



<b>Pre-Application Reference:</b>	<b>PE/00478/18</b>
<b>Location:</b>	<b>ST. GEORGE'S HOSPITAL, SUTTONS LANE, HORNCHURCH</b>
<b>Ward:</b>	<b>HACTON</b>
<b>Description:</b>	<b>PHASE 2 OF PROPOSED REDEVELOPMENT</b>
<b>Case Officer:</b>	<b>MARTIN KNOWLES</b>

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## 1 BACKGROUND

- 1.1 This proposed development is being presented for a second time to enable Members of the committee to view the changes that have been made before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 1.2 The redevelopment of the majority of the St. George's Hospital site was granted planning permission on appeal in July 2017 following the refusal of the hybrid (Part detailed part outline) application P0321.15 by Regulatory Services Committee. Permission was granted for partial demolition and partial conversion of existing buildings to provide 290 dwellings. A reserved matters application P0924.18 is currently under consideration for the implementation of the new build element of the planning permission comprising the construction of 194 dwellings behind the buildings due to be demolished and/or converted.
- 1.3 As previously advised in the report to Strategic Committee in July the applicants intend to bring forward proposals for that part of the site closest to Suttons Lane as a fresh full planning application. Following from that earlier report further pre-application discussions with the applicants have taken place along with a site visit by Members and a pre-application meeting with the

GLA. As a result the proposals have been developed further and are being brought to Committee prior to submission of the planning application.

## **2 PROPOSAL AND LOCATION DETAILS**

### **Proposal**

- 2.1 A detailed structural survey of the buildings that were earmarked by P0321.15 as being suitable for retention and conversion identified significant structural defects. The scale of the defects rendered retention and conversion on the scale envisaged as being both financially unviable and structurally challenging to the point where substantial demolition would be required.
- 2.2 The first proposals tabled by the applicants were for the total demolition of all existing buildings identified for retention. Following initial discussions with staff the proposals the subject of the first report and presentation were to
- retain the central admin block and the frontage sections of the two ward blocks;
  - demolish the rearward sections of the ward blocks and the Ingrebourne block.
  - Extend rearwards the retained frontage sections of the ward blocks
  - Build 3 no. linear 4 storey blocks to the east creating a private residents courtyard between the retained and retained extended blocks and the new build.
  - Replace the existing gatehouse with a semi-detached pair and a mirror image pair to the south of the main central access.
  - Deliver 165 no. residential units, an uplift of 69 units compared to the approved scheme;
  - 35% of the uplift (69 units) would be delivered as affordable housing
  - Not result in an increased footprint of development on the site.
  - Retain existing access points from Suttons Lane.
- 2.3 Members of the Committee then questioned the presenters and raised issues for further consideration

The main issues raised were:

- Members requested a site visit before this comes to SPC again given the complexity of the site and the local heritage assets;
- The need to ensure that as much as possible of the locally listed building is retained;

- Importance of new buildings respecting the architectural character of retained buildings;
- Design of vehicular entrance will be important and the need for two access points
- Housing mix will need to take into account housing need in the area
- Provision of affordable housing will need to be managed properly, ensure affordability is optimised and that an appropriate tenure mix is provided;
- Affordable housing should be distributed throughout the estate where this is possible and should be tenure blind
- The desirability of local marketing of for sale housing was emphasised
- The level of car parking will be important given the quality of public transport locally and the potential to improve bus services should be explored.

2.4 The site visit for members was held on 19<sup>th</sup> July where members were shown around the site with particular attention to the exterior and interior of one of the frontage ward blocks which was at that time earmarked for retention and conversion. Members were able to appreciate the full extent of the structural defects of the buildings and the difficulties that these would present for a scheme which intended large scale retention whilst still required to meet modern day standards. As a result Members were sympathetic to the idea that the frontage ward blocks be demolished and rebuilt to a near identical design, incorporating as many of the original features and details as possible, but giving the opportunity for the new dwellings to be built to modern standards and to give a full lifetime of use.

2.5 The revised proposals have embraced and developed this approach for the blocks either side of the original central administration block which is still to be retained and refurbished. The revised proposals can be summarised as follows:

- Retain the central admin block only
- Demolish the whole of both frontage ward blocks and the Ingrebourne block
- Redevelop the ward block sites on the same alignment and with a design and layout which replicates the design and features of the existing building frontage and part of the return flanks whilst incorporating a sympathetic but modern rearward section.
- Build 3 no. linear 4 storey blocks to the east creating a private residents courtyard between the retained and retained extended blocks and the new build.

- Replace the existing gatehouse with a semi-detached pair and a mirror image pair to the south of the main central access.
- Deliver 162 no. residential units, an uplift of 66 units compared to the approved scheme, but a reduction of 3 units compared to that previously presented;
- 35% of the uplift (22 units) would be delivered as affordable housing
- Not result in an increased footprint of development on the site.
- Retain existing access points from Suttons Lane.
- Develop a theme for the landscaping of the site which reflects the historic linkage of the site to RAF Hornchurch.
- Provides a permanent home for a museum/exhibition dedicated to RAF Hornchurch

## **Site and Surroundings**

- 2.6 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.
- 2.7 The site is bound to the north by the part of the hospital site identified for health related purposes, to the east and south by the hospital site the subject of outline planning permission and to the west by Suttons Lane with houses facing the site across the road. Further to the east and south are open areas comprising the Ingrebourne River Valley and Hornchurch Country Park. The site is broadly rectangular and relatively flat but with a perceptible fall from west to east and north to south.
- 2.8 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).
- 2.9 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.

## **Planning History**

2.10 The following planning decisions are relevant to the application:

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 ha of the wider site, together with associated car parking, landscape and infrastructure works – Refused on grounds that it would have a greater impact on the openness of the Green Belt. It would constitute inappropriate development which would be harmful to the visual amenities of the Green Belt. Four of the proposed units would fail to achieve the minimum Nationally Described Space Standard and the lack of a legal agreement. Appeal allowed and reserved matters under consideration P0924.18.

P0323.15 - The redevelopment of the St Georges Hospital site inclusive of partial demolition of existing buildings to provide up to 3,000m<sup>2</sup> 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 – Resolved to approve and currently stalled with the Mayor of London at Stage II.

P0459.16 The redevelopment of the St George's Hospital site inclusive of partial demolition and conversion of existing buildings to provide up to 279 dwellings on 10.1 ha of the wider site, together with associated car parking, landscape and infrastructure works – Resolved to approve, stalled with the Mayor of London at Stage II and subsequently withdrawn when appeal on P0321.15 was allowed.

## **3 CONSULTATION**

3.1 At this stage, it is intended that the following will be consulted regarding any subsequent planning application:

- Greater London Authority (Statutory Consultee)
- Transport for London (Statutory Consultee)
- Environment Agency
- Historic England -Archaeology
- Thames Water
- Essex and Suffolk Water
- EDF Energy
- National Grid/Cadent – Gas
- LFEPA – Water
- Fire Brigade
- Natural England

- Essex Wildlife

The following consultees have commented as part of the pre-application process:

3.2 None to date

#### **4 COMMUNITY ENGAGEMENT**

4.1 The developer has consulted the local community at a well attended public open day at the St. George's site which was held on 26<sup>th</sup> July with a further day scheduled for September, due to the level of interest shown at the first meeting.

#### **5 MATERIAL PLANNING CONSIDERATIONS**

5.1 The main planning issues raised by the application that the committee must consider are:

- Principle of development
- Green Belt impact
- Heritage impact
- Density, scale and site layout
- Housing mix/affordable housing
- Other issues

##### **5.2 Principle of development**

As set out in the previous report there is strong support in policy terms for the principle of the redevelopment of the site for residential purposes as well as this being established by the grant of planning permission on appeal.

This is subject to meeting the criteria for suitable Green Belt development set out in the NPPF/NPPG and other relevant policy tests and judgements in relation to other matters set out below.

##### **5.3 Green Belt impact**

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. However, the partial or complete redevelopment of previously developed sites can 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 judged 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.

Such judgements of Green Belt impact can be assisted by assessments of the quantum of development comparing such aspects as footprint, volume, height, floorspace and development envelope of the existing development to that which is proposed. However, impact upon openness and visual impact cannot be made entirely upon empirical evidence and factors such as ground levels and visibility need to be considered when making judgements about comparative impact.

As yet staff have not come to any provisional judgement on Green Belt impact. When assessing the hybrid application it was demonstrated that there would be reductions in the total footprint and volume as a result of the redevelopment and this together with other factors led to a judgement that the development did not constitute inappropriate development in the Green Belt. This empirical evidence has not yet been provided and consideration of this together with other factors will be important in determining whether the revised proposals remain appropriate Green Belt development.

#### 5.4 Heritage impact

There are no listed buildings on the site but the Hospital in its entirety 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.

Policy DC67 provides guidance on dealing with applications which impact upon Listed Buildings and other buildings of heritage interest and 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.

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.

The proposals as revised would entail demolition on an even greater scale than that previously presented which in turn were greater than envisaged by the allowed hybrid application. Whilst this will now only retain one of the existing buildings on the site, members have seen for themselves the very real difficulties that more significant retention and conversion would entail. Loss on the scale proposed, albeit with a new build which replicates the buildings to be lost, would still need to be balanced against the potential uplift in the number of dwellings that further demolition would enable and the justification presented related to the potential difficulties, both physical and financial that larger scale retention and conversion would engender.

#### 5.5 Density, scale and site layout

London Plan Policy 3.4 requires development to optimise housing output for different locations taking account of local context and character, design principles and public transport capacity.

The proposed uplift in unit numbers will increase the density of development across the site to 35.5 units per hectare. However, this figure is well within the range of 30 – 50 units per hectare for suburban areas set out in Policy DC2. What is more important in this case is the scale and layout proposed in order to achieve that higher density. As members previous identified a key judgement to be made is whether the proposed new build will respect the building to be retained and create a character of development which is not at odds with the rest of the development of the site and/or the openness of the Green Belt.

In terms of layout the proposal to create parallel north/south blocks with private landscaped amenity areas between them maximises the opportunity that their orientation presents to provide an attractive, usable, well-lit and overlooked amenity area.

#### 5.6 Housing mix/affordable housing

Policy DC6 of the LDF and Policies 3.11 and 3.12 of the London Plan seek to maximise affordable housing in major development proposals and Policy DC2 has the objective of delivering 50% of new homes across the Borough as affordable. The Mayor of London Supplementary Planning Guidance “Homes for Londoners” (2017) sets out that where developments propose 35% or more of the development to be affordable at an agreed tenure split, then the



viability of the development need not be tested, this is known as the “Fast Track Route”.

The revised proposals for this part of the site would deliver 3 units less than previously proposed. Although the mix has yet to be fully established it will be focussed on providing 1 and 2 bedroom flats, currently envisaged as 63 no. 1 bedroom, 95 no. 2 bedroom and 4 no 3 bedroom units. As the majority of the rest of the site in Phase 1 will be developed for family housing no objection is likely to be raised to this mix.

The scheme that was approved at appeal for the site would have seen the delivery of 15% affordable housing across the site split 50% : 50% between intermediate and social rented housing. At this stage it is envisaged that the majority of that 15% (44 no units) would be delivered within Phase 1 of the development, currently the subject of reserved matters application P0924.18. Any uplift in the overall number of units on the overall site achieved by the proposals the subject of this pre-application report is proposed to deliver 35% affordable housing, an additional 22 affordable housing units split 64/36 in favour of affordable rent. Staff would seek to ensure that the mix and tenure of the additional affordable housing was in line with the Council’s identified housing need.

#### 5.7 Additional issues

The applicants indicate that car parking has been retained at a level of 1 space per flat and 2 spaces per house. This would be line with the maximum parking standards set out in the LDF but the GLA did express concern on this aspect at the recent pre-application meeting.

London Plan Policies along with Policies DC49 and DC50 of the Development Control Policies DPD requires all major and strategic developments to meet a high standard of sustainable design and construction. Most recently, Policy 5.2 of the London Plan requires residential buildings to be zero carbon. The applicant will be expected to adhere to this policy framework and the Mayor’s energy hierarchy and if unable to achieve zero carbon development a carbon offset payment would be required as part of any S106 legal agreement.

London Plan Policy 3.18 and LDF Policy DC28 support proposals to enhance the provision of educational facilities. All Local Authorities 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. A contribution of £6,000 per dwelling will be sought for all units and would be secured by legal agreement.

## **6 FINANCIAL AND OTHER MITIGATION**

6.1 The proposal would attract the following section 106 contributions to mitigate the impact of the development:

- Up to £948,000 towards education
- Possible carbon offset contribution

6.2 The proposal would attract Mayoral Community Infrastructure Levy contributions to mitigate the impact of the development at a rate of £20 per sqm for all new floorspace.

## **7 OTHER PLANNING ISSUES**

7.1 The proposal is likely to come forward in the next month and a phasing plan will accompany the application to demonstrate that the proposals the subject of this pre-app report would be developed at the same time that the rest of the site was under development.

Discussions are taking place with Hornchurch Aerodrome Society to ensure that a space/building is reserved for a permanent exhibition dedicated to the former RAF Hornchurch.

## **8 Conclusions**

8.1 The development is still in the pre-application stage and has been further developed following the previous meeting and site visit. This presentation is intended to provide Members with a further opportunity to review and offer opinion on the way the scheme has developed and might be further improved prior to the submission of a planning application which will follow shortly.