
Planning, Design and Access Statement

Temporary Staff Car Parking,
Dunstable Road, Luton

February 2020

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**Luton and Dunstable University Hospital
Temporary Staff Car Parking,
Dunstable Road, Luton**

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of the Luton and Dunstable University Hospital NHS Foundation Trust ("the Applicant") in support of an application for full planning permission for the temporary use of land for staff car parking (for a period of five years from the date of Decision Notice).

1.2 The Application Site extends a total of 0.57 hectare, comprising 2 no. plots of land to the south of Dunstable Road, Luton:

- Car Park A (West) extends 0.25 hectare and includes land to the rear of Nos. 779, 783 and 785 Dunstable Road, accessed through the site of No. 781 Dunstable Road; and
- Car Park B (East) extends 0.32 hectare and includes land to the rear of Nos. 767 and 769 Dunstable Road, accessed through the site of No. 771 Dunstable Road.

1.3 Both plots of land are directly adjacent to Dunstable Road and the application proposals therefore include the creation of 2 no. new points of access (vehicle and pedestrian) from the public highway. Detailed access drawings are hereby submitted for approval as part of the Proposed Development.

1.4 The Application Site is currently vacant, comprising land that was previously occupied by residential units (Nos. 771 and 781 Dunstable Road) and associated gardens and backland.

1.5 The description of the Proposed Development is as follows:

"Change of use of 2 no. vacant plots to provide temporary car parking for staff at the Luton and Dunstable University Hospital for a period of five years."

1.6 This Planning Statement has been prepared to provide a rationale for the grant of planning permission for the Proposed Development. It provides a description of the Site and surroundings (Section 2), an explanation of the Proposed Development (Section 3) and an overview of relevant planning history (Section 4). It provides an analysis of the Proposed Development against the adopted Development Plan (Section 5) and against other Material Considerations (Section 6). It summarises design and access issues

(Section 7) and assesses the key planning considerations, the planning balance and conclusions (Section 8).

1.7 In addition to the drawings for approval, the application package includes the following documents:

- Transport Statement (including the Hospital Car Parking and Access Strategy);
- Noise Report;
- Air Quality Report;
- Drainage Strategy;
- Operations and Security Statement; and
- Site Waste Management Statement.

2.0 SITE DESCRIPTION AND SURROUNDINGS

Luton and Dunstable University Hospital

- 2.1 The Luton and Dunstable University Hospital (the "LDUH") is located towards the north western edge of Luton, approximately 2km east of Dunstable and 5km north west of Luton town centre. It lies to the west of the M1 motorway, close to Junction 11. The main Hospital Site lies to the north of Dunstable Road, east of Lewsey Road, west of Faringdon Road and south of Calnwood Road.
- 2.2 The LDUH has occupied its current Site since 1939; hence, this year, it is celebrating 80 years of service. The Hospital Site has developed significantly during its history, including the construction of a nurse training school during the 1940s, followed by the later addition of a medical wing, accident service, outpatients, medical centre, surgical block and maternity unit.

Dunstable Road Temporary Car Parks

- 2.3 The Application Site lies to the southwest of the main Hospital Site. It comprises of 2 no. plots of land to the south of Dunstable Road, approximately opposite the junction with Shakespeare Road. The Site extends to a total of 0.57 hectare in total and is delineated on the Site Location Plan (**Appendix 1**).
- 2.4 The western plot (Proposed Car Park A) extends 0.25 hectare and comprises land to the rear of Nos. 779, 783 and 785 Dunstable Road, accessed through the site of No. 781 Dunstable Road. The plot is currently vacant land. There are no buildings on the plot.
- 2.5 The eastern plot (Proposed Car Park B) extends 0.32 hectare and comprises land to the rear of Nos. 767 and 769 Dunstable Road, accessed through the site of No. 771 Dunstable Road. The plot is currently vacant land. There are no buildings on the plot.

3.0 PROPOSED DEVELOPMENT

The Development Proposals

3.1 The description of the Proposed Development is as follows:

"Change of use of 2 no. vacant plots to provide temporary car parking for staff at the Luton and Dunstable University Hospital for a period of five years."

3.2 The application seeks full planning permission for the temporary use of the Site for staff car parking. This includes the creation of 2 no. car parks, each with a new point of access from the highway on Dunstable Road.

3.3 The western plot (Car Park A)(land to the rear of 779-785 Dunstable Road) will provide 85 car parking bays.

3.4 The eastern plot (Car Park B)(land to the rear of 767-769) will provide 122 car parking bays.

3.5 The Proposed Development includes the surfacing of the ground to accommodate the parking bays and aisles. It is proposed that this will include access roads in tarmac and parking bays in cellular pavers infilled with gravel.

3.6 The Proposed Development includes the erection of boundary fencing, comprising of timber boards to a height of 2.4 metres with gravel boards mounted on concrete fence posts.

3.7 Access and egress will be controlled by new traffic barriers. Detailed design of the barriers is included within the application proposals for approval. These barriers will allow controlled access for staff only. Lighting and CCTV will be installed, in keeping with the Operations and Security Statement.

Rationale

3.8 The Proposed Development will provide a total of 207 car parking spaces. These will be for the exclusive use of staff at the LDUH, controlled by vehicle barriers.

- 3.9 The 207 car parking spaces will provide temporary staff car parking during the construction of the partial redevelopment of the LDUH, as set out in current Application Ref. 20/00100/FUL.
- 3.10 The Proposed Development is therefore an important enabling project which will allow the partial redevelopment of the Hospital and Lewsey Road Car Park to take place and minimise the impact of the development during the construction phase.
- 3.11 A Transport Statement will accompany this submission to provide the rationale for the Proposed Development of the temporary car parking on Dunstable Road, within the context of the Hospital Car Parking and Access Strategy.

4.0 PLANNING HISTORY

Land to the rear of 779-785 Dunstable Road (Western Plot)(Car Park A)

- 4.1 In February 2001, planning permission was granted for the development of three detached dwellings. The planning permission was renewed in April 2004.
- 4.2 In October 2008, an application was submitted for the erection of a 32-unit residential care home and a three-bedroom detached dwelling. However, this was withdrawn.

Land to the rear of 767-769 Dunstable Road (Eastern Plot)(Car Park B)

- 4.3 In October 2008, an application was submitted for the erection of a detached two-bedroom bungalow and a 34-bedroom residential care/nursing home. This was subsequently withdrawn. In September 2009 a resubmission was made, including the erected of a detached two-bedroom bungalow and a 30-bedroom residential care/nursing home. This was refused in December 2009 and a subsequent appeal dismissed in December 2010.
- 4.4 In September 2012, planning permission was refused in relation to an application for the development of land for residential use and erection of a nursing home with care facilities.

5.0 DEVELOPMENT PLAN

5.1 This section of the Planning Statement sets out the existing Development Plan policies relevant to the consideration of this planning application. The following section (Section 6) assesses other Material Considerations, including relevant national planning policy and guidance.

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that planning decisions must be made in accordance with the Development Plan unless other material considerations indicate otherwise. This is reinforced at paragraph 12 of the NPPF, and paragraph 47, which states:

"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."

5.3 The adopted Development Plan is the Luton Local Plan, which was adopted in November 2017 and covers the period 2011-2031.

5.4 The Luton Local Plan sets out the Council's commitment to promoting healthy communities alongside highlighting the importance of achieving sustainable development. Alongside the statutory responsibility to improve the health and wellbeing of the community, under the Health and Social Care Act 2012, the local planning authority is also to ensure that health and wellbeing and health infrastructure is considered as part of the local plan process (as referenced at paragraph 1.22 of the Local Plan).

5.5 Local Plan Policy LLP1 *Presumption in Favour of Sustainable Development*, sets out that wherever possible, the Council will work proactively and positively with all applicants to help shape development proposals to deliver growth and sustainable development that can be approved without delay. It reiterates the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF).

5.6 The application proposals should be considered positively within the context of Policy LLP1, as the Proposed Development will facilitate the smooth running of the LDUH during the partial redevelopment. The provision of temporary car parking for staff at the Application Site will facilitate the delivery of the Hospital Car Parking and Access Strategy,

including the ongoing provision of safe and secure car parking to ensure that traffic congestion in the local area is minimised.

- 5.7 Local Plan Policy LLP24 *Education and Other Community Facilities* seeks to protect the provision of education and community facilities. It states that planning permission will be granted for development that contributes towards an identified need for community facilities and services. The Proposed Development accords with Policy LLP24, ensuring the ongoing provision of healthcare services through safe and efficient staff car parking at the LDUH.
- 5.8 Local Plan Policy LLP25 *High Quality Design* seeks development to be of high-quality design which creates places that are safe and accessible. Under LLP25, new development is to enhance the distinctiveness and character of the local area, responding positively to the townscape, street scene, site and building context, and natural features including biodiversity. The Proposed Development complies with Policy LLP25, bringing currently underutilised and derelict land back into active use. The application proposals include full details, including the use of high-quality materials for surfaces, boundary treatment and structures (traffic barriers, lighting and CCTV). This ensures a good standard of development which will ensure a positive contribution to the street scene.
- 5.9 Local Plan Policy LLP31 *Sustainable Transport Strategy* sets out the Council's sustainable transport strategy for Luton based on the vision for the Local Transport Plan 2011-2026. LLP31(B) states that planning permission will be granted for proposed developments that meet a number of criteria, including the following which are relevant to the Proposed Development at Dunstable Road:
- iii. reduces road congestion, particularly at peak times;
 - iv. reduces the safety risk to motor vehicles, non-motorised, and vulnerable users; and
 - v. ensures the quality of the local environment is not compromised.
- 5.10 The Proposed Development includes the erection of a traffic barrier. This will provide the ability for the LDUH to allow the controlled use of the car parks for staff only. In accordance with Policy LLP31, this will reduce security risks and will not compromise the quality of the local environment.
- 5.11 Local Plan Policy LLP32 *Parking* states that parking provision at the Luton and Dunstable Hospital will be stringently controlled to ensure that on site provision is prioritised. Within this policy context, the LDUH NHS Trust is committed to providing car parking for both

staff and visitors whilst also promoting the use of sustainable modes of travel in accordance with best practice. It is in the context of facilitating the partial redevelopment of the LDUH and the construction of a new multi-level car park at Lewsey Road (current Application Ref. 20/00100/FUL) that the Trust is seeking planning permission for the creation of temporary staff car parks on Dunstable Road. The grant of planning permission will allow for staff car parking at the Hospital to be temporarily reallocated for visitor use during construction phases. In accordance with the Hospital Car Parking and Access Strategy, this will ensure that an appropriate level of car parking is provided and minimise impacts on the local highways network including congestion.

6.0 MATERIAL CONSIDERATIONS

- 6.1 This Section provides a summary of Material Considerations that are relevant to the determination of this planning application.

National Planning Policy Framework

- 6.2 The revised National Planning Policy Framework (NPPF) was published in July 2018 with minor amendments in February 2019. It sets out the Government's planning policies for England and explains how these should be applied to development proposals. While the NPPF does not form part of the development plan, it is a material consideration in the determination of planning applications.
- 6.3 The NPPF states that **"the purpose of the planning system is to contribute to the achievement of sustainable development"** (paragraph 7). It adds that proposals must meet economic, social and environmental objectives, which are interdependent.
- 6.4 Paragraph 10 states that **"a presumption in favour of sustainable development"** lies at the heart of the NPPF. For decision-taking the presumption in favour means **"approving development proposals that accord with an up-to-date development plan without delay"** (paragraph 11).
- 6.5 Chapter 4 of the NPPF relates specifically to the decision-making process and the determination of planning applications. Paragraph 38 sets out that **"local planning authorities should approach decisions on proposed development in a positive and creative way"**. As discussed in detail in Section 5 of this Planning Statement, the Proposed Development complies with all relevant development plan policies. In accordance with the approach set out in the NPPF, the application should therefore be considered by the Council for approval without delay.
- 6.6 Chapter 12 of the NPPF seeks to achieve well-designed places and puts an emphasis on the creation of high-quality places as a fundamental aspect of what the planning and development process should aspire to. Paragraph 124 states:

"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

- 6.7 Paragraph 130 also requires that Local Planning Authorities not to object to development on design grounds where it accords with clear expectations in plan policies.
- 6.8 In addition to the above considerations, the Proposed Development will facilitate the partial redevelopment of the LDUH (current Application Ref. 20/0010/FUL), which will deliver long term improvements to the Hospital environment, including improved car parking provision. This will assist in alleviating congestion on Lewsey Road, Calnwood Road and the local highway network. This embraces the objectives set out in the NPPF, reducing the impact of development and ensuring that sites are used effectively.

Planning Practice Guidance

- 6.9 In addition to the NPPF, the Government publishes Planning Practice Guidance (PPG) to provide additional guidance on specific topics.
- 6.10 The PPG on Health and Wellbeing (updated July 2017) states that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in both plans and planning decision-making (paragraph 001). The PPG emphasises the important links between health and planning. It refers to the NPPF's encouragement of local planning authorities engaging with relevant organisations to ensure that local strategies and the provision of required health infrastructure are supported in plan-making and the determination of planning applications (paragraph 002).

7.0 DESIGN AND ACCESS

- 7.1 This Section of the Planning Statement summarises the key design and access issues relating to the Proposed Development. In line with Planning Practice Guidance (*Making an Application*), a planning application of the scale and use proposed would not require a Design and Access Statement to be considered by the local planning authority. However, for completeness this Section includes a short assessment of relevant design and access issues.

Design

- 7.2 The Proposed Development provides two temporary car parks for Hospital staff. However, the design of the scheme has been carefully considered to ensure that it creates a safe and attractive environment. Hence, the layouts of the proposed car parks have been bespoke designed by the Applicant's civil engineer (Perega) to accord with best practice guidance. The use of materials for surface treatment, traffic barriers and fencing has been carefully considered to ensure a high-quality finish. Lighting and CCTV will be installed in accordance with ILP Guidance, to ensure safety and security whilst also ensuring compliance with appropriate regulations to reduce obtrusive lighting.

Access

- 7.3 The Proposed Development includes the creation of 2 no. new points of access from the Highway. Detailed access drawings have been prepared by Perega and pre-application consultation with Highways Officers at Luton Borough Council has been undertaken, including a site meeting and email correspondence to agree access design (Ref. Kevin Murphy).

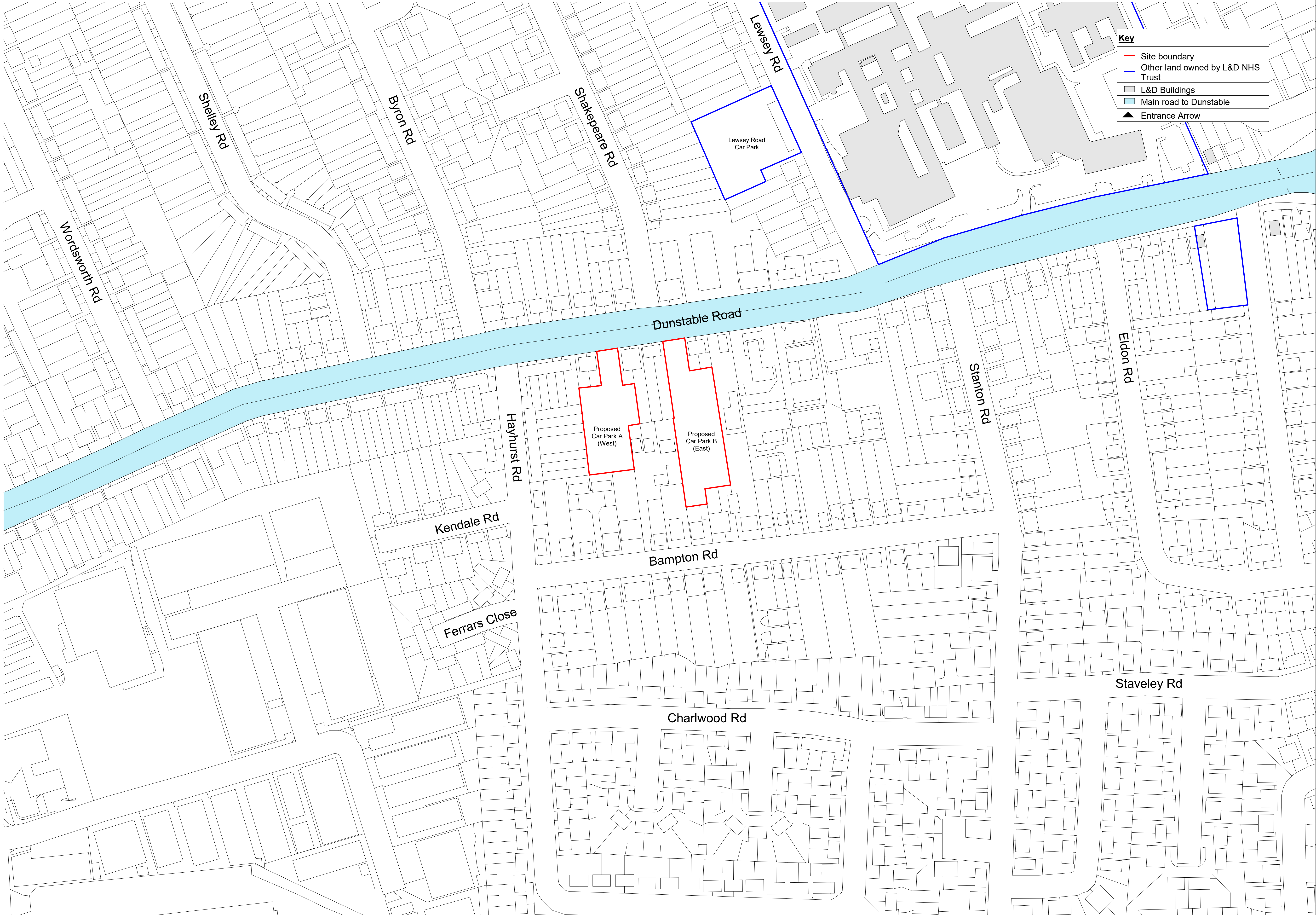
8.0 PLANNING BALANCE AND CONCLUSIONS

- 8.1 This Section of the Planning Statement provides an analysis of key planning considerations, planning balance and conclusions.
- 8.2 The Application seeks full planning permission for the temporary use of 2 no. plots of currently vacant land to the rear of 767-769 and 779-785 Dunstable Road for staff car parking for a period of five years from the date of the Decision Notice. The Proposed Development will provide a total of 207 car parking spaces for the exclusive use of staff at the LDUH, controlled by vehicle barriers.
- 8.3 The application proposals include the creation of 2 no. new points of access from the public highway. It also includes details of materials for surface treatment, boundary treatment, lighting and CCTV for approval.
- 8.4 In accordance with Local Plan Policy LLP25 and design principles set out within the NPPF, the Proposed Development has been carefully designed to provide a safe and secure environment for staff car parking in close proximity to the LDUH. It will also bring 2 no. plots of underutilised land back into active use.
- 8.5 Local Plan Policy LLP32 *Parking* states that parking provision at the Luton and Dunstable Hospital will be stringently controlled to ensure that on site provision is prioritised. The Proposed Development will provide staff car parking spaces for a temporary period of five years, to facilitate the implementation of the Hospital Car Parking and Access Strategy during the construction of the partial redevelopment of the LDUH and the construction of a new multi-level car park at Lewsey Road (current Application Ref. 20/00100/FUL).
- 8.6 The grant of planning permission for the change of use of land south of Dunstable Road will allow for existing staff car parking at the Hospital to be temporarily reallocated for visitor use during the redevelopment construction works. In accordance with the Hospital Car Parking and Access Strategy, this will ensure that an appropriate level of car parking is continually provided throughout the construction phases, minimising disruption and impacts on the local highways network including congestion.
- 8.7 The Proposed Development accords with relevant planning policies as set out in the Development Plan and the NPPF, and therefore planning permission should be granted without delay. In addition to the consideration of the application proposals in the light of their own merit, the Proposed Development also facilitates the proposed partial

redevelopment of the LDUH and Lewsey Road Car Park (current Application Ref. 20/00100/FUL) by ensuring adequate car parking provision at the Hospital over each phase of the construction process. This is a further consideration in favour of the application proposals, as it enables the delivery of significant improvements to community facilities and healthcare services in accordance with Local Plan Policy LLP24.

APPENDIX 1

Site Location Plan



Key

- Site boundary
- Other land owned by L&D NHS Trust
- L&D Buildings
- Main road to Dunstable
- Entrance Arrow

Key

Note:
All dimensions and areas are approximate.

Revision Schedule		
P1	Issue for Planning	07.02.20
P2	Boundary line updated	07.02.20

Site Location Plan

Dunstable Road Car Park

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TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
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