



**Havering**  
LONDON BOROUGH

# Strategic Planning Committee

## 4 November 2021

<b>Application Reference:</b>	<b>P1039.21</b>
<b>Location:</b>	<b>ST GEORGE'S HOSPITAL SUTTONS LANE</b>
<b>Ward</b>	<b>HACTON</b>
<b>Description:</b>	<b>REDEVELOPMENT OF THE ST GEORGE'S HOSPITAL SITE TO PROVIDE UP TO 4,629SQ.M OF NEW HEALTHCARE FACILITY (USE CLASS E(E)) TO INCLUDE SUB-STATION, GENERATOR, NEW VEHICULAR AND PEDESTRIAN ACCESS FROM SUTTONS LANE, ASSOCIATED CAR PARKING, LANDSCAPE, AND INFRASTRUCTURE WORKS, INVOLVING DEMOLITION OF EXISTING BUILDINGS.</b>
<b>Case Officer:</b>	<b>RAPHAEL ADENEGAN</b>
<b>Reason for Report to Committee:</b>	<ul style="list-style-type: none"><li><b>The application is of strategic importance and therefore must be reported to the Committee.</b></li></ul>

---

## **1 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- 1.1 The application site forms part of the ongoing phased redevelopment of the former St George's Hospital site, granted planning permission in 2017 and 2020.
- 1.2 The principle of redevelopment of the former hospital site has already been established through the granted of planning permission under ref: P0321.15 allowed at appeal under reference APP/B5480/W/16/3153859 dated 13 July 2017: Hybrid application for 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.

- 1.3 The current application follows on from the approval in 2020 of an outline application (P0323.15) for the erection of up to 3,000sq.m new healthcare building on this circa 1.69ha site. This report concerns a detailed planning application for the redevelopment of this former St George's Hospital site to provide a new healthcare facility of up to 4,629sq.m in building extending to three-storeys in height together with associated car and cycle parking, hard and soft landscaping, open space, play space, new vehicular and pedestrian access involving demolition of existing building and structures. This will provide a new health care facility for the local community. This will help secure the additional health care provision needed to support the area's planned growth in population.
- 1.4 The redevelopment of the former St. Georges Hospital site is in three segments. The application site is the northern segment of the three comprising two blocks. The site is currently occupied by old hospital buildings depicting the era that they were constructed albeit considered to have heritage value due to their age and use as a military hospital. The proposed redevelopment of the site would be a positive contribution to this area of Hornchurch bringing a disused site back to use. The loss of the former hospital buildings, though regrettable given their sizes, is considered necessary and harm to heritage assets offset by the public benefits of the proposal. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character.
- 1.5 The principal planning considerations arising from the proposal 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, need for healthcare hub, parking and highway issues, the impact on local amenity and on community infrastructure. The report will also give a detailed review of the proposed development as well as considering the potential impacts, in terms of Green Belt and heritage asset which can be positive or negative, as addressed by the submitted supporting statements.
- 1.6 Officers 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.

## **2 RECOMMENDATION**

- 2.1 That the Committee resolve to GRANT planning permission subject to:
1. agree the reasons for approval as set out in this report, and
  2. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
  3. subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application delegate authority to the Assistant Director Planning in consultation with the Director of Legal Services for the issue of the planning permission and subject to minor amendments to the

conditions or the prior completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers. The Section 106 Agreement Heads of Terms would cover the following matters:

**Section 106 Developer's Contribution for highway safety improvements for:**

- i. A traffic island with internal illuminated bollards in Suttons Lane by the existing entrance to site. Estimate approx. £10k
  - ii. A speed table at the existing toucan crossing at the existing toucan crossing in Suttons Lane by Squadrons Approach. Estimate approx. £15k
  - iii. A traffic island with internal illuminated bollards are installed in Airfield Way, south of Squadrons Approach. Estimate approx. £10k
- Total contribution requested is **£35k**

**Transport and Highways**

- Submission of Travel Plans. The full travel plan should include car and cycle parking monitoring.
- A travel plan bond of £10,000 will be required to be used by the Council to remedy any failure to comply with the terms of the approved travel plan.
- Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan.
- The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.
- Section 278 Highway Works Agreement:
  - a) Service vehicle access
  - b) Main Vehicular entrance

**Community Health Centre Use**

Provision and retention of the specific community health centre use proposed within the scheme, including management and maintenance plan

**Carbon Offset**

Provision of actual carbon emissions and payment of any additional contribution if the on-site carbon reductions stated in the strategy are not achieved - carbon offsetting payment in accordance with Policy SI 2 of the London Plan: Contribution of £217,432 towards carbon reduction programmes within the Borough, duly Indexed.

**Decentralised Energy Networks**

In the event of any future district decentralised energy network becoming available, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide CHP system and the decentralised energy network.

The developer to safeguard a route to be agreed with the Council to enable a connection to any future district decentralised energy network.

### **Legal Costs, Administration, Indexation and Monitoring**

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation (irrespective of whether the planning agreement is completed) and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms (separate from and additional to the Travel Plan Monitoring Fee). All Contributions to be indexed from the date the section 106 agreement is completed to the actual date of payment of the Contribution applying the national all-in tender price index published by the Building Cost Information Service of the Royal Institute of Chartered Surveyors.

- 2.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 31<sup>st</sup> January 2022 the Assistant Director of Planning is delegated authority to refuse planning permission or extend the timeframe to grant approval.
- 2.3 That the Assistant Director Planning is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

### **Conditions**

- 1. Time Limit
- 2. In Accordance With Approved Drawings
- 3. Material Samples
- 4. Landscaping
- 5. Landscape Management Plan (Including biodiversity benefits of the scheme)
- 6. Secured by Design
- 7. Inclusive Access and Wayfinding Strategy
- 8. Window and Balcony Details
- 9. Photovoltaic Panels
- 10. Boundary Treatments
- 11. Water Efficiency
- 12. Energy Statement Compliance
- 13. External Lighting Scheme
- 14. Plant Noise Protection
- 15. Air Quality
- 16. Contaminated Land
- 17. Surface Water Drainage
- 18. Sustainable Drainage Systems (SUDs)
- 19. Maximum 105 litres of water per person per day
- 20. Car Parking Plan
- 21. Disabled Parking Plan
- 22. Electrical Charging Points
- 23. Vehicle Access Prior to Occupation
- 24. Cycle Storage
- 25. Travel Plan
- 26. Demolition, Construction Management and Logistics Plan

27. Construction Hours (8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.)
28. Highway Works
29. Wheel Washing
30. Visibility Splays
31. Fire Brigade Access
32. Detail of Fire Hydrants
33. Refuse and Recycling
34. Site Levels
35. Construction Ecological Management Plan
36. Green/Brown Roof
37. Cooling Demand
38. Construction Waste Management Plan
39. Archaeological Investigation
40. Species Surveys and Mitigation
41. Biodiversity Enhancement
42. Protection of Preserved Trees
43. Restriction of Use
44. Freight Strategy

### **Informatives**

1. Fee required for approval of details
2. Highway approval required
3. Secure by design
4. Street naming and numbering
5. Community Infrastructure Levy (CIL).
6. Planning obligations
7. NPPF positive and proactive.

## **3 SITE AND SURROUNDINGS**

- 3.1 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.
- 3.2 The site is bound to the north by residential houses in Hacton Drive and to the west by Suttons Lane, with residential houses facing the site. To the east and south is the emerging Bellway residential development. Open areas of the Ingrebourne River Valley and Hornchurch Country Park lie beyond. The site extends to 1.69 ha and it is broadly rectangular in shape and relatively flat but does fall from west to east and north to south.
- 3.3 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).

- 3.4 Originally there were two existing vehicular access points to the wider former hospital site, both from the west via Suttons Lane. As a result of the emerging residential development south of the site, there is no existing access point into the site, save for that serving a sub-station in the north-west corner, and which is not proposed to be affected by the development proposals. The western boundary is formed by a low brick wall with railings, with the northern boundary formed by close board fences to the residential rear gardens of existing dwellings in Hacton Drive. The emerging Bellway residential homes abuts the eastern and southern boundaries.
- 3.4 The entirety of the former hospital site was characterised by large institutional blocks (27 in total) within their own or shared landscape, which took a variety of forms – lawns, parking, hard standing, service areas, groups of trees etc. Within the healthcare site are two existing blocks (and part of a third block and extensive lengths of indoor corridors that effectively severed the site, recently demolished). These blocks are one-two storeys with steep pitched roofs, extending to 9.8 and 9.9 metres to their ridge lines – generally equivalent to three storeys of modern residential development. This have since be replaced by residential buildings of varying heights but of similar scale.
- 3.5 The area around the site is predominantly residential in character with a predominance of semi-detached houses and bungalows. The emerging Bellway homes development comprises two-storey houses and 3 and half story residential flatted blocks.
- 3.6 Sutton Lane Major Local Centre is approximately 650m from the site while the Hornchurch Major District Centre is some 1,300m away. The site is located in Flood Zone 1 and has a PTAL score between 0 – 3. An Area Tree Preservation Order protects all of the trees on the site, other than those shown to be removed as part of consented planning permissions or condition discharge.

## **4 PROPOSAL**

### **4.1 Summary of Proposal**

Planning permission is sought for works of demolition and redevelopment. The development can be broken down into a number of key elements:

- A new Health and Wellbeing Hub, providing a number of services for the community, which will be partially relocated from other existing facilities;
- Additional services, not included in the initial brief and the previous outline planning application, which include Renal and Frailty services;
- A new primary (patients / staff / visitors) access point from Suttons Lane into/out of this separately demised healthcare plot, with only an emergency vehicular access point into the residential development;
- A new service access point from Suttons Lane into/out the service area, which is separated from the main vehicular and pedestrian access area, thus ensuring the new traffic loads won't create inconvenience/distress along Suttons Lane;
- A minimum of 15m deep landscape zone along the western boundary, and to Suttons Lane;
- A secured site, with fence / railings around the site boundary. The existing wall and railing along Suttons Lane will be retained.

- Landscape scheme, which will retain the 4 No TPO trees along the frontage to Suttons Lane as well as other trees along the northern boundary and generally any existing hedges and trees where possible for screening and high ecological value;
- Perimeter hedges and enhanced landscaping to all 4 sides of the site, also ensuring privacy to both the healthcare and the surrounding dwellings, existing and new;
- Active and functional façades to face Suttons Lane, ensuring civic presence of the building, and also south towards the residential development and internally over the café courtyard, community garden and rear car park, to create active, well surveilled spaces;
- Integrated community garden;
- Parking spaces for 110 cars and additional 3 spaces for ambulances.
- Pedestrian and cycle dedicated site access, along with secured, well surveilled cycle shelters;
- Potential for St George's Health and Wellbeing Hub to be a net zero carbon scheme.

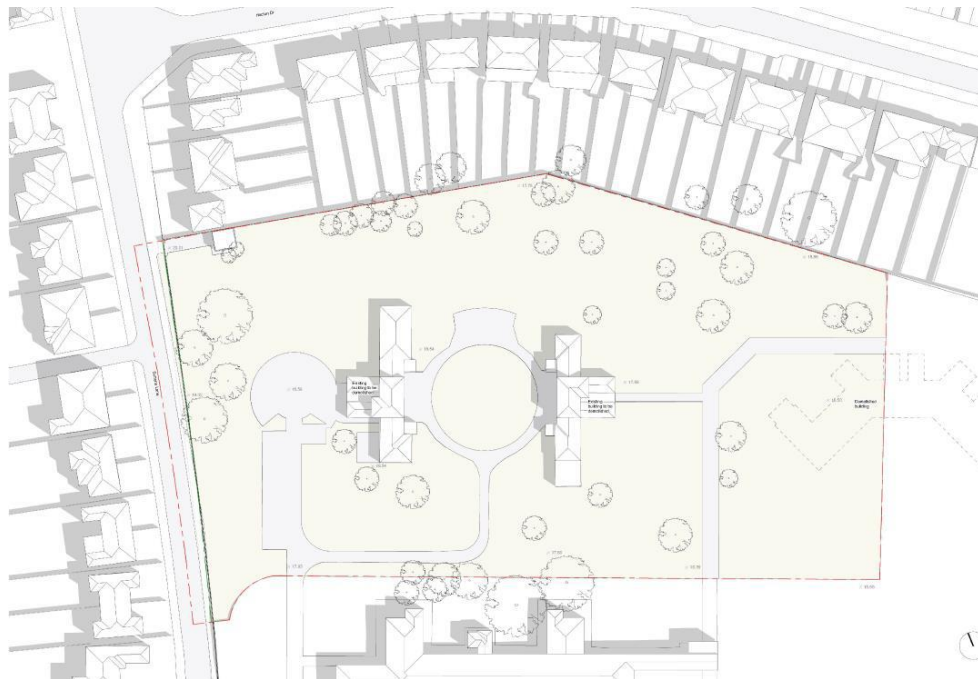


Figure 1 – Existing site plan





Figure 2 – Extant planning permission LPA ref. P0321.15

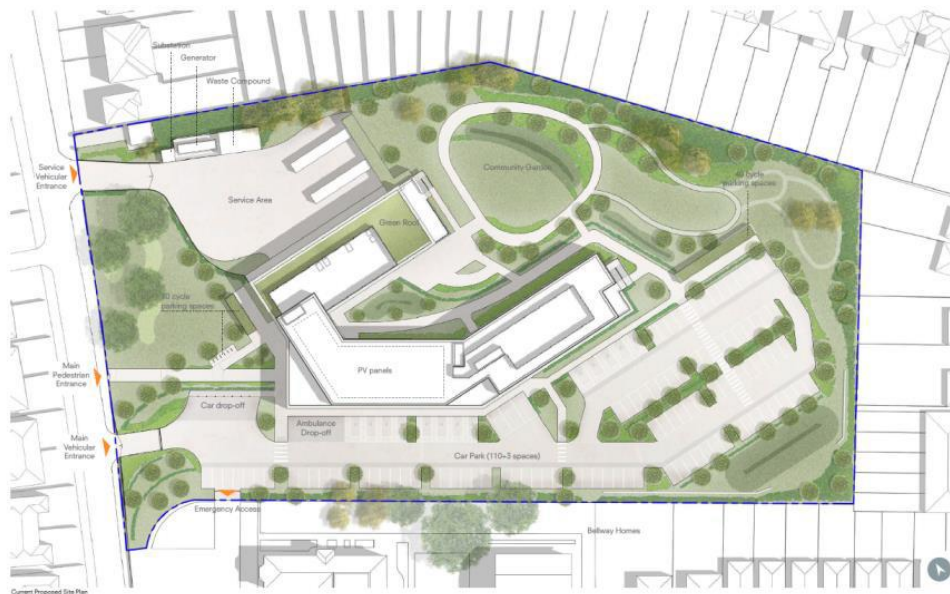


Figure 3 – Proposed site plan

### Detailed Description of Proposed Development

- 4.2 The applicant seeks planning permission for the construction of a new building for E(e) use (formerly D1 Use Class). The building will comprise three storeys above ground, rising to a maximum height of approximately 12.5m, providing up to 4,629m<sup>2</sup> of healthcare use.
- 4.2 The proposal will see the demolition of existing buildings and redevelopment of the former St George's Hospital site to provide a new community health and wellbeing hub, with docking station and vehicle turn around for a cancer and related diagnostic



imaging facilities, inclusive of sub-station and generator, together with construction of new vehicular and pedestrian accesses from Suttons Lane, associated car parking, landscape and infrastructure works.

- 4.3 The proposed building would be set centrally within the site and would have a U-shaped footprint (approximately 2,080sq.m) of between two to three-storeys in height; creating a landscape entrance forecourt and parking area to the south and southeast facing the Bellway Home housing development and landscape courtyard to the east.
- 4.4 The proposed access to the development will be from Suttons Lanes located to the south west of the site. This will be the main vehicular entrance and will provide access to visitors directed to the car park, ambulances and drop off areas This will be gated. A secondary access is provided to the north west corner, and will be dedicated to scanner vehicles, waste collection, service deliveries and mechanical/electrical services maintenance. An emergency access is provided from / to the Bellway development to the south. This is located to the south-west corner of the site and will be in the form of standard FBN 29 (Fire Brigade Note) locked gates for which the emergency services (fire brigade) will have access codes / keys. A total 110 car parking spaces are proposed for staff and visitors, and additional 3 spaces for ambulances. 20% of these are provided with electric car-charging points.
- 4.4 A 9sq.m electricity substation, a 58sq.m generator house and 50sq.m waste storage block (combined footprint of approximately 120sq.m) are proposed to the north end of site in the front close to the proposed service access and set approximately 5.6m from the boundary of houses on Hacton Drive. Due to the sloping nature of the site, the structure will have an average height 2.9m.
- 4.5 The service area which includes CT/MRI vehicle area is located on the northern side of the proposed healthcare building. The CT/MRI area is proposed some 8.6m from the northern boundary. Cycle storage are located to the front and rear area of the site.
- 4.6 The proposed scheme will comprise a new healthcare facility, dedicated car park and a community garden. The healthcare building will provide a number of services such as primary and community care, frailty and renal services,

## **5 PLANNING HISTORY**

- 5.1 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. The following planning decisions are relevant to the application:

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 1.63 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).  
Approved 17 June 2020.

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) Refused 7.Jan 2016.

Approved following planning appeal 13 July 2017 following the refusal of the application (P0321.15) for redevelopment for residential, a revised scheme for residential development was submitted, on a slightly revised site area.

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 (received 09/03/15, revisions and additions received 22/07/15) Approved by 2 June 2016, subject to Stag 2 referral to the GLA and no direction to the contrary from the Mayor of London and negotiation of a S106 Agreement. Following the approval of Application P0321.15 by planning appeal on 13 July 2017, this application was subsequently withdrawn.

P0940.18 - Approval of Reserved Matters (layout, scale, appearance and landscaping) for Phase 1 of the outline part of the redevelopment at St George's Hospital (LPA Ref. P0321.15), comprising the construction of 194 dwellings, new public open space, car parking and associated infrastructure works, and details to satisfy Conditions 1, 8, 22, 23, 25 and 27 of permission ref. P0321.15. - RMA 194 units.

Approved 6 December 2018.

P1917.18 - The Demolition of existing buildings, conversion of the former St George's Hospital Administrative Building and the erection of new buildings to provide 162 residential units (class C3) including car parking, cycle parking, landscaping and associated infrastructure along with the refurbishment of The Suttons Building for use as a Heritage Centre (Class D1). Phase 2 - Approved on 8 July 2020.

### **Pre-Application Discussion**

Prior to the submission of this planning application, the applicant has engaged with LBH planning and design officers over the last 9 months. Officers agree that the site comprises previously developed land and the principle of a healthcare facility development is acceptable subject to the application submission demonstrating that massing, height layout, access and landscaping are acceptable and the impact on the Green Belt is outweighed by the benefit it offers. Officers expressed throughout the pre-application process that the quantum of development, layout arrangement will carry significant weight in the determination of an acceptable proposal.

The design has evolved in order to maintain the level of greenery at the front and rear of the site and create a more suburban form of development to reflect the surrounding character and Green Belt setting. This matter is discussed in the Principle section of the report.

## Summary of QRP Comments and Response from Applicant

QRP Comment	Officer Remark
<p><u>Scale and massing</u></p> <p>The panel welcomes the refinement to the massing that has already occurred, and feels that it is now more sympathetic to its suburban and Green Belt setting. Further refinement, echoing the previous buildings on the site, should aim to create an appropriately suburban form of civic character to the building</p>	<p>The design of the building has evolved and now represents its suburban form and at the same time reflecting the civic character to the building.</p> <p>Refinement can be seen in the final orientation of the building, detailed design of the façade, and the bays, which echo the scale of the previous buildings of St George's Hospital.</p>
<p>The set back of the top storey is successful, but the panel questions whether the continuity of the plant boundary is necessary: removing this would allow for further articulation of the overall massing.</p>	<p>The 2nd floor plant screen across the front elevation / entrance was reduced in height and length in the final submitted scheme, it was also recessed from the front elevation and has a change of material to the main 2nd floor</p>
<p>The visualisations provided shows that the building sits comfortably within the townscape, but the panel would like to see these produced from more angles, including from the National Cycle Route 13.</p>	<p>Additional views from within the site, and within the building, have been produced and included in the DAS, along with a series of views from National Cycle Route 13.</p>
<p>The decision to locate most of the massing to the south of the site is understandable but the impact of this on sunlight and daylight needs to be fully understood, both for the community garden and the internal spaces. A rigorous analysis needs to be undertaken and any adverse impacts mitigated.</p>	<p>A sunlight and daylight analysis and assessment accompany the application, which shows no adverse impact. A series of internal and external images have been produced to demonstrate the High Quality of the spaces created at different times in the year, and the day, which are flooded with light</p>
<p><u>Connectivity and access</u></p> <p>The panel appreciates evident the depth of thought given to cycle and pedestrian access to the site and urges the design team to continue to explore every opportunity to maximise pedestrian connectivity, including the siting of bus stops.</p>	<p>There is a dedicated pedestrian access routes within the site from Suttons Lane. A full Healthy Streets Audit in line with TfL Guidance to identify areas where improvements to the pedestrian routes to and from the site can be made. Agreement has been reached with the Council's Highways Authority for a number of small improvements including pedestrian islands to provide additional crossing points on Suttons Lane and a small raised traffic table at the existing Toucan Crossing close to the site. These measures are all designed to improve pedestrian and cycling connectivity.</p>
<p><u>Layout and public realm</u></p> <p>At present there are no clear walking routes from the car park into the building, with no gap in the landscape to allow access to the rear pathway. This needs to be rectified with clearly legible routes integrated into the landscape design.</p>	<p>TfL Buses are the only authority that can sanction the moving of bus stops and need to review the proposed location before giving their approval. The applicant will have to seek its approval on the grant of permission and is an identified action for the proposed Travel Plan.</p>
<p>The panel understands that specific provision should not be made for smokers, but it feels that this should be anticipated in any case, so as to avoid the inevitable informal gathering of smokers at entrances. This could be achieved by providing sheltered space, not designated as smoking facilities, in less intrusive locations</p>	

<p>The panel is pleased that the cycle store has been relocated to the front of the building, as it is not clear how the rear store would be accessed by visitors. Given the emphasis placed of the sense of arrival at the main entrance, the panel feels that this cycle store should be thought of a part of the landscape, potentially even a small building, rather than simply using an 'off the shelf' product.</p>	<p>Walking routes through the car park have been added. Materiality and colours of paving also indicate the routes.</p> <p>The NHS do not want to provide smoking shelters.</p> <p>The front cycle storage was relocated and reorientated to open up the area in front of the main entrance</p>
<p><u>Landscape</u></p> <p>The community garden could be a valuable resource and the panel feels that the landscape proposals have the potential to create an attractive and successful space. However, the management and maintenance of these spaces will be critical to their success.</p>	<p>A management and maintenance report has been submitted as part of the planning application and there is a summary of this within the Landscape DAS</p>
<p>The panel feels the sequence from landscape to entrance lobby to landscape is a particularly attractive feature of the proposals, which shows that the design team recognises the importance of the patient experience. However, the landscape design proposed for the area immediately outside the rear entrance is not well organised around a view through into the community garden and, given the impact of shading, is more likely to appear as a termination of the vista rather than an invitation through. The design team should consider the landscape on both sides of the entrance lobby with a 3-dimensional appreciation of its role in creating visual connectivity.</p>	<p>The design submitted for planning had taken on these points and the area has been redesigned accordingly, the path has been realigned, replacing trees with specimen shrubs and a raingarden.</p>
<p>The panel is pleased to see the provision of green roofs, but asks that a more bio-diverse alternative to sedum is used.</p>	<p>Sedum has not been proposed, a bio-diverse green roof is proposed instead</p>
<p>The proposed green fencing should be avoided in favour of something better able to blur into the planting.</p>	<p>This has been amended to a 2.1m black vertical bar railing.</p>
<p><u>Architecture and materials</u></p> <p>The approach to fenestration effectively links the interior spaces of the building with the exterior, but the panel asks that the implications for privacy, especially within clinical rooms, are fully explored so that remedial interventions such as curtains and other window coverings are unnecessary.</p>	<p>Privacy is provided via a combination of the following:</p> <ul style="list-style-type: none"> <li>• A green buffer from the external walkways.</li> <li>• Frosted film to windows.</li> <li>• Internal blinds</li> </ul>

The panel feels that the proposed linear red brick is likely to be attractive and will sit well within the local context, but it is less convinced by the proposed metal cladding to the upper storey. The panel urges the design team to focus on creating a simple, calm and elegant architectural treatment for the building using materials such as brick and terracotta tiles that are found in suburban settings such as this, with elaboration of details confined to important elements of the architecture.	Terracotta wall tiles are proposed for the upper storey to ensure it is in keeping with the suburban setting.
--	---

Following previous Pre-App and QRP comments, the design team attended a pre-submission meeting with Council urban design officers to address previous concerns raised. Through this process the design team made updates to improve the quality of the scheme. Urban design officers are satisfied that these updates have created a scheme of acceptable quality that integrates appropriately within the surrounding context.

#### **Summary of SPC Comments and Response from Applicant**

SPC Comment	Applicant Response
The possibility of 'rounding' the corners of the building	This option was tested, however the design team felt that this was not necessary, especially as it would compromise the clinical layouts of affected rooms and proved to be out of context with the surrounding, and historic, setting.
A request that the landscaping/screening to Hacton Drive be decent/robust and have longevity once planted.	You will see from the Landscape scheme that there is extensive new planting along the boundary to the Hacton Drive properties. The landscape management plan ensures longevity for the scheme.
A wish to understand the security measures that would in place on the site.	There is a secured perimeter (fence), CCTV throughout, locked access points out of hours.
Concern that the amount of car parking proposed was not sufficient to ensure that patients have somewhere to park on arrival.	The request for additional parking has been addressed in the parking justification provided as part of the Transport Assessment. That parking justification has been accepted by officers as a robust assessment providing a very little risk of overspill parking into the surrounding streets and takes into consideration the points raised by members in respect of trips from outside of the locality.
A wish to understand the car parking management strategy that would be in place post completion.	Parking Eye system, or similar, will be installed to control and manage the parking on site
Suggestion to investigate an increase to the bus services to the site.	The opportunity to increase bus services to serve the site was considered in detail as part of the originally consented scheme. Capacity analysis tests were undertaken for the existing services and included the significant increase in footfall

	<p>generated by the new residential site and the medical centre. This was done for both the year of opening and for future development year scenarios. In all cases the existing bus service showed significant spare capacity, even at peak times with most of the day being around the 50% mark. Even with the increase in size of the proposed facility the spare capacity still exists although slightly reduced.</p> <p>Whilst the bus companies locally are not adverse to exploring the possibility of providing new or additional services to the site success in doing so will depend on, potential passenger numbers together with financial and long term viability. They would wish to see the medical centre established and fully operational to gauge the level of passenger generation, before taking the matter further. Because of this the matter of improving bus services is part of the Travel Plan Actions for the first and continuing years and as such will be reviewed and discussed with London Buses on a regular basis to test if the viability criteria of new provisions have been met. The appropriate action will then be taken.</p>
Detail assurances on the carbon footprint of the building and a request to incorporate a green roof if possible.	<p>The proposed development has followed the energy hierarchy and has exceeded the minimum requirements in terms of carbon footprint set out by policy. Some key features of the scheme include a fabric first approach, where 15.8% improvement is achieved by energy efficiency alone together with a full electric heating strategy. The full electric heating strategy will enable the scheme to become zero carbon on site in the future and benefit from the decarbonisation of the electricity grid. The scheme is also future proofed from a design perspective and could have the ability to connect to low carbon heat networks if they become available in the area in the future. With the use of renewable technologies including Air Source Heat Pumps and PV panels which have been maximised on the available roof area, the proposed development achieves more than 35% improvement in operational carbon emissions on site exceeding policy requirements.</p> <p>Further to the above, extensive work has been carried out to reduce the embodied carbon of the development. Different materials options have been assessed and two comprehensive whole life carbon assessments have been carried out, one for the purposes of the planning application to meet GLA's benchmark on embodied carbon as well as one for the purposes of securing as many Materials related credits for BREEAM as possible.</p>

## **Community and Stakeholder Engagement**

A Statement of Community Involvement (SCI) accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including leaflets distribution, video and phone calls, public consultation (exhibition) event during the day and evening, engaging with Local Councillors to invite to a preview of the public consultation, writing to local groups, consultation website where all of the exhibition materials could be viewed, questions asked and comments submitted, as well as undertaking one Strategic Planning Committee Developer Presentation.

The applicant's response to the issues raised in the course of the public engagement contained in the SCI is as follows:

- *Too high / too big* - the scheme is part two, part three storeys. The former ward block of the St George's Hospital was the equivalent of four storey residential, whilst the new Bellway apartment blocks are 3 and 4 storeys. The scheme proposals respect both the Hacton Drive residential properties (of two stories with pitched roofs) and the new Bellway apartments.
- *Impacts on Hacton Drive residents* - Further the proposed Hub is a minimum of 21.6 metres from the site boundary and between 34 and approximately 62 metres to neighbouring properties. This is well beyond normal distancing for guidelines for the protection of privacy. There is therefore clearly no risk of loss of privacy arising from the scheme development proposals.
- *Need to ensure there is adequate disabled and pedestrian access* – the site and building will be fully compliant with Part M of the Building Regulations requiring equality of access for all.
- *Should include low energy lighting* – this is included. Details on the sustainability of the building are provided in the Sustainability Statement
- *Noise, waste disposal unit and fumes will impact negatively on residential neighbours* – the operating hours of the mobile scanning units are restricted to typical working day hours, and servicing / deliveries etc will also be planned for the same hours, so will not cause adverse impact to residential amenity. The Noise and Air Quality impact assessments submitted with the application demonstrate that there will not be adverse impacts from the application proposals.
- *Fails to see need for recreational gardens* - the site is of fixed size, and within the Green Belt. There is a requirement under planning policy - and desire of NELFT, the applicant – to respect the Green Belt and keep as much of it open as possible. The landscape and gardens proposed can help with mental health and wellbeing for patients, visitors and staff and are seen as a positive element of the application proposals.



- *Increased housing and increased need* – the scheme proposal is in part a requirement to meet existing shortfalls in healthcare capacity across all services and to meet forecast population growth. The building is designed to be flexible, and so the health bodies are confident it will meet future requirements.
- *Use brownfield sites* – the site is a brownfield site.
- *Use as little green belt as possible / Over-development of Green Belt* - In order to provide modern, fit for purpose buildings with the range of services required based on existing shortfalls in healthcare capacity and to meet forecast population growth, the footprint and floorspace of the scheme has to be.
- *How is it to be secured / managed?* – The site security proposals including boundaries has been developed in full consideration of Secure by Design principles and informed by consultation with NELFTs security manager and the Secure by Design Officer of LBH / Met Police. The proposals include fencing to all sides, in the form of close boarded fencing of at least 2.1 metres height to the boundaries with residential houses to Hacton Drive and the new Bellway houses; and railing to Suttons Lane and the new Bellway apartments. Further, gates for vehicles and any pedestrians in/out of the site will be locked/fobbed out of hours. The vehicle barriers (in addition to gate) to the main vehicular access, will also be ‘controlled access only’ out of hours. Additionally, external CCTV cameras will cover the entrances and exits to the building and the site, defined circulation / access routes around the perimeter of the building, the service yard and car park.
- *Need to protect against anti-social behaviour* – the above approach to design of siting, layout, overlooked parking, open space and landscape, and ensuring there are no hiding spaces have all been design in accordance with of Secure by Design principles. The site being secured out of hours and CCTV coverage should also ensure there are no issues
- *Green space should be adjacent to Hacton Drive* – The new open space is situated to the rear gardens with existing Hacton Drive dwellings and the new Bellway houses.
- *Why should it be community responsibility / How much reliance on local community involvement? / NHS should maintain* – The intention is not for the community to maintain all of the landscape and open space. The maintenance and management of these areas and the site generally will remain with NELFT as the primary occupiers. They will control all works and have budgeted to maintain the landscape. However, NELFT would like the hub to be seen as a community asset and therefore will be encouraging community involvement, including within (if volunteers wish to become involved) the management and maintenance of the community garden. NELFT are talking to local voluntary organisations and the London Borough of Havering’s Community Hub team to further develop this, as with a number of other sites. There is recognised to be both a desire from some members of the community and benefit for patients to undertake some community food growing and landscape gardening works.

- *Café will bring more traffic noise / Should only be used by patients and staff* – the café will serve primarily staff, patients and visitors and potentially provide space for pop-ups for local voluntary groups. A number of patients will be present on site for many hours receiving treatment (i.e., dialysis) so the ability to buy drinks and small snacks / meals is necessary. It is not a commercial café, although NELFT want the hub to be a community asset and therefore will not discourage non staff, patients and visitors from visiting the garden or café. Parking is strictly limited, managed and controlled, the facility is a local asset only so we don't envisage people driving to visit the café. The Friends of St George's Hospital are still in existence and NELFT are discussing with them how we can make this a volunteer run service rather than a commercial venture.
- *Protect the older trees that are currently under threat* - The proposed layout ensures that the 4 category 'A' and B trees on the site frontage are retained, as are most trees on the northern boundary of the site, to the rear gardens of Hacton Drive dwellings. A number of low quality (category C and U) trees need to 14 be removed to facilitate the development scheme albeit these all have limited amenity or biodiversity value, or are otherwise determined to be of limited value, reaching the end of their natural lives or having structural and biological defects. There will be approximately 80-90 new trees planted, the majority of which will be native or pollinator species which will provide biodiversity benefits
- *Engage local residents in caring for trees and to preserve biodiversity* – NELFT welcome the desire of local residents and the local community to become involved in caring for the site. NELFT would like the hub to be seen as a community asset and therefore will be encouraging community involvement, including the management and, if anybody wished to, maintenance of the community garden. We are talking to local voluntary organisations and the London Borough of Havering's Community Hub team to further develop this.
- *Provide mix of trees* - There is a large mix of trees proposed for the site of native and pollinator species, with the pallet of tree planting set out on the submitted planting plans and in the Landscape DAS
- *Include wildflowers* - There is also large mix of shrub and wildflower planting proposed for the site, again mostly of native and pollinator species, with the pallet of such planting set out on the submitted planting plans and in the Landscape DAS
- *Include appropriate bird boxes* - Both bird and bat boxes are proposed to be included in the scheme, with bat boxes on the building and bird nest boxes, including sparrow terraces and house martin boxes. The locations of all are to be confirmed.
- *Need access for disabled, elderly, and pedestrians / More disabled spaces needed* – Planning policy requires 6% of parking spaces to be for disabled persons parking from the outset, and a further 4% for future provision. The

proposals provide 12%, which exceeds the policy requirement for both designated and proposed future enlarged bays

- *Need electric vehicle points* – 20% of the original bays will be laid out as active electric vehicle parking bays; all other spaces will have the ability to be upgraded in the future as demand requires. This accords with policy.
- *Provide cycle spaces* – two areas of covered, secure cycle parking are provided, one at the front of the building and one at the rear for long stay cycles and a further short stay area which in total provides secure cycle parking for 70 cycles. The Cycle parking provision for both short and long stay spaces is provided in accordance with London Plan standards.
- *Need to increase access to public transport / Buses should terminate on site / Station is close by so need to make sure it isn't used by commuters* – The scheme proposals have been developed in full cognisance and accordance with TfLs Healthy Streets Approach and promotes use of sustainable transport options, walking and cycling as the preferred modes of travel to and from the site, rather than relying on travelling by single occupancy private car.
- *Need more car parking / Cars will park in neighbouring residential area* – as above, all staff/patients will be able to choose to walk, cycle or travel by public transport to the site with relative ease and will be encouraged to do so. However, it is recognised there is a need for car parking for all these groups. A detailed analysis of the maximum expected demand has been undertaken, assessing the uses expected to be accommodated and comparable sites. The provision set out meets this expected maximum, based on the known details. Only staff who are essential car users will be allocated parking on-site. Analysis has been undertaken of surrounding roads and there is very little free space for casual / visitor parking, such that those trying to do so will likely find themselves walking greater distances than from the station. Further, a Travel Plan will also be implemented on opening to ensure the
- *Parking free for patients* – NELFT do not currently and do not expect to charge patients for parking at the site. There will be a “parking eye’ type control with patients / visitors required to input their registration number at the reception desk. This will also help enforce against inappropriate park i.e., commuters trying to park at the site.

## **6 CONSULTATION RESPONSE**

### **6.1 Statutory and Non Statutory Consultation**

### **6.2 A summary of the consultation responses received along with the Officer comments**

**Greater London Authority Stage 1 Response** – London Plan policies on Green Belt, social infrastructure, urban design, heritage, sustainable development, noise, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:

- Land use principle: The site is part of a Major Developed Site in Green Belt where limited infill or redevelopment is considered acceptable in principle. The development would increase the built footprint of existing development on the site however, whilst very special circumstances have been demonstrated which could outweigh the limited harm to the Green Belt, further information in this regard is required. The delivery of new healthcare facilities is consistent with the Strategic Outline Case adopted by the NHS and would support the ongoing delivery of primary healthcare to residents in accordance with London Plan Policies S1 and S2,
- Urban design: A revised fire statement and inclusive access statement are required. The development would cause less than substantial harm to non-designated heritage assets. Whilst the public benefits of the proposal could potentially outweigh the harm identified, further information in this regard is required.
- Sustainable development and environmental issues: Further information is required regarding energy, circular economy, whole life carbon, air quality, flooding and drainage.
- Trees and biodiversity: Prior to Stage 2, the applicant should demonstrate opportunities for the development to achieve a biodiversity net gain. The application should confirm any trees proposed for removal, along with an assessment of the value of the trees to be lost and the replacement tree planting strategy.
- Transport: Strategies in relation to car parking and cycle parking should be reviewed. Further information regarding the deliveries and servicing plans are required. Conditions in relation to parking design and management, travel planning, deliveries and servicing, and construction logistics planning should be suitably secured by condition, subject to further consultation with TfL.

### Recommendation

That Havering Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 96. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

### Comments following additional info provided by applicant

Circular Economy – (Info provided after con response) Subject to condition

Green Infrastructure – (Acceptable)

Flood Risk – Generally complies with London Plan 2021 policy SI 12, however, further info relating to the risk of groundwater flooding should be provided.

Sustainable Drainage – Acceptable but some form of rainwater harvesting should be incorporated in line with the London Plan

Air Quality – Comply with policy subject to conditions

TfL – the proposal with 110 surface car parking spaces create a car dominated landscape contrary to the Mayor's Healthy Streets approach due to the combination of parking, access arrangements and the drop off for the proposed hospital, as such,

a significant reduction is sought. The level of long stay cycle parking proposed is supported in line with London Plan policy T5 (Cycling) however under use class D1 a Health Centre should provide 1 long stay cycle parking space per 5 FTE staff and 1 short stay cycle parking space per 3 FTE staff. Given that section 2.7.6 of the DAS states there may be up to 318 FTE staff the level of short stay cycle parking proposed needs to be increased to 106 spaces in order to comply with London Plan T5 (Cycling) minimum standards. Similarly, the location of the long stay cycle parking store is not LCDS compliant.

**Historic England (GLASS)** – No objection subject to archaeological condition(s) and informative.

**Thames Water** – No objection in terms of surface water drainage, waste water network and sewage treatment. Water supply comes within the area of Essex and Suffolk Water Company.

**Anglian Water** – We have no comment.

**National Grid (Cadent)** – Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified. Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.

**Natural England GLASS-** No objection subject to archaeological condition(s) and informative

**LBH Lead Local Flood Authority** – No comment

**LBH Heritage Consultant**– I am unable to support the application. Object to loss of the building.

**LBH Ecology Consultant**

**LBH Landscaping Consultant** –The scheme proposed is supported and the landscape-led masterplan is welcome, subject to recommended condition.

**London Fire Brigade** – No further observation to make.

**Designing Out Crime Officer** – No objection subject to condition

**LBH Waste Management** – the business should have a suitable waste collection/contract to meet the requirements

**LBH Environmental Health (Noise)** – I recommend refusal on noise ground unless suggested conditions can be attached and enforced.

**LBH Highways** - Highway engineers have examined Design and Access statement, Logistics Plans, Travel Plan and Delivery and Service Management Plan as submitted in May 2021 in respect with the above planning application.

1. Provision for car parking: Reference is made to Design and Access Statement on parking. Whilst the London Plan considers reduction in car parking, however, Havering as an outer borough has high car ownership. Based on the LBH parking design guide, the level of parking proposed of 110 car parking spaces is adequate not to create any parking stress in the locality.

2. Provision of cycle parking: Reference is made to the Design and Access Statement. Provision of cycle parking is adequate but further clarity is required on the proposed parking arrangements.

3. Logistics plan for construction and general traffic: Officers have examined the proposed Logistics Travel Plan produced by Transport Planning Consultants of May 2021 (ver 003) for the construction traffic and below are our comments:

The suggested routes for construction and general traffic have been checked on plans on pages, 17/25 and 19/25. It has been noted that deliveries and construction (red route) traffic must follow the route via Suttons Lane to A1306, whereas the general traffic (green route) can follow the route via Hornchurch and other routes. The above routes are acceptable.

LBH would require the following to be including in the Planning Conditions if the above planning application is approved.

LBH would also expect some advance warning signs are installed on both approaches of the gates displaying Construction traffic turning ahead.

i) The Logistics Plan states that the site will be surrounded by hoarding to control noise, vibration and dust emissions. The hoarding must also display the contact telephone in case of any unexpected emergency arising during out of hours.

ii) Cleanliness of roads. It is suggested to include in the Planning Conditions that the road around the site is cleaned regularly of any fallen mud or debris. In addition and Method Statement would be required about wheel washing facilities on site.

4. Travel Plan: The Travel Plan by Transport Planning Consultants Ltd has been examined and reference is made to item 3, Plan Administration.3.1 states *'prior to occupation the developer will appoint a Travel Plan Co-ordinator to implement the travel Plan for 5 years. The names and contact of this individual will be made available to all staff, visitors and LBH Travel Plan officer for effective communication.*

LBH response: The case officer dealing with the planning application must include a Planning Condition that the above is carried out as outlined in their statement if the planning application is approved.

5. Delivery and Servicing Management Plan: Officers have checked the delivery and servicing management plan produced by Transport Planning Consultants Ltd, May 2021 (ver 02). Item 3.1, Servicing Trips states that *'generally, most deliveries will take place outside the peak periods.... '*

LBH response. It is important to bear in mind that there are residents residing in Hacton Drive will be disturbed if the deliveries are made out of working hours.

6. **Section 278 Highways Agreement.** The applicant/developer will be required to enter into s278 highways Agreements for both entrances as below:

- c) Service vehicle access
- d) Main Vehicular entrance

The developer must provide an estimate of the works upon which the S278 Highways Agreement will be based.

Further clarity is required if the above accesses will allow traffic both inbound and exit.

Road Safety Audit, stage 1 would be required for the new accesses and recommendations acted upon.

The Design and Access Statement shows that there will be a pedestrian site access which will accommodate both pedestrians and cyclists. When this is constructed and connected to the existing footway of Suttons Lane (east side) the contractor must ensure that any disturbed area on the public footway is reconstructed to good standard and workmanship.

7. **Section 106 Developer's Contribution for highway safety improvements**  
Given the level of trip generation and attractions, Suttons Lane and Airfield Way have speed related issues and given the close proximity of Saunders Drapers School, Suttons Primary School and Fledgelings Day Nursery in Hacton Drive. As a result, it is suggested that the following road safety measures are installed:

- i) A traffic island with internal illuminated bollards in Suttons Lane by the existing entrance to site. Estimate approx. £10k
- ii) A speed table at the existing toucan crossing at the existing toucan crossing in Suttons Lane by Squadrons Approach. Estimate approx. £15k
- iii) A traffic island with internal illuminated bollards are installed in Airfield Way, south of Squadrons Approach. Estimate approx. £10k

Total contribution requested is **£35k**.

## **8 LOCAL REPRESENTATION**

- 8.1 The application was advertised via a Press Notice and Site Notice displayed at the site for 21 days.
- 8.2 A total of 158 consultation letters were sent to neighbouring properties regarding this application.
- 8.3 12 representations (9 objection, 1 comment with condition, 1 support and 1 comment) have been received.



## **Representations**

- 8.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

### **Objections**

- i. The proposal is too large compared to the scheme approved;
- ii. Waste generated will be considerably large particular with the café use;
- iii. Too high at 14m height – far exceeds the original proposal;
- iv. Loss of privacy (view into our garden) from the large windows
- v. Concerned about the level traffic to be generated as a result;
- vi. Not enough parking facility;
- vii. The building height will cause loss of light & sunlight to gardens & into our homes due to the extra floor added for mechanical equipment & metal fencing.
- viii. The plan MRI/CT units – the noise from these would be a statutory nuisance affecting the quality of life of the residents living in Hacton Drive.
- ix. Concerned about the building on green belt and building on the floodplain.
- x. Object to the position if the vehicle exit. It's a busy road and the exit will be close to the homes on Suttons Lane, including mine. The exit should be diverted through the new estate on the flat and use the old hospital exit.
- xi. The proposal will affect the quality of life of my Autistic son due to its location close to our garden which he enjoys using and a form of therapy to calm him ;
- xii. The flood attenuation measures is not sufficient;
- xiii. The proposed Hub is no longer just GP services but include mental health and child services
- xiv. The use of standby generator will increase pollution and noise nuisance in the area

### **Comment with condition**

- xv. I am for a development that has a positive impact, such as this regional hub that offers vital services. As a resident whose garden backs onto the development I have reservations in several areas I would like addressed. The café should be repositioned to minimise smell getting to my property. Restrict hours of time for vehicles using the service entrance to Mon – Fri 9am – 5pm. My garden will be a prison block view of a sea of red bricks for as far as my sight of vision. I strongly object to a 14-meter brick wall when there is space to build a lower-level building.
- xvi. Limited parking onsite, will mean the already busy road of Hacton Drive will become a hub for alternative parking, give us free permit parking for our road for 10 years. Noise - placement of generators and MRI units need to be placed as far away from the gardens of Hacton Drive

### **Comment**

- xvii. I cannot see if there is going to be a fee to park in the new facility, if there is the parking in Hacton drive will get worse.
- xviii. Traffic lights near the entrances to let people in and out should be considered to mitigate bottlenecks in the vicinity of the site;

Officer comment: The issues raised are addressed in the context of the report.

## **9 Relevant Policies**

9.1 The following planning policies are material considerations for the assessment of the application:

### National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) sets out Government planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Themes relevant to this proposal are:

- 2 - Achieving sustainable development
- 8 - Promoting healthy and safe communities
- 9 - Promoting sustainable transport
- 11 - Making effective use of land
- 12 - Achieving well-designed places
- 13 - Protecting Green Belt land
- 14 - Meeting the challenge of climate change, flooding and coastal change
- 15 - Conserving and enhancing the natural environment
- 16 - Conserving and enhancing the historic environment

### London Plan 2021

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D7 Accessible housing
- D8 Public realm
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- G1 Green infrastructure
- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- G2 London's Green Belt
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G9 Geodiversity
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk

- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood risk management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
  - T6.5 Non-residential disabled persons parking
  - T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
  - DF1 Delivery of the Plan and Planning Obligations

#### Sustainable Design and Construction (2014)

This SPG contains advice on natural resource management, climate change adaptation and pollution management. It reinforces similar policies contained within national and local planning policy.

#### Character and Context SPG (2014)

This document sets out the principles of site responsive design that should inform the Design and Access Statement to be submitted with the application, helping to promote the right development in the right place.

#### Accessible London SPG

This and the document Design and Access Statements: How to write, read and use them (Design Council, 2006) guidance from Design Council CABE will also help to inform preparation of the Design and Access Statement needed to accompany the application.

#### Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document (2008)

The following policies are considered relevant to the proposed development:

- CP2 - Sustainable Communities
- CP8 - Community facilities
- CP9 - Reducing the need to travel
- CP10 - Sustainable transport
- CP15 - Environmental Management
- CP16 – Biodiversity and geodiversity
- CP17 - Design
- DC21 Major developments and open space, recreation and leisure facilities
  - DC5 – Specialist Accommodation
  - DC26 – Location of community facilities
  - DC27 – Provision of Community Facilities
- DC32 - The Road Network
- DC33 - Car Parking
- DC34 - Walking

- . DC35 - Cycling
- . DC36 – Servicing
- 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
- DC60 - Trees and Woodland
- . DC61 - Urban Design
- . DC63 - Delivering Safer Places
- DC62 - Access
- DC66 - Public Realm
- DC 67 – Buildings of Heritage Interest
- DC70 – Archaeology and ancient monuments
- DC72 – Planning obligations

#### Havering Emerging Local Plan (2018)

The following policies should inform design of the proposed development:

- .. 12 - Healthy communities
- 16 - Social Infrastructure
- . 23 - Transport connections
- . 24 - Parking provision and design
- . 26 - Urban design
- . 27 - Landscaping
- . 29 - Green infrastructure
- . 30 - Nature conservation
- . 33 - Air quality
- . 34 - Managing pollution
- . 35 - On-site waste management
- . 36 - Low carbon design, decentralised energy and renewable energy

#### Havering Supplementary Planning Documents (SPDs)

Aspects of the following documents apply to the proposed development though need to be read in combination with newer mayoral guidance:

- Sustainable Design and Construction (2009)

## 10 **MATERIAL PLANNING CONSIDERATIONS**

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

- Principle of Development
- Green Belt Considerations
- Design, character and setting of the building
- Impact on the residential amenity of neighbouring occupiers
- Heritage Issues

- Access, the impact on the highway network and parking provision
- Accessibility
- Flood Risk and Development
- Sustainability
- Air Quality
- Archaeology and Contamination
- Ecology / Greening and Biodiversity
- Statement of Community Involvement
- Financial and Other Mitigation
- Other Planning Issues

## 10.2 **Principle of Development**

10.2.1 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 149 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.

10.2.3 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.

10.2.4 The site-specific allocation supports the site's redevelopment for residential and community uses. Redevelopment of the site is therefore supported at national, regional and local level so long as it has 'no greater impact upon the openness of the Green Belt than existing'.

### Loss of Hospital Buildings

10.2.5 The principle of redevelopment of the former hospital site has already been established through the grant of planning permission under ref: P0321.15 allowed at appeal under reference APP/B5480/W/16/3153859 dated 13 July 2017 and the outline permission for a new 3,000sq.m health facility on the application site under ref. P0323.15 dated 17 June 2020. The scheme allowed under appeal involved 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. Phase 1 of the approved hybrid scheme (now under construction) involved demolition of some hospital buildings, while Phase 2 involved conversion of six blocks into flats. The Phase 2 of the permission involves the demolition of five of the six buildings shown to be retained to provide 162 residential

apartments an uplift of 66 additional units from the hybrid scheme. Demolition works have since commenced for the Phase 2 scheme.

- 10.2.6 As outlined earlier in this report, former St. George's Hospital site is being redeveloped. 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 ongoing and the determining of the current planning applications is an important and intrinsic part of that process. Officers 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, as it is consistent with the aims of the emerging Local Plan Policies 12, London Plan Policies S1, S2 and the NPPF to promoting healthy and safe communities.
- 10.2.7 However, the scale of redevelopment proposed is greater than the existing development and that of the consented healthcare scheme such that the scheme proposals do have a greater impact on the Green Belt than the existing and consented developments, and as such it is considered that very special circumstances are required to be demonstrated.
- 10.2.8 Accordingly, subject to meeting the criteria for suitable Green Belt development set out in the NPPF and the relevant policies of the LDF where these have not been effectively superseded, the principle of the redevelopment of the site for health care purposes is supported.

### 10.3 **Green Belt Considerations**

- 10.3.1 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. The entirety of the former St George's Hospital site is and was characterised by large buildings and extensive hard surface areas, within a grassed / landscaped setting respectively.
- 10.3.2 Paragraph 147 of the National Planning Policy Framework (the NPPF) states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF indicates at paragraph 149 that the construction of new buildings should be regarded as inappropriate in the Green Belt unless they fall within certain specified exceptions including *"limited infilling or the partial or complete redevelopment of previously developed land, whether in redundant or continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development"*. Whilst this exception is not reflected in the adopted Local Plan, it represents up to date Government policy and is therefore a material consideration that carries substantial weight.
- 10.3.3 However, as set out above, 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.

10.3.4 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 permitted outline scheme, the existing hospital layout, its buildings and hard surfaces. The layout and design approach with defining matters such as development envelopes, building heights, 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 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.

10.3.5 It is apparent, however, that two conditions must be met in order for development to meet the specified exception. Proposals must not *“have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”*. These tests are considered below.

#### Impact on Openness

10.3.6 It is necessary to consider whether the proposed development would have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Paragraph 137 of the NPPF highlights *“the essential characteristics of Green Belts are their openness and their permanence”*. There is no definition of openness in the NPPF but, in the context of the Green Belt, it is generally held to refer to freedom from, or the absence of, development. Any above ground development would to some extent diminish the openness of the Green Belt.

10.3.7 The National Planning Practice Guidance (NPPG) (Paragraph: 001 Reference ID: 64-001-20190722) sets out that, *“assessing the impact of a proposal on the openness of the Green Belt, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.”*



10.3.8 The extent of the development retained on the healthcare site is 1,703sq.m, with 2,524sq.m of hardstanding equating to a built envelope (footprint and hardstanding) of 4,227sq.m, accounting for 26% of the 1.64 hectare site. According to the submitted Design and Access Statement, the proposed development would result in a built envelope of 48% of the 1.64 hectare site. It is apparent from the existing and proposed developments that the form and extent of built development will change as a result of these proposals. Whilst the total volume will be increased, the form of development will be different to the existing situation, especially in terms of removing the two existing buildings (and partial and corridor buildings already demolished) the latter of which fragmented the space both visually and physically and replacing these with a single, modern healthcare building. Although the site forms part of already developed land that has a clear separation from the countryside, and whilst the site's designation as major developed land is noted, the extent of built development would increase as a result of the proposal and be concentrated in a single location which would demonstrably result in a greater impact on the openness of the Green Belt.

10.3.9 Notwithstanding the above, it is acknowledged that openness goes beyond physical presence and that the visual sense of openness is a qualitative judgement pertaining to the whole, including disposition of building, footprint, height, bulk, mass, roofscape, landscape and topography. Officers are of the view that whilst the quality of landscaping in the area would have a beneficial effect upon openness of the Green Belt, the benefits would not outweigh the harm, the proposal in its totality, would have to the openness of the Green Belt. It is considered that the massing, bulk and scale of the proposed building would result in an increase in the built up appearance of the site, particularly when viewed from the open land to the east and the street from the west, resulting in a reduction in the openness of the Green Belt, and as such the proposals would not fall within paragraph 149g and they must be considered inappropriate development on the Green Belt which is harmful by definition. It is therefore necessary to demonstrate that very special circumstances exist in order for the development to be considered acceptable.

*Very Special Circumstances (VSC)*

10.3.10 The NPPF is clear at paragraph 148 that when considering applications on the Green Belt, substantial weight should be given to any harm to Green Belt and that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

10.3.11 The applicant has acknowledged that the proposed development would be inappropriate and does not meet any of the exception tests of the NPPF. The applicant has therefore set out very special circumstances that it contends would outweigh the harm to the Green Belt as follows:

- i. address the 'social determinants of health' and better meet current and future wellbeing, primary care, community and social care currently unmet needs of the local population, to ease current and future pressure at Queens Hospital Accident and Emergency Department;

- ii. benefit the community by averting system failure in local General Practice with a high quality, purpose-built facility to accommodate at least 15,000 patients by 2022 and 20,000 patients by 2028;
- iii. the creation of space that allows for the consolidation of existing fragmented services from Queen's Hospital, including Community Renal Dialysis and some outpatient services, to relocate to more appropriate, flexible and compliant facilities, in the community, in line with the BHRUT Clinical Services Strategy;
- iv. provide accommodation to increase Early Cancer Diagnostic capacity to meet new Cancer targets set in the NHS Long Term Plan and to support the Macmillan 'Living With, and Beyond, Cancer' programme;
- v. promoting the effective use of previously developed land; and
- vi. a lack of alternative sites and appropriateness of formal hospital site for continued social infrastructure.

10.3.12 Furthermore, the applicant also contends that the existing site is significantly limited in its overall contribution to the openness of the Green Belt, following the redevelopment of the land on the eastern and southern boundaries for residential development which effectively encloses the site on all sides and objectively, the site does not serve any of the five purposes of Green Belt identified in paragraph 138 of the NPPF. Thus, the applicant contends that the very special circumstances it identifies, individually and cumulatively justify the development within Green Belt.

Officers' comment of the VSC

10.3.13 Officers have assessed the very special circumstances set out by the applicant including the alternative sites search analysis, and, as set out below, in this instance, consider that very special circumstances relating to the re-provision, consolidation and improvement of healthcare facilities on a former hospital site do exist. The applicant has provided additional technical information and strategic issues raised in the GLA's Stage 1 response, which have been found to be satisfactory.

10.3.14 Policy S1 of the London Plan and Policy DC27 of the Local Plan set out that development proposals that seek to make the best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. Policy S2 of the London Plan and Policy DC26 supports the provision of high-quality new and enhanced health and social care facilities, and also notes that in assessing the need for new health and social care facilities, consideration should be given to the co-location of facilities with other uses such as housing to use land more efficiently and to enable a more integrated service delivery. London Plan Policy S1G states that redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan.

10.3.15 Boroughs are required to work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to identify opportunities to make better use

of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. Whilst the proposed development would result in loss of the two vacant hospital blocks associated with the former hospital which the Council determined the existing lawful use to be Class C2. Outline Case was made for redevelopment of part of the site for a new health facility, with the remainder being surplus to requirements. This was undertaken and approved by Havering Clinical Commissioning Group, NHS North East London and the City (NELC) PCT Cluster Board in 2012/13. This decision received final approval from NHS London and finally NHS England in 2014.

- 10.3.19 A detailed clinical business case was made by the Clinical Commissioning Group for the development of the new health facility resulting in an outline planning permission (P0323.15) in June 2020. The site area put aside for the new healthcare facility was determined to be the maximum required for the needs of the NHS in the local area. Given that the hospital is no longer in use and was considered surplus to requirements, the loss of the remaining hospital blocks are considered acceptable having regard to the London Plan Policy S1, particularly in light of the new facilities the current application proposes.
- 10.3.17 Policy CP14 of the Local Plan identifies four major developed sites remaining within the Green Belt in Havering where limited infilling or redevelopment is considered acceptable in principle, of which the application site is one. Also a new health facilities on this site have been identified within the emerging Local Plan as a key feature of the spatial strategy for social infrastructure.
- 10.3.18 Whilst the proposal would result in an increase of 415% in floor area compared to existing and by 64% compared to that of the extant outline permission, officers accept the rationale for demolishing the outdated buildings to provide new, fit for purpose medical services floorspace and facilities to meet current and future population needs, which would sustain and improve NHS services into the future, and note the Council's spatial strategy in the emerging Local Plan to support the site's transformation programme.
- 10.3.19 In its Stage 1 response, the GLA has advised that the specific community health centre use proposed within the scheme should be secured as part of any planning permission, along with drawings to control building heights and built footprint of the proposed health centre. The provision of a management and maintenance plan for this space should be secured through a S106 agreement to ensure the operation of the proposed community use is compatible with the proposed residential uses, so the quality of the proposed community space is maintained for the lifetime of the development in accordance with Policy S1 of the Mayor's London Plan. This has been included in the recommended Head of Terms.

#### *Conclusion*

- 10.3.20 Based on the forgoing and having regard to the fact that there is no presumption against the loss of the existing facility, the NPPF presumption in favour of sustainable development, the weight accorded the very special circumstances case put forward in support of the application and taking into consideration that the site is regarded as previously developed land, the proposed redevelopment of the site to

provide a healthcare facility is considered to be acceptable within this Green Belt site. On this basis, the proposal is considered to be acceptable in principle with regard to the above stated policies.

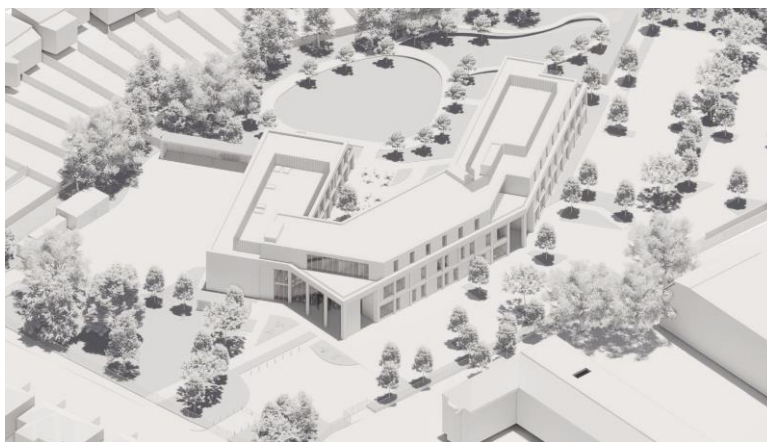
- 10.3.21 Notwithstanding the acceptability of the principle, the proposal would be subject to all other material planning considerations, in particular, harm that will be caused to the character of this former military hospital site and its locality as a result of the demolition of this heritage assets in addition to those already demolished in Phases 1 and 2, which are explored further in the report below.

#### 10.4 **Design, character and setting of the building**

- 10.4.1 The NPPF 2021 attaches great importance to the design of the built environment. Paragraph 126 states *'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*
- 10.4.2 The NPPF states (paragraph 134) that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents". Paragraph 133 states that 'applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community' and this is reinforced in London Plan Policy D2, which seeks the involvement of local communities and stakeholders in the planning of large developments.
- 10.3.3 Policies D3 and D4 of the London Plan require that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion, appearance, shape and form. This is echoed in Policy DC61 of the LDF and Policy 26 of the emerging Local Plan,
- 10.3.4 Core Strategy policy CP17 states that new development to 'maintain or improve the character and appearance of the local area in its scale and design'. Core Strategy 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. Development must therefore: respond to distinctive local building forms and patterns of development and respect the scale, massing and height of the surrounding physical context.' These policies are expanded upon in the Council's Supplementary Design Document (SDD) which requires the impact of a development to be assessed giving regard to the bulk, scale and design of the proposal and how it harmonises with the existing building and area.
- 10.3.5 The scheme before the Council has been developed through detailed pre-application discussions held with Officers and Quality Review Panel, as well as members of the Strategic Planning Committee. In this regard, the scheme has adopted a design-led approach, including consideration of numerous design options to determine the most

appropriate form of development that responds to a site's residential and Green Belt context and local character, scale and density of development.

- 10.3.6 The accompanying Design and Access Statement provides a detailed description of the proposals and demonstrates that the proposed development can be satisfactorily accommodated across the site given the surrounding context.
- 10.3.7 The new healthcare building will be a substantial intervention into the local townscape and, particularly in views from the north and south approaching the site from Suttons Lane, will appear as a very prominent landmark for the former St Georges Hospital site. Given its size and position in the context of the site and immediate surroundings, the new building is very much one that will be capable of being viewed in the round, i.e. it doesn't really have a rear façade



Model – Aerial view from South-west



Model – Aerial view from North-east



View from the Main Entrance



View from the Garden Entrance

- 10.3.8 The scheme proposes a varied palette of high quality traditional materials combined with a contemporary form of detailing, which would create a well-articulated and visually interesting building of an appropriately high standard for this location. The external wall treatment comprises a range of brick finishes, including textured detailing, deep set reveals. In terms of the façade treatment and architectural approach, the building has been designed to broadly express a base, middle and top and in its façade treatment has sought both to mitigate the building's height and mass, as well as bring a dynamic articulation to the facades to provide both relief and visual interest suggesting the welcoming nature of the scheme.. Proposed materials appear positive, but further information will be requested given heritage/green belt sensitivities and the innovative modular system. Notwithstanding the information submitted with this application, a planning condition requiring the approval of materials would be appropriate to ensure that the detailed design of the proposed building can be properly assessed and agreed.
- 10.3.9 The ground floor of the building will be punctuated by a wide opening running through the building. Rising through the centre of the building and visible when walking through the ground floor entrance space will be an open atrium, which will further add



to the dynamic qualities of the design. The main atrium of the Hub is accessible from both the front and the garden entrances, and has a generous waiting area with two double height spaces in correspondence of each entrance. From the atrium space, patients and visitors will be able to access the upper floors by the lifts and stairs off the waiting area. They will also be able to access the cafe area located at the end of the northern block, as well as Primary Care in the northern block and Community and Diagnostics departments located in the southern block. A small reception area is provided in proximity of both the Primary Care and Diagnostics entrances. A separate entrance is provided to access the Frailty service located at the ground floor of Block 3. This entrance will also be used by patients and visitors to access the Renal department at second floor, and by staff members to access the admin office located at first floor level. From the cafe area, all users will be able to access the community garden located at the heart of the site and open to the community during the Hub's working hours. The intention of this dramatic entry point and these other ground floor functions is aimed at creating an active and animated ground floor experience.

- 10.3.10 The first floor waiting area is accessible by lift or stairs from the main atrium, and is visually connected to both entrances by two double height spaces and to the community garden by a glazed facade. Similarly to the ground floor, public toilets are located to the back of the atrium lifts and a reception is provided at the entrance of the Community service located on the northern block. This block also accommodates some administration spaces, as well as a terrace overlooking the rear garden, which is accessible by staff, patients and visitors of the Hub. Minor Ops and Acute services are positioned centrally to the floor, whilst the eastern block is fully dedicated to administration and staff areas.
- 10.3.11 The top floor is fully dedicated to the Renal services, accessible by visitors via the stair and lift block located at the ground floor by the Frailty entrance. A reception, waiting area and terrace are located in the central block, where patients will be able to wait whilst being able to look at the outside space facing the southern area of the site. To the east of this waiting area is the dialysis treatment area. To the west a number of staff and admin dedicated areas are located to support the renal service operations. A terrace dedicated to the Renal staff overlooking the main entrance is also provided. Staff members will also be able to access this area directly from the main atrium via the Block 1 lifts, which will have access controlled to ensure separation of patients and staff flows. The Block 1 plantroom is also accessible from this floor, whilst the top roof level is accessible via the central block stair core. On the central roof a second plantroom is located, servicing the eastern part of the building, as well as PV panels.
- 10.3.12 The roof will feature an area of green roof, solar panels and mechanical plant area. The new 3 storey building will rise to a height of approximately 12.5m. The applicant has advised that the plant height is expected to be up to 3.34m while the metal louvered screen, which will have the louvres aligned vertically will be up to 3.39m lower than the 4.05m building floor height. While the 3.4m rooftop plant would make the building appear disproportionately large on a 2/3 storey building, a concern which is echoed in the neighbours' representation, it is noted that Outline planning permission (OPP) was consented to be up to 3-storeys in height. Heights in metres for the building weren't fixed in the proposal nor the OPP, and the details of plant weren't known at that time so weren't specified. It could therefore be said that the



new building is not higher than that already consented in principle. And although it will add to the overall height, the plant space is not classed as an additional storey, as it is not enclosed. It also is set back from the building edge and does not extend the full length or width of the building.

- 10.3.9 The building features a strong and clear public entrance which will ensure that the building delivers a legible form. In terms of its scale and massing the proposed development represents an efficient use of the land whilst still sitting comfortably within the site. It is considered that the building's design, scale and massing and site layout would result in a scheme which reflects the locality and the function of the building without resulting in an overly dominant form of development when viewed from surrounding public vantage points.
- 10.3.10 The proposal has also been considered against Local Plan Policy DC61 and Policy 27 of the emerging Local Plan require landscaping to form an integral part of the overall design. Landscaping can protect and enhance the existing visual character of the area and reduce the visual and environmental impacts of a development. In this case, a landscaping scheme is proposed for the site, which should assist in setting the development within the context of its wider surroundings and further act to soften the scale and visual impact of the building.
- 10.3.11 Applicants were responsive to officers' comments to provide generous planting to the front and rear of the site to help the increased volume integrate with the surroundings. A detailed and well-considered landscape strategy provides high quality amenity for patients and staff, as well providing sustainable drainage, ecological enhancement, and screening to neighbouring properties. The quantity of parking and scale of boundary fences to front negatively impact the quality of the scheme, but were justified as part of the Pre-App process.
- 10.3.12 The Council's Landscape advisor has confirmed that the submitted Design and Access Statement (DAS) and Landscape DAS provided a detailed site analysis that demonstrates how the scheme has developed throughout the pre-application process; that the scheme has retained existing vegetation that is of good quality and has been sympathetic to its residential context by providing sufficient landscape corridors on site boundaries. And that overall, the proposed scheme is supported and welcome the landscape-led masterplan.
- 10.3.13 The Landscape DAS clearly identifies the existing vegetation to be retained and protected and justifies proposed removals. The proposed scheme has sought to reinstate and enhance the remaining trees with the addition of new tree planting to screen along boundaries and provide amenity and ecological enhancement throughout the site. The proposed level of tree planting is welcomed and, subject to further details coming forward regarding species and installation size, the provision is considered to be sufficient.
- 10.3.14 The general arrangement of the site is acceptable, however, the schedule of species needs minor amendments. Some identified species are inappropriate for their allotted locations due to their natural growth form. Also amenity grass mixes will have to be avoided. Instead, the Landscape Advisor recommend that flowering lawns are proposed; they provide visual interest, improve biodiversity value, establish quickly

and are easy to maintain long-term. Proposed trees should be planted at a variety of sizes depending on whether they are pioneering or successional species. These are minor amendments which can be resolved through a condition requiring a detailed landscaping scheme to be approved.

- 10.3.15 The proposals also recognise that accessible and functional outside amenity areas will be very important to the health and wellbeing of staff, patient and patrons of the facility. To this end, the garden has been designed to include several distinctly separate areas, which have various functions, situated along a footpath to the inside-rear and rear building. This layout is designed to encourage users to walk alongside and touch, see and smell the plants, with raised planters, which are to be designed and specified in such a way as to be wheelchair accessible; accessing straight from inside and outside A café terrace area would acts as the focal point and destination with seating areas. Lawns are to be planted with a variety of tree species and wildflower area with informal mown path to act as a mini parkland. Benches would be provided at various locations to enjoy different aspects of the garden in sunshine and shade.
- 10.3.16 The external areas at the front of the proposed building would have planting beds, mixed hedges and ornamental shrub planting and trees designed to provide an attractive entrance and to soften the visual impact of the car park.
- 10.3.17 On balance, it is considered that the proposals accord with the Urban Design Principles of the stated policies and will assist in the overall aim of creating a high quality environment, establishment of a much needed health and wellbeing hub and the creation of employment opportunities in the area. The proposal also accords with the stated national, London and local plan policies.

10.4 **Impact on the residential amenity of neighbouring occupiers**

- 10.4.1 London Plan Policy D6 *Housing quality and standards* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 10.4.2 Core Strategy Policy CP17 requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DC61 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. In addition, development should be designed, orientated and positioned in such a way to minimise overlooking between dwellings. The Council's Residential Design Guide supplementary planning document is also relevant.

Daylight and Sunlight

- 10.4.3 The applicant has submitted a Daylight and Sunlight Survey in respect of the potential impact of the proposed development on the daylight and sunlight received by surrounding residential properties in Hacton Drive and those of adjoining Bellway Homes. The survey is based on the guidance set out in in the Building Research Establishment (BRE) "Site Layout planning for Daylight and Sunlight – a Guide to Good Practice" (2011) (the BRE Guide).

- 10.4.4 In assessing the potential impact of a development on daylight to surrounding residential properties, where changes to daylight result in both a Vertical Sky Component (VSC) of less than 27 and a loss of 20%, a loss of daylight would occur which would be noticeable to occupants.
- 10.4.5 In assessing the potential impact of a development on the sunlight to surrounding residential properties, if a room receives more than a quarter (25%) of annual probable sunlight hours, including at least 5% in winter, then the room should receive enough sunlight. If the sunlight hours are both less than 25% annually or less than 5% in winter and a loss of more than 20% has occurred or the value is reduced by 4 (%) then the occupants of the building will notice a loss of sunlight.
- 10.4.6 The survey report shows that the overshadowing from the proposed scheme is not at significant risk of infringing upon the neighbouring properties. The daylight study shows no shading to neighbours. The analysis as presented in the XCO2 report shows that of 21 March there is no shadowing from the scheme that affects residential properties before 17.00pm and at no time do shadows reach neighbouring properties' windows and gardens, when assessed against the BRE standards, as a result of the development proposal.
- Noise
- 10.4.7 Policy DC55 deals specifically with noise and vibration pollution and states that proposals will be refused if the development is likely to generate unacceptable noise or vibration for other land users.
- 10.4.8 London Plan Policy D14 'Noise' requires development proposals to manage noise by avoiding significant adverse noise impacts on health and quality of life, 2) reflecting the Agent of Change principle as set out in Policy D13; 3) mitigating and minimising the existing and potential adverse impacts of noise; controlling and mitigating noise through applying good acoustic design principles; and promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.
- 10.4.9 Emerging Local Plan Policy 34 Managing pollution provides that the Council will support development proposals that:
- "i. Do not unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination; and*
- iii. Optimise the design, layout and orientation of buildings and the use of green infrastructure to minimise exposure to the above pollutants."*
- 10.4.10 The submitted Noise Impact Assessment (NIA) confirms that environmental noise surveys were undertaken in order to establish the currently prevailing noise levels and so assess the suitability of the site for the proposed use with regards to noise, including noise impact on the proposed healthcare development and from it on surrounding residential uses. Assessments were undertaken of comparable mobile MRI/CT scanning units located at Kings Hospital London to assess possible impact upon the nearest receptors. On the basis of the measured site noise levels, taken during Covid affected times with significant reductions in traffic and related road traffic

noise, hours of operation have been suggested to avoid adverse impact on residential neighbours.

- 10.4.11 An assessment has been carried out to determine maximum plant noise emissions at the nearest noise sensitive window and specific criteria have been specified for any plant to achieve. On this basis the assessment indicates that the proposed plant, in conjunction with the proposed attenuation, will be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive residential window.
- 10.4.12 No details of actual plant or equipment to be installed has been provided, it is therefore recommended that a condition be placed on the application requiring any plant to be 10dB below the background noise level at the nearest sensitive receptors. In addition, noise from deliveries and from use of the MRI / CT scan at unsociable times would have the potential to cause a loss of amenity at the closest residential properties to the site. As such, conditions restricting delivery times and operational hours are recommended.
- 10.4.13 Environmental Health were consulted on the proposal and did not object subject to imposition of pre-commencement conditions to ensure that the development is carried out and completed in accordance with details to be approved by the Local Planning Authority relating to noise attenuation/mitigation measures and the proposed mechanical ventilation systems.
- 10.4.14 With regards to odour from the cafe extract system, although sufficient odour dissipation is likely due to the distance to the nearest residential properties, a planning condition requiring details of odour abatement measures for the extract system to be approved by the Local Planning Authority is recommended.
- 10.4.15 In terms of external lighting, a condition is recommended to protect neighbouring residents from the potential impact of the proposal.

*Impact of Development on Neighbouring Occupiers*

- 10.4.16 The distance between the adjacent housing on Hacton Drive and the proposed new Bellway Homes housing and the proposed building is a minimum 23m and 21.6m from the site boundary respectively.. It is at least 45m from any dwelling in Hacton Drive, minimum 55 metres to houses in Suttons Lane, 70 and 34 metres to the new Bellway homes to the east and south respectively. Further, the building is sited at an oblique angle to all homes to the north, east and south east, so the possibility overlooking could actually occur, is reduced further and in reality is extinguished altogether. This separation distance and orientation, together with the proposed landscaping, is sufficient to ensure that there will be an acceptable degree of privacy for existing and future occupants at adjacent properties.
- 10.4.17 The elevations and roof are staggered in order to break the building's elevation and soften the visual connection with Suttons Lane. The form of the building is more linear than vertical - especially with the change of materials to the upper floor and plant screen levels, so as not appear to be a tall building. Terraces are proposed on both north and south wings, as well as a biodiverse green roof on the north wing, adjacent to the roof plant. While the terraces are well set away based on the distances above,

a screen of minimum height 1.8m to the northern boundary of the roof terrace is recommended. A condition requiring further details is recommended.

- 10.4.18 For the reasons above, the proposal would have no significant impact on neighbour amenity in terms of access to day/sun/sky light, privacy or overbearing impact
- 10.4.19 Giving consideration to the scale of the proposal, its siting and the separation distance from neighbouring properties, it is considered that the development would not have an unreasonable impact on the residential amenity of neighbouring properties or the future occupiers of the care home subject to appropriate conditions. In this respect, no objections are raised with regard to London Plan policy D6, D14, Local Plan policies DC55, DC61 and the NPPF.

## 10.5 **Heritage Issues**

- 10.5.1 The former 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.
- 10.5.2 The Historical Background report identified and analysed the various buildings on the site in detail. To explore the blanket local listing of the site, some of the buildings were assessed as falling below the standard for local listing and others were of a suitable standard for local listing. Block 4A, the Administration Block, was identified as being locally listable while Blocks 1A and 1B were identified as being of lesser interest. Blocks 1A and 1B are the buildings proposed to be demolished for the new health facility.
- 10.5.3 The remainder of the former St. Georges Hospital site, situated immediately to the east and south of the site comprises the Phase 1 and 2 sites for the development of 356 dwellings of varying heights, currently under construction. The area to the immediate north of the site comprises residential neighbourhoods. To the west (opposite) of the site are residential bungalows fronting Suttons Lane.
- 10.5.4 As part of the Masterplan applications for the redevelopment of the site for residential and healthcare development, the Heritage Assessment set out the assessment of significance for all buildings at St George's, supported by the Historical Background report. The findings were accepted by the LPA, through the grant of planning permission for the new healthcare development, which included the demolition of the existing buildings on this part of the hospital site – application ref.P0323.15.
- 10.5.5 It should be noted that the Phase 2 development (P1917.18) would result in the demolition of further buildings on the site, including the Ward block that sits between the site and Block 4A, the Administration Building, which is being retained and converted. The case has been made to allow the loss of all but the former Administrative Building to be converted to residential flats.
- 10.5.6 A new building will be introduced to the north of the retained Administrative Building (Block 4A) with a separation distance of some 140metres with new housing

development in between. The separation distance, intervening development and new landscaping to the southern boundary will limit the impact of the proposed development of the setting of former Administrative Block, the only retained locally listed building remaining on former hospital site.

10.5.7 Although the height to parapet will be around 13m in height, only slightly taller than Administrative Building which is 11.71m in height. However, the intervening new build development for Phase 2's blocks C1 and C2 are measured at 10.4 and 14.83 metres to ridge respectively. As such, it is considered that the proposed building will not form a distraction from Administrative Building. The new building will have a similar set-back from Suttons Lane as the existing Block 1A and the smaller west elevation of the building will face the road. Administrative Building will remain the more prominent building along the Suttons Lane frontage.

10.5.8 In conclusion, the Site contains no designated assets i.e., listed buildings, scheduled monuments or conservation areas. The site is identified as being of local heritage interest with no further detail. The proposed development would provide a high quality development on the site which would appropriately address the public realm. The public benefits of the development would outweigh the harm caused by the demolition of some lower order non-designated heritage assets on the application site. Also, it is considered that there would be no loss of significance of Administrative Block as a result of the proposed development. It is therefore considered that there is no in principle policy objection to the application proposals from a heritage perspective; the development proposal would be appropriate and would accord with the stated policies.

## 10.6 **Access, the impact on the highway network and parking provision.**

10.6.1 London Plan policy T4 states that 'when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance'. Policies T2 and T5 relate to healthy streets, the provision of cycle and pedestrian friendly environments, whilst policy T6 relates to parking standards. Core Strategy policy CP9 seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', whilst policy CP10 reinforces the aims of London Plan Policy T4, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan. Policy T7 Deliveries, servicing and construction requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street. These aims are also reflected in Policies 23 and 24 of the emerging Local Plan. These objectives are broadly consistent with a core principle of the NPPF that planning should seek to secure high quality design.

- 10.6.2 The application is accompanied by a Transport Impact Assessment (TA) which updates that submitted for the permitted outline application. The application site benefits from a very poor to moderate level of Public Transport Accessibility Level (PTAL) (0-3). Concerns have been raised on highways grounds in representations received from residents and consultation response from TfL. Some representations argue that the level of parking is inadequate and will lead to overspill parking on adjoining by users of the new healthcare facility, while TfL argues that the level of parking is excessive and not in line with the London Plan's aim of reducing the use of private vehicle to making journeys, and as such contrary to the Mayor's Healthy Streets approach..
- 10.6.3 The TA identifies that the predicted traffic generation for the increase in size of the medical facility over that of the consented scheme is such that when distributed over the wider highway network, has a very limited impact on local junctions, which are more likely to be adversely affected as a result of any natural growth in traffic in any event, and the proportion of additional traffic arising from the proposed health centre is small.

#### Access

- 10.6.4 Two new vehicular access are proposed from Suttons Lane. The access located the south west will be approximately 5.8m wide and would serve as the main vehicular access for the new facility leading to the drop-off points close to the main entrance, ambulance drop-off and waiting areas and the larger staff and public carpark. A pedestrian walkway (3m wide) leading to the main entrance is proposed 12m to the north of this access and the second vehicular access is located towards the north west corner of the site next to the existing access to the existing substation. This access will be approximately 7.2m in width and will serve the MRI/CT scanners, maintenance and service delivery area.
- 10.6.5 The width of the new accesses route is suitable to enable two way vehicle flow in respect to the main carpark area and to allow for unobstructed ingress and egress for the MRI/CT mobile scanners and visibility along Suttons Lanes. The access would be of the form of a vehicle crossing, thereby retaining pedestrian priority across the frontage of the site and ensuring that a new minor access is not created which would introduce difficulties in terms of junction spacing.
- 10.6.6 It is intended that the Service Area would have controlled access gate. The setback of the building is sufficient that any ingress and egress of vehicles shall not interfere with the highway, nor shall vehicles waiting for delivery/service and emergency vehicles to manoeuvre within the site obstruct the carriageway whilst undertaking this activity.

#### Parking

- 10.6.7 At the time of submission of the outline healthcare application, 55 spaces was the indicative future carpark spaces to be provided. In the course of determining the application, members of the Strategic Planning Committee requested an increase in the number of parking spaces. As a result, the parking spaces was increased to up to 110 (an increase of 55 spaces), which is the consented level of parking for the outline permission. This increase was still in line with the traffic generation characteristics of the comparative trip rate examples used at that time.

- 10.6.8 The current application proposes 110 surface car parking spaces (peak staff parking demand of 48 spaces and total peak patient demand of 60 Spaces) alongside three ambulance waiting spaces and a vehicular drop off area. According to the TA, the consented scheme was 3,000m<sup>2</sup> in size and the proposal is 4,629m<sup>2</sup>. The difference in size being 1,629m<sup>2</sup>. Since the time of the original TA being submitted for the consent scheme in June 2020 there have been no changes in the highway network tested as part of that consent of any significance.
- 10.6.9 In its response, TfL has advised that the level of parking is considered too high and that the layout arrangement where the 110 surface car parking spaces alongside three ambulance waiting spaces and a vehicular drop off will create a car-dominated landscape contrary to the Mayor's Healthy Streets approach; that this level of parking does not support achieving the Mayor's target for 75% of trips in outer London to be by sustainable modes. Whilst recognising that the outline permission includes 110 parking spaces, TfL has suggested that a reduction in the level of parking proposed would be strongly supported in line with London Plan policies T1 (Strategic approach to transport), T2 (Healthy Streets), GG2 (Making best use of land) and D8 (Public realm).
- 10.6.10 Wheelchair parking spaces are provided, equating to 12% (13 in total) which exceeds the policy requirement for both designated and proposed future enlarged bays. 20% of car parking spaces (22 in total) will be active electric vehicle spaces, in accordance with policies T6 and T6.5 of the London Plan and Policy 24 of the emerging Local Plan.
- 10.6.11 Whilst it is recognised that Policy T4 of the London Plan aims to contribute to modal shift through the application of lower parking standards, a balance has to be reached in the particular circumstances of this proposal. The Highways Authority have advised that due to Havering being an outer borough and with high car ownership, the level of parking proposed is necessary to as not to create any parking stress in the locality. It is also relevant that the facility provides medical facilities for those likely to be unwell, elderly and/or frail and the opportunity for walking/cycling to any appointments may be limited. Further, it should be stressed that the outline permission with 110 parking spaces is still extant.
- 10.6.12 In terms of parking, Policy T6 of the London Plan relates to parking standards while Policy 24 of the emerging Local Plan requires all developments to provide sufficient parking provision in accordance with the maximum parking standards in the London Plan. Paragraph 107 of the NPPF states that if setting local parking standards authorities should take into account the accessibility of the development, the type, mix and use of the development, availability of public transport; local car ownership levels and the overall need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. There are no specific car parking standards for healthcare developments provided in the London Plan 2021. The application is supported by a Travel Plan which would seek to promote non-car use by staff and publicise public transport, cycle and pedestrian access to the facility.



### Traffic and Ambulance

- 10.6.13 As a stand-alone application (as opposed to the masterplan proposals) this proposed development would create additional hospital floor space and likely additional traffic. However given the level, it is accepted that this would be unlikely to cause traffic problems.
- 10.6.14 Notwithstanding the above, Highways have advised that given the level of trip generation and attractions, Suttons Lane and Airfield Way have speed related issues, and given the close proximity of Saunders Drapers School, Suttons Primary School and Fledgelings Day Nursery in Hacton Drive, it is suggested that the following road safety measures, to be secured by S106 contribution, are installed to mitigate the effect of the proposal:
- i. A traffic island with internal illuminated bollards in Suttons Lane by the existing entrance to site;
  - ii. A speed table at the existing toucan crossing at the existing toucan crossing in Suttons Lane by Squadrons Approach;
  - iii. A traffic island with internal illuminated bollards are installed in Airfield Way, south of Squadrons Approach.

### Cycling Parking

- 10.6.15 The site does not currently benefit from any provision for cycle parking, however a total of 70 secure and weatherproof (two tier) cycle parking spaces are proposed for staff and visitors. These are to be location in the entrance and parking area to the east of the site. The cycle shelter general arrangement drawing shows that 2 cycle parking stores are proposed, one by building entrance and another at the back of the site past the car park. In line with Policy T5 of the London Plan, the level of long stay cycle parking proposed is supported. However, TfL has advised that the level of cycle parking falls short of the level required for a Class D1 (now Class E(e), and that, a Health Centre should provide 1 long stay cycle parking space per 5 fulltime employee (FTE) staff and 1 short stay cycle parking space per 3 FTE staff. Bases on the DAS the proposal may produce up to 318 FTE staff, which would mean that the level of short stay cycle parking proposed needs 106 spaces from its current 11, in order to comply with London Plan T5 (Cycling).
- 10.6.16 Similarly, the location of the long stay cycle parking store is said not to be London Cycling Design Standards (LCDA) compliant. As set out in section 8.4.1 (Serving destinations) of the LCDS, long stay cycle parking should be within 50m and in a convenient location for entrances to and exits from a destination. In addition, long stay cycle parking should be secure with access for staff only.
- 10.6.17 TfL has therefore requested that the quantum of cycle parking is increased and the proposed location of long stay cycle parking is amended to ensure it is closer to the building entrance. This must be undertaken to ensure the development removes barriers to cycling and creates a healthy environment in which people choose to cycle in line with London Plan policy T5. As such, the cycle provision is below the London Plan standards. However, officers are of the view that the additional 95 spaces can be accommodated within the site with careful rearrangement/realignment of the landscape master plan without injury to this Green Belt. As such, it is considered that a refusal cannot be justified on this

ground. A condition requiring details of the cycle storage to be submitted as part of the overall approved landscape plan is recommended.

Waste Management Strategy

- 10.6.18 The provision of clinical and residual waste and recyclables and operational waste management strategy have been assessed and the Council's Waste Management Team is satisfied with the provision and details. An operational waste management plan indicated that waste is proposed to be collected daily by a private contractor. A dedicated waste storage area is proposed within the service area north west of the frontage from Suttons Lane.
- 10.6.19 On balance, given that accessibility by non-car modes of transport is relatively good and a wide range of regularly required services and facilities are within a short walking distance, and whilst some staff and visitors are likely to be car owners, the consequence of this would not result in a significant adverse impact on either the highway network or the living conditions of neighbouring occupiers.
- 10.6.20 Subject to the mitigation measures to be secured through conditions and S106 contribution, as referred to above, the proposal is considered to be acceptable and no objections are raised with regard to relevant national, London and local policies.

10.7 **Accessibility**

- 10.7.1 The application is supported by an access statement which indicates that the building has been designed to be inclusive. A variety of measures and features are proposed which are expected within such a civic health building. These include level access throughout each floor, step free and lift access, creating access for all.

10.8. **Flood Risk and Development**

- 10.8.1 Local Plan Policy DC48 states that development must be located, designed and laid out to ensure that the risk of death or injury to the public and damage from flooding is minimised, whilst not increasing the risk of flooding elsewhere and ensuring that residual risks are safely managed.
- 10.8.2 The Council's Strategic Flood Risk Assessment maps show that the site is not located in a higher risk flood zone London Plan policies SI12 and SI13 state that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy DC48.
- 10.8.3 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. The ambition to maximise attenuation of storm water within the landscape is positive. This can enhance the quality of the landscape as well as helping to address potential flood issues. Clarification of how much attenuation through landscape features can be achieved and if/where any additional measures such as tanks may be required is included as part of the planning submission/conditions.

10.8.4 A Flood Risk Assessment and surface Water Drainage was submitted with this application. Having consulted the Lead Local Flood Authority – the Council flood risk and drainage management team, no objections have been raised with regard to the impact on surface water flooding either on site or further afield and the proposed development has been found to be acceptable in principle, subject to suggested planning conditions including appropriate mitigation (including adequate warning procedures) can be maintained for the lifetime of the development, in accordance with Local Plan Policy DC48, policies SI12 and SI13 of the London Plan and the NPPF.

## 10.9 **Sustainability**

10.9.1 Paragraphs 155 - 158 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 9 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions ,where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions beyond Part L Building Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. . Specifically, Policy SI2 sets out an energy hierarchy for assessing applications, as set out below:

- 1) *Be lean: use less energy*
- 2) *Be clean: supply energy efficiently*
- 3) *Be green: use renewable energy*

10.9.2 Core Policy DC48 requires development proposals to incorporate sustainable building design and layout.

10.9.3 The applicant has submitted a Sustainability and Energy Report. The energy report sets out that a 35.9% reductions in regulated CO2 emission is predicted to be achieved onsite.

10.9.4 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO2 target reduction:

“Be Lean” – sustainable design and construction measures will be used to improve air tightness, high performance glazing and efficient lighting;

“Be Clean” – highly efficient, individual low NOx boilers (The application site is located in an area where district heating is not currently feasible nor expected to be implemented in the near future. A communal system with heat pumps is proposed); and

Be Green” – the installation photovoltaic panels (PV) at roof level and the use of air source heat pumps.

10.9.5 The applicant’s submission indicates that BREAAAM excellent is likely to be achieved and this would be secured by condition. The incorporation of these two technologies into this development would contribute a reduction of 20.8% resulting in a total offset

of 35.9% of regulated CO2 emissions over the baseline emissions using SAP10 emissions factors.

10.9.6 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO2 reduction, it is anticipated that through the above measures the proposal will achieve an overall CO2 reduction of 35.9%. In terms of carbon offset, it is estimate that 147.9 tonnes of non-domestic CO2 emissions would need to be offset through of site contributions. This is estimated at £226,242. The final offset contribution would be determined after a completed SAP certificate has been provided. The mechanism to secure this would be through the section 106 agreement.

10.9.7 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the

#### 10.10 **Air Quality**

10.10.1 The proposed development is located within a designated Air Quality Management Area (AQMA) due to high concentrations of nitrogen dioxide and particulate matter. Paragraphs 112 & 186 of the National Planning Policy Framework and The London Plan policies SI1, SI3, T61 seeks to ensure that development proposals minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within air quality management areas (which the site is) and where the development is likely to be used by large numbers of people vulnerable to poor air quality (such as children or older people). Development proposals should be at least air quality neutral and should not lead to further deterioration of existing poor air quality.

10.10.2 An Air Quality Assessment has been submitted in support of this planning application to assess the air quality impacts of the proposals. The assessment concluded that following the successful implementation of the suggested mitigation measures during the construction phase, the residual effects of construction dust and emissions from construction activities upon the local area and sensitive receptors although adverse, will be temporary and not significant. And that during the operational phase, the operational assessment has demonstrated that the proposals will have a net positive impact upon existing air quality concentrations compared to the current use. Air quality for future residents is predicted to be good.

10.10.3 However, the Environmental Health Officers has advised that the Air Quality Assessment for the construction phase has shown that the site is Medium to High risk, in relation to dust soiling and Low risk in relation to human health effects. Based on this risk assessment, appropriate mitigation measures need to be set out in a Dust Management Plan, to ensure the air quality impacts of construction and demolition are minimised. Likewise, GLA has confirmed that the additional info submitted in response to the queries raised in the Stage 1 have now all been satisfactorily resolved subject to condition. This is to be secured by conditions.

### *Noise*

- 10.10.4 Local Plan Policy DC55 states that planning permission will not be granted if it will result in exposure to noise or vibrations above acceptable levels affecting a noise sensitive development such as all forms of residential accommodation, schools and hospitals.
- 10.10.5 A Noise Impact Assessment has been submitted with the application. The acoustic report demonstrates the site is located within noise sensitive area. As a result, the report suggests a series of mitigation measures, all of which are to be incorporated into the scheme to meet the aims of Policy DC55. Again, the Environmental Health officer has not raised any fundamental objection to the proposal on noise grounds subject to conditions.
- 10.10.6 Based on the above and with the suggested mitigation measures in place, it is considered that the proposed development would accord with national, regional and local planning policies in relation to noise and air quality

### 10.11 **Archaeology and Contamination**

- 10.11.1 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. The Greater London Archaeological Advisory Service has requested the imposition of a condition to require a two stage process of archaeological investigation to ensure that any potential remains dating to post medieval development are understood and evaluated to clarify the nature and extent of surviving remains. Officers consider that subject to such condition the proposal accords with the guiding principles of the NPPF, Policies HC1 of the London Plan, DC70 of the LDF, 28 of the emerging Local Plan and the Heritage SPD with regards to archaeology and cultural heritage matters.

### *Contaminated Land*

- 10.11.2 The Council's Environmental Health officer has recommended a Phase II and Phase III Remediation Strategy report to be prepared following review of the Phase 1 Desk Study submitted as part of the above planning application, and taking into account its findings and conclusions, subject to the approval of the Local Planning Authority to ensure that there is no risk of contamination in accordance with Local Plan policies CP15 and DC53 the NPPF

### 10.12 **Ecology / Greening and Biodiversity**

- 10.12.1 Policies CP16, DC58 and DC60 of the Havering Core Strategy seek to safeguard ecological interests and wherever possible, provide for their enhancement. The emerging Local Plan, Policy 30 states that the Council will protect and enhance the Borough's natural environment and seek to increase the quantity and quality of biodiversity by ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. The policy goes on to state that it will not permit development which would adversely affect the integrity of Specific Scientific Interest, Local Natural Reserves and Site of Importance for Nature Conservation, except for reason of overriding public interest, or where adequate compensatory

measures are provided. The Council has also adopted the 'Protecting and Enhancing the Borough's Biodiversity' SPD (2009). This requires ecological surveys of sites to be carried out prior to development.

10.12.2 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. A Phase 1 Walkover ecological survey was undertaken in September 2020, which built on Phase 1 and detailed ecological surveys carried out in 2014 and 2015 by the same ecological surveyors. This identified that there are no European or internationally protected sites within 10 km, the nearest being Epping Forest approximately 15 km northwest, but one nationally important site, the Ingrebourne Marshes SSSI, within the 2 km search radius as well as one Local Nature Reserve (Ingrebourne Valley) being 254 metres to the east at its closest.

10.12.3 The ecological Appraisal confirms that *"The part of the site including the healthcare centre extending into other parts of the former hospital has been classified as: Open Mosaic Habitats on Previously Developed Land"*. With respect to protected species the report confirms that *"The update survey did not record any features of particular suitability for protected species and species of principal importance considered in the context of previous survey records and our recommendations on site management having been followed during the intervening years."*

10.12.4 Positive and preventative measures are proposed to address areas of concern in relation to bats, reptiles and birds such as the:

- Use of native species of trees, shrubs and grassland planting as part of the landscape proposals;
- Retention of hardwood logs from any on-site tree felling to be used to create a stag beetle log pile
- Provision of hedgehog habitats including brash piles and increasing permeability across and beyond the site
- Provision of bat roost boxes on buildings
- Provision of bird nest boxes including sparrow terraces and house martin boxes

10.12.5 The report concludes that, if these recommendations are followed there are no reason with respect to ecology why the site should not be successfully developed. These matters can all be safeguarded by the use of appropriate conditions. Natural England has not raised any fundamental objection to the proposal. In this respect it is considered that scheme proposals accord with the adopted and emerging development plan.

10.12.6 The Landscaping Officer has recommended a number of conditions that should be imposed to ensure that the development undertakes the relevant surveys and incorporates appropriate ecological enhancement on site. Subject to these conditions, it is considered that the development would be acceptable in this regard.

#### Trees

10.12.7 The London Plan Policy G7 Trees and woodlands part C requires development proposals to ensure that, wherever possible, that existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should

be adequate replacement based on the existing value of the benefits of the trees removed.

10.12.8 A Tree Survey has been prepared and highlights the existence of a number of mature trees on the site albeit just 4 are category A (1) and B (3) trees, with the remainder being category C and U trees. The proposed layout ensures that the 4 category 'A' and B trees are retained, as are most trees on the northern boundary of the site, to the rear gardens of Hacton Drive dwellings.

10.12.9 The proposal will result in the loss a number of category C and U trees (deemed to have limited amenity or biodiversity value, or are otherwise determined to be of limited value, reaching the end of their natural lives or having structural and biological defects) to facilitate the development scheme. However, replacement and new trees of approximately 80-90 trees are to be planted, the majority of which are to be native or pollinator species which will provide biodiversity benefits.

10.12.10 Overall the level of replacement tree planting has been adequately addressed within the current proposal or part of the applicants' future masterplan, particularly in light of the growing body of evidence of the public health benefits of trees (for example by mitigating air pollution, reducing stress, and improving mental health and patient recovery times) in accordance with state policy. A landscape condition for implementation and management of the retained and replacement trees is recommended.

10.12.11 In terms of greening, the development proposals presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. A green roof is proposed to the north and west corner of the roof of the building. The scheme includes a good variety of planting typologies at ground level, including substantial areas of semi natural vegetation. The applicant has calculated the Urban Green Factor (UGF) of the proposed development as 0.35, which exceeds the target set by Policy G5 of the London Plan.

### 10.13 **Statement of Community Involvement**

10.13.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the cause of major applications such as this to undertake public consultation exercise prior to submission of a formal application.

10.13.2 Prior to the submission of this application, the applicant did hold Public Information Event. The applicant had sent out leaflets of invitation to local residents that residing close to the site. The applicant also advertised the public event in the local newspaper.

10.13.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.

10.13.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

## 11 Financial and Other Mitigation

- 11.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with Policy DC72 of the Havering Local Development Framework Core Strategy and Development Control Policies Development Plan Document (2008) nor meet the objectives of policies SI2 and DF1 the of London Plan.
- 11.2 Due to the nature of use, the Havering Council's Community Infrastructure Levy is not applicable.

## 12 Other Planning Issues

### *Designing Out Crime*

- 12.1 Policy CP17 on 'Design' and Policy DC63 on 'Delivering Safer Places' from LBH's '*Development Plan Document*' 2008 falls in line with national and regional planning guidance which places design at the centre of the planning process. The above mentioned policy piece together reasoned criteria's for applicants to adopt the principles and practices of Secure By Design (SBD). More detail on the implementation of the above policy is provided from LBH's SPD on '*Designing Safer Places*' 2010, this document which forms part of Havering's Local Development Framework was produced to ensure the adequate safety of users and occupiers by setting out clear advice and guidance on how these objectives may be achieved and is therefore material to decisions on planning applications.
- 12.2 The submitted Design and Access Statement has referenced a management and security strategy, benefits of this approach provide a sense of security to its residents and the local community and discourage antisocial behaviour. The statement outlines that the design has been developed with SBD principles in mind following subsequent consultation response by the Designing out Crime Officer. Points raised include improved residential areas (secure access and access control), residential amenity spaces, refuse collection and bicycle storage areas. The Designing Out Crime Officer has raised no fundamental objection to the proposal subject to conditions.

## 13 Conclusions

- 13.1 The site is previously developed land within the Green Belt with an extant planning permission for redevelopment to provide up to 3,000sq.m health centre. As a result, the principle of redevelopment of this part of the former St George's Hospital site to provide a health care facility is established. There are now residential development on all sides of the site. The site is identified in the emerging Local Plan for redevelopment to provide social infrastructure.
- 13.2 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide a new Health & Wellbeing Hub so that more services are provided within the community, the dependency on acute services will be reduced, help reducing the rate of A&E attendances and achieve quicker discharges for patients admitted. Whilst the new St George's Health and Wellbeing Hub would have a greater impact on openness, its scale and component will allow the health system to deliver health and primary care at



scale to meet the demands of the forecast increase and changing demographics of the population of Havering. This benefit, on balance, outweighs the harm to the Green Belt.

- 13.3 The proposed redevelopment of the site would provide a high quality medical facility development which would be a positive contribution to this area of Hornchurch and the wider borough. The site is currently occupied by buildings of a former hospital (C2 Use Class) facility which is characterised by traditional pitched roof brick buildings. The development will result in investment in healthcare services in the Borough to be run out of modern facilities. The redevelopment of this Green Belt site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and would not have bearing on the purpose of including land within it than the existing development.
- 13.4 The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.
- 13.5 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. Other material considerations have also been considered
- 13.6 Subject to the imposition of relevant conditions and the satisfactory completion of a Section 106 Agreement, to secure the listed obligations, the proposal is considered acceptable in terms of the above and is not contrary to the aims and objectives of National Planning Policy Framework 2021, the policies and proposals in the London Plan (2021), the Havering Core Strategy and Development Control Policies Development Plan Document 2008, the emerging Local Plan, having regards to all relevant material considerations, and any comments received in response to publicity and consultation. It is therefore recommended that planning permission be granted.