HOARE LEA

Northern Pathology Development, Christie Hospital. Withington, Greater Manchester.
Northern Pathology Development Ltd.

SUSTAINABILITY
ENVIRONMENTAL STANDARDS STATEMENT

REVISION P03 – 17 FEBRUARY 2026

Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
P01	12/09/2025	Draft issue for information.	J. Robb	K. Krasowska	J. Nuttall
P02	29/10/2025	Revised following receipt of combined stage 3 report and Construction Management Plan.	J. Robb	K. Krasowska V. Wall	J. Nuttall
P03	17/02/2026	Minor updates following Deloitte comments.	J. Robb	K. Krasowska	J. Nuttall

This document has been prepared for The Christie NHS Foundation Trust only and solely for the purposes expressly defined herein. We owe no duty of care to any third parties in respect of its content. Therefore, unless expressly agreed by us in signed writing, we hereby exclude all liability to third parties, including liability for negligence, save only for liabilities that cannot be so excluded by operation of applicable law. The consequences of climate change and the effects of future changes in climatic conditions cannot be accurately predicted. This report has been based solely on the specific design assumptions and criteria stated herein.

Project number: 53/00122
Document reference: 5300122-HLE-XX-XX-RP-ST-Environmental Standards Statement-P03

Contents.

Audit sheet.	**2**
1. Introduction.	**4**
1.1 The Site.	4
1.2 The Proposed Development	4
2. Sustainability Policy.	**5**
2.1 National Policy.	5
2.2 Local Policy.	6
2.4 Trust Policies and Guidance.	8
3. Sustainability Proposals aligned to Manchester City Council and The Trust Policy.	**10**
3.1 Energy and CO_2 emissions.	10
3.2 Water and flood risk.	12
3.3 Materials.	13
3.4 Waste.	14
3.5 Transport.	15
3.6 Pollution.	17
3.7 Ecology and Biodiversity.	18
3.8 Community.	19
4. Conclusion	**20**

1. Introduction.

This Environmental Standards Statement has been prepared by Hoare Lea on behalf of Northern Pathology Development Limited and is submitted in support of an application for full planning permission for the redevelopment of the existing temporary Derek Crowther Building (Block 29), on Wilmslow Road to build a new Pathology Development with integrated clinical facilities (the "Proposed Development") at the Christie Hospital (the "Christie") in Withington, Manchester.

1.1 The Site.

The Site comprises the existing temporary Block 29, Derek Crowther Building of the Christie Hospital in Withington, which currently hosts clinical and non-clinical facilities associated with the Christie. The total site area is 1,565sqm.

The Site is located to the northeast of the Christie Hospital estate. It is bound by a private access route for the Christie Hospital to the south, residential development to the west, and local amenities and retail units to the north.

Wilmslow Road borders the Site immediately to the east, which includes a partially segregated cycle lane. The Christie is a major land use within the area. The surrounding area contains a range of uses but is largely low rise (2-3 storeys) residential in nature.

To the north of the Christie Hospital comprises local amenities, with retail units lining Wilmslow Road between the Site and the Grade II Red Lion Pub. Beyond this, Wilmslow Road leads towards Withington District Centre.

To the east of the Site and Wilmslow Road comprises Withington Dental Care Centre beyond this, the area comprises relatively low density two storey residential properties. The Manchester Cancer Research Centre is located to the south of Cotton Lane.

1.2 The Proposed Development

The Proposed Development comprises a three-storey building with additional essential plant equipment located on the central area of the roof, to be appropriately screened, and a link bridge connecting into the existing Christie Hospital estate.

The Proposed Development will house the Christie Pathology Partnership ("CPP"), a joint venture providing pathology services to all Christie patients and in support of Cancer patients across the wider Greater Manchester health economy. It will house biochemistry and blood science laboratories which will support the wider Greater Manchester network for a very small number of specialist tests, however most work is for patients of the Christie.

The Proposed Development will comprise a relocation of existing pathology facilities, which are undersized, overcrowded and not fit for purpose in respect of ventilation and flow. The Proposed Development will enable the colocation of laboratories with clinical services to ensure rapid sample transfer, ultimately enabling faster diagnostic turnaround times crucial for patient treatment.

As the Proposed Development will comprise a relocation of existing facilities within the Christie Hospital, it can be confirmed that there will be no material net increase in visitor numbers, nor consequently any increase in traffic and car parking at the Christie Withington Campus.

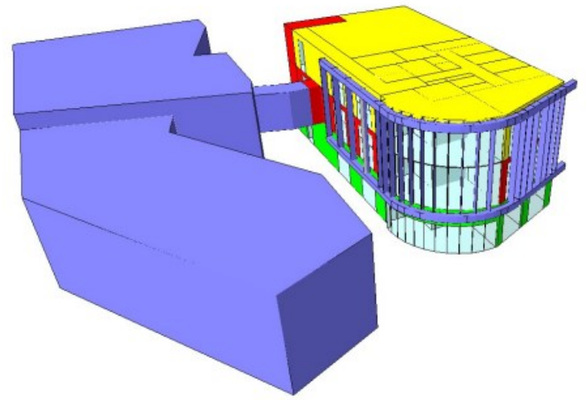


Figure 1- Dynamic Simulation Model Image.

Table 1 Reports used in the preparation of this document.

Report required	Document reference	Organisation/ contact details
Energy Statement	M5387-DSSR-XX-XX-RP-ME-0101_P03	DSSR
Embodied carbon assessment	n/a – confirmed with Case Officer as not relevant/needed	n/a – confirmed with Case Officer as not relevant/needed
BREEAM Pre-Assessment report	n/a – confirmed with Case Officer as not relevant/needed	n/a – confirmed with Case Officer as not relevant/needed
Transport Assessment	Item 08 – Northern Pathology Development – Transport Statement	WSP
Air Quality Assessment	3422843-HLE-RP-AQ-Christie Northern Pathology Development_Rev01	Hoare Lea
Noise Assessment	025944-R01-B Planning noise report	Sandy Brown
Ecological Assessment	17956_R01b_LJ	Tyler Grange
Flood risk and drainage assessment	NPD-Z1-DCE-G580-RP-XX-9060_Northern Pathology Unit ODSR_P03	DeSimone
Waste management plan	Northern Pathology Operational Waste Strategy 250731	WSP
Statement of Community Engagement	Northern Pathology Developments – Statement of Consultation_V2	Deloitte

2. Sustainability Policy.

2.1 National Policy.

Key policy documents relating to sustainable development are summarised below.

2.1.1 Health and Care Act 2022.

Through the Health and Care Act 2022, the NHS has embedded a commitment to Net Zero within legislation. The Act places a new duty on the NHS and all trusts, foundation trusts, and integrated care boards to work towards statutory emissions and environmental targets.

Under the Act, when exercising its function, NHS England must:

1. Work to address and comply with:
   a. The UK net zero emissions targets set out in the Climate Change Act 2008, section 1.
   b. The environmental targets set out in the Environment Act 2021, section 5.
2. Adapt to any current or predicted climate change impacts that have been identified within the Climate Change Act, section 56.

The Act also permits the publication of statutory guidance by the NHS England to assist in discharging these duties and support the net zero pathway.

2.1.2 Approved Document Part L 2021: Conservation of fuel and power.

Part L of the Building Regulations is the mechanism by which government is driving reductions in the regulated CO_2 emissions from new buildings. The Proposed Development will need to comply with Part L2A of Approved Document Part L 2021 (ADL 2021) which was enforced on 15th June 2022.



The main updates under ADL 2021 (since its 2013 predecessor) are as follows:

- It is now significantly more challenging to achieve compliance with fossil fuel heating, therefore an all-electric heat pump strategy is likely to be the preferred solution.
- A varying carbon factor associated with grid electricity is 73% lower on average than ADL 2013.
- A new non-domestic building will deliver a 27% reduction in CO_2 emissions on average across the new-build non-domestic building mix relative to ADL 2013; and
- A primary energy target has been introduced and the Fabric Energy Efficiency target retained.
-

2.1.3 Approved Document F (England), 2021: Ventilation.

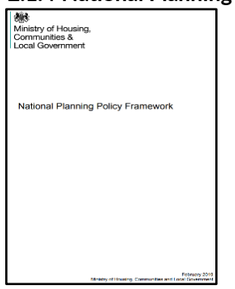


Approved Document F was last updated in 2021. The flats and studios within the Proposed Development will be assessed under Volume 1, which applies to domestic buildings. The amenity spaces will be assessed under Volume 2, which applies to non-domestic buildings.

The main updates to Approved Document F 2021 are provided below:

- New guidance on performance-based ventilation standards will allow designers to assess ventilation strategies against individual volatile organic compounds as an alternative route to using a total VOC limit.
- The whole dwelling ventilation rates per bedroom have increased by nearly 50% in ADF 2021, compared to ADF 2010. The ventilation rates for continuous extract and intermittent extract have not changed, and passive stack ventilation (PSV) is no longer included as an option in ADF 2021.
- Air quality monitors (which may be CO_2 monitors) are required to be installed in offices; in rooms where "singing, loud speech or aerobic exercise or other aerosol generating activities" take place; in rooms "where members of the public are likely to gather"; and in rooms that are maintained at both low temperatures and low humidities.
- Occupiable rooms in offices require outdoor air to be supplied at the greater of 10 l/s per person or 1 l/s.m² (the l/s.m² criterion is new).
- Common spaces in offices (including circulation spaces) require either natural ventilation openings of at least 1/50 of the floor area, or a mechanical supply of outdoor air at a minimum rate of 0.5 l/s.m² (note that this is less than the 1 l/s.m outlined in the government's draft proposals.)
- Amended guidance on recirculating systems states that systems should be capable of operating in a mode that prevents the recirculation of air between different spaces, rooms, or zones, unless suitable filtering or cleaning systems are in place.
- Government proposals to increase required ventilation capacity in offices and specify ventilation rates in 'high risk' rooms, in response to COVID-19, have not been adopted. This is in anticipation of more concrete evidence on the impacts.

2.1.4 National Planning Policy Framework.



The National Planning Policy Framework (NPPF) was first published in on 27 March 2012 and most recently updated in December 2024. The updated NPPF has superseded all Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) documents, with the exception of PPS10 (Waste). The NPPF sets out the Government's strategy on the delivery of sustainable development.

The NPPF states that there is a presumption in favour of sustainable development.

The following is extracted from paragraph 8 of the NPPF:

"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

Furthermore, in relation to energy policy, paragraph 161 sets out that:

"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to:

- shape places in ways that contribute to radical reductions in greenhouse gas emissions,
- *minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings;*
- *and support renewable and low carbon energy and associated infrastructure."*

In respect of energy policy contained within the NPPF, paragraphs 162 to 167 set out that:

"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to:

- shape places in ways that contribute to radical reductions in greenhouse gas emissions,
- *minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings;*
- *and support renewable and low carbon energy and associated infrastructure."*

In respect of energy policy contained within the NPPF, paragraphs 162 to 167 set out that:

162. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

163. The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.

164. New development should be planned for in ways that:

a. *avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and*

b. *help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.*

165. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a. *provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);*

b. *consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*

c. *identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for collocating potential heat customers and suppliers.*

166. In determining planning applications, local planning authorities should expect new development to:

a. *comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*

b. *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

167. Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.

[1] https://www.gov.uk/government/consultations/the-future-buildings-standard

[2] https://www.manchester.gov.uk/downloads/download/4964/core_strategy_development_plan

2.1.5 Future Buildings Standard 2025[1]

The Government consulted on the forthcoming changes to the Building Regulations for non-domestic buildings in multiple rounds between 2021 and 2024. The intention of the standard is to establish the pathway to highly efficient non-domestic buildings which are zero carbon ready, better for the environment and fit for the future.

The outcomes of this consultation are not yet public knowledge, though it is expected they will impact on Part 6, Part L, Part F and Part O of the Building Regulations.

2.1.6 Heat and Buildings Strategy.

Released in October 2021, the Government's Heat and Buildings Strategy outlines the mechanisms required to reduce the cost of low-carbon heating technologies to support transition away from fossil fuels.

All privately rented commercial buildings are required to have minimum EPC band B by 2030 in England and Wales. Further, all commercial buildings >1,000 m^2 will require an operational energy assessment, completed as part of the Part L2a 2021 update. The building logbook should include a forecast of the building's actual energy use (kWh/year) broken down by fuel type, including all metered energy uses and unregulated loads. The forecast may be determined using design calculations, energy benchmarks, an energy forecasting methodology such as CIBSE's TM54 or any other building modelling or spreadsheet tools.

2.2 Local Policy.

2.2.1 Manchester Core Strategy 2021-2027[2].

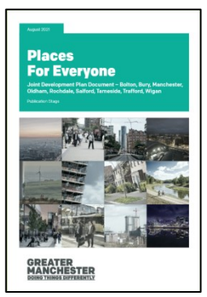
Manchester's Core Strategy outlines the adopted Manchester City Council policies for selected sustainability themes including:

- Energy and CO_2
- Water and flood risk
- Materials
- Waste
- Transport
- Pollution
- Ecology and biodiversity
- Community

Following the adoption of the Places for Everyone on 21st of March 2024, several of the Manchester Core Strategy policies were either fully or partially replaced. This document contains the most recent adopted policies to date.

2.2.2 Places for Everyone[3].

Places for Everyone is a long-term plan of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) for jobs, new homes, and sustainable growth. The plan, adopted in March 2024 is the result of a process that began with the publication of the first Greater Manchester Spatial Framework in 2016 and has been informed by the feedback received from residents, businesses, and the development industry.



The plan addresses the sustainable integration of Greater Manchester's transport network. Of particular reference to the Proposed Development, the plan sets out the following sustainability policies:

- JP-S1*: Sustainable development
- JP-S2*: Carbon and energy
- JP-S3: Heat and energy networks
- JP-S6: Resource efficiency

[3] https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/

- JP-G8*: A net enhancement of biodiversity and geodiversity
- JP-P1: Sustainable places
- JP-C1*: An integrated network
- JP-C8: Transport requirements of new development

**Policies adopted in the revised Manchester Core Strategy*

From the policies above, Policy JP-S2 includes an expectation that the energy assessment will follow the latest Building Regulations Part L2021, and up to 2028, new development will follow the energy hierarchy to achieve operational net zero carbon including offsetting of any remaining carbon emissions. From 2028 onwards, the development will seek to achieve net zero carbon 'in construction' too.

2.2.3 5-Year Environment Plan for Greater Manchester.



The Greater Manchester Combined Authority (GMCA) set an ambitious target to be a zero-carbon city by 2038. As part of this plan, the Greater Manchester Spatial Framework sets out plans for all new development to be zero carbon by 2028.

Included in the five-year plan are a number of key items, including, but not limited to; increasing local renewable electricity generation, increasing the diversity and flexibility of energy supply and decarbonising how buildings are heated (serviced). These items encourage passive design and a shift away from fossil fuels to service buildings. The five-year plan also notes that new developments should seek to generate 20% onsite / renewable energy generation.

Additionally, the strategy includes a clean air plan to help tackle poor air quality – safeguarding Manchester residents from high levels of Nitrogen Dioxide (NO_2).

With the first version released in 2019, the five-year plan has been updated in December 2024. Based on the lessons learnt, the new plan adopted challenging but achievable targets for the next 5 years replacing the fixed carbon budget approach. This way, the progress can be regularly monitored and reported upon. Commitments of relevance to this refurbishment project include:

- Sustainable and energy efficient buildings: continue to use the Planning and Building Control system to accelerate the adoption of high standards for new and refurbished buildings
- Better understand and factor in embodied carbon in new and refurbished developments

Figure 1 provides an extract from the Actions Table of Greater Manchester's Five-Year Environment Plan which summarises tangible measures that can be implemented to support the commitments highlighted above.

Direct Actions	Lead	Enabling Actions	Lead	Cost	Impact
8. Objective: Ensure all new developments are net zero carbon and sustainable					
Use the Planning and Building Control system to accelerate the adoption of high standards for new development and refurbished buildings	GMCA, LAs	Support the environmental policies in Places for Everyone, through producing additional guidance for planners and developers on embodied and operational net zero, water and resource efficiency, and sustainable construction	GMCA, LAs	££	H
		Use our influence and lead by example in our growth priority areas through working with developers to adopt higher standards	GMCA, LAs	££	H
		Deliver 10,000 truly affordable net zero homes (TANZ) as part of our Housing First agenda	GMCA, LAs	£££££	H
		Explore the potential to incorporate PAS2080 standards, carbon management plans, and other environmental standards into all public investment	GMCA, LAs	££	M
		Use the Embodied Carbon Calculator developed for GMCA by UoM to specify and procure retrofit and new build materials with the least embodied carbon impact		££	H

Figure 1 Actions Table, GM 5 Year Environment Plan 2025-2030

2.4 Trust Policies and Guidance.

2.4.1 Delivering a 'Net Zero' National Health Service.

In alignment with national carbon reduction goals and their own net zero commitment, the NHS have worked to develop clear and feasible net zero targets. The Delivering a 'Net Zero' National Health Service report is the current NHS statutory guidance.

An NHS Carbon Footprint target has been established which is largely underpinned by the emissions set out within the Greenhouse Gas Protocol (GHGP) scopes:

- GHGP Scope 1: Direct emissions from owned or directly controlled sources, on site.
- GHGP scope 2: Indirect emissions from the generation of purchased energy, mostly electricity.
- GHGP scope 3: All other indirect emissions that occur in producing and transporting goods and services, including the full supply chain.

However, these scopes do not encapsulate all NHS emissions. As such, the NHS will also work towards net zero for an NHS Carbon Footprint Plus which includes the three scopes listed above but also any emissions from patient and visitor travel to and from NHS services and medicines used within the home (Figure 2).

From these findings, the NHS have set two net zero targets:

For the emissions directly control by the NHS (the NHS Carbon Footprint), the aim is to reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032;

For the emissions the NHS influences (the NHS Carbon Footprint Plus), the aim is to reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.

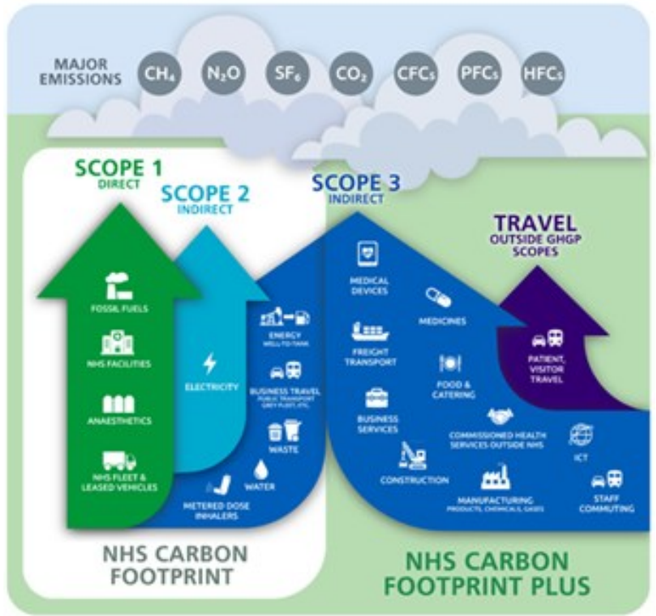


Figure 2- GHGP Scopes in the context of the NHS Carbon Footprint and NHS Carbon Footprint Plus.

This Sustainable Development Management Plan (SDMP) was developed by the Trust in response to UK Climate Change Act (2008), the NHS Long Term Plan and the Delivering a 'Net Zero' National Health Service Campaign. The SDMP outlines the Trust rationale, aims, objectives, plans and priorities for improving local, national and global sustainability.

2.4.2 NHS Net Zero Carbon Building Standard

In 2023, the NHS released their NHS Net Zero Building Standard which outlines a bespoke methodology for calculating and assessing both Operational Energy and Embodied Carbon to meet their Whole Life Carbon compliance limits. The NHS released bespoke tools alongside the NZ Building Standard document to be used by the design team. The limiting values, produced by the Operational Energy and Carbon Compliance tool, is reported against the TM54 Operational Energy, Part L 2021 and Embodied Carbon Assessment outcomes. The process is repeated at every Stage to ensure the evolution of the design development is captured in the results.

Figure 3 summarises the methodology behind Energy Compliance tool in order to generate the Energy Limit value. In summary, the tool has set profiles containing information on occupancy, small and large power, operational profiles, usage intensity, and ventilation rates. As these parameters are predetermined, much of the Energy Limit outcome relies on the fabric and HVAC efficiencies.

The key factors that can reduce the make-up of the Energy limit value are:

- Performance targets for other elements of the building – such as envelope, HVAC and DHW Systems
- Maximise Heat Recovery through holistic approaches throughout facilities wherever possible
- Energy Storage and demand response should be incorporated where appropriate
- Follow the Energy Hierarchy: Be Lean, Be Clean, Be Green, Offset
- Establish Low Carbon Energy Supply

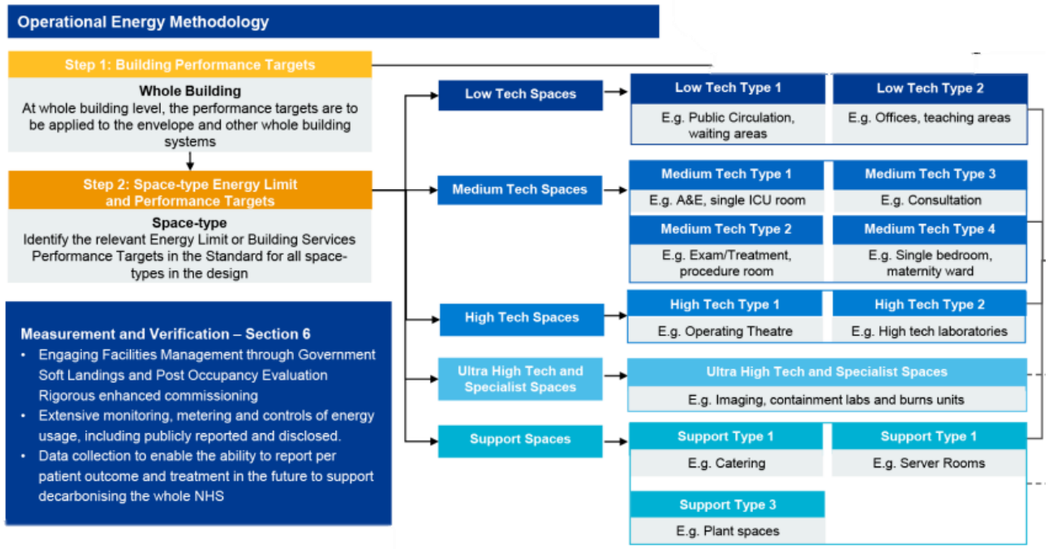


Figure 3 - NHS NZ Operational Energy methodology summary.

Figure 4 below captures the Embodied Carbon hierarchy which is to be used to aid in reducing the embodied carbon limit. The NHS NZ Building Standard highlights the importance of embodied carbon within the Whole Life Carbon approach. According to the NHS NZ standard, the key steps to consider when reducing Embodied Carbon are:

- Use embodied carbon reduction hierarchies, to reduce the requirements for raw materials and optimise embodied carbon, supporting a circular economy
- Consider flexibility and adaptability carefully
- Capture all whole team design decisions regarding elements of the design that significantly impact energy and carbon performance
- Achieve increasing robustness of carbon reporting and data quality over time, pushing towards EPD data sets for all building elements
- Carbon must be reported throughout the design stages at OBC and FBC as a minimum
- Upfront carbon reporting must also be undertaken post construction to verify as built information

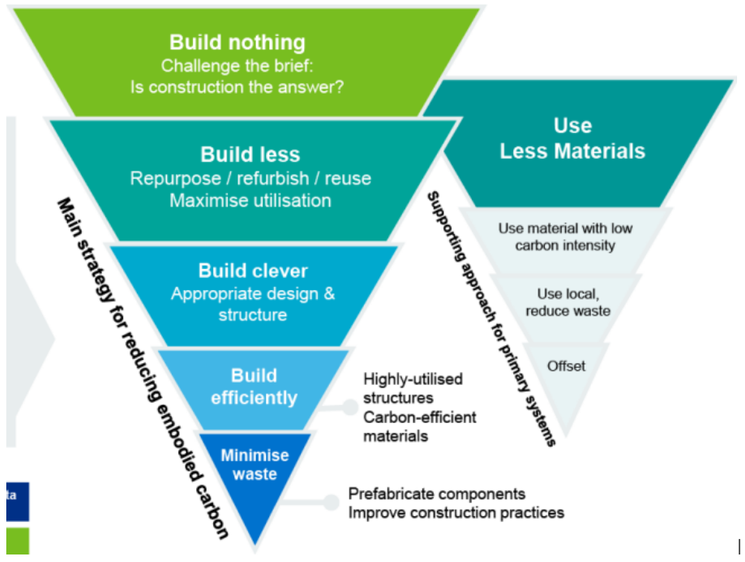


Figure 4 - NHS NZ Embodied Carbon hierarchy diagram.

2.4.3 Greater Manchester NHS Green Plan.

The Greater Manchester (GM) NHS Green Plan aspires to deliver a sustainable health care system which promotes the health and wellbeing of residents within Greater Manchester. The plan seeks to achieve health equity whilst also minimising environmental impacts and ensuring climate resilience.

To reach this vision, two overarching goals have been set:

- Achieve a net zero NHS GM Integrated Care Carbon Footprint by 2038 – Under this target assurance must be given by providers to confirm they are delivering against their own plans, whilst also focusing on priorities that can be delivered most effectively by working together.
- Attain a net zero NHS GM Integrated Care Carbon Footprint Plus by 2045 – this is a national NHS target to eliminate the carbon impact of the goods and services they buy. The NHS will work closely with national and regional partners to achieve this (as outlined in section 2.1.6 above).

To meet the targets set out under the GM NHS Green Plan, specific focus areas have been outlined:

- Workforce, networks and system leadership.
- Sustainable models of care
- Digital transformation
- Travel, transport and air quality
- Estates and facilities
- Medicines
- Supply chain and procurement
- Food and nutrition
- Climate change adaptation
- Green space and biodiversity
- Social value and anchors

The focus areas relevant to the Proposed Development will be discussed in section 3 alongside the Manchester Core Strategy.

3. Sustainability Proposals aligned to Manchester City Council and The Trust Policy.

In addition to specific project targets relating to ADL 2021 and BREEAM, the Proposed Development will align with the local policies that are outlined below.

3.1 Energy and CO_2 emissions.

3.1.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for energy.

Table 2 MCC policies relating to energy.

Policy Reference		Target
Energy and CO_2	CS Policy EN4	All development must follow the principle of the Energy Hierarchy, being designed: – i. Minimise energy demand. – ii. Maximise energy efficiency. – iii. Use renewable energy. – iv. Use low carbon energy; and – v. Utilise other energy sources. In addition: – From 2025 any residual carbon emissions that cannot be fully mitigated on-site should be offset, in agreement with the relevant local planning authority through a financial contribution to a carbon offset fund. – As an interim measure, development should be consistent with the 2022 Part L Building Regulations unless superseded by changes to building regulations and/or national or local planning policies. – Incorporate adequate electric vehicle charging points, in line with Part S of the Building Regulations, unless superseded by relevant Local Plan policies, to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site; – Where practicable, prioritise connection to a renewable energy/heating/cooling network in the first instance or a low carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date
	CS Policy EN5	The Proposed Development is located within the Regional Centre, a strategic area indicated on the key diagram, which is expected to have a major role to play in achieving an increase in the level of decentralised, low and zero carbon energy supplies available. Where investment or development is being undertaken into or adjacent to a public building/asset or district heating network, full consideration shall be given to the potential role that these can have in providing an anchor load within a decentralised energy network or in creating opportunities for CO_2 reduction funded by contributions.
	CS Policy EN6	An Energy Statement is required to demonstrate compliance with Part L in line with the energy hierarchy and, for electricity intense buildings i.e. commercial buildings with a high proportion of emissions from electricity use (>45kgCO_2/m^2), a minimum +10% increase on Part L 2010. Where the CO_2 emissions reduction required under any future revision to Part L of the building regulations becomes greater than 10%, the reduction under building regulations would apply.
	CS Policy EN7	For renewable energy generation priority should be given to PV installation where technically feasible, alternative technologies will be appropriate where the equivalent generation is evidenced. For non-residential developments, achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028. Include a detailed energy statement to demonstrate via site relevant evidence how the development has sought to maximize reductions in carbon emissions in line with relevant policy targets, including the minimisation of overheating risks and appropriate measures for post occupancy evaluation. Whole life cycle emissions should be considered where possible.
		– Proposals must take account of potential opportunities to source heat from adjoining developments or nearby heating networks. – Heating and cooling systems will have capability of connecting to the decentralised heating network.

3.1.2 GM NHS Green Plan.

The following table summarises the actions within the GM NHS Green Plan which are relevant for energy and CO_2 emissions:

Focus area	Action
Estates and facilities	– Commission a high-level baseline assessment of the GM NHS Estate to identify priority areas (and indicative costs) for decarbonisation. – Identify and implement existing decarbonisation initiatives across the primary care estate to deliver early benefits to the sector. – Develop a Sustainable Buildings Policy for NHS GM Integrated Care to ensure that all opportunities to reduce the carbon impacts of the NHS estate are maximised – including both new build and retrofitting.

3.1.3 Approach.

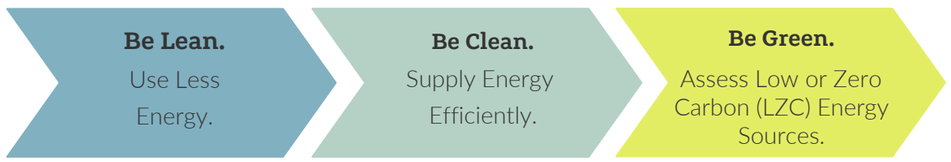
In response to the GM NHS Green Plan, the Proposed Development is following the recommended four-step approach:

3. Making every kWh count: investing in no-regrets energy saving measures
4. Preparing buildings for electricity-led heating: upgrading building fabric
5. Switching to non-fossil fuel heating: investing in innovative new energy sources
6. Increasing on-site renewables: investing in on-site generation

The Energy Strategy [M5387-DSSR-XX-XX-RP-ME-0101] details how energy and CO_2 emissions have been assessed in accordance with the policies listed above.

The Proposed Development will limit its impact on climate change by managing CO_2 emissions associated with energy use. The energy and CO_2 emissions appraisal has been based on the following approach.

Figure 5 Energy Hierarchy.



Policy EN6 states that applications for commercial developments exceeding 1,000m^2 will be expected to achieve a minimum +10% increase on Part L 2010. However, the publication of the Core Strategy document, Approved Document Part L has since been updated in 2013 and again in 2021. Broadly speaking, compliance with Part L 2013 required a 9% reduction in carbon emissions compared to Part L 2010. Further, a new non-domestic building assessed under ADL 2021 standards is required to deliver a 27% reduction in CO_2 emissions on average relative to ADL 2013. Therefore, compliance with ADL 2021 will automatically achieve the required improvement under ADL 2010.

Based on the energy statement cited above, dated July 2025, the Proposed Development is currently forecasting 7.5% reduction in CO_2 emissions beyond the Building Regulations Part L 2021 'baseline' Target Emission Rate (TER). The TER baseline is a benchmark determined by the Part L notional case and is the minimum requirement set by Part L in order to gain compliance with Building Regulations. As the Proposed Development is expected to surpass the ADL 2021 requirements, the building will far exceed the MCC EN6 policy. The decarbonisation of the grid has resulted in the carbon intensity of mains gas being higher than for electricity and therefore strengthening the argument that building services strategies moving forward should be electric led.

3.2 Water and flood risk.

3.2.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for water and flood risk.

Table 3 MCC policies relating to water and flood risk.

Policy Reference		Target
Water	CS Policy EN14	– Limit the risk and impact of flooding. – Limit increases in surface water runoff.
	CS Policy EN17	– Ensure no decreases to water quality. – Minimise surface water runoff. – Open any culverted watercourses.
Flood Risk	CS Policy EN14	– Limit the risk and impact of flooding. – Limit increases in surface water runoff
	CS Policy EN17	– Ensure no decreases to water quality. – Minimise surface water runoff. – Open any culverted watercourses.

3.2.2 GM NHS Green Plan.

The following table summarises the actions within the GM NHS Green Plan which are relevant for water and flood risk:

Focus Area	Action
Climate Change Adaptation	Work with Combined and Local Authority partners to build a more collaborative approach and improve understanding of climate change impacts encompassing supply chains, key transport infrastructure, areas vulnerable to flooding and prioritised opportunities for adaptation.

3.2.3 Approach.

The main priorities of the MCC policies do not relate to water conservation issues but instead encourage no increase in surface water runoff and relate to preventing pollution from entering watercourses. The Proposed Development will aim to reduce the overall consumption of water within the building, in order to limit the resource requirements and ensure that any future impact of water scarcity is limited by the features within the scheme.

The proposed strategy will be water efficient, incorporating measures to reduce potable water consumption through efficient fixtures, and careful management strategies.

The following measures for water have been identified and will be implemented:



Water Efficiency Measures

Consideration has been given to water efficiency in order to meet the requirements of the Building Regulations Part G as a minimum. It is aimed that a 12.5% improvement in water consumption over the notional baseline will be achieved. The following water consumption levels should be achieved in order to reduce consumption and align with BREEAM targets:

- 4.5l single flush WCs
- Wash hand basin taps flow rate limited to 8l/min
- Shower flow rates limited to 10 l/min
- Domestic dishwashers 13 ltrs/cycle
- Kitchenette taps 8 ltrs/min



Major Leak Detection Systems (landlord)

A leak detection system capable of detecting a major water leak on the main water supply will be specified and installed on the buildings water supply.



Metering

Water meters will be installed on the mains water supply with a pulsed output to enable connection to a 'Building Management System' (BMS) for the monitoring of water consumption.

3.3 Materials.

3.3.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for materials.

Table 4 MCC policies relating to materials.

	Policy Reference	Target
Materials	CS EN19	– Require all developers to identify consistency with the waste hierarchy. – Provide a project waste management plan. – Promote innovation in order to make progress towards a closed loop waste management system. – Provide accessible facilities.
	CS EN20	– Encourage the efficient use of minerals and promote the use of secondary/recycled aggregates, wherever possible as an alternative to primary extraction and identify and safeguard sites for its storage, processing and transfer. (See also Waste Policy EN19.) – Encourage and safeguard the sustainable transport of minerals, including by use of rail, wherever possible. – Ensure that any adverse environmental impacts of storage, processing and transfer on neighbouring uses are minimised.
	CS EN19	– Require all developers to identify consistency with the waste hierarchy. – Provide a project waste management plan. – Promote innovation in order to make progress towards a closed loop waste management system. – Provide accessible facilities.

3.3.2 Approach.

During the next stage, this assessment will be further refined and consideration given to minimising material quantities and selecting materials with low embodied energy potentially through reclamation or high levels of recycled content.

All materials, where viable, will additionally be procured through sustainable sources and products will be preferred with environmental certification such as BES6001 and ISO14001 certified supply chains.

The Proposed Development will achieve the following:

– Timber to be sourced from sustainable sources accredited by the FSC

Products certified with ISO14001 and BES6001Robust materials will also be specified to enable a long life with low maintenance.

The following opportunities to improve the sustainability of material selection have been identified and will be implemented:



Material Sourcing
Where feasible, the Proposed Development will endeavour to source materials locally. This will assist in reducing the embodied carbon of the materials by limiting transportation related emissions and would support the local economy.



Maximise Recycled Content of Materials
A number of materials used commercially in the UK construction industry are manufactured using materials recycled from post-consumer waste. The design will endeavour to utilise recycled materials with low embodied impacts.



Responsibly Sourced, Certified Timber
The buildings will only use timber from a temperate, well managed source or manufactured from recycled timber waste. Timber certified by the 'Forest Stewardship Council' (FSC) contains a product-specific chain of custody number confirming that the timber used in the manufacture of the product originates from a sustainably managed source. 100% of the timber used to be FSC/PEFC certified.



Zero ODP and GWP Insulation
Preference will be given to insulation materials such as rock wool and mineral wool, which are manufactured to have an 'Ozone Depletion Potential' (ODP) of zero, and low 'Global Warming Potential' (GWP), while still giving consideration to thermal performance and fitness for purpose.



Low solvent / low VOC paints
Paints and other materials with high levels of Volatile Organic Compounds (VOCs) can emit organic compounds long after the building has been completed. These chemicals which are inhaled by the building occupants are considered to be a contributing factor in sick building syndrome, leading to nausea and headaches. The scheme will, as far as possible, use internal materials that have a low solvent / low VOC content.



Zero Formaldehyde MDF
'Medium Density Fibreboard' (MDF) is a timber panel product that can be manufactured with new or recycled timber. Typically, MDF is manufactured using Formaldehyde, which is hazardous to health. However, MDF can be manufactured without the use of Formaldehyde and the development will use zero Formaldehyde MDF as far as practically possible.

3.4 Waste.

3.4.1 **MCC Adopted Policy Summary.**

The following table summarises the adopted MCC policies for waste.

Table 5 MCC policies relating to waste.

Policy Reference		Target
Waste	CS EN19	– Require all developers to identify consistency with the waste hierarchy. – Provide a project waste management plan. – Promote innovation in order to make progress towards a closed loop waste management system. – Provide accessible facilities.
	CS EN20	– Encourage the efficient use of minerals and promote the use of secondary/recycled aggregates, wherever possible as an alternative to primary extraction and identify and safeguard sites for its storage, processing and transfer. (See also Waste Policy EN19.) – Encourage and safeguard the sustainable transport of minerals, including by use of rail, wherever possible. – Ensure that any adverse environmental impacts of storage, processing and transfer on neighbouring uses are minimised.
	CS EN19	– Require all developers to identify consistency with the waste hierarchy. – Provide a project waste management plan. – Promote innovation in order to make progress towards a closed loop waste management system. – Provide accessible facilities.

3.4.2 GM NHS Green Plan.

The following table summarises the actions within the GM NHS Green Plan which are relevant for waste:

Focus Area	Action
Medicines	Ensure all provider Trusts have programmes in place to minimise wasted nitrous oxide and Entonox and share approach.
Supply chain and procurement	Establish a system-level scheme for walking aid collection and refurbishment, and ensure providers have schemes in place.
Food and nutrition	Ensure all providers have programmes in place to tackle food waste and facilitate shared learning.

3.4.3 Approach.

Operational Waste Management Strategy

A strategy [Northern Pathology Operational Waste Strategy 250731] has been produced covering healthcare and non-healthcare waste streams, setting out how the environmental impact of waste production will be minimised through the provision of appropriate segregation and collection arrangements.

The operational waste produced is holistically managed by the established waste management arrangements of the wider hospital site, of which this site forms a small part. This approach is not proposed to be altered.

The proposal is that refuse is removed from the proposed building to an external bin store on the adjacent service road, from where it can be removed to the main hospital refuse processing point.

Construction waste management.

A construction environment management plan has been developed by Renaker, setting out the strategy to minimise the environmental impacts of the construction process. This strategy includes predicting waste types and volumes, plus waste segregation and waste collection proposals.

The selection of materials will also consider end of life and recyclability. Materials that can be salvaged at the end of life will be incorporated wherever possible to reduce the instances of waste produced in the future.

The following opportunities to reduce waste have been identified and will be implemented at the Proposed Development.



Minimisation of Demolition & Construction Waste

The contractor will be required to produce a 'Site Waste Management Plan' (SWMP) to define measures for how to minimise the volume of waste arising from any demolition and all construction activities sent to landfill. Performance of the contractor waste reduction and their environmental impact in this regard will make up an element of tender process.



Off-site Construction

Off-site modular construction will be considered where possible, which would allow less waste to be produced on-site as the construction method takes on a form of an assembly of components. Features may include stair-core components or upper floor elements although further opportunities will be sought through design and construction.



Operational Waste

The Christie Trust operates under the waste hierarchy and prioritises a re-use system to reduce the volume of furniture and other hospital resources entering the waste stream.

Where waste is unavoidable, the buildings will be provided with sufficient bin storage capacity to allow for storage of recyclable and non-recyclable waste streams. The building users will manually transfer waste to central waste storage area where it will be collected and disposed of by the appropriate waste specialists required for this site.

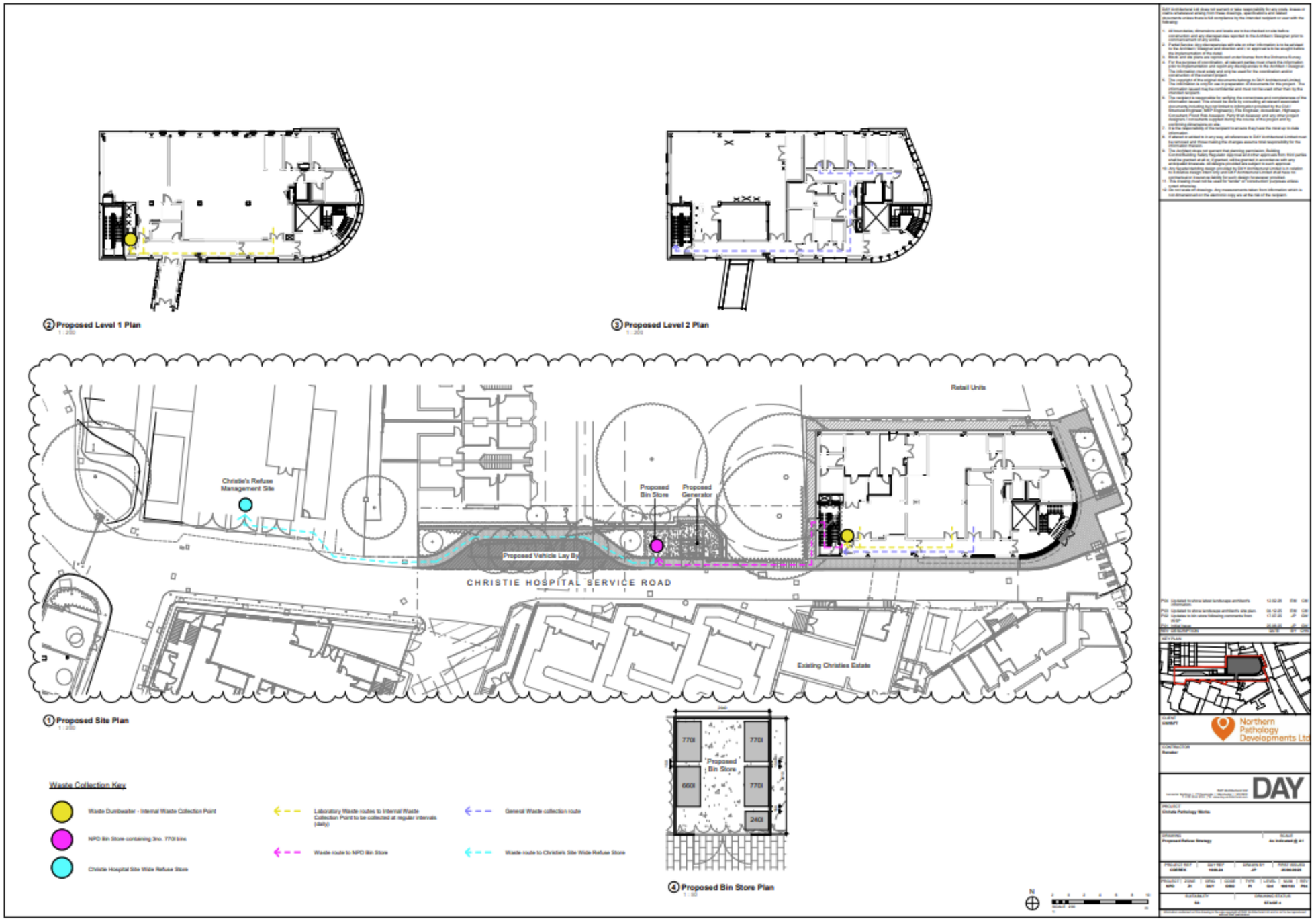


Figure 6 Operational waste strategy diagram © DAY – Drawing reference: NPD-Z1-DAY-G582-PI-Grd-900103_P04_Proposed%20Refuse%20Strategy.pdf

3.5 Transport.

3.5.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for transport.

Table 6 MCC policies relating to transport.

Policy Reference		Target
Transport	CS CC5	– Provide access to public transport and sustainable modes of accessing the Proposed Development. – Promote sustainable modes of transport including walking and cycling. – Provide storage and facilities for cyclists/walkers.
	CS SP1	– Encourage sustainable transport and facilitate sustainable transport.
	CS T1	– Provide suitable alternative to car transportation. – Promote regeneration and access to jobs. – Improve access to transportation services. – Improve pedestrian routes. – Improve access to cycle facilities. – Facilitate modes of transport that are low carbon.

3.5.2 GM NHS Green Plan.

The following table summarises the actions within the GM NHS Green Plan which are relevant for transport:

Focus area	Action
Travel, transport and air quality	– Support all trusts to have a healthy travel plan in place and develop a healthy travel plan for NHS GM Integrated Care. – Promote low carbon travel options to staff via: a staff / business travel portal, cycle-to-work leads embedded in every trust/primary care network, improved messaging, and a travel buddy system, tied in with the 'Live the NHS' values. – Collaborate with local authorities, providers and other partners to review staff travel behaviours and explore incentivising sustainable alternatives such as shared car use/mobility opportunities, car clubs, shorter journeys, reimbursement for grey fleet activity and public transit use. – Baseline current and planned provision of secure cycle parking at all healthcare sites (including primary care) and develop an improvement plan, including guidance on funding.

3.5.3 Approach.

Access to sustainable transport options.

The site location allows easy access to all transport modes, including safe routes to those of lowest environmental impact; walking, cycling and public transport. The transport statement [Item 08 - Northern Pathology Department - Transport Statement -Final] identifies a wide range of amenities are also within walking distance of the site.

It is anticipated that around half of building users will arrive on foot, by bike or via public transport given the local public transportation links close by and existing cycle facilities. Car parking is provided within the hospital campus.

Promotion of sustainable transport options.

The promotion of sustainable transport choices is managed holistically by the established Green Travel Plan for the wider hospital site, of which this site forms a small part. This plan is considered to be of high quality and the Proposed Development does not impact this plan. The Proposed Development will facilitate the decant of other existing facilities at the Christie Hospital in Withington and so there will be no net increase in trips to the Christie Hospital in Withington as a result. Policy items requiring improvements to cycle provision etc. are not felt to be necessary to act upon, given the existing high performance.

Under the Christie's commitment to sustainable development, a Green Travel Plan has been produced; this has been a live document since 2014. The measures within the Green Travel Plan, which are relevant to the Proposed Development, have been outlined in the development's Travel Statement which will be submitted in support of this application. The measures are as follows:

- Membership of the National Performance Advisory Group (NPAG) NHS Car Parking and Travel Planning Network;
- Membership of the NPAG NHS Sustainable Leads Network;
- Membership of the GM Walking Voice Steering Group;
- Appointing a travel plan co-ordinator;
- Promoting a sustainable travel policy;
- Partnership with Transport for Greater Manchester (TfGM);
- Meetings with Manchester City Council (MCC);
- Neighbourhood Engagement Forum;
- Sustainable Development Committee; and
- Travel and car parking group.

It is worth acknowledging that an increase in traffic to the site is to be expected during the construction phase. This is assessed within the Transport Statement and the Construction Traffic Management Plan and will be mitigated through appropriate traffic management and a contractor parking strategy to be provided prior to the commencement of demolition or construction works.

3.6 Pollution.

3.6.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for pollution.

Table 7 MCC policies relating to pollution.

Policy Reference		Target
Pollution	CS DM1	– Effects on amenity, including privacy, light, noise, vibration, air quality, odours, litter, vermin, birds, road safety and traffic generation. This could also include proposals which would be sensitive to existing environmental conditions, such as noise.
	CS Policy EN14	– Limit the risk and impact of flooding. – Limit increases in surface water runoff.
	CS Policy EN17	– Ensure no decreases to water quality. – Minimise surface water runoff. – Open any culverted watercourses.
	SPDPG Section 4.9 (Superseded)	– Provide SUDS to management surface water runoff. – Minimise increases in impermeable surfaces. – Prepare FRA for areas at risk of flooding.

3.6.2 Approach.

Building services plant will be selected based on efficient and ultra-low emissions of NOx SOx and COx (where applicable), and will not substantially contribute to local air pollution. Air Source Heat Pumps and Photovoltaic Cells are the proposed energy sources for the development. No gas combustion devices will be installed on site thereby contributing significantly towards the aims of the Greater Manchester Clean Air Plan.

Noise pollution from the fixed building services plant has been assessed by an acoustic consultant. Suitable acoustic insulation measures have been proposed to ensure the noise emissions from plant equipment does not exceed the noise limits proposed by Sandy Brown.

The following measures to control pollution have been identified and will be implemented:



Light Pollution
Potential sources of light pollution as a result of the new build will be mitigated through measures such as aiming to install automatic lighting which switches off between 23:00 and 7:00, unless used for safety, security and clinical purposes.



NO_x Emissions & Air Quality
To minimise potential air quality effects, the scheme will utilise a strategy which mitigates the need for onsite combustion plant and will help to minimise emissions of Nitrous Oxide (NO_x) and Particulate Matter (PM). Air Source Heat Pumps and Photovoltaic Cells will act as the key energy sources in the Proposed Development. Ventilation systems will be used to manage pollutants in the indoor environment. Heat recovery will help reduce annual heating energy with no impact on the air quality of the incoming fresh air.



Waste Storage
Adequate waste storage facilities will be provided with capacity to allow storage of non-recyclable and recyclable waste, preventing odour pollution from the site. Further information is set out within the Operational Waste Management Strategy submitted in support of the planning application.



Noise impacts
During Construction: Noise and vibration impacts are planned to be mitigated through a combination of measures including modern machinery, training, policy, planed timing of activities, restricted hours of working and acoustic screens where appropriate.

In operation: Noise impacts have been assessed. Acoustic insultation measures have been proposed to ensure the noise emissions from plant equipment does not exceed the established noise limits.

3.7 Ecology and Biodiversity.

3.7.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for ecology and biodiversity.

Table 8 MCC policies relating to ecology and biodiversity.

Policy Reference		Target
Ecology & Biodiversity	CS EN9	– Encourage green infrastructure where possible.
	CS EN10 / EN11 / EN12	– Maintain levels of open, sports and recreation spaces.
	CS EN13	– No impact on the Green Belt.
	CS EN15	– Maintain or enhance sites of biodiversity and geological value. – Identify and implement opportunities to enhance, restore or create new biodiversity.

3.7.2 GM NHS Green Plan

The following table summarises the actions within the GM NHS Green Plan which are relevant for ecology and biodiversity:

Focus area	Action
Estates and facilities	Develop a Sustainable Buildings Policy for NHS GM Integrated Care to ensure that all opportunities to reduce the carbon impacts of the NHS estate are maximised – including both new build and retrofitting. For example: - Ensure a 10% biodiversity net gain in new developments from 2019 baseline
Green space and biodiversity	Actively encourage healthcare providers to develop and enhance incidental green spaces and implement small biodiversity measures such as tree planting, pocket parks, bat/bird boxes and beekeeping programmes, identifying relevant funding pots wherever possible.

3.7.3 Approach.

Existing situation.

The site comprises an existing temporary building, hardstanding, vegetated garden, scrub and scattered urban trees. Existing habitats and flora, potential bat activity, potential bird activity have been analysed and are considered to be of negligible ecological importance. The urban trees present are considered to be of local ecological importance.



Figure 7 Indicative red line boundary extracted from Tyler Grange ecology report. Existing building, hardstanding and vegetated area clearly visible.

Proposals.

The following measures relate to ecology and biodiversity have been included in the project:

Habitats and Flora

- Small area of existing habitat lost (low ecological importance).
- A majority of the existing trees will be retained.
- New trees, hedgerow shrubs and grassland are proposed.

Protected and Notable Species

- Impacts on bats mitigated through implementation of CEMP.
- Bat boxes are proposed to be incorporated in the scheme to support roosting in the future.
- Works will be timed to avoid the bird nesting season.
- In addition to new habitat creation, bird boxes are proposed to be incorporated to increase nesting opportunities.

Biodiversity Net Gain

A proactive approach to BNG has been taken. Though low-quality existing habitats will be removed during the development, with the majority of the urban trees retained, new habitats will be created surpassing the minimum BNG improvement requirement of 10%.

The current proposals will increase habitat units by 24.06% and increase hedgerow units by 21.5%. Further details are provided in the Ecological Impact Assessment and the Biodiversity Net Gain Assessment, submitted in support of the application.

3.8 Community.

3.8.1 MCC Adopted Policy Summary.

The following table summarises the adopted MCC policies for community.

Table 9 MCC policies relating to community.

Policy Reference		Target
Community	CS EN1	– Design facilities that will fit the local character of the development site.
	CS EN10 / EN11 / EN12	– Maintain levels of open, sports and recreation space.
	CS EN13	– No impact on the Green Belt.

3.8.2 Approach

The project team aims to engage with the local community throughout design, construction and operation to deliver a sustainable development, built for purpose.

The Proposed Development has engaged with communities and stakeholders in a meaningful and transparent manner. The proposal has been discussed at three Christie Neighbourhood Forum meetings, which were attended by members of the local community and the Councillors from the local and surrounding Wards. The feedback received throughout this process of consultation has been considered by the Applicant and responded to within the Statement of Consultation submitted in support of this planning application.

The following measures for community engagement and facilities have been identified for further consideration:



Local Employment
The scheme will seek to boost the local economy by using local business and suppliers wherever possible. The team has been encouraged to prepare a sustainable procurement plan for the development that will identify ways to sustainably responsibly and locally procure.



Improving Existing Sites
The development will re-vitalise the area and improve the quality of both townscape and public realm, making efficient use of land in this location.



Considerate Construction Scheme
The contractor will be required to operate under the Considerate Constructors Scheme to ensure good neighbourliness and environmental awareness during construction. The contractor will be required to achieve a best practice score under the assessment.

The Proposed Development will look to minimise construction related disruption in alignment with BREEAM Man 03. Aim to deliver 'good management' and reduce risks associated with construction, therefore protecting the community.

4. Conclusion

This document has summarised the applicable environmental policies and the responses made to these by the design team for the proposed development.

The approaches taken respond positively to the applicable legislation across all relevant environmental issues, in order to mitigate environmental impacts.

HOARE LEA

JAMES ROBB
SENIOR ASSOCIATE

+44 141 471 0025
jamesrobb@hoarelea.com

HOARELEA.COM

McLellan Works
3rd Floor
274 Sauchiehall Street
Glasgow
G2 3EH