

Extraordinary Development Control Committee



| | | | |
|---|---|--|--|
| Title | Agenda | | |
| Date | Wednesday 30 November 2022 | | |
| Time | 10.00 am | | |
| Venue | Conference Chamber West Suffolk House Western Way Bury St Edmunds IP33 3YU | | |
| Full Members | Chair Andrew Smith Vice Chairs Mike Chester and Jim Thorndyke Conservative Group (11) Carol Bull, Ian Houlder, Andy Drummond, David Palmer, Susan Glossop, David Roach, Brian Harvey, Peter Stevens The Independent Group (4) John Burns, Roger Dicker, Jason Crooks, Andy Neal Labour Group (1) David Smith | | |
| Substitutes | Conservative Group (5) Nick Clarke, Sara Mildmay-White, John Griffiths, David Nettleton, James Lay The Independent Group (2) Richard Alecock, Trevor Beckwith Labour Group (1) Diane Hind | | |
| Interests – declaration and restriction on participation | Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest. | | |
| Quorum | Six Members | | |
| Committee administrator | Helen Hardinge Democratic Services Officer Telephone 01638 719363 Email helen.hardinge@westsuffolk.gov.uk <i>Details of Site Visit overleaf...</i> | | |

A SITE VISIT WILL BE HELD ON TUESDAY 29 NOVEMBER 2022 AT THE FOLLOWING TIME

The coach for Committee Members will depart West Suffolk House at 9.30am sharp and will travel to the following site. All Members of the Committee are encouraged to attend the site visit on the coach in order to allow the Case Officer to undertake the relevant elements of his briefing in-transit and to manage access to the various stopping points.

Planning Application DC/22/0593/HYB - Land at Hardwick Manor, Hardwick Lane, Bury St Edmunds

Hybrid planning application - a. outline application (means of access to be considered) for a new hospital (use class C2) of up to 100,000 square metres and surface and multistorey car park with associated infrastructure, structural landscape buffer, temporary construction compound and demolition of existing hospital buildings. b. full planning application - change of use of Hardwick Manor from a single residential dwelling (use class C3) to health related uses associated with the new hospital (use class C2)

On conclusion of the site visit the coach will return to West Suffolk House by the approximate time of 11.30am.

Development Control Committee

Agenda notes

Subject to the provisions of the Local Government (Access to Information) Act 1985, all the files itemised in this Schedule, together with the consultation replies, documents and letters referred to (which form the background papers) are available for public inspection.

All applications and other matters have been considered having regard to the Human Rights Act 1998 and the rights which it guarantees.

Material planning considerations

- 1. It must be noted that when considering planning applications (and related matters) only relevant planning considerations can be taken into account. Councillors and their officers must adhere to this important principle which is set out in legislation and Central Government guidance.**

- 2. Material planning considerations include:**
 - Statutory provisions contained in planning acts and statutory regulations and planning case law
 - Central Government planning policy and advice as contained in circulars and the National Planning Policy Framework (NPPF)
 - Supplementary planning guidance/documents eg. Affordable Housing SPD
 - Master plans, development briefs
 - Site specific issues such as availability of infrastructure, density, car parking
 - Environmental; effects such as effect on light, noise overlooking, effect on street scene
 - The need to preserve or enhance the special character or appearance of designated conservation areas and protect listed buildings
 - Previous planning decisions, including appeal decisions
 - Desire to retain and promote certain uses e.g. stables in Newmarket.
 - The following planning local plan documents covering West Suffolk Council:
 - Joint development management policies document 2015
 - In relation to the Forest Heath area local plan:
 - i. The Forest Heath Core Strategy 2010 as amended by the High Court Order 2011
 - ii. Core strategy single issue review of policy CS7 2019
 - iii. Site allocations local plan 2019
 - In relation to the St Edmundsbury area local plan:
 - i. St Edmundsbury core strategy 2010
 - ii. Vision 2031 as adopted 2014 in relation to:
 - Bury St Edmunds
 - Haverhill
 - Rural

Note: The adopted Local Plans for the former St Edmundsbury and Forest Heath areas (and all related policy documents, including guidance and SPDs) will continue to apply

to those parts of West Suffolk Council area until a new Local Plan for West Suffolk is adopted.

3. The following are **not** material planning considerations and such matters must **not** be taken into account when determining planning applications and related matters:
 - Moral and religious issues
 - Competition (unless in relation to adverse effects on a town centre as a whole)
 - Breach of private covenants or other private property or access rights
 - Devaluation of property
 - Protection of a private view
 - Council interests such as land ownership or contractual issues
 - Identity or motives of an applicant or occupier
4. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission must be determined in accordance with the Development Plan (see section 3 above) unless material planning considerations indicate otherwise.
5. A key role of the planning system is to enable the provision of homes, buildings and jobs in a way that is consistent with the principles of sustainable development. It needs to be positive in promoting competition while being protective towards the environment and amenity. The policies that underpin the planning system both nationally and locally seek to balance these aims.

Documentation received after the distribution of committee papers

Any papers, including plans and photographs, received relating to items on this Development Control Committee agenda, but which are received after the agenda has been circulated will be subject to the following arrangements:

- a. Officers will prepare a single committee update report summarising all representations that have been received up to 5pm on the **Thursday** before each committee meeting. This report will identify each application and what representations, if any, have been received in the same way as representations are reported within the Committee report;
- b. the update report will be sent out to Members by first class post and electronically by noon on the **Friday** before the committee meeting and will be placed on the website next to the committee report.

Any late representations received after 5pm on the **Thursday** before the committee meeting will not be distributed but will be reported orally by officers at the meeting.

Public speaking

Members of the public have the right to speak at the Development Control Committee, subject to certain restrictions. Further information is available on the Council's website.

Development Control Committee

Decision making protocol

The Development Control Committee usually sits once a month. The meeting is open to the general public and there are opportunities for members of the public to speak to the Committee prior to the debate.

Decision making protocol

This protocol sets out our normal practice for decision making on development control applications at Development Control Committee. It covers those circumstances where the officer recommendation for approval or refusal is to be deferred, altered or overturned. The protocol is based on the desirability of clarity and consistency in decision making and of minimising financial and reputational risk, and requires decisions to be based on material planning considerations and that conditions meet the tests of Circular 11/95: "The Use of Conditions in Planning Permissions." This protocol recognises and accepts that, on occasions, it may be advisable or necessary to defer determination of an application or for a recommendation to be amended and consequently for conditions or refusal reasons to be added, deleted or altered in any one of the circumstances below:

- Where an application is to be deferred, to facilitate further information or negotiation or at an applicant's request.
- Where a recommendation is to be altered as the result of consultation or negotiation:
 - The presenting officer will clearly state the condition and its reason or the refusal reason to be added/deleted/changed, together with the material planning basis for that change.
 - In making any proposal to accept the officer recommendation, a Member will clearly state whether the amended recommendation is proposed as stated, or whether the original recommendation in the agenda papers is proposed.
- Where a member wishes to alter a recommendation:
 - In making a proposal, the member will clearly state the condition and its reason or the refusal reason to be added/deleted/changed, together with the material planning basis for that change.
 - In the interest of clarity and accuracy and for the minutes, the presenting officer will restate the amendment before the final vote is taken.
 - Members can choose to;
 - delegate the detailed wording and reason to the Assistant Director (Planning and Regulatory);
 - delegate the detailed wording and reason to the Assistant Director (Planning and Regulatory) following consultation with the Chair and Vice Chair(s) of Development Control Committee.

- Where Development Control Committee wishes to overturn a recommendation and the decision is considered to be significant in terms of overall impact; harm to the planning policy framework, having sought advice from the Assistant Director (Planning and Regulatory) and the Assistant Director (Human Resources, Legal and Democratic) (or officers attending Committee on their behalf);
 - A final decision on the application will be deferred to allow associated risks to be clarified and conditions/refusal reasons to be properly drafted.
 - An additional officer report will be prepared and presented to the next Development Control Committee detailing the likely policy, financial and reputational etc risks resultant from overturning a recommendation, and also setting out the likely conditions (with reasons) or refusal reasons. This report should follow the Council's standard risk assessment practice and content.
 - In making a decision to overturn a recommendation, members will clearly state the material planning reason(s) why an alternative decision is being made, and which will be minuted for clarity.
- In all other cases, where Development Control Committee wishes to overturn a recommendation:
 - Members will clearly state the material planning reason(s) why an alternative decision is being made, and which will be minuted for clarity.
 - In making a proposal, the member will clearly state the condition and its reason or the refusal reason to be added, deleted or altered, together with the material planning basis for that change.
 - Members can choose to:
 - delegate the detailed wording and reason to the Assistant Director (Planning and Regulatory)
 - delegate the detailed wording and reason to the Assistant Director (Planning and Regulatory) following consultation with the Chair and Vice Chair(s) of Development Control Committee
- Member Training
 - In order to ensure robust decision-making all members of Development Control Committee are required to attend Development control training.

Notes

Planning Services (Development Control) maintains a catalogue of 'standard conditions' for use in determining applications and seeks to comply with Circular 11/95 "The Use of Conditions in Planning Permissions."

Members and officers should have proper regard to probity considerations and relevant codes of conduct and best practice when considering and determining applications.

Agenda

Procedural matters

Part 1 – public

1. Apologies for absence

2. Substitutes

Any member who is substituting for another member should so indicate, together with the name of the relevant absent member.

3. Declarations of interest

Members are reminded of their responsibility to declare any pecuniary or local non pecuniary interest which they have in any item of business on the agenda, **no later than when that item is reached** and, when appropriate, to leave the meeting prior to discussion and voting on the item.

4. Planning Application DC/22/0593/HYB - Land at Hardwick Manor, Hardwick Lane, Bury St Edmunds

1 - 114

Report No: **DEV/WS/22/046**

Hybrid planning application - a. outline application (means of access to be considered) for a new hospital (use class C2) of up to 100,000 square metres and surface and multistorey car park with associated infrastructure, structural landscape buffer, temporary construction compound and demolition of existing hospital buildings. b. full planning application - change of use of Hardwick Manor from a single residential dwelling (use class C3) to health related uses associated with the new hospital (use class C2)

This page is intentionally left blank

Development Control Committee

30 November 2022

Planning Application DC/22/0593/HYB – Land at Hardwick Manor, Hardwick Lane, Bury St Edmunds

Date registered: 6 April 2022 **Expiry date:** 9 December 2022

Case officer: Peter White **Recommendation:** Approve

Parish: Bury St Edmunds Town Council & Horringer cum Ickworth Parish Council **Ward:** Southgate, Westgate and Horringer

Proposal: Hybrid planning application - a. outline application (means of access to be considered) for a new hospital (use class C2) of up to 100,000 square metres and surface and multistorey car park with associated infrastructure, structural landscape buffer, temporary construction compound and demolition of existing hospital buildings. b. full planning application - change of use of Hardwick Manor from a single residential dwelling (use class C3) to health related uses associated with the new hospital (use class C2)

Site: Land at Hardwick Manor, Hardwick Lane, Bury St Edmunds

Applicant: West Suffolk NHS Foundation Trust

Synopsis:

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and associated matters.

Recommendation:

It is recommended that the Committee determine the attached application and associated matters.

CONTACT CASE OFFICER:

Peter White

Email: peter.white@westsuffolk.gov.uk

Telephone: 01284 757357

Background:

The application was submitted to the Local Planning Authority at the end of March 2022. Since it was originally submitted and consulted on there have been two further rounds of consultation following the submission of additional and amended details by the applicant. Those additional periods of consultation were in the months of Aug/Sept 2022 and Oct/Nov 2022.

This application is referred to Development Control Committee because the application is a Major development and is a departure from the Development Plan. The application is recommended for APPROVAL. Bury St Edmunds Town Council support the application but raise transport concerns and seek assurances that part of the current site will not be sold for redevelopment. Horringer cum Ickworth Parish Council have objected to the application raising safety concerns about the main construction compound access.

Proposal:

1. The planning application before the Local Planning Authority (LPA) is a hybrid application including both an outline element and a full element. The full element of the application is for the change of use of Hardwick Manor from a single residential dwelling (use class C3) to health-related uses associated with the new hospital (use class C2).
2. "Means of Access" is the only Reserved Matter that the application seeks. There are 13 access points around the application site which are included in the application. They are as follows;
 - a) The alteration of an existing access to a light controlled junction to serve as the main entrance and exit to the site located centrally in the Hardwick Lane frontage.
 - b) The alteration of the existing main exit from the current site to serve as an entrance and exit for public buses
 - c) Alterations to the pedestrian access located at the eastern end of the Hardwick Lane frontage to serve pedestrians and cyclists.
 - d) The alteration of an informal pedestrian access into and out of Hardwick Heath to a surfaced pedestrian and cycle access located immediately to the north of Wedgewood House.
 - e) The closure to all modes of transport including pedestrians of the existing access which serves Hardwick Manor located at the southern end of Sharps Road.
 - f) The alteration and reuse of a former access located on the western boundary of the Hardwick Manor site opposite the eastern end of Gypsy Lane. The new access here would serve pedestrians and cyclists only.
 - g) The creation of a temporary vehicular access on the western boundary of the Hardwick Manor site which would link the temporary construction compound and the new hospital site. This temporary access would cease use, and the space would be replanted in the first planting season after the new hospital has been opened
 - h) The final accesses would serve the construction compound. One access is an existing field entrance at the western end of Gypsy Lane which will experience minimal alteration save for some differing surfacing to accommodate the extra vehicular traffic. The second access serving the construction compound would be opposite the temporary access

described at no. 7 above. This access would be the main route for the construction workforce on foot and vehicles necessary for transporting materials to and from the new hospital site and used to construct the new hospital. This access will be extinguished, and the land put back to its current condition once the use of the construction compound has ceased.

3. The remaining Reserved Matters of Scale, Landscape, Layout and Appearance would need to be submitted to and approved in writing by the LPA before the development commenced if this outline application was granted consent.
4. The application also seeks outline consent for a new District General Hospital which would be up to 100,000m² in size. The application includes a number of parameter plans which seek to establish a number of limitations on the application including maximum height of the building, location of the new hospital building, amount of the site that will be developed and how public access to parts of the site will be controlled.
5. The parameter plan that sets maximum heights for the proposed hospital shows 4 maximum height zones and these range from 25 metres to 35.5 metres or 80 metres Above Ordnance Datum (AOD) to 95 metres AOD.
6. The application also seeks consent for a multi storey car park which would be located just north of Quince House on the existing Hardwick Lane site and would have a maximum height of 10 metres or 69 metres AOD. The application sets out that the car parking for the overall site would either be delivered utilising the proposed multistorey car park or solely using surface car parking.
7. The application also shows the broad location of internal access roads including a new access road to Hardwick Manor, cycle and footways, car parking, drainage details including retention basins and two areas for structural landscaping to the north and south of the Hardwick Manor site. Finally, the application includes details of how areas of Hardwick Manor will be restricted from public access once the new hospital is opened and what parts of the site development will be limited to in order to minimise harm to areas of ecological importance.

How the application has changed during the lifetime of the application

8. Since the application was first submitted to the LPA earlier in 2022 it has undertaken some significant changes that were necessary to make the application acceptable.
9. The most significant change to the proposal has been the replacement of a proposed new roundabout to serve the site on the Hardwick Lane frontage with that of a light controlled junction. This was to address initial safety concerns raised by SCC Highways in relation to roundabout.
10. Other changes that have been submitted to the application include;
 - a) Reducing where possible the maximum heights of the new hospital
 - b) The introduction of an onsite public bus interchange
 - c) Additional information and amendments to the method used to manage the existing on-site surface water flow.

- d) The removal of part of the existing access to Hardwick Manor to avoid veteran trees and the proposal of a different access to Hardwick Manor
- e) Amendments to the structural landscape areas
- f) Additional modelling information for several key junctions around the town and on the A14.

11. Full details of the additional and amended details received in August and October are detailed below at paragraphs 18 and 19.

Site selection

12. The adopted St Edmundsbury Core Strategy (adopted 2010) allocated Bury West (off Newmarket Road) as a direction of growth around Bury St Edmunds which included a Regional Health Campus. This was included in this allocation after the West Suffolk NHS Foundation Trust (WSFT) worked with the promotor of that site at the time to bring forward an allocation that also included a relief road and 450 dwellings.

13. The proposal for a new hospital has not come forward on the allocated site in the Local Plan. The submission is supported by an Environmental Statement (ES) and that includes a chapter entitled "Project Description & Alternatives". This chapter looks at the alternative sites that the WSFT assessed and the reasons for proceeding with the application site.

Need for the proposal

14. As part of its submission the WSFT has explained the need for the new hospital. The current West Suffolk Hospital (WSH) was designed in the mid-60s and constructed in the early 1970s as one of the 'best buy' (the term used to describe the standardised design of a number of hospitals in the region that were built at that time) hospitals. The building was constructed using precast concrete construction. The central 'spine' of the building and first floor are of traditional normal weight precast concrete construction, with the external roof and wall planks formed from precast reinforced autoclaved aerated concrete (RAAC). All aspects of the main hospital building have a structural function.

15. There are structural defects associated with the RAAC system which have developed over time. The WSFT have been managing the safety aspects of the hospital as built but life expectancy of the current structure is not predicted to last beyond 2030.

Anticipated delivery if planning permission is granted

16. Announced in late 2019 by the UK government, the Health Infrastructure Plan (HIP) was the beginning of a rolling five-year investment plan to upgrade and replace outdated and existing NHS estates across England. This included building new hospitals that can provide modern health facilities and accommodate current systems of care. Originally HIP was split into two phases, with six hospitals being built in the first phase (HIP 1) between 2020-2025, and further hospitals being built between 2025-2030 (HIP 2) to provide a total of 40 new hospitals. Now referred to as the New Hospitals Programme (NHP), WSFT was selected as one of the Trusts which would receive government funding for a new hospital, with a commitment to have the hospital built by 2030. West Suffolk Hospital is classed as a full adopter, which are schemes that will be delivered in the latter half of the decade, adopting ideas and outcomes from the earlier hospital projects already under construction or those due to be built by

2025. However, WSFT is progressing at pace due to the structural problems set out above

Application supporting material:

17.The following documents accompany the planning application:

- Application Forms and Certificates
- Parameter Plans and cross and site section drawings
- Environmental Statement, including amongst other things:
 - Traffic and Travel including Transport Assessment
 - Noise and Vibration Assessment
 - Ground Conditions Report
 - Flood Risk and Water Environment Assessment
 - Landscape and Visual Impact Assessment
 - Biodiversity Assessment
 - Heritage Assessment
- Planning Statement
- Design & Access Statement (including Landscape Design Statement)
- Lighting impact Assessment
- Location Plan
- Proposed Demolition Plans
- Statement of Community Engagement
- Tree Survey and Arboricultural Impact Assessment
- Sustainability Statement

18.The following amendment/additional information were submitted in August 2022:

- Amended representative viewpoints
- Ecology Baseline Report Figures
- Planning Statement
- Ambulance Network Resilience Report
- Environmental Statement Addendum with Appendix
- Car Park Report
- Attenuation Basin Sections
- Ecology Compensation Strategy
- Environmental Colour Assessment
- Amended Design and Access Statement
- Equality Impact Assessment
- Isoline Plan
- Lighting Impact Assessment
- Amended Site location Plan
- Maximum Heights Comparison Drawing
- Net Zero Carbon Supplementary note
- ES Non Technical Summary
- Parameter Plan – Developable Areas
- Parameter Plan – Maximum Developable Heights
- Parameter Plan – Site Access and Movement Proposals
- Parameter Plan – Site Access Points
- Parameter Plan – Structural Landscape Masterplan and Buffer Treatment
- Parameter Plan – Utilities
- Amended Demolition Plan
- Amended Illustrative Masterplan
- Proposed Zones of restricted Access
- Site Sections

- Proposed Structural Landscaping Planting North and South
- Written Scheme of Investigation

19. The following amendment/additional information were submitted in October 2022:

- Covering Letter
- Comparison of existing and proposed cycle/ footway on southern side of Hardwick Lane
- Hardwick Lane footpath sections with transport and tree retention commentary
- Phase 1 Arch Evaluation Report
- Proposed Site Access Junction – Non Technical Summary
- Swept Path analysis of proposed bus interchange
- Swept Path analysis of proposed light controlled junction on Hardwick Lane
- Amended Design and Access Statement
- Structural Landscaping Planting Woodland Mix Northern
- Structural Landscaping Planting Woodland Mix Southern
- Proposed Zones of Restricted Access
- Amended Parameter Plan – Structural Landscape Masterplan and Buffer Treatment
- Amended Parameter Plan – Site Access and Movement Proposals
- Amended Proposed Illustrative Masterplan
- Attenuation Basin Sections
- Northern Buffer Extract
- Response to National Highways
- Response to SCC Highways Authority
- Environment Statement Addendum Revision 1
- Appendix M Autumn 2022 Bat Survey Results
- Appendix C Chapter 5 Traffic and Travel
- Appendix J Parameter Plans

Site details:

20. The application site extends to approximately 54 hectares in size. This includes approximately 6.2 hectares of land to the west of Horsecroft Road and south of Gypsy Lane that would be used for a temporary construction compound during the construction and demolition phase of the project.

21. None of the application site is the Housing Settlement boundary of Bury St Edmunds. The existing health campus, known as Hardwick Lane, which accommodates the existing hospital and other health related buildings is within the West Suffolk Hospital and St Nicholas Hospice allocation as defined in the St Edmundsbury Policies Map Book (adopted Feb 2015). The remaining elements of the application site are both within the Countryside and the Special Landscape Area as defined by the St Edmundsbury Policies Map Book.

22. The Hardwick Manor site has a number of biodiversity designations on it and around it. Almost all of that part of the application site is designated as a Site of Nature Conservation Interest. To the east is Hardwick Heath which is a Local Wildlife Site. Apart from the western tree belt that runs parallel with Horsecroft Road, the rest of the Hardwick Manor site is defined as a Wood Pasture Parkland. During the life of the planning application, it has become clear that much of the Hardwick Manor site is

classified as Irreplaceable Habitat which is discussed in much greater detail at paragraphs 204-225 below. Both the existing and proposed Hospital site and large areas around them benefit from an Area Tree Preservation Order (TPO) that protects all the trees. To the west of the site is the Horringer Court Caves which are designated as a Site of Special Scientific Interest.

- 23.The site is shown on the Environment Agency constraints mapping as being in flood zone one (lowest risk). However, it also shows that there is an area where surface water flooding occurs. This is along the line of the natural valley formation of the landscape and runs generally from the southwest side of the Hardwick Manor site in a northeast direction towards the rear of some of the properties on Sharp Road.
- 24.Currently Hardwick Manor is accessed from the southern end of Sharp Road. The dwelling, walled garden and gates are grade II listed and this heritage designation was confirmed by English Heritage just before the application was submitted. To the west and southwest of Hardwick Manor house is open parkland. To the south and southeast is an area referred to as the arboretum which is characterised by denser woodland blocks.
- 25.Sharp Road is located to the north of the proposed new hospital site. To the south of the proposed hospital site are two residential properties within the curtilage of Hardwick Game Farm. Approximately 110 metres to the south of the construction compound is a grade II listed residential property known as Lodge Cottage.
- 26.To the east of the site is Hardwick Heath with the residential areas of Home Farm Lane and the Nowton Estate beyond. Hardwick Lane and further residential development is located to the north of the existing hospital site.

Planning history:

- 27.On the Hardwick Manor site the following applications have previously been submitted;
 - E/88/2877/P Outline Application - Erection of 13 No. executive style residential properties with construction of estate road – Refused
 - E/98/2069/P Planning Application - Erection of side extension to provide dining area, sitting room and first floor study Approved
- 28.On the current Hospital site there have been numerous applications for new health related buildings, extensions to buildings, car parking areas and other necessary plant for the hospital since the hospital opened in the early 1970's.
- 29.A Masterplan for the Hospital Site was adopted by the council as informal planning guidance in July 2015. This set out a number of potential areas capable of accommodating further growth on the site. This included amongst other things a new car park, a new sterile equipment services and office building and a new hospital staff residence. These and other elements have since been brought forward in accordance with the adopted masterplan.

Representations

30. Bury St Edmunds Town Council (May 2022)

- Bury St Edmunds Town Council wishes to express its in principle support for the construction of a new hospital on the Hardwick Manor site. However, the Town Council has a number of concerns with the outline application that are expressed as objections.
- Environmental and ecological concerns with a potential loss of habitat and wildlife and the impact on the adjacent SSSI site. The Town Council would like to see an improvement to the onsite mitigation and an increased ecological buffer between Hardwick Heath and the hospital site.
- Transport infrastructure objections and the capacity of the surrounding roads and traffic junctions - the Spread Eagle, Cullum Road and Southgate roundabouts. Concerns about the proposed new roundabout where Hardwick Lane meets Vinery Road as this may exacerbate the existing traffic issues and further encourage the use of Gypsy Lane as a rat run.
- Seek assurances that no part of the existing hospital site should be developed for future commercial gain, as residential development or for other uses.

31. Bury St Edmunds Town Council (Aug 2022)

- Bury St Edmunds Town Council recommends the application is refused.
- Note the Trusts commitment to net zero carbon footprint, however, recommend this being imposed as a condition on any approval.
- Trust has expressed its preference for them to retain the estate for any future expansion required to meet clinical needs, however this should be a condition of approval not just a preference.
- Although some highways objections have been addressed, we would request site of a comprehensive transport plan which should include a park and ride facility to alleviate traffic and need for parking.

32. Bury St Edmunds Town Council (Nov 2022)

- Bury St Edmunds Town Council recommends APPROVAL. However, the Town Council seeks reassurance that all sustainable transport options will be considered including a 'park and ride' facility. Further discussions should take place with SCC Highways to discuss 'pinch points' such as the Spread Eagle junction, and a comprehensive transport plan needs to be developed.
- Councillors would also seek assurances that previous hospital car parking land should not be sold for redevelopment.

33. Horringer Cum Ickworth Parish Council May 2022)

- Support the proposal to identify the Hardwick Lane site as the preferred location for the new hospital.
- The parish council recognise that a site compound is an essential requirement during the construction phase and would be difficult to accommodate on the site itself. This being the case, it is considered to be essential that if the Gypsy Lane/Horsecroft Road site is used for this purpose, it be fully and completely restored to its current agricultural use after development has been completed.
- Opposed to the suggested closure of Gypsy Lane after the construction phase.

- Concerns relating to A143/B1066/Gypsy Lane junction during construction phase.
- The application recognises the importance of safer access arrangements for pedestrians and cyclists. To this end, the Parish Council would like a financial contribution to be made by West Suffolk NHS Foundation Trust towards the newly agreed bridleway between Horringer village and Glastonbury Road.
- Hardwick Manor building should be retained on site and that as many trees as possible be protected both during the build and for the future enjoyment of patients, staff and visitors.

34. Horringer Cum Ickworth Parish Council May 2022)

- The Parish Council maintain their objection in relation to traffic management and request that the applicants and the local highway authority look more closely at the impact of the site compound access on traffic movement and highway safety at the A143 and Gypsy Lane junction.
- The drawings illustrate the swept path of an HGV entering and leaving the site compound and rather confirm our concerns relating to conflicting traffic movements at what is, in effect, a complicated staggered junction.
- The exit from south and entry from north paths at A143 and Gypsy Lane appear to be in conflict with traffic in opposing directions. Concerns regarding safety of cyclists at this junction too.

35. Ward Members

No comments were received by local Ward Members during the course of the application.

36. County Council Richard Rout

- Complete support for a new hospital in Bury St Edmunds and my objection is only to these plans as they stand.
- Traffic and highways are an issue.
- To be acceptable, on transport grounds, we need to see firm proposals to upgrade and improve these junctions and or provide an additional access route to the new hospital site which removes strain from Hardwick Lane and Vinery Road.
- The proposed roundabout will encourage traffic down Hardwick Lane, from the direction of Horsecroft Road and Horringer Road.
- The plans as they stand are not suitably ambitious with regard to environmental impacts, mitigations, and biodiversity net gain.
- Concerns around scaling and the view of the site, across the Heath, from Hardwick Park Gardens and Home Farm Lane but appreciate that some efforts have been made to alleviate this.
- I hope the concerns around parking in the area will be addressed going forward when the new traffic regulations orders (TRO's) come into force.
- The applicant must amend these plans to reduce transport impacts and mitigate against environmental damage and moreover, deliver an exemplar approach to biodiversity given the site's sensitivity.

37. Neighbours

38. 3,550 nearby addresses were notified, and approximately 10 site notices posted around the site. 26 representations were received from the following addresses during the first consultation:

- 15 Godolphin Close
- 4 Hardwick Park Gardens
- 18 Hardwick Park Gardens
- 75 Hardwick Lane
- 116 Hardwick Lane
- 20 Hervey Road
- 1 Hickling Drive
- 57 Home Farm Lane
- 74 Home Farm Lane
- 85 Home Farm Lane
- 86 Home Farm Lane
- 92 Home Farm Lane
- 104 Home Farm Lane
- 106 Home Farm Lane
- 74A Horringer Road
- 96 Horringer Road
- 27 Horsecroft Road
- 46 Horsecroft Road
- Horsecroft Hall
- 10 Linton Gardens
- 7 Rowan Drive
- 23 Sharp Road
- 25 Sharp Road
- 18 Stonebridge Avenue
- 25 Vinery Road
- 118 Winthrop Road

39. The points raised are summarised below:

40. Highways and access

- Significant increase of traffic along Hardwick Lane
- The alternative sites have much better road access to the A14.
- Existing road network is already heavily congested.
- The heavy works traffic has not been considered during the construction phase.
- The provision of a multi storey car park will encourage more traffic.
- Strong concerns in respect of Gypsy Lane being closed and turned into a pedestrian/cycleway only.
- Gypsy Lane should be widened to take traffic away from Vinery Road and Horringer Road.
- Temporary construction compound poses safety issues for users of Horsecroft Road.
- The existing site is already the cause of significant traffic congestion primarily at the Spread Eagle Junction, the Southgate roundabout, Wilks Road and Cullum Road, this will be further increased and needs to be addressed.
- Adequate provision on the site for drop off/pick up points close to the Hospital is essential.

- It is unclear how users with mobility or accessibility issues would safely move around the site.
- How will parking on nearby residential streets be prevented?
- Impact on access to properties along Hardwick Lane as a result of roundabout and pedestrian and cycle crossings.
- Site is not accessible to emergency vehicles.
- Residential roads around the hospital are already rat runs for local traffic and are dangerous for pedestrians and cyclists.
- Retaining or improving a park and ride scheme for hospital staff and visitors and taking hospital admin support off-site should be considered.
- Other sites considered for the new hospital would have had direct access to main road infrastructure, such as the A14.

41. Landscape, ecology and drainage

- The environmental impact a construction of this size will have on the grassland and the flora and fauna the site currently sustains.
- Loss of irreplaceable habitat. The application should be refused on this basis.
- Existing ancient and veteran trees should not be removed.
- Impact to veteran trees on site.
- Impact on surface water flooding.
- The proposed building will have a detrimental effect on wildlife due to noise and light pollution.
- More onsite ecological improvements should be included.
- Impact to Special Landscape Area.
- Impact on surface water drainage and flooding.
- Tree 118 (English Oak) is being proposed to be removed. The tree should be protected.
- Concerns that the basin/lagoon will result in flies and mosquitoes.
- Detrimental impact to character and tranquillity of the landscape and rural setting.
- Need for tree screening between Hardwick Manor and buffer zone.
- Adverse impact to protected species.
- The 'wholly exceptional reasons' as set out in the NPPF for ecological mitigation and compensation has not been satisfied.

42. Residential amenity

- Significant noise and visual impact to residential properties during and post construction.
- No measures to mitigate impact to residential properties have been identified.
- Residents from Sharp Road will be severely impacted by this proposed development.
- Unacceptable level of dust and noise will be created during construction.
- Loss of outlook and view to 25 Sharp Road.
- Impact on residential amenity from traffic noise and light disturbance as a result of access being located 50meters from boundary of 25 Sharp Road.

43. Visual amenity

- Unclear from the plans to what extent the building will be visible above the tree line.
- Concerns regarding 24hour lighting of the building, if the building extends beyond the tree line.
- Building should remain below the tree line.

- The significant height and size of the building is in stark contrast to the current landscape and will tower above surrounding environment.
- Proposed building is to be 33metres high and will result in adverse visual impact.
- The proposed building is too tall.
- Hardwick Manor is a site of great beauty and historical interest.
- Imposing building.

44. Other

- The proposal does not accord with the provisions of the Local Plan and all reasons and material considerations for that departure need to be fully considered.
- Proposal is contrary to Policy DM5 (development in the countryside) and other policies.
- Unclear when the existing hospital will be demolished
- Unsustainable location, other sites are more suitable.
- The development of the Hardwick Manor site will result in the retention of existing buildings at the current hospital site.
- Representation made previously are still applicable.
- The noise and pollution impact due to the envisaged extra traffic needs to be limited and controlled.
- The future development of the existing hospital site should be controlled.
- Premature public consultation by the applicant.
- Insufficient and inaccurate information submitted by applicant in relation to technical reports.

45. A further 14 representations were received from the following addresses during the second consultation:

- 9 Linton Gardens
- 24 Woodside Close
- 67 Hardwick Lane
- 71 Hardwick Lane
- 75 Hardwick Lane
- 90 Hardwick Lane
- 104 Hardwick Lane
- 96 Home Farm Lane
- 106 Home Farm Lane
- Birch Cottage
- Red House
- 51 Vinery Road
- 23 Sharp Road
- 47 Horsecroft Road

46. The points raised are summarised below:

47. Highways and access

- What measures would be put in place to prevent traffic from using Horsecroft Road and Hardwick Lane?
- The existing site is already the cause of significant traffic congestion primarily at the Spread Eagle Junction and at the Southgate roundabouts.
- Residential roads around the hospital are already rat runs for local traffic and are dangerous for pedestrians and cyclists.
- Rembrandt Way and Barons Road will end up as rat-runs of vehicles trying to escape the hold ups caused by such a scheme.

- An expansion of the current hospital site not only retains but increases the access issues and traffic congestion already experienced in Hardwick Lane.
- Significant increase of traffic along Hardwick Lane by 200-300 vehicles following the withdrawal of the rugby club park and ride.
- Proposals for new layout of junctions at Hospital entrance off Hardwick Lane to include three sets of traffic lights within a 200metres stretch of road along the hospital frontage will only add to congestion in this area.
- A second access should be provided to reduce pressure on the current access and mitigate the risk of the road being blocked and no one being able to get to the hospital.
- Emergency vehicles struggle to access the site during times of congestion.
- The helipad will remain on Hardwick Heath necessitating critically ill patients to be transferred to and from the new hospital via ambulance due to the distance of the current helipad from the new hospital.
- Patients arriving via bus service to the site will need to leave the bus and change to a shuttle in order to access the hospital. This is not appropriate for those with mobility issues.
- Lack of detailed and accurate design information in the current submission for the proposed changes to the access to the Hospital site from Hardwick Lane.
- There must be an expectation for a further increase in traffic to the site generally additional parking is being provided on site.
- Retaining or improving a park and ride scheme for hospital staff and visitors and taking hospital admin support off-site should be considered.
- The use of the construction road next to Gypsy Lane should be made permanent as a more direct alternative access to the site.
- Dangerous access to properties along Hardwick Lane where proposed access is located to hospital site.
- Gypsy Lane and Horsecroft Road will be impacted by the proposed development.
- Reducing the width of the road to add a new cycle path, will make access for emergency vehicles more difficult during the rush hour periods.
- The alternative sites have much better road access to the A14.
- Consideration should be given to a second entrance along Gypsy Lane, in light of outline planning application at land north of Gypsy Lane for 220 dwellings.

48. Landscape, ecology and drainage

- Temporary compound would have detrimental effects on wildlife.
- Many well-established trees, supposedly protected by TPO, are to be felled.
- The current hospital entrance will be expanded to incorporate traffic lights and as a result it is planned to fell 46 trees, some veteran and some cedars.
- The environmental impact a construction of this size will have on the grassland and the flora and fauna the site currently sustains.
- Loss of irreplaceable habitat.
- The detail of any ecological mitigation measures needs to be clearly measurable and enforceable.
- Why is ecological mitigation off site, why cannot not be on site?
- Cycle and pedestrian access from the proposed crossing along the eastern boundary of the hospital site adjacent to the Heath will result in the loss of trees.
- A distinct boundary between the hospital and the Heath needs to be created.

- New footpaths along the boundaries of the site will create pressure for these to be lit for users, this would then result in an ecological impact.
- No argument presented that outweighs the loss of the parkland.
- The site is in an area prone to flooding.
- Existing flooding issues along Hardwick Lane and A134.
- Destruction of habitat.
- Unsustainable ecological compensation strategy.
- Impact to Special Landscape Area.

49. Residential amenity

- Impact of noise, dust and light pollution residents will experience during the years of construction.
- Multi storey car park will result in light, visual and noise impact.
- The lack of detail in respect of the landscaping buffer gives no reassurance to residents at Sharp Road.
- The access road which will be used 24 hours a day seven days a week will cause noise, vibration, light and privacy issues.
- The construction period is many years long and will have immediate impact on surrounding residents from a noise, vibration, dust, light and visual perspective.
- It cannot be acceptable that the screening measures for Sharp Road will take 15 years to reach their full effect, which is still only aiming to be partial mitigation.
- Impact on properties along Hardwick Lane as a result of traffic lights, through light and noise pollution

50. Visual amenity

- The wider visual impact will be significant and detrimental.
- Indicative heights and massing plan of the new hospital shows a proposed development that is taller than almost all other buildings in Bury St Edmunds with the exception of the Cathedral tower and the British Sugar site.
- Proposed building is overbearing and out of keeping with surrounding landscape.
- Concerns regarding artificial light spill and 'sky glow'.

51. Other

- Proposal is against current planning policy.
- Hardwick Manor as a site for a new hospital has not been properly evaluated against other more suitable locations.
- What will the compound site be used for after the hospital has been built?
- Other sites considered for the new hospital would have had direct access to main road infrastructure, such as the A14, essential in the case of a major incident.
- It is essential to situate a hospital in a place suitable for expansion and to be future proof
- Clarification required on the plans for the use of the helipad at night.
- Issues with the accuracy of the scoring system used in site selection process.
- Application description and site address is misleading.
- Large volume of documents and level of detail within the documents.
- The use of the existing hospital site has not been explored.
- Lack of equal access to services.
- Unacceptable level of carbon emissions.
- No space for provision of new helipad on site.

- Unsustainable developer.
52. During the third consultation, 12 representation were received from the following addresses:
- 23 Sharp Road
 - 25 Sharp Road
 - 74 Home Farm Lane
 - 11 Holywell Close
 - 104 Hardwick Lane
 - 106 Home Farm Lane
 - 40 Pound Hill
 - Lodge Cottage
 - Hawstead Place
 - Horsecroft Hall
 - Horsecroft Lodge Cottage
 - 25 Vinery Road
53. The points raised are summarised below:
- 54. Highways and access**
- It is unclear how users with mobility or accessibility issues would safely journey from the bus terminus to the hospital entrance.
 - If a traffic light junction is proposed, the amount of exhaust emissions of vehicles waiting for the change of lights will increase.
 - Rembrandt Way and Barons Road will end up as rat-runs of vehicles trying to escape the hold ups caused by such a scheme.
 - The volume of traffic will be significantly with the number of construction vehicles.
 - The compound at the end of Gypsy Lane will still have to be accessed possibly from Horsecroft Road and definitely Gypsy Lane itself.
 - The pinch points such as at the Spread-Eagle junction, Barons Road junctions, Wilks Road roundabout, Southgate Green roundabout and Sainsburys access to the A14 will be pushed to their limits.
 - Support the proposal for a multi storey car park.
 - The existing plan seems to locate the hospital a long way away from the car parking options and other buildings, which does not appear to make sense for staff and patients.
 - Sufficient parking should be provided on site for staff and visitors.
 - Lack of alternative access points to the proposed new hospital.
 - Secondary access via Gypsy Lane would reduce congestion.
 - Insufficient highway information.
 - The proposed plans submitted have not considered the impact on the local highway network sufficiently for the construction phase.
 - Network resilience and alternative routes are fundamental to the overall access considerations.
 - An enforceable solution is required to eliminate the risk, and consequent inconvenience and danger to users of Horsecroft Road and Gypsy Lane.
 - Traffic-light controlled junction will have negative impacts for staff, patients, visitors and residents in the vicinity.
 - The proposal should be refused on transport and highways grounds.
 - Lack of physical equal access to the hospital
 - The scheme doesn't have full regard to all the traffic implications on the highway network.

- the development site should not be permitted until a rigorous and comprehensive assessment of the existing highway network and all its problems have been carried out and looked at thoroughly
- By introducing traffic lights at the entrance to the hospital more tailbacks will be created and further residents in the locality will be subjected to such inconveniences
- Public transport to the site is poor and not well used which adds further burden on the highway network
- The poor quality of the present footpaths in the vicinity of the application site and their deficiencies act as a deterrent to walking and need to be addressed if the intention is to make the development fully accessible by all including those who have mobility issues. The proposal is a clear opportunity to secure investment in the maintenance of footpaths to remedy the years of under investment in repairs, maintenance and upgrading
- Any travel plan by the WSFT will do little to mitigate car use.

55. Landscape and ecology

- West Suffolk Hospital's track record for maintaining shrubs and trees to provide screening has been very poor, due to the neglect of the planted trees.
- The proposal will result in significant tree and green buffer loss in the hospital site and along Hardwick Lane.
- Destruction of wildlife habitat.
- Major disturbance to wildlife.
- Proposal is contrary to paragraph 180 (c) of the National Planning Policy Framework and should be refused on this basis due to inadequate compensation strategy for loss of irreplaceable habitat.
- Biodiversity Net Gain will not be possible due to significant impact on biodiversity.

56. Visual amenity

- A visual night time assessment should be undertaken for the Grade II Listed Building, Horsecroft Hall, and full effective mitigation confirmed for the building upper floors on the south and western facades, as part of the detailed design at Reserved Matters stage.
- The proposed building will project above the tree line and impact the special landscape area, result in light spill and negatively impact residential amenity.

57. Residential amenity

- The access road which will be used 24 hours a day seven days a week will cause noise, vibration, light and privacy issues.
- There should be a requirement for an acoustic barrier along the access road.
- The construction period is many years long and will have immediate impact on surrounding residents from a noise, vibration, dust, light and visual perspective.
- It cannot be acceptable that the screening measures for Sharp Road will take 15 years to reach their full effect, which is still only aiming to be partial mitigation.
- Impact from construction compound to the residential amenity of the properties adjacent to the site and location of the compound.
- Potential noise and light concerns due to plant equipment and height of the building.

- Construction technology should be used to minimise the amenity impact both of lighting at night and noise 24/7 and should be incorporated at final design stage.
- Concentrating the vast majority of two-way traffic into one junction will significantly increase pollution and noise in the immediate area.
- Traffic light controlled junction will negatively impact the residential amenity to residents along Hardwick Lane as a result of noise and traffic.
- Landscaping at the entrance to Hardwick Manor from Sharp Road will be overbearing and cause a loss of light
- The landscaping should be set further away from 25 Sharp Road and include evergreen species
- Planting should be in place before development starts.

58. Other

- Representation made previously are still applicable.
- Support a new hospital as the existing ageing hospital is in need of replacement however, do not consider the layout of the proposal supports the effective running of the new site for staff and patients.
- The applicant should be encouraged to enter into meaningful discussions with the few residents severely affected by this application along Sharp Road.
- Concerns of the East of England Ambulance Service have not been addressed.
- Proposal results in unsustainable development.
- Proposal is contrary to the Development Plan.
- Applicant will be unable to meet climate change targets.
- The helipad will remain on Hardwick Heath necessitating critically ill patients to be transferred to and from the new hospital via ambulance due to the distance of the current helipad from the new hospital.
- The helipad is not in accordance with Civil Aviation guidance.
- Issues with the site selection process
- Land at Rougham Airfield should be pursued by the applicant.
- Premature pre-consultation by the applicant.
- Increased surface water flood
- The new hospital should be next to the A14 as it will be easier to access
- Most people don't appear to know that the biodiversity compensation will cost significant amount of money

59. Full copies of the representations received are available to view on the public planning file online using the following link:

[DC/22/0593/HYB | Hybrid planning application - a. outline application \(means of access to be considered\) for a new hospital \(use class C2\) of up to 100,000 square metres and surface and multistorey car park with associated infrastructure, structural landscape buffer, temporary construction compound and demolition of existing hospital buildings. b. full planning application - change of use of Hardwick Manor from a single residential dwelling \(use class C3\) to health related uses associated with the new hospital \(use class C2\) as amended by plans and documents received 08.08.2022 | Land At Hardwick Manor Hardwick Lane Bury St Edmunds IP33 2RD Suffolk \(westsuffolk.gov.uk\)](https://www.westsuffolk.gov.uk/planning-and-building-control/planning-applications/hardwick-lane-hospital-application)

60. Consultees

61. The application has been subject to amendments and additional information has been submitted to address concerns raised. The consultation responses are

set out below in summary. Full copies of all of the consultation responses are available to view on the public planning file online using the link above

62. National Highways (May 2022)

- AECOM prepared a Technical Note (TN) on behalf of National Highways (NH) to document a review of the Transport Assessment. The TN highlighted a number of concerns and therefore identified recommendations.

63. National Highways (November 2022)

- Following consideration of additional and amended information, National Highways recommend that conditions should be attached to any planning permission that may be granted.

64. Suffolk County Council (SCC) Highway Authority (May 2022)

- Notice is hereby given that the County Council, as Highway Authority, submits an objection to the application in its current form as it is not in accordance with the National Planning Policy Framework (NPPF).
- The application has not prioritised the promotion of sustainable transport. The application has not evidenced that safe and suitable access can be achieved for all users. The application has not evidenced that there would not be an unacceptable impact on highway safety and the residual cumulative impacts on the road network would not be severe.
- Further information is required in relation to travel planning and public transport.

65. Suffolk County Council (SCC) Highway Authority (November 2022)

- The Highway Authority has completed the review of the revised application and acknowledge the significant improvements over the former proposal. The resubmitted application includes a substantial package of measures to improve sustainable travel facilities, has replaced the proposed roundabout with a signalised junction, proposes enhanced bus stop facilities and includes a commitment to fund traffic regulation order making and a Travel Plan.
- The Highway Authority recommends that the West Suffolk Hospital development application is acceptable, subject to the recommended highway conditions.

66. SCC Archaeological Service (May 2022)

- SCC Archaeological Service has reviewed the data available and consider that trial trenching evaluation prior to determination of the hospital site is required, as new information has been identified that suggests that an aqueduct associated with the Medieval Abbey may cross the site.
- Therefore, based on the currently available information, this service cannot support the proposal in its current form, although we do not object to the principle or the position of the Hospital building itself. An evaluation tightly focussed one or two trenches, with further trenching and mitigation secured by condition.

67. SCC Archaeological Service (November 2022)

- To date, Geophysical Survey and very limited Archaeological Trenched Evaluation (SUDS locations only) has been undertaken. Given the flexibility within the scheme going forward and the public importance of the development, in this instance, this provides sufficient information to inform the principle of development and determine this application.

However, further archaeological investigations must be secured to fully characterise the archaeology present and inform a mitigation strategy for heritage assets impacted by development.

- There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

68. SCC Public Health (May 2022)

- Consideration should be given to hospital design and community space, air quality and environment sustainability, active travel, food and healthy choices, economy and employment, open space and recreation and mitigations to reduce health impacts during demolition.

69. SCC Lead Local Flood Authority (May 2022)

- Holding objection as the Lead Local Flood Authority (LLFA) require further information to fully demonstrate that a viable and safe proposal can be developed before, we will be in a position to recommend approval for the outline portion of the application.
- SCC LLFA have concerns with regard to the proposed flood management/drainage features and their positioning in comparison to constraints such as existing vegetation and trees, access routes and building footprints. Insufficient infiltration testing has been undertaken, there are discrepancies between the drawings and the calculations for the drainage features, there are no calculations to demonstrate that the runoff from the 'ward fingers' can be effectively managed and flooding is shown to occur in the calculations which has not been fully addressed.

70. SCC Lead Local Flood Authority (September 2022)

- The proposal does not yet fully meet current standards for sustainable and multifunctional SuDS in accordance with national and local guidance and policy, however the Lead Local Flood Authority acknowledge that this can be resolved at the more detailed design stage and we withdraw our holding objection and request that our recommended conditions are imposed in relation to surface water drainage.

71. SCC Minerals and Waste (May 2022)

- This proposal is not within a close proximity of any existing or proposed mineral or waste development as set out in the Suffolk Minerals and Waste Local Plan.
- This proposal is located within the Minerals Safeguarding Area, outlined in Policy MP10: Minerals consultation and safeguarding areas and associated maps. The proposal is in a site area of 54 hectares, of which the construction of the hospital will be up to 100,000sqm (10 hectares). This is above the 5Ha threshold for safeguarded areas.
- Request further information on the Mineral deposit at this safeguarded location.

72. SCC Minerals and Waster (July 2022)

- These comments are an update to those dated 13 May 2022. While the site is located in a Minerals Consultation Area and above the 5Ha threshold as set out in Policy MP10 of the Suffolk Minerals and Waste Local Plan (July 2020). Based on the information contained within the Tier 2

Geoenvironmental Assessment (66202555-SWE-ZZ-XX-RP-J-0002) and the Tier 2 Contamination Assessment (66202555-SWE-ZZ-XX-RP-J-0004), it is considered that there is insufficient minerals onsite to require prior extraction before the above development can take place. Therefore, a Borehole and Grading Analysis will not need to be undertaken.

- Suffolk County Council as the Minerals and Waste Authority does not object to the above application.

73. SCC Development Contributions Manager (April 2022)

- There are no section 106 contributions required from the County Council in terms of education, waste, or libraries. In terms of nursery provision, it is noted from the proposal that the existing Busy Bees nursery is to be retained. However, we would like to agree with the applicant that sufficient workplace nursery provision is provided on site – this will be important for staff recruitment and retention.

74. SCC Development Contributions Manager (August 2022)

- In order to protect the educational facilities on site, I would encourage the local planning authority to impose a planning condition to ensure the ongoing availability of them. This is in line with Policy CS14 of the St Edmundsbury Core Strategy, Policy BV24 of the Bury St Edmunds Vision 2031, and Policy DM41 of the Joint Development Management Policies Document.

75. SCC Public Rights of Way (May 2022)

- The Rights of Way & Access Team recommend that the proposed walking and cycling routes, relative to the scale and nature of the development, do not meet national and local policies and therefore we submit an objection.

76. SCC Public Rights of Way (November 2022)

- The Public Rights of Way Team welcome the proposed off-site sustainable routes. The Local Plan, National Planning Policy Framework, Rights of Way Improvement Plan and the Gear Change and LTN 01/2020 documents make it clear that all development must prioritise sustainable modes of transport. This development will generate significant amounts of traffic and is the largest employer in the town of Bury St. Edmunds. Ensuring that the new hospital has high quality, car free routes serving it is fundamental in ensuring that those people who can walk and cycle to the hospital have the right facilities to do so. They make the proposal acceptable in transport terms.
- If West Suffolk Council is minded to approve this application, it is recommended that consultation on legal particulars to create public highways or amend existing Rights of Way is sought at the earliest opportunity through the appropriate County and District Council personnel.
- No objection subject to conditions and S106 agreement.

77. Place Services – Arboricultural Officer (May 2022)

- It is recommended that a holding objection is placed on this application in relation to arboriculture. The impact that is anticipated on the trees on site, particularly on veteran and candidate veteran trees, goes against planning guidance.
- There are also fundamental conflicts that do not appear to have been addressed between the trees and the drainage. At present from the information provided, it is unclear whether such conflicts can be resolved and still deliver an effective system on site.

78. Place Services – Arboricultural Officer (November 2022)

- The holding objection placed on the application with regards to arboriculture is removed and support is given to the proposal. The scheme has been improved and comments have been actioned, resulting in a more appropriate and sensitive proposal to protect the long term impacts on the most important trees on the site.
- Should the application be granted consent, the Arboricultural Impact Assessment and Method Statement, as well as the Tree Protection Plans, will need to be updated as part of a Reserved Matters application in order to minimise the Arboricultural impact.
- Any tree removals will need to be compensated for with mitigation planting to ensure that ecosystem services are not adversely affected as a result.
- As part of a Reserved Matters application, any route through the Arboretum will need to be agreed.

79. Place Services – Landscape Officer (May 2022)

- There are fundamental conflicts that do not appear to have been addressed and additional information that is required as part of this application.
- A landscape and visual night-time assessment is required to be undertaken, landscape sections provided showing the existing residential properties, an environmental colour assessment needs to be undertaken, conflicts between landscaping and drainage details, maximum heights parameter plans need to be clearer and advise maximum parameters height is reduced.

80. Place Services – Landscape Officer (September 2022)

- There are still some areas of differing landscape and visual impact judgements, however generally it is agreed that there will be a level of adverse harm both to landscape character and visual amenity.
- In terms of significance, this will mostly be localised, however given the requirements of Policy DM5 and DM13, it should still be considered in the overall balance.
- Additional information and amendments are sought, and a detailed Environmental Colour Assessment and Night-time Landscape and Visual Impact Assessment should be conditioned to ensure the detailed design proposals are suitably informed.

81. Place Services – Landscape Officer (November 2022)

- There are still some areas of differing landscape and visual impact judgements, however generally it is agreed that there will be a level of adverse harm both to landscape character and visual amenity. In terms of significance, this will mostly be localised, however given the requirements of Policy DM5 and DM13, it should still be considered in the overall balance.
- If planning application is approved, recommend conditions are imposed.

82. Place Services – Ecology Officer (May 2022)

- Holding objection due to insufficient information on European Protected Species (Gt crested newt) and irreplaceable and Priority habitats (wood pasture and parkland)

83. Place Services – Ecology Officer (September 2022)

- There is sufficient ecological information available to support determination of this hybrid application.
- Based on the submitted Compensation Strategy for the Loss of Irreplaceable Habitat (Sweco, 1 August 2022) and the results from eDNA sampling of grassland fungi assemblage once available, we consider that there is an acceptable pathway for determining an appropriate and bespoke mitigation and significant compensatory habitat creation for loss of irreplaceable habitat for the outline element of this application using current best practice to make it acceptable.
- No objection subject to securing ecological mitigation and compensation and biodiversity enhancements.

84. Place Services – Ecology Officer (November 2022)

- Reviewed the Appendix M Autumn 2022 Bat Survey Results Environmental Statement Addendum (Revision 1) (Sweco, Oct 2022) which was triggered by proposed design changes for the project. This provides sufficient information on protected species in relation to the anticipated loss of additional trees.
- Satisfied that the results do not indicate any additional bat roosts in the new trees to be removed and that appropriate mitigation will be in place to manage the risk of these mobile protected species being present at the time of felling. A method statement will be required for this work to be undertaken under the supervision of a bat licenced ecologist.
- Whilst at present, this indicates a biodiversity net gain (BNG) of 7.55% (excluding irreplaceable habitats), we recommend that the applicant identifies further BNG opportunities at reserved matters stage.
- Recommend the mitigation and compensation measures in the ES Addendum (Revision 1) Final Issue (Sweco, Oct 2022) are also secured by a condition of any consent.

85. Environment Team – Public Health and Housing (May 2022)

- Object due to lack of information supporting the application. Clarity and further information is required in relation to noise, lighting, plant and machinery and construction.

86. Environment Team – Public Health and Housing (August 2022)

- The additional information and details satisfy the concerns initially raised by Public Health and Housing. No objection subject to detailed conditions.
- It is understood residents have raised concerns about the general visual impact of the building and the associated impact from illumination at night. It is important to mention that any complaints which are made regarding the overall level of illumination from the building will not be able to be actioned through our enforcement powers relating to Statutory Nuisance. The overall level of illumination and visual impact is an amenity issue and therefore a planning decision. Due to the size of the building and the fact it will be operating 24 hours a day, the proposed hospital will cause an amenity impact. It is advised that the mitigation measures included within the "Lighting Impact at Night – Mitigation Handbook" should be considered throughout the design stage to minimise this impact as much as possible.

87. Environment Team – Public Health and Housing (November 2022)

- Following our conversation regarding concerns about the impact from the new hospital development on Lodge Cottage. I confirm I have reviewed the location on the plan and have the following comments to make.
- Residents of Lodge Cottage may experience loss of amenity during the construction of the hospital. The applicant will need to ensure compliance with the agreed Construction Management Plan (CMP) as agreed by condition which will be in place to protect the amenity of nearby residents from such impacts as noise or dust. The applicant will also be required to comply with the contents of the CMP at all times. The site must be organised and operated in a way that will always reduce the impact of nearby residential properties as much as possible. The applicant should ensure positive engagement with residents at all stages of the project and look to address any concerns and implement any practical solutions to reduce any impacts.
- In addition to the enforcement of the CMP, we have additional powers under the Environmental Protection Act 1990, to investigate complaints of Statutory Nuisance should they be received. It will be the applicant's responsibility to demonstrate they are adopting best practical means on-site to mitigate the impact. We will of course investigate all complaints received by our department, and engage with planning enforcement and the applicant as appropriate, and where necessary and justified follow our enforcement protocol.

88. Environment Team – Air Quality Officer (May 2022)

- The Environment Team accept the conclusions of the Air Quality Technical Report. No objection to application, subject to condition regarding EV charging points and an air quality assessment to consider the construction traffic.

89. Environment Team – Air Quality Officer (August 2022)

- The addendum report confirms that the proposed changes in road layout only have marginal changes to the previous assessment and that the conclusions of the previous assessment remain valid. We agree with this conclusion and confirm that our previous comments, that no site-specific mitigation measures are required with respect to air pollution from proposed operational traffic to the site.
- We are therefore satisfied that our previous comments and recommended conditions remain valid and unchanged.

90. Environment Team – Land Contamination Officer (May 2022)

- Environment Team are satisfied with the scope and conclusions of the assessments for the existing West Suffolk hospital site; however, further intrusive investigation and associated assessment is required to supplement the Tier 2 report.
- It may be more suitable for investigations to take place following decommissioning of the existing hospital buildings.
- No objection and recommend detailed conditions are imposed.

91. Environment Team – Land Contamination Officer (August 2022)

- We note the changes to the Tier 1 and Tier 2 reports for the West Suffolk Hospital site reports due to the changes in the northern boundary, however, these do not have a significant impact on the reports or the

conclusions therein. We are therefore satisfied that our previous comments and recommended conditions remain valid and unchanged.

92. Environment Team – Environmental Management Officer (May 2022)

- The Environment Team have reviewed the Sustainability Statement dated 28th March 2022 and welcome the commitment to BREEAM Excellent. However, the BREEAM pre-assessment has not been supplied. We suggest a condition is imposed to ensure that BREEAM commitments are delivered.
- The Environmental Statement volume 1, chapter 16 and the Design and Access Statement have contradicting information regarding CO2 emissions and additional information and clarification is required.

93. Environment Team – Environmental Management Officer (August 2022)

- The Environment Team have reviewed the Amended Environment Statement carbon chapter and are now satisfied that, with the inclusion of biogenic carbon stores, the methodology used, and conclusions made are appropriate.
- Our previous comments and recommended conditions remain valid and unchanged.

94. Suffolk Preservation Society (May 2022)

- We understand that this has long been identified as the preferred location for the new facility and acknowledge that there will be significant operational, financial and user benefits of developing a site close to the existing hospital. However, it is also clear that the location raises a number of concerns regarding traffic movements and congestion during both the construction and operational phases and we urge that serious consideration is given to how best this can be managed to mitigate these negative impacts on the local community.
- The public benefit of providing a new required health facility outweighs this high level of less than substantial harm on the setting of Hardwick Manor.
- All options should be fully explored to mitigate the visual impact of the new hospital buildings on the setting of Hardwick Manor and its gardens.
- Support change of use of Hardwick Manor to health uses.

95. Conservation Officer (May 2022)

- Hardwick Manor is a recently listed Grade II Listed Building.
- The wider parkland setting of the building contributes to its significance, forming part of the historic grounds of Hardwick House and providing a peaceful, natural setting for Hardwick Manor today.
- Mitigation measures would still not compensate for the fact that the parkland setting of Hardwick Manor would be dramatically changed by the proposed hospital, which would be of a considerable scale and in close proximity to the listed building.
- Object to the outline planning application on heritage grounds due to the harm which would result to the setting of Hardwick Manor. I appreciate, however, that this harm may be outweighed by the public benefits of the scheme in the planning balance.

96. Suffolk Wildlife Trust (May 2022)

- Holding objection due to there being no suitable compensation strategy for the loss of irreplaceable habitat submitted with this application. There is also a lack of evidence to inform the design of a suitable compensation strategy for the loss of and damage to the site's ancient wood pasture and

parkland priority habitat mosaic and regionally important grassland fungi assemblage.

97. Suffolk Wildlife Trust (September 2022)

- We are now satisfied that there is sufficient detail and evidence submitted with this application in order for us to withdraw our holding objection to this application.
- No objection subject to securing ecological mitigation and compensation and biodiversity enhancements

98. Anglian Water (May and September 2022)

- No objection, recommend informatics imposed if planning permission is granted.

99. Natural England (May and November 2022)

- No objection, subject to appropriate mitigation being secured.

100. Environment Agency (May 2022)

- No objection, subject to conditions.

101. Environment Agency (August 2022)

- We have no objection to the proposed amendments. Our previous recommendations and comments (AC/2022/131023/01-L01 dated 11 May 2022) remain pertinent. With reference to drawings within the drainage strategy report, the applicant is reminded that we do not regard deep infiltration systems as being routinely acceptable and would only approve such systems if it is demonstrated that they satisfy all of the requirements within G9 of our Groundwater Protection Position Statements.

102. Bury Society (May 2022)

- The Bury Society welcomes the potential overall benefits of the proposed new hospital as part of its commitment to the welfare of the town, its residents and its businesses. We would like to see a public reassurance that the traffic impact of the development will be closely monitored and that additional mitigation measures will be undertaken if required.

103. Bury Society (September 2022)

- The proposals generally enhance the original plans in response to various comments from local public authorities, local organisations and local residents.

104. East of England Ambulance Service (April 2022)

- Support the application for a new hospital.
- Request clarification regarding arrangements for emergency blue light access and egress in the event of a significant incident at the roundabout and along the access route.

105. East of England Ambulance Service (November 2022)

- EEAST are pleased to note the entrance to new West Suffolk Hospital site will be via traffic lights rather than the originally proposed roundabout for safety reasons of all road users and that Suffolk Highways are satisfied with the signalling capacity/arrangements.
- We also note the proposed the internal road width has been widened to 6.9m which should allow sufficient space for 2 cars and a blue light ambulance to pass (a Fiat ambulance is 2.7m wing mirror to wing mirror)

or 2 ambulance going in opposite directions to pass one another (with no other vehicles to pass). In a situation where ambulances under blue lights are travelling in opposite directions (eg entry and egress), we would expect the egressing ambulance crew to give way to the entering ambulance.

- EEAST also notes in the event of the primary route becoming fully blocked that ambulance/emergency vehicles can use the cycle/footway under temporary managed closure to cyclists and pedestrians.
- EEAST notes the Rain Garden barrier is 2m wide, but the depth is not indicated on the plans, so we assume the dropped curb to enable ambulance access to the cycle/pedestrian footways are at designated points along the route (to prevent damage to both the Rain Garden [drain] and to ambulance/other vehicles).
- EEAST would like to engage with West Suffolk Hospital when they start the detailed design to ensure sufficient emergency ambulance and Patient Transport Service parking is available at the respective adult and paediatric accident & emergency entrances as well as for maternity and neonatal entrances (these tend to be significantly less busy than at A&E).

106. **Suffolk Fire and Rescue (April 2022)**

- Access and firefighting facilities - Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations and a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes should be provided.
- Water supplies – No record of any public or private fire hydrants for the site. As such, fire hydrants should be installed.
- Sprinklers advised - Recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system

Development Plan Policy

107. **Policy:** On 1 April 2019 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single authority, West Suffolk Council. The development plans for the previous local planning authorities were carried forward to the new Council by regulation. The development plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies Document (which had been adopted by both councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to determine this application with reference to policies set out in the plans produced by the now dissolved St Edmundsbury Borough Council.

108. The following policies of the Joint Development Management Policies Document (adopted Feb 2015), the St Edmundsbury Core Strategy (adopted Dec 2010), the St Edmundsbury Borough Council Local Policies Map Book (adopted Feb 2015) and the Bury St Edmunds Vision 2031 Document (adopted Sept 2014) have been taken into account in the consideration of this application:

- Policy DM1 Presumption in Favour of Sustainable Development
- Policy DM2 Creating Places Development Principles and Local Distinctiveness
- Policy DM5 Development in the Countryside
- Policy DM6 Flooding and Sustainable Drainage

- Policy DM7 Sustainable Design and Construction
- Policy DM8 Low and Zero Carbon Energy Generation
- Policy DM10 Impact of Development on Sites of Biodiversity and Geodiversity Importance
- Policy DM11 Protected Species
- Policy DM12 Mitigation, Enhancement, Management and Monitoring of Biodiversity
- Policy DM13 Landscape Features
- Policy DM14 Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- Policy DM15 Listed Buildings
- Policy DM18 New Uses for Historic Buildings
- Policy DM19 Development Affecting Parks and Gardens of Special Historic or Design Interest
- Policy DM20 Archaeology
- Policy DM33 Re-Use or Replacement of Buildings in the Countryside
- Policy DM35 Proposals for main town centre uses
- Policy DM41 Community Facilities and Services
- Policy DM44 Rights of Way
- Policy DM45 Transport Assessments and Travel Plans
- Policy DM46 Parking Standards
- Core Strategy Policy CS1 - St Edmundsbury Spatial Strategy
- Core Strategy Policy CS2 - Sustainable Development
- Core Strategy Policy CS3 - Design and Local Distinctiveness
- Core Strategy Policy CS4 - Settlement Hierarchy and Identity
- Core Strategy Policy CS7 - Sustainable Transport
- Core Strategy Policy CS8 - Strategic Transport Improvements
- Core Strategy Policy CS9 - Employment and the Local Economy
- Core Strategy Policy CS10 - Retail, Leisure, Cultural and Office Provision
- Core Strategy Policy CS11 - Bury St Edmunds Strategic Growth
- Core Strategy Policy CS13 - Rural Areas
- Core Strategy Policy CS14 - Community infrastructure capacity and tariffs
- Vision Policy BV1 - Presumption in Favour of Sustainable Development
- Vision Policy BV2 - Housing Development within Bury St Edmunds
- Vision Policy BV5 - Strategic Site - West Bury St Edmunds
- Vision Policy BV17 - Out of Centre Retail Proposals
- Vision Policy BV22 - West Suffolk Hospital and St Nicholas Hospice
- Vision Policy BV25 - Conserving the Setting and Views from the Historic Core
- Vision Policy BV26 - Green Infrastructure in Bury St Edmunds

Other planning policy:

National Planning Policy Framework (NPPF)

109. The NPPF was revised in July 2021 and is a material consideration in decision making from the day of its publication. Paragraph 219 is clear however, that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework; the closer the policies in the plan to the policies in the Framework; the greater weight that may be given. The policies set out within the Joint Development Management Policies have been assessed in detail and are considered sufficiently aligned with the

provision of the 2021 NPPF that full weight can be attached to them in the decision-making process.

110. Cycle Infrastructure Design Local Transport Note 01/2020 Published July 2020 Department for Transport Gear Change: A bold vision for cycling and walking Rights of Way improvement Plan "Suffolk Green Access Strategy" published 2020.

Officer comment:

Legislative Framework

112. This section of the report begins with a summary of the main legal and legislative requirements before entering into a discussion about whether the development proposed by this planning application can be considered acceptable in principle in light of national planning policy, local plan designations and other local planning policies. It then goes onto analyse other relevant material planning considerations (including site specific considerations) before reaching conclusions on the suitability of the proposals.

Planning and Compulsory Purchase Act 2004 (as amended)

113. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The principle of development in relation to the development plan and the conformity of the proposals with key policies are discussed through the rest of this report.

The Conservation of Habitats and Species Regulations 2017 (as amended)

114. The local planning authority, as the competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions related to European Protected Species (such as bats and Great crested newts).
115. *The local planning authority must not leave an assessment until the licence application stage (based on the judgement in the Hack Green Group (Appellant) v Cheshire East Council [2006] - APP/R0660/W/15/3131662).*
116. Two European Protected Species Mitigation Licences are required for this application and details of appropriate mitigation measures for bats and Great crested newt have been provided and embedded into the design of the proposed development. This will support the provision of the licences to allow certainty to the LPA that they will likely be granted.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations)

117. The hybrid planning application is considered to be EIA development and has therefore been accompanied by an Environmental Statement.

118. Officers have reviewed the document and consider the Statement complies with the requirements of Schedule 4 of the 2017 Regulations (Information for inclusion in Environmental Statements).

Natural Environment and Rural Communities Act 2006

119. The Natural Environment and Rural Communities (NERC) Act (2006) Section 40(1) places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

120. The potential impact of the application proposals upon biodiversity interest is discussed extensively in this report.

Equality Act 2010

121. Consideration has been given to the provisions of Section 149 of the Act (public sector equality duty) in the assessment of this application. The proposals do not raise any significant issues in this regard.

Crime and Disorder Act 1998

122. Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998 (impact of Council functions upon crime and disorder), To do all that they reasonably can to reduce wildlife crime, appropriate measures have been embedded into the application for bats, Great crested newt and badgers.

Planning (Listed Buildings and Conservation Areas) Act 1990

123. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states;

124. In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)...
...shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

125. The impact on heritage assets is discussed later in this report.

Community Infrastructure Levy Regulations 2010 (as amended)

126. These set out general regulations relating to the Community Infrastructure Levy, but Part 11 refers specifically to planning obligations (including those in S106 Agreements) and is relevant to the consideration of this planning application. The Regulations in Part 11 will influence the final content of a potential S106 Agreement (in the event that planning permission is granted).

127. Regulation 122 imposes limitations on the use of planning obligations and states (where there is no CIL charging regime), a planning application may only constitute a reason for granting planning permission for the development if the obligation is-

- 1) necessary to make the development acceptable in planning terms;
- 2) directly related to the development, and
- 3) fairly and reasonably related in scale and kind to the development.

128. Planning obligations arising from the proposed development are discussed later in this section of the report.

Wildlife and Countryside Act 1981 (as amended)

129. This is the primary legislation in Great Britain for the protection of flora, fauna and the countryside and provides Schedules of species (1-8) which have specific protection. Section 14 prohibits the release of any animal species that are listed in Schedule 9 of non-native species which have become established in the wild and represent a threat to the natural fauna and flora.

130. Under Part II of this Act, Natural England has a duty to notify any area of land which in their opinion is 'of special interest by reason of any of its flora i.e, formally designate it as a SSSI and advise on its management to maintain its interest features. If the local planning authority is minded to grant planning permission contrary to Natural England advice, it is required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice.

131. Appropriate measures have been embedded into the design of the proposed development for the protection of bats and Great Crested Newt as well as for Horringer Court Caves SSSI and The Glen Chalk Caves, Bury St Edmunds SSSI.

132. **The Environmental Damage (Prevention and Remediation) (England) Regulations 2015** define environmental damage as damage to protected species, natural habitats or significant damage to reaching or maintaining favourable conservation status. This means that the protection applies both to established protected habitats, but also habitats which may obtain a favourable conservation status. This is deliberately drafted; the intention is to prevent environmental harm occurring which may have an impact on the eventual conservation classification of a site.

Principle of Development

The Development Plan

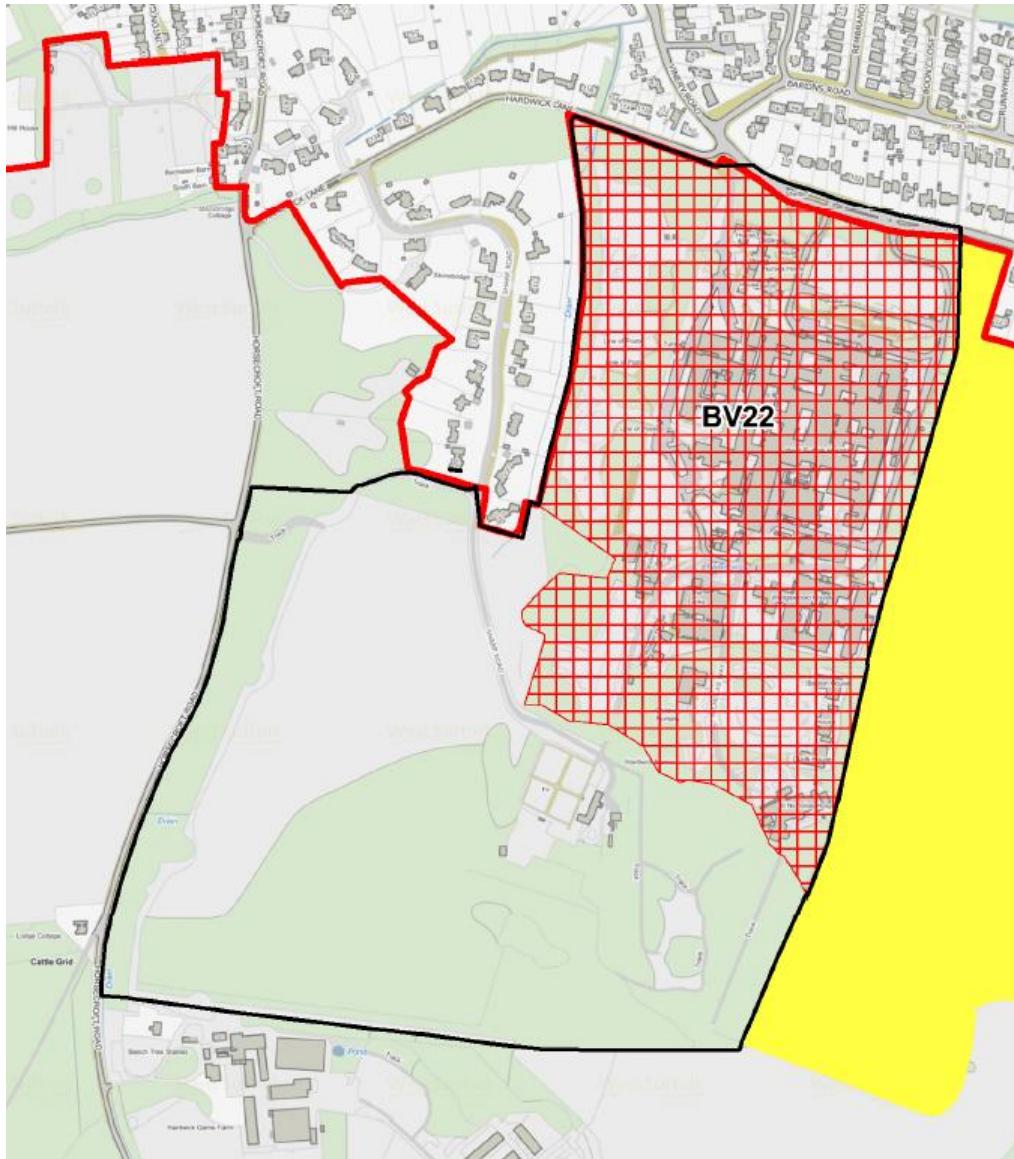
133. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

Development Plan Documents

134. The Statutory Development Plan was prepared in the knowledge that a new hospital would be required within the plan's lifetime. Accordingly, provision was made for such a development within the Bury West allocation (BV5 and

CS11). The proposed new hospital, under consideration here, would be located on the Hardwick Manor site which is located within the "countryside" for planning consideration purposes. However much of the application site is located on an existing hospital campus (see extract below) which is allocated for "health care and associated uses" under policy BV22 of the Bury Vision 2031 document.

135. Site area of the planning application (minus the construction compound) plotted as a black line against an extract of Inset 1 (Bury St Edmunds) of the St Edmundsbury Borough Council Policies Map Book (adopted 2015)



136. Policy CS13 of the adopted Core Strategy states that development outside of settlement limits (and therefore within the Countryside) will be strictly controlled, with a priority on protecting and enhancing the character, appearance, historic qualities and biodiversity of the countryside whilst promoting sustainable diversification of the rural economy.

137. Policy CS1 of the Core Strategy sets the Local Plans Spatial Strategy and sets out that the main focus of growth will be in the towns of Bury St

Edmunds and Haverhill. CS4 sets the Settlement Hierarchy and identifies Towns and other types of Settlements in the District.

138. Policy DM5 of the JDMPD states that areas designated as countryside will be protected from unsustainable development. A new or extended building will be permitted, in accordance with other policies within the JDMPD, where it is for:
- a) Purposes directly related to agriculture or forestry
 - b) Affordable Housing for local needs in accordance with other policy
 - c) Development relating to equine related activities
 - d) Essential small scale facilities for outdoor sport or recreation or other uses which preserved the openness, appearance and character of the countryside, leisure activities, and new tourism facilities
 - e) A dwelling for a key worker in accordance with DM26
 - f) Small scale residential development in accordance with DM27
 - g) The replacement of an existing dwelling.
139. The policy also lends support to proposals for economic growth that recognise the intrinsic character and beauty of the countryside, will not result in the loss of the best agricultural land and would not harm significantly the historic environment, the landscape, nature conservation or biodiversity and would not have significantly adverse impacts upon the local highway network
140. The proposed new hospital would be located in the countryside and as such it is considered contrary to the countryside policies of the development plan.

Conclusions on the principle of the outline element of the Development

141. The proposal seeks consent for a new hospital that would be located in the countryside. Other significant elements of the proposal like access roads and a large car park would also be located in the countryside. Owing to the situation of the new hospital being located in the countryside, this element of the proposal is contrary to the dominant operative policies of the Statutory Development Plan. The proposal was formally advertised as a departure from the provisions of the Development Plan at the outset. Accordingly, both Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the NPPF set out a 'presumption against' the development and direct that planning permission should be refused *unless material considerations indicate otherwise*.
142. However, it must be acknowledged that a significant proportion of the application site is located within the current hospital allocation. The main entrance to the site for public transport, motor vehicles, access roads, the large bulk of the car parking, including the multi storey car park are proposed on a site that accords with the proposed use.
143. Nevertheless, whilst essential elements of the proposed hospital are located within an allocation that accords with their use, officers take the view that the main element of the proposal (a proposed District General Hospital) is in the countryside and advise that significant weight should be attributed to the clear breach of the development plan which the proposal represents.

144. This report will go on to consider whether or not it is appropriate to grant planning permission as a departure from the normal provisions of the Development Plan in the light of any 'material considerations that indicate otherwise'.

Site selection

145. Objection has been received concerning the scoring matrix used by the WSFT to select the site they wished to pursue for a new hospital. The objection says that the scoring matrix used was flawed and assessment was premature as not all the constraints of the Hardwick Manor site were fully understood before the WSFT decided to pursue the Hardwick Manor site. Comments received set out that either the allocated site at Westley or Rougham Airfield should have selected as they were "better" and would have caused less harm in transport and ecology terms.

The ES Chapter 4 examined alternative sites.

146. For the Westley site the document says at para 4.6.28.

Site acquisition and planning approval was considered complex due to options that are held by a current investor, third party land acquisition required to complete the relief road (a fundamental requirement to satisfy planning), and difficulties relating to a current planning application

147. For the Rougham Airfield site the document says at para 4.6.38

The Site is in single ownership, and whilst initial discussions with the land owner and developer resulted in supportive dialogue for a hospital on the Site, acquisition was still considered a fundamental risk. Whilst it is anticipated that a "heads of terms" agreement could be finalised expeditiously, the conclusion of the agreement would be subject to surety on planning matters.

148. The documents set out that the Site Appraisal exercise concluded that the overriding factor in selecting Hardwick Manor as the preferred site, was the affordability of the project in comparison to other sites which the Trust states is a reflection of being able to retain significant existing estate in close proximity to the new site.

149. The Trust also state that;

The risk and timescales involved in site acquisition is another significant factor in selecting the preferred site, as unlike Hardwick Manor, which is in Trust ownership, the delivery of both Westley and Rougham are considered high risk as they both rely on major land deals to facilitate their development.

150. Officers note that the submitted details for the sequential test (flooding) discusses acquisition risk and say:

Site acquisition is considered a major project risk by the Department of Health (DoH), who require evidence that a proposed site is available (via legal option agreement) prior to the approval of an Outline Business Case. The risk relates to the overall deliverability of the project (if a land deal cannot ultimately be secured) and to the timescales involved in securing a land deal at a market rate.

151. For most planning applications site selection is not a material consideration. However, given that the Local Plan allocates the proposed development on another site (Bury West CS11 of the Core Strategy) this requires discussion. Additionally, as is discussed in the Surface Water Drainage and ecology sections below, alternative sites which are not prone to flooding and avoid harm to ecology should be used before sites which do harm ecology and are prone to flooding, as such, site selection is material to the decision-making process. The cost comparisons of each site have not been independently verified by the LPA. However regardless of this, the applicant sets out that the benefit of the application site is that it is owned by them and as such is the most deliverable site. This is because if planning permission is granted, they are able to move forward immediately with their Outline Business Case to deliver the development on land they own. Accordingly, officers are satisfied that the proposed site is the most deliverable site for a new hospital. In any event, the Local Planning Authority is required to deal with the application before them and in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Conclusions on the principle of the change of use element of the Development – Hardwick Manor

152. Policy DM15 sets out that proposals to change the use of a listed building will be permitted where certain criteria are met. The Statutory Development plan doesn't have any spatial criteria where the change of use of a listed building would be acceptable or not acceptable. The overall impact of the development on the listed building is discussed later on at paragraphs 286-297 the heritage section of the report but officers are satisfied that the change of use of this listed building from a residential use to another use does not positively or negatively sway the starting position of the initial assessment of the principle of development.

Initial assessment of the principle of development.

153. Officers are satisfied that the starting position of the assessment of the application is that as a whole the application is contrary to the countryside policies of the development plan and that significant weight should be attributed to this clear breach of development plan policies. However, before any final assessment is made, it is first necessary to consider whether the application proposals might be supported by or offend any other policies of the Statutory Development Plan. It is also appropriate to consider the influence of relevant national planning policies and guidance. This will establish whether there are other material considerations that will influence the final decision (either positively or negatively).

Beyond the principle of development

154. The report establishes that the development proposals are contrary to the provisions of the development plan and discusses how that should be approached in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004. This section of the report examines the other material issues raised by the planning application proposals in order to establish whether there are any other factors (including policy or site specific) which add material weight to the final decision.

155. Apart from the principle of development, the following matters are considered central to the consideration of this planning application:

- Transport matters including sustainable transport and car parking
- Ecology
- Landscape and visual impacts
- Impact on trees
- Protection of water quality and resources and flood risk management (including surface water drainage)
- Heritage Impacts
- Impact on Residential Amenity (construction and operational phase)
- Land Contamination
- Air Quality
- Energy and Sustainability Energy Carbon net zero/ BREEAM
- Planning Obligations
- Other matters

Transport matters including sustainable transport and car parking

156. This section discusses the impact of the development on the local highway network and the Strategic Road Network (A14 and its junction) from a vehicular traffic perspective, both during the construction and operational phases of the development. It will also examine how sustainable modes of transport are provided for, both on and off the site.

157. Hardwick Lane already serves as the vehicular access to the existing District General Hospital and that would not change under the proposal. However, the proposal seeks consent for a larger hospital which would be up to 100,000m² in size. It is unclear at this stage as to precisely how large the proposed new hospital would be, which is largely dependent on the amount of government funding that is awarded. It may be that if planning permission is granted, a new hospital would be brought forward that is only be 80,000m². Nevertheless, the supporting details are based on the "worst-case scenario" and so a 100,000m² hospital has been tested within the submitted Transport Assessment. The existing hospital is 44,000 m².

158. The uplift from the current hospital size to the proposed worse case (100,000m²) once adjusted for modern spaces standards is 38%. The TA traffic uplift factor is based on a 25% uplift. This approach was agreed with the Highway Authority after discussions to understand and acknowledge the following;

- The traffic survey included three units, which are non-NHS uses on the wider campus (the hospice, Busy Bees nursery and the Wedgwood Unit) and do not form part of the proposals. The Applicant has set out that they equate to 9% of the total floor area on the campus, and movements to/from these units should not be uplifted, as they are not proposed to change.
- That NHS has a long term plan to target 30% of outpatient visits to be virtual over the next ten years. At a local level West Suffolk Hospital has a target to drop outpatient visits by 25% over the next 10 years by becoming virtual.
- The Applicant has discounted a proportion of the increase to reflect the potential for greater levels of working from home for non-front line staff;

159. Evidence was provided on these reductions and it was determined that the reduction in movements to reflect the non-NHS floor area did not appear unreasonable. There was also reasonable evidence to support the reduction in outpatient numbers provided, and the proposed changes in travel patterns as a result of working from home was reviewed against some available data and again considered not unreasonable given that it would have limited impact on the overall conclusions.
160. The highway authority also sense checked this against other indicators which were as follows;
- the maximum possible increase in on-site car parking which is 23% Other increase in beds which is 31% ($603 / 460 = 31\%$),
 - forecast increase in total staff 11% ($5,226 / 4,716 = 11\%$)
 - anticipated increase in staff numbers based at the hospital equate to 30% ($5,226 / 4,020$).
161. On this basis, as the proposed uplift sat towards the higher end of the ranges identified and, given the potential changes in operational and working patterns, that either have occurred or are in the process of occurring, and that no adjustment has been made for modal shift as a result of the sustainable infrastructure being provided, the conclusion was reached that the 25% uplift was considered reasonable.
162. Clearly, transport as a whole and the impact the development would have on the highway network is an important matter and one that is of great concern to residents who live near any hospital but also by those who will travel to and from the hospital either because they work there or because they are a visitor or a patient. The application has been subject to extensive engagement between Suffolk County Council as the Highway Authority and National Highways at both pre application stage and during the lifetime of the planning application.
163. Para 111 of the NPPF says that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Policy DM45 of the JDMPD also echoes this and sets out that where a Transport Assessment does not demonstrate that the travel impacts arising from the development will be satisfactorily mitigated or adequate sustainable modes of transport would be in place then permission will not be granted.
164. Planning policies both locally and nationally relating to transport are extensive. Planning Policy CS7 sets out that there is a hierarchy of transport modes which is as follows
- Walking
 - Cycling
 - Public transport
 - Commercial vehicles
 - Cars
165. This means that pedestrians, cyclists and public transport must be prioritised above the motor vehicle. CS7 also sets out that the LPA will seek to reduce the need to travel through spatial planning and that development

that generates significant amounts of traffic will be required to have a transport assessment and travel plan showing how car based travel will be minimised. Other policies within the Core strategy which are relevant are CS2, CS3, CS8 CS14. Elsewhere within the Statutory Development Plan policies DM2, DM44, DM45 of the JDMPD and BV26 of the Bury Vision document are relevant. These policies set out that development should;

- minimise the need to travel;
- address access and transport considerations;
- deliver necessary improvements to junctions to minimise congestion in Bury St Edmunds;
- help achieve the objectives to the Right of Way Improvement Plan which seeks to increase access to the countryside amongst other things;
- improve sustainable transport links between new neighbourhoods and town centres and other destinations and settlements;
- supported by Transport Assessments and Travel Plans where appropriate.

166. The NPPF echoes much of the above in Chapter 9 which is entitled "Promoting sustainable transport". Setting out that opportunities to promote walking, cycling and public transport use are identified and pursued, that priority is given to pedestrian and cycle movements and that places are created that are safe, secure and attractive which minimise the scope for conflict between pedestrians, cyclists and motor vehicles.
167. Finally Gear Change (published in July 2020) sets out that the Government has a bold vision for England concerning walking and cycling. This document with its 4 Themes and 22 principles sets out that planning for walking and cycling can no longer be an afterthought. Indeed, the document sets an ambitious target:
168. "*Places will be truly walkable. A travel revolution in our streets, towns and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030.*"
169. The guidance acknowledges that for this aspiration to be met, high quality walking and cycling infrastructure is necessary.
170. When the proposal was consulted on at pre application stage by the WSFT and originally submitted to the LPA the development included a new roundabout on Hardwick Lane. This roundabout would have been the main point of egress and exit to the site and was positioned to the western end of the Hardwick Lane existing frontage. During the first period of consultation the Highway Authority consultation response set out that the proposed roundabout was not considered safe for motorists or cyclists. As such the design of the roundabout did not follow the mode of transport hierarchy which prioritises walking, cycling and public transport above private motor vehicles.
171. To address this the application was amended and the roundabout was replaced with a light controlled junction. In addition, the proposal now includes a dedicated entrance and exit for public buses and the existing main vehicular entrance retained to serve one car park and the service vehicles to the site. There would also be three separate points for pedestrians and cyclists to enter the site from Hardwick Lane.

172. The bus egress and exit would allow for public buses to collect/ drop off passengers immediately inside the site. This collection/ drop off area would allow for those who have arrived at the site by bus, foot and those who have parked on nearby car parks to travel onto the new hospital building by the on site electric shuttle bus. It is planned that the electric shuttle bus would remain on site running in a loop between the new hospital and the main public bus facility and possibly stopping at one other stop in between to ensure that those who arrive by sustainable modes of transport can be taken to the entrance of the new hospital.

Off site sustainable route improvements

173. There are a number of significant key off site sustainable transport routes that the development is committed to delivering. These have been developed by the applicant over a number of months following extensive engagement with the Rights of Way team and the Highway Authority at Suffolk County Council. They are listed as follows;

- **Walking and Cycling Route A** – Station Hill to Hardwick Lane including Water Meadow Boardwalk
- **Walking and Cycling Route B** – Rembrandt Way/ Barons Road and Laundry Lane
- **Walking and Cycling Route C** – New Hospital – Horringer
- **Walking and Cycling Route D** – New Hospital to Sicklesmere Road across Hardwick Heath/ Fallowfield Walk/ Mayfield Road/ Old Town Lane/ Plovers Way
- **River Linnet Walking and Cycling Route**

174. Route A is viewed as a key route in order to ensure that the development is accessible by foot or bicycle by those who have travelled to the town by train. Of particular importance in this route is making the current cycle track that crosses the Water meadows usable all year round. Presently this route is unusable when there are periods of high rain fall. The applicant has agreed to bring forward a 4-metre-wide boardwalk that will ensure that the new hospital can be accessed directly by foot or bicycle even when the water meadows flood. Other minor improvements may be required along this route particularly along St Andrews Street North/ Tayfen Road and Station Hill.

175. The River Linnet improvements will tarmac an existing unsurfaced route that starts at Flemyn Road and continues for approximately 735 metres linking into an existing tarmac route at the footbridge that links Hervey Road with Constable Road that carries onto the Spread Eagle Junction. This will help create a car free route to the Spread Eagle junction from the Horringer Estate and the Westley Estate which will in turn link into Walking and Cycling Route B. This route aims to serve those who are walking or cycling to the new hospital and create improvements along Rembrandt Way/ Barons Road which in turn will link into existing routes onto Hardwick Lane and into the site. Other improvements on Route B aim to link into existing routes that serve the western parts of the Moreton Hall estate.

176. Route D ultimately aims to create a car free route from the later phases of the Moreton Hall estate running under the A14 near the Suffolk Business Park Extension through the new Bury SE development that is consented but not built. These routes are either in place now or will be delivered by the

Bury SE development itself. However, Route D would plug into Bury SE at Sicklesmere Road and link that urban extension to the new hospital with a new car free route that joins into the hospital site from Hardwick Heath.

177. Finally, the development would secure funding to create a sustainable link from the new hospital to the village of Horringer which is located approximately 2km to the west. Planning policies require development to seek opportunities to enhance public rights of way, increase access to the countryside and create links between settlements. The scheme would secure £668,964.80 funding for this route so that the SCC Rights of Way team could bring such a route forward before the new hospital opens. This contribution has been discussed between the applicant and officers in order to ensure that it is in compliance with the CIL regulations as concern was raised that such a route would only serve a relatively small settlement. One of the CIL tests is would the obligation be in keeping with the scale of the development. £668,964.80 would represent less than 0.1% of the total budget of the scheme so officers are entirely satisfied that this is an appropriate sum of money. The second test is would the obligation relate to the development and that test is plainly met as people would be able to travel sustainably to the new hospital from this existing development. The last test asks, is the obligation necessary to make the development acceptable. The Highway Authority and the Rights of Way Team are entirely satisfied that this route and the other sustainable route discussed above are all necessary to make the development acceptable. The Local Plan advocates for such routes under policies CS2, CS7, CS8 and CS14 of the Core Strategy and DM2 and DM44 of the JDMPD. Policies CS8 and DM44 make explicit reference to development delivering the aims and objectives of the Rights of Way and Improvement Plan which sets out significant public rights of way improvements and legacies on nationally important development projects shall be obtained. The applicant is clear in their position that the scheme represents a nationally important piece of infrastructure, and the LPA agrees with this as explained in full under the ecology part of the report. Lastly from the local plan perspective Project D.2 of the Green Infrastructure Strategy seeks to deliver a radial walking, cycle route of Bury St Edmunds which links into Horringer. Policy BV26 requires that the green infrastructure projects are delivered by new development and so this route would help the development accord with that policy.
178. It is also worth noting the NHS England document "Delivering a Net Zero National Health Service" also promotes such infrastructure. It says that shifting away from cars and towards cycling, walking and public transport decreases air pollution, improves physical activity and increases access to care for patients. NHS Trusts should target interventions that encourage staff and patients to reduce vehicle use such as improved cycle paths, storage and shower facilities. This is considered a material consideration in the decision making process and a document that the WSFT have to have regard to themselves.
179. Given the proposed hospitals location, which in reality will be harder for most people to access by foot or bicycle, it is considered that the proposed cycle and footpath infrastructure improvements are entirely necessary and appropriate. Whilst their inclusion helps mitigate the developments overall impact on the highway network they are also a requirement of the development in order for the development to be considered acceptable in sustainable transport planning policy terms. They enable the application to

demonstrate that the transport mode hierarchy is being followed and the improvements are necessary.

On site routes

180. The Access and Parameter Plan shows how the development would be broadly laid out to allow pedestrians, cyclists and motor vehicles to move around the site. Whilst these routes are shown they are not fixed and the application sets out that they can move in any direction by up to 2 metres. If the development were approved, later reserved matters applications would secure the final details. The proposed access arrangements on Hardwick Lane are part of the application. These details show that separate walking and cycling routes are proposed along the Hardwick Lane frontage and into the site from Hardwick Lane at the three separate points. The submitted details also show that separated walking and cycling routes would continue into the site to the new hospital.
181. No weight can be given to objections that other sites should have been selected or are perceived to be better or cause less harm in relation to transport matters. The LPA is required to determine all applications which are formally submitted to it, against the provisions of the Statutory Development Plan and all other material considerations. It would be unlawful to refuse any application that was considered, on balance, acceptable, simply because it was perceived another site would be less harmful in transport terms
182. The East of England Ambulance Service raised some queries to the original submission. These related to what arrangements there would be in the event of incident occurring at either the proposed roundabout or anywhere along the primary route between the roundabout and the proposed new hospital. As officers understand it a road traffic accident had occurred on a roundabout that served a hospital in Essex which had significantly hampered ambulances getting to and from that hospital. With the replacement of the proposed roundabout with a dedicated bus entrance and egress and a light controlled junction this gives the opportunity of ambulances using the dedicated bus access in the event of the light-controlled access becoming unavailable for whatever reason. The amended layout is considered to provide a more resilient set of accesses with the highway for blue light traffic. Additionally, the primary route has been widened to 6.9 metres, which would allow space for motor vehicles to pull over and allow blue light traffic to pass. In the event that this internal road became temporarily unusable the submitted details show that the adjoining cycle/ footway (which totals 5 metres in width) could be given over to blue light traffic only until the internal road was made available again. Whilst ensuring adequate access for emergency vehicles properly rests with the Trust, it is considered that the submitted details demonstrate that the proposed layout would have significant resilience and would allow blue light traffic to continue to travel to and from the proposed hospital in the event of an incident. Additionally, no concerns have been raised in this respect from SCC Highways.

Impact on local junctions

183. After the second period of consultation the Highway Authority continued to raise concerns that insufficient modelling had been carried out on the

following highway junctions around the town;

- The Spread Eagle junction
- The proposed light controlled junction that would serve the site on Hardwick Lane
- The Wilkes Road/ Cullum Road/ Nowton road roundabout
- The Rougham Hill Roundabout

184. In addition, National Highways raised concerns about the development's impact on Junction 42 (Westley) of the A14. Both highway authorities requested additional modelling be carried out that demonstrated the junctions would function acceptably if the development came forward. Since that time such modelling has been carried out by the WSFT transport consultants and submitted to the respective Highway Authorities for them to assess. The Highway Authority have confirmed that the development will not cause any severe impacts on the junctions listed above and that the development will not have an unacceptable impact on the local highway network. National Highways have confirmed that they are happy for the development to proceed but have requested a monitoring condition that would potentially see the development deliver some mitigation on J42 of the A14 if it was later found that the development had caused some unacceptable queuing onto the live lane of the A14.
185. The proposal before the LPA will create significant amounts of traffic. Even if the expected changes to the ways in which health care are delivered in the community are realised the new hospital will continue to generate significant amounts of traffic. Indeed, the Transport Assessment submitted by the applicant acknowledges that there will be an increase in the amount of motorised vehicles travelling to the site if the proposed development is brought forward. As will be discussed in greater depth in the next section the new facility will have more car parking and that is likely to be utilised. The application has been robustly scrutinised by the Highway Authority and National Highways and the applicant has had to supply additional information in order for the highway authorities to conclude the scheme is acceptable. The application has unquestionably looked at making itself more accessible by sustainable modes of transport. The development, which is supported by a Travel Plan would bring forward a number of significant off site improvements that will make walking and cycling to the site safer, calmer, easier and overall a much more attractive prospect from different locations around the town and from Horringer. The site which at present has little or no dedicated walking and cycling infrastructure, would be transformed in this regard. Accordingly, officers are satisfied that the proposal prioritises sustainable modes of transport, giving the option to those who can travel to the site sustainability, the opportunity to do so. Furthermore, the application has demonstrated that it would not give rise to unacceptable/severe impacts on the local or strategic road network.

Secondary vehicular access linking the A143 with Hardwick Manor site

186. A number of objections have been received throughout the life of the planning application making the point that the current levels of congestion on the local highway network are sufficiently severe that a larger hospital would be unacceptable. As a solution the suggestion has been made that a second vehicular access into the western boundary of the Hardwick Manor site should be provided and that Gypsy Lane is either upgraded or a new

link road is delivered that would create a direct access from the A143 to the new hospital. This would allow drivers coming from Haverhill and elsewhere along the A143 to access the hospital without traveling via the Spread-Eagle junction. The suggested proposed secondary vehicular access was also raised during the pre-application consultation, and this is acknowledged in the Statement of Community Involvement that supports the application. Reference was also made to a planning application for up to 220 dwellings that had sought to show the option of a new link road between the A143 and the new hospital site. That application was contrary to the development plan and has now been withdrawn.

187. The proposal does not include a secondary access with link to the A143 and needs to be considered on its own merits. Moreover, the Highway Authority has scrutinised the application extensively, requiring that the applicant comprehensively demonstrates that the proposal is acceptable in transport terms. As set out above they are satisfied that the proposal as it stands is acceptable in highway terms and that there will not be a severe impact on the road network.

On site Car Parking

188. As discussed above it is not known at this stage what the final floor area of the new hospital would be if it was brought forward. Currently there are 1613 car parking spaces on site that serve the WSFT. The WSFT also operate a park and ride scheme for staff which operates out of the Bury Str Edmunds Rugby Club on Rougham Hill. This arrangement is something that the WSFT have run for several years for the benefit of their staff and is reviewed and renewed annually if both the Rugby Club and the WSFT agree to do so.
189. Using Suffolk County Council's car parking standards, a 100,000m² hospital could generate a maximum permissible car park provision of 2,159 spaces. The application sets out that the site could accommodate such an amount of car parking either by surface car parking or by a multi storey car park. If the maximum amount of car parking was brought forward this would be an increase in the amount of onsite car parking by 546 spaces. It should be noted that these numbers exclude car parking that currently serves the Wedgewood building, the onsite nursery, and the Hospice. These specific car parking spaces would not be altered by the development and total 137 spaces.
190. Both the Highway Authority and officers are satisfied that the necessary amount of car parking could be delivered on the site should a hospital come forward that was 100,000m² in size. This quantum would accord with Policy DM46 which requires that all development delivers the appropriate amount of car parking. However, the submitted details acknowledge that because the current hospital will need to continue to function until the new hospital is opened not all the car parking shown could be brought forward, when the new hospital opens, as some of the surface car parking and/or the multi storey car park rely on the current hospital being demolished before they can come forward.
191. The Trust has explained that when the new hospital is opened there will be approximately 1,460 car parking spaces available, meaning there will be a theoretical shortfall against the maximum permissible spaces of 698 spaces

for a period of approximately 12 months (the length of time it is anticipated it will take to demolish the current hospital and deliver the remaining car parking). The forward planning by the WSFT involves some demand and capacity modelling exercises for the new hospital for the year 2029 (the most likely year of opening). This predicts that 1,835 spaces will more likely be required for the first 12-month period, as the new hospital will not be operating at full capacity during that period. This would mean that a more realistic shortfall in car parking spaces would be in the order of 374 spaces for that first 12-month period.

192. It is acknowledged by the WSFT that an action plan will be required to manage the shortfall in car park provision for the first 12 months of the new hospital opening. Accordingly, it is proposed that a condition be attached to any permission that would require the Trust to submit to the LPA and have approved in writing a strategy for dealing with the shortfall in car parking from the period of the new hospital opening until the final approved car parking is delivered and made available. The applicant has been assessing their potential options and have set out that the solution could involve the following;
- Securing the Rugby Club parking until all car parking is constructed (300 spaces);
 - Securing the construction compound field for a longer term to provide a temporary staff car park (390 spaces);
 - Construction of a temporary deck car park over Car Park A (potential arrangement below), subject to planning approval (approx. 340 spaces assuming two storey construction and including loss of spaces for columns and ramp at ground level). This is not a favoured option due to the high capital cost that it would attract but would be a fall back position;
 - Implement enhanced Travel Plan measures for this period including staff car sharing and increased working at home provision for non-front of house (approximately 42%) staff;
 - Other off-site car park solutions.
193. Whilst the planning application has to assume the "worst case scenario" which in this case is a 100,000m² building it must be acknowledged that if a smaller building does come forward at reserved matters stage then the shortfall of 374 spaces would be less. Additionally, it must also be acknowledged that the hospital has in the past carried out development on their site that has during the construction phase reduced the amount of car parking available. Of particular note is that during the construction of the three new staff accommodation blocks there was a prolonged period where over 100 car spaces were lost. Whilst the amount of car parking spaces anticipated to be lost is greater than 100 and the period of time is also longer it is worth acknowledging that a reduction of some car parking spaces on site for the 12 month period may be part of the overall strategy that comes forward. That said, the management and mitigation of such would be secured by a planning condition.

Construction compound traffic generation and parking

194. The application site includes a large parcel of land to the west of the proposed hospital site for a construction compound. This parcel of land forms part of a wider field that is farmed for crops. The Trust has secured an option to use part of the field for the duration of the build phase for a construction compound. The build phase may last up to 3 years with the

demolition of the hospital taking another 12-18 months.

195. The details submitted show that the construction compound would be accessed by vehicular traffic bringing materials and staff to site from the western end of Gypsy Lane which immediately links into the B1066/A143. The construction compound would accommodate parking for roughly 390 vehicles for the construction staff, a lay down area for materials and soil and temporary cabins that would serve as offices and welfare facilities. The layout of the compound is not known at this stage and would be worked up by the lead contractor when they are appointed. It is considered necessary to condition the final layout in order to minimise the impact arising from the compound. The construction compound would be linked to the Hardwick Manor site by a temporary access onto Horsecroft Road and then another temporary access directly on the other side of Horsecroft Road through the western tree belt and into Hardwick Manor. This would enable vehicles and pedestrians to directly cross Horsecroft Road from the construction compound safely via a priority-controlled access with minimal disruption to Horsecroft Road.
196. Horringer cum Ickworth Parish Council has raised concerns regarding the access at the western end of the construction compound which is off Gypsy Lane that links into the B1066. The Parish Council set out that:
197. *The drawings illustrate the swept path of an HGV entering and leaving the site compound and rather confirm our concerns relating to conflicting traffic movements at what is, in effect, a complicated staggered junction. Also, the exit from south and entry from north paths appear to be in conflict with traffic in opposing directions (ie A143 and Gypsy Lane) although it is difficult to be precise at the scale that is used. We are also concerned about cyclists safely negotiating the junction at this point.*
198. *No traffic management proposals are proposed and consequently the Parish Council maintain their objection to this aspect of the application and request that the applicants and the local highway authority look more closely at the impact of the site compound access on traffic movement and highway safety at this junction.*
199. The Highway Authority has reviewed this element of the proposal and are satisfied that it is acceptable. They highlight that Gypsy Lane narrows to a single vehicle width east of the compound access and is not wide enough to enable construction traffic to pass on Gypsy Lane. Therefore, it would not be appropriate to locate the compound access further east along Gypsy Lane. In addition, they set out that the departure manoeuvres of site traffic towards the A143 will be regulated by the give way lines at the western end of Gypsy Lane and at the A143 junction. This will keep construction vehicle departure speeds very low. Arriving site traffic will turn into Gypsy Lane before entering the site. Traffic movement numbers on Gypsy Lane are low so the right turn from Gypsy Lane into the compound is acceptable. Finally, they acknowledge that the compound access will be a minimum width of 7.2m, so are satisfied that construction vehicles will be able to pass on-site, as opposed to having to wait on the carriageway. Accordingly, officers are satisfied that this element is acceptable in highway safety terms.

200. The application is supported by a Framework Construction Logistics Plan. This document sets out that a new haulage road would be provided which runs parallel with the southern side of Gypsy Lane and that it would be a minimum of 5.5m wide to enable 2 HGVs to pass each other. The compound will provide sufficient space for 390 parking spaces associated with construction staff during the most intense period of the construction.
201. The construction phase of the project is expected to last approximately three years. Based on a desk top review of construction traffic data from pre-existing Construction Logistic Plans associated with other hospital expansions, it is considered that there would be a maximum peak of 200 two-way HGV construction traffic movements per day during the construction phase (i.e. 100 HGV arrivals and 100 HGV departures per day). The above daily HGV construction traffic generation equates to an average of 10 HGV arrivals and 10 HGV departures per hour based on a 10 hour working day. All vehicle movements will be scheduled and will follow the designated routes.
202. Information on the demolition phase of the contract has been provided by a specialist contractor. The demolition phase is expected to last between 24 and 27 weeks with between 8 to 25 staff expected. The higher number will be required at the start of the demolition phase until all asbestos is removed and any soft strip is complete. Final staff numbers and the demolition phase duration will be confirmed in a Detailed Construction Logistics Plan. Demolition vehicle access will be to / from Hardwick Lane, there is predicted to be in the order of around 3 to 5 HGV trips generated per day throughout most of the demolition phase. At certain times, for example when concrete is being removed, there is predicted to be around 15 to 20 HGV trips generated per day.
203. Having considered this issue, and that there does appear to be a number of very realistic options that the WSFT could secure, conditioning that a strategy should be submitted to and agreed in writing in writing before the new hospital is opened so the LPA can be confident that appropriate mitigation is deployed is considered acceptable.

Ecology

204. The NPPF confirms the planning system should contribute to and enhance the natural environment by among other things minimising impacts on biodiversity and providing net gains where possible. The NPPF states that protection of designated sites should be commensurate with the status of the site, recognising the hierarchy of international, national and local designations.
205. Core Strategy policy CS2 seeks to secure high quality, sustainable new development by protecting and enhancing biodiversity, features of the development site, wildlife, geodiversity and protected habitats
206. Policy DM2 of the JDMPD sets out the Councils requirements and aspirations for achieving design quality. One of these requirements is that development should not adversely affect sites, habitats, species and features of ecological interest. Policy DM10 sets out more detailed requirements relating to potential impacts upon sites of biodiversity and geodiversity interests. This

policy, which is echoed in para 180 (a) of the NPPF says that development should adhere to the biodiversity mitigation hierarchy which requires harm to biodiversity to be avoided in the first instance. If it cannot be avoided, it should be mitigated and if it cannot be mitigated it should be compensated. Policy DM11 specifically relates to protected species. Policy DM12 seeks to secure biodiversity enhancements from new developments where possible.

207. Officers are satisfied as discussed in paragraphs 145-151 that harm to ecology cannot be avoided as there are no other sites available to the WSFT. This is because Hardwick Manor is the only site that is considered to be deliverable within the applicant's time constraints. Regardless of this position the application will still need to avoid harm where possible and officers have been very aware of this as the scheme has developed over time.
208. Understanding the complexities of the site from an ecology perspective has been a collaborative process between the applicant's ecology team, the Suffolk Wildlife Trust and the council's ecology officer at Place Services. Gaining a comprehensive knowledge of the site has taken time and evolved. The proposal that is before the LPA now has changed significantly from early pre application discussions as a result of understanding the ecological sensitivities in a more comprehensive manner. This has also led to developing the submitted mitigation and compensation measures which seek to minimise the harm that the proposal causes.
209. Some of the notable changes/additional information to support the scheme that have been submitted since the application was formally presented to the LPA relating to ecology include;
 - Clarifying where regrading of land will occur in order to ensure that the buffer areas of veteran trees are not encroached upon.
 - Submitting drawing no. 2100 Rev P6 entitled "Proposed Zones of restricted Access" in order to understand where the public will be able to go on the site once the hospital opens to understand where potential harm to ecology could occur after the construction phase.
 - Submitting drawing no. 2001 Rev P11 entitled "Developable Area for Proposed Works" in order to quantify how much of the Irreplaceable habitat will be lost.
 - Extinguishing part of the existing access to Hardwick Manor house and proposing alternative routes to the house which would not be in the buffer zone of veteran trees.
 - Submitting a compensation strategy
210. It is clear that the application site represents a multi-faceted ecosystem which is extremely complex and interconnected. The different ecological features on or near the site range from having a Local importance to that of National importance. Included in these are Sites of Special Scientific Importance (located approximately 1km to the west) and Habitats of Principal Importance. Of particular note is that the vast majority of the Hardwick Manor site is considered Wood Pasture Parkland (UK BAP Priority Habitat) and includes Waxcap Grassland which contains species assemblages of regional importance. Additionally, that part of the site contains 20 Veteran trees and 39 advanced candidate veteran trees. It is agreed that these three ecological features are all classified as Irreplaceable Habitats.

211. Irreplaceable habitat is described in the Glossary of the NPPF as habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.
212. Para 180(c) of the NPPF says;
development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists;
213. Footnote 63 of the NPPF says
For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.
214. Nationally significant infrastructure projects (NSIP) are major infrastructure developments that are given planning permission via a Development Consent Order. An order made under the Transport and Works Act 1992 (the TWA) is the usual way of authorising a new railway or tramway scheme in England and Wales, except for nationally significant rail schemes in England which require Development Consent Order. Examples of hybrid bills include those which led to the construction of the Channel Tunnel and Crossrail, and those which made provision for the HS2 rail network.
215. Officers have considered if a new District General Hospital can be considered a *wholly exceptional reason* to allow for the loss or harm of irreplaceable habitat. As discussed above the proposal forms part of the Health Infrastructure Plan (HIP) which seeks to deliver 40 new hospitals between 2020 and 2030 in the UK. Officers are satisfied that this test has been met and that the proposal can be classified as wholly exceptional. Footnote 63 doesn't limit wholly exceptional reasons to those projects which are given as an example. In this instance the project is clearly a significant piece of infrastructure which forms a part of a nationally important programme of infrastructure. Accordingly, the public benefits will need weighing against the loss or deterioration of the irreplaceable habitat and the proposal will need to secure a suitable compensation strategy if it is to be acceptable.

The compensation strategy

216. This submitted document confirms that the total area of irreplaceable habitat to be lost as a result of the West Suffolk hospital project, as shown on drawing 2001 Rev P11 is 11.1 hectares, with an additional 0.4 hectares anticipated for loss due to temporary works such as utilities installation.
217. Following the principle of avoided harm where possible the proposal would leave approximately half of the existing waxcap grassland as retained on the wider Hardwick Manor site. The current areas of waxcap grassland for retention are shown outside the impact footprint of the development on drawing 2001 Rev P11. All proposed landscaping is also included in areas lost where it falls within irreplaceable habitat, as planting will alter the grassland communities and is expected to become unfavourable for waxcap

fungi species within these localised areas. Measures to protect these areas during construction will be necessary and is proposed to be conditioned.

218. Prior to any compensation development works, an appropriate parcel of land is required to be secured upon which the waxcap grassland/wood-pasture parkland can be created as part of biodiversity compensation. The strategy sets out that to compensate for the loss of 11.5 hectares of waxcap grassland, a minimum of 115 hectares waxcap grassland/wood-pasture and parkland needs to be created. Furthermore, a management strategy will be necessary to cover a minimum 30 years post habitat creation, given the nature of waxcap grassland and the decades taken to develop, any land used for compensation must be secured in perpetuity to ensure that created habitats remain beyond the 30 year minimum management period.
219. The following criteria have been agreed with the Ecologists at Place Services, Suffolk Wildlife Trust and are all preferred conditions to be met by any chosen land for compensation. The list is in approximate order of importance, and as it is highly unlikely that all these conditions will be met, the chosen compensation land must meet as many of these conditions as possible in approximate order:
 - Grassland habitat that has been reverted from arable within the last few decades
 - Abiotic conditions matching Hardwick Manor as closely as possible (details as per proposed soil sampling)
 - Variety of microclimates (eg areas of open field, open grassland, locations with surrounding woodland belt for variety of micro-climates and habitats)
 - Varying soil conditions across the compensation site, such as some sandy soils, some calcareous soils etc
 - As geographically close to the existing Hardwick Manor site as possible, no further than 30km from Hardwick Manor site
220. As part of this compensation strategy, it is proposed to translocate approximately 1 hectare of the existing waxcap grassland at Hardwick Manor onto the compensation site. With an anticipated turf size of 2 metres x 1 metre, this would result in translocation of 5,000 waxcap turf segments, which will be appropriately distributed across the receptor site; distribution will be influenced by the final receptor site when finalised and controlled by condition.
221. The compensation strategy sets out that prior to any disturbance of the Hardwick Manor site (including trial trench investigation required by the Archaeological Service or bringing materials or vehicles onto the site for any reason) the translocation of turfs, to an agreed appropriate donor site must be undertaken. The translocation of turfs will focus on moving sections from the area of waxcap grassland that will be destroyed by the development of the site for the construction of the hospital and associated infrastructure and landscaping that contain a combination of the highest number of fungi species, and the rarest; where areas across Hardwick Manor may contain either a higher density of species or rarer species, an appropriate ratio between different areas will be selected. Current results of the fungi surveys from 2021 provide an overview of areas that may be best suited, but the eDNA surveys currently being conducted are expected to provide a clearer indication of any particularly valuable areas of the Hardwick Manor site.

Securing 115 hectares for the necessary compensation

222. The WSFT has not secured any land for compensation at this time. However, discussions are ongoing regarding a parcel of land that would meet the criteria listed above. The WSFT fully acknowledge and accept that the LPA has a duty to ensure that the compensation strategy is delivered. Accordingly, the WSFT has set out that they are comfortable with a Grampian condition before any disturbance (including bringing machinery plant or materials onto the site) of the site occurs that requires them to provide the detail of the site and how the compensation strategy would be delivered on that site. Those details to be submitted and agreed will expand on the Compensation Strategy and how it will relate to the site they have secured. The condition would require the following to be submitted to and agreed in writing;
- a) purpose and conservation objectives for the proposed offsite compensation measures;
 - b) detailed designs to achieve the stated conservation objectives;
 - c) locations of proposed compensation measures by appropriate maps and plans;
 - d) persons responsible for implementing the compensation measures;
 - e) details of initial aftercare and long-term maintenance to meet the required objectives.
 - f) confirmation and full details of the proposed legal mechanism to secure and deliver the land required to compensate for the loss of irreplaceable habitat in general accordance with the "Loss of Irreplaceable Habitat Document Reference: 65206048-SWE-ZZ-XX-RP-J-0001 Rev C01". The details submitted shall demonstrate that the land has been secured for at least 125 years in accordance with the conservation objectives.
 - g) details of the maintenance including funding mechanism and timeframe (which shall be at least 30 Years) for the maintenance and ongoing monitoring; and persons responsible for maintenance and monitoring
 - h) a timetable for implementation of the compensation measures.
223. Owing to the fact that the objective of the compensation strategy is to recreate something that is irreplaceable the length of time that the site is secured for is material to the acceptability of the overall compensation strategy. 125 years is defined as "perpetuity" under the Perpetuities and Accumulations Act 2009. It may be that the applicant secures a parcel of land for a greater period of time to deliver the compensation, but the minimum period is considered acceptable to both the Suffolk Wildlife trust and the Place Services Ecologist. The maintenance of the compensation site between years 31 and 125 is considered to be self financing via farming practices like grazing of sheep.
224. A method statement and timings of the waxcap grassland translocation would be secured by a separate condition. However, the waxcap grassland would need to be translocated before any other disturbance of the Hardwick manor Site occurred including the necessary Archaeological trial trenching.
225. The submitted compensation strategy has enabled the Suffolk Wildlife Trust and the council's ecologist from Place Services to remove their objection to the scheme subject to the compensation strategy being delivered and a number of other conditions being attached to any permission which will ensure that harm is avoided during construction and once the new hospital

site is opened to the general public. Other conditions also seek mitigation and are considered appropriate and necessary.

Biodiversity Net Gain (BNG)

226. The Environment Act 2021 contains provisions for the protection and improvement of the environment, including introducing biodiversity net gain (BNG). Whilst the provisions are not yet in force, the NPPF and planning policies already required development to seek enhancements in biodiversity. Due to the nature of irreplaceable habitats, the areas of Wood-pasture and Parkland/ waxcap grassland to be lost are excluded from BNG calculations. All other habitats on site will be subject to achieving a 10% net gain in biodiversity, calculated using the Biodiversity Net Gain calculator version 3.0. The application acknowledges that the proposal, as a whole cannot be considered to deliver an overall biodiversity net gain, due to the loss of irreplaceable habitats. However, all other habitats affected will be subject to BNG calculations to achieve a minimum 10% to ensure impacts on habitats of biodiversity value are minimised. BNG scoring up until now shows the proposal is currently achieving approximately 7.55% net gain for eligible habitats; once all final designs are concluded and the final on-site BNG score is known, any deficit in percentage from the 10% target, and trading rules, will be made up through off-site habitat creation and/or enhancement (secured via condition).

227. Ecology conclusions:

The term "wholly exceptional" is used only twice throughout the NPPF. The first time is under para 180(c) as previously discussed. The second time is in para 200 where it sets out that the justification for substantial harm to heritage assets of the highest significance (such as grade I, grade II* and scheduled monuments) should be "wholly exceptional".

228. The bar of "wholly exceptional" as a form of protection by the planning system relates to only the rarest of built heritage assets. To give some context to that it is worth acknowledging that grade II listed buildings are not afforded such protection whereas grade I and grade II* Listed Buildings do benefit from such protection. English Heritage state that of the 400,000 listed building entries in the UK only 2.5% of them are grade I and 5.8% of them are grade II*.

229. As such irreplaceable habitats should be viewed in the same context as they have the same level of protection. They are exceptionally rare, intricate ecosystems that have complex interdependencies and have developed over often hundreds of years supporting a large range of species diversity. Harm or loss of them should not be accepted lightly and without a full and robust understanding of all of the issues. In this instance the compensation offered is significant and comprehensive. It involves the delivery of at least 115 hectares of land (284 acres) for biodiversity compensation which would, in time replace the Wood Pasture Parkland and the waxcap grassland. Although it is accepted that it would take decades. The size of the compensation land represents 10 hectares for every 1 hectare lost of irreplaceable habitat and includes the specialist translocation of waxcap grasslands. Taken together this compensation is considered acceptable and sufficient by both the council's ecology advisors and officers of the LPA. Accordingly, it is considered that a suitable compensation strategy has been developed. Para 180(c) and footnote 68 of the NPPF set out that what must

follow is a weighing of the planning balance. The public benefit of the scheme must "clearly outweigh the loss". That is discussed later under the planning balance section of this report.

Landscape and visual impacts

230. The application site is located on the south western boundary of Bury St Edmunds within the grounds of the former Hardwick House, which was demolished in the late 1920s. There is open countryside to the south and west, residential development to the north and the existing hospital site to the urban areas to the northeast and east with further residential areas beyond.
231. The former designed landscape of Hardwick House that the application site sits within has been divided over the last century and now consists in parts of Hardwick Heath, a scout campsite, the existing West Suffolk Hospital, adjacent residential areas, and Hardwick Manor.
232. Within the Site there are both deciduous and evergreen trees and a mixture of native species such as oak and beech, and non-native species including cedars. Tree covered areas within the site include wooded tree-belts, small tree groups and individual parkland style trees. Many of the trees are more than 20m in height with many also assessed as being classified as veteran trees.
233. Locally, the area includes some of the largest areas of grassland habitat in West Suffolk due to the extent of parkland landscape. These estate landscapes also contribute to the high concentration of interlocking deciduous and mixed woodlands, a significant proportion of which are ancient, consisting primarily of oak and ash stands. Where estate planting and mixed replanting has taken place, other species such as sycamore, larch/pine, sweet and horse chestnut and beech are present. The result is a well wooded and enclosed landscape where views are contained by vegetation and coupled with the undulating topography and historic buildings, gives rise to scenic compositions.
234. The pattern of small sinuous lanes which traverse the landscape connect the dispersed settlement pattern and express a strong grain, converging on Bury St Edmunds and reflecting its historic importance and influence on the area. Generally, the extensive woodlands associated with these estates has enabled the settlement growth to be visually integrated into the landscape such that the urban edges of Bury are transitional and soft.
235. Guidance in the NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing "*valued landscapes*" and sites of biodiversity or geological value / soils.
236. In particular, para 130 states that "*Planning policies and decisions should ensure that developments... are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*".

237. Furthermore, para 174 states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*".
238. Policy CS2 of the Core Strategy requires development to conserve or where possible enhance the character and quality of landscape and the wider countryside.
239. Policy DM2 of the JDMPD says that proposals should maintain or recognise local character and should not involve the loss of landscape which makes a significant contribution to the appearance of the settlement.
240. The scheme must also comply with Policy DM13 of the JDMPD – Landscape Features. This states that development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value. The site is located within the Horringer - South of Bury Special Landscape Area (SLA), which is also referenced within Policy DM13. It states:
241. "*These areas, and other valued landscapes such as The Brecks and the Stour Valley (subject of a management and delivery plan through the Dedham Vale AONB and Stour Valley Project) have, by reason of their landform, historic landscape importance and/or condition, a very limited capacity to absorb change without a significant material effect on their character and/or condition. However, individual proposals within or adjacent to these areas will be assessed based on their specific landscape and visual impact.*
242. *All proposals for development should be informed by, and be sympathetic to, the character of the landscape. Landscape Character Types are identified in the Suffolk Landscape Character Assessment."*
243. Other key considerations within this Policy include [but are not limited to]: "*All development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape.*"
244. The application has been supported by a Landscape Visual Impact Assessment (LVIA) (Chapter 10 of the Environmental Statement). Generally, the LVIA has been carried out in accordance with the principles set out on the third edition of the "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3) (Para 4) and LI Technical Guidance Note 06/19 "*Visual Representation of development proposals*" and draws on these for the assessment methodology. The assessment includes a review of the landscape baseline and an assessment of landscape and visual receptors that includes sensitivity, magnitude of change and scale of effect.
245. As acknowledged in the LVIA (Para 10.3.11), the site visits and photography inform the assessment and were undertaken in summer and winter months to show visibility of the site both in terms of worst case

scenario (deciduous trees have no leaf cover) and best case scenario (leaf cover).

Landscape Character

246. The importance of understanding the landscape character of all landscapes in England is recognised in the NPPF, which states that planning policies and decisions should contribute to the natural environment by: "recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services". Landscape character assessment is the process which can identify these intrinsic values and unique characteristics of the diverse landscapes in the UK.
247. Effects on landscape character can be both direct (i.e., on the character area / landscape type that the site is located within), and indirect (i.e., changes to characteristics or perceptions of character that occur beyond the boundary of a character area / landscape type). In addition, effects on landscape character may be positive or negative (i.e., strengthening and enhancing the characteristic patterns and features, or eroding and losing the patterns and features that contribute to landscape character).
248. Natural England has produced a framework of 159 countrywide landscape profiles for England, resulting in the 'National Character Areas' (NCAs). Countryside Character Volume 6: East of England identifies the site as lying within NCA 86 'South Suffolk and North Essex Claylands'. NCA Profiles 86 includes several 'Statements of Environmental Opportunity' (SEOs) and 'Landscape opportunities' relevant to the site.
249. NCA 86 key characteristics of relevance to the site and surrounding area include: wooded skylines formed by hedgerows link woods and copses; the predominantly arable agricultural landscape with a wooded appearance; irregular field patterns, substantial country house estates; dispersed farmstead settlement; and winding narrow lanes bound by deep ditches and strong hedgerows.
250. NCA 86 Statement of Environment Opportunity SEO 2 is of relevance to the site as it seeks to protect parkland trees alongside other types of woodland and trees. SEO 2 mentions the conservation of "historic parklands, with their important veteran trees (for example those at Ickworth), in particular focusing on the continuity of the mature and veteran tree resource in the parklands and in the surrounding landscape."
251. The most localised Landscape Character Assessment (LCA) is the Suffolk LCA (2009). This identifies the site and surrounding landscape as being located within the 'Undulating Estate Farmlands' Landscape Character Type (LCT). The characteristics of this LCT include landscape parks and ornamental tree species, organic field pattern rationalised by estate ownership and ancient woodlands. There is a strong estate character throughout much of this landscape, with fields generally medium to large and organic in form, although there are areas of planned layout apparent throughout the landscape, indicating the systematic enclosure of some land. One of the key forces for change recognised in the supporting guidance note is the 'changes in the management and use of landscape parklands' and recommends these landscapes are restored, maintained, and enhanced.

252. The site is also defined within the Historic Landscape Classification for Suffolk as Post-Medieval Park and Leisure – Informal Park under the following definition: "This is parkland designed to appear semi-natural with clumps of trees within existing grassland and frequently fringed by belts of trees to give privacy and to exclude unwanted views. Usually designed as the setting for a great house and laid out to give vistas from that house."
253. The LVIA has included all associated Landscape Character Assessments and other supporting documents within its baseline study. In terms of the landscape assessment, the following receptors have been included:
- The Site within the Red Line Boundary:
 - Parkland
 - Manor House and Garden
 - Arboretum
 - Hospital grounds; and
 - Temporary construction compound field.
 - Four Assessment Landscape Character Areas:
 - Parklands and historic estates
 - Undulating farmland slopes
 - Plateau farmland; and
 - Urban area
 - The Horringer – south of Bury Special Landscape Area (SLA).
254. The original submission was assessed by the Landscape Officer at Place Services and the impact of the proposed hospital was considered to be underestimated at Viewpoint 1 (Southern part of Sharp Road), 6 (Rights of way network to the south) and 8 View (from Gypsy Lane). Accordingly, the applicant was asked to reduce the height of the proposed new hospital to reduce the impact of the development. Additionally, it was also considered that given the projected height and mass of the proposed building and associated infrastructure associated with its use, a night-time character to be assessed as part of the LVIA was necessary.
255. The maximum development heights parameter plan which sought to set the maximum height of the building in certain locations was amended by the applicant and as such some areas were reduced. The original submission sought three maximum development heights (including mechanical plant) of 25m, 35m and 35.5m. Owing to the undulating natures of the site figures Above Ordnance Datum were also given. The amended maximum development heights remained the same on the eastern side (where the ward blocks are predicted to go) but reduced the majority of the western side of the building by 10 metres.
256. Additionally, the amended details differentiated between maximum development height (which would include things like mechanical plant) and the maximum accommodation height. The maximum accommodation height parameter was introduced as a form of mitigation through controlling the maximum height of occupied floors which would have floors with lit windows to understand the subsequent potential night time effects of the building. These maximum accommodation heights are shown on the parameter plan as being 5 metres below the maximum development height of the building.

257. The application is now supported by a night time assessment. The Landscape officer agrees with the conclusions of the assessment. Of most relevance, the LVIA addendum assesses the change in view from Gypsy Lane to be "*prominent but not dominant, but nevertheless noticeable in the absence of other sources of light within the same direction of view.*" Its therefore considered that mitigation measures will need to be in place to reduce levels of light. Such mitigation measures that could be used singularly or in combination are:

- automated internal blinds;
- glazing treatments;
- external static shading elements;
- automated dynamic mitigation; and
- facade design and artificial lighting internal locations

258. The scheme seeks to set two areas of structural landscape which are located on the northern and southern boundaries of the Hardwick Manor parkland area. They have been put forward to help mitigate the impact of the development from a visual perspective. As discussed in the Residential Amenity section of the report the southern part of Sharp Road is particularly open to the site. Officers considered that additional information to that which was originally submitted was necessary to understand precisely what areas within the northern structural landscape area could definitely accommodate meaningful landscaping to help mitigate the development. As piped features of the necessary surface drainage network must travel through the northern structural landscape area it was vital to understand what areas could and could not accommodate meaningful landscaping.

259. Amended details now show that the structural landscape area on the northern boundary will be made up of two large irregular sized blocks that seek to create a multi layered approach to softening and mitigating the impact of the development.

260. Objection has been received seeking to understand why the maximum permissible height of the building can't be reduced, perhaps by enlarging the footprint of the building to reduce the impact of the building on the wider landscape. This is at face value not an unreasonable question and warrants an explanation. Firstly, the WSFT have set out that with a new hospital, zonal adjacencies through vertical stacking maintain good patient and staff flows. Essentially this means a taller building will allow for a more efficient hospital. By reducing the height of the building and increasing its footprint this would have ongoing negative clinical and financial implications throughout the life of the proposed hospital.

261. Such a change would not be without other material planning implications. Whilst a Special Landscape Area is a valued landscape it is a local designation when compared to the protection other landscapes may benefit from such as Greenbelt, Areas of Outstanding Natural Beauty or National Parks. Increasing the footprint of the building would mean that more irreplaceable habitat was harmed and as explained already that type of ecology has a very high level of protection in the planning system. Para 174 (a) of the NPPF says that planning decisions should contribute to and enhance the natural and local environment by *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a*

manner commensurate with their statutory status or identified quality in the development plan) The NPPF therefore doesn't allow an arbitrary selection of what should receive more protection. The NPPF requires a logical approach after considering statutory status or a comparison of their quality or value. In this instance it is clear that whilst the Special Landscape Area is important it is not as important as irreplaceable habitat.

262. Overall officers are satisfied that the applicant has struck an acceptable balance for the proposal against several very significant constraints. For example, reducing the loss of irreplaceable habitat and still ensuring that the impact on the wider landscape is adequately minimised. Other conflicts including accommodating the necessary drainage features to ensure neither the development nor other properties downstream were put at an increase risk of flooding but at the same time ensuring that sufficient space was left for necessary landscape mitigation.
263. There remain some differing opinions on the development's landscape and visual impact between the council's landscape advisor and the findings presented within the submission. These can be summarised as
- Residual effects on the Landscape Character of the Parklands and Historic Estates. The landscape officer considered that they have been underestimated and the residual effects would be moderate adverse (significant).
 - Residual effects on Representative Viewpoint no.1 (Sharp Road) - Though we accept that mitigation 'buffer' planting is to be proposed between the viewpoint and the proposed built form, this will still have a higher magnitude of change than the judgement of 'low' given. Therefore we would judge that the magnitude of change at year 15 is 'medium' and in turn the level of effect and significance would be moderate adverse (significant).
264. Generally, it is agreed that there will be a level of adverse harm both to landscape character and visual amenity. In terms of significance the harm will mostly be localised which will need weighing up in the overall balance.
265. Policy BV26 of the Bury St Edmunds Vision document (Green Infrastructure in Bury St Edmunds) seeks to protect and enhance green infrastructure and create new habitats identified in the Green Infrastructure Strategy (GIS). Green Infrastructure projects seek to enhance the character of Green Infrastructure Action Zones as identified in the GIS. In this instance the site is located in Action Zone F: "*Historic Parkland and Woodland*". Green Infrastructure project F.2 (which is shown as Project E.2 on page 73 of the Bury Vision document in error) seeks to enhance the wooded character south of Bury St Edmunds and deliver biodiversity gains. It is clear that the delivery of the project will overall be contrary to project F2 and overall aims of the Policy (enhancement of green infrastructure).
266. The scheme is considered contrary to policy DM2 of the JDMPD and para 130 and 174 of the NPPF as the proposal fails to maintain or recognise local character and would involve the loss of landscape which makes a significant contribution to the appearance of the settlement. The proposal is also contrary to policy CS2 of the Core Strategy which requires development to conserve the character and quality of landscape and the wider countryside. Policy BV26 seeks to extend the coverage and connectivity of the strategic green infrastructure network whilst enhance the landscape character of

Action Zone F (Historic Parkland and Woodland). The project would fail to do this as the overall project would detract from the Parkland setting. The scheme is also contrary to planning policy DM13 of the JDMPD which says that "*Where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations.*" The LPA are therefore required to do a weighing up exercise of the harm against the benefits. That process is carried out under the planning balance section of the report.

Impact on trees

267. Local Plan policy DM13 of the JDMPD sets out that development should seek to avoid unacceptable adverse impact on the character of the landscape and landscape features. Para 130 of the NPPF sets out that decisions should ensure that development is visually attractive as a result of amongst other things effective landscape. Para 131 sets out that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.
268. The Arboricultural officer objected to the original scheme as the impacts on a small number of veteran and candidate veteran trees appeared to be unnecessary and there appeared to be fundamental conflicts between existing trees and proposed utilities/ drainage, which again appeared unnecessary.
269. On Hardwick Lane, amended plans removed the proposed roundabout and the scheme now proposes a light controlled junction. The previous proposal would have resulted in the extensive loss of visually important trees. The current proposal will still require removal of category B trees, however, these losses are not so significant and do not have such historic importance in relation to the context of the site. Comments were received from members of the public in relation the importance of retaining the significant trees along the Hardwick Lane frontage and concern was raised as to whether the trees that were shown as being retained would actually be retained. This resulted in the applicant submitting additional details that sought to demonstrate tree retention. Drawings 221110-1.1-TPP-Lane Extract-NC and 65206871-SWE-XX-XX-X-TP-0016-P04-Walking & Cycling Route Cross-Sections (South Hardwick Ln) were provided to demonstrate that the layout was achievable without significant level changes and therefore impact to retained trees. Specialist working methods will be employed where root protection areas (RPAs) will be affected that will be suitable to mitigate the risk of root loss/ground compaction. Where there are incursions into RPAs for excavation, these are minimal and are unlikely to have any long term effects on tree health.
270. The proposed footpath and cycleway that runs east-west on the southern side of Hardwick Lane will result in some minor tree losses, however, the majority will be able to be retained if cellular confinement and permeable surfacing is used in the vicinity of the retained trees. The extract from the Tree Protection Plan has shown that this system will be employed to

minimise ground compaction. Tree group G737 will be lost to accommodate the route, however, the dense planting and location between existing buildings mean that the group is not as high quality as those proposed for removal in the initial access proposal and will not be such a significant loss. Officers are therefore satisfied that the trees shown as being retained will be retained on the Hardwick Lane frontage.

271. The scheme now demonstrates that two alternative routes to the Hardwick Manor dwelling (proposed to be changed to health uses) can be delivered. This will enable access to the Manor House that avoids the buffer zones of veteran trees. Whilst either of these routes would result in a higher number of trees being lost, none of the trees would be veteran and this would reduce the future pressure for removal of veteran trees along the existing access which are in themselves considered irreplaceable habitats.
272. The Drainage Strategy has been updated since the original submission, which has improved the retention of important trees. The proximity of the attenuation areas in relation to veteran trees has been increased so that there are now no conflicts. The proposed swale is outside of all root protection areas and given that flows will be limited to those areas, there is not anticipated to be any additional pressures on retained trees.
273. In addition, a Hydrological Impact Assessment has been provided that shows that there will be little to no change to the hydrology in the buffer zones of the veteran trees. This assurance satisfies the concerns that were initially raised regarding the alterations to the water flows and the impact this would have on mature trees.
274. An updated Utilities Parameter Plan has been provided that shows relocation of the fire hydrant ring main, borehole circuit and primary and alternative service corridors. These are all now outside of the RPAs of the most important trees on site and do not have the conflicts that the previous locations did. As the Reserved Matters applications are developed the Arboricultural Impact Assessment and Arboricultural Method Statement should also be updated so that significant impacts can be minimised as expected.
275. Subject to a range of conditions focusing on updating the Arboricultural Impact Assessments at Reserved matter stage and tree protection measures as recommended the scheme is considered acceptable in tree impacts terms. The scheme is considered compliant with policy DM13 and the relevant paragraphs of the NPPF.

Protection of water quality and resources and flood risk management (including surface water drainage)

276. Policy DM14 requires that all development demonstrates that it does not have an unacceptable impact on surface and groundwater quality. The proposed development site is located upon principal and secondary aquifers, within groundwater source protection zone SPZ2, and in the vicinity of surface watercourses including drains and the Rivers Linnet and Lark. The controlled waters sensitivity is high as contaminants from the site may enter the aquifers and pollute the protected water supply or the surface watercourses. The site includes an active hospital (the West Suffolk Hospital area) and an area of park and woodland (the Hardwick Manor area), both of

which may present potential pollutant linkages to controlled waters. The Environment Agency has raised no objection to the originally submitted scheme. Their comments following the second round of consultation confirmed their position had not changed. Furthermore, they took the opportunity to remind the applicant that deep infiltration systems are not routinely acceptable and are only approved if it is demonstrated that they satisfy all of the requirements within the Groundwater Protection Position Statement.

277. Policy DM6 sets out that proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere. Systems that can be employed include rainwater harvesting and greywater recycling, and run-off and water management such as Sustainable Urban Drainage Systems (SUDS) or other natural drainage systems.
278. The site is shown on the EA Flood Map for Planning to lie in Flood Zone 1 (less than 0.1% annual probability of fluvial or tidal flooding) and is not at significant risk of flooding from tidal or fluvial sources.
279. The EA Flood Risk from Surface Water Map shows that the majority of the Site is at very low risk of surface water flooding. However, there are areas of low to high risk of surface water flooding associated with two established surface water flow paths across the site as well in addition to some more isolated areas associated with low spots on the topography:
 - An area of low to high surface water flood risk extends from the south-west to the north-east corners of the site that appears to originate from Horsecroft Road and appears to follow the route of the original drain prior to it being culverted.
 - An area of low surface water flood risk extends from the centre of the site's southern boundary and flows in a northerly direction towards the surface water drain in Sharp Road. The surface water appears to originate from agricultural land to the south of the site.
 - Several isolated areas of low to high surface water flood risk are identified on the grounds of the existing West Suffolk Hospital indicative of pooling of flood waters in topographic depressions and increased surface run-off due to the impermeable area.
280. The Planning Practice Guidance on flood risk and coastal change sets out that development should be located in areas of little or no risk of flooding from any source including surface water flooding. The guidance sets out that avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied.
281. As discussed above at paragraphs 145-151 the applicant looked at other alternative sites that are at lower risk of flooding (redevelopment of the current hospital site, the allocated site at Westley and the Rougham Airfield) and did not pursue those sites because whilst they are more preferable from a solely flood risk perspective, they were not considered deliverable by the

applicant within their time constraints. Accordingly, officers are satisfied that the sequential test has been passed.

282. The Guidance sets out that if the sequential test shows that it isn't possible to use an alternative site, that a second exception test is required that demonstrates that the development has wider sustainability benefits which outweigh flood risk, that the development will be safe for its lifetime and will not increase flood risk elsewhere.
283. The Lead Local Flood Authority (LLFA) at Suffolk County Council has been engaging with the applicant's technical drainage engineers since the application was first submitted to the LPA. The LLFA officer objected to the original submission and required a range of additional information and some amendments to the scheme. Of particular note was that the three retention basins located to the north of the proposed hospital were amalgamated into one large basin. This retention basin is part of the diversion of the existing surface water flow path on site and is required to hold back water on the site before allowing it to flow downstream at a managed rate. The amended details submitted have enabled the LLFA to withdraw their previous holding objection and accordingly they are of the opinion that the exception test has been met, in that the sustainability benefits of the development outweigh the flood risk.
284. However, it should be highlighted that the LLFA response is caveated. The officer sets out that some concerns do remain regarding the dimensions and positioning of the proposed SuDS features in relation to local and national guidance and policy. The proposed SuDS do not yet fully address the 4 pillars of SuDS with further work needed to ensure the features deliver amenity, biodiversity and effectively manage water quality alongside managing the volume/rate of surface water runoff. Additional infiltration testing also needs to be undertaken. The scheme is heavily reliant on 'deep' infiltration which is only acceptable to the EA in exceptional circumstances due to the increased risk to groundwater and sensitive chalk aquifers locally and will need to be further assessed. Whilst the proposal does not yet fully meet current standards for sustainable and multifunctional SuDS in accordance with national and local guidance and policy, SCC LLFA acknowledge that this can be resolved at the more detailed design stage and through appropriate conditions.
285. Officers are satisfied that the Sequential Test and the Exceptional Test have been met. Officers are also satisfied that Policies DM6 and DM14 of the JDMPD have been complied with. Whilst it would have been ideal that further information to have been submitted regarding the acceptability of a deep infiltration system, officers are satisfied that such systems can be demonstrated to be technically acceptable as they have been elsewhere like on the Suffolk Business Park Extension.

Heritage Impacts

286. Heritage assets encompass a wide range of features, both visible and buried, including archaeological remains, Listed Buildings and non-designated heritage assets.
287. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states in considering whether to grant planning permission for

development which affects a listed building or its setting, the Local Planning Authority (LPA)... ...shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

288. Policy DM15 of the JDMPD says that development affecting the setting of listed buildings, will be permitted where they:

- a. demonstrate a clear understanding of the significance of the building and/or its setting, alongside an assessment of the potential impact of the proposal on that significance;
- b. contribute to the preservation of the building;
- c. are not detrimental to the building's character or any architectural, archaeological, artistic or historic features that contribute towards its special interest;
- d. are of an appropriate scale, form, height, massing, and design which respects the existing building and its setting;
- e. use appropriate materials and methods of construction which respect the character of the building;
- f. have regard to the historic internal layout and other internal features of importance;
- g. respect the setting of the listed building, including inward and outward views; h. respect the character or appearance of a park, garden or yard of historic or design interest, particularly where the grounds have been laid out to complement the design or function of the building. A curtilage and/or setting which is appropriate to the listed building, and which maintains its relationship with its surroundings should be retained; and
- i. have regard to the present and future economic viability or function of the listed building.....

.....All development proposals should provide a clear justification for the works, especially if these works would harm the listed building or its setting, so that the harm can be weighed against any public benefits.

289. Chapter 16 of the NPPF deals with conserving and enhancing the historic environment. Para 189 sets out that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Para 202 says that

290. "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...."

291. Para 206 sets out that "local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

Built heritage

292. The application is supported by a Heritage Impact Assessment and that assessment concludes that "While the development of a new District

General Hospital to the southwest of Hardwick Manor would be likely have a deleterious effect on its setting by comparison with the present open parkland landscape; it is contended that the public benefits of a new District General Hospital as set out in Section 16 of the National Planning Policy framework and the National Planning Practice Guidance would considerably outweigh the less than substantial harm to the listed building.” Para 20 of the Planning Practice Guidance (Historic Environment) sets out that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit.

293. Both the councils Conservation Officer and the Suffolk Preservation Society share the view that the negative impact would be less than substantial with a high degree of harm. As set out above para 202 of the NPPF says that *where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*
294. It is highlighted that the design principles demonstrate how the buildings mass is envisaged to be broken into smaller units to reduce the overall impact of the new hospital. Additionally, it is acknowledged that whilst materials are not before the council within this application the application sets out that careful selection of materials to further assimilate the building into its surroundings will mitigate the impact of the buildings. Furthermore, the proposed multi-storey car park has been relocated from its original proposed position at the pre application stage further away from the listed building. The Suffolk Preservation Society seek further mitigation in the form of the building siting, materials and further landscaping. Whilst materials, colours, design and bulk can be considered at reserved matters stage, officers are aware that realistically there is very limited opportunity for significant tree planting or even the planting of what will become significant trees between the new hospital building and the veteran trees to the west of the listed walled garden.
295. Regardless of mitigation measures it is acknowledged that they still do not compensate for the fact that the parkland setting of Hardwick Manor would be dramatically changed by the proposed hospital, which would be of a considerable scale and in close proximity to the listed building and walled garden. In addition to the built form, issues such as the introduction of lighting and increased noise levels would also change the character and ambience of the site, further detracting from its setting. The wider parkland setting of the building contributes to its significance, forming part of the historic grounds of Hardwick House and providing a peaceful, natural setting for Hardwick Manor and this will be negatively impacted upon.
296. The Suffolk Preservation Society set out that they welcome that this heritage asset will be brought to a sustainable use and consider that the Manor and its gardens could make a positive contribution to the overall hospital site. Whilst the building is vacant and has been since the WSFT bought it, the building is in very sound condition and is being properly maintained. Whilst positive weight is given to a use that will ensure the building is used and maintained, this is limited as there is no reason to believe that it wouldn't be well maintained if the current use lawful use (residential) was reinstated.

297. The Planning (Listed Buildings and Conservation Areas) Act 1990, local planning policies and the NPPF seek to protect Listed buildings and their setting. The legislation places a requirement on decision makers to have special regard to the protection of listed building and their setting. A precautionary approach should be adopted and if development is approved that causes less than substantial harm there should be clear justification especially if these works would harm the listed building or its setting, so that the harm can be weighed against any public benefits. The LPA are required to do a weighing up exercise of the harm against the benefits. That process is carried out later on in this report under the planning balance section of the report.

Buried heritage (Archaeology)

298. The application when originally submitted generated an objection from the Suffolk County Council Archaeological Service as pre determination trial trenching had not been undertaken. This was a deliberate on the applicant's part taking into account their duties under the Environmental Damage (Prevention and Remediation) (England) Regulations 2015. They were acutely aware that by undertaking the archaeological trial trenching they would have destroyed large amounts of grassland; emerging evidence was indicating that it was ancient grassland that would be classified as irreplaceable habitat.
299. However, work between the ecologists involved and further understanding of the project and its possible flexibility at reserved matters stage allowed for trial trenching to take place in the limited areas where drainage retention features would have to go and under the supervision of on-site ecologists.
300. It has been agreed that all other archaeological trial trench investigation would take place only once the waxcap grassland turfs have been translocated off site but before the Reserved Matter application details have been worked up. Accordingly, the SCC Archaeological Service has confirmed that there are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the NPPF para 205, any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Impact on Residential Amenity (construction and operational phase)

301. Policy DM2 sets out that proposals for all development should not adversely affect residential amenity. Loss of residential amenity can occur during the construction or operation phase of a development and can be caused in a number of ways including;
- Noise,
 - Smell,
 - Vibration,
 - Loss of Light,
 - Overlooking/ loss of privacy,
 - Overshadowing,
 - Other pollution (including Light pollution),
 - Vehicular activity generated,

- Visual intrusion or
- overbearing

Construction phase

302. Officers have considered the impact of the construction phase on nearby residential properties. The impact of this will need to be controlled by standard conditions, such as controlling hours of construction. Officers accept there may be some loss of amenity to Lodge Cottage whose relationship to the construction compound is exposed across open fields with the separation distance being approximately 110 metres. Loss of amenity from dust can be a common problem but can be managed by selecting locations away from residential properties and minimising the length of time soil is stored. Controlling the layout of the compound by condition to ensure obvious issues are avoided where possible is considered necessary.
303. 25 Sharp Road has a particularly open and exposed relationship with the development site at present. The change during the construction period to their outlook and levels of noise they experience has the potential at times to be significant as the property currently has a tranquil setting. Officers consider that there will be some loss of amenity but again this should on the whole be managed to acceptable levels by the various standard construction conditions.
304. Other notable properties who have a close relationship to the site are those at Hardwick Farm to the south of the proposed hospital. They have a much less connected relationship with the site and existing landscaping and buildings separate the site from them. Officers are content that whilst they may experience a change in noise levels at certain times their amenity should not be unduly harmed for the temporary construction period.

Operational phase

305. The development is supported by a Residential Visual Amenity Assessment which assesses impact on surrounding residential properties. The assessment looks at 6 properties with 25 Sharp Road and the properties at Hardwick Farm properties being the most likely to be harmed.
306. The application acknowledges that an acoustic fence may be necessary in order to mitigate loss of amenity to 25 Sharp Road. If it is needed this will likely be placed next to the northern boundary of the main access road that would lead to the hospital. The submitted details set out that such mitigation would be sufficient, and no other such mitigation is identified as necessary elsewhere to mitigate noise.
307. Whilst details submitted seek to restrict the access to various parts of the wider site to protect ecology, officers were also keen to inhibit the general public from being able to access the land immediately next to the boundary of 25 Sharp Road which has very open visually exposed boundaries to its rear garden. The details show that such access for the general public would be restricted broadly to the immediate north of the retention basin. However, if the acoustic fencing was delivered next to the footpath adjacent to the main access road then the general public would be held back even

further. This arrangement is considered helpful in reducing the magnitude of change that the occupiers of 25 Sharp Road would experience.

308. Loss of light is a material consideration. The proposed hospital would be broadly to the south of the properties Sharp Road. The closest part of the proposed hospital would have a maximum height of 25 metres and would be set away by at least 159 metres from the closest part (the building not curtilage) of 25 Sharp Road. Officers are satisfied that even with a building of such height no material loss of light would occur to 25 Sharp Road.
309. Concern has been raised from the occupiers of 25 Sharp Road from loss of light and a sense of overbearing that would be caused by the suggested structural landscaping proposed in the entrance to Hardwick Manor from Sharp Road, which is immediately to the west of their dwelling. Of particular concern is the impact on the sitting room which is closest to this proposed planting. Officers have been in this room which benefits from having windows on three elevations (Northwest, South West and South East). The largest source of light to the room is the opening which faces south east and that is made up of full height panes of glass either side of French doors. The window which faces south west already has a backdrop of existing well established tall landscaping which includes evergreen species. This is approximately 20 metres away from the residential building/sitting room. Officers note that the plot, and consequently the room are set on slightly lower ground to the access road and so the proposed landscaping would be set on slightly higher ground. The proposed structural landscaping is intended to act as mitigating buffer planting between Viewpoint 1 (The southern end of Sharp Road) and the proposed development and between 25 Sharp Road and the roads, vehicles and buildings that would be present on the site if approved. Whilst the area of landscaping would be set at outline stage, the details (size, species and spacing) of the landscaping are not yet fixed and would be approved at a later date. Officers are satisfied that whilst the landscaping immediately to the west would be closer to the dwelling than the existing landscaping, sufficient space would remain so that this would not feel oppressive or dominating to the amenity of the dwelling and in particular the sitting room. Any loss of light that might be caused is not considered to be significant.
310. It is widely accepted that there is no private "right to a view" and appeal decisions regularly confirm this position. However, the development must not be visually intrusive, dominant, overbearing, oppressive or cause a loss of amenity through light pollution. One of the primary purposes of the northern block of structural landscaping is to mitigate the development's visual impact on the occupiers of 25 Sharp Road and particularly when they are in their private garden area. The northern structural landscaping has been worked up alongside the drainage scheme to ensure that it can definitely be delivered and there will be no conflicts with drainage features. Officers are of the view that the proposed landscaping that will be brought forward alongside the existing retained landscaping on the northern boundary, will form a substantial amount of multi-layered landscaping that will soften and mitigate the visual impact of the development on the occupiers of 25 Sharp Road. Other mitigation, particularly to limit light pollution can be secured at the Reserved Matters stage when the final location, height, and façade/ fenestration detail will be known. Whilst officers accept there will be a change in outlook which will likely be significant this will not be harmful in residential amenity terms. Accordingly,

officers are satisfied that there will be not significant loss of amenity to the occupiers of 25 Sharp Road

311. Hardwick Game Farm bungalow and house benefit from existing landscaping between the properties and the southern part of the proposed Hospital site. Additionally, the Hardwick Farmhouse benefits from other farm buildings being between it and the development. The bungalow would be at 94m away from edge of the development site. Further regard will need to be given to this relationship at the reserved matter stage in order for their residential amenity to be adequately protected.
312. Air Quality has been considered and a loss of amenity could be caused from the flue serving the back up generator. The final details of the position and height of the flue will not be established until the reserved matters stage and therefore an assessment of the impacts cannot currently be undertaken until these details have been finalised. A condition to ensure this assessment is completed and the impact is controlled at the reserved matters stage is acceptable.
313. Objections have been received from the occupiers of 104 Hardwick Lane and the impact they will experience from the light controlled junction. Officers do not agree that this will cause significant loss of residential amenity. It is acknowledged that there will be a change in junction details, but such arrangements in an urban setting are not uncommon. The property benefits from being set back from the adopted highway by over 17 metres and there are gates and other boundary vegetation which will further protect residential amenity.
314. There may be some temporary adverse impacts to properties during the construction phase, but these can be limited through the imposition of conditions. Officers accept and acknowledge there will be change but no significant loss of amenity has been identified in the operational phase of the development. Accordingly, the scheme is found to accord with policy DM2 of the JDMPD.

Land Contamination

315. Policy CS2 of the Core Strategy requires the remedying of existing pollution or contamination and preventing further pollution arising from development proposals. Policy DM14 of the JDMPD states that development will not be permitted where there are likely to be unacceptable impacts arising from the development on land contamination grounds.
316. In this instance the Land Contamination Officer is satisfied that the investigations on the wider Hardwick Manor site conclude that no remediation is necessary.
317. Although the report does not identify any potential contaminants at levels that are harmful to human health on the current hospital site, a number of sources of contamination are not investigated, and the potential of elevated contaminants remains at the site and further investigation is warranted. The submitted details acknowledge this and it is concluded that further work should be undertaken.

318. The Land Contamination Officer acknowledges that further investigations may be difficult while the current hospital is operational and as such suitable investigations will need to be carried out following the decommissioning of the existing hospital.
319. Officers are therefore satisfied that the scheme is acceptable in land contamination terms and meets the requirements of policy DM14 and CS2 with the imposition of standard conditions relating to necessary further investigation and possible remediation.

Air Quality

320. Policy CS2 of the Core Strategy requires the conserving and, wherever possible, enhancing of natural resources including, air quality. Policy DM14 of the JDMPD states that proposals for all new developments should minimise all emissions and ensure no deterioration to either air or water quality.
321. Paragraph 107 of the NPPF states that 'local parking standards for residential and non-residential development, policies should take into account e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.' Paragraph 112 of the NPPF states that 'applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.' Air Quality Planning Policy Guidance lists mitigation measures for reducing the impact of air quality and includes the provision of "infrastructure to promote modes of transport with a low impact on air quality (such as electric vehicle charging points)."
322. In this instance the Air Quality officer has raised no objection to the amended scheme before the LPA. The officer clarifies that the light-controlled junction proposed on Hardwick Lane would be acceptable and that no site-specific mitigation would be required.
323. The proposal does not include an assessment of the impact from construction traffic. However, given that this cannot be undertaken until such time as the construction programme is developed this can be conditioned. Furthermore, the officer is satisfied that an assessment of the impact of the exhaust flue for the backup generators should be conditioned to be submitted at the reserved matters stage when the details of the flue and its location is known.
324. Section 9.56 of the submitted planning statement confirms that "15% of total parking provision will have active electric vehicle charging points as well as a further 15% with the ducting to allow for easy retrofitting in the future This proposed provision accords with the Suffolk Parking Standards and is considered acceptable and should be conditioned.
325. Officers are therefore satisfied that the scheme is acceptable in Air Quality terms and meets the requirements of policy DM14 and CS2.

Energy and Sustainability Energy Carbon net zero/ BREEAM

326. The proposed new hospital is submitted in outline as the detailed design is not yet developed. However, the application sets out that key principles

relating to energy and sustainability are being considered from the outset. The Design and Access Statement sets out that as part of the New Hospital programme, there is a requirement for the proposed new hospital to target the Net Zero Carbon Building Standard. The proposed new hospital is also exploring the possibility of using modern methods of construction (MMC) which can help deliver efficiencies in reducing construction time and reductions in embedded carbon.

327. Policy CS2 seeks development to incorporate principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice. It continues by setting out that where feasible and viable development should be carbon neutral. Policy DM7 of the JDMD follows on from this requiring all proposals for new development to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques. This policy also says that all new non-residential developments over 1000 square metres are required to achieve the BREEAM Excellent standard or equivalent unless it can be demonstrated that one or more criteria are met relating to a on-site constraint or viability.
328. In this instance the Environment Management officer has confirmed that with the imposition of conditions requiring a BREEAM pre assessment and the final scheme being certified as BREEAM Excellent then the scheme is acceptable. The officer highlights that the net zero target relies on the decarbonisation of the electricity grid but highlights that the new hospital would not be reliant on fossil fuels except for the back up generator.
329. Officers are therefore satisfied, subject to appropriate conditions, that the scheme is acceptable in sustainable design, construction and energy terms and meets the requirements of policy DM7 and CS2.

Public Benefits

330. Chapter 2 of the NPPF is entitled "Achieving sustainable development". Para 8 within that chapter is concerned with achieving sustainable development. It states
331. *Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
 - a) 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;
 - b) 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

c) 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.

332. To ensure that the application is assessed properly, all three elements of sustainable development need consideration so that the public benefits can be weighed against identified harm.

Economic Benefits

333. WSFT is one of the largest employers in Bury St Edmunds. The WSFT Annual report 2021-22 [Annual Report 2021-22 \(wsh.nhs.uk\)](https://www.wsh.nhs.uk/annual-report-2021-22) sets out that the staff salaries and wages were £179 million with total staff costs at £232 million for the 2021/2022 year. This unquestionably has a significant positive impact on the economy of Bury St Edmunds and beyond. Whilst no figures are given officers also accept that a large employer has Direct Impacts, Indirect Impacts and Induced Impacts on the wider economy of the area. The construction and demolition stage alone is estimated to cost at least £648 million, will last 3-5 years and employ hundreds of people and the economic benefit will be far reaching.

Social Benefits

334. Chapter 14 of the ES is a Socio Economic Assessment of the proposal. The summary of effects highlights that Significant beneficial effects during the operational phase of the project are anticipated. The residual significance on the Local community from having a 21st Century hospital is classed as "Very Significant beneficial" effect. The provision of new digital technology in the hospital is anticipated as having a Moderate beneficial effect. Officers have no reason to disagree with these conclusions.
335. The applicant highlights in their submission that West Suffolk has a higher proportion of people aged 65 and over and a lower proportion of working age people compared to average levels in the UK. Growth in older age groups is anticipated to continue, which would expect to place further demand on already stretched health and care services and a requirement for increased hospital beds unless significant changes are made to the model of care. The implications of not having a hospital stretch much wider than the immediate vicinity. It is well reported that the health and care system is under immense pressure. If the West Suffolk Hospital was not in existence, the appointments, visitors and procedures currently carried out would not disappear, they would need to be absorbed by other local, already stretched services. Officers acknowledge that this would likely lead to even longer waiting times, increased distance for patients to travel, additional stress for existing staff, and ultimately potentially negative or even fatal implications for patients.
336. The applicant highlights evidence, underpinned by research, that shows that patient recovery rates and outcomes are often improved by views of and access to natural scenes, views, and noises. These helps reduce stress levels amongst other positive side effects. The garden hospital as a concept seeks to connect the internal hospital environment with the natural world around it. Views out help with orientation and wayfinding as well as a sense

of connection with the wider world. The internal environment ceases to be an inward focused island dominated by technology. This is hard to fully quantify and thus apportion weight accordingly. Full details of the research referred to have not been submitted but officers accept the premise. Much like forest bathing or wild swimming are recorded as having physical and mental benefits it is not considered unreasonable to believe that engaging with the natural environment would have a positive impact on patients. This is therefore given positive weight in the overall balance.

337. How officers assess benefits of a scheme is not defined and is a matter of reasonable judgement. The development would have clear economic and social benefits which accord with para 8 of the NPPF. The development would provide infrastructure and allow for access to health services which would support the community's health. In this instance officers consider that the scheme would have substantial and far reaching positive economic and social benefits during the construction phase but also across the operational lifetime of the new hospital.

Environmental Benefits.

338. The application will cause harm to landscape, built heritage and ecology. As discussed above in paragraph 226 the application is seeking to deliver BNG when the irreplaceable habitat is excluded. However, because the development involves the loss of irreplaceable habitats no enhancement can be claimed. The scheme would deliver a number of offsite sustainable transport route enhancements as discussed in paragraphs 173-179 above. These are necessary in policy terms and in keeping with the scale of the proposed development. Overall given the harm identified it is considered that the environmental benefits are limited.

Planning Obligations

339. Planning obligations are required to meet a number of tests in order to meet the requirements of The Community Infrastructure Regulations 2010 (as amended). The tests are that planning obligations should:

- be necessary to make the development acceptable in planning terms.
- be directly related to the development, and
- be fairly and reasonably related in scale and kind to the development.

340. Core Strategy policy CS2 seeks to secure high quality, sustainable development by (inter alia) providing the infrastructure and services necessary to serve the development. Further details of the requirements for infrastructure delivery are set out in Policy CS14.

341. The following Heads of Terms are triggered by the development proposals (by policy requirement, consultee requests or identified development impacts)

1. A sum of £668,964.80 so that a sustainable route between Horringer and the new hospital can be delivered by the SCC Highway Authority/ Rights of Way team (inclusive of dropped kerb and tactile paving)
2. A bond of £350,000 so that mitigation can be delivered if necessary, on J42 of the A14 after the development has been brought into use.
3. A sum of £50,000 to cover the costs of the making and implementation of

- Traffic Regulation Orders (TRO) in the Bury St Edmunds and including parking restrictions on Gypsy Lane and Horsecroft Road
4. A sum of £20,000 to cover the costs of the making and implementation of Traffic Regulation Orders (TRO) on Mayfield Road
 5. A sum of £5000 (or £1,000 per annum for five years) For SCC to fully engage with the Travel Plan.

Other matters

Helipad

342. A number of objections have been raised concerning the removal of the helipad from the originally submitted scheme. The Trust has explained that they withdrew the Helipad from the current new hospital application as this would be subject to a separate business case to that of the proposed hospital. That separate business case will analyse risk, benefit and cost to ascertain the best location for the helipad. Objections have been received which set out that there is no Civil Aviation Authority compliant helipad in the proposed new hospital. Instead, there is a reliance on the existing pad which will be non-compliant when serving the new hospital due to its distance from the new A&E and present a risk to the safety of sick and injured patients being transported from the helicopter to the hospital.
343. There are no local or national planning policies which require a new hospital to have a helipad or set out a requisite distance between a helipad and a hospital. The question of whether the existing helipad would meet the needs of the new hospital is a matter for the Trust management and not a material consideration relating to the processing of the application before the Council. That said, WSFT has confirmed that they may revisit the situation and seek permission for a new location which would be assessed on its own merits at that time.

Retail impact

344. The proposal includes 524m² of front of house restaurant with a back of house kitchen which would have a floor area of 1276m². Policy DM35 of the JDMPD sets out that proposals for retail floorspace (which restaurants are classified as) in excess of 1000m² outside of town centres will need to demonstrate that they will not have a significant adverse impact on town centres. In this instance whilst the kitchen and restaurant floor area cumulatively are more than 1000m² these would serve staff, patients and visitors and are considered necessary and ancillary to the overall use. There are currently no plans to create additional retail or food or beverage provision within the scheme.

Nursery childcare

345. The SCC Developments Contributions Manager raised queries about the amount of on-site workplace nursery provision. The updated Planning Statement accompanying the application issued in August 2022 sets out that the Busy Bees nursery is intended to be retained. It is agreed that nursery provision is important for staff recruitment and retention and SCC welcomes the clarification provided by the applicant and the commitment to continue with on-site nursery provision for staff working at the hospital. The SCC officer has asked the LPA to consider the retention of the nursery

provision by condition but this is not considered necessary or appropriate as officers can't identify any policy grounds to do so.

Pre application consultation.

346. Objection has been received setting out that the pre application engagement undertaken by the Trust was premature and the process did not disclose any of the disadvantages of the application site. Para 39 – 46 of the NPPF covers Pre-application engagement and front-loading of the application process. The “Pre App” process is there for the benefit of the LPA, an applicant, statutory consultees and the wider community. It is not a compulsory process under the planning system but is very much encouraged for a whole raft of reasons, not least for identifying potential issues that might arise during a planning application so that the application might be submitted in an acceptable form. Officers do not share the opinion that the applicants pre application was flawed. Whilst it is encouraged, there is no obligation through planning regulations for pre-application engagement to take place.
347. The applicant engaged with both the LPA and statutory consultees multiple times, often with different consultees at the same time throughout 2021 and in 2022 before the application was submitted. The submitted Statement of Community Involvement sets out that the WSFT carried out two main period of consultation with the general community and other stakeholders. These both involved various drop in events in a number of towns that are served by the present West Suffolk hospital. The first period of consultation was to primarily identify if other sites around the town had been missed as a potential for a new hospital. The second period was to share with the wider community their initial thinking on their layout to help engender comments, thoughts and feedback. Officers are of the opinion that the pre application process was meaningful and resulted in positive changes which enhanced the proposal when it was submitted in accordance with the parameters of the NPPF.

Equality Impact Assessment

348. An Equality Impact Assessment has been submitted with the application. The Public Sector Equality Duty applies to each public body separately so as such, the LPA is required to have regard to it *in the carrying out of our functions* and the WSFT as the NHS must in carrying out of theirs.
349. Nothing before the LPA, in terms of discharging its duty when considering the application, gives it concern that the development gives rise to discrimination. Accordingly, officers are satisfied that the duty has been met.

Conclusions and Planning Balance

350. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.
351. The majority of the new build part of the application is located in the countryside where there is a clear policy restriction in principle to the development. The development would conflict with policies CS1, CS4 and

CS13 of the Core Strategy, due to the location of the main element of the development (a new District General Hospital) being located within designated countryside. In addition, the proposed location is outside of the allocation for health care and associated use (Policy BV22 of the Bury Vision 2031 document) and not on the allocated health campus identified at Bury West through CS11 of the Core Strategy 2010). Even with large parts of the site being in an existing conforming allocation, officers are satisfied that significant weight should be attributed to the clear breach of the development plan which the proposal represents. The scales must start off unevenly balanced against the scheme and only be approved where material considerations clearly indicate that the overarching policies of the development plan should not be followed.

352. In this case, the context of the site is relevant. Whilst it is outside of a settlement boundary it falls adjacent to the existing West Suffolk Hospital site which itself abuts the housing settlement of Bury St Edmunds which is one of the two towns in the former St Edmundsbury Borough Council area where significant growth should be located. Accordingly, it must be acknowledged the site is in relatively close proximity to large amounts of existing and residential development. The proposed site would have good accessibility to services and facilities by means of transport other than the private car and as such it is not considered to be locationally unsustainable.

353. It is considered that subject to the use of appropriate conditions, the development would accord with development plan policies in relation to the following areas:

- Access, movement and parking and connectivity (policy CS7 of the Core Strategy and policies DM2, DM22, DM44 and DM45)
- Energy and Sustainability (policy CS2 of the Core Strategy and policy DM7 of the JDMPD).
- Archaeological impacts (policy CS2 of the Core Strategy and policy DM20 of the JDMPD)
- Air Quality (policy CS2 of the Core Strategy and policy DM20 of the JDMPD)
- Land Contamination (policy CS2 of the Core Strategy and policy DM20 of the JDMPD)
- Flood risk and drainage (policy CS2 of the Core Strategy and policy DM6 of the JDMPD)
- Loss of residential amenity (policy CS2 of the Core Strategy and policy DM2 of the JDMPD)
- Energy use/ BREEAM (policy CS2 of the Core Strategy and policy DM2 and DM7 of the JDMPD)

354. These factors are therefore neutral in the planning balance.

355. However as identified above the application causes harm in a number of ways. These can be summarised as follows;

- I. Landscape harm – Adverse harm to both the landscape character and visual amenity with the significance of the harm being mostly localised. Contrary to policy DM13 and DM2 of the JDMPD, policy CS2 of the Core Strategy and BV26 of the Bury Vision 2031 document and NPPF para 130 and 174. The harm in this instance is viewed by officers as localised but not without meaningful weight.

- II. Built Heritage Harm – Characterised as “less than substantial” but with a high degree of harm to the setting of a grade II listed building. Although the immediate setting within the walled garden would not be physically altered, the character and visual amenity of the wider parkland which forms the historic setting of the property would be substantially eroded if not lost completely. Contrary to policy DM15 of the JDMPD and para 202 and 206 of the NPPF. In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... ...shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The harm in this instance is considered significant especially given the statutory duty to protect heritage assets.
- III. Harm to Ecology – Loss of irreplaceable habitat. The proposal of a District General hospital is considered to be a wholly exceptional circumstance, and the application would secure a compensation strategy that reflects the harm caused and is thus suitable. Whilst the proposal would compensate for the harm, this still does not mean there is no harm. In this instance the loss of over 11 hectares of irreplaceable habitat is considered profound and weighs heavily against the development.
356. The relevant policies for the identified harm above set out that the harm can be accepted if the proposal delivers public benefits which are sufficiently strong enough to outweigh the harm.
357. The societal public benefits of a District General Hospital are considered to be far reaching and are attributed significant and substantial weight by officers. The benefits serve all sectors, groups and ages of the community and would last for multiple decades. A new hospital in this location would not just serve the population of Bury St Edmunds but approximately a population of 280,000 over a geographical area of roughly 600 square miles.
358. Chapter 14 of the ES “Socio Economic Assessment” states that the Local community will benefit from having a 21st Century hospital and this is classed as “Very Significant beneficial” effect. It also concludes that the provision of new digital technology in the hospital is anticipated as having a “Moderate beneficial effect”. Officers have no reason to disagree with these conclusions.
359. The development would also have economic benefits both during the construction phase and every year throughout the operational phase of the life of the development, employing thousands of members of staff. These economic benefits are considered by officers to be substantial and far-reaching economic benefits. They are given great weight.
360. The applicant highlights the benefits of a hospital having a connection with green infrastructure. Officers give this beneficial but somewhat limited weight.
361. In this instance there is very clear harm caused by the application. The site is located in the countryside, and this weighs significantly against the proposal. Harm is caused to landscape and whilst this is localised it is meaningful. The harm to ecology and the heritage asset is extremely

significant and weighs very heavily against the application. Nevertheless, the proposal is for a hospital. Such a piece of health infrastructure has substantial far reaching economic and social benefits which would serve the whole of the catchment that the hospital would be located in. Officers are satisfied that these economic and social benefits do clearly and demonstrably outweigh the identified harm.

362. In this case, when assessed against the NPPF and development plan as a whole, it is considered that the benefits of the scheme would demonstrably outweigh the harms. The sum of this balance amounts to a material consideration of sufficient weight to clearly justify a determination other than in accordance with the development plan.

363. The application is therefore recommended for APPROVAL.

Conclusion

364. In conclusion, the principle of the proposed development is unacceptable, furthermore there is identified harm to ecology, heritage and landscape. However, the proposed development is considered acceptable as the harm identified is clearly outweighed by the public benefits that the proposal would bring to the wider community.

Recommendation:

365. It is recommended that planning permission be **APPROVED** subject to the following conditions (below) and S106 Heads of Terms detailed at Paragraphs 339-341 of this report:

Documents:

366. All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online [DC/22/0593/HYB](#)

Overview of conditions for DC/22/0593/HYB with complete conditions shown below

1. Standard reserved submission timing and start
2. Requiring submission of Reserve matters Appearance, landscaping, layout and scale
3. Time condition on implementing the approved Change of use of Hardwick Manor
4. List of approved plans

SCC Highways

5. Construction method statement
6. Highway condition survey (Photographic evidence) for Hardwick lane frontage and Horsecroft lane
7. Hardwick Lane Signalised Junction condition and Off site highway improvement
8. Method shown to be followed for construction of improvements to retain trees on Hardwick lane frontage
9. Loading and unloading and car parking (part of the layout)

- 10.EV details
- 11.Cycle storage (staff and general public)
- 12.Construction access on Gypsy Lane visibility splay condition
- 13.Agree the details of the temporary construction accesses on Horsecroft road
- 14.Extinguishing the temporary construction accesses on Horsecroft Road and replanting where necessary after construction.
- 15.Travel plan
- 16.Bus interchange improvement condition
- 17.Shuttle bus and bus shelters
- 18.Disabled parking
- 19.Updated Detailed Construction Logistics Plan (DCLP) that is based on the assumptions of the hereby approved Framework Construction Logistics Plan (FCLP)
- 20.Block up access from Sharp Road

National Highway

- 21.Monitoring and possible alteration of J42 of the A14.

Sustainable transport

- 22.Station Hill to Cullum Road
- 23.Water Meadow
- 24.Rembrandt Way, Barons Road and Laundry Lane
- 25.Route to Sicklesmere Road
- 26.River Linnet
- 27.Agree details for access to Horsecroft road
- 28.On site wayfinding signage for pedestrians and cyclists

LLFA

- 29.Further details in general accordance with the FRA including the construction surface water plan
- 30.Within 28 days of the suds components being practically finished on the existing hospital site a verification report shall be submitted
- 31.Within 28 days of the suds components being practically finished on the new hospital site and wider Hardwick manor parkland a verification report shall be submitted

Contamination

- 32.Control the risks associated with contamination east of the primary road
- 33.Verification report linked to previous condition
- 34.If during development contamination is found
- 35.a scheme for surface water disposal
- 36.No piled foundations
- 37.Materials Management Plan (MMP)

Air Quality

- 38.Air Quality Assessment

Archaeology

- 39.Outline Written Scheme of Investigation
- 40.Site-Specific Written Schemes of Investigation
- 41.Post-Excavation Assessment Reports
- 42.Post Excavation Assessments

BREEAM

- 43.Pre assessment
- 44.Achieve the certificate

Suffolk Fire and rescue

- 45.Fire statement
- 46.Details of fire hydrants

Public Health and Housing

- 47.Hours of construction
- 48.No burning at any time
- 49.External lighting
- 50.Noise details of the planet and machinery
- 51.Post completion Noise assessment of plant and machinery
- 52.Noise details of the backup generator
- 53.Post completion Noise assessment backup generator
- 54.Further acoustic impact assessment for the access road to the new hospital and facilities yard and any necessary mitigation identified and installed. Such as acoustic fence
- 55.Suitable extract and filtration equipment for cooking activities.
- 56.proprietary anti-vibration isolators

Landscape

- 57.Nightime and visual impact assessment
- 58.Environmental Colour Assessment
- 59.Soft Landscaping including in the reserved matters including the structural landscape areas
- 60.Hard Landscaping
- 61.Landscape and Ecological Management Plan (LEMP)
- 62.Protective fencing and planting for veteran trees and other gates, walls and fencing

Ecology

- 63.mitigation and enhancement measures
- 64.EPS licence needs to be submitted before development commences on site
- 65.Biodiversity Enhancement Strategy
- 66.copy of Natural England Mitigation Licence for Great Crested Newts
- 67.Grantian condition to agree and secure the necessary Compensation Strategy details
- 68.mitigation licence for badgers
- 69.CEMP
- 70.Biodiversity Net Gain Design Stage Report
- 71.Lightning design for the site
- 72.Habitat Management and Monitoring Plan (HMMP)
- 73.Biodiversity information boards for areas to be restricted.

Arboriculture

- 74.Arb Method Statement
- 75.arboricultural site supervision and monitoring
- 76.updated Veteran Tree Management Plan based on the changed site use
- 77.Alternative access to Hardwick Manor

Other

- 78.Restore field to be used for the construction compound to its current state
- 79.Relocation of railings

- 80.Limitation on ancillary uses.
- 81.Materials of the building
- 82.Waste refuse bin areas

Standard conditions

1. Application for the approval of the matters reserved by conditions of this permission shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. The development hereby permitted shall be begun not later than whichever is the latest of the following dates:-
 - i) The expiration of three years from the date of this permission; or
 - ii) The expiration of two years from the final approval of the reserved matters; or,
 - iii) In the case of approval on different dates, the final approval of the last such matter to be approved.

Reason: To conform with the requirements of Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. Prior to commencement of development details of the, appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out as approved.

Reason: Required to be imposed pursuant to Section 92 of the Town and Country Planning Act 1990 (as amended) and to enable to the Local Planning Authority to exercise proper control over these aspects of the development.

3. The change of use hereby approved shall be implemented no later than five years from the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990.

4. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the following approved plans and documents, unless otherwise stated below:

| Drawing/Document Title | Reference Number | Revision | Date Received |
|-------------------------------|-------------------------|-----------------|----------------------|
| | | | |

Reason: To define the scope and extent of this permission.

Construction Method Statement

5. Prior to commencement of the development hereby approved, including any site preparation, a Construction Method Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
 - a) parking and turning for vehicles of site personnel, operatives and visitors.
 - b) loading and unloading of plant and materials.
 - c) piling techniques (if applicable).
 - d) Site set-up including arrangements for the storage of plant and materials used in constructing the development and the provision of temporary offices,
 - e) The erection and maintenance of security hoarding including external safety and information signage, lighting, interpretation boards, decorative displays and facilities for public viewing, where appropriate;
 - f) Measures to control the emission of dust and dirt during construction;
 - g) A scheme for recycling/disposing of waste resulting from demolition and construction works;
 - h) Noise method statements and noise levels for each construction activity including any piling and excavation operations;
 - i) Access and protection measures around the construction site for pedestrians, cyclists and other road users including arrangements for diversions during the construction period and for the provision of associated directional signage relating thereto.
 - j) provision and use of wheel washing facilities.
 - k) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works.
 - l) a communications plan to inform local residents of the program of works.
 - m) details of measures to prevent mud from vehicles leaving the site during construction.
 - n) details about haul routes for construction traffic on the highway network and between the site compound and the construction site.
 - o) monitoring and review mechanisms.

Reason: To ensure the satisfactory development of the site and to protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. Additionally In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction and demolition phases. This condition requires matters to be agreed prior to commencement to ensure that appropriate arrangements are put into place before any works take place on site that are likely to impact the area and nearby occupiers.

Highway condition survey condition (Photographic evidence) for Hardwick Lane frontage and Horsecroft Road

6. No part of the development shall be commenced until a photographic condition survey of the part of Hardwick Lane highway fronting the site

and Horsecroft Road to the west of the site has been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of highway safety, to ensure that damage to the highway as a result of the development is repaired at the developer's cost and satisfactory access is maintained for the safety of residents and the public. This is a pre-commencement condition because the required survey must be carried out before any development takes place.

Hardwick Lane signalised junction condition and other improvements shown

7. Before the new hospital hereby approved is first brought into use the highway improvements shown on Drawing No. 65206871-SWE-XX-XX-D-TP-0005 (sheet 1 (Rev P11) and sheet 2 (Rev P 10)) shall be laid out and completed in their entirety. Thereafter they shall be retained in their approved form.

Reason: To ensure that the necessary highway improvements are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety and sustainable travel.

Method for construction of improvements to retain trees on Hardwick lane frontage

8. The highway improvements required by condition 7 shall be carried out in accordance with the details and construction methods shown on Drawing No. 65206871-SWE-XX-XX-D-TP-0016 P04 (sheets 1 to 6) and drawing no. 221110-1.1-HM-TPP-Lane Extract -NC.

Reason: To ensure that the necessary on-site pedestrian and cycle improvements are designed and constructed to an appropriate specification and that no undue harm is caused to important trees on Hardwick Lane that are due to be retained.

Loading, unloading areas

9. Details of loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles shall be submitted to the Local Planning Authority concurrently with the subsequent Reserved Matter application for Layout for the hereby approved hospital. The approved scheme shall be carried out in its entirety before the hereby approved hospital is first brought into use unless otherwise agreed in writing by the Local Planning Authority and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long-term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety. This is a pre-commencement condition because it must be demonstrated that the development can accommodate sufficient parking spaces before construction works may make this prohibitive and in the interests of ensuring highway safety.

EV charging points

10. Prior to the hereby approved hospital being brought into use, at least 15% of car parking spaces shall be equipped with working electric vehicle charging points, which shall be provided for staff and/or visitor use at locations reasonably accessible from car parking spaces. In addition, a further 15% of car parking spaces shall be equipped with ducting to allow them to be retrofitted with electric vehicle charging points. The approved Electric Vehicle Charge Points shall be retained thereafter and maintained in an operational condition. Details of the Electric Vehicle charging points shall be submitted as part of the Reserved Matter "layout" application and shall be approved in writing by the Local Planning Authority prior to installation.

Reason: To promote and facilitate the uptake of electric vehicles on the site in order to minimise emissions and impact on the local air quality, in accordance with Policy DM14 of the Joint Development Management Policies Document, paragraphs 107 and 112 of the NPPF and the Suffolk Parking Standards

Cycle storage

11. Details of staff and public cycle storage to serve the new hospital and other areas across the new campus shall be submitted to the Local Planning Authority concurrently with any Reserved matter application for "Layout" for approval. The submitted details shall include
- a) How the proposed cycle storage accords with best practice guidance as shown in LT01/2020 and Gear Change (or subsequent updated version)
 - b) Location of any cycle storage and whether it serves staff or the general public
 - c) Detailed design demonstrating how cycles will be covered, will be illuminated and secured (for staff storage)
 - d) Storage for non standard cycles
 - e) Charging details for electric bicycles
 - f) How the quantity of cycles relates to the adopted Suffolk County Council Parking standards
 - g) Details of bicycle repair tools

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long-term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking (2019).

Construction access on Gypsy Lane visibility splay condition

12. Before the Gypsy Lane construction access is first used visibility splays shall be provided as shown on Drawing No. 65206871-SWE-ZZ-XX-DR-TP-0016 P01 with an X dimension of 2.4 metres and a Y dimension as shown metres [tangential to the nearside edge of the carriageway] and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or

without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of construction vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Construction accesses on Horsecroft Road condition

13. No part of the development shall be commenced until the construction details and traffic management necessary for safe use for the two temporary accesses on Horsecroft Road (east and west) has been submitted to and agreed in writing by the local planning authority. The submitted details shall generally accord with the details shown on drawing 65206871-SWE-ZZ-XX-DR-TP-0013 P01. The approved details shall be implemented in their entirety before the construction period commences and the approved traffic management arrangements shall be adhered to throughout the construction period.

Reason: To ensure drivers of construction vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Extinguishing the temporary construction accesses on Horsecroft Road and replanting where necessary.

14. Before the new hospital hereby approved is first brought into use details of how the two temporary construction access on the Horsecroft Road (west and east) shall be extinguished and made good shall be submitted to and approved in writing by the local planning authority. The submitted details shall include any necessary soft landscaping drawn to a scale of not less than 1:200. The soft landscaping details shall include a bespoke planting mix written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping shall be implemented in accordance with a phasing plan that shall be submitted to and approved in writing with the Local Planning Authority. The Construction accesses shall be extinguished within two months of the hereby approved hospital being brought into first use.

Reason: To assimilate the development into its surroundings, protect the visual amenity of residents on Sharp Road and protect the character and appearance of the area, in accordance with policies DM2, DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Travel Plan

15.Prior to the hereby approved new hospital being first brought into use, details of the travel arrangements to and from the site for employees and visitors, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Transport Assessment and Travel Plan shall be submitted for the approval in writing by the local planning authority. This Travel Plan must contain the following:

- a. Baseline travel data based upon the information provided in the Transport Assessment, with suitable measures, objectives and identified targets to reduce the vehicular trips made by employees and visitors across the whole development, with suitable remedial measures identified to be implemented if these objectives and targets are not met.
- b. Appointment of a suitably qualified Travel Plan Coordinator to implement the Travel Plan in full and clearly identify their contact details in the Travel Plan.
- c. A commitment to monitor the vehicular trips generated by the employees and submit a revised (or Full) Travel Plan no later than six months after the hereby approved hospital is first brought into operation.
- d. A further commitment to monitor the Travel Plan annually on each anniversary of the approval of the Full Travel Plan and provide the outcome in a revised Travel Plan to be submitted to and approved in writing by the Local Planning Authority for a minimum period of five years using the same methodology as the baseline monitoring.
- e. A suitable marketing strategy to ensure that all employees and visitors on the site are engaged in the Travel Plan process.
- f. A Travel Plan budget that covers the full implementation of the Travel Plan
- g. A copy of an employee travel pack that includes information to encourage employees to use sustainable travel in the local area.

The hereby approved hospital shall not be brought into operation until the Travel Plan has been agreed. The approved Travel Plan measures shall be implemented in accordance with a timetable that shall be included in the Travel Plan and shall thereafter adhered to in accordance with the approved Travel Plan.

Reason: In the interest of sustainable development as set out in the NPPF, and to be in accordance with JDMPD policy DM45.

Bus interchange improvement condition

16.Prior to the hereby approved hospital being first brought into use the bus interchange arrangements shall have been laid out and constructed in accordance with the details shown on Drawing No. 65206871-SWE-XX-XX-D-TP-0011 P02. Thereafter they shall be retained in its approved form.

Reason: To promote and facilitate access to sustainable transport modes and to provide safe and suitable access for all users in accordance with the NPPF (July 2021) Para. 110 and Para. 112.

Bus stop improvement condition

17.Prior to the hereby approved hospital first being brought into use, details of an onsite electric shuttle bus service shall be submitted to and approved

in writing by the Local Planning Authority. The submitted details shall include:

- a) full details/specification of the bus to be used
- b) full detail of all on site bus shelters/ bus stops
- c) details of the frequency including hours of operation during the day, days of the week and service throughout the year
- d) routing details around the site

The hereby approved details shall be implemented on the first day of the hereby approved hospital is brought into use and the service shall operate as approved unless otherwise agreed in writing with the Local Planning Authority.

Reason: To encourage the use of sustainable forms of transport and reduce dependence on the private motor vehicle, in accordance with policy DM2 and DM45 of the Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Disabled Parking

18. The submitted Reserved Matter for "Layout" shall detail the provision that will be made for disabled parking. The approved details shall be implemented and available from the first day that the hereby approved hospital is first brought into use and shall be retained for the approved purpose thereafter.

Reason: To ensure the provision of adequate parking spaces for disabled people, in accordance with policy DM2 and DM46 of the West Suffolk Joint Development Management Policies Document 2015, the Suffolk Guidance for Parking 2015 and Chapters 9 and 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Updated Detailed Construction Logistics Plan

19. Before the construction compound is prepared for the construction phase of the hereby approved new hospital a Detailed Construction Logistics Plan (DCLP) that is based on the assumptions of the hereby approved Framework Construction Logistics Plan (FCLP) shall be submitted to and approved in writing by the local planning authority. The approved details of the DCLP shall be adhered to throughout the construction and demolish phases unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of Highway Safety and neighbour amenity.

Block up Sharp Road

20. Within 6 months of the development hereby approved commencing details of how the current access into the site from Sharp Road will be blocked up whilst the proposed landscaping is maturing shall be submitted to and approved in writing by the local planning authority. The approved details shall be installed before the new hospital is first brought into use and thereafter retained.

Reason: In the interest of neighbour amenity.

Monitoring of J42 of the A14 and possible mitigation

21.

- a) A queue detector loop will be installed at the 80% capacity point on the A14 J42 westbound off slip in order to monitor whether queuing is recorded to extend back beyond the queue detectors, for a period of more than 10 minutes on more than 3 occasions in a rolling 7 days. If queuing is recorded to extend back beyond the queue detectors, for a period of more than 10 minutes on more than 3 occasions in a rolling 7 days than parts b) to d) below would not apply. The installation of the queue detectors and the period of time that it will be in place shall be agreed in writing with the local planning authority before any development commences on site.

Should queuing not be recorded as per Part a):

- b) For five years from when the hereby approved hospital is first brought into use, continuous monitoring of queue lengths will take place on the westbound A14 J42 off slip making use of existing or new queue detectors to monitor whether queuing is recorded to extend back beyond the queue detectors for a period of more than 10 minutes on more than 3 occasions in a rolling 7 day week in any 7 day period.
- c) If queuing as defined in Part b) is detected, then a mechanism to ascertain whether the queuing is solely as a result of the new hospital development will be submitted to and agreed in writing with the LPA.
- d) If it is demonstrated that unacceptable queuing is the responsibility of the new hospital development as defined in Part c) above, then details shall be submitted to and agreed in writing with the Local Planning Authority that generally accord with those shown on drawing 65206871-SWE_XX_XX_D-TP-0021 Rev P01. The approved details shall be laid out and constructed in their entirety within 12 months of the assessment as defined in part c) being concluded and thereafter they shall be retained in the approved form.

Reason: To ensure that the A14 continue to serve its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

Off site sustainable routes

22. (Station Hill to Cullum Road)

Before development commences on the hereby approved hospital, details of enhanced walking and cycling facilities between the Bury St Edmunds Train Station and the Cycle Track that links into Cullum Road shall be submitted at a scale of 1:200 and approved in writing by the Local Planning Authority. The submitted details shall generally accord with the proposals shown on drawing 66202530-SWE-ZZ-XX-DR-TP-0010 Rev P02, 66202530-SWE-ZZ-XX-DR-TP-0011 Rev P02, 66202530-SWE-ZZ-XX-DR-TP-0012 Rev P01 and 66202530-SWE-ZZ-XX-DR-TP-0013 Rev P01 Thereafter the approved details shall be implemented in their entirety before the new hospital hereby approved is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45.

23.(Water meadow)

Within 12 months of the first Reserved Matters application for the new hospital building being submitted to the Local Planning Authority, the following details shall be submitted to and agreed in writing with the Local Planning Authority:

- a) Full design details at a scale of 1:50 of a proposed boardwalk that is in general accordance with the location shown on drawing 65206871-SWE-XX-XX-DR-TP-0018 P02
- b) A Flood Risk Assessment to support the proposed design work that demonstrates that the proposed development would not block or divert existing or future flows of either fluvial (river) or pluvial (surface water) flood water
- c) Details of any necessary flood storage compensation
- d) 12 months ecology survey of the site with recommendations which will help inform the Construction Method Statement and design of the boardwalk
- e) Details of measures to mitigate impacts on protected species and other important habitats
- f) A Construction Method Statement including details on how works will be undertaken without disrupting flows of water within the floodplain
- g) A maintenance regime which includes i) vegetation clearance, ii) the boardwalk structure and the surface and iii) debris clearance in order to ensure the flow of flood water within the function floodplain

The approved details shall thereafter be built out in accordance with the Construction Method Statement and the boardwalk shall be made available for public use before the hereby approved hospital is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45.

24.(Rembrandt Way, Barons Road and Laundry Lane)

Before development commences on the hereby approved hospital, details of enhanced walking and cycling facilities along Rembrandt Way, Barons Road and Laundry Lane shall be submitted to at a scale of 1:200 and approved in writing by the Local Planning Authority. The submitted details shall generally accord with the proposals shown on drawing 66202530-SWE-ZZ-XX-DR-TP-0017 Rev P02, 66202530-SWE-ZZ-XX-DR-TP-0018 Rev P01 and 66202530-SWE-ZZ-XX-DR-TP-0019 Rev P01. Thereafter the approved details shall be implemented in their entirety before the new hospital hereby approved is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45

25.(Sicklesmere Road across Hardwick Heath/ Fallowfield Walk/ Mayfield Road/Old Town Lane/ Plovers way)

Before development commences on the hereby approved new hospital details of a walking and cycling route between the hereby approved new hospital and Sicklesmere Road shall be submitted to, at a scale of 1:200, and approved in writing by the Local Planning Authority. The submitted details shall generally accord with the proposals shown on drawing 66202530-SWE-ZZ-XX-DR-TP-0022 Rev P03, 66202530-SWE-ZZ-XX-DR-TP-0023 Rev P02, 66202530-SWE-ZZ-XX-DR-TP-0024 Rev P03, 66202530-SWE-ZZ-XX-DR-TP-0025 Rev P02 Thereafter the approved details shall be implemented in their entirety before the new hospital hereby approved is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45.

26.River Linnet route

Before development commences on the hereby approved new hospital details of a walking and cycling route along the River Linnet shall be submitted to and approved in writing by the Local planning Authority. The submitted details shall generally accord with the details shown on drawing 65206871-SWE-XX-XX-D-TP-0001 P01 (page 1-5) and be submitted at a scale of 1:200. Thereafter the approved details shall be implemented in their entirety before the new hospital hereby approved is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45.

Details for access to Horsecroft road

27.Within 6 months of the works on the foundations of the hereby approved new hospital commencing, full details of the surface and lighting to be installed through the western tree belt for Access K (as shown on drawing RYD-MM-ZZ-DR-L2004 Rev P16) shall be submitted to and approved in writing by the Local Planning Authority. The access and route through the western treebelt shall be installed in accordance with the approved details and a pedestrian/cycle link shall be available from Horsecroft Road to the new hospital before the new hospital hereby approved is first brought into use.

Reason: To ensure that the new development has sufficient walking and cycling infrastructure serving it in accordance with Policies CS2, CS7, DM2 and DM45.

On site signage for pedestrians and cyclists

28.Before the hereby approved hospital is first brought an on site signage strategy for pedestrians and cyclists shall be submitted to and approved in writing by the local planning authority. The signage shall direct to both onsite destinations and key off site destinations like the Bury St Edmunds train station and town centre stipulating time and distance. The approved signage thereafter shall be installed before the hereby approved hospital is

first brought into use and thereafter retained unless otherwise agreed in writing with the Local Planning Authority.

Reason: To encourage the use of sustainable forms of transport and reduce dependence on the private motor vehicle, in accordance with policy DM2 and DM45 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

LLFA

Further details in general accordance with the FRA including the construction surface water plan

29. Unless otherwise agreed in writing with the Local Planning Authority Concurrent with the submission of the layout reserved matter application for site a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:
- a) Dimensioned plans and drawings of the surface water drainage scheme;
 - b) Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c) If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to QBAR or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d) Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e) Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year rainfall event including climate change, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f) Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
 - g) Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.
 - h) Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include: Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
 - a) Temporary drainage systems

- b) Measures for managing pollution / water quality and protecting controlled waters and watercourses
- c) Measures for managing any on or offsite flood risk associated with construction

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

Within 28 days of the suds components being practically finished on the existing hospital site a verification report shall be submitted

30. Within 28 days of practical completion of the final SuDS component on the existing hospital site, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA for that part of the site, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

Within 28 days of the suds components being practically finished on the new hospital site and wider Hardwick manor parkland a verification report shall be submitted

31. Within 28 days of practical completion of the final SuDS component serving the new hospital and wider Hardwick Manor site, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk within the county of Suffolk

Control the risks associated with contamination east of the primary road

32.No development approved by this planning permission shall commence to the east of the proposed new primary vehicle access route on the existing hospital site, other than above ground demolition, until the following components to deal with the risks associated with contamination of the relevant part of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

- a) A site investigation scheme,
- b) The results of a site investigation based on i) and a detailed risk assessment, including a revised Conceptual Site Model (CSM)
- c) Based on the risk assessment in ii), a remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184, Environment Agency Groundwater Protection: Principles and Practice (GP3), Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy.

Verification report linked to previous condition

33.If land contamination remediation is considered necessary in a part of the area defined in Condition 32, a verification report demonstrating completion of works as set out in the remediation strategy shall be submitted to the Local Planning Authority before first use of any of the new structures or car parks in the relevant part of this area.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184, Environment Agency Groundwater Protection: Principles and Practice (GP3), Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy.

If during development contamination is found

34.If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184, Environment Agency Groundwater Protection: Principles and

Practice (GP3), Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy.

A scheme for surface water disposal

35. Development shall not begin until a scheme for surface water disposal has been submitted to and approved in writing by the Local Planning Authority. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. The development shall be carried out in accordance with the approval details.

No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184 and relevant Environment Agency Groundwater Protection Position Statements.

No piled foundations

36. Piled or other deep foundations, or penetrative ground source heating cooling systems, shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184 and relevant Environment Agency Groundwater Protection Position Statements.

Materials Management Plan (MMP)

37. Prior to importation or reuse of material for the development (or phase of) a Materials Management Plan (MMP) shall be submitted to and approved in writing by the Local Planning Authority. The MMP shall include:

1. Details of the volumes and types of material proposed to be imported or reused on site;
2. Details of the proposed source(s) of the imported or reused material(s);
3. An inspection and sampling strategy for the testing of excavation formations;
4. A stockpile validation strategy;
5. Details of the chemical testing to be undertaken before placement of material onto the site;
6. Details of arisings processing; and
7. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in 1 to 6 above are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action; and

confirmation of the chain of evidence to be kept during the materials movement including: material importation, reuse placement and removal from and to the development.

All works will be undertaken in accordance with the approved document.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 174, 183, 184 and relevant Environment Agency Groundwater Protection Position Statements.

Air quality

Air Quality Assessment

38. As part of the first reserved matters application, an air quality assessment shall be submitted that assess both the impact of the vehicle movements from the proposed construction/demolition process and the impact from the backup generator (and any other on site combustion if applicable) on the local air quality. This assessment shall include both nitrogen dioxide and particulates (PM10 and PM2.5). Where any impact is identified as moderate or above suitable mitigation measures shall be identified and implemented as agreed.

Reason: To ensure no deterioration to the local air quality in line with DM14 of the Joint Development Management Policies Document and protect receptors of air pollution in the local area.

Archaeology

Outline Written Scheme of Investigation

39. No construction works, or site preparation works, or ecological mitigation works, involving ground disturbance, shall commence on any phase of (part of) the authorised development, until an Archaeological Outline Written Scheme of Investigation (OWSI), after consultation with the archaeological advisors to the local planning authorities, has been submitted and approved in writing by the local planning authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and

timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy DM20 of the Joint Development Management Policies Document 2015, Policy CS2 of St Edmundsbury Core Strategy 2010 and the National Planning Policy Framework (2021).

Site-Specific Written Schemes of Investigation

40.No construction works, or site preparation works, or ecological mitigation works, involving ground disturbance, shall commence on any phase of (part of) the authorised development, until Archaeological Site-Specific Written Schemes of Investigation (SSWSIs) for that phase (part of) the authorised development, in compliance with the Archaeological Outline Written Scheme of Investigation (OWSI), approved under Condition 39, after consultation with the archaeological advisors to the local planning authorities, has been submitted and approved in writing by the local planning authority.

Each scheme of investigation shall include an assessment of significance specific to the particular site and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy DM20 of the Joint Development Management Policies Document 2015, Policy CS2 of St Edmundsbury Core Strategy 2010 and the National Planning Policy Framework (2021).

Post-Excavation Assessment Reports

41.All archaeological site investigations must be completed for the relevant phase of construction, preparation or ecological mitigation works in accordance with the Outline Written Scheme of Investigation (OWSI), and Site-Specific Written Schemes of Investigation (SSWSI) for that phase, and provision made for analysis and preparation of a Post-Excavation Assessment Reports (PXAs).

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of

archaeological assets affected by this development, in accordance with Policy DM20 of the Joint Development Management Policies Document 2015, Policy CS2 of St Edmundsbury Core Strategy 2010 and the National Planning Policy Framework (2021).

Post Excavation Assessments

- 42.No building shall be occupied until all archaeological Post Excavation Assessments (PXAs) have been completed for all parts of the authorised development and related ecological mitigation sites, and an Updated Project Design (UPD), detailing the scope of Post-Excavation Analysis and Publication, in accordance with the approved Outline Written Scheme of Investigation (OWSI) and Site Specific Written Schemes of Investigation (SSWSIs), has been submitted and approved by the local planning authority, and funds secured to deliver the works identified in the UPD, publication, and deposition of the full archive with Suffolk County Council Archaeological Service (Archive).

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy DM20 of the Joint Development Management Policies Document 2015, Policy CS2 of St Edmundsbury Core Strategy 2010 and the National Planning Policy Framework (2021).

BREEAM

Pre assessment

- 43.Before development commences on the hereby approved hospital, a BREEAM pre-assessment shall be submitted to and approved in writing by the Local Planning Authority which demonstrates how the hereby approved hospital will achieve at least an Excellent BREEAM rating with a greater than 5% buffer to allow for changes in design during construction.

Reason: In the interests of sustainability as required in policy DM7 of the Joint Development Management Policy Document 2015.

Achieve the certificate

- 44.Within 6 months of the hereby approved hospital first being brought into use a Final BREEAM Certificate shall be submitted to the Local Planning Authority demonstrating that the hereby approved hospital achieved a Final Certificate rating of at least Excellent in accordance with the requirements of the relevant BREEAM scheme.

Reason: In the interests of sustainability as required in policy DM7 of the Joint Development Management Policy Document 2015.

Suffolk Fire and Rescue

Fire statement

- 45.If subsequent Reserved Matter applications show that the hereby approved hospital exceeds 18 metres in height a Fire Statement shall be submitted and approved in writing by the Local Planning Authority prior to works

commencing on site. The development shall be carried out in accordance with the details approved and shall be maintained as such thereafter."

Reason: To ensure Measures relating to fire safety matters are incorporated at the planning stage for schemes involving a relevant high-rise building in accordance with Planning Practice Guidance on Fire Safety.

Details of fire hydrants

46. Within 6 months of development commencing on the hereby approved hospital building, details for the provision of fire hydrants shall be submitted to and approved, in writing, by the Local Planning Authority

The submitted details shall include

- a) Amount of fire hydrants proposed, which will need to be placed on a main, that is determined by a water company or a self-lay company, to provide a minimum sustained outlet discharge of 2100lpm to be acceptable for firefighting purpose
- b) that all fire hydrants are within 90metre of a dry riser if the hereby approved hospital is over 18 metres in height
- c) Road layout details showing how all fire vehicles will move around the site and buildings
- d) mains lay drawing/s provided by a water company or self-lay company that demonstrate how the proposed amount of fire hydrants was determined.

Thereafter the fire hydrants shall be retained in their approved form unless the prior written consent of the Local Planning Authority is obtained for any variation.

Reason: To provide an adequate water provision for firefighting.

Public Health and Housing

Hours of construction

47. Any site preparation, demolition, construction works and ancillary activities, including access road works and deliveries to / collections from the site in connection with the development works shall only be carried out between the hours of:

08:00 to 18:00 Mondays to Fridays

08:00 to 13.00 Saturdays

And at no times during Sundays or Bank / Public Holidays without the prior written consent of the Local Planning Authority.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

No burning at any time

48. The burning of any waste either during the construction phase or after the site becomes operational is prohibited at any time within the site.

Reason: To ensure that the development will not have a negative impact on ground and surface water and to protect the amenity of adjacent areas, in accordance with policies DM6 and DM32 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 14 and 15 of

the National Planning Policy Framework and all relevant Core Strategy Policies.

External lighting

49. Any external artificial lighting at the development hereby approved shall not exceed lux levels of vertical illumination at neighbouring premises that are recommended by the Institution of Lighting Professionals Guidance Note 01/21 'Guidance notes for the reduction of obtrusive light'. Lighting should be minimised and glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Note.

Reason: To prevent light pollution and protect the amenities of occupiers of properties in the locality, in accordance with policy DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Noise details of the planet and machinery

50. Prior to commencement of the development hereby approved details shall be submitted to and approved in writing by the Local Planning Authority of the external sound level emitted from the installation of any external mechanical plant / equipment associated with the development hereby approved and mitigation measures as appropriate. The measures shall ensure that the external sound level emitted will be lower than the lowest existing background sound level by at least 10dB inclusive of any penalties for tonality, intermittency, impulsivity or other distinctive acoustic characteristics in order to prevent any adverse impact. The assessment shall be made in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' at the nearest and / or most affected noise sensitive premises, with all equipment operating together at maximum capacity and inclusive of any penalty for tonality, intermittency, impulsivity or other distinctive acoustic characteristics.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

Post completion Noise assessment of plant and machinery

51. Within 2 months of the hereby approved hospital first being brought into use a post-completion noise assessment shall be carried out on all external mechanical plant and submitted to and approved in writing by the Local Planning Authority to confirm compliance with the sound criteria above and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to first use of the development and thereafter be permanently retained.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

Noise details of the backup generator

52. Prior to commencement of the development hereby approved details shall be submitted to and approved in writing by the Local Planning Authority of the external sound level emitted from the installation of the emergency

back up generator associated with the development hereby approved and mitigation measures as appropriate. The measures shall ensure that the external sound level emitted will be lower than the lowest existing background sound level by at least 10dB inclusive of any penalties for tonality, intermittency, impulsivity or other distinctive acoustic characteristics in order to prevent any adverse impact. The assessment shall be made in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' at the nearest and / or most affected noise sensitive premises, with all equipment operating together at maximum capacity and inclusive of any penalty for tonality, intermittency, impulsivity or other distinctive acoustic characteristics.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

Post completion Noise assessment backup generator

53. Within 2 months of the hereby approved hospital first being brought into use a post-completion noise assessment shall be carried out of the emergency back up generator and submitted to and approved in writing by the Local Planning Authority to confirm compliance with the sound criteria above and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to first use of the development and thereafter be permanently retained.

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

Further acoustic impact assessment for the access road to the new hospital and facilities yard and any necessary mitigation identified and installed. Such as acoustic fence

54. Before development commences a noise impact assessment on the link road (the road from the existing site to the new hospital) and the facilities management yard at the south end of the new hospital shall be submitted to and approved in writing by the local planning authority. The noise impact assessment will assess the impact of these areas on nearby residential properties. This assessment is likely to require consideration of the following mitigation measures to restrict noise levels to 45 dB LA10, 18hour at the façade(s) of the nearest sensitive receptor(s) where reasonably practical:

- Road alignment;
- Speed restriction;
- Restrictions on ambulance sirens in the Site unless absolutely necessary;
- Noise barriers between the road/facility management yard and the receptors.
- Facilities Management Yard Plan which would include hours of deliveries and service vehicles coming to and from site and details on audible warning reversing signals for vehicles and loading and unloading bays

Any identified mitigation shall be installed/ retained thereafter/ adhered to in the case of the Facilities Management Yard Plan

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies.

Suitable extract and filtration equipment for cooking activities.

55.The commercial kitchen extraction and odour control system associated with the development hereby approved shall comply with the EMAQ+ document 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems' in respect of its installation, operation, and maintenance of the odour abatement equipment and extract system, including the height of the extract duct and vertical discharge outlet. Approved details shall be implemented prior to the use of the development and thereafter be permanently retained.

Reason: To protect the amenity of residential properties.

proprietary anti-vibration isolators

56.Prior to the hereby approved hospital being brought into first use, any external mechanical plant / equipment, including (but not limited to) the commercial kitchen extraction and odour control system and associated external ducting etc associated with the development hereby approved shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

Reason: To protect the amenity of residential properties.

Landscape

Nightime and visual impact assessment

57.Prior or concurrent with any reserved matters application for Appearance a night-time landscape and visual assessment must be submitted and approved by the LPA. This should include a description of the night time baseline and a commentary on the effect of the proposed scheme (during construction and operation) on the night time environment, which includes / supported by:

- a) Night time photographs showing night time views and existing sources of lighting in the landscape
- b) Night time visualisations showing night time views and the proposed development and its potential lighting.
- c) Analysis of maps on existing levels of illuminance / light pollution in the study area
- d) Landscape and visual assessment schedules describing; the baseline night time situation / existing sources of lighting in the landscape / view and;
- e) The anticipated change in lighting as a result of the proposed development, both on landscape and visual receptors (key viewpoints include, but not limited to: Gypsy Lane, Glastonbury Road, Bridleways Nowton BR1 and Nowton BR2 and Park Lane.)

Reason: To assimilate the development into its surroundings and protect the character and appearance of the area, in accordance with policies DM2 and DM13 of the West Suffolk Joint Development Management Policies

Environmental Colour Assessment

- 58.Prior or concurrent with any reserved matters application for Appearance an Environment Colour Assessment (ECA) needs to be produced (in accordance with the Natural Colour System) and approved by the LPA. The colour palette which is developed through the ECA process must be based on on-the-ground surveys and supported by a desk top study, which analyses and synthesises the colours found within the local landscapes. This study must then inform the colour palette for built form.

Reason: To assimilate the development into its surroundings and protect the character and appearance of the area, in accordance with policies DM2 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Soft Landscaping including in the reserved matters including the structural landscape areas

- 59.Concurrent with any reserved matters application for Landscape, a scheme of soft landscaping for the site (including the northern and southern Structural Landscape buffer areas) drawn to a scale of not less than 1:200 shall be submitted to and approved in writing by the Local Planning Authority. The soft landscaping details shall include a bespoke planting mix that takes into consideration impacts on residential visual amenity; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping shall be implemented in accordance with a phasing plan that shall be submitted to and approved in writing with the Local Planning Authority at the same time as the Reserved Matter for Landscape and delivered in accordance with the approved phasing plan.

Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

Reason: To assimilate the development into its surroundings, protect the visual amenity of residents on Sharp Road and protect the character and appearance of the area, in accordance with policies DM2, DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Hard Landscaping

- 60.No development above ground level shall take place until details of a hard landscaping scheme for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example furniture, refuse and/or other storage units, signs, lighting and similar features); proposed and existing

functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

Reason: To assimilate the development into its surroundings and protect the character and appearance of the area, in accordance with policies DM2 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Landscape and Ecological Management Plan (LEMP)

61. Concurrent with the last Reserved Matters application, a Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by the local planning. The content of the LEMP shall include the following:
- a. Description and evaluation of features to be managed.
 - b. BNG management and monitoring plan for the length of time to achieve condition of each habitat required by BNG Metric.
 - c. Ecological trends and constraints on site that might influence management.
 - d. Aims and objectives of management.
 - e. Appropriate management options for achieving aims and objectives.
 - f. Prescriptions for management actions.
 - g. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
 - h. Details of the body or organization responsible for implementation of the plan.
 - i. Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure the longevity of the landscaping scheme and protect the visual amenity and character of the area, in accordance with policy DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species)

Protective fencing and planting for veteran trees and other gates, walls and fencing

62. Concurrent with the submission of the details required under condition 59 (soft landscaping) details of the Protection Barriers necessary for arboretum veteran trees and other areas as shown on drawing Proposed Zones of Restricted Access WSH RYD MM ZZ DR L 2100 Rev P6 and any other fencing, walls, boundary treatments including gates shall be submitted to and approved in writing by the Local Planning Authority. The details shall specify the siting, design, height and materials of the screen walls/fences/ gates to be constructed or erected and/or the species, spacing and height of hedging to be retained and / or planted together with a programme of implementation. Any planting removed, dying, being severely damaged or becoming seriously diseased within five years of planting shall be replaced by soft landscaping of similar size and species to those originally required to be planted. The works shall be completed in accordance with the approved details.

Reason: To ensure that the loss of the irreplaceable habitat is compensated for in accordance with para 180 (c) of the NPPF

Ecology

mitigation and enhancement measures

63. Prior to development commencing on site a timetable shall be submitted to and approved in writing by the local planning authority which sets out when all the mitigation and enhancement measures as detailed in the Environmental Statement biodiversity chapter 11 (Sweco, April 2022) will be delivered. The approved mitigation and enhancement measures shall be implemented in accordance with the agree timetable and thereafter retained in the approved form. An appropriately competent person (for example an ecological clerk of works (ECoW)) shall provide on-site ecological expertise during construction of the development. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

EPS licence needs to be submitted before development commences on site

64. Prior to any commencement of development on the hereby approved development a copy of the EPS licence for bats shall be submitted to the local planning authority. Any works which will impact the breeding / resting place of bats (European Protected Species (EPS)), shall not commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
- b) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.

Reason: To conserve protected species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s17 Crime & Disorder Act 1998.

Biodiversity Enhancement Strategy

65. Within 6 months of development commencing of the hereby approved hospital a Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority. The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;
- b) detailed designs to achieve stated objectives;
- c) locations of proposed enhancement measures by appropriate maps and plans;
- d) persons responsible for implementing the enhancement measures;
- e) details of initial aftercare and long-term maintenance (where relevant).
- f) Delivery implementation timeline of the Biodiversity Strategy

The works shall be implemented in accordance with the delivery timeline submitted under part f) and shall be retained in the approved manner thereafter.

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

copy of Natural England Mitigation Licence for Great Crested Newts

66. Concurrent with the submission of the last Reserved Matter application a copy of Natural England Mitigation Licence for Great Crested Newts shall be submitted to the local planning authority.

Any works which will impact the breeding / resting place of great crested newt, shall not in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
- b) a method statement relating to a registered site supplied by an individual registered to use a Great Crested Newt Low Impact Class Licence; or
- c) a GCN District Level Licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
- d) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."

Reason: To conserve protected species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s17 Crime & Disorder Act 1998.

Grampian condition to agree and secure the necessary Compensation Strategy details

67. Before any development commences on site (including the translocation of waxcap turfs, or archaeological trial trenching) the details of the land that will be brought forward to deliver the compensation strategy shall be submitted to and agreed in writing with the Local Planning Authority. The submitted details shall be in accordance with the principles established in the Compensation Strategy for the Loss of Irreplaceable Habitat (Sweco, 1 August 2022) but also include the following detail;
- a) purpose and conservation objectives for the proposed offsite compensation measures;
 - b) detailed designs to achieve the stated conservation objectives;
 - c) locations of proposed compensation measures by appropriate maps and plans;
 - d) translocation method statement for the waxcap grassland to be translocated which shall be informed by the eDNA surveys;
 - e) persons responsible for implementing the compensation measures;
 - f) details of initial aftercare and long-term maintenance to meet the required objectives.
 - g) confirmation and full details of the proposed legal mechanism to secure and deliver the land required to compensate for the loss of irreplaceable habitat in general accordance with the "Loss of Irreplaceable Habitat" Document Reference: 65206048-SWE-ZZ-XX-RP-J-0001 Rev C01". The details submitted shall demonstrate that the land has been secured for at least 125 years in accordance with the conservation objectives.
 - h) details of the maintenance including funding mechanism and timeframe (which shall be at least 30 Years) for the maintenance and ongoing monitoring; and persons responsible for maintenance and monitoring
 - i) a timetable for implementation of the compensation measures.

The approved details shall be implemented in their entirety in accordance with the agreed timetable.

Reason: To ensure that the loss of the irreplaceable habitat is compensated for in accordance with para 180 (c) of the NPPF

mitigation licence for badgers

68. Concurrent with the submission of the last Reserved Matters application a copy of mitigation licence for badgers shall be submitted to the local planning authority.

The following sett closure shall not in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant Badger Protection Act 1992 authorizing the specified activity/development to go ahead; or
- b) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.

Reason: To conserve protected species and allow the LPA to discharge its duties under the Badger Protection Act 1992 and s17 Crime & Disorder Act 1998.

CEMP

69. Concurrent with the submission of last Reserved Matter application a Construction Environmental Management Plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.
- i) Containment, control and removal of any Invasive non-native species present on site

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority"

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

Biodiversity Net Gain Design Stage Report

70. Concurrent with the submission of the last Reserved Matter application a Biodiversity Net Gain Design Stage Report, in line with Table 2 of CIEEM Biodiversity Net Gain report and audit templates (July 2021), shall be submitted to and approved in writing by the local planning authority which provides a minimum of 10% measurable biodiversity net gain, using the DEFRA Biodiversity Metric 3.0 or any successor.

The content of the Biodiversity Net Gain report should include the following:

- Baseline data collection and assessment of current conditions on site;
- a) A commitment to measures in line with the Mitigation Hierarchy and evidence of how BNG Principles have been applied to maximise benefits to biodiversity;
 - b) Provision of the full BNG calculations, with plans for pre and post development and detailed justifications for the choice of habitat types, distinctiveness and condition, connectivity and ecological functionality;
 - c) Details of the implementation measures and management of proposals;
 - d) Details of the monitoring and independent auditing measures.

The proposed enhancement measures shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.

Reasons: In order to demonstrate measurable net gain and allow the LPA to discharge its duties under the NPPF (2021)

Lighting design for the site

71. Concurrent with the submission of the last Reserved Matter application a lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Habitat Management and Monitoring Plan (HMMP)

72. Concurrent with the submission of the last Reserved Matters application a Habitat Management and Monitoring Plan (HMMP) shall be submitted to, and be approved in writing by, the local planning authority prior to occupation of the development.

The content of the HMP shall include the following:

- a) Description and evaluation of compensatory habitats created off site to be managed and length of time to achieve condition required by BNG Metric.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management and monitoring.
- d) Appropriate management and monitoring options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period in perpetuity with 30 years funding).
- g) Details of the body or organisation responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning

biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."

Reason: To allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)

Biodiversity information boards for areas to be restricted.

73. Before the hereby approved hospital is first brought into use, details shall be submitted to and agreed in writing with the Local Planning Authority on the location of at least 5 information boards and content of the boards which will inform the general public of the importance of the ecology on the wider Hardwick Manor site, setting out why the general public are restricted from accessing a number of key ecologically important and sensitive locations like the arboretum, orchard and buffer zones of candidate veteran and veteran trees. The hereby approved signage shall be implemented before the hereby approved hospital is first brought into use and retained thereafter unless otherwise agreed in writing with the Local planning

Reason: To protect the ecologically sensitive parts of the site after the general public have access to the site in accordance with Policy Dm10, Dm11 and Dm13 of the JDMPD.

Arb conditions

Arb Method Statement

74. Prior to commencement of development a finalised Arboricultural Method Statement (including any demolition, groundworks and site clearance) shall be submitted to and approved in writing by the Local Planning Authority. The Statement should include details of the following:

- a. Measures for the protection of those trees and hedges on the application site that are to be retained,
- b. Details of all construction measures within the 'Root Protection Area' (defined by a radius of dbh x 12 where dbh is the diameter of the trunk measured at a height of 1.5m above ground level) of those trees on the application site which are to be retained specifying the position, depth, and method of construction/installation/excavation of service trenches, building foundations, hard standings, roads and footpaths,
- c. A schedule of proposed surgery works to be undertaken to those trees and hedges on the application site which are to be retained.
- d. Construction phasing Plan

The development shall be carried out in accordance with the approved Method Statement unless agreed in writing by the Local Planning Authority.

Reason: To ensure that the trees and hedges on site are adequately protected, to safeguard the character and visual amenity of the area, in accordance with policies DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to

commencement of development to ensure that existing trees are adequately protected prior to any ground disturbance.

arboricultural site supervision and monitoring

75.The Arboricultural Method Statement and plan submitted in support of the application shall be adhered to in full, subject to the pre-arranged tree protection monitoring and site supervision, detailed in the submitted Method Statement, to be carried out at a minimum of every four weeks during the construction phase, by a suitably qualified tree specialist. Details of site supervision shall be provided in writing after each visit to the Local Planning Authority.

Reason: Required to safeguard and enhance the character and amenity of the site and locality to avoid any irreversible damage to retained trees pursuant to section 197 of the Town and Country Planning Act 1990 and in accordance with the Local Plan Policies.

updated Veteran Tree Management Plan based on the changed site use

76.Prior to commencement of development a Construction Phasing Plan shall be submitted to and approved in writing by the Local Planning Authority. No development shall occur within any construction phase shown in the Construction Phase Plan until an updated Veteran Tree Management Plan for that phase which is based on the changed site use (publicly available hospital) has been submitted to and agreed in writing with the Local Planning Authority.

The Veteran Tree Management Plan shall be implemented in accordance with the approved details.

Reason: Required to safeguard and enhance the character and amenity of the site and locality to avoid any irreversible damage to retained trees pursuant to section 197 of the Town and Country Planning Act 1990 and in accordance with the Local Plan Policies.

Alternative access to Hardwick Manor

77.The change of use of Hardwick Manor from residential dwelling (C3) to health related uses (C2) shall not commence until the existing access to the property has been extinguished and full details of an alternative access (in accordance with drawing No. WSH-RHD-MM-ZZ-DR-L-2004 Rev P16) have been submitted to and agreed in writing by the Local Planning Authority. The submitted details shall include;

- a) Details of Trees to be removed
- b) Construction details and alignment of the new access in relation to trees in the immediate area
- c) Lighting to be installed
- d) Details of the existing access to be extinguished
- e) Method statement for the removal of the exiting access

The works thereafter shall be carried out in accordance with the approved details and before the hereby consented change of use is implemented.

Reason: Required to safeguard and enhance the character and amenity of the site and locality to avoid any irreversible damage to retained trees pursuant to section 197 of the Town and Country Planning Act 1990 and in accordance with the Local Plan Policies.

Restore field to be used for the construction compound to its current state

78.Before the agricultural field that will be the construction compound is prepared to be used as a construction compound a Method Statement shall be submitted to and approved in writing with the Local planning Authority that details how the agricultural field shall be fully restored to its current state so that it can be a viable agricultural field again. Within 6 months of the current West Suffolk Hospital being demolished or another timeframe otherwise agreed with the local planning Authority the field shall be restored to its current state in accordance with the approved Method Statement.

Reason: To ensure that the Special Landscape area is protected in accordance with policy DM13 of the Joint Development Management Policy Document 2015.

Relocate Railings and piers

79.Prior to any alteration to the existing junctions on Hardwick Lane commencing details of the new location for the existing wrought iron railings and piers shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include a timetable for their removal and relocation. The agreed relocation of the railings and piers shall be carried out in accordance with the agreed timetable and thereafter retained in the agreed location unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that these heritage assets are retained on site in accordance with Policy DM15 of the JDMPD

Ancillary uses

80.The ancillary restaurant and kitchen facilities on site shall not exceed 1,800sqm (GIA) unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order for ancillary facilities on site to not exceed a threshold which might potentially undermine the town centre or other local centres in accordance with DM35 of the Joint Development Management policies Document.

81.Concurrently with the submission for the Reserved Matter application for Appearance details of facing and roofing materials shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

Agree details of the waste bins

82.Concurrently with the submission of Reserved Matters for Layout, details of the areas to be provided for storage of Refuse/Recycling bins within the

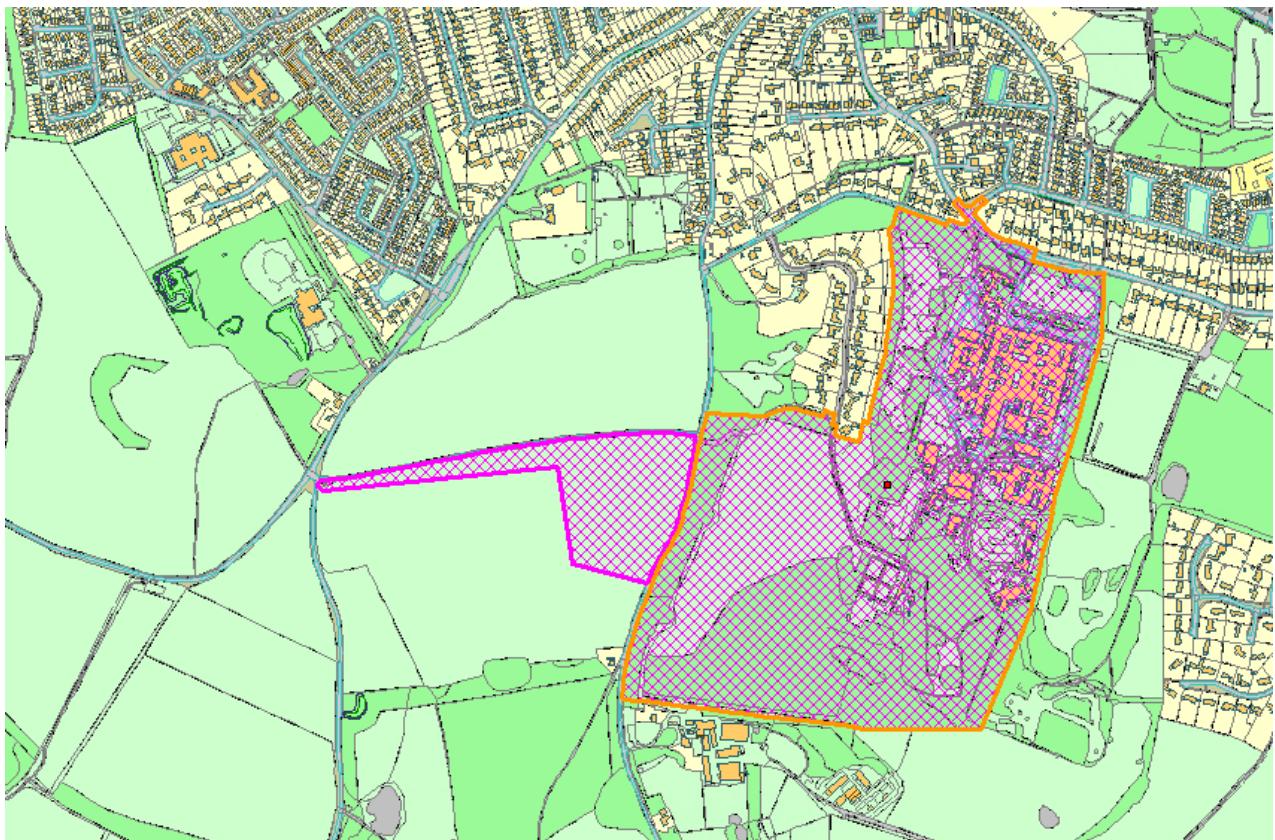
facilities management yard (as shown on page 82 of the approved Design and Access Statement) serving the new hospital shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be provided in their entirety before the development is brought into first use. No other area shall be used for the storage of Refuse/Recycling bins on the site unless the written approval of the Local Planning Authority is provided. The approved areas shall be retained thereafter and used for no other purpose.

Reason: To safeguard the character and appearance of the area, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

This page is intentionally left blank



DC/22/0593/HYB - Land At Hardwick Manor, Hardwick Lane, Bury St Edmunds,
IP33 2RD, Suffolk



This page is intentionally left blank



- 1 Primary Vehicle Access
(Signalised Junction)
- 2 Active Travel Route
- 3 Green Gateway
- 4 Main Arrival
- 5 Therapeutic Parkland Gardens
- 6 Internal Courtyards
- 7 Hardwick Manor and Walled Garden
- 8 'The Arboretum'
(No public access)
- 9 Proposed Southern Structural Landscaping
- 10 Proposed Northern Structural Landscaping
- 11 Existing Woodland Buffer
- 12 Landscape Attenuation Feature
- 13 Retained Parking (Not retained if the multi storey car park is built)
- 14 Retained Building
- 15 Potential Surface Parking
- 16 Controlled Access - Delivery and Maintenance Vehicle Only
- 17 Facilities Management Yard and Staff Parking
- 18 Temporary Construction Access
- During Construction Period Only (Access to be replanted after construction has finished)
- 19 Potential Multi Storey Car Park
- 20 Temporary Construction Compound
- 21 Access to Hardwick Manor House
- 22 Access to Hardwick Manor
House Alternate Option (Tree loss tbc if option is brought forward)
- 23 Public Bus Interchange

The use of this data by the recipient acts as an agreement of the following statements.
Do not use this data if you do not agree with any of the following statements:
Ryder Architecture has co-ordinated relevant information received from third parties, but
is not responsible for the content of the information received from others.
The controlled version of this drawing should be viewed in DWG or PDF format not DWG
or other formats. All prints of this drawing must be made in full colour.
Where this drawing has been based upon Ordnance Survey data, it has been
reproduced under the terms of Ryder Licence No. 100000144. Reproduction of this
drawing in whole or in part is prohibited without the prior permission of Ordnance Survey.
Do not scale the drawing. Use figured dimensions in all cases. Check all dimensions on
site. Report any discrepancies in writing to Ryder before proceeding.

Scale Bar (m)
0 10 25 50 150

N

P19 Updated in line with Castons comments for JWO SBL 10/11/22
Planning Committee

P18 Updated in line with Castons comments JWO SBL 07/11/22

P17 Updated in line with Castons comments for JTA JWO 05/10/22

P16 Updated in line with LPA comments post second round of public consultation ETS JTA 23/09/22

P15 Updated in line with structural landscape detailed drawings JTA JWO 04/09/22

P14 Updated in line with Castons comments for JTA EWI 29/07/22

P13 Updated in line with LPA comments for Planning Amendments ETS JTA 27/07/22

P12 Revised Red Line Boundary and Updated ASL JWO 13/07/22

P11 Updates to Red Line Boundary JPA RPO 23/03/22

P10 Updated to Reflect Change to Roundabout ASL SLE 15/03/22

P9 Outline Planning Application Issue JPA RPO 11/03/22

P8 Updated in Line With Amendments to Access and Circulation Strategy ASL SLE 13/01/22

P7 Updated in line with updated Access and Circulation Strategy. Drawing name amended. JTA SLE 17/12/21

P6 Updated in Line With Revise Access and Circulation Strategy ASL SLE 18/11/21

P5 Construction Compound Updates JPA RPO 11/11/21

P4 Construction of Veteran Tree Buffer Zone ASL SLE 08/11/21

P3 Indicative Issue After Comments JPA RPO 20/10/21

P2 Indicative Issue After Comments JPA RPO 18/10/21

P1 Draft Issue JPA RPO 15/10/21

Rev Description Drawn Checked Date

Suitability
For Information

Project
West Suffolk NHS Foundation Trust
West Suffolk Future System Hospital
Hardwick Lane, Bury St Edmunds, Suffolk, IP23 2QZ

Drawing
Proposed Illustrative Masterplan

Drawing Number
Project ID Originator Zone Level Type Role Number
WSH - RYD - MM - ZZ - DR - L - 1000

Project Number Scale at A1 Status Revision
10303-00 1 : 2000 S2 P19

This page is intentionally left blank