

Withington Community Hospital: Community Diagnostics Centre

**Manchester University Hospital NHS Foundation
Trust**

Planning Statement

July 2023

Turley

Contents

1.	Introduction	3
2.	Community Diagnostics Centres Programme	6
3.	Site and Surroundings	10
4.	Proposed Development	14
5.	Planning Policy Context	20
6.	Planning Appraisal	29
7.	Planning Balance and Conclusions	42

Olivia Carr
olivia.carr@turley.co.uk

Client

Manchester University NHS Foundation Trust

Our reference

MANM3015

July 2023

1. Introduction

1.1 This Planning Statement has been prepared by Turley on behalf of Manchester University NHS Foundation Trust, ('MFT' or 'the applicant'), in support of an application for full planning permission for a new Community Diagnostics Centre providing cardiorespiratory and endoscopy services at Withington Community Hospital ('WCH'), Manchester.

1.2 The description of development is as follows:

"Development of a two-storey building comprising a Community Diagnostics Centre (use class E(e)), with associated external landscaping, patient and delivery drop off area and 6 no. accessible parking spaces."

1.3 This Statement is intended to assist Manchester City Council ('MCC') (as the Local Planning Authority ('LPA')) and other stakeholders in understanding the Proposed Development Site ('PDS') and the proposed development, the prevailing planning policy framework and compliance of the proposal with it, and the weight to be applied to other material considerations.

Background

1.4 This proposal provides MFT the opportunity to expand and increase its capacity to deliver vital diagnostic services to south Manchester, providing greater patient-centred care and creating a reduction in health inequalities.

1.5 Withington has been identified as an appropriate location by the Manchester and Trafford CDC Programme, hosted by MFT, to locate a new Community Diagnostic Centre, facilitating two major services: cardiorespiratory and endoscopy care. The new CDC will support existing facilities provided at WCH and develop a more specialised care system for residents across South Manchester.

1.6 South Manchester is recognised as an area experiencing health discrepancies by the MFT. The Trust have identified that within Manchester and Trafford:

- Premature mortality, death before age 75, is significantly worse than England's average;
- Mortality rates are significantly worse than England's average for cancer, circulatory diseases, coronary heart disease, and respiratory disease; and
- A higher percentage of Black and Asian communities can be found within these areas in comparison to England's average. These communities are at a higher risk of developing certain health conditions which are historically underserved by healthcare facilities and are under-represented in cases of confirmed diagnosis.

- 1.7 The Trust aims to address these issues by locating their services in areas where needs are highest and most accessible. The Trust intends to deliver an integration between primary, secondary and community care through the adoption of a 'one-stop' approach.
- 1.8 Withington Community Hospital is a well-established facility in South Manchester, offering the community a range of non-acute outpatient and diagnostic services. Locating the CDC at Withington Community Hospital will integrate and streamline diagnostic pathways, enabling patients to receive appropriate treatment in an efficient time frame.

Pre-Application Consultation

- 1.9 The accompanying Statement of Community Engagement (SCE) provides a detailed overview of the pre-application public consultation and stakeholder engagement undertaken by MFT prior to the submission of this planning application. Below provides a summary of this engagement activity.

Manchester City Council

- 1.10 The proposals have been subject to discussions with planning officers at MCC and the project team. One formal pre-application meeting was held on 20 April 2023. This discussion focussed on the principle of development, the proposed design of the CDC, the programme of works and the proposed consultation strategy.
- 1.11 A meeting was also held on 11 May with MCC highways officers to agree the scope of the transport assessment and provide an overview of the proposals and the work completed to-date in relation to traffic and transportation.

Public Consultation and Stakeholder Consultation

- 1.12 Community consultation and engagement has been embedded into the delivery programme for the project, with a careful strategy worked up to ensure the local community and elected representatives can provide feedback to shape the final plans.
- 1.13 The public consultation on the proposed development ran between 24 May and 07 June 2023. The consultation comprised:
- In-person neighbour preview event on Wednesday 31 May
 - Live public webinar on Thursday 1 June 2023
- 1.14 The consultation was wide reaching and included engagement with hospital staff, elected members, and local residents. Most comments received were positive, with respondents generally supporting the proposed development.
- 1.15 The accompanying SCE provides a summary of the feedback received through the methods outlined above and provides consideration of the feedback by the Applicant and the project team prior to the submission of the planning application to MCC.

Accompanying Documents

- 1.16 This application comprises and is accompanied by the following documents:

- Application Forms and Certificates (Turley)
- Design and Access Statement (DAY Architectural Ltd.)
- Drawings for Approval (DAY Architectural Ltd.)
- Landscaping Scheme (Square Yard)
- Blue/ Green Infrastructure Strategy (Square Yard)
- Statement of Community Engagement (MFT)
- Travel Assessment (Curtins)
- Framework Travel Plan (Curtins)
- Ecological Appraisal (RSK BioCensus)
- Arboricultural Impact Assessment and Method Statement (RSK BioCensus)
- Heritage Assessment (Turley Heritage)
- Noise and Vibration Assessment (dBx Acoustic)
- Air Quality Assessment (Miller Goodall)
- Overheating Study/ Ventilation Strategy (Steven Hunts)
- Archaeological Desk-based Assessment (Salford Archaeology)
- Crime Impact Statement (GMP)
- Environmental Standards Statement (Ridge)
- BREEAM Pre-Assessment Report (Ridge)
- Flood Risk Assessment and Drainage Strategy (CSS)
- Ground Investigation Report (CSS)
- Construction Environmental Management Plan (MFT)
- Waste Management Strategy (MFT/ DAY Architectural Ltd./ Turley)
- Fire Strategy (OFR)

1.17 The remainder of the Statement is structured as follows:

- Section 2: provides an overview of the Community Diagnostics Centre Programme
- Section 3: describes the application site and its surroundings.
- Section 4: provides a detailed description of the proposal.
- Section 5: describes the planning policy context of the development.
- Section 6: provides an assessment of the proposals against the policy context outlined in Section 5.
- Section 7: presents overall conclusions and identifies why planning permission should be granted.

2. Community Diagnostics Centres Programme

National Community Diagnostics Centres Programme

- 2.1 In October 2021, the Government announced a £2.3 billion investment in the Community Diagnostic Centre (CDC) Programme across England, with the aim of delivering up to 160 CDC's by 2025¹.
- 2.2 The CDC programme is a result of the COVID-19 pandemic which continues to put unprecedented pressure on the NHS, subsequently leading to around 6 million people waiting for elective care in England (up from 4.4 million before the pandemic), which is only set to rise further.
- 2.3 The aim of the CDC programme is to²:
- **Reduce pressure** on acute hospitals.
 - **Increase the speed** in which patients can access tests and receive results - through easier, faster, and more direct access to the full range of diagnostic tests needed to understand patients' symptoms including breathlessness, cancer, ophthalmology.
 - **Reduce waiting times** by diverting patients away from hospitals, allowing them to treat urgent patients, while the community diagnostic centres focus on tackling the backlog.
 - **Increasing the choice** available to patients about where to receive treatment, including provision of care in the heart of their communities.
 - **Contribute to the NHS's net zero commitments** by providing multiple tests at one visit, reducing the number of patient journeys and helping to cut carbon emissions and air pollution
- 2.4 The programme also helps to increase the diagnostic capacity, which will in turn:
- Contribute to reducing health inequalities driven by unwarranted variation in referral, access, uptake, experience and outcomes of diagnostic provision.
 - Deliver a better and more personalised diagnostic experience for patients by providing a single point of access to a range of safe, quality diagnostic services in the community.
 - Support integration of care across primary, community and secondary care and the wider diagnostics transformation programme.

¹ [New diagnostic centres deliver nearly three-quarters of a million tests - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-diagnostic-centres-deliver-nearly-three-quarters-of-a-million-tests)

² <https://www.gov.uk/government/news/40-community-diagnostic-centres-launching-across-england>

- 2.5 The CDC Programme therefore presents an opportunity to deliver diagnostic services in the heart of the local community, providing more person-centred care, reducing health inequalities, and addressing unwarranted variation in care.
- 2.6 Withington Community Hospital was announced as being the location of one of the first 40 CDC across England, in October 2021.

Manchester and Trafford CDC Programme

- 2.7 Manchester and Trafford have a combined total population of around 800,000 (28% of the Greater Manchester total) and face a number of health challenges, including:

- More than 2/3 of neighbourhoods experience higher levels of deprivation than the average in England.
- Average life expectancy in England in 2017-19 (pre Covid-19 pandemic) was 79.8 years (male) and 83.4 years (female). In Manchester this was significantly worse at 76.4 years (male) and 80.3 years (female).
- The covid-19 mortality rate in Greater Manchester was significantly higher than the England average – for males this was 307.1 per 100k population in GM, compared to 233.1 per 100k population in England; and for females this was 195.2 per 100k population in GM, compared to England average of 142 per 100k population.
- Premature mortality (death before the age of 75) is significantly worse than the England average (363.4 per 100k population) in Manchester (431.4 per 100k population) and Trafford (431.4 per 100k population).
- Mortality rates in Manchester and Trafford are significantly worse than the England average for cancer, circulatory diseases, coronary heart disease, and respiratory disease.
- Barriers to accessing health and social care often result in patients presenting later and failing to engage with health promotion and disease prevention.
- Around 80% of neighbourhoods have a higher percentage of Black, Asian and people identifying with other ethnicities than the England average; some groups are at a higher risk of certain conditions, are historically underserved by healthcare services and are under-represented in terms of confirmed diagnoses.

- 2.8 Therefore, the Manchester and Trafford CDC Programme, hosted by MFT on behalf of the region, seeks to ensure that these much-needed diagnostic services are provided equitably across Manchester and Trafford, through the following five core principles:

- **Designing services** around the symptoms patients have rather than medical specialties.
- **Integration** across primary, community and secondary care.

- **Pathway redesign and innovation**, adopting a ‘one-stop’ approach wherever possible.
- **Delivering** services to people who need them the most.
- **Making services accessible** for those living more than a 30-minute public transport journey from the hub in areas of high deprivation.

2.9 The CDC programme for Manchester and Trafford is proposed as a ‘hub and spoke model’, with the CDC hub being located at Withington Community Hospital (WCH) in the south of the region, and a further ‘spoke’ location planned for North Manchester.

Withington Community Hospital CDC ‘Hub’

2.10 WCH is already recognised as an established community health facility in south Manchester, providing a range of non-acute outpatient and diagnostic services. The site is already fully integrated into the local health system with supporting digital infrastructure, which provides the support required for the delivery of the services.

2.11 Importantly, WCH already has imaging capabilities (MR, CT, X-Ray) through funding allocated as part of the national CDC programme. As such, WCH already provides cardiorespiratory and endoscopy services; albeit these services are very limited and located within spaces within the existing building that are not fit for purpose.

2.12 Therefore, it is proposed to locate specialist cardiorespiratory and endoscopy services within a dedicated building - the proposed CDC ‘hub’ - to integrate and streamline these important diagnostic pathways. This will enable more patients to start receiving appropriate treatment more quickly, within their community and within facilities that have been built for that purpose to provide the highest standard of care for patients. This would also enable qualitative improvements to other services within the existing WCH building and be organised in a more efficient way once the existing endoscopy and cardiorespiratory services are re-located into the new purpose-built CDC facility.

2.13 There are a number of significant benefits that would be realised through the delivery of the WCH CDC ‘hub’, as follows:

- Integrating and streamlining diagnostic pathways. By locating the cardiorespiratory services at WCH, this will enable patients to start receiving appropriate treatment more quickly with a positive impact on health outcomes.
- The endoscopy service will offer the dual purposes of a “hub” for screening and surveillance endoscopy for Manchester and Trafford, building on the unit’s existing role as a leading provider for the National Bowel Cancer Screening Programme (BCSP), and providing a dedicated diagnostic endoscopy site for the South and Central Manchester populations.
- This model will protect the capacity for screening and surveillance of the highest-risk populations, deliver the highest quality diagnostic endoscopy close to people’s homes, and release capacity at the specialised acute sites for complex and therapeutic procedures.

- The CDC will provide a Joint Advisory Group on Gastrointestinal Endoscopy (JAG) accreditable endoscopy unit at WCH.

2.14 The proposed CDC at WCH is of both local and national importance, which has been confirmed through funding from the Government. The new CDC would represent a significant £14.2 million investment in WCH to deliver vital diagnostic services in the heart of the community. The strategic importance of which for Manchester and Trafford cannot be understated.

3. Site and Surroundings

Strategic Location

- 3.1 The proposed CDC site is situated within a strategic location for health and medical facilities within South Manchester. Withington Community Hospital (WCH) is located approximately 7.2 km south of Manchester City Centre and 14km east of Trafford.
- 3.2 The site is also situated c. 5km to the south of the Corridor Manchester Enterprise Zone, which is an amalgamation of world-leading science and technology businesses, higher education institutions (University of Manchester and Manchester Metropolitan University), clinicians and world-leading NHS teaching Trusts.
- 3.3 WCH provides specialist care to patients requiring diagnostic treatment and day surgery and provides key services including Dermatology, Urology, Audiology, Ear Nose and Throat (ENT) and Therapies. WCH has one theatre and a large Outpatients Department.

Figure 3.1: Strategic Location of the Proposed Development



The Application Site

- 3.4 The PDS comprises an area of c.0.9 ha within the existing WCH estate. It is bound by Burton Road to the east Nell Lane to the north and Fielden Road to the south. Buccleuch Lodge Intermediate Care Unit is located to the south west and Elizabeth Slinger Road to the north west.

3.5 The PDS, located to the south of the existing hospital building and its associated carpark, comprises undeveloped scrubland - a cumulation of sapling / young trees, introduced shrubs and sealed surfaces.

3.6 Figure 3.2 shows an aerial view of the site.

Figure 3.2: Site Location Outlined in Red; Withington Community Hospital Estate outlined in Blue (Source: Google Earth)



3.7 The existing car park within the WCH estate, to the north of the PDS, provides for 440 no. car parking spaces. The 440 spaces are divided as follows:

- Western car park: 217 spaces (217 standard bays);
- Short stay car park: 71 spaces (41 standard bays and 30 disabled bays); and
- Southern car park: 152 spaces (145 standard bays, 5 electric vehicle (EV) charging bays for MFT transport and 2 public EV charging bays).

3.8 Access is gained to the main hospital site via a priority junction with Nell Lane, where there are parking barriers set back from the access junction. Immediately to the left of the car park entrance lies a short-stay car park/ drop-off area.

3.9 The car parking is operated through a payment system, whereby visitors receive a ticket upon entry to the car park from the barriers. Charges vary and can be found on

the WCH website³ – the first 30 minutes are free, up to 2 hours is £3.00, increasing by £1.00 every hour for up to 5 hours, for over 7 hours this would be £15.00. There are also options for weekly (£20.00) and monthly (£40.00) tickets. Frequent visitor concessions are also available.

Surroundings

- 3.10 The PDS is surrounded by residential development to the east and south along Burton Road and Fielden Road. These properties comprise two-storey terraced homes along Burton Road, and a series of three-storey properties along Fielden Road.
- 3.11 The Albert Park Conservation Area is located to the east of the PDS. The PDS is not located within the Conservation Area.

Figure 3.3: Conservation Area Boundary (Source: Manchester Local Development Framework Area Map)



Accessibility

- 3.12 The PDS is well located in relation to public transport. In particular, the site is located in proximity to a number of bus stops along Burton Road. The 111-bus route provides regular services into Piccadilly Gardens and the 172 service provides connections to Newton Heath. The 23-bus service into Stockport and the Trafford Centre can be accessed via a 4-minute walk to Barlow Moor Road, south of the site.
- 3.13 The Burton Road Metrolink Station is situated c.0.6km north of the site and creates connections to Rochdale Town Centre, Shaw and Crompton, and East Didsbury. These services run approximately every 6 minutes.

- 3.14 The surrounding highway network offers opportunities for cycling to facilitate access into the city centre and also outside of the centre including to Chorlton, Hulme, Rusholme and Levenshulme. Segregated facilities are available for cyclists along the entire length of Wilmslow Road, 0.9km from the PDS. The site is also located between Princess Road (A5103) and Palatine Road, which create two key arterial routes into Manchester City Centre.
- 3.15 Overall, the site is in a highly accessible location and accessible via a range of sustainable modes of transport.

Environmental Designations

- 3.16 There are no internationally designated sites (Ramsar, Special Areas of Conservation (SAC) or Special Protection Areas within 10km of the proposed site boundary⁴.
- 3.17 Based on the Environment Agency Flood Risk Map for Planning⁵, the site is within Flood Zone 1 meaning that the site has the lowest probability of flooding from rivers or seas.

Summary

- 3.18 The PDS is located within the site of WCH which is an established community health facility, providing specialist care to patients within the local community and surrounding areas. The PDS is located to the south of the existing hospital building and its associated carpark and is currently unoccupied, comprising scrubland.
- 3.19 The PDS is located within a primarily residential area which has access to a range of sustainable transport, including regular bus and the Metrolink services. Overall, the PDS is located within a highly sustainable location within the wider estate of an existing health facility.

⁴ [DEFRA | Magic Maps](#)

⁵ [Environment Agency | Flood Map for Planning](#)

4. Proposed Development

4.1 This section provides a summary of the proposed development and should be read alongside the submitted plans and Design and Access Statement ('DAS'), prepared by DAY Architectural Ltd.

4.2 The description of development is as follows:

"Development of a two-storey building comprising a Community Diagnostics Centre (use class E(e)), with associated external landscaping, patient and delivery drop off area and 6 no. accessible parking spaces."

4.3 The key aspects of the scheme are described below.

The Proposed Development

Layout

4.4 The proposed site layout is shown on the proposed layout plan⁶ with an extract of this provided at **Figure 4.1**. This shows the location of the proposed CDC hub to the south of the existing WCH building, comprising a single building physically separated from the existing hospital building.

4.5 The proposed building is rectangular in shape and is set back from Burton Road to the east and Fielden Road to the south to allow for the retention of all mature trees along these boundaries.

4.6 The main entrance to the building is located on the western elevation, accessed from within the WCH site from the existing main car park. This ensures privacy and dignity for patients utilising the facility.

4.7 To the south of the main entrance of the proposed building is a landscaped plaza style area which incorporates six no. accessible parking bays accessed from the main WCH car park, walkways and seating areas, creating a pleasant environment for patients, visitors and staff utilising the facility.

4.8 Three existing parking spaces within the existing car park, to the north west of the proposed building, are also proposed to be converted into 'drop-off' bays for visitors and patients to the facility. These parking spaces will be converted through the use of clear markings which identify these as 'drop-off' bays.

4.9 10 no. cycle parking spaces are located to the south east of the main entrance. These are available for use by both staff, patients and visitors to the facility and are proposed in addition to the existing cycle parking facilities at WCH.

⁶ Drawing no. 040005 Rev P6

Figure 4.1: Extract of Proposed Site Plan (drawing no. 040005 Rev P7).



Use and Amount of Development

4.10 The proposed development has been developed in conjunction with key stakeholders including, the Cardiology and Endoscopy clinical teams, Infection Prevention Control, Health and Safety and Estates and Capital teams, all at WCH. As such, the proposed development meets the needs of both patients and staff and importantly ensures that patients receive the highest quality of care.

4.11 **Table 4.1** provides an overview of the use and amount of development on each floor of the proposed building. The overall Gross Internal Floor Area of the proposed development is 2,049m².

Table 4.1: Proposed Areas of Development

Proposed Areas	GIFA (m ²)	Facilities
Ground Floor		
Endoscopy Department (inc. circulation)	1024	2 no. Consultation / examination rooms (1 male / 1 female) 3 no. preparation rooms 4 no. changing rooms (2 male / 2 female) 2 no. procedure rooms 2 no. recovery areas (1 male / 1 female)

Proposed Areas	GIFA (m ²)	Facilities
		Staff areas including reception, managers office, pantries, changing areas, cleaning areas
First Floor		
Cardiorespiratory Department (inc. circulation)	1025	2 no. lung function rooms 2 no. consultation rooms 2 no. ECO rooms 2 no. ECG rooms Staff areas including office, reception and administration room Plant room
Roof		
-	n/a	Plant, including air source heat pumps and chillers Photovoltaic solar panels

Architecture and Built Form

- 4.12 The proposed development comprises of a single building of two storeys plus plant at roof level, with a maximum height of 10.5 which is 3.5m lower than the existing WCH which has a maximum height of 14m.
- 4.13 The new building incorporates the following key design considerations:
- Materiality:** the use of brick forms and areas of relief have been incorporated to tie into the existing materiality. Larger window reveals have been used to create privacy between the building and its surroundings. Red brick is very prominent within the surrounding area and therefore forms the primary material within the material palette of the proposed building. The material composition also includes lighter coloured brick, anodised aluminium cladding and curtain walling to add variation and visual interest to the building.
 - Key Frontage:** The large expanse of glazing to the main entrance, helps to create a visually pleasing feature which signifies this as the main access point to staff, patients and visitors, whilst also providing maximum light to the interior creating a pleasant internal environment. This also creates views out onto the landscaped area.
 - Detail:** projecting shrouds and brick detailing are proposed throughout the design to create a sense of unity, consistency and visual interest.
 - Separation and Screening:** the design of the proposed building ensures appropriate separation from the adjacent hospital building and surrounding residential properties. The requirement for a separate building is due to the sensitive nature of the services being provided. The proposed building is sufficiently set back from both Burton Road and Fielden Road. Indeed, it is set further back from Burton Road than the existing WCH building. In addition, all

mature trees along these boundaries will be retained to maintain the natural screen to the facility from surrounding properties.

- **Consistency:** the proposed building has been designed to complement the existing rhythm and massing of the existing WCH building. This includes the provision of a flat roof, which also enables photovoltaic solar panels to be installed.

- 4.14 The use of the above design features ensures that the CDC hub is of a high design quality and respects and complements the character of the surrounding area, including the existing adjacent WCH building.

Figure 4.2: Visual of the proposed CDC Hub main entrance (western elevation).



Parking and Accessibility

- 4.15 Vehicular access into the site will be via the existing main car parking area servicing WCH. Parking spaces will be incorporated within the proposed development through the provision of six parking spaces, all of which are to be accessible.
- 4.16 The existing car park currently provides 440 parking spaces at the site (403 standard bays, 30 disabled bays, 5 electric vehicle bays for MFT transport and 2 public charging bays).
- 4.17 It is proposed that three of the existing parking spaces within the car park will be converted into drop-off bays for visitors to the proposed development. In addition, the existing service / waste compound to the south west of the existing WCH building will be extended, requiring the loss of two existing car parking spaces. As such, there will be a loss of five no. parking spaces within the existing car park as a result of the proposed development. Further details of this are discussed within the accompanying Transport Statement, prepared by Curtins.

- 4.18 Cycle parking is also proposed to the south east of the main entrance in the form of 10 no. long-stay cycle spaces (secured and sheltered) for staff, patient and visitor usage.

Landscape

- 4.19 A comprehensive landscape scheme is proposed to enhance the environment around the proposed CDC hub providing a net gain in biodiversity and create a greener setting. This includes the following features:

- Plaza style entrance comprising of block paving, including seating areas for staff, patients and visitors set within landscape areas comprising amenity shrub and tree planting.
- Pedestrian footpaths comprising of block paving, with seating areas provided along the main footpath to / from Burton Road set within amenity shrub and tree planting.
- Retention of scrub habitat to the south and west separated from the building and hard landscaped area by a mixed native hedgerow.
- Retention of mature boundary trees to provide screening from surrounding properties.

Waste Strategy

- 4.20 A Waste Strategy has been prepared by Day Architectural Ltd and accompanies this planning application. This confirms that MFT implements the waste hierarchy to deal with all waste generated on-site and is managed through the Trust's waste management policy (WM5) and associated Standard Operating Procedures.
- 4.21 Any waste that cannot be prevented is appropriately segregated by clinical and non-clinical staff. Once segregated, waste is transferred to large wheelie bins or other suitable containment from the point of production, to the waste disposal compound located to the north east of the existing WCH building. Waste is transferred by portering and / or domestic staff.
- 4.22 The proposed development would require the following:
- 3 no. 1100 litre general domestic wheelie bins
 - 2 no. 1100 litre cardboard wheelie bins
 - 2 no. 770 litre clinical waste bins
- 4.23 As a result of the above, the existing waste compound is required to be extended. This will be achieved through extending the existing 2m timber fencing around the compound to enclose an additional area to the south which currently comprises part of the internal road network around the car park. No other works are required to enable the extension of the waste compound, as such the erection of the 2m timber fencing comprises permitted development in accordance with Schedule 2, Part 2, Class A of The Town and Country Planning (General Permitted Development Order) (England)

Order 2015 (as amended). Therefore, the extension to the waste compound is not required to be included within the redline boundary of the proposed development.

- 4.24 Access to the waste compound will be as per the existing access to the west from within the car park. Access gates are also provided to the 'extension' to the south. It is envisaged that only smaller vehicles would access the compound from this direction; however, larger refuse vehicles could also access the compound from the south should this be necessary. Further detail on this is provided with in the Transport Statement prepared by Curtins.

Sustainability

- 4.25 The proposed development sets high sustainability standards, which are set out in the Environmental Standards Statement (ESS) which accompanies this planning application.
- 4.26 The ESS confirms that the proposed development will incorporate a range of measures to reduce carbon emissions, mitigate the effects of climate change, and to ensure the long-term resilience of the development to the effects of climate change.
- 4.27 These measures include:
- Targeting a BREEAM 'Excellent' rating to align with the NHS sustainability brief and a minimum of BREEAM 'Very Good'.
 - Optimising the thermal performance of the building envelope beyond the minimum U value and air infiltration standards set out in Part L Volume 1 of the Building Regulations.
 - Key proposed energy efficient building services systems include the use of heat pumps, LED lighting installations, and low energy mechanical ventilation systems.
 - Installation of an array of approximately 36Kwp of roof mounted photovoltaic solar panels.
- 4.28 As a result of the above measures, analysis undertaken in relation to carbon reduction predicts the proposed development to have an average regulated CO₂ emission rate of 3.09 kgCO₂/m²/per annum. This represents a 34% carbon reduction compared to the Part L2: 2021 Target emission rate, this exceeds the requirements of Core Strategy policy EN6 'Target Framework for CO₂ reductions from low or zero carbon energy supplies' which requires a betterment of 15% on Part L 2010.

5. Planning Policy Context

5.1 Section 70(2) of the Town and Country Planning Act 1990 (TCPA) and Section 38(6) of the Planning and Compulsory Purchase Act (PCPA) requires that planning decisions be taken in accordance with the adopted Development Plan unless material considerations indicate otherwise.

5.2 The adopted Development Plan comprises:

- The Manchester Core Strategy (2012)
- Manchester Proposals Map
- Saved policies of the Manchester Unitary Development Plan (UDP) (1995)
- Greater Manchester Waste Development Plan (April 2012)
- Greater Manchester Minerals Plan (April 2013)

5.3 Other material considerations include:

- The National Planning Policy Framework ('NPPF') (July 2021)
- Guide to Development in Manchester Supplementary Planning Document (2007)
- Our People, Our Place – The Greater Manchester Strategy (2016)
- Our Manchester Industrial Strategy: Developing a more inclusive economy (2019)
- The Greater Manchester 2040 Transport Strategy (February 2017)
- Manchester Climate Change Framework (2020 – 2025)
- Delivering a 'Net Zero' National Health Service (October 2020)
- The NHS Long Term Plan (January 2019)
- Powering Recovery: Manchester's Recovery and Investment Plan (November 2020)
- The emerging Manchester Local Plan Review
- Emerging Places for Everyone Plan for Greater Manchester (August 2021 Publication Draft)

5.4 The Core Strategy references and aligns with the NPPF's 'presumption in favour of sustainable development'⁷. This means that planning applications that accord with the policies in the Development Plan should be approved without delay, unless material considerations indicate otherwise.

5.5 Key themes and requirements of relevant Development Plan documents and other material considerations are summarised below.

The Importance of Health

5.6 The Core Strategy (CS) sets out⁸ a vision that by 2027, Manchester will be *"a City with an increased and sustainable healthy population and a community which both benefits from and drives the City's productivity upwards"*.

⁷

HM Government (2021), National Planning Policy Framework, para. 11.

⁸

Core Strategy (2012), para 4.14.1

- 5.7 Policy SP1 ‘Spatial Principles’ of the CS outlines that development should deliver positive contributions of health, safety and wellbeing to residents within neighbourhoods of choice.
- 5.8 This vision and spatial principle align with the NPPF, which advises that planning decisions should aim to achieve healthy, inclusive and safe places⁹. The NPPF goes on to state that to provide necessary facilities within communities, planning decisions should support the delivery of local strategies to improve health and well-being for all sections of the community¹⁰.
- 5.9 The Our Manchester Industrial Strategy also identifies that opportunities to improve health through regeneration should be capitalised on to drive economic and community renewal, alongside the transformation and integration of health services.
- 5.10 Policy JP-P 6 of the draft Places for Everyone Plan (‘Pfe’) places emphasis on tackling health inequalities through provisions of positive health facilities and the continued enhancement and operation of hospitals across Manchester. The draft submission document notes that health life expectancy is currently 3-4 years below the national average for men and women, and that prevalent issues include cardiovascular and respiratory diseases.
- 5.11 In support of the above, the NPPF advises that Local Planning Authorities should support proposals that make more effective use of sites for community uses, such as hospitals, provided this maintains or improves the quality of service provision and access to open space¹¹

Promoting Economic Growth in Manchester

- 5.12 The PDS is located within South Manchester. In accordance with the Core Strategy, high technology industry and research development in South Manchester will be supported. Policy EC9 ‘South Manchester’ notes that development proposals should have regard to ensuring the efficient use of existing employment spaces.
- 5.13 The CS recognises that South Manchester is a largely residential area and home to approximately one third of Manchester’s population¹². It goes on to explain that this area provides a significant workforce for the City, within easy commuting of the City Centre. The CS highlights that South Manchester is a ‘neighbourhood of choice’, which is popular with families and skilled workers. It therefore attracts and retains a significant number of higher income groups that are critical to sustaining Manchester’s economic growth.
- 5.14 The CS explicitly recognises that the City Region’s key economic assets include *“world class universities, knowledge economy...a cluster of hospitals ... a high representation of the growth sectors, good road accessibility and access to a skilled labour force”*¹³.

⁹ HM Government (2021), National Planning Policy Framework, para. 92

¹⁰ HM Government (2021), National Planning Policy Framework, para. 93

¹¹ HM Government (2021), National Planning Policy Framework, para. 123

¹² Paragraph 2.67, Manchester Core Strategy

¹³ Paragraph 8.3, Manchester Core Strategy

Developing these significant economic assets will be crucial to achieving the vision for Manchester to be a global city. Manchester's aspiration to become a global city is set out in numerous key policy documents including the Core Strategy and the Greater Manchester Strategy. In addition, the draft PfE places great weight on the continued economic growth of the city centre in delivering Greater Manchester's ambition of becoming a top global city.

- 5.15 Further to this, the draft PfE acknowledges that in order for Greater Manchester to 'flourish' it will need to make the most of its key assets and advantages to help differentiate it from other places. Draft policy JP-J 1 supports long term economic growth across all boroughs through the facilitation of high value clusters in prime sectors such as health innovation.
- 5.16 The aspiration for Manchester to build upon its already significant international profile and be amongst the leading cities of the world is entirely consistent with the NPPF and the Levelling Up agenda. The NPPF advises that significant weight should be placed on the need to support economic growth and productivity¹⁴.

Enhancing Existing Facilities

- 5.17 Policy EC9 of the CS, notes that employment and economic development provision in South Manchester will be within existing employment locations and centres, such as Withington, suitable for mixed use development providing local needs and services.
- 5.18 Within these areas, development proposals should ensure efficient use of existing employment space and seek to improve public transport, walking and cycling connectivity between residential neighbourhoods and employment locations.
- 5.19 CS Policy EC2 identifies that where there is existing employment space, such as Withington Community Hospital, the Council have expressed their support for enhancing these sites.
- 5.20 The NPPF also states that planning decisions should help create the conditions in which businesses can invest, expand and adapt¹⁵; enabling each area to build on its strengths and address any challenges of the future. The NPPF also confirms that planning decisions should recognise and address the specific locational requirements of different sectors¹⁶.

Promoting Sustainability and a Low Carbon Future

- 5.21 One of the fundamental aims of the CDC programme is to contribute to the NHS's net zero ambitions through providing facilities within communities and allowing for multiple tests at one visit; therefore, reducing the number of patient journeys and helping to cut carbon emissions and air pollution.

¹⁴ HM Government (2021), National Planning Policy Framework, para. 81

¹⁵ HM Government (2021), National Planning Policy Framework, para. 81

¹⁶ HM Government (2021), National Planning Policy Framework, para. 83

- 5.22 Paragraph 149 of the NPPF supports the transition to a low carbon future in a changing climate. In particular, the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions.
- 5.23 Our People, Our Place - The Greater Manchester Strategy emphasises the need to strengthen the natural environment across Greater Manchester and to tackle climate change (paragraph 9.2). This has informed a 5-Year Environment Plan for Greater Manchester which sets a clear vision for Greater Manchester to be *“a clean, carbon neutral, climate resilient city-region, with a thriving natural environmental and circular, zero-waste economy...”* (page 16).
- 5.24 There is a clear ambition for Greater Manchester to be carbon neutral by 2038 and to meet carbon budgets that comply with international commitments. Alongside, this there is a drive to improve air quality, meeting guidelines on air quality by 2030 and supporting the UK Government in meeting and maintaining all thresholds for air pollutants.
- 5.25 Our Manchester – The Manchester Strategy sets out Manchester’s ambition to create a low carbon city and it encourages the growth of a low carbon culture (pages 47-53). It has also declared a climate emergency (July 2019) and set itself the aim of making Manchester a zero carbon by 2038 or before.
- 5.26 This strategy will build-on the climate changes policies in the Manchester Core Strategy (policies EN4, EN6 and EN8), but there is a recognition that more needs to be done. The City Council has now adopted the Manchester Climate Change Framework 2020-25 as the city’s high-level strategy for tackling climate change. It sets out how Manchester will “play its full part in limiting the impacts of climate change”. A key objective of the framework is ensuring new developments in the city are built and operated to zero carbon standard as soon as possible (page 24).
- 5.27 In October 2020, the NHS released their commitment to ‘Delivering a Net Zero National Health Service’. This includes two targets for the NHS net zero commitment, as follows:
- Net zero by 2040 for the emissions the NHS controls directly.
 - Net zero by 2045 for the emissions the NHS has the ability to influence.
- 5.28 Since this commitment, on 01 July 2022, the NHS became the first health system to embed net zero into legislation, through the Health and Care Act 2022. The ‘Delivering a Net Zero National Health Service’ report now has the status of ‘statutory guidance’.
- 5.29 The report also includes a number of steps to be taken to achieve these targets, including developing a framework to evaluate carbon reduction associated with new models of care being considered and implemented as part of the NHS Long Term Plan.
- 5.30 This commitment from the NHS to the contribution to net zero carbon is clear. MFT have also set out a ‘Sustainable Development Management Plan’ which sets out the vision, strategy and objectives for delivering sustainable healthcare across the city of Manchester, Trafford and beyond. It sets a five-year carbon budget with the aim for a 33% reduction in carbon emissions by 2023 / 24.

Promote Sustainable and Green Transport Options

- 5.31 Paragraph 104 of the NPPF is clear that transport issues should be considered at the outset of development proposals to ensure potential impacts are addressed, but also to identify opportunities to promote walking, cycling and public transport use, as well as the adoption of new technology.
- 5.32 Core Strategy Policies T1 and T2 require new development to improve pedestrian routes and be easily accessible by walking, cycling and public transport. The NPPF generally echoes this policy position while stating that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development would be 'severe'.
- 5.33 The Greater Manchester 2040 Transport Strategy sets out the ambition to develop a high quality, fully integrated transport system for Greater Manchester, with travelling customers at its heart and states:
- "Integration with spatial planning is critical in influencing people's travel choices. Fundamentally, the transport network needs to connect the places people live with the places where they work, study, play, shop, visit, and access public services like healthcare. The location of housing close to facilities and public transport tends to reduce the levels of car use."* (page 18)
- 5.34 A key ambition of the city-region, as outlined in the Greater Manchester 2040 Transport Strategy, is also to reduce congestion and the environmental impact of road travel. Supporting carbon targets and to improvements to air quality. As part of this, there is support for putting in the infrastructure that will enable more people to take active lives and to walk or cycle.
- 5.35 The Delivering a Net Zero NHS report outlines a number of interventions relating to travel and transport to achieve their net zero commitments. This includes measures such as incentivising staff to use electric vehicles, with increased access to these and ensure all NHS Trusts have a Green Travel Plan to encourage a shift away from cars towards cycling, walking and public transport.
- 5.36 This report uses the Manchester University NHS Foundation Trust as an example that has successfully implemented a sustainable travel plan providing personal travel advice for staff and updated travel information, with over 200 additional cycle parking spaces and two cycle hubs for staff (including storage, lockers and showers).
- 5.37 Sustainable connectivity and transport is one of the key priorities for MFT, with the Trust specifically aiming to encourage sustainable and active travel wherever possible, including the following principles:
- Create a comprehensive Green Travel Plan.
 - Provide end of journey provision for active travel, runners and cyclists (showers, dry lockers etc.).
 - Provide infrastructure for Electric Vehicles.

Achieving Well Designed Places

- 5.38 Crucial to securing economic development is creating well designed places that enable employers to attract and retain the best and most highly skilled professionals.
- 5.39 The NPPF¹⁷ provides significant commentary and guidance on the importance of creating well-designed places. The importance of promoting public safety through planning and for buildings to be engaging at ground floor level to create a pedestrian friendly environment and sustainable community is highlighted. The importance of making efficient use of space on a site and ensuring all proposals are visually attractive and sympathetic to local character is also identified to be a key consideration. All developments are to establish or maintain a strong sense of place that contributes to creating welcoming, distinctive and vibrant places to live and work.
- 5.40 The NPPF confirms that *“the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve”*, and *“good design is a key aspect of sustainable development”*¹⁸. In terms of decision making, the NPPF guides LPA’s to approve, where possible, proposals for sustainable developments¹⁹
- 5.41 The objective to achieve well-designed places is also reflected in local planning policies. In particular, Policy SP1 of the Core Strategy seeks to ensure that all new development across the City:
- Makes a positive contribution to creating neighbourhoods of choice including:
 - Creating well-designed places that enhance or create character
 - Making a positive contribution to health, safety and wellbeing of residents
 - Considering the needs of all members of the community, and
 - Protecting and enhancing the built and natural environment.
 - Minimises emissions, ensures efficient use of natural resources and reuses previously developed land wherever possible, and
 - Improves access to jobs, services, education and open space by being located to reduce the need to travel and providing good access to sustainable transport provision.
- 5.42 Furthermore, all new development in Manchester is required to follow seven principles of urban design in accordance with Policy EN1, as follows:
- Character: a place with its own identity

¹⁷ HM Government (2021), National Planning Policy Framework, para 126

¹⁸ HM Government (2021), National Planning Policy Framework, para. 126

¹⁹ HM Government (2021), National Planning Policy Framework, para. 38

- Continuity and enclosure: a place where public and private places are clearly distinguished
- Quality of the public realm: a place with attractive and successful outdoor areas
- Ease of movement: a place that is easy to get to and move through
- Legibility: a place that has a clear image and is easy to understand
- Adaptability: a place that can change easily, and
- Diversity: a place with variety and choice.

5.43 Spatial Policies SP1, EC1 and C1 within the Core Strategy and the Guide to Development in Manchester Strategic SPD confirm that to achieve a positive contribution to neighbourhoods, developments should enhance or create character, a sense of place and minimise detrimental impacts on adjacent uses. Proposals should be designed in a way that makes best possible use and efficient use of space available.

Addressing Other Environmental and Technical Matters

5.44 For ease of reference, a summary of the key sustainability, environmental and technical policies from the adopted Development Plan and the NPPF are summarised below:

- **Development Management and Design** - Core Strategy Policy DM1 outlines key development management matters, to which all developments should demonstrate consideration as part of any planning application. The relevant matters include layout, scale, materials and appearance of the proposed development and effects on amenity, noise and traffic generation. Consideration must be given to safety and crime prevention, refuse storage and collection, flood risk and drainage and any biodiversity effects. Reference is made to the Guide to Development in Manchester SPD (April 2017) which recognises the importance of design in delivering sustainable development across the City and provides developers more detailed design related guidance.

The NPPF recognises the importance of design and confirms that development should be visually attractive, sympathetic to local character, establish a strong sense of place and optimise the potential of the site, whilst creating places that are safe, inclusive and accessible, and which promote health and well-being²⁰.

- **Access and Transportation** - CS Policies T1 and T2 seek to support proposals that improve choice by developing alternatives to the car, improving pedestrian routes and the pedestrian environment and facilitating modes of transport that reduce carbon emissions. All new developments should be easily accessible to good public transport links to the city centre and Regional Centre.

The NPPF supports this position whilst noting that development should only be refused on transport grounds where the cumulative impacts of the development would be 'severe' (paragraph 111).

- **Heritage** - To ensure that development maximises the city's distinctive historic environment, Policy EN 3 (Heritage) requires new developments to be designed to support the Council in preserving, or where possible enhancing the historic environment, the character, setting and accessibility of areas and buildings of acknowledged importance.

The NPPF confirms that Local Planning Authorities should take account of a number of criteria when determining planning applications, including *"the desirability of new development making a positive contribution to local character and distinctiveness."*²¹

- **Air Quality**- The Core Strategy Policy EN16 instructs that development proposals include measures to minimise and mitigate the local impact of emissions from traffic generated by the development, as well as emissions created by the use of the development itself.

Paragraph 174 of the NPPF also requires that proposals must prevent contributing to or be adversely affected by unacceptable levels of pollution, including air pollution

- **Biodiversity**- The Core Strategy Policy EN15 and EN9 and the NPPF²² make clear that proposals must aim to conserve and enhance biodiversity and encourage opportunities to incorporate biodiversity in and around developments and integrate proposals with local habitats.
- **Climate Change**- The Core Strategy Policies EN4 and EN8 seek to mitigate the impact of climate change and adapt to its effects on the local environment, particularly by reducing CO2 emissions.

Paragraph 157 of the NPPF echoes this policy objective and expects new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- **Flood Risk and Drainage** - CS Policies EN4 and EN14 include reference to flood risk and new development. These policies and the NPPF require that proposals should be directed away from areas which are at the greatest risk of flooding; and where development is permitted, local planning authorities should ensure flood risk is not increased elsewhere (paragraph 159). CS Policy EN17 also requires developers to avoid any adverse impact on water quality, including during the construction phase.

²¹ HM Government (2021), National Planning Policy Framework, para. 190

²² HM Government (2021), National Planning Policy, para 174

- **Ground Conditions** - CS Policy EN18 requires developers to consider the potential risks from ground conditions and, if necessary, incorporate mitigation measures to address them.

The NPPF is clear that planning decisions should ensure that sites are suitable for its new use taking account of ground conditions, land instability, and any proposals for remediation (paragraph 183).

- **Energy** - The Core Strategy Policies EN6 and EN8 require developments to be adaptable to climate change. For developments over 1,000sqm application submissions should demonstrate through the provision of an Energy Statement how proposals meet CO2 emission reduction targets.
- **Waste** - CS Policies EN19 and DM1 promote sustainable forms of waste management. The CS recognises that waste management is a key issue for the City and requires developers to submit a waste management plan to demonstrate how both construction and demolition waste will be minimised and recycled on-site wherever possible.

Summary: Key Policy Issues for Evaluation

- 5.45 National planning policy sets out a presumption in favour of sustainable development, which confirms that development that accords with relevant policies in an up-to-date development plan should be granted planning permission without delay.
- 5.46 There is policy support at both a national and local level for estate regeneration and proposals that seek to improve accessibility to health facilities and services and support economic growth. Manchester based strategies seek to support growth and regeneration ambitions of existing health-based institutions to ensure the best quality of care is provided.
- 5.47 The following chapter will assess the proposed CDC scheme against the key policy issues that have been identified in this chapter:
- Strategic case underpinning this planning application
 - Sustainability Considerations
 - Design Considerations
 - Other Environmental Considerations

6. Planning Appraisal

Principle of Development

The Strategic Case Underpinning the Proposals

- 6.1 The proposed development is fundamental to achieving the aims of the national Community Diagnostics Centre (CDC) programme proposed by the Government which has received £2.3 billion investment across England. These aims include contributing to reducing health inequalities and delivering improved diagnostic pathways to ensure patients are receiving care as quickly as possible.
- 6.2 The CDC programme for Manchester and Trafford is proposed as a 'hub and spoke model', with the CDC hub being located at Withington Community Hospital (WCH) in the south of the region, and a further 'spoke' location planned for North Manchester.
- 6.3 As identified in Section 2 of this Statement, Manchester and Trafford currently face numerous health challenges, with more than two thirds of neighbourhoods experiencing higher levels of deprivation than the average in England. In addition, there are barriers to accessing health and social care within these areas, which result in patients presenting later and failing to engage with health promotion and disease prevention.
- 6.4 Through receipt of an initial round of funding from the CDC programme, WCH were able to expand the imaging capabilities of the existing hospital and subsequently offer cardiorespiratory and endoscopy services. However, due to the constrained space within the existing WCH building, these services are currently very limited and located within spaces that are not fit for purpose.
- 6.5 The CDC hub at WCH would represent a significant £14.2 million investment to deliver a dedicated building for these specialist services. This will enable more patients to start receiving appropriate treatment more quickly, within their community and within facilities that have been built for that purpose to provide the highest standard of care. This would also enable other services within the existing WCH building to be organised efficiently with qualitative improvements in service-delivery once the existing endoscopy and cardiorespiratory services are re-located into the new purpose-built CDC facility.
- 6.6 Ultimately, this significant investment at WCH will ensure that these much-needed diagnostic services are provided equitably across Manchester and Trafford helping to meet the aims of the national CDC programme.
- 6.7 The proposed development is clearly in accordance with the Core Strategy's vision that by 2027, Manchester will be a City with an increased and sustainably healthy population. This is further supported by the Our Manchester Industrial Strategy which seeks to ensure that opportunities to improve health through regeneration are taken to drive economic and community renewal.
- 6.8 In addition, the Core Strategy recognises that within South Manchester, employment and economic development provision will be within existing employment locations

which are suitable for development that provides local needs and services. The Council have expressed their support for enhancing such sites through CS Policy EC2. The NPPF also outlines that proposals that make more effective use of sites for community uses, such as hospitals, should be supported provided this maintains or improves the quality-of-service provision.

- 6.9 It is therefore clear that the support for the proposed development at a local, regional and national level is substantial, as demonstrated throughout this Statement.
- 6.10 In light of this, the principle of the proposed development at WCH is fully aligned with and entirely supportive of the vision for Manchester and the wider city region to be a City with an increased and sustainable healthy population, as set out in the Development Plan and the aforementioned strategic policy and evidence base documents.
- 6.11 The contribution which the proposed development would make to addressing health inequalities, delivering higher standards of care and, ultimately enhancing health-outcomes and life expectancy for patients within South Manchester and Trafford should be afforded significant weight in the planning balance.

Sustainability Considerations

- 6.12 An Environmental Standards Statement (ESS) has been prepared by Ridge to demonstrate the range of positive measures incorporated into the scheme to meet local and national sustainability planning policy and contribute to Manchester's and the NHS's net zero carbon ambition.
- 6.13 The energy strategy of the building has been designed in accordance with the energy hierarchy which seeks the incorporation of advanced building modelling and passive construction techniques, high efficiency systems, and renewable and low carbon energy sources where possible. A BREEAM preassessment has been undertaken which indicates that the development will achieve a BREEAM Excellent certification.
- 6.14 The proposed development also includes a number measures outlined in paragraphs 4.25 – 4.28 of this Statement, such as the installation of an array of approximately 36Kwp of roof mounted photovoltaic solar panels, that will achieve a 34% carbon reduction when compared to the Part L2: 2021 Target emission rate, exceeding the requirements of CS Policy EN6 by 19%.
- 6.15 The development also aims to reduce embodied carbon where possible, through incorporating low carbon, locally sourced alternatives as well as using low carbon construction techniques where appropriate.

Sustainable Transport

- 6.16 Recognising that sustainable transport is a key objective in Manchester's net zero carbon goal, the proposed development encourages those who wish to use sustainable and low carbon forms of transport. This includes the provision of six no. EV charging spaces and 10 no. secure and sheltered cycle parking spaces.

- 6.17 In addition, the Trust have implemented a Travel Plan (January 2023)²³ to align with the Trust's Healthy Travel Strategy which aims to minimise the number of car trips generated by WCH and encourage staff, patients and visitors to use sustainable modes of transport, where possible.
- 6.18 With the aim of changing the travel behaviours to and from WCH of both staff and patients / visitors, an Action Plan has been identified which includes a number of short, medium and long-term measures that will be implemented, as follows:
- Short term:
 - Continue the cycle repair / maintenance programme for staff.
 - Consider funding opportunities to increase the number of EV charging points.
 - Launch of the corporate Travel Plan framework and identification of an 'active travel champion' within the workplace to coordinate promotional activities and schemes.
 - Refresh and update travel information to continue to promote active and sustainable travel to staff and patients.
 - Medium term:
 - Support the newly implemented zero carbon salary sacrifice car leasing options for staff.
 - Explore the potential for a car club to operate from the site, for staff.
 - Consider including links to sustainable travel information on patient appointment letters.
 - Long term:
 - Work with TfGM and MCC to support the development of routes surrounding the site to develop connections to existing cycle routes.
- 6.19 Through the implementation of the above measures and the continued monitoring and review of the Travel Plan, this supports the commitment to sustainable travel and helps towards achieving zero carbon by providing staff and visitors with improved facilities to support sustainable travel.

Summary of Sustainability Considerations

- 6.20 The Delivering a Net Zero National Health Service together demonstrate MFT's commitment to support the city's goal to be net zero carbon by 2038. The summary above and the ESS demonstrate how the proposed development supports the commitments of the NHS.
- 6.21 In sum, it is considered that the proposed development contributes positively to the sustainability, energy and climate objectives of MCC and the NHS, including their net carbon ambition. The ESS concludes that the proposed development has maximised the opportunities for sustainable improvement and decarbonisation on the site compared to and within the constraints of the existing development and proposed end use.

- 6.22 The proposed development is therefore in accordance with CS policies EN4, EN6, EN8, T1 and T2, the Guide to Development in Manchester SPD, paragraphs 152 – 158 of the NPPF and the associated strategies noted in section 5 of this Statement.

Design Considerations

- 6.23 The NPPF explains that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. 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.
- 6.24 A Design and Access Statement (DAS) accompanies this planning application and describes in detail the design of the proposed CDC facility and how this has evolved to respond positively to its surroundings, including the existing WCH and how it will be arranged internally and externally.
- 6.25 This Statement and the DAS also describe how the siting, design and layout of the proposed development has been developed in conjunction with key stakeholders including, the Cardiology and Endoscopy clinical teams, Infection Prevention Control, Health and Safety and Estates and Capital teams, all at WCH. This exercise has been important in ensuring the proposed development meets the needs of both patients and staff and importantly ensures that patients receive the highest quality of care.

Siting and Layout

- 6.26 The CDC hub is proposed to be located on a currently unused part of the WCH site which has been left unmanaged for a number of years and lies directly adjacent to the existing WCH building.
- 6.27 The proposed development is set back from Burton Road to the east and Fielden Road to the south to allow for the retention of all mature trees along these boundaries, maintaining the natural screening they provide. In addition, the proposed building is set back from the building line of the existing WCH building to further minimise visual impact.
- 6.28 Whilst the proposed building relates well to the existing WCH building, it is physically separate from it. The orientation of the building, in providing the main entrance on its western frontage from within the main car park, enables a separate dedicated access for patients using the facility allowing for their privacy and dignity. The physical separation of the building and its orientation are deliberate in this respect.
- 6.29 Furthermore, the siting and layout of the proposed development has allowed for the retention of as much existing vegetation as possible and the incorporation of this into the scheme design.
- 6.30 The location of the proposed development is therefore the 'optimal' location in relation to siting and layout to respect the future users of the facility and also to ensure minimal disruption to the functioning of the existing hospital, including ancillary facilities such as the car parking area.

Scale and Massing

- 6.31 The scale and massing of the proposed development has been carefully considered to respond to the adjacent hospital building and surrounding residential development, whilst ensuring it performs the required function of providing specialist cardiorespiratory and endoscopy facilities.
- 6.32 As outlined in Section 5 of this Statement, the proposed building comprises of two-storeys with a maximum height of 10.5m which is 3.5m lower than the existing building which has a maximum height of 14m. The proposed development has also been set back from its boundaries to the east and south and is set back from the building line of the existing WCH.
- 6.33 The DAS considers that the scale and massing of the proposed development is commensurate with the existing building and its surroundings and is necessary to accommodate all of the necessary facilities to perform its function.

External Appearance

- 6.34 The proposed development has been through an iterative design process to achieve a high-quality design and energy efficient building. It has achieved this by:
- The use of different and complementary materials, including red brick, lighter coloured brick, anodised aluminium cladding and curtain walling, to add variation and visual interest to the building.
 - A large expanse of glazing to the main entrance to help create a defined entrance feature, whilst providing maximum light to the interior spaces creating a pleasing internal environment and provide views out onto the landscaped area.
 - Projecting shrouds and brick detailing are also proposed to create a sense of unity, consistency and visual interest.
 - Complementing the existing rhythm and massing of the existing WCH building. This includes the provision of a flat roof, which also enables photovoltaic solar panels to be installed.
- 6.35 The above design features ensures that the CDC hub is of a high design quality and respects and complements the character of the surrounding area, including the existing adjacent WCH building.

Landscape and Public Realm

- 6.36 The landscape scheme is described within Section 5 of this Statement and the accompanying DAS.
- 6.37 A number of hard and soft landscaping features are proposed to create a high quality and pleasing environment for staff, patients and visitors to the CDC hub, whilst also enhancing the environment and achieving a net gain in biodiversity.
- 6.38 This is achieved through the retention of 3,070sqm of existing scrub and through the proposed shrub and native scrub planting across the site, equating to 639sqm of new

planting across the site. In addition, 4 no. specimen trees are proposed and 148m of hedgerow.

- 6.39 In terms of hard landscaping, block paving is proposed across the site and constitutes the primary hard surfacing material across the car parking area and footpaths. Seating areas are also proposed.
- 6.40 Overall, the proposed landscape scheme will enhance the environment around the CDC hub in accordance with policy DM1 of the Core Strategy and 174 of the NPPF.

Accessibility

- 6.41 The proposed development has been designed to be highly accessible through the provision of six no. parking spaces which are all accessible bays. In addition, the main entrance does not feature any steps and lifts are provided within the building.
- 6.42 The proposed development is therefore fully accessible in accordance with policy DM1 of the Core Strategy.

Conclusion on Design Matters

- 6.43 It has been demonstrated throughout this Statement and the accompanying DAS that the location, including siting, design, layout and orientation, of the proposed CDC hub was established through engagement with key stakeholders to ensure that the facility performs its function whilst minimising disruption of the existing WCH.
- 6.44 The detailed architectural design of the proposed development is of a high quality and has been through an iterative design process to ensure the desired design quality is achieved whilst maximising the functionality of the building. This includes providing space for an array of photovoltaic solar panels to maximise the energy efficiency of the building.
- 6.45 Furthermore, the comprehensive landscape scheme provides a pleasing environment for staff, patients and visitors to enjoy, whilst enhancing the natural environment through achieving a net gain in biodiversity. Overall, the proposed development represents good design and accords with the general principles of urban design identified in the adopted Development Plan and paragraphs 126 and 130 – 132 of the NPPF.

Other Environmental Considerations

- 6.46 This section provides an assessment of the proposals against identified national and local planning policies relating to environmental considerations, as set out in Section 5 of this Statement.
- 6.47 It presents a summary of the conclusions of various technical assessments that accompany this application.

Access and Transportation

- 6.48 A Transport Statement (TS) has been prepared by Curtins to consider the proposals and the potential impact on the surrounding area from a traffic and transportation perspective.

Impact on Highway Network and Safety

6.49 The Transport Statement confirms the following:

- The Trust anticipate that the proposed development would comprise an average of 33 additional staff per day, along with 86 additional patients who arrive and depart throughout the day. It is anticipated that the CDC will be operational from 09:00 – 17:00 on weekdays, with no appointments on the weekend.
- A review of baseline conditions and highway safety in the vicinity of the site has been undertaken, which has identified there are no existing safety issues that are likely to be exacerbated by the proposed development.
- The site is accessible by sustainable modes of transport. The surrounding area exhibits good levels of pedestrian and cycling infrastructure, and public transport options, and there is a significant residential catchment area within an acceptable walking distance.
- It is considered that the additional traffic from the proposed development would not have a significantly detrimental impact on the surrounding highway network, and that car parking demand for the proposed development can be accommodated within the hospital site.
- Six no. additional parking spaces will be provided, all of which are accessible bays and will be provided with EV charging facilities.
- Three no. existing car parking spaces would be converted into drop-off bays for patients / visitors using the CDC hub.

6.50 The TS also confirms that a review of relevant local and national transport planning guidance has been undertaken and that the proposed development is in general accordance with such policies and guidance.

Sustainable Transport

6.51 Sustainable transport is discussed at paragraphs 6.15 – 6.17 above. This demonstrates that the site is supported by a number of sustainable modes of travel within the surrounding area including pedestrian and cycle facilities and the provision of multiple public transport options located around the WCH site.

6.52 It also confirms that the Trust are investing in educating staff and patients around the sustainable modes of transport available, through the implementation of a comprehensive Travel Plan.

6.53 The aim of the Travel Plan is to encourage more staff and patients / visitors to travel by sustainable modes of transport and reduce the reliance on the private car which will in turn reduce the number of vehicular trips associated with WCH. Following the grant of planning permission, the CDC hub would be encompassed within the wider Withington Community Hospital Travel Plan.

Summary on Access and Transportation

- 6.54 The TS concludes that the proposed development accords with Paragraph 111 of the NPPF, as it would not have an unacceptable impact on highway safety, nor would it result in a severe residual cumulative impact on the surrounding highway network. Furthermore, the application identifies a clear commitment on the part of the Trust to influence positively the travel behaviours of both staff and patients through facilitating and supporting their arrival at site by sustainable modes of travel through the implementation of a package of measures presented within the Travel Plan.

Ecology

- 6.55 A Preliminary Ecological Appraisal Report has been prepared by RSK Biocensus to identify any potential ecological constraints associated with the proposed development. A field survey was conducted in January 2023 and again in May 2023, these surveys combined with desk-based research concluded the following:
- **Statutory designated sites** - There are no internationally designated site within 10 km of the site but there are two national statutory designated sites within 2 km of the site boundary. The closest is Chorlton Water Park Local Nature Reserve, located c. 1.2km west of site. Given the distances from site and the scale of development, it is unlikely that the proposed development will have any direct or indirect impact on these designated sites.
 - **Non-statutory designated sites** - There are four Sites of Biological Interest (SBI) within 2 km of site, with the closest is Wrengate Wood SBI located 800m from the site boundary. Given the small scale and size of the proposed development and distance from site, no impacts are anticipated on these sites.
 - **Habitats and plants** - The majority of the habitats on the site are not species-rich, have little botanical value and are ubiquitous in the wider landscape.
 - **Invasive non-native species** - Wall Cotoneaster have been identified throughout the areas of mixed scrub on the site. It is likely that Cotoneaster will be impacted by the proposed works at the site. An invasive species management plan should be produced by a specialist contractor and adhered to in relation to the proposed works.
 - **Protected and other notable species** - The areas of scrub and scattered trees on the site provide suitable nesting habitat for a range of common and widespread bird species. Precautionary measures are required to prevent destruction of any bird nests during the works.

Eight trees within the site boundary have been identified as having features suitable to support roosting bats, two assessed as high, four as moderate and two low. These trees will be retained as part of the proposed development and will not be directly impacted. The adjacent existing hospital building is identified as low quality for supporting roosting bats. Mitigation will be implemented to protect these features during the construction phase of development and will be confirmed pursuant to the implementation of a condition.

The site provides suitable habitat for hedgehogs and common amphibians. Precautionary measures are therefore required during the works to prevent any negative impacts on hedgehogs, common amphibians and other mammals which may use the site for foraging and commuting.

6.56 Through identifying the above, a number of recommendations are identified, these include:

- Production of an invasive species management plan.
- Precautionary measures to be implemented during construction to prevent disturbance to habitats and species. Including, 5m buffer zone from potential bat roost features.
- Site clearance, tree felling, arboricultural works or vegetation removal to take place outside of the breeding bird season. If this is not possible, an ecological clerk of works will be required to perform a nesting bird check a maximum of 48 hours before a removal of disturbance.
- Enhancement opportunities such as native species planting, bird boxes, log piles and hedgehog highways should be considered.

6.57 With these measures in place the impact of the proposed development would be acceptable and in accordance with Policies EN9 and EN15 of the Core Strategy and paragraph 174 of the NPPF.

Biodiversity Net Gain

6.58 A Biodiversity Net Gain Assessment has been undertaken by RSK Biocensus. This has been prepared to calculate the 'biodiversity units' using the Defra Biodiversity Metric 4.0 and confirms the following:

- The existing condition of the site comprises four habitat types with a total baseline of 2.38 biodiversity area units and 1.47 terrestrial habitat linear units across the 0.65 ha.
- Post-development plans indicate that five habitats will be created, and one habitat will be partially enhanced. As a result, the development results in a gain of 0.38 biodiversity area units, which is a **total net gain of 15.87% biodiversity area units**.
- The development retains all 1.47 terrestrial habitat linear units and creates an additional 0.14 of these units, creating a total net gain of 9.70% terrestrial habitat linear units.

6.59 It has been clearly demonstrated that considerable effort has been made to ensure no net loss in biodiversity on-site and resulted in over 15% net gain in biodiversity value as a result of the proposed development. This is a considerable benefit and exceeds the requirements of local and national planning policy.

Heritage

- 6.60 A Heritage Statement has been prepared by Turley Heritage. This concludes that the application site is not within a conservation area and there are no designated heritage assets located within the PDS.
- 6.61 It identifies that the PDS is adjacent to the western boundary of the Albert Park Conservation Area. There are listed buildings within the surrounding area, however due to distance, intervening buildings, and other considerations, they would not be affected by the Proposed Development and they have been excluded from assessment.
- 6.62 The Heritage Statement concludes that due to the presence of the existing Withington Community Hospital complex, the location, siting, form and appearance of the Proposed Development, in combination with the screening and filtering effect of existing retained trees, it is concluded that there would be no harm to the Albert Park Conservation Area. The character, appearance and significance of the conservation area, defined by its origins as a Victorian suburb, would be sustained.
- 6.63 Therefore, the proposed development accords with paragraphs 197, 199 and 206 of the NPPF and complies with Policies EN 3 (Heritage) and DC18.1 of Manchester Core Strategy.

Archaeology

- 6.64 An Archaeological Desk-based Assessment has been prepared by Salford Archaeology. This confirms that the proposed development will necessitate some ground-breaking and landscaping works which have the potential to impact on buried archaeological remains.
- 6.65 The assessment identifies that the PDS has limited potential to retain buried remains of pre-18th century relict soils and 10th century field boundaries. Any such remains that do exist within the PDS are likely to be of limited archaeological interest and therefore may be considered negligible.
- 6.66 As such, the assessment concludes that it is anticipated that no further archaeological investigation will be required and this will be confirmed in consultation with Greater Manchester Archaeological Advisory Service through the determination of the planning application.
- 6.67 The proposed development therefore satisfies the adopted Core Strategy Policy EN3 and 197 and 199 of the NPPF.

Air Quality

- 6.68 An Air Quality Assessment has been undertaken by Miller Goodall and assesses the potential changes in air quality due to the construction and operation of the proposed development and whether these potential changes would significantly alter air quality.
- 6.69 This assessment has concluded the following:
- The assessment of dust soiling and human health impacts during the demolition and construction phase of the development results in the proposal of dust

mitigation measures. The implementation of these will ensure that residual dust impacts during the demolition and construction phase are not significant.

- Concentrations of NO₂ and PM₁₀ are likely to be below their respective long and short-term objectives at the proposed development site which is therefore considered suitable for residential/ commercial use with regards to air quality. Concentrations of PM_{2.5} are expected to be below the annual mean target.

6.70 As such, it is concluded that the proposed development is not expected to have a significant impact on local air quality and therefore satisfies Core Strategy Policy EN16 and paragraph 186 of the NPPF.

Noise

6.71 dBx Acoustics Ltd have undertaken a Noise Impact Assessment (NIA) to support the proposed development which sets out the results of an environmental noise survey carried out at the site and sets the noise emission limits for externally mounted or discharging items of building service plant in order to meet the requirements of MCC.

6.72 The report states that the plant noise emission limits were set based on the lowest measured background noise levels during the survey and in accordance with MCC requirements. The results conclude that noise should not be considered as a limiting factor in granting planning permission for the proposed development.

6.73 Therefore, the proposed development complies with adopted Core Strategy Policy DM1 and paragraph 185 of the NPPF.

Flood Risk and Drainage

6.74 A Flood Risk Assessment has been prepared by CCS alongside a Surface Water Management Plan to provide information on the nature of flood risk and confirm the surface run-off rate at the site. These documents confirm the following:

- The application site is located within an area classified as Flood Zone 1 according to the Government's Flood Map for Planning, meaning that the application site has a low probability of flooding from rivers or sea.
- The proposal falls within the 'more vulnerable' development in the Flood Risk Vulnerability Classification. This category of development within Flood Zone 1 is deemed appropriate.
- The application site is considered to be at a low risk from fluvial, pluvial, groundwater, canal and drainage/ sewer flooding.

6.75 As the site is situated within a critical drainage area, surface water is to be managed to ensure that the Site does not increase flood risk to areas within or near the proposed development's boundary.

6.76 The Surface Water Management Report concludes the following:

- All feasible SuDS methods, and surface water discharge destination have been assessed, with the feasible SuDS methods being permeable paving, filter drains,

swale / shallow ponds, cellular units and a flow control chamber, and the surface water destination being to a surface water sewer via an existing drainage network.

- The post development run-off rates are an increase of the 1-year greenfield rate but are the equivalent to the 30-+year greenfield rate and a 6% reduction of the 1000-year greenfield rate. Therefore, as the greenfield rates for extreme storms have not been exceeded, the discharge rates are deemed to be acceptable, as they meet the requirements set out in the Non-Statutory Technical Standards for Sustainable Drainage Systems.
- The post development surface water run-off volume is a 13% reduction of the greenfield volume for the same storm event and duration. Therefore, the discharge volume deemed to be acceptable, as it meets the requirements set out in the Non-Statutory Technical Standards for Sustainable Drainage Systems.
- The MicroDrainage calculations show that with these SuDS methods and volumes, no flooding will occur for all storms up to and including the 100-year + 40% storm event.
- The management and maintenance of the surface water drainage networks and SuDS features will be by estate management of the clinical site, where the maintenance of the drainage and SuDS will form part of the overall site management / landscaping / gardening.

6.77 It is therefore considered that the proposed development is in accordance with Core Strategy Policies EN 4 and EN14 and NPPF paragraph 167.

Ground Conditions

6.78 A Preliminary Risk Assessment has been prepared by Groundtech Consulting Ltd on behalf of CCS Consulting. This report establishes the sites environmental and geotechnical background and identifies any potential constraints which may affect the proposed development on the site. The report concludes that:

- The proposed development's risk to human health is considered to be *Moderate to Low* as it will be likely that there will be potentially contaminated Made Ground soils beneath areas of proposed soft landscaping.
- The risk to controlled waters is *Low* as no sources of mobile contamination have been identified onsite.
- The ground gas risk is considered to be *Moderate* as deep Made Ground may be present beneath the site associated with the demolished buildings.

6.79 Further ground investigation is therefore required and can be secured by a suitably worded condition to be applied to any future planning permission. The proposed development is therefore in accordance with Policy EN18 of the Core Strategy and paragraph 183 of the NPPF.

Conclusion on Policy Considerations

- 6.80 This Section has demonstrated that the principle of development is acceptable and supports the wider strategic aim of the national CDC programme. The design of the scheme has been informed by environmental and land use considerations, in particular impacts on the existing hospital buildings and the location within a primarily residential area.
- 6.81 Overall, the assessment finds the proposed development to be in full accordance with the relevant policies of the Development Plan and supported by a number of relevant other policy considerations, including the NPPF.

7. Planning Balance and Conclusions

- 7.1 The Community Diagnostics Centre Programme is a £2.3 billion investment committed by the Government with the aim of delivering up to 160 CDC's by 2025. Withington Community Hospital (WCH) was identified, in October 2021, as the location to host the Manchester and Trafford CDC programme.
- 7.2 WCH is already recognised as an established community health facility in South Manchester, providing a range of health services for the local community. The CDC programme provides the opportunity for a dedicated facility at WCH to locate specialist cardiorespiratory and endoscopy services to integrate and streamline these important diagnostic pathways. In doing so, the new facility will ensure much-needed diagnostic services are provided equitably across Manchester and Trafford.
- 7.3 The existing imaging capabilities at WCH, allowing the provision of limited cardiorespiratory and endoscopy services, was possible through the receipt of initial funding from the CDC programme. However, due to the constrained space within the existing WCH building, these services are currently very limited and located within spaces that are not fit for purpose.
- 7.4 The CDC programme has allocated a significant £14.2 million investment to WCH to enable the delivery of a dedicated building for these specialist services. This will enable more patients to start receiving appropriate treatment more quickly, within their community and within facilities that have been built for that purpose to provide the highest standard of care for patients.
- 7.5 There are a number of significant benefits that would be realised through the delivery of the WCH CDC 'hub', as follows:
- Integrating and streamlining diagnostic pathways. By locating the cardiorespiratory services at WCH, this will enable patients to start receiving appropriate treatment more quickly with a positive impact on health outcomes.
 - The endoscopy service will offer the dual purposes of a "hub" for screening and surveillance endoscopy for Manchester and Trafford, building on the unit's existing role as a leading provider for the National Bowel Cancer Screening Programme (BCSP), and providing a dedicated diagnostic endoscopy site for the South and Central Manchester populations.
 - This model will protect the capacity for screening and surveillance of the highest-risk populations, deliver the highest quality diagnostic endoscopy close to people's homes, and release capacity at the specialised acute sites for complex and therapeutic procedures.
 - The CDC will provide a Joint Advisory Group on Gastrointestinal Endoscopy (JAG) accreditable endoscopy unit at WCH.
- 7.6 The proposed CDC at WCH is of both local and national importance, which is confirmed through the significant amount of funding received.

- 7.7 This Statement and the accompanying technical documentation demonstrate that the proposed development would accord with the adopted Core Strategy and the NPPF and would align with other relevant economic and regeneration strategies, including the Our Manchester Industrial Strategy and the NHS 'Delivering a Net Zero Health Service' commitments.
- 7.8 Moreover, the strategic case for the proposed development, as summarised above, confirms the benefits resulting from the proposals which both individually and cumulatively, carry substantial weight in the favour of the proposed development in the overall planning balance.
- 7.9 The proposed development has been designed in consultation with a number of stakeholders and is sensitive to the receiving environment such that the resultant impacts would be limited and well within established thresholds of acceptability.
- 7.10 The planning balance clearly falls in favour of the grant of planning permission: a decision to grant planning permission would be in accordance with the development plan, and material considerations do not weigh against this, rather as a whole they convey considerable further support.
- 7.11 Planning permission should, therefore, be granted without delay, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Paragraph 11 of the NPPF. In doing so, MCC will be lending support to a highly beneficial development that contributes positively to the vision for Manchester to be a City with an increased and sustainable healthy population.