growth

Policy 6.2 seeks to make the best use of existing settlements through the use of previously developed land.

Comment: Our client is supportive of this policy. It acknowledges the importance that previously developed land and redundant uses within the settlement boundary can make to deliver the Council's overall Spatial Strategy.

The existing Spire Hartswood Hospital in Brentwood represents one such opportunity, which will contribute to housing need within the Borough.

Green Belt Development

Policy 9.8 seeks to protect the Green Belt from inappropriate development in line with the NPPF, and states that development proposals within the Green Belt will be assessed against national policy and guidance.

This policy is set against the context that the borough of Brentwood is extremely constrained in terms of identifying future opportunities for development and expansion, given that 89% of the Borough is designated as Green Belt.

This policy should be considered against this context and the Council's growth strategy, which includes limited release of Green Belt land, some of which is along the two main transport corridors within the Borough.

Comment: Our client accepts that the Council should apply the national policy position in relation to proposals for Green Belt development. This is however in the context that the Borough is extremely constrained by Green Belt, and that part of the Council's Growth Strategy includes the limited release of Green Belt sites, and also the development of Key Gateway sites, many of which fall within the Green Belt designation.

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