

Planning Statement

Land at Thorpe Wood,
Peterborough



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1. Introduction

Purpose of Statement

- 1.1 This Planning Statement has been prepared by ELG Planning on behalf of WW Medical Facilities Ltd in support of a full planning application for the erection of medical facility with provision of associated access, car parking and landscaping at Land at Thorpe Wood, Peterborough.
- 1.2 This supporting statement will seek to assess the development proposals through this submission in the context of the adopted development plan, national policy, and any other material considerations that may influence the determination of the application.
- 1.3 The following documents have also been submitted in support of this planning application:
 - Application Forms & Certificates;
 - Site Location Plan;
 - Plans & Elevations;
 - Landscaping scheme;
 - Design & Access Statement;
 - Planning Statement;
 - FRA & Drainage Strategy;
 - Preliminary Ecological Appraisal & Biodiversity Net Gain Assessment;
 - Phase 1 Contaminated Land Desk Study;
 - Noise Assessment;
 - Tree Survey & Arboricultural Impact Assessment;
 - Transport Assessment; and
 - Travel Plan.

Structure of Statement

1.4 This Planning Statement is structured as follows:

- Section 2 analyses the context of the site and outlines its planning history.
- Section 3 describes the development proposals.
- Section 4 Sets out the relevant planning policy context.
- Section 5 assesses the proposed development in the context of the adopted Development Plan for the area, as well as any other material considerations.
- Section 6 draws conclusions on the overall findings of the statement.

Requirement for the Proposals

- 1.5 The proposed development is a vital extension of existing services provided by Ramsay Health Care UK from their Fitzwilliam Hospital located approximately 700m to the north of the application site at Milton Way. The development is designed to provide important expansion of services to manage excessive demand in the local health system and support the local health economy in the reduction of elective care and early diagnosis and intervention of medical conditions.
- 1.6 Fitzwilliam Hospital is one of Cambridgeshire's leading independent hospitals. The existing hospital has 54 single rooms, and 1 twin-bedded room all with en-suite facilities. The service has reached capacity and essential expansion is urgently required for day case and community diagnostics providing on site MRI (Magnetic Resonance Imaging) and CT (Computed Tomography) scanners for early diagnostic and surgical intervention.
- 1.7 Establishing a satellite service for day case and diagnostic services will work in conjunction with the existing service to expand and modify the in-patient services from the Fitzwilliam Hospital to provide more bed capacity for more complex surgical procedures. Due to the existing site constraints this is only possible with a remote satellite service providing increased capacity and support to the existing day case services.

- 1.8 The proposal is to establish the following efficiencies and improvement to patient support:
- The existing Fitzwilliam Hospital – to deliver complex surgery (Orthopaedics, Spinal, Bariatrics & complex General Surgery)
 - New Day Case facility on this application site - dedicated facility to deliver General Surgery, Ophthalmology, Ear Nose & Throat therapies, Maxillo Facial, Urology, Pain Management and Gynaecology.
 - Providing Diagnostics is an important part of the service in addition to supporting the whole pathway service provision.
- 1.9 Due to increased demand and lack of capacity in the area this investment is seen as being important and intrinsic to reducing the continued increase in patient waiting times and deferred treatment and diagnostic services in the community.
- 1.10 As a participant in the NHS Choose and Book framework, Ramsay Health Care continues to support the local health community with strategic investment, capacity, and technology to become a leading service community and locality-based care provider.
- 1.11 Whilst NHS waiting lists are slowly falling, there are still an estimated 6.24 million patients waiting for treatment across England, and only 56.6% of patients are treated within the 18-week NHS standard timeframe. As part of the ambitious elective care reform plan, the NHS is aiming to return to the constitutional standard of treating 92% of patients within 18 weeks by March 2029, and to get to 65% by March 2026¹.
- 1.12 As part of the huge task of clearing the backlog, a partnership between the NHS and the independent medical sector was established in the year 2000, which established a policy framework committing the NHS and independent sector to work together to deliver high quality care for patients and value for money for taxpayers regardless of the type of provider organisation.
- 1.13 This partnership today is in an even stronger position. Patients have rights under the NHS Constitution to choose the provider of their care, including independent providers. The

¹ Source: <https://www.england.nhs.uk/2025/02/waiting-list-falls-as-nhs-staff-treated-record-numbers-last-year/>

NHS Provider Selection Regime sets out rules covering the award of contracts for provision of healthcare services, and the NHS Payment Scheme establishes clear commercial frameworks to ensure value for money. The independent sector now delivers significant amounts of elective NHS care – in 2024 the independent sector treated over 1 million NHS patients meaning they are no longer on waiting lists.

- 1.14 The government has committed to cutting NHS waiting times, ensuring NHS patients in England receive the care they need in line with the NHS Constitutional Standards. To deliver this goal, NHS England affirms its commitment to continue working in partnership with the independent sector to deliver high quality healthcare for NHS patients, and to enable increased independent sector elective activity to reduce waiting times, particularly in areas and specialties where this will have the greatest impact. Alongside, independent providers affirm their commitment to working as part of the tax-funded free at the point of use NHS in support of that goal and to work with the NHS to strengthen the overall healthcare system in England².

² <https://www.england.nhs.uk/long-read/elective-recovery-a-partnership-agreement-between-the-nhs-and-the-independent-sector/>

2. Site Context

Local Context

- 2.1 The site is located within the Thorpe Wood Business Park and is located adjacent to Worldwide House, which is a large office building surrounded by car parks and grassed area. To the east of the site is Thorpe Wood Business Park, to the north is the remainder of the grassed area and further car parking associated with Worldwide House and to the south are tennis courts and a car parking area associated with David Lloyd Health Club.
- 2.2 The site itself forms part of the grassed area and part of the unused car parking area, so it is in part, brownfield in nature. Access to the site is achieved via a private road from Thorpe Wood, which currently serves Worldwide House.



Figure 2.1: Site aerial

N.B Red line added by ELG to denote site location

- 2.3 Thorpe Wood is a well-established business park, located on the western edge of Peterborough, approximately 3.5km from Peterborough City Centre. The wider business park includes numerous office blocks, Peterborough Police Station, Thorpe Wood Care Home and the Peterborough Holiday Inn, as well as a golf course and driving range. To the west of the business park is the River Nene and Nene Park.

Planning History

- 2.4 The application site lies within an established Business Park, and the planning history of the surrounding area reflects this, but there is no planning history relating specifically to the application site itself.

Pre-application Discussions

- 2.5 Paragraph 39 of the National Planning Policy Framework (NPPF) recognises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 2.6 A pre-application enquiry for the proposed development was therefore submitted to Peterborough City Council in September 2024 (LPA Ref. PAMAJ/24/00053). The response was received on 10th December 2024 and summarised that:

“The proposal as submitted would conflict with Policy LP4, however Section 38(6) of the PCPA (2004) does require LPAs to consider any other material considerations and the Applicant is recommended to set out the detailed public benefits of the development in order to allow the LPA to consider the benefits of the development. This planning balance is also dependant on the other relevant technical material considerations which may come out during the course of the application.”

- 2.7 Clearly, the LPA have shown that the principle for the proposed form of development in this location could be supported. Nonetheless, the pre-application response identified a

number of other matters that would need to be satisfactorily addressed as part of any planning application, including design, amenity, ecology and highways. These considerations are fully addressed within this Planning Statement and the suite of technical information that accompanies the application submission.

2.8 Following receipt of the pre-application advice, the following changes have been made to the proposed site layout, to better improve the relationship with the adjacent Worldwide House and for highway safety improvements:

- The building has been turned around, so the patient access is located on the elevation closest to Worldwide House, and the “back of house” area is now located on the opposite side;
- The proposed access has been relocated to the western boundary of the site.

Pre-application Consultation

2.9 Paragraph 40 of the NPPF states that:

40. Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.”

2.10 In this instance, there is no requirement in law to engage with the local community prior to the planning application submission. However, as a matter of good practice, the applicant instructed ELG Planning to contact the neighbouring businesses located with the Thorpe Wood Business Park. As such, a covering letter explaining the proposals along with an indicative site layout plan were posted to the nearby properties (approximately 20

letters), and further information relating to the proposals were posted on ELG Planning's website³. The ward councillors for the area were also contacted.

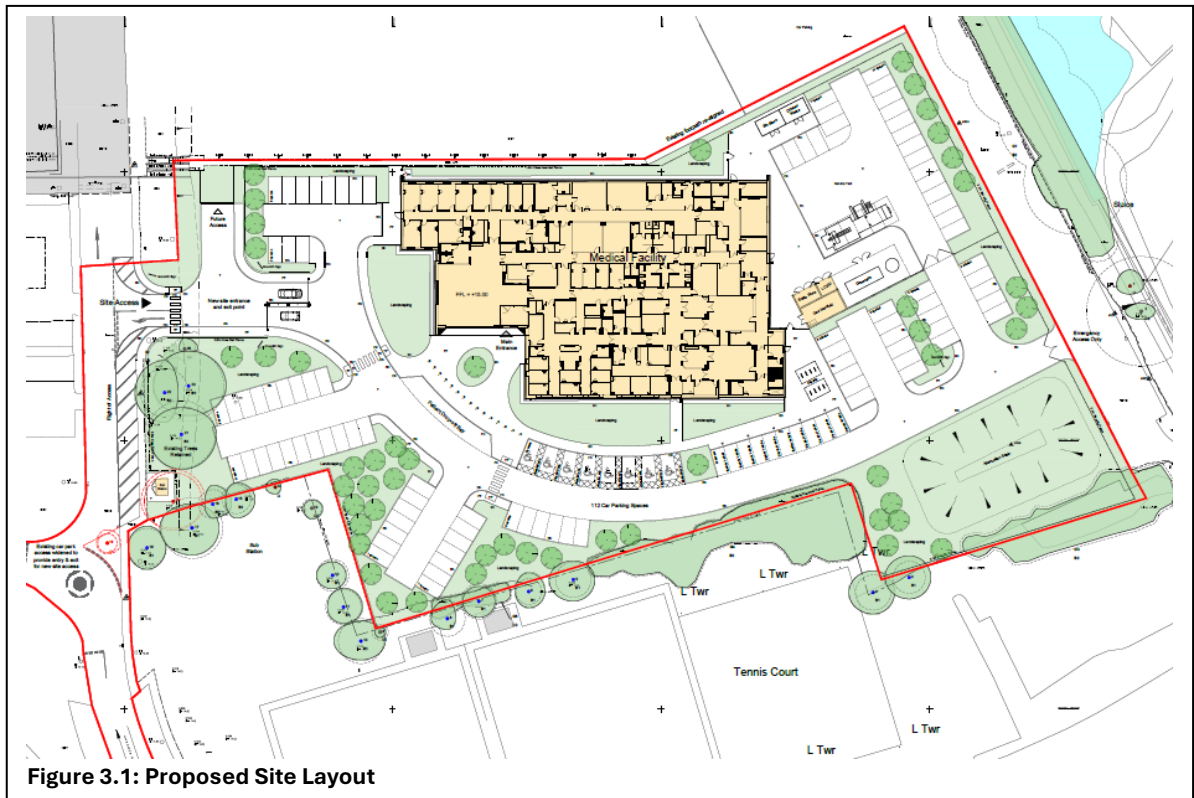
2.11 To date, no responses have been received.

³ <https://elgplanning.co.uk/projects/thorpe-wood-hospital-peterborough/>

3. Development Proposals

- 3.1 The proposed medical facility will be for day patients who require minor operations/procedures and will include an MRI and CT scanner. It is not proposed to include any overnight accommodation. However, other activities such as training, stocking, auditing, maintaining, and administration may take place outside normal operating times.
- 3.2 The facility will be operated by a independent healthcare provider, and it is envisaged it will be operated by 142 members of staff working on a shift basis. The hospital operator will be providing elective NHS, self-pay and insured contracted treatment, surgical, diagnostic and rehabilitation medial services. It will operate as a specialist day case unit within the local health economy to deliver a number of significant health benefits, including
- Collaboration with local health community to provide more local services;
 - Reducing delays to elective surgery, avoidable admissions & delayed transfers of care;
 - Offering community based diagnostic assessment and shorter efficient pathways of care for the patient; and
 - Reducing fundamental pressures on the local health care system
- 3.3 The proposed building will be single storey in height, with plant space at first floor, as shown on the submitted floor plans. The proposals will utilise the existing private access from Thorpe Wood which currently serves Worldwide House. A dedicated two-way access to the site will be created from the car park to the immediate south of Worldwide House, within improvements made to the car park, including the provision of a mini roundabout. A secondary access to the west of the application site will be controlled via barrier, and only used in an emergency situation, for example, if the main entrance is blocked. This secondary access has been provided in order to comply with the Health Technical Memoranda published by the Government.
- 3.4 A dedicated car park for the medical centre will be created to the south of the proposed new building, which will be provide space for 112 cars, including disabled parking

provision, electric vehicle charging bays and dedicated cycle parking. Areas of landscaping are located around the site. An extract of the site layout and proposed elevations are shown below.



4. Planning Policy Context

- 4.1 In line with Section 38 (6) of the Planning & Compulsory Purchase Act 2004, the statutory Development Plan continues to be the starting point when considering planning applications for the development or use of land, unless material considerations indicate otherwise.

Development Plan

- 4.2 The adopted Development Plan currently comprises the of the following documents:

- Peterborough Local Plan (Adopted 2019);
- Cambridgeshire and Peterborough Minerals and Waste Core Strategy (adopted 2011); and
- Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals DPD (adopted 2012).

- 4.3 As shown by the Proposals Map extract (below), the is entirely within a business park (Site Ref: B3 – Thorpe Wood).



Figure 4.1: Extract of Peterborough Policies Map

N.B. Red line denoting the broad location of the application site by ELG

4.4 The following policies contained in the Peterborough Local Plan are considered of most relevance to proposals:

- Policy LP1: Sustainable Development and the Creation of the UK's Environment Capital;
- Policy LP2: The Settlement Hierarchy and the Countryside;
- Policy LP4: Spatial Strategy for Employment, Skills and University Development;
- Policy LP7: Health and Wellbeing;
- Policy LP13: Transport;
- Policy LP14: Infrastructure to Support Growth;
- Policy LP16: Design and the Public Realm;
- Policy LP17: Amenity Provision;
- Policy LP19: The Historic Environment;
- Policy LP28: Biodiversity and Geological Conservation;
- Policy LP29: Trees
- Policy LP31: Renewable and Low Carbon Energy;
- Policy LP32: Flood Risk; and
- Policy LP33: Contamination

Policy LP4 - Spatial Strategy for Employment, Skills and University Development

4.5 Policy LP4 sets the strategy for growth of Peterborough's economy, and sets out that:

“The strategy is to promote and develop the Peterborough economy, offering a wide range of employment opportunities, with particular emphasis on growth of the environmental goods and services cluster, financial services, the advanced manufacturing sector, and other existing clusters in the city, building on existing strengths in 'knowledge-based' activities.

Employment development will be mainly focused in the city centre, elsewhere in the urban area (within General Employment Areas and Business Parks), and in urban extensions.”

- 4.6 In terms of Business Parks specifically, Policy LP4 states that:

“Within BPs listed below, and identified on the Policies Map, planning permission will be granted for development within Use Class B1. Other development in BPs will not be permitted unless ancillary to B1 use”.

Policy LP7 – Health and Wellbeing

- 4.7 Policy LP7 states that 23 proposals for new health care facilities should relate well to public transport services, walking and cycling routes and be easily accessible to all sectors of the community. Proposals which utilise opportunities for the multi-use and co-location of health facilities with other services and facilities, and thus co-ordinate local care and provide convenience for the community, will be particularly supported.
- 4.8 These policies will be referred to and discussed further in Section 5 of this Planning Statement.

Other Material Considerations

National Planning Policy Framework (NPPF)

- 4.9 The revised National Planning Policy Framework was published in December 2024 and sets out the government’s planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012 and its subsequent updates.
- 4.10 As stated at paragraph 7 & 8 of the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development, to which there are the following three objectives:

‘an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right

places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

- 4.11 Paragraph 10 of the NPPF confirms that at its heart is a presumption in favour of sustainable development, which for decision-taking means:

“approving development proposals that accord with the development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

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

- 4.12 Paragraph 101 of the NPPF sets out that:

“To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters,

*delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. **Significant weight** should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.”*

5. Planning Assessment

5.1 Having regard for the local planning policy context, and the requirements of the National Planning Policy Framework, the key planning considerations are considered to be as follows:

- Principle of Development;
- Highways/Car Parking;
- Design;
- Heritage;
- Trees & Landscaping;
- Ecology;
- Environmental Health & Amenity Considerations; and
- Flood Risk & Drainage

Principle of Development

5.2 In considering the principle of development in line with the adopted Peterborough Local Plan Policy LP4 (Spatial Strategy for Employment, Skills and University Development) states that the *“strategy is to promote and develop the Peterborough economy, offering a wide range of employment opportunities, with particular emphasis on growth of the environmental goods and services cluster, financial services, the advanced manufacturing sector, and other existing clusters in the city, building on existing strengths in 'knowledge-based' activities.”*

5.3 The development proposals will generate a total of around 90 high skilled new jobs and development proposals would clearly support the delivery of jobs as envisaged in Policy LP4. As such, there is support in principle on this basis.

5.4 Firstly, it is important to establish that the application site is located within an established Business Park known as “Thorpe Wood” (site reference BP3). Policy LP4 sets out that within Business Parks, planning permission will be granted for development within Use

Class B1, and other development in Business Park's will not be permitted unless ancillary to B1 Use.

- 5.5 However, it is critical to note that the changes to the Use Class Order, which now consists of the Town and Country Planning Use Classes (Amendment) (England) Regulations 2020, have significant influence on how Policy LP4 (and indeed other Local Plan policies) should be applied to this planning application and the changes to Use Class Order are a clear indication of the Government's intention to increase flexibility within employment uses.
- 5.6 In order to assess the proposals against Policy LP4, it is important to consider the precise operation of the medical facility. The proposed medical facility will be for day patients who require minor operations/procedures and will include an MRI and CT scanner. It is not proposed to include any overnight accommodation. This use previously fell within the former D1 Use Class, which has now been encompassed under Use Class E within the Town and Country Planning Use Classes (Amendment) (England) Regulations 2020. Crucially, it should be noted that Class E now also includes the former B1 Use Class – as such, the proposed medical facility use and the allocated use both fall within the same new (and more flexible) Use Class E.
- 5.7 In view of the above, the proposals will result in an employment generating use on a site allocated for safeguarded employment uses. Due to the use class order amendments, the proposed use and allocated use both fall under Use Class E and are therefore considered to be suitable for this employment area. Moreover, the proposals would not be resulting in the reduction of the type, quality and quantity of employment land. In fact, it would be protecting the intended use for the site for job creation and will prevent the potential loss of the site to another use that may not result in this number of high-quality jobs being created. The creation of the highly skilled jobs will, in turn, help support the economy in the local area. Given the highly skilled nature of the proposed medical use, it is arguably a higher quality and type of employment which will improve the diversity and resilience of the economy and employment provision.
- 5.8 Furthermore, since the pandemic the demand for “traditional” office space has drastically reduced as companies move towards a work from home or hybrid working model. As of September 2023, 60% of the adjacent Worldwide House was unoccupied,

and this is typical the situation across both Peterborough and the wider country. Moreover, the site and surrounding land has been marketed for office use since January 2019 with limited interest.

- 5.9 Pre-application discussions with the LPA indicated that they considered that the proposals would be contrary to Policy LP4, as the proposed use does not fall within E(g) specifically, however as set out above, the amendment to the Use Class order is a clear indication of the Government's intention to increase flexibility within employment uses, and to protect and grow the economy post-covid.
- 5.10 The above notwithstanding, section 38(6) of the Planning and Compulsory Act (2004) states that applications must be determined in accordance with the development plan, unless material considerations indicate otherwise, i.e. where there may be material considerations that demonstrate the wider public benefits of the proposals would outweigh any conflict.
- 5.11 The proposed medical facility will assist in providing an accessible facility catering for the medical needs of day patients who require minor operations and procedures. The hospital operator will be providing elective NHS, self-pay and insured contracted treatment, surgical, diagnostic and rehabilitation medical services. The medical facility will operate as a specialist day case unit within the local health economy to deliver a number of significant health benefits, including:
- Collaboration with local health community to provide more local services;
 - Reducing delays to elective surgery – the Fitzwilliam Hospital has experienced a sustained period of growth, particularly in the last 3 years, and the demand for services exceeds current operating capacity;
 - Offering community based diagnostic assessment and shorter, more efficient pathways of patient care;
 - Creation of highly skilled clinical jobs, as well as administrative jobs and apprenticeships, along with student nurse placement opportunities, working with Anglia Ruskin University.
- 5.12 As the proposals will provide a satellite service for day case and diagnostic services in conjunction with the Fitzwilliam Hospital, located approximately 700m to the north of the

application site on Milton Way, there is an operational need for the sites to be in relatively close proximity.

- 5.13 Paragraph 185 of the NPPF also sets out that significant weight should be place on the need to support economic growth and create the conditions in which business can invest, expand and adapt.
- 5.14 The pre-application response has also requested that the proposals demonstrate that the proposed use does not have a detrimental impact on the character of the Business Park. However, as indicated above, now that the former Use Class B1 is now encompassed under the same use class as the proposed medical facility (Use Class E), it is clear that the proposed use would be appropriate to the character of the area and would not cause an imbalance in the types of uses.
- 5.15 Moreover, there is already a multitude of uses existing within this relatively small Business Park, including David Lloyd Health Club (Use Class E), and Thorpe Wood Care Home (Use Class C2), indeed, part of the Business Park is allocated for C2 Use under Peterborough Local Plan Policy LP46 (site ref: LP46.5). It is therefore considered that the LPA have previously accepted that non-B1 Uses would be acceptable on the Business Park, and they would therefore not have a detrimental impact on the character of the Business Park.
- 5.16 Therefore, it is considered that the site and proposed medical facility is suitably located within the site which will not give rise to any negative impact upon the neighbouring businesses. Similarly, the operation of the proposed use is considered to be an appropriate for the adjacent businesses in terms of amenity.
- 5.17 In addition, it is prudent to highlight that, due to the characteristics of this type of medical facility development, suitable sites are usually only found on business parks with similar characteristics to this site at Thorpe Wood. Therefore, it is questionable as to where else a new medical facility could be proposed, other than an existing business park or employment area.
- 5.18 Furthermore, prior to progressing with this current site, the applicant undertook a site finding exercise in the area in order to consider appropriate available sites for the medical

facility, taking into consideration the operational link with Fitzwilliam Hospital. Two other sites of suitable size were considered by the applicant but were discounted for the following reasons.

Alternative Site	Reasons for being discounted
Thorpe Road, Peterborough	<ul style="list-style-type: none"> ▪ Unknown ground conditions; ▪ Site size restricted; ▪ Developable area compromised due to access; ▪ Potential high ecology value – biodiversity net gain risk
Silverhill, Hamptons	<ul style="list-style-type: none"> ▪ Poor ground conditions – significant piling required; ▪ Site size restricted; ▪ 3.4 miles away from Fitzwilliam Hospital – deemed too far for employees ▪ 4.9 miles away from Peterborough City Hospital - deemed too far for employees

- 5.19 To conclude, the proposals are considered to comply with the aims of Local Plan Policy LP4 as a use that will create a number of high-quality jobs, which will, in turn, help support the economy in the local area and the local health economy to deliver a number of significant health benefits. Furthermore, paragraph 101 of the NPPF sets out:

“To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.”

- 5.20 Whilst the proposals are for a independent healthcare facility, the partnership between the NHS and the independent medical sector was established in the year 2000, which established a policy framework committing the NHS and independent sector to work together to deliver high quality care for patients and value for money for taxpayers regardless of the type of provider organisation. This partnership today is in an even

stronger position. Patients have rights under the NHS Constitution to choose the provider of their care, including independent providers. As a participant in the NHS Choose and Book framework, Ramsay Health Care continues to support the local health community with strategic investment, capacity, and technology to become a leading service community and locality-based care provider.

- 5.21 The proposals therefore draw support from paragraph 101 of the NPPF, as they will assist delivery of the Government's ambitious elective care reform plan and the NHS is aiming to return to the constitutional standard of treating 92% of patients within 18 weeks by March 2029.
- 5.22 Taking all of the above into consideration, it is clear that significant public benefits arise from the proposals, which complies with the aims of the local plan as a whole in terms of job creation. It is therefore considered that the principle of development can be supported in this location, having regard to the National Planning Policy Framework.

Policy LP7 – Health and Wellbeing

- 5.23 Policy LP7 outlines support for new health infrastructure, including the provision of new or improved health facilities. Similarly, there is general support throughout the NPPF for the provision of identified local health and wellbeing needs, which is clearly supported by the Social Objective as outlined in paragraph 8 of the NPPF.
- 5.24 Policy LP7 sets out that proposals for new health care facilities should relate well to public transport services, walking and cycling routes and be easily accessible to all sectors of the community. There are bus stops within 500m of the proposed hospital entrance, which provide regular access (every 20 minutes between 5.30am and 7pm, then hourly until midnight) to Peterborough City Hospital, Peterborough City Centre, and surrounding areas.
- 5.25 The provision of a medical facility in this highly accessible location will therefore provide healthcare services in the area of Peterborough that will help increase capacity within the existing health care provision and hospitals in the area. The development is therefore considered to be conducive with the objectives of Policy LP7 and NPPF.

Highways/Car Parking

- 5.26 The application site is partially sited on the existing car park for Worldwide House, and the proposals will make use of the existing access from Thorpe Wood. A barrier-controlled access / egress will be provided on the western boundary of the site, to be accessed via the reconfiguration of the existing Worldwide House car park, whilst an egress-only junction for emergency vehicles will be provided on the eastern boundary of the site. To accommodate these changes, the existing parking layout at Worldwide House will be reconfigured. This reconfiguration will result in the loss of 153 parking spaces for Worldwide House, however as set out in greater detail the accompanying Transport Assessment, the loss of parking will not result in undue parking pressure across the wider site.
- 5.27 As part of the proposals, 112no. parking spaces for the medical centre will be provided, including 8no disabled parking bays close to the building entrance, and 10no electric vehicle charging bays, in addition to a patient drop off bay in the vicinity of the building entrance. Furthermore, visitor and staff cycle parking has been provided, in line with the Peterborough City Council parking standards.
- 5.28 In terms of wider transport network, paragraph 115 of the NPPF then specifies that when considering development proposals, it should be ensured that:
- Appropriate opportunities to promote sustainable transport modes can or have been taken up, given the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users; and
 - Any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 5.29 The above provisions notwithstanding, paragraph 116 of the NPPF is explicit 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, following mitigation, would be severe, taking in account all reasonable future scenarios.’*

5.30 Similarly, Peterborough Local Plan Policy LP13 requires all new development to ensure that appropriate provision is made for the transport needs that it will create, having specific regard to the policies and proposals of the latest Local Transport Plan (LTP) and Long Term Transport Strategy (LTTS). To assist in achieving the aims of LTTS and LTP, all new development proposals should, where appropriate, demonstrate that appropriate, proportionate and viable opportunities have been taken to:

- Reduce the need to travel, especially by car;
- Prioritise bus use over car use across the network;
- Seek to develop transport interchanges and travel hubs that provide facilities for transfer between modes of travel;
- Improve walking, cycle and public transport connections to district and local centres, travel hubs and key services, including links from the railway station and the River Nene;
- Make journeys on foot, cycle, public transport, car share or water the more attractive option over private car use, through the use of direct, legible and segregated routes;
- Provide an efficient and effective transport network that is well managed and maintained, using modern technology where appropriate, to allow for the safe and efficient movement of all modes of transport, together with quality information to improve knowledge of available transport options;
- Assist those with access and mobility difficulties;
- Promote improvements to travel security through improvements to lighting, CCTV and underpasses;
- Deliver quality cycle facilities at workplaces including secured and covered cycle parking, showering and changing facilities; and
- Seek to improve sustainable transport links to travel hubs from rural areas and improve walking and cycle links between villages.

5.31 To this end, this planning application is supported by a Transport Assessment and a Travel Plan prepared by TPS Consultants, which provides a full assessment of the impact upon the operation of the transport network in order to demonstrate that there are no highway grounds why the development proposals should not be granted planning consent.

- 5.32 This is provided in accordance with NPPF paragraph 108-110 and Policy 8 of the Core Strategy.

Design

- 5.33 Peterborough Local Plan Policy LP16 sets out that all development proposals are expected to positively contribute to the character and local distinctiveness of the area and create a sense of place.
- 5.34 The planning application is supported by a Design & Access Statement prepared by P+HS Architects which outlines the design philosophy of the building and concludes and provides full reasoning to justify that the development proposals fully comply with the requirements of the Local Plan Policy LP16 and NPPF with regards to design.

Heritage

- 5.35 The application site is located adjacent to Worldwide House, which is understood to have been constructed in 1977 as the headquarters of Thomas Cook travel agents, and has been identified as a non-designated heritage asset. The building was constructed in a modernist style (although in the post-modern period) and illustrates the key the key characteristics of the architectural philosophy of buildings in the modernist style.
- 5.36 The application is supported by a Heritage Impact Assessment prepared by ELG Heritage, which fully assess the impact of the proposals on the adjacent non-designated heritage asset and concludes:

The proposal is considered to have limited impacts on the setting of one NDHA and is not considered to fundamentally alter the significance or the wider setting or appreciation of this building. Which is considered to lie in its historic interest and architectural form and functionality, which will remain unaffected by the works.

The proposed development of the site as a medical facility to support and existing hospital facility will also bring a number of public benefits that will need to be weighed in the planning balance.

Paragraph 216 of the NPPF requires these impacts to be taken in account when determining the application. These limited impacts should therefore be weighed within the wider planning balance.”

- 5.37 In addition, as part of the application, consideration has also been given to any archaeological interest that the site may have and a geo-physical survey has been undertaken which found that much of the site has previously been disturbed and nothing was found in the areas which show a lower degree of disturbance. No further archaeological work is considered necessary.
- 5.38 The development proposals are therefore considered to comply Peterborough Local Plan Policy LP19, as well as chapter 16 of the NPPF.

Trees & Landscaping

- 5.39 Peterborough Local Plan LP29 considers that development proposals should be prepared based on the overriding principle that existing tree and woodland cover is maintained, improved and expanded.
- 5.40 The site lies within an existing building park, which benefits from good tree cover around its periphery and the proposals have been designed to retain as much as of the existing tree cover as feasible. The proposals will however result in the loss of a single category c tree to facilitate improvements to the existing access into the Worldwide House car park, as set out in the accompanying Arboricultural Impact Assessment.
- 5.41 The application is also supported by a detailed landscaping scheme which provides ## of new trees, along with hedgerows and shrub planting, to ensure that the application site maintains its existing leafy character.
- 5.42 It is therefore considered that the development proposals comply with Peterborough Local Plan Policy LP29 in this regard.

Ecology

- 5.43 Peterborough Local Plan Policy LP28 sets out that all development proposals should Deliver a net gain in biodiversity, where possible, by creating, restoring and enhancing habitats and enhancing them for the benefit of species. In addition, under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), all developments (subject to minor exclusions) are now required to demonstrate an uplift of 10% to result in more or better quality natural habitat than there was before development.
- 5.44 The application is accompanied by an Ecological Impact Assessment (EclA) assessment and statutory metric prepared by Antea Group which sets out how a biodiversity net gain will be achieved. As such, the proposals are compliant with Peterborough Local Plan Policy LP28.

Environmental Health & Amenity Considerations

- 5.45 Paragraphs 196 – 201 of the NPPF sets out the requirements for applicants to demonstrate the likely impact of the proposed development in terms of pollution (including air quality, noise and light pollution. It also highlights the requirement to assess ground conditions and any risks arising from land instability and contamination as well as requirement for remediation or mitigation works if required.
- 5.46 Peterborough Local Plan Policy LP17 sets out that new development should not result unacceptable impact on the amenity of existing occupiers of any nearby properties, including *inter alia* loss of privacy, loss of public green space, noise and/or vibration levels, and light pollution. Local Plan Policy LP17 also seeks to ensure that the amenity of future occupiers is also protected.
- 5.47 The application site is located within an established business park so there will be an existing level of commercial activity within the wider area, however the application is supported by a Noise Assessment which sets out recommendations to ensure that the proposals would not adversely affect the amenities of nearby residents by virtue of noise.

- 5.48 In terms of light pollution, the existing car park already benefits from lighting and the existing tennis courts are flood light, albeit they are covered in the winter months. It is therefore considered that the proposals would not contribute to light pollution in the area, given the established commercial use of the surrounding area.
- 5.49 In terms of potential for land contamination, a Phase 1 Desktop Assessment has been undertaken in order to understand the ground conditions of the site, and is submitted with this planning application.
- 5.50 In view of the above, the proposals will not result in an unacceptable impact in terms of noise, lighting, amenity and ground conditions, subject to the recommendations in supporting reports and information submitted with this application. The proposals are therefore in accordance with Section 15 of the NPPF and Peterborough Local Plan Policy LP17.

Flood Risk & Drainage

- 5.51 Peterborough Local Plan Policy LP32 confirms that development should adopt a sequential approach to flood risk management, taking into account the requirements of the NPPF. Paragraph 170 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). The application site is located in Flood Zone 1 and is therefore located at the lowest risk of flooding.
- 5.52 The application is supported by a Flood Risk Assessment and Drainage Strategy prepared by Hydrock. This confirms that the application site lies within Flood Zone 1, which is land assessed as having a less than 1 in 1000 annual probability of river or sea flooding and is the lowest flood risk zone identified by the Environment Agency. The surface water and foul drainage strategies are also set out within that document.
- 5.53 It is therefore considered that the proposals are in accordance with Local Plan Policy LP32 and paragraph 170 of the NPPF in this regard.

6. Conclusions

- 6.1 This Planning Statement has been prepared by ELG Planning on behalf of WW Medical Facilities Ltd in support of a full planning application for the erection of medical facility with provision of associated access, car parking and landscaping at land at Thorpe Wood Business Park, Peterborough,
- 6.2 The development proposals will deliver a modern purpose-built medical facility that will create a total of around 90 highly skilled jobs, which will support the delivery of jobs in Peterborough as envisaged in strategic Local Plan Policy LP4. Furthermore, the employment opportunities would be delivered on a site which is allocated for safeguarded employment uses under Local Plan Policy LP4. Due to the recent use class order amendments, both the proposed use and allocated use fall under Use Class E and are therefore considered to be suitable for this employment area. As such, the proposals are considered to comply the thrust and intent of Local Plan Policy LP4 and are therefore acceptable in principle.
- 6.3 Furthermore, there are a plethora of further public benefits associated with the proposals, as a participant in the NHS Choose and Book framework, Ramsay Health Care continues to support the local health community with strategic investment, capacity, and technology to become a leading service community and locality-based care provider, and the proposals will support the Government's the ambitious elective care reform plan, as well as the NHS aim to return to the constitutional standard of treating 92% of patients within 18 weeks by March 2029.
- 6.4 This Planning Statement and the supporting documents submitted with the application demonstrate that all technical matters have been addressed.
- 6.5 The development proposal accords with all of the relevant policies of the adopted Local Development Framework, and the principles of the NPPF. We therefore respectfully request that planning permission is granted at the very earliest opportunity.