

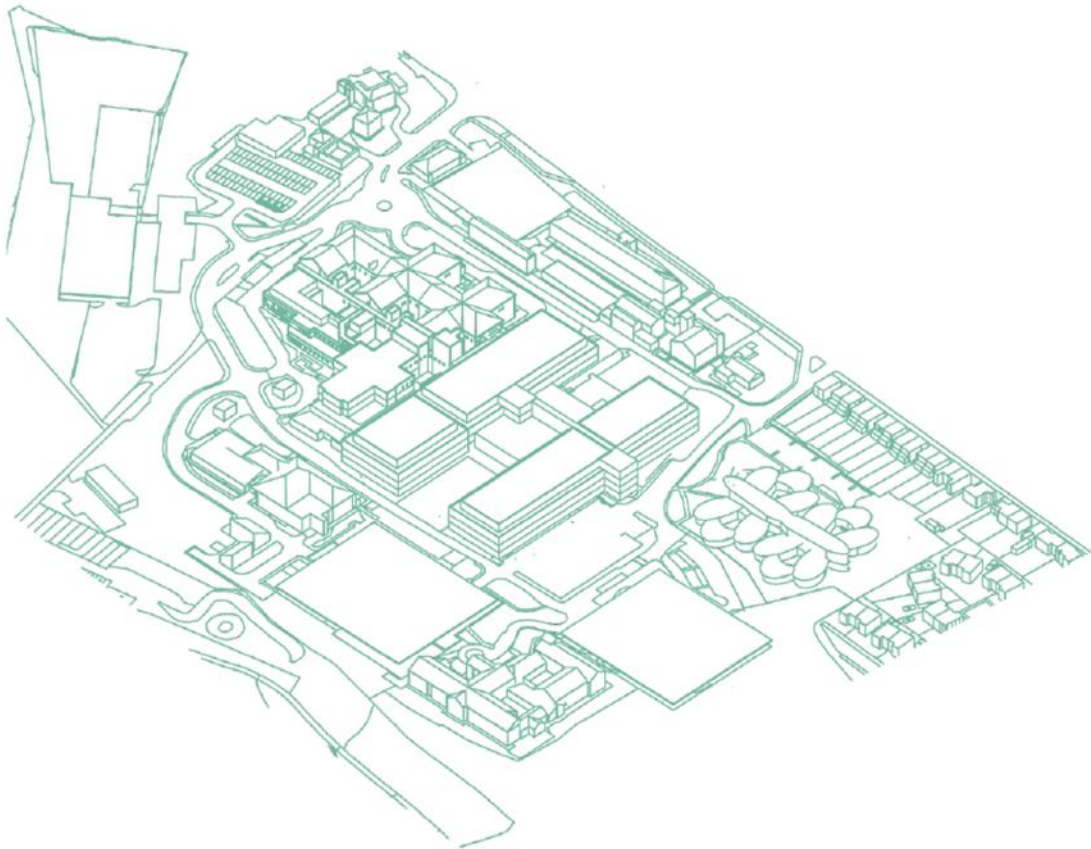
Northern Care Alliance NHS Foundation Trust

Fairfield General Hospital Proposed Temporary Car Park

Planning Statement Including Non-Designated Heritage Assets Statement and Crime Impact Statement

Reference: 292852-00

Rev 1 | 18 July 2024



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Ove Arup & Partners Limited
6th Floor 3 Piccadilly Place
Manchester
M1 3BN
United Kingdom
arup.com

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		Prepared by Name Signature
		Checked by
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1. Introduction

This report has been prepared by Ove Arup and Partners Ltd (Arup) on behalf of Northern Care Alliance NHS Foundation Trust (NCA) to support a retrospective planning application for the development of a temporary car park with 97 car parking spaces at Fairfield General Hospital, Bury, with associated access, footpaths, boundary treatments, lighting and landscaping.

The application was submitted to the Local Planning Authority, Bury Council, via the Planning Portal and comprises the following documentation:

- Planning application forms and certificates;
- Existing and proposed scheme plans
- Planning Statement
- Transport Statement
- Lighting Scheme

1.1 Structure of this Report

This Planning Statement provides a summary of the application and supporting documents. The report is structured under the following headings:

- Background;
- Site and Surrounding Area;
- Proposed Development;
- Planning Assessment;
- Development Management Considerations;
- Non-Designated Heritage Statement;
- Crime Impact Statement; and
- Summary and Conclusions.

The statement concludes that the development is in full compliance with planning policy and should be supported by Bury Council.

2.2 Planning History

A search of Bury Council's planning applications register has identified 8 applications relevant to the site locations within the past 5 years:

- Ref. No: 70502 – Installation of a generator compound containing 2 no. generators and 2 no. fuel tanks with surrounding fence.
- Ref. No: 69880 – Prior approval for proposed demolition of existing two storey residential accommodation blocks, nos. 54, 55, 56 and 57. Approved on 4th August 2023.
- Ref. No: 69513 – Erection of a new single storey ED modular unit extension. Approved on 7th December 2023.
- Ref. No: 66815 – Erection of a facility for cold water booster tanks containing 2no. 125m³ water tanks, booster units and associated external works. Approved on 21st September 2021.
- Ref. No: 66197 – Installation of a VIE Compound containing a liquid oxygen vessel and two ambient vaporisers in order to supply medical oxygen to the hospital, perimeter security fencing and works to site and access. Approved on 12th February 2021.
- Ref. No: 65466 – Extension at level 03 built on the existing flat roof to the South. Approved on 24th June 2020.
- Ref. No: 65385 – Link bridge at first floor level to connect Wards 24 and 25 to the main hospital street corridor. Approved on 30th June 2020.
- Ref. No: 62511 – Construction of a car park and associated access, footpaths, boundary treatments, lighting columns and landscaping. Approved on 6th June 2018.

All the applications above were proportionate to the site and did not result in an adverse impact to the quality of the site. Application no. 69880 was the prior approval for the demolition of former nurses accommodation buildings on site, and no. 69513 was the Phase 1A work of the wider masterplan strategy.

2.3 Relevant Designations

The site is located within Flood Zone 1 (low risk of flooding).

The site sits in a coal mining reporting area. Mine entry, abandoned mines catalogue a development high risk area, surface coal resource areas, mine entry potential zone of influence, and coal outcrops are present in the wider site area. The site partially intersects with reported boundaries of abandoned mines catalogue, development high risk area, surface coal resource areas, and coal outcrops, but does not have significant impact on the site due to lack of intrusion.

The site is not located within a Conservation Area and is not located in close proximity to any listed buildings that would be impacted. The site does not contain any Tree Preservation Orders and is not allocated in the Local Plan.

The Hospital has been identified within 'Topic Paper 11' for the new emerging Local Plan as a critical service that will be encouraged to expand and diversify.

3. Proposed Development

A retrospective planning permission is sought for the development of a temporary car park with 97 parking spaces. 5 trees will be planted in the area marked 'soft landscaping A' on plan no CPC303 B103. Another soft landscaping area will have bark chippings placed and a 600mm high timber knee railing will be installed around the perimeter of the site (see figure 2). The car park will be primarily allocated for staff which will free up space for patients and visitors elsewhere on site.

3.1 Purpose for Development

The development is primarily to alleviate parking pressure at Fairfield Hospital providing much needed additional staff parking provision within the hospital. The lack of parking has had the knock-on effect of causing on-street parking within the site which is often on double yellow lines and has created problems for safe circulation and blue light access around the site. Additionally, the increased capacity of health care facilities and hospital visits at Fairfield Hospital have added pressure to the limited car parking spaces within the existing hospital ground, which prompted the need for the development of a temporary car park.

3.1.1 Access.

The site is accessed from a new priority access to the west of the existing car park. It adjoins the one-way system northbound to the junction of B6222 Rochdale Old Road. The car park will be accessed from a new access to the south of an existing staff car park. Due to its location, it is anticipated that vehicles will arrive from the main site access and depart via the one-way system to the exit-only access with the B6222 immediately north of the site.

3.2 Scale and Design

Figure 2 below shows the arrangements for the temporary car parking deck with 97 parking spaces. As mentioned in section 2.1 above, the car park itself has an area of 2250sqm whilst the site including access and landscaping areas makes up approximately 3700sqm. The car park is made up of MOT type 1 (crushed gravel stones that form a layer for road surfaces) at 200mm on a breathable membrane resulting in an all-natural soakaway. Lighting shall be placed around the car park as detailed in the submitted lighting scheme.

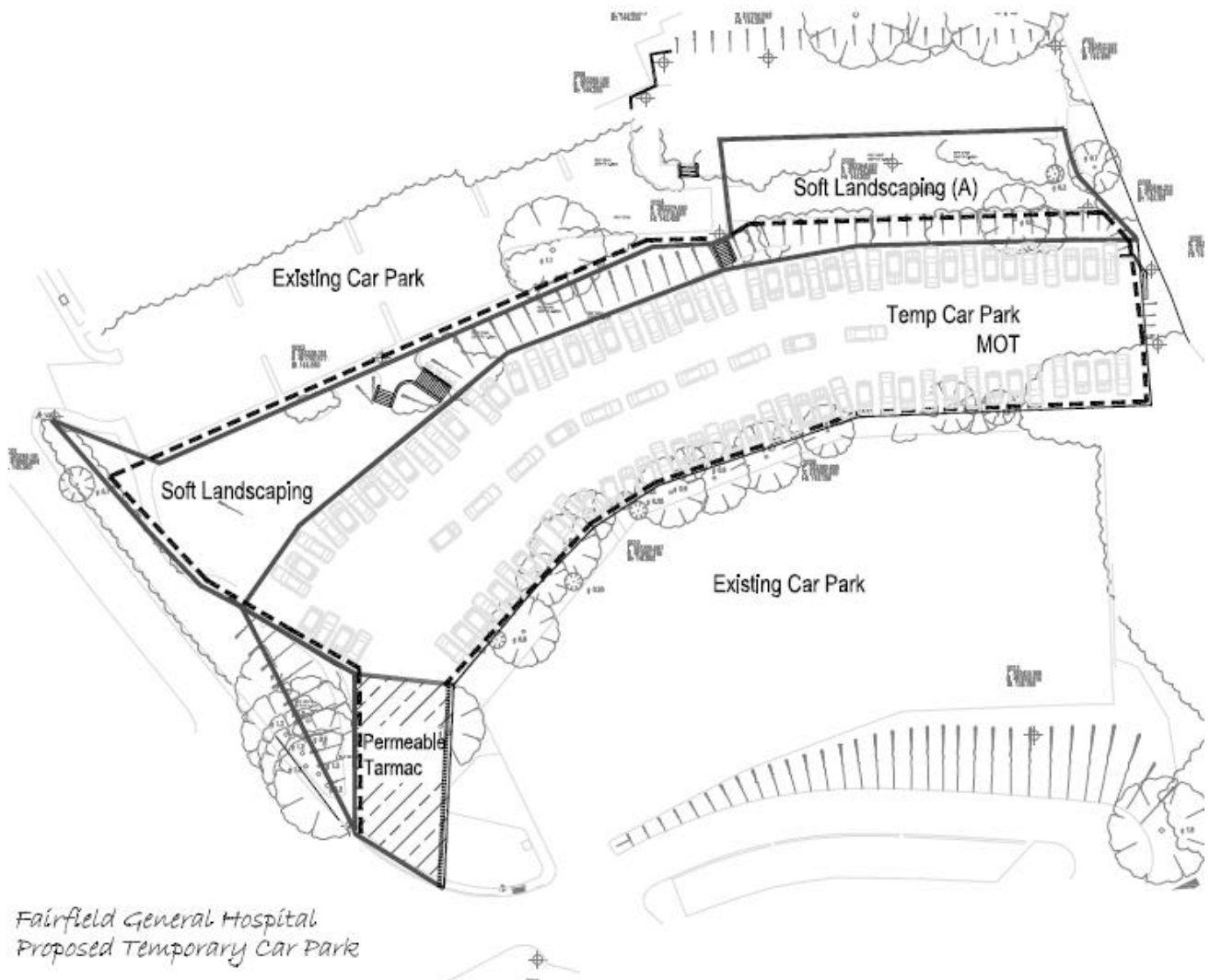


Figure 2 Temporary car park arrangements

4. Planning Assessment

This section provides an assessment of the proposal against relevant national, regional and local planning policies. A summary of the relevant policy documents is provided, followed by an assessment of the principle of development and detailed development management matters.

4.1 National, Regional and Local Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Bury's Development Plan currently consists of 4 parts, although only the Places for Everyone Joint Development Plan (PfE) and the Unitary Development Plan (UDP) will be discussed here.

The Places for Everyone Joint Development Plan was adopted on 21st March 2024. The PfE is a regional plan that has been produced by the Greater Manchester Combined Authority as a long-term plan of nine Greater Manchester districts. It provides strategic planning policies and allocations across nine Greater Manchester Local Authority areas, including Bury. The PfE focuses on strategic issues at a regional scale, and in the case of this planning application, healthcare.

The Unitary Development Plan was adopted February 1997, and since the adoption of PfE, the Council is now working to replace the adopted UDP with the Bury Local Plan. Bury's Local Plan will provide a more detailed set of locally-specific planning policies to complement PfE. As an early stage in the preparation of the Local Plan, Bury invited comments on what the Local Plan ought to contain, the scope of the Integrated Appraisal and issued a Call for Sites over a six-week period from 25 March to 6 May 2024. Until the new Local Plan is produced the UDP will continue to be used to make planning decisions. Appendix A of PfE contains a list of replaced District Local Plan Policies and as such, only the replacement policy within PfE, will be used to assess the development within this Planning Statement.

The NPPF states that Local Authorities are required to have up-to-date local plans. For decision making where the local plan is outdated, decisions should be made using policies set out in the NPPF. Since the UDP is over 20 years old, the NPPF generally takes precedence over the policies outlined in the UDP.

The National Planning Policy Framework 2023 (NPPF) is a material consideration in the determination of planning applications in England. The NPPF sets out the government's planning policies for England and how these should be applied, providing a framework within which locally prepared plans can be produced.

The following sections provide an assessment of the principle of development followed by detailed development management matters.

4.2 Principle of Development

The following principles of development are considered in relation to planning policy, with detailed considerations set out in the following section.

The application seeks retrospective planning permission for the development of a temporary car parking deck consisting of 97 parking spaces within the existing hospital grounds.

National Planning Policy Framework

Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development. For decision-taking this means:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

The proposal accords with Paragraph 97 of the NPPF, which seeks to ensure that planning policies and decisions support the delivery of local strategies to improve health and well-being, with consideration of the location of community facilities.

The proposal is supported by Paragraph 100 of the NPPF, which states that Local Planning Authorities should work proactively and positively to ensure faster delivery of public service infrastructure, such as hospital facilities.

The proposal accords with Paragraph 127 of the NPPF, which states that Local Planning Authorities should support proposals to make more effective use of sites that provide community services, such as hospital facilities, provided this maintains or improves the quality-of-service provision.

Furthermore, according to Paragraph 225 of the NPPF, due weight should be given to existing policies within the Local Plan according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

Places for Everyone

The proposal is supported by Policy JP-S1 (Sustainable Development), which states that development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

The proposal also accords with Policy JP-P6 (Health), which supports the reduction of health inequality through new development, maximising health and wellbeing and improving health facilities through the provision of new developments, continued enhancement and successful operation of hospitals and greater integration of health and social care. The installation of this car park will facilitate the everyday running of the hospital contributing to a more efficient service overall as detailed in section 3.1 above.

Bury Unitary Development Plan

The majority of relevant policies within the Bury UDP have been replaced by new policies set out in PfE as assessed above and are therefore not considered for this planning assessment.

Bury Council's Development Control Policy Guidance Note 11 (Parking Standards in Bury) does not set out standards for hospitals but suggests that they determined on a site-by-site basis.

Development Control Policy Guidance Note 3 (Planning Out Crime in New Development) includes guidance on outdoor parking areas. It promotes overlooking from the road, clear circulation routes, good illumination, quality pedestrian routes, minimal access routes, and defined boundaries.

5. Development Management Considerations

This section provides an assessment of the development against the following development management considerations:

- Design and Amenity;
- Drainage;
- Biodiversity Net Gain;
- Crime Prevention and safety; and
- Highways and Transportation.

These are addressed in turn below.

5.1 Design and Amenity

The NPPF places significant emphasis on the importance of good design in achieving sustainable development. Paragraph 135 seeks to ensure that developments will function well and add to the overall quality of an area over their lifetime, are visually attractive as a result of good architecture, optimise the potential of a site and create places that are safe, inclusive and accessible.

Paragraph 135 states that developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change and that developments should be designed with a high standard of amenity for existing and future users.

Policy EN1 of Bury's UDP states that the Council will seek to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment. This Policy has now been replaced by Policy JP-P1 of PfE, which suggests that new developments should aim to create places that are distinctive, visually stimulating, socially inclusive, resilient, adaptable, durable, resource-efficient, safe, functional, convenient, and well-connected.

Policy CF1/1 of Bury's UDP states that location of new community facilities should consider the impact on residential amenity and the local environment.

The scale, design, access and materiality has been outlined in sections 3.2 above. The development has been carefully designed ensuring it fits into the character of the surrounding area and buildings. The temporary car park is designed to fit within the existing features and setting of the surrounding hospital ground and is located immediately adjacent to an existing car park. The lighting scheme has been designed in a way to reduce the impact upon neighbouring properties as much as possible.

5.2 Drainage

Paragraph 173 of the NPPF states when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Policy JP-S4 (Flood Risk and the Water Environment) of PfE states that developments are expected to manage surface water runoff through sustainable drainage systems and as close to source as possible. This policy has replaced Policy EN5 (Flood Protection and Defence) and EN5/1 (New Development and Flood Risk), and partially replaced EN8 (Adaption to Climate Change) and EN14 (Flood Risk) of Bury's UDP.

Policy JP-P1 (Sustainable Places) of PfE suggests that all development should be supported by critical infrastructure, such as drainage, wherever appropriate.

The site sits within Flood Zone 1 and has been laid with MOT Type 1 at 200mm on a breathable membrane as detailed in section 3.2. This would be a permeable material that would absorb the majority of surface water. Any surface water would run off into existing drains within close proximity of the site. Overall the proposal would not increase the risk of flooding to what was on site previously, and any surface water would be sufficiently managed by the surface material used.

5.3 Biodiversity Net Gain

Paragraph 158 of the NPPF suggests that plans should take a proactive approach to mitigating and adapting to climate change, including taking into account the long-term implications for biodiversity and landscapes.

Paragraph 180 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Developments should help to improve local environmental conditions where possible.

Paragraph 186 of the NPPF suggested that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where appropriate.

Policy JP-G8 (A Net Enhancement of Biodiversity and Geodiversity) of PfE states that a net enhancement of biodiversity resources will be sought, where developments will be expected to avoid significant harm to biodiversity and achieve a measurable net gain in biodiversity of no less than 10%. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process. This policy has replaced Policy EN6 (Conservation of the Natural Environment) of Bury's UDP.

Owing to this proposal being retrospective, BNG is not required as set out in Paragraph: 003 Reference ID: 74-003-20240214 of the Governments' guidance on BNG¹. Notwithstanding this, there will be a number of landscaping and planting additions around the peripheries of the site that will enhance biodiversity and the overall setting.

5.4 Crime Prevention and Safety

Paragraph 135 of the NPPF advises that places should be safe, inclusive, and accessible. In addition, the paragraph states that the design of development should ensure that crime and disorder, and the fear of crime do not undermine quality of life or community cohesion or resilience.

Policy JP-P1 of the PfE has also identified safety as a key attribute for placemaking, including by designing out crime and terrorism, reducing opportunities for anti-social behaviour and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster.

The temporary car park development accords with these policies, providing a much-needed service. A Crime Impact Statement is provided in Section 7 to further assess the impact of the development.

5.5 Highways and Transportation

Paragraph 108 of the NPPF states that transport issues should be considered from the earliest stages of developing a scheme proposal, so that:

- The potential impacts of development on transport networks can be addressed;
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
- Opportunities to promote walking, cycling and public transport are identified and pursued;
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;
- Patterns of movement, street, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

Paragraph 114 outlines that it should be ensured that:

- Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- Safe and suitable access to the site can be achieved for all users; and
- Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

In accordance with the NPPF, it is reasonable to conclude that the proposed development would not have a significant or severe residual impact on the surrounding highway network.

¹ <https://www.gov.uk/guidance/biodiversity-net-gain>

Policy JP-C8 (Transport Requirements of New Development) of PfE sets out transport requirements for new developments to deliver high quality, attractive, liveable and sustainable environments, which include the following aspects that are considered relevant:

- **Connectivity and permeability:** prioritising safe and convenient access to the site for all users, ensuring that the layout, design, and landscaping of development prioritises sustainable transport modes, and provide safe, secure, and attractive access to local services and facilities for pedestrians, cyclists and people with a disability, that are both visually and physically connected to the site and surrounding built environment.
- **Design:** Reduce the need to travel by ensuring that community facilities, services and amenities are provided within the site or within walking distance of new development.
- **Parking Infrastructure:** Making adequate car parking provision, including for disabled drivers and passengers, ensuring that car parking provision is well integrated and unobtrusive, incorporating enough secure and covered cycle parking to meet long-term demand in a convenient location and provide associated facilities where appropriate.
- **Access and Servicing:** Providing designated pick-up/drop-off points for taxis and other demand-responsive transport services where appropriate.
- **Construction Management:** Ensuring Construction Management Plans are produced for developments, where appropriate, to mitigate construction logistics and environmental impacts including air quality and noise on the surrounding area and encourage sustainable deliveries.
- **Transport Assessments:** Planning applications will be accompanied by a Transport Assessment / Transport Statement and Travel Plan where appropriate, in order to assess impacts and determine the most appropriate mitigation on the SRN and local transport network.

A Transport Statement (TA) has been undertaken to support this application. The TA has assessed the local highway network, on-site parking, personal injury accident history, and a highway impact assessment. Engagement was sought with Bury Highways but no response was received prior to submission.

The TA concludes that due to known parking outside of existing car parks (and parking taking place outside unallocated bays within existing car parks) it is anticipated that in reality the number of new trips would be small; the overwhelming majority of movements at the temporary car park are already taking place to the Fairfield General site. It should also be considered that arrivals and departures from the site will be split between the main site access and the one-way egress onto the B6222. This would further lessen the impacts of the proposed developments at the site junction and the adjacent highway network.

On the basis of this analysis it is considered that the temporary car park would have a minimal impact on the operation of the surrounding highways network and accords with JP-C8 of PfE and the relevant sections of the NPPF outlined above.

6. Non-Designated Heritage Assets

The Bury Local List identifies the former Bury Union Workhouse (also known as the Redvales workhouse or Jericho Institution) as a Non-Designated Heritage Asset (NDHA). This covers a number of buildings located within the Fairfield Hospital grounds and as such merits conservation. This statement shall assess how the proposal relates to the NDHA.

The first Former Bury Union Workhouses were built in 1775. A new workhouse was opened at Jericho in 1857 and was renamed the Jericho Institution in 1929. In 1948, the site as a whole became Fairfield Hospital and newer buildings have since been erected around the workhouses to form the existing hospital. Of relevance to the application site, Figure 3 below is a map from 1894. The distorted 'H' shaped building to the right was a former workhouse and today forms wards 29 and 30 and the Pennine Care occupied children's outpatients (see figure 3 and 4). The building is built of natural stone with a traditional slate roof and has been modernised externally with UPVC windows, doors and extensions.

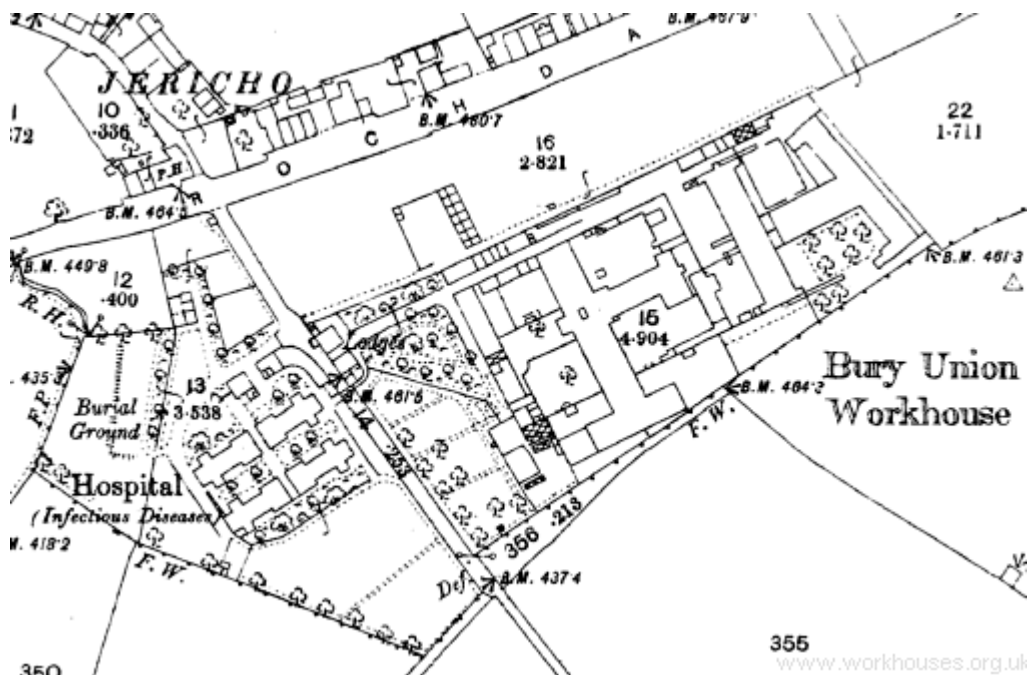


Figure 3 showing the Fairfield Hospital site circa 1894. The 'distorted H shaped building represents a former union workhouse. Source <https://www.workhouses.org.uk/Bury/>



Figure 4 showing the front elevation of the 'distorted H shaped building'.

Bury's emerging Local Plan includes Policy Direction BH6 which focuses on NDHAs. It proposes that the Local Plan should include a policy that seeks to ensure that, in considering proposals that have the potential to affect non-designated heritage assets contained on the 'Local List', the Council should make a balanced judgment taking account of the potential harm and benefits arising from the proposal. This concurs with Paragraph 209 of the NPPF which sets out that the effect of an application on the significance of a non-designated heritage asset this harm should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets of which there are none within close proximity of the site.

There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. It is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.

The original ‘distorted ‘H’ shaped’ workhouse is located approximately 10-15m to the west of the site, but it is recognised that a car park of this nature and scale would not have an impact that would be detrimental to its setting.. As outlined in section 5.1, the fits into the character of the surrounding area and buildings. It is not considered that the development presents any harm to the NDHA workhouses in the vicinity of the site.

7. Crime Impact Statement

The site is located within the Fairfield General Hospital ground. Given the nature of the development, minimising car crime and threats to staff and visitors’ personal safety is crucial.

The location of the temporary car park has good natural surveillance from the surrounding footpaths, dwellings and roads along its northern and western boundaries. The site also has heavy vegetations to the east which blocks entry from outside the hospital. The southern boundary of the site is immediately adjacent to an existing car park, where the installation of the temporary car park will not significantly alter the features or setting of the area, whilst natural surveillance from the south will be enhanced by a new access next to the existing access of this large car park.

The development includes visually permeable boundary treatments along with 5no. high lighting columns. The Lighting Scheme shows the proposed lighting design will provide appropriate levels of lighting across the site aiding visibility and reducing fear of crime. Site security regularly patrol the site and the site will be within view of existing CCTV cameras on site.

8. Summary and Conclusions

This report has been prepared by Ove Arup and Partners Ltd (Arup) on behalf of Northern Care Alliance to support a retrospective planning application for the development of a temporary car park consisting of estimated 97 car parking spaces at Fairfield General Hospital.

The proposal is considered to be in full accordance with national and local planning policy, and should therefore be approved by Bury Council for the following reasons:

- The principle of development adheres to the NPPF, PfE and Bury Council’s Unitary Development Plan policies by supporting the improvement of healthcare facilities at Fairfield General Hospital.
- The temporary car park development will alleviate the existing car parking pressure at Fairfield Hospital and support the healthcare of local patients.
- The proposal accords with the NPPF, which seeks to ensure that established services are able to develop and modernise and are retained for the benefit of the community (Paragraph 97), and which states that Local Planning Authorities should work proactively and positively to ensure faster delivery of public service infrastructure, such as hospital facilities (Paragraph 100).
- The proposal is non-intrusive and will provide benefits for the long-term operation of Fairfield Hospital, which will then provide socially sustainable benefits at the regional, local and site scales.

It is therefore considered that the application should reasonably be approved by Bury Council in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.