

REGULATORY SERVICES COMMITTEE

12 November 2015

REPORT

Subject Heading:

St George's Hospital, Suttons Lane,
Hornchurch

P0321.15 The redevelopment of the St George's Hospital site inclusive of partial demolition and conversion of existing buildings to provide up to 290 dwellings on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works (received 09/03/15, revisions and additions received 22/07/15)

P0323.15 The redevelopment of the St Georges Hospital site inclusive of partial demolition of existing buildings to provide up to 3,000m² of new healthcare facilities on 1.74 ha of the wider site, together with the construction of a new vehicular access from Suttons Lane, associated car parking, landscape and infrastructure works. (received 09/03/15, revisions and additions received 22/07/15)

Ward

Hacton

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Policy context:

Local Development Framework
The London Plan
National Planning Policy Framework

Financial summary:

None

The subject matter of this report deals with the following Council Objectives

Havering will be clean and its environment will be cared for	[x]
People will be safe, in their homes and in the community	[x]
Residents will be proud to live in Havering	[x]

SUMMARY

This report considers two outline planning applications that have been received for the redevelopment of St. George's Hospital, Suttons Lane, Hornchurch. The site has been vacant since 2012 and is now surplus to requirements. Both applications are submitted with all matters reserved except for access although the proposals set development parameters and a scale threshold for development. An illustrative masterplan for the overall development of the site has also been submitted.

P0321.15 is for the partial demolition and redevelopment of 10 hectares of the St George's Hospital site to provide up to 290 dwellings including the retention and conversion of some of the existing buildings, new build residential housing and apartments, together with the creation and retention of areas of open space, a linear park and swale gardens and play space areas.

P0323.15 is for the redevelopment of 1.74 ha of the St. Georges Hospital site located to the north west of the site for the purposes of providing up to 3,000 sq m of new healthcare development together with a new vehicular access, plus car parking, infrastructure and landscaping.

The principal planning considerations arising from the proposals are the acceptability of the redevelopment of this Green Belt site in principle and the impact upon the Green Belt of the developments proposed, the impact of the proposals in terms of design, layout, scale and appearance, landscaping proposals, environmental implications, affordable housing, mix and tenure, parking and highway issues, the impact on local amenity and on community infrastructure.

Staff consider the proposal to be acceptable, subject to no contrary direction from the Mayor for London, the completion of a Section 106 legal agreement and conditions.

RECOMMENDATIONS

P0321.15 – Residential Redevelopment

That the proposal is unacceptable as it stands but would be acceptable subject to

A: No direction to the contrary from the Mayor for London (under the Town and Country Planning (Mayor of London) Order 2008); and

B: The Head of Regulatory Services being authorised to negotiate and agree a planning obligation under S106 of the Town and Country Planning Act 1990 (as amended), to secure the following:

- The provision on site of 15% of the units within the development as affordable housing (with a tenure split of 50% social rent to 50% intermediate housing) or alternatively 15% affordable provision on site (with a tenure split of 50% social rent to 50% intermediate housing) or greater than 15% overall affordable provision by providing suitable commuted sum for off-site provision of social rented housing
- Payment of £1,570,000 to the Council to be used for educational purposes
- Payment of £150,000 to the Council for improvements to Hornchurch Country Park
- Payment of £20,000 to Transport for London for improvements to cycle storage facilities at Hornchurch Station.
- To provide training and recruitment scheme for the local workforce during construction period.
- Landscaping and management of all public open space within the development in perpetuity in accordance with an agreed management scheme and the final delivery of public open space with unfettered access to the public prior to first occupation of no more than 250 dwellings.
- All contribution sums shall include interest to the due date of expenditure and all contribution sums shall be subject to indexation from the date of completion of the Section 106 agreement to the date of receipt by the Council
- The Developer/Owner shall pay the Council's reasonable legal costs in association with the preparation of the legal agreement, prior to the completion of the agreement, irrespective of whether the legal agreement is completed.
- The Developer/Owner shall pay the appropriate planning obligations monitoring fee prior to completion of the agreement.

The planning obligations recommended in this report have been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

Mayoral CIL

That the Committee notes that as an outline planning application the development proposed would be liable for the Mayor's Community Infrastructure Levy (CIL) which would be calculated and levied at Reserved Matters stage

Subject to recommendations A) and B) above that planning permission be granted subject to the following conditions, full details of which are included as Appendix 1:

Summary of Conditions

1. Outline - Reserved Matters to be Submitted
2. Outline - Time limit for submission of details
3. Complete Accordance with plans
4. Phasing
5. Reserved Matters for Each Phase
6. Reserved Matters Details for Each Phase
7. Accordance with Development parameters
8. Number of residential units
9. Footprint
10. Space Standards
11. Housing Mix
12. Details of materials
13. Boundary treatment
14. Lighting
15. Landscaping
16. Landscape Management Plan
17. Public Open Space Design
18. Protection of Preserved Trees
19. Obscure Glazing
20. Design Statement
21. Access Statement
22. Wheelchair Accessibility and Adaptable Homes
23. Sustainability and Energy Statement
24. Car Parking
25. Car Parking Reservation
26. Visibility Splays
27. Cycle storage
28. Highway Improvement Works
29. Electric Vehicle Charging Points
30. Fire Brigade Access
31. Detail of Fire Hydrants
32. Freight Strategy
33. Travel Plan
34. Surface Water Drainage
35. Foul and Surface Water Strategy

36. Surface Water Pollution Prevention
37. Water Efficiency
38. Internal Noise
39. Designing for Community Safety – Secured By Design
40. Air Quality Assessment
41. Refuse Storage and Segregation for Recycling
42. Archaeological Investigation
43. Species Surveys and Mitigation
44. Biodiversity Enhancement
45. Construction Environmental Management Plan
46. Hours of Construction
47. Wheel Washing
48. Contamination Assessment (1)
49. Contamination Assessment (2)
50. Gas Protection Measures
51. Inclusive Access and Wayfinding Strategy
52. Removal of Permitted Development Rights.

P0323.15 – Healthcare Facility

That the proposal is unacceptable as it stands but would be acceptable subject to

A: No direction to the contrary from the Mayor for London (under the Town and Country Planning (Mayor of London) Order 2008); and that the proposal be approved subject to the following conditions.

Mayoral CIL

That the Committee notes that as a planning application for a healthcare use the development proposed is not liable for the Mayor's Community Infrastructure Levy (CIL).

Subject to recommendations A) above that planning permission be granted subject to the following conditions, full details of which are included as Appendix 2:

Summary of Conditions

1. Outline - Reserved Matters to be Submitted
2. Outline - Time limit for submission of details
3. Complete Accordance with plans
4. Accordance with Development parameters
5. Footprint
6. Details of materials
7. Boundary treatment
8. Lighting
9. Landscaping
10. Landscape Management Plan
11. Protection of Preserved Trees

12. Design Statement
13. Access Statement
14. Sustainability and Energy Statement
15. Car Parking
16. Visibility Splays
17. Cycle storage
18. Highway Improvement Works
19. Electric Vehicle Charging Points
20. Fire Brigade Access
21. Detail of Fire Hydrants
22. Freight Strategy
23. Travel Plan
24. Surface Water Drainage
25. Foul and Surface Water Strategy
26. Surface Water Pollution Prevention
27. New Plant Noise
28. Designing for Community Safety – Secured By Design
29. Air Quality Assessment
30. Refuse Storage and Segregation for Recycling
31. Archaeological Investigation
32. Species Surveys and Mitigation
33. Biodiversity Enhancement
34. Construction Environmental Management Plan
35. Hours of Construction
36. Wheel Washing
37. Contamination Assessment (1)
38. Contamination Assessment (2)
39. Gas Protection Measures
40. Inclusive Access and Wayfinding Strategy
41. Restriction of Use

REPORT DETAIL

1. **Background**

- 1.1 These outline planning applications have been submitted by NHS Property Services and are an important part of the lengthy procedure involved in the development of new health care facilities and the disposal of surplus NHS land and property. The case for the redevelopment of the St George's site has been in process since 2012/13 and was finally approved by NHS England in 2014.
- 1.2 Havering Clinical Commissioning Group (CCG) now needs to develop a detailed business case for the development of a new health facility and securing an outline planning permission is an intrinsic and important part

of that process. In developing the business case the CCG has looked at the overall size of the plot required to develop a health centre and the site area identified is the maximum required.

- 1.3 The remaining majority of the St George's Hospital site has been declared surplus to NHS requirements. Outline planning permission is therefore being sought for residential redevelopment of the surplus land and buildings prior to marketing the site. By developing a set of parameters and guidelines for the site's future development an outline planning permission would help ensure that the sale of the surplus site and buildings achieves "best value". The receipt from any sale would be recycled indirectly back into health service facilities so could be viewed generically as contributing towards the development of healthcare services in the Borough and on this site.

2. **Site Description**

- 2.1 The site is located on the eastern side of Suttons Lane some 800m south of Hornchurch underground station with Hornchurch town centre a similar distance again north of the station.
- 2.2 The site is bound to the north by residential properties in Hacton Drive which back onto the site and to the west by Suttons Lane with houses facing the site across the road. To the east and south are open areas comprising the Ingrebourne River Valley and Hornchurch Country Park. The site is broadly rectangular with an overall area of 11.74 ha (29 acres). The site is relatively flat but does fall from west to east and north to south.
- 2.3 The site lies within the Green Belt and is identified as Major Developed Site within the Green Belt in the LDF. The Ingrebourne Valley to the east and Hornchurch Country Park to the south are identified as Metropolitan and Borough Sites of Importance for Nature Conservation (SINC) respectively. 800m to the south of the site the Ingrebourne Valley is identified as a Site of Special Scientific Interest (SSSI).
- 2.4 There are two existing vehicular access points to the site, both from the west via Suttons Lane. The main access is broadly located in the centre of the western boundary with the second access point located towards the south-west corner.
- 2.5 The site is characterised by large red brick institutional blocks set within their own or shared landscape comprising of lawns, parking, hard standing roads and paths, and groups of trees. The blocks are predominantly two storey but with high ceilings and steeply pitched roofs and are typical of the inter war institutional style. A group of buildings towards the north east of the site are more utilitarian plant related including plant and power rooms, laundry, workshops, garages and fuel tanks. A long single storey corridor links many of the former ward buildings on the site. .

3. **Description of Proposals**

3.1 **Form of Applications**

3.1.1 The planning applications were submitted simultaneously and are both submitted in outline with all matters reserved save for access. The documentation is common to both applications and includes the following:

- Planning Statement
- Design and Access Statement
- Archaeological Desk Based Assessment
- Heritage Assessment and Historical Background
- Arboricultural report
- Baseline and Phase 2 Ecological Surveys and Assessment
- Transport Assessment
- Flood Risk Assessment
- Energy Strategy
- Sustainability Strategy
- Geoenvironmental and Geotechnical Investigation and Risk Assessment
- Affordable Housing Statement
- Statement of Community Involvement

3.1.2 Separate drawings and parameter plans accompany each application with a common illustrative masterplan which shows one way in which the site could be developed and upon which the various assessments have been based.

3.2 **P0321.15 – Residential Redevelopment**

3.2.1 The proposal is an outline application for the redevelopment of 10 ha of the St. Georges hospital site for residential purposes including the retention and conversion of some of the existing buildings, new build residential housing and apartments, together with the creation and retention of areas of open space, a linear park and swale gardens and play space areas.

3.2.2 The site has a frontage of 335m to Suttons Lane, a depth of 242m at its southern end and a maximum of 280m towards the northern end. The site also has a 96m boundary with the rear of No's 46 to 66 Hacton Drive where the site extends behind the area identified for healthcare development.

3.2.3 The physical development parameters of the proposal are linked to a number of plans. These identify, development parcels and their function, a construction and phasing strategy, a demolition plan, strategic open space cycle/pedestrian/vehicular movement, building heights and density. An illustrative Masterplan demonstrates one way in which the site might be developed in line with the parameter plans.

3.2.4 The quantum of development is also defined and in land use terms the scheme will provide for:

- Not more than 290 residential units;
- The retention, refurbishment and conversion of 6 key buildings along the frontage of the site (119/121 Suttons Lane, the Willows building, Gatehouse, Admin and Ingrebourne buildings and the northern ward block) to provide 87 apartments and houses.
- New build development of 203 dwellings.
- A predominant height of two to three storeys with no more than 3 locations identified for 4 storey development.
- Developed parcels not to exceed 6.54 ha.
- New housing laid out on a predominantly perimeter block arrangement except where adjacent to or backing onto the healthcare site or properties in Hacton Drive.
- An indicative masterplan mix of housing which would deliver:
 - 13% 1 bed apartments
 - 28% 2 bed apartments
 - 4% 3 bed apartments
 - 12% 2 bed houses
 - 25% 3 bed houses
 - 14% 4 bed houses
 - 4% 5 bed houses
- 15% of units offered as affordable housing.
- Car parking at a rate of 1.7 per unit overall.

3.2.5 A landscape strategy is defined in the Design and Access Statement which has been formulated in response to the existing features of the site and would aim to protect key views, mitigate the impact of the development, retain and protect key tree groups, individual specimens and boundary vegetation, enhance the ecology of the site through the creation of new habitats including SuDs (Sustainable Urban Drainage Systems), attractive high quality open spaces and play opportunities. A hierarchy of strategic open space is identified in plan TP110.

3.2.6 The development of the site would accord with the general principles set in plan TP104 - Zone Uses and Access, together with TP107 – Cycle/Pedestrian Vehicular Movement which demonstrate how the site would be linked and accessed via primary and secondary roads, pedestrian and cycle routes. The intention is to base the redevelopment of the site around the retention of the original well spaced pattern of healthcare development along Suttons Lane and to enhance the long vistas through the site to the Ingrebourne Valley beyond. Much of the new development would be set behind the retained buildings framing the long vistas and open spaces.

3.2.7 The proposals include Sustainable Urban Drainage measures incorporated into the open spaces and comprise a combination of source control SuDS, swales and attenuation basins.

3.3. **P0323.15 – Healthcare Facility**

3.3.1 The proposal is an outline application for the redevelopment of 1.74 ha of the St. Georges Hospital site located to the north west of the site for the purposes of providing up to 3,000 sq m of new healthcare development together with a new vehicular access, plus car parking, infrastructure and landscaping. The site has frontage of 89m to Suttons Lane and an overall depth of 186m. The northern boundary of the site is contiguous with the flank boundary of 111 Suttons Lane and the rear boundary of No's 2 to 44 Hacton Drive

3.3.2 The illustrative layout for the healthcare development provides a design that embodies the principles that would be adhered to at reserved matters stage. The elements comprise:

- 2 to 3 storeys in height
- Building to be located in the south western portion of the site with a building line no closer to Suttons Lane than any of the existing larger hospital buildings.
- Incorporates provision for the location of a portable MRI unit.
- Provision of 50 dedicated parking spaces.
- Existing and enhanced buffer landscaping to the northern and eastern boundaries.
- Linear landscaped area along Suttons Lane.

3.3.3 The services that would be provided in the healthcare development cannot as yet be confirmed. However, it is indicated that it would include facilities for an extended primary care centre, a centre for a local integrated care team and for secondary care community services, day assessment and diagnostics including imaging and phlebotomy, flexible space for education and a location for voluntary and community sector providers.

4. **History**

4.1 St. George's Hospital was opened in 1939 as Suttons Institution and was brought into use during World War II to house airmen at RAF Hornchurch. In 1948 it was renamed St. George's when it became part of the NHS.

4.2 The site has an extensive planning history but there have not been any recent planning applications directly relevant to the scheme proposals. Applications in recent years have related mainly to changing access arrangements, telecommunications masts etc.

5. Consultation/Representations

- 5.1 The proposals have been advertised as a major development by the display of site notices and by an advertisement in the local press. A copy of the planning application has also been available in Hornchurch Library. A total of 446 individual properties were notified directly of the proposals. Both applications were referable to the Mayor of London as they are located in the Green Belt and involve the construction of a building/s with a floorspace of more than 1,000 square metres or the change of use of such building, and because the development includes the provision of more than 150 dwellings.

Representations

- 5.2 A total of 13 letters of representation have been received, 9 of which raise objections and make comments in relation to the residential proposals with 4 raising some concerns about the healthcare proposals. Several of the letters are generally supportive of the healthcare proposals. The following matters are raised in summary:

P0321.15 – Residential

- Increased pressure on local services, schools, Dr's etc;
- Increased traffic on a road that is already busy, widening of road and right turn lane may increase speed and make road more dangerous;
- Increased pollution from traffic plus noise and dust from construction;
- Additional parking problems;
- Fear that once sold the site would be developed at a higher density than shown on current plans, that frontage buildings may not be retained and that open area at the front of the site may be developed.
- Height and density of development should be no greater than that which exists, so there should be nothing higher than 3 storey.
- Any development should have adequate parking, gardens and green space should be retained;
- Site is unsuitable for housing, no affordable housing should be incorporated;
- Future maintenance of landscaping needs to be ensured;
- Site would be better developed for a retirement village;

P0323.15 – Healthcare

- Privacy and amenity of neighbours in Hacton Drive should be protected;
- No details of the facilities to be provided or the hours or days of operation have been provided;
- Additional traffic will result.

General

- Pre-application consultation was inadequate and poorly carried out;

- A request has been made for the inclusion of a pre-school nursery.

Consultations

Environment Agency – Requested conditions requiring a detailed water surface drainage scheme and a scheme to install appropriate surface water pollution prevention and treatment measures.

Essex and Suffolk Water – No objections.

Essex Wildlife Trust – The Trust are building a visitor centre adjacent to the site. The new housing will benefit from the proximity of Hornchurch Country Park. The visitor centre will provide improved facilities for park users and visitors but car parking will be insufficient in the future. EWT are seeking a developer contribution for car parking improvements.

Greater London Authority – The Mayor considers that the application does not comply with the London Plan.

The proposed land use for provision of a healthcare facility and residential use is supported subject to further review of the master plan and assurance of the securing of design quality. The footprint and floor space should be secured as a maxima.

There is a preference for a mix which allows for a greater number of large 3 bed+ properties. A condition to secure the housing mix is requested.

The affordable housing offer of 10% is considered to be low and the viability assessment should be independently assessed and the findings shared with the GLA.

There are areas of the spatial development approach which require some adjustment to ensure design quality throughout. The illustrative parameter plans need to be refined so that they can be secured by condition. The applicant is also required to include the additional GLA development principles and finalised parameter plans, plot guidance and design coding/development principles should be agreed before Stage 2 – together with appropriately worded condition/s.

The applicant has not provided a play strategy or completed an assessment of child yield using the Mayor's *Shaping Neighbourhoods : Play and Recreation SPG (2012)*. The applicant should undertake this calculation work and the findings should relate to its play strategy.

The applicant should provide assurances over the following issues in order to ensure that inclusive access is properly addressed through future reserved matters application.

- Site levels and how easy access is secured across the site and at all crossing and transition points should be shown on the parameter plan

- Blue Badge parking spaces for residents and visitors should be located as close as possible to residential entrances.
- 100% of homes should meet Lifetime Homes standards and 10% of homes should be designed to be wheelchair accessible or easily adapted for occupation by a wheelchair user. Wheelchair homes should be distributed across the tenure and unit sizes.

No reserved matters application should be submitted until an inclusive Access Strategy and a Wayfinding Strategy has been submitted to and approved by the LPA.

A number of matters are highlighted in respect of energy, heating and carbon saving and a condition is requested requiring the development to achieve a 35% carbon reduction against a Part L 2013 Building Regulations development.

Cycle parking should be brought into line with the current London Plan requirements. Further trip information is required in order to identify if any capacity issues will be likely. An assessment of local bus stops should be undertaken to determine whether they comply with TfL's Accessible Bus Stop Design guidance. The level of car parking proposed is likely to be out of accordance with the London Plan and a plan showing how the parking spaces are to be allocated should be provided.

Historic England – The submitted Archaeological Assessment identifies the existence of prehistoric settlement features across the application site. The surviving buildings and structures are themselves of historic and in some parts of architectural significance. Conditions are suggested to ensure that the archaeological significance of the site is properly investigated and recorded together with an appropriate recording of historic buildings on the site prior to any alterations or demolition taking place.

LBH Education – All Local Authorities including Havering have a statutory duty to ensure that there are enough school places available in the borough to accommodate all children who live in the borough and might require one. The increase in demand for school places has meant that in some areas of Havering the demand for places is higher than the number of places available.

The expected child yield generated from the 290 proposed units will be as follows:

Total expected primary child yield is 90 primary children

Total expected secondary child yield is 60 secondary children

Total expected early years child yield is 32 children (age 0 to 5)

The latest authority's school roll projections for primary pupils show that currently and for the immediate future there is a great demand for school places. Therefore any additional children will put more pressure on the demand for schools places in the local area. Despite creating additional school places in recent years there is very little surplus operating capacity and the expected 90 primary children generated by this development, will create additional pressure on school places in the near future.

The secondary school roll is projected to increase and by 2019/20 there will be a deficit of secondary school places. Therefore any additional secondary school children generated from this development will put a greater pressure on the demand for secondary school places.

LBH Energy – Recommends conditions that the final scheme must comply with the details shown within the Energy Assessment and Sustainability Strategy and that evidence of the BREEAM and/or Code for Sustainable Homes rating (or its equivalent) must be provided

LBH Environmental Health – Conditions requested in respect of land contamination, gas protection, demolition method statement, construction method statement and levels of noise insulation

LBH Highways – No objections subject to the imposition of conditions and informatives related to pedestrian visibility splays, vehicle access, highway improvement works, wheel cleaning and matters related to changes to the public highway and temporary use of the highway.

LBH Property Services – Expresses concern that if access points are or could be created from the application site to adjacent land that additional pressure for development of areas to the north and east of the development site will occur. Particular concern is raised about indicative points of access onto 3rd party land which will encourage unauthorised access and place greater pressure for development and unauthorised use of the Green Belt.

LBH – Flooding and Drainage – Outline drainage and SuDS. Proposals are acceptable and achieve good run-off rates.

London Fire Brigade – Advise that it will be necessary to install 14 new hydrants to cover the development area. A drawing showing indicative locations was supplied.

LFEP A – Advice given that the development needs to comply with the relevant sections of Approved Document B of the Building Regulations

Met Police SBD – General comments related to the principles and practices of Secured by Design which should be incorporated into future reserved matters applications. Recommends that a condition and informative be attached to any permission.

Natural England – Objects to the development on the grounds that the application, as submitted, is likely to damage or destroy the interest features for which the Ingrebourne Marshes SSSI, (approximately 573m away at its closest point) has been notified. Further information is requested regarding surface water and that all waste water will be managed so that there is no likelihood of damage to the interest features of the SSSI. The recreational impacts of the development on the SSSI arising in particular from recreational disturbance and cat predation should be assessed. The introduction of roosting and nesting opportunities for bats and birds through the installation of appropriate boxes is encouraged.

Thames Water – Request a Grampian style condition in respect of a drainage strategy for any on and/or off site drainage works to be approved in advance of any new discharge from the site. The foul water strategy needs to identify the current and proposed points of connection into the public sewer system as well as current and proposed peak flow rates. Advice is also given about the proximity of public sewers to the site.

6. **Relevant Policy**

6.1 Policies CP1 (Housing Supply); CP2 (Sustainable Communities); CP7 (Recreation and Leisure); CP8 (Community Facilities); CP9 (Reducing the need to travel); CP10 (Sustainable Transport); CP14 (Green Belt); CP15 (Environmental Management); CP16 (Biodiversity and Geodiversity); CP17 (Design); CP18 (Heritage); DC2 (Housing Mix and Density); DC3 (Housing Design and Layout); DC4 (Conversions to Residential and Subdivision of Residential Uses); DC6 (Affordable Housing); DC7 (Lifetime Homes and Mobility Housing); DC20 (Access to Recreation and Leisure Including Open Space); DC21 (Major Developments and Open Space, Recreation and Leisure Activities); DC26 (Location of Community Facilities); DC27 (Provision of Community Facilities); DC32 (The Road Network); DC33 (Car Parking); DC34 (Walking); DC35 (Cycling); DC36 (Servicing); DC40 (Waste Recycling); DC45 (Appropriate Development in the Green Belt); DC46 (Major Developed Sites); DC48 (Flood Risk); DC49 (Sustainable Design and Construction); DC50 (Renewable Energy); DC51 (Water Supply, Drainage and Quality); DC52 (Air Quality); DC53 (Contaminated Land); DC55 (Noise); DC59 (Biodiversity in New Developments); DC60 (Trees and Woodland); DC61 (Urban Design); DC62 (Access); DC63 (Delivering Safer Places); DC67 (Buildings of Heritage Interest); DC70 Archaeology and Ancient Monuments); DC72 (Planning Obligations) of the Local Development Framework (LDF) Core Strategy and Development Control Policies Development Plan Document (DPD) are material considerations.

6.2 In addition, the Planning Obligations SPD, Residential Design Supplementary Planning Document (SPD), Designing Safer Places SPD, Protecting and Enhancing the Borough's Biodiversity SPD and Sustainable Design and Construction SPD are also material considerations.

6.3 Policies 3.1 (Ensuring equal life chances for all); 3.2 (Improving health and addressing health inequalities); 3.3 (Increasing housing supply), 3.4 (Optimising housing potential); 3.5 (Quality and design of housing developments), 3.6 (Children’s play facilities), 3.7 (Large residential developments); 3.8 (Housing choice), 3.9 (Mixed and balanced communities), 3.10 (Definition of affordable housing), 3.11 (Affordable housing targets), 3.12 (Negotiating affordable housing), 3.13 (Affordable housing thresholds); 3.16 (Protection and enhancement of social infrastructure); 3.17 (Health and social care facilities); 5.2 (Minimising carbon dioxide emissions), 5.3 (Sustainable design and construction), 5.6 (Decentralised energy in development proposals); 5.7 (Renewable energy); 5.10 (Urban greening); 5.11 (Green roofs and development site environs); 5.12 (Flood risk management); 5.13 (sustainable drainage), 5.21 (Contaminated land); 6.2 (Providing public transport capacity and safeguarding land for transport); 6.3 (Assessing effects of development on transport capacity); 6.9 (cycling), 6.10 (walking), 6.13 (parking), 7.1 (Lifetime neighbourhoods); 7.2 (An inclusive environment); 7.3 (designing out crime), 7.4 (local character), 7.5 (Public realm); 7.6 (architecture), 7.8 (Heritage assets and archaeology); 7.14 (improving air quality), 7.15 (reducing noise and enhancing soundscapes), 7.16 (Green Belts); 7.19 (biodiversity and access to nature); 7.21 (Trees and woodlands) and 8.2 (planning obligations) of the London Plan (LP) and the provisions of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) are also material considerations.

7. **Staff Comments**

7.0 **Introduction**

7.0.1 These applications are seeking Outline planning permission for the redevelopment of the St. George’s Hospital site in Hornchurch. With the exception of the points of access from Suttons Lane, the scope of the applications seek to establish the principle of the developments proposed and the broad parameters to be followed by subsequent submissions of reserved matters applications. Matters of detail are therefore not being determined at this stage, but rather the broad principles including the maximum number of dwellings, which existing buildings are to be retained, the maximum height of development, housing mix, build and no build zones, design ethos, playspace quantum, parking regime, sustainability and Sustainable Urban Drainage (SuDS) features to be incorporated.

7.1 **Principle of Development**

7.1.1 LDF Policy DC46 is specific to the application site, identifying the St. George’s Hospital site as a Major Developed Site in the Green Belt where Green Belt assessment criteria should be used and where “in the event of complete or partial redevelopment the Council will seek proposals for residential or community use, subject to relevant policies in the Plan.” The concept of designated major development sites promoted by PPG2 (Green Belts) has been removed by the NPPF. However, para 89 of the

NPPF identifies that one of the exceptions to the general presumption against inappropriate development in the Green Belt is in relation to “partial or complete redevelopment of previously developed sites....which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.” LDF Policy DC46 can therefore be upheld as remaining in line with National Policy on the Green Belt.

- 7.1.2 LP Policy 3.16 (B) indicates support for high quality social infrastructure proposals and that the suitability of redundant social infrastructure premises for other forms of social infrastructure provision should be assessed before alternative developments are considered. Similarly LP Policy 3.17 indicates support for high quality health and social care facilities in areas of identified need. The site has been declared surplus to requirements by NHS England and a strategic outline case has been made for the redevelopment of part of the site for a new health facility. The availability of the site for partial redevelopment to provide a health care facility is therefore in line with London Plan policies 3.16 (B) and 3.17 and furthermore such use is consistent with the existing lawful use of the site.
- 7.1.3 Policies DC26 of the LDF relates to the provision of new community facilities setting a number of criteria (accessibility, impact upon character and amenity, parking availability and highway impact and flexibility of the building) which need to be satisfied before planning permission should be granted.
- 7.1.4 Policy DC27 relates to the redevelopment of community facilities and requires that it should be demonstrated that there is no longer a need for the facility and that suitable alternative provision should be made.
- 7.1.5 As outlined earlier in this report, St. George’s Hospital is now vacant and redundant as a healthcare facility with the facilities it previously provided absorbed into the wider NHS. The larger part of the site (85%) has been declared surplus to requirements by the NHS whilst the other 15% is to be reused for healthcare purposes. The case for the redevelopment of the St George’s site was approved by NHS England in 2014. The case for the development of a new health facility is on-going and the determining of the current planning applications is an important and intrinsic part of that process. Staff are satisfied that the location of the proposed healthcare facility satisfies all of the necessary criteria of DC26 and the principle of the renewed healthcare provision on the site is supported.
- 7.1.6 Accordingly, subject to meeting the criteria for suitable Green Belt development set out in the NPPF/NPPG and the relevant policies of the LDF where these have not been effectively superseded, the principle of the redevelopment of the site for residential and health care purposes is supported.

7.2 Green Belt Considerations

7.2.1 The application site is located within the Metropolitan Green Belt where great importance is attached at local, regional and national level to the original aims of preventing urban sprawl by keeping land permanently open and protecting the essential characteristics of openness and permanence.

7.2.2 The NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Paragraphs 87 and 88 state:

“as with previous Green Belt policy, inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. “Very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

7.2.3 However, as set out in the previous section, the partial or complete redevelopment of previously developed sites could be considered appropriate development in the Green Belt if it would not have a greater impact upon the openness of the Green Belt and does not undermine the purpose of the site’s inclusion in the Green Belt. On the other hand, if it were to be concluded that the proposals would have a greater impact on openness or result in some other harm to the purpose of including the site in the Green Belt, then very special circumstances would have to be demonstrated which clearly outweighed such harm. The impact upon the openness of the site, implicitly intertwined with the visual impact of the proposals, is therefore a key consideration to determining the acceptability of the proposals in Green Belt terms.

7.2.4 The applicant has undertaken an assessment of the impact of the development on openness based upon the built form within the Green Belt – the quantum (footprint and volume) and spread of development (development envelope), comparing the development proposals against the existing hospital layout, its buildings and hard surfaces. The masterplan approach with parameter plans defining matters such as development envelopes, building heights, retained buildings, open space and movement is considered to lend itself to analysis of this nature. However, members should be aware that there is no definition of “openness” contained within the NPPF or NPPG, nor are there any criteria within policy or guidance relating to the assessment of a development upon it. A degree of subjective judgement therefore remains however well quantified the comparisons are.

Impact on Openness

- 7.2.5 The application site is characterised predominantly by large institutional style buildings with extensive areas of hard surface, set within a generally grassed and landscaped setting. The redevelopment proposals are contained wholly within the site boundaries and do not propose any significant material spread of development beyond the existing development envelope. There are some marginal relocations of development, but overall by removing and greening areas of existing hard surface, the edge of the developed site would be softened. This is consistent with the Green Belt objective of checking the unrestricted sprawl of the built up area.
- 7.2.6 In terms of objective measurement the proposals demonstrate that the existing and proposed forms of development would provide a similar spread, plan form and layout, but that the proposed amount of built footprint would be reduced by approximately 10%. The proposed scheme would retain the buildings on the frontage of the site but remove a number of the large institutional buildings, re-providing their volume over a number of smaller buildings whilst maintaining the historic block layout of the site. Notably the long corridor run which traverses much of the site and the extensive parking area, fencing and railings along the Suttons Lane frontage of the site would be removed, both of which would contribute positively to the openness of the site.
- 7.2.7 In terms of height the existing buildings are predominantly two storeys high with a number of single storey structures and some notable taller structures, chimneys to the boiler house, which are significantly taller. However, as is often found with inter war institutional buildings, many of the existing two storey healthcare buildings have eaves and ridge heights which are equivalent to modern 3-4 storey residential dwellings.
- 7.2.8 The proposed redevelopment would be of predominantly 2-3 storey heights which both reflects the characteristic scale of domestic architecture in the surrounding area and the heights of existing buildings on the site.
- 7.2.9 Three potential locations for four storey buildings are identified on the residential site. One of these is indicated in the location of the existing boiler house which is currently dominated by the tall chimney structures. The other two are suggested towards the southern end of the site either side of the wide swale garden where a building of this scale would serve as a waymarking feature as well as framing views along the swale gardens. Staff are satisfied that the approach to residential heights proposed would have no greater impact upon the openness of the green Belt than the existing buildings on the site.
- 7.2.10 The healthcare facility is identified as being up to 3 storeys high. Staff are satisfied that in the frontage location indicated, on the same building alignment as the existing 2 storey healthcare buildings it is proposed to

retain, and well separated from the northern boundary, that the impact on openness would be neutral.

- 7.2.11 The test within the NPPF in relation to openness is that any redevelopment should not have a greater impact on the openness of the Green Belt. However, this does not mean that new development has to be re-provided in exactly the same location. In this respect there is a balanced judgement to be made about the comparative impacts of the existing and proposed developments upon the openness of the Green Belt. All matters considered, staff are satisfied in the case of both proposals that the indicative masterplan and the parameter plans demonstrate that the impact on openness would be neutral and therefore have no greater or lesser impact. Policy does not require that the impact on openness should be less so as a matter of judgement, it is concluded that the development is not inappropriate development in the Green Belt. Such judgement is, however, dependent upon strict controls on the retention of buildings, the extent of the development envelope, heights and footprints, for which appropriate conditions are suggested.

Character of Development and Visual Impact

- 7.2.12 Staff are satisfied that the proposals will both increase the openness between buildings and replace clusters of large institutional buildings with residential development of a more domestic scale. The average height across the site will be reduced and east/west vistas towards the Ingrebourne Valley will be opened up by the removal of the transverse corridor structure and a perimeter block layout which respects this ambition.
- 7.2.13 In terms of Green Belt policy the conversion of the existing hospital buildings that it is intended to retain is considered acceptable as it involves the re-use of existing buildings. The indicative plan suggest that the open side of the Willows and Northern Ward blocks could be infilled to complete the quadrangle and create a private inner courtyard/amenity space which would also be in accordance with Green Belt policy. The conversion is considered to be appropriate development in accordance with the Green Belt policy of the NPPF and LDF Policy DC45.
- 7.2.14 The proposed siting and scale of the healthcare facility follows the same principles within the master plan, increasing separation from the residential boundary with Hacton Drive compared to the existing institutional buildings on that part of the site, and softening and enhancing boundary treatments.
- 7.2.15 Overall staff are satisfied that the proposed developments satisfy the necessary tests to be considered an exception to inappropriate development. However, the scale of the development proposed in both instances is considered to be the maximum that could be accepted with the context of current policy and guidance. Suitable conditions are suggested to set maxima for unit numbers and footprint. A floorspace limit

is not considered necessary as the other maxima and parameters are considered sufficient to ensure that the visual impact upon the Green Belt remains acceptable .

7.3 Design, Layout and Density

7.3.1 Policies CP17, DC3 and DC61 of the LDF stress the importance of achieving good design and it is central to all objectives of the London Plan.

7.3.2 Policy DC2 provides guidance in relation to the dwelling mix within residential developments, whilst Policy DC3 provides that in considering applications for new housing development design and access statements should address the number of other policies that impact on the design and layout of new developments.

7.3.3 Policy DC61 states that planning permission will only be granted for development which maintains, enhances or improves the character and appearance of the local area and that development must respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding context.

Layout

7.3.4 The layout of the site is a reserved matter. However, the application is accompanied by an illustrative masterplan and Design and Access Statement (DAS) indicating how development of the site to achieve 290 dwellings and a new healthcare facility may be achieved.

7.3.5 For the residential development the masterplan and parameter plans are based on utilising and expanding the existing hospital road layout and creating a series of urban blocks, the majority based upon a perimeter form of development, whilst retaining a frontage to Suttons Lane of retained, converted hospital buildings of heritage value. The layout also seeks to retain and enhance the visual and physical permeability of the site by creating additional east/west long distance views from Suttons Lane to the open Green Belt of the Ingrebourne Valley, together with new north/south views which will enable views from inside the site to Hornchurch Country Park to the south.

7.3.6 For the healthcare development the location and layout has been developed by testing different options. The location on the northern side of the site has been chosen as sites further to the south or east presented issues with integration with the local community and access, or with the need to access the facility through the proposed residential development. Staff are satisfied that the location identified with independent access from Suttons Lane offers the most beneficial and suitable location.

7.3.7 The development of the urban design strategy and these concepts are identified within the DAS which also identifies a number of landscape

character areas, including swale gardens, informal buffers and transition space, a linear park along the Suttons Lane frontage of the site and a central open space.

- 7.3.8 The masterplan approach and parameter plans submitted with this application are the means by which the design concepts that they contain have been translated into a framework for the future submission of reserved matters for both applications. Parameter plans are submitted for approval including ones which show the density of development, a framework showing where residential areas, the healthcare development, open space and access points, would be located, development heights and a play strategy. The illustrative masterplan demonstrates one way in which this could be translated and given the degree to which the parameter plans can be conditioned should the applications be approved, forms the basis on which it is reasonable to anticipate that future reserved matters applications would be submitted. Staff consider that this approach provides an appropriate strategy for determining the layout for any redevelopment of the site.

Density and Residential Mix

- 7.3.9 The density proposed, based upon the entire site area, is 29 dwellings per hectare, largely as a product of the policy requirement that there should be no greater impact arising from the development on the openness of the Green Belt. This is marginally below the general range for suburban areas of the Borough set out in Policy DC2 of 30 – 50 units per hectare arising from the retention of buildings, street pattern and open spaces. Nevertheless, staff are satisfied that this fits with the Green Belt location and the need to maintain openness and also ensures the heritage legacy of the site is retained and the quality of the character for the redevelopment and no objections are raised.
- 7.3.10 In terms of residential mix the scheme would offer a broad range from 1 bed/2 person apartments to 3 bed/5-6 person apartments and 2 bed / 4 person houses to 5 bed / 7 person houses. In proportion the mix would be slightly biased towards apartments largely as a result of the retention of existing buildings. However, with 160 no. units (55%) proposed as housing the scheme would maintain a mixture which would offer opportunity for all and fit well with the established residential character of the area as well as contributing positively to the Council's goals for new housing. A condition is suggested to ensure that the density and mix set out in the parameter plans is maintained in any reserved matters applications.

Design and Scale

- 7.3.11 The detailed design of the scheme is a reserved matter in both instances. The parameter plans and illustrative plans and material within the supporting documents are considered sufficient to indicate that a relatively spacious development will result; that the setting of the buildings will

ensure adequate levels of sunlight and daylight to residential units; and that the buildings are sufficiently separated to ensure adequate outlook and maintain privacy for future occupiers. Appropriate conditions are suggested to safeguard such matters in future reserved matters applications.

Residential Proposal

- 7.3.12 Policy 3.5 of the London Plan advises that housing development should be of the highest quality internally, externally and in relation to their context and to the wider environment. Nationally Described Space Standards have recently been introduced which prescribe standards for a greater range of unit sizes and it is these that developments now need to meet. These are generally either the same or marginally less than the areas previously required by the London Plan.
- 7.3.13 The schedule of accommodation within the DAS indicates that these standards would be satisfied or exceeded in all cases bar four single bedroom units in one of the retained blocks. Whilst it is stated that these units could not be made bigger, alternatives are suggested which could bring them into line with the National Standards. It is suggested that a condition be attached to any permission requiring that all units meet the Nationally Described Space Standards and, subject to this, it is considered that all of the proposed dwellings would be of an acceptable size for day to day living.
- 7.3.14 The DAS indicates that all of the new accommodation would be designed to Lifetime Homes standards which would be in accordance with Policy DC7 which also requires that 10% of all dwellings should be wheelchair adaptable. However, Lifetime Homes standards have recently been superseded by a combination of the nationally described space standards and additional "optional" Building Regulations to be applied through planning policy. Suitable conditions are therefore suggested to ensure that the relevant standards are maintained.
- 7.3.15 At this outline stage the following characteristics and features for the proposed residential redevelopment are highlighted.
- Retention of the original healthcare buildings and pattern of development along Suttons Lane.
 - Away from Suttons Lane the development pattern changes to a more domestic scale with 2/3 storey housing and 3 no. blocks of apartments of no more than 4 storeys height.
 - A road network based upon existing and enhanced vistas through the site from Suttons Lane with development predominantly on the inner side of the road where close to the southern or eastern boundaries of the site to create a more natural softer edge to the open Green Belt beyond.
 - Active frontages to open spaces.

- An open, useable and accessible linear park along the Suttons Lane frontage a minimum of 15m deep and three longer open west to east vistas through the site from Suttons Lane.
- The retention of substantial areas as public open space (2.4 Ha on residential site), including a central open space which would function as a Village Green and landscaped corridors/ linear swale gardens.
- A play space strategy based upon compliance with London Plan policies and SPG on Providing for Children and Young People providing a range of play areas from a Local Equipped Area of Play (LEAP), 3 no. Local Areas of Play (LAP) and 5 no. Door Step LAP's.

Healthcare Proposal

7.3.16 The CCG has looked at the overall size of the plot required to develop a new health centre and the site area identified is the maximum required. . The DAS sets design guidelines for the healthcare proposal which suggest a building of maximum 3 storeys providing up to 3000sqm of floorspace, set in well landscaped grounds. The following characteristics and features for the proposed healthcare redevelopment are highlighted.

- Location to the north of the site limits the impact upon buildings of heritage importance and assists with integration into the local community.
- Independent access from Suttons Lane.
- The provision of a minimum 15m deep landscape buffer to Suttons Lane as part of the linear park.
- A secure perimeter to the site (the linear park would be outside this) softened by perimeter hedges and the retention of existing trees, hedges and buffer landscaping.
- A maximum 3 storey development with active facades facing south towards the proposed residential development and to Suttons Lane.

Overall

7.3.17 The DAS section on Design Guidelines establishes and emphasises a number of key principles which are reflected in the illustrative masterplan and the nature of the public realm to be created, rather than dictating matters of detail and building design. Taken together with the parameter plans and illustrative masterplan the design guidelines provide a cogent framework for the submission of future reserved matters applications without prescribing a final design solution. In order to ensure that subsequent reserved matters applications pay proper regard to these documents suitable conditions are proposed.

7.3.18 There are areas where special care, treatments and restrictions will be required in order to safeguard the open appearance of the site, particularly on the residential site. These will be important considerations for the subsequent submission of reserved matters applications where details of design and materials are determined. Conditions are suggested to

address and focus attention on matters such as materials, tree and landscape retention and new landscaping together with conditions to restrict permitted development rights for front garden fencing and walls, the creation of front garden hard standings, porches and loft conversions, all of which might otherwise collectively impact adversely upon the open character of the site and the Green Belt.

Amenity Space

- 7.3.19 Havering's Residential Design SPD does not prescribe minimum space standards for private gardens. The SPD does however state that private amenity space should be provided in single useable, enclosed blocks which benefit from both natural sunlight and shading, adding that the fundamental design considerations for amenity space should be the quality and usability. All dwellings should have access to amenity space which is not overlooked from the public realm.
- 7.3.20 The illustrative masterplan shows three key types of amenity area: traditional gardens with a depth generally of 10m or greater; shared communal courtyards for the retained and converted quadrangular blocks; semi-private terraces and balconies for other retained buildings and new apartment blocks. All of these amenity spaces have proved from experience to be functional and to provide adequate private and semi private amenity space in other developments and are considered to be acceptable in this instance. Furthermore, such space would be supplemented by the open space and play areas within the development and the adjacent Hornchurch Country Park.
- 7.3.21 Looking at how the design concepts are interpreted within the application, staff are satisfied that the proposed development would offer an attractive and desirable place to live in terms of design, layout and residential quality.

Landscaping

- 7.3.22 There are a suite of policies and documents within Havering's LDF and supporting Supplementary Planning Documents (SPD) which collectively provide guidance and requirements related to the conservation and enhancement of landscape character in the Borough.
- 7.3.23 Policy DC61 requires that new development must harness the topographical and ecological character of the site, including the retention of existing trees and landscape.
- 7.3.24 Policy DC21 requires major new residential development to include provision for adequate open space, recreation and leisure facilities.
- 7.3.25 Policy DC20 sets standards for the provision of public open space and children's play space which is also covered by Policy 3.6 of the London

Plan supplemented by the Mayor's "Shaping Neighbourhoods: Play and Recreation SPG (2012).

- 7.3.26 The Landscape Strategy outlined within the DAS identifies that maintaining and enhancing the existing open space and planting on both sites will be the key to a site wide approach to a landscape design which respects the existing mature landscape setting of the site. The Zone Uses & Access and Strategic Open Space parameter plans establish the location and function of the different types of open space proposed for the whole site which include swales, buffer land, a village green, linear park and open space around retained buildings. Aspects such as the removal of the existing boundary railings and fences will serve to open up views and public access to the site which will make a notable positive impact on the visual openness of the site. This will be of particular note along the frontage of the site where a 15m wide linear park would be created.
- 7.3.27 Much emphasis has been placed upon the retention of existing trees and vegetation. An Arboricultural Impact Assessment accompanied the application which identified and classified every tree on the site according to its health and amenity value. The site contains 141 existing trees and the masterplan layout seeks to retain 95 of these. It is proposed that the loss of 46 trees overall, 30 of which are classified as being in poor health, would be balanced by the planting of 100 new trees throughout the site. The trees on the site have been made the subject of an Area Tree Preservation Order and staff are satisfied that the approach to tree retention and planting is acceptable and can be properly controlled through the use of appropriate conditions.
- 7.3.28 The strategy for play space has been developed in line with the Mayor's "Shaping Neighbourhoods: Play and Recreation" SPG (2012) and indicates the provision of one Local Equipped Area of Play (LEAP), 3 no. Local Areas of Play (LAP), 5 no. Door Step LAPs and a Youth Space. Together with enhanced links to the adjacent Hornchurch Country Park plus private and communal garden areas staff are satisfied that the requirement has been adequately addressed.

7.4 **Heritage Issues**

- 7.4.1 Policy DC67 provides guidance on dealing with applications which impact upon Listed Buildings and other buildings of heritage interest and states that account will be taken of their contribution to heritage.
- 7.4.2 Policy 7.8 of the London Plan recognises the importance of heritage assets and requires that development affecting such assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 7.4.3 The NPPF reinforces these messages confirming at para 135 that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application and that

a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. NPPG adds to this at para 041 by suggesting, in the case of buildings, that their significance should be judged against published criteria, which may be generated as part of the process of producing a local list.

- 7.4.4 St George's Hospital has been identified as a building of local heritage interest and is therefore classified as a non-designated heritage asset. The judgement to be made is whether the scale of loss and the extent of harm proposed is acceptable in relation to the significance of the heritage asset that St Georges Hospital represents.
- 7.4.5 The applications are supported by a Historical Background report and a Heritage Assessment. The former provides a narrative of the development of St Georges Hospital its buildings and surroundings, from its inception as Suttons Institute in 1938: the close association with RAF Hornchurch through to the modern day and its closure in 2012. It goes on to evaluate the group value of the site, followed by a building by building assessment which identifies those of greater significance both architecturally and historically. This concludes that the buildings of the greatest interest are concentrated towards Suttons Lane. The Heritage Assessment looks at the significance of the buildings as a heritage asset and the impact in terms of significance of the proposed demolition of 13 of the 19 buildings on the site.
- 7.4.6 The scheme proposes the retention and re-use of 4 of the six most important buildings on the site, plus three others, all of which offer the opportunity for viable residential conversion. The choice of these buildings is based largely upon their visual prominence and the role they would play in maintaining the visual identity of the site when viewed from Suttons Lane. The existing rectilinear "street" pattern of the site is also retained as a template for the layout of the new development.
- 7.4.7 Whilst there will be considerable changes to the character of the site and the setting of the retained buildings as a result of the redevelopment, staff are satisfied that the choice of the buildings to be retained is soundly based and justified. Moreover, the final form of development as proposed based upon the existing rectilinear layout, maximum retention of existing trees and enhancement of landscaping and the emphasis on improving vistas through the site to the Ingrebourne Valley, demonstrate compliance with the relevant policies and guidance. However, the loss of the identified buildings is considered to be the maximum permissible for the proposals to still be considered in accordance with the NPPF. A condition is therefore suggested to reinforce this and to require that none of the buildings identified for retention may be demolished.

7.5 **Impact on Amenity**

- 7.5.1 The closest existing residential properties to the site are those in Suttons Lane (No's 62 to 154) on the western side of the road and No. 111

Suttons Lane and No's 2 to 86 Hacton Drive to the north. With the exception of the gatehouse and its proposed mirror image new dwelling, both of which will be 25m from the properties opposite in Suttons Lane, neither the proposed residential or healthcare development, will be closer than 50m from the front of these properties, in line with the existing buildings on the site. Apart from in 3 locations where the potential for 4-storey development is identified the development would be no higher than 3 storeys. Separated from these properties by Suttons Lane, front gardens and the proposed linear park staff consider that the developments proposed would be consistent with the existing character and pattern of development locally and that no material harm to residential amenity will arise from the buildings by way of their proximity or height.

- 7.5.2 In relation to the properties in Hacton Drive the illustrative master plan indicates that any residential plot would back onto the boundary with a minimum separation of 35m between the rear of any new and existing dwelling. In relation to the healthcare development the minimum separation increases to 50m. Similarly, staff do not consider that any adverse impact upon residential amenity will result from this relationship.

7.6 **Transportation, Highways and Parking**

- 7.6.1 The application is accompanied by a Transport Assessment (TA) which concludes, based upon the current vacant nature of the site, that there will be an increase in traffic generation over existing conditions but that this will be within the capacity of the local highway network. It also finds that in the event that the use of the site were to revert to its previous lawful use, that such use would generate more traffic than that currently predicted by the proposed residential and healthcare developments.

- 7.6.2 Further information has been supplied to demonstrate that the impact upon local junctions which show that the potential difference to queuing at junctions would fall within the expectation of traffic flow variation and as such would not be perceptible to casual users of the affected junctions. Information requested by Transport for London relating to the impact upon bus services and whether a need would arise for further services has also been supplied, and concluded that any impact could be absorbed within the existing services.

Residential Proposal

- 7.6.3 The residential development will use the two existing access points to the site whilst the healthcare development will require a new access onto Suttons Lane. Following discussions with Highways staff the applicants have advised that the originally indicated widening of Suttons Lane and provision of ghosted right turns no longer forms part of the proposals. No objection is raised to this. The existing junctions to the site have functioned quite adequately and safely in the past. Elsewhere along Suttons Lane similar junctions serving residential areas of equal or larger capacity also continue to function without any significant highway safety

problem. Suitable conditions are proposed to ensure that schemes for the design of the junctions are submitted.

- 7.6.4 The proposals provides for 490 residential parking spaces across the scheme which equates to 1.7 spaces per unit. TfL is concerned that this level of parking is too high and likely to be out of accordance with the London Plan.
- 7.6.5 London Plan parking standards are set out in table 6.2 of Policy 6.13, which gives maximum parking standards of 2 - 1.5 spaces for 4 bed units, 1.5-1 spaces for 3 bed units and less than 1 space for 1-2 bed units. It is however noted that the policy is intended to take a flexible approach to parking so that provision should also reflect the density of the development and the PTAL (public transport accessibility level) with lower levels expected where the PTAL levels is high and/or where densities are higher particularly in central locations. As a result of the site's size and depth the PTAL varies across the site varying from 3 to 1b meaning that the site has moderate to poor access. The location of the site is suburban and the density low.
- 7.6.6 In terms of the LDF, Policy DC2 would anticipate residential development on this site providing parking at a standard of 2-1.5 spaces per unit. Having regard to the location of the site, although there are opportunities for walking, cycling and use of public transport locally, it is considered that demand for parking at the site is likely to be high, particularly in view of the mix and number of dwellings compared to flats within the development. There is concern regarding the potential increased demand for on street parking and resultant congestion if insufficient parking were provided within the development. Furthermore, unregulated on street parking would have an adverse effect upon the character of the site and the open nature of the Green Belt. On this basis it is considered that a parking level as proposed at 1.7 spaces per unit overall would create less pressure for on street parking to the benefit of the character of the development. Such a level would be in accordance with Policy DC2 and no objections are raised.

Healthcare Proposal

- 7.6.7 Car parking for the healthcare development at 50 spaces is indicative as the nature of the facilities to be provided are at this stage of development are uncertain. However, there is sufficient room on the site for parking to be provided to LDF standards and an appropriate condition is suggested.
- 7.6.8 The TA indicates that parking for disabled drivers will be made available in appropriate locations. Where associated with wheelchair units such spaces should be conveniently located for the main entrance and at least 5% of visitor spaces should be designated for blue badge holders. This can be secured through condition.

7.6.9 The London Plan requires that a minimum of 20% of parking spaces will be fitted with active provision of electric vehicle charging points and up to a total of 40% of the spaces will be provided with the passive provision of electric vehicle charging points. This too can be secured through conditions on both applications.

7.6.10 London Plan Policy 6.9 Table 6.3 sets out the Mayor's current adopted levels of cycle parking which for residential development requires all studio and 1 bed units to be provided with a minimum of 1 cycle storage place and all 2+ bed units to be provided with a minimum of 2 spaces, and for a health centre, 1 space per 5 staff (long stay) and 1 space per 3 staff (short stay). The applications propose the level of cycle parking provision for the residential at a minimum of 1 space per dwelling and in accordance with LDF standards for the healthcare development (1 per 50 staff plus 1 per 5 staff for visitors). As both applications are in outline there is no reason why the London Plan standards cannot be achieved and appropriate conditions are suggested.

7.7 **Housing**

7.7.1 In terms of housing mix the residential redevelopment provides up to 290 dwellings consisting of up to 160 houses and 130 flats, which is a 55/45 split. The mix of dwelling sizes has not yet been finalised, but the indicative proposals and breakdown demonstrate that the development would comprise a range of units including 1 to 3 bedroom flats and 2 to 5 bedroom houses, with the largest proportion being 2 and 3 bed units, but with 47% of all units being 3 bed plus units. Whilst it is recognised that an ideal mix would deliver a higher proportion of 3 bed+ family units, the nature of the development is skewed by the proportion of the development that would be delivered by the conversion of the retained heritage buildings. It is therefore considered that the residential proposal satisfies in principle Policy 3.8 of the London Plan.

7.7.2 Policy DC6 of the LDF states that the Council will aim to achieve 50% of all new homes as affordable and will seek a tenure split of 70:30 between social housing and intermediate forms. This policy reflects the targets for the provision of affordable housing which were set out in Policy 3A of the superseded London Plan. The current London Plan seeks a tenure split of 60:40 and requires the amount of affordable housing provision to be determined strategically at local level. The Council's current Housing Strategy 2014-17, moves from a 60:40 tenure split to 50:50 in year 3 of the strategy (16/17) which is the earliest that any delivery of affordable housing from the redevelopment could be anticipated and it is on this basis that staff recommend any affordable housing would be provided.

7.7.3 The application when submitted offered 10% affordable housing on the basis of guidance current at the time the application was made which had introduced Vacant Building Credit (VBC) as a means of encouraging housing development on previously developed "brownfield" sites. The application of VBC to the St Georges site resulted in an offer of 10%

affordable housing as a policy compliant position. However, as a result of a more recent High Court decision the ministerial statement which led to the introduction of VBC has been ruled unlawful and can no longer be used to determine the quantum of affordable housing a scheme should deliver.

7.7.4 Policy recognises that the proportion of affordable housing that can be delivered can be affected by a number of factors including viability. Consequently, as a result of the High Court decision the applicant was obliged to carry out a Viability Assessment in order to determine the amount of affordable housing that the scheme could afford to deliver. Following an independent review of this on behalf of the Council and resultant negotiations with the applicant a revised offer of 15% affordable housing is now proposed.

7.7.5 Staff are satisfied that there are likely to be some additional costs associated with developing the site, including demolition, the removal of underground services and asbestos, together with the retention and conversion works which are known to be more expensive than new build. Accordingly it is considered that the 15% offer represents the maximum amount of affordable housing that can reasonably be achieved on the site. This is further supported in the context of the land being NHS estate and the recycling of funds raised from the land sale, albeit indirectly, back into health service facilities.

7.7.6 As a potential alternative to all of the affordable housing being provided on site it is suggested that the terms of the S106 should also allow for the possibility of a commuted sum being provided for the off-site provision of social rented housing. Such proviso would be on the basis that the overall provision of affordable housing that this would enable would be greater than 15% on offer and that it would also allow for off-site provision that may better suit the Council's requirements for meeting the particular characteristics of its housing need.

7.8 **Environmental Issues**

Flood Risk and Drainage

7.8.1 The site lies on the eastern side of the Ingrebourne Valley which the Environment Agency have confirmed is located in Flood Zone 1 and so is at minimal risk of flooding and suitable for both residential and healthcare use. The main focus of the Flood Risk Assessment is therefore to provide a suitable scheme for attenuating surface water within the site to ensure allowable discharge rates from the site achieved.

7.8.2 The site lies on London Clay bedrock so infiltration SuDS measures cannot be used. For the healthcare facility a surface water management strategy based upon the provision of surface water attenuation features discharging via an existing outfall is proposed. This would be either in the form of underground modular storage or an attenuation pond.

- 7.8.3 A variety of SuDS measures are identified for the surface water management on the residential area comprising a combination of source control SuDS (green roofs, permeable paving, rainwater harvesting), swales and attenuation basins, which could be designed to be sympathetic and complementary to the existing ecology of the site. The final strategy for management is to be confirmed as part of future reserved matters applications but is likely to fall within the remit of a future private management company.
- 7.8.4 The overall surface water management system would be designed to accommodate runoff for events up to the 1 in 100 years event (plus a 30% allowance for climate change) with runoff rates restricted to 3 times the greenfield runoff rate.
- 7.8.5 The Environment Agency (EA) has confirmed that it has no objection to the proposals subject to a detailed surface water drainage scheme being agreed which should be based upon the strategies outline in the submitted FRA. The EA also requested a condition requiring that surface water pollution prevention and treatment measures be agreed and installed. Such a condition would also address the objections raised by Natural England which are concerned with potential damage that polluted runoff and discharge to the River Ingrebourne might cause to the Ingrebourne Marshes SSSI.
- 7.8.6 It is considered that subject to these conditions the development would accord with LDF Policy DC48 as well as Policies 5.12 and 5.13 of the London Plan and the NPPF. It should be noted that Natural England's Objection had not at the time of writing been lifted and that they would need to be given 21 days notice of any intention to grant permission.

Ecology and Biodiversity

- 7.8.7 The site includes substantial areas of open grassland as well as many mature trees and other potential habitats. The Ingrebourne Valley lies to the immediate south east of the site together with the Hornchurch Country Park which also lies adjacent to and further to the south of the site. Both are identified as sites of Metropolitan Importance for Nature Conservation. The Ingrebourne Marshes SSSI is located approximately 0.6km south of the site.
- 7.8.8 A Baseline Ecological Appraisal has been undertaken based on the results of an Extended Phase 1 Habitat Survey of the site, desk based studies and species surveys for Badgers, Great Crested Newts and Bats as well as general faunal activity observed during the course of survey work. Following from the recommendations of the Extended Phase 1 Survey Phase 2 ecological surveys were undertaken including a bat scoping survey and a reptile presence/absence survey.
- 7.8.9 In terms of impact upon habitat, by basing the masterplan layout upon the existing rectilinear layout with landscaped corridors, staff are satisfied that

the impact upon ecology and biodiversity would be minimised, and wherever possible enhanced, for example by a reduction in the amount of hard standing and the creation of a central open space in the same location as the most significant area of existing open space on the site. .

- 7.8.10 Positive and preventative measures are proposed to address areas of concern in relation to bats, reptiles and birds such as the retention and provision of roost opportunities, provision of specialist bird boxes aimed at the existing known breeding avian population, plus full surveys of particular habitats and protected species. These matters can all be safeguarded by the use of appropriate conditions.
- 7.8.11 At the time of writing the report the objection from Natural England had not been removed, and the request for an assessment of the recreational impact of the development upon the SSSI has been reiterated. Staff consider that it would be difficult to estimate and evidence what the impact of the proposals upon the SSSI would be as it is partially located within Hornchurch Country Park which is well used by a far larger population already than that which is proposed. Furthermore, informal recreational use of and access to the countryside is encouraged and the Council is keen to promote the positive and beneficial use of Hornchurch Country Park. Finally, staff do not agree that there is any significant threat posed by additional cat predation as the development is over 0.5km away from the closest point of the SSSI.

Archaeology

- 7.8.12 An Archaeological Desk Based Assessment has been submitted with the application which has identified the presence of prehistoric settlement sites and features across the sites. It is also noted that many of the existing buildings on the site are in themselves of historic, if not archaeological interest and that provision should be made for a programme of Historic Building Recording should be carried out.
- 7.8.13 Historic England (GLAAS) advise that the proposals would either affect a heritage asset of archaeological interest or lies in an area where such assets are expected. The advice is that there is a need for field evaluation to determine the appropriate mitigation. A condition is requested requiring a two stage process or archaeological investigation to evaluate and clarify the nature and extent of surviving remains, followed, if necessary by a full investigation. Staff consider that subject to such a condition the development would be acceptable in principle and would comply with Policy 7.8 of the London Plan and Policy DC70 of the LDF.

Sustainability and Renewable Energy

- 7.8.14 A sustainability statement and an energy statement have been submitted with the application. In line with the requirements of the London Plan and Policies DC49 and DC50, the proposal is required to meet high standards of sustainable design and construction, as well as to demonstrate a

reduction in predicted carbon dioxide emissions by at least 35% against Part L 2013.

- 7.8.15 The submitted documents were written before the Code for Sustainable Homes was scrapped but had adopted the standard of achieving Level 4 CfSH for the residential development and BREEAM (which still exists) “very good” for the healthcare centre. Sustainable design principles have been integrated into the scheme to address resource management (design standards, energy efficiency, demand reduction, water saving, choice of materials), Adaptation to Climate Change and Greening the City (passive heating and cooling, SuDS, controlled runoff rate, green infrastructure) and Pollution Management (air quality neutral design, best practice during construction, external lighting to minimise glare). Carbon Dioxide reduction would be achieved by a combination of improved insulation, high efficiency gas condensing boilers and solar control measures, supplemented by photovoltaics. The potential for CHP to be used will be reviewed at reserved matters stage.
- 7.8.16 The healthcare facility would promote the use of sustainable modes of transport for both staff and patients and is reasonably well located in terms of public transport accessibility to achieve this. A draft Framework Travel Plan has been submitted which would be suitable, with amendments, for both the residential and healthcare proposals, and would be required by condition should Members agree with the recommendation.
- 7.8.17 Staff are satisfied that the proposals will be in accordance with the relevant LDF and London Plan energy and sustainability policies and a number of conditions relating to these matters are suggested for both proposals.

Contaminated Land

- 7.8.18 A Phase 1 desktop study and a Phase II report following intrusive site investigation were submitted with the application. It concludes that there are some limited areas where areas of contamination will need to be remediated and areas of elevated Carbon dioxide in the soil which might require the use of gas membranes in the foundations and floor slabs as well advising that an asbestos survey be carried out. Staff therefore consider the proposals accord in principle with LDF Policy DC53 and Policy 5.21 of the London Plan and conditions can be imposed on both applications to ensure the necessary remediation schemes and further survey and validation reports are undertaken and submitted.

7.9 Other Matters

- 7.9.1 Public Footpath 271 abuts the southern boundary of the site providing a route from Suttons Lane across the Ingrebourne Valley to Hacton Lane. The DAS and parameter plans indicate a connection to this from the north/south swale garden which is encouraged. Concern has been voiced about the potential for any other indicated routes over land beyond the site

boundary in 3rd party ownership encouraging unauthorised access and increasing pressure for further development. Members will note this concern, but can be reassured that any such access would need to be negotiated with other owners and that the conditions that would be attached to any permission would make it clear that the extent of the current applications are the maximum permissible on the site for the development to be considered in accordance with current Green Belt policy and guidance.

7.9.2 Secure by Design is a material planning consideration and would be covered by condition and is more appropriately considered at reserved matters stage.

7.9.3 In relation to objections raised, where these raise planning issues they have been addressed throughout the report. To summarise:

Residential

Pressure on Local Services – Addressed by S106 requirement for education payment. Sale of the site will provide funds to the NHS.

Increased Traffic etc – Road widening no longer proposed, traffic no greater than would be the case if the site reverted to its lawful use. No highway objections.

Pollution – Air quality and Construction Management conditions.

Parking problems – Proposed parking provision considered acceptable.

Fear of greater development – Controlled via parameter and maxima conditions.

Height and Density – See paras 7.2.9, 7.2.10 and 7.3.9

Suitability for housing and no affordable housing – See section 7.1. Affordable housing is a policy requirement.

Future maintenance of Landscaping – S106 requirement

Retirement Village – Not the subject of this application.

Healthcare

Privacy and Amenity – See section 7.5

Details not provided – Outline application, details not required.

Additional traffic - Traffic no greater than would be the case if the site reverted to its lawful use. No highway objections.

General

Quality of pre-app consultation – Opinion. Staff satisfied and Statement of Community Involvement submitted

Pre-school nursery – Not the subject of application

7.10 **Infrastructure Impact and Planning Obligations**

7.10.1 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (CIL Regulations) states that a planning obligation may only constitute a

reason for granting planning permission for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

- 7.10.2 Policy DC72 of the Council's LDF states that in order to comply with the principles as set out in several of the policies in the Plan, contributions may be sought and secured through a Planning Obligation. Policy 8.2 of the Further Alterations to the London Plan states that development proposals should address strategic as well as local priorities in planning obligations.
- 7.10.3 In 2013, the Council adopted its Planning Obligations Supplementary Planning Document which sought to apply a tariff style contribution to all development that resulted in additional residential dwellings, with the contributions being pooled for use on identified infrastructure.
- 7.10.4 There has been a recent change to the effect of the CIL Regulations in that from 6th April 2015, Regulation 123 of the CIL Regulations states that no more than 5 obligations can be used to fund particular infrastructure projects or infrastructure types. As such, the SPD, in terms of pooling contributions, is now out of date, although the underlying evidence base is still relevant and up to date for the purposes of calculating the revised S106 contributions.
- 7.10.5 The evidence background to the SPD, contained in the technical appendices is still considered relevant. The evidence clearly show the impact of new residential development upon infrastructure – at 2013, this was that each additional dwelling in the Borough has a need for at least £20,444 of infrastructure. Therefore, it is considered that the impact on infrastructure as a result of the proposed development would be significant and without suitable mitigation would be contrary to Policy DC72 of the LDF and Policy 8.2 of the London Plan.
- 7.10.6 Furthermore, evidence clearly shows a shortage of school places in most parts of the Borough – (London Borough of Havering Draft Commissioning Plan for Education Provision 2015/16-2019/20). The Commissioning report shows need for secondary places and post-16 places which due to their nature would serve all parts of the Borough. The Commissioning report identifies that there is no spare capacity to accommodate demand for primary and early year's school places generated by new development. The cost of mitigating new development in respect to all education provision is £8,672 (2013 figure from Technical Appendix to SPD). On that basis, it is necessary to continue to require contributions to mitigate the impact of additional dwellings in the Borough, unless the development is within an area of the Borough where there is a surplus of school places. In this instance, given the juxtaposition of the site to Hornchurch Country Park it is also considered that a contribution towards improvements to the park would satisfy the tests set out at para 7.10.1 although the principle

use of the overall contributions would remain for educational purposes. Previously, in accordance with the SPD, a contribution of £6000 per dwelling was sought. It is considered that this is reasonable when compared to the need arising as a result of the development.

- 7.10.7 Separate monitoring of contributions would be required to ensure that no more than 5 contributions are pooled for individual projects. It is considered that a contribution equating to £6000 per dwelling to be used for educational purposes, together with improvements to Hornchurch Country Park and to cycle storage facilities at Hornchurch Station would be appropriate.

8. **Conclusions**

- 8.1 The proposals are for the outline redevelopment of the St Georges Hospital site to provide up to 290 dwellings and a 3,000sqm healthcare centre with all matters reserved except for access.
- 8.2 The site is located within the Green Belt and currently vacant and having been declared surplus to NHS requirements with the land not identified for healthcare purposes to be marketed if planning permission is granted. The receipt from any sale would be reinvested in the NHS.
- 8.3 A set of guidelines, parameters and an indicative masterplan have been developed to guide the future submission of reserved matters applications and to demonstrate that the site can be redeveloped in accordance with current guidance. This requires that any such redevelopment should not have any greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.
- 8.4 Staff are satisfied that subject to strict controls relating to the extent of demolition, retention of specified buildings, the development envelope and height and other design requirements that the proposals meet the necessary tests.
- 8.5 Staff are satisfied that, in principle, the site can accommodate up to the maximum quantum of development proposed, whilst providing a development of suitably high quality and impact on local character and the Green Belt. However, there are elements within the illustrative masterplan and parameter plans which are dependent on the particular design solutions proposed and conditions are suggested to ensure that any reserved matters applications adhere to these.
- 8.6 The overall design principles of the development are acceptable, including the provision of accesses from Suttons Lane, the landscaping, connectivity and open space strategies. It will need to be demonstrated how these will be carried through to the detailed design phase of any proposed development.

- 8.7 The residential development will provide 15% affordable housing with a 50/50 split between social rent and intermediate housing, with provision for a commuted sum for the provision of social rented accommodation off site should this achieve a higher level of affordable housing and better meet the Council's housing needs. Financial contributions towards the provision of additional school places, for improvements to Hornchurch Country Park and cycle facilities at Hornchurch Station would be secured through a S106 agreement related to the residential proposal.
- 8.8 The proposal is considered to be acceptable in respect of all other material issues, including parking and highway issues, impact on amenity and environmental effects.
- 8.9 Subject to planning conditions, the requirement for a S106 agreement related to P0321.15, and no contrary direction from the Mayor for London, Staff consider both proposals to be acceptable and recommend that planning permission be granted.

IMPLICATIONS AND RISKS

Financial Implications and risks:

A Section 106 planning obligation is required to make the residential application acceptable. The agreement will include the payment of the Council's legal expenses involved in drafting the S106 agreement.

Legal Implications and risks:

Legal resources will be required for the completion of a legal agreement

Human Resource Implications:

None

Equalities and Social Inclusion Implications:

The Council's planning policies are implemented with regard to equality and diversity. The residential development would include a mix of unit types, and would be conditioned to ensure the inclusion of units that provide for wheelchair adaptable housing, and units which are designed to nationally described standards. The development also includes the provision affordable housing, thus contributing to the provision of mixed and balanced communities. The healthcare development would incorporate all necessary facilities to ensure equality of access and is well located to serve all of the local community.

BACKGROUND PAPERS

None