

Our reference: MGLA211024-3324

12 November 2024

Thank you for your request for information which the Greater London Authority (GLA) received on 18 October 2024. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

I would like to request information relating to Wandsworth planning application 2022/5288, which was called in by the Mayor and with respect to which a decision was recently made, which was confirmed by the Deputy Mayor at the meeting on 8 October 2024. Specifically I would like to request information that formed the basis upon which the following conclusions were made:

- that the entirety of the land that is the subject of this planning application is categorised as "brownfield"; and
- the reversal of the assessment that had been made at Stage 1 that the height of the development would be "excessive" and harmful, despite the height of the development remaining the same.

As part of this, I would like to request a copy of the legal advice in relation to the first bullet point, which was specifically referred to by the Deputy Mayor when he informed the meeting of the decision that had been made.

Our response to your request is as follows:

- *That the entirety of the land that is the subject of this planning application is categorised as brownfield*
- *As part of this, I would like to request a copy of the legal advice in relation to the first bullet point, which was specifically referred to by the Deputy Mayor when he informed the meeting of the decision that had been made.*

The rationale for concluding that the site comprises previously developed land within the meaning of the NPPF is set out in the Stage 3 Report.

No Legal advice was provided in relation to whether or not the application site is "brownfield".

GREATER LONDON AUTHORITY

In the closing statement Jules Pipe said

“...Furthermore **our legal advice** has made it clear to me that the issue of whether it is previously developed land **is a planning judgement** and I am clear having visited the site the proposal would involve the reuse of previously developed land and contribute to meeting an identified housing need” (2hr 25m and 20sec of the hearing video).

<https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/public-hearings/springfield-hospital-public-hearing>

The aforementioned ‘Legal advice’ that this is a ‘planning judgement’ (and not a legal one) was provided verbally during the adjournment.

- *the reversal of the assessment that had been made at Stage 1 that the height of the development would be "excessive" and harmful, despite the height of the development remaining the same*

The height of the development is discussed in the Stage 3 Report. Specifically, paragraph 129 says:

“In the GLA Stage 1 report, GLA officers concluded that a reduction of one storey to Block C would be required to reduce the visual impact of the development. During the assessment of this application, the applicant provided an updated TVBHIA and VuCity model which demonstrates that the current proposed height of Block C will have an acceptable visual impact and is therefore supported.”

A copy of the updated TVBHIA has been provided.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA211024-3324.

Yours sincerely

Information Governance Officer

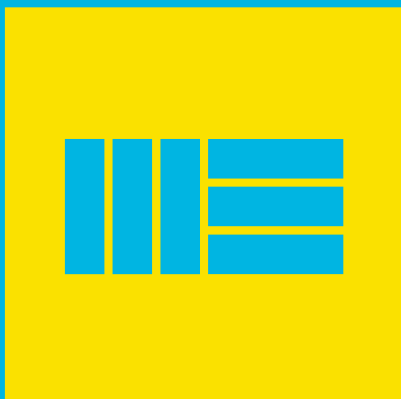
If you are unhappy with the way the GLA has handled your request, you may complain using the GLA’s FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

HERITAGE, TOWNSCAPE AND VISUAL IMPACT ADDENDUM: RESPONSE TO GLA CLARIFICATIONS

SPRINGFIELD VILLAGE PH2B

16 AUGUST 2024



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1.0 INTRODUCTION

1.1 BDW Trading Limited and STEP Springfield Village Limited (hereafter referred to as the 'Applicant') has instructed Montagu Evans to produce this Heritage, Townscape and Visual Impact Assessment Addendum (the 'HTVIA Addendum'). This is in support of proposals (the 'Proposed Development') which are subject to a planning application at Springfield Hospital, Glenburnie Road, London, SW17 7DJ (the 'Site'). The Applicant submitted this planning application to the London Borough of Wandsworth on 20th December 2022 (LBW Ref: 2022/5288); this Addendum refers to it as the 'Submitted Application'.

1.2 The planning application provided a full HTVIA; this referred to as the 'Submitted HTVIA'. It formed Volume 2 of the submitted Environmental Statement (the 'ES'), collated by Trium Environmental Consulting.

1.3 The description of development for the Submitted Application is as follows:

"Demolition (in severable phases) of all existing buildings and structures including the Diamond Estate, the Shaftesbury and the Morrison Building, and the comprehensive redevelopment (in severable phases) of the site to provide a total of 449 residential units of both private and affordable tenure in four apartment blocks ranging from 3 to 5 storeys high and nine 3 storey town houses; associated private and communal amenity space including balconies and gardens, 48 car parking spaces (including 13 disabled bays) and 817 cycle parking spaces; together with associated works including landscaping and public realm works, including extension to the existing landscaped public park, creation of new access route from Lapidge Drive into the site, and provision of a new link to Streatham Cemetery.

An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) "

1.4 LBW's planning committee recommended refusal on 19th March 2024.

1.5 The GLA have since recovered the application. As part of the decision-making process, the GLA requested clarifications and queries on heritage, townscape and visual amenity, provided in an email issued on 11th July 2024.

1.6 The clarifications are:

1. *The HTVIA is authored by Montagu Evans and sits within an EIA by Trium. The identity and appropriate qualifications, experience and expertise of the authors should be clearly stated within the document itself.*
2. *The HTVIA makes use of a ZTV (at page 9) and this is helpfully overlaid with heritage assets. This should be repeated in the new document together with a clear note explaining how the ZTV was produced (i.e. bare earth, trees on or off, leaves on or off, atmospherics on or off etc and whether it represents the ZTV in the existing or cumulative scenario). As discussed, given the rapidly evolving nature of the wider site, it would be helpful to have two ZTVs, one based on the "existing" scenario (as the site exists at this time, if possible) and one based on the cumulative scenario (as the site will exist once consented schemes are completed nearby, if possible).*
3. *The existing photography is out of date in this case since it was taken around March 2022 and the site has evolved quickly. Our strong preference is for all existing views to be updated. Judging from the recent site visit, the most out of date appear to be Views 1, 6, 9, 10 and 11 and these should be updated.*
4. *Winter views should be provided. We note that the only summer views are Views 11, 12 and 13, which were taken in May and August 2022. If there is a winter view on file, we suggest that it is used. If not, and given that the application may be determined before the onset of winter, we suggest that a VuCity model shot, as closely resembling the AVR as possible, be used.*

5. *We would like to check the scoping of some heritage assets. The ZTV at page 35 of the current HTVIA suggests that there will be mutual intervisibility between the proposed development and the Church of St Mary, Summers Town and the Lodge, Almshouses and Chapel of St Clements Danes (all to the southwest of the site). I suggest that you provide VuCity model shots from locations within the ZTV area adjacent to these assets and I can then advise whether full AVRs will be needed from these locations.*
6. *Please note the comments of my colleague Charleen Henry, who requested an additional view from the cemetery and a Hi Res version of the existing HTVIA.*
7. *The HIA should briefly address the heritage interest (if any) of the Diamond Estate (1970s nurses housing), the Shaftesbury Building (1980s or 1990s forensic wing) and the Morrison Building (late 1920s hospital building), with brief details of their dates of construction and architects. Our initial sense is that only the Morrison Building is of any interest, and we may require a recording condition on this building in due course.*
8. *At Stage 3 the GLA will be assessing impacts on the settings of Non-Designated Heritage Assets (if any). The existing HTVIA covers this, but I would be grateful if you could check that all the relevant NDHAs are included (to avoid any late requests for information).*

1.7 **Section 3.0** of this Addendum addresses these points.

1.8 Outside of the ES, the GLA have requested the production of a Heritage Impact Assessment (HIA; Appendix 4). It provides the findings of the ES document and applies the NPPF terminology to assessing heritage. For the avoidance of doubt, the HIA does not provide different information to the application. It should be read alongside this report and the Submitted HTVIA, with a focus on the heritage sections within that report.

1.9 Montagu Evans has undertaken a review of the baseline information produced as part of the Submitted Application, as part of this Addendum. It is appropriate therefore that the Legislation and Planning Policy section of the Submitted HTVIA is updated in this Addendum.

1.10 As part of the preparation of this Addendum, we have undertaken a review of the heritage context and conclude that the baseline considerations as set out in the Submitted HTVIA remain sound and valid. This includes a review of Park Area B and Plots D1 and D2 now being in the baseline; they do not materially alter the baseline condition. We also confirm that the townscape and visual amenity baseline set out in the HTVIA has not altered and similarly remains sound.

Relevant Planning History

1.11 In 2012, planning permission was granted following an appeal (Secretary of State appeal references: (A) APP/H5960/A/11/2156427 and (B) APP/H5960/E/11/2156424) regarding works to the hospital and the wider Springfield Hospital site. Much of the works are implemented and are gradually being finished, with works to the Springfield Hospital main building (Grade II) completed in 2022. The hospital building is now residential use. Works to extensively landscape Springfield Park are underway, with Park Area B being open and used by the public now. The park creates a generous, open space for leisurely uses. Plots D1 and D2 are to be completed by the end of 2024; owing to their position in the masterplan, they do not change anything in the terms of the assessment.

1.12 The Applicant submitted a planning application to the London Borough of Wandsworth on 20th December 2022 (LBW Ref: 2022/5288) for plots referred to as X, Y, Z and VB in the 2012 application. These plots have consent for 89 units under this planning application, which would be provided in a town house typology. The inspector concluded that any harm to heritage assets would be outweighed by the public and heritage benefits which included the refurbishment of the Main Building (Grade II) and the reinstatement of the Grade II Registered Park and Garden that forms its landscape. The Original Planning Application (OPP 2012; or the 'Consented Application') had permission to be built into the designated Metropolitan Open Land (MOL); in the Outline Planning Permission 2012, the inspector was concerned about the impact

Plots P, Q and G had on the MOL and the spatial impact of the wider masterplan on the Springfield Hospital Main Building (Grade II). The focus was not on X, Y, Z and VB, which are the focus of the Submitted Application.

- 1.13 The Submitted Application, concerning plots X, Y, Z and VB, would provide 449 residential units of both private and affordable tenure in four apartment blocks ranging from three to five storeys high and nine three-storey town houses; associated private and communal amenity space including balconies and gardens. This planning application was recommended refusal by LBW's planning committee in March 2024.
- 1.14 On 20 May 2024, pursuant to section 2A of the Town and County Planning Act 1990 (as amended) and in accordance with the Town and Country Planning (Mayor of London) Order 2008 ("the 2008 Order"), the Deputy Mayor for Planning, Regeneration and Skills (acting under delegated authority) directed that the GLA would act as the local planning authority for the purpose of determining the following planning application: LB Wandsworth Reference: 2022/5288.

2.0 LEGISLATION AND PLANNING POLICY

2.1 This section sets out the legislation and planning policy framework that is pertinent to an assessment of the Proposed Development. Taken as a whole, whilst new planning policy and guidance has been adopted subsequent to the preparation of the original HTVIA, there are no material changes to the assessment framework.

Planning (Listed Buildings and Conservation Areas) Act 1990

2.2 There are listed buildings in the wider area, including the Grade II listed Springfield Hospital. The proposals are not considered likely to impact the setting and significance of the Hospital, although due reference is given to the statutory provision under Section 66(1) of the PLBCA Act 1990. For completeness, we restate Section 66(1) here:

In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National Policy

2.3 The National Planning Policy Framework (NPPF) was updated in December 2023. A draft NPPF was issued for consultation in August 2024, which does not represent any material change to the relevant chapters that concern this HTVIA Addendum. The heritage policies in Chapter 16 remain unchanged, and the drafting of townscape and design policies have not been updated sufficiently to represent a material change to the HTVIA. Therefore, the policy framework set out in the HTVIA remains sound. For clarity, paragraph numbers have been updated as expressed below in Table 1:

NPPF Paragraph Number Update	
NPPF 2021	NPPF 2023
130	136
132	137
133	138
134	139
135	140
194	200
195	201
197	203
199	205
200	206
201	207
202	208
203	209
206	212

Table 1: NPPF Paragraph Number update

Development Plan

2.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the Development Plan applicable to the site for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise. Relevant documents of the statutory development plan are identified for this assessment as follows:

- London Plan (2021); and

- Wandsworth Local Plan (2023-2038), this has been adopted since the publication of the Submitted HTVIA.

2.5 Of these, the Wandsworth Local Plan has replaced the Wandsworth Local Plan – Core Strategy (March 2016) and Wandsworth Local Plan – Development Management Policies Document (March 2016). The key new policies in the Wandsworth Local Plan (2023-2038) are:

- Policy LP1 (The Design-Led Approach)
- Policy LP2 (General Development Principles)
- Policy LP3 (Historic Environment)
- Policy LP4 (Tall and Mid-Rise Buildings)
- Policy LP54 Open Space, Sport and Recreation
- OUT3 Springfield Hospital, Burntwood Lane/Glenburnie Road, SW17

2.6 Policy LP1 The Design-Led Approach broadly aligns with 'Policy D3 Optimising site capacity through the design-led approach' in the London Plan (2021). The Proposed Development is compliant with this policy. It achieves this through integrating into the surrounding development within the Springfield Hospital campus, by connecting through to John Hunter Avenue and the creation of a physical gateway to Streatham Cemetery. In turn, this improves permeability between the hospital and open space that surrounds the Site. The Proposed Development continues the established language of materials and forms within the consented masterplan. Its scale is consistent with these surroundings, and corresponds to the relative sensitivities within the Site (i.e. the Metropolitan Open Land and the listed buildings). It further achieves this through landscape design and planting within the scheme, softening its edges and providing an integrated approach to hard and soft landscaping, knitting the development into the adjacent Springfield Park. The Applicant has achieved the above through the use of LBW's pre-application service, public consultation and attendance at the Council's Design Review Panel service.

2.7 Policy LP2 General Development Principles is adhered to, in part, through the above design-led approach. This policy focuses on uses, environmental impacts, intrusiveness, compromising of visual amenity for adjoining sites, health and safety, servicing, recycling and operational needs. The relevant limbs of this policy are B(3) and B(4) which concern design and visual amenity. The Site is set apart from existing buildings in Tooting through its position close to Streatham Cemetery, and connects to John Hunter Avenue to the north.

2.8 Policy LP3 Historic Environment echoes the NPPF policies for heritage. The policy replaced DMS2 Managing the Historic Environment in the Wandsworth Local Plan Development Management Policies Document (2016). Limb A of Policy LP3 states that 'development proposals will be supported where they sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset (both designated and non-designated).'

2.9 The Morrison Building on the Site was considered to be curtilage listed during the 2012 Appeal by virtue of its connection to Springfield Hospital, and was treated as such in the 2012 Appeal for the original masterplan planning consent.

2.10 The 2012 consent included a Listed Building Consent (LBC), which included the demolition of the Morrison Building. We understand that the LBC has been implemented to date.

2.11 The published ES chapter for the Submitted Application did not identify the Morrison Building as being curtilage listed. However, its status was reported to the planning committee during the determination period. There were no reasons for refusal associated with that status. This Addendum provides the baseline assessment of significance for the Morrison Building.

- 2.12 The Site is within the setting of Springfield Hospital (Grade II) and the Elizabeth Newton Wing (Grade II). Section 3 of this Addendum assesses the significance of the Morrison Building in accordance with the NPPF and LP3. With the scheme in mind, as set out in the assessment section, the Proposed Development seeks to preserve and enhance the spaces around the Elizabeth Newton Wing (Grade II) and the Springfield Hospital (Grade II). Paragraph e of policy LP3 states that further detail regarding heritage assets is set out in the LBW Historic Environment SPD.
- 2.13 Policy LP4 Tall and Mid-Rise Buildings replaced Policy DMS4 Tall Buildings in the Wandsworth Local Plan Development Management Policies Document (2016). The key difference between these policies was the introduction of a mid-rise policy. Limb H states that 'Proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan'. Mid-rise are defined as being 12m or more in height (or five-six storeys). The Proposed Development, in line with LP1 and London Plan policy D3, seeks to improve the character and legibility of the area, through the optimisation of previously developed land and provision of affordable homes; this is in line with the supporting text of LP4. The height of the proposed buildings do not give rise to any harmful effects.
- 2.14 Policy LP54 Open Space, Sport and Recreation is relevant through Limb D which highlights that 'public access to open space and sports and recreation facilities on private land will be supported, particularly in areas with an identified deficiency in open space'. The Proposed Development ensures that the Metropolitan Open Land (MOL) in which it is partly sited becomes more usable. It does through provision of an opening between the Site and Streatham Cemetery, a connection which currently does not exist.

3.0 CLARIFICATIONS

3.1 This section sets out the clarifications requested by the GLA with answers here.

3.2 This section is structured with the GLA's query in italics, and Montagu Evans' response below.

1. *The HTVIA is authored by Montagu Evans and sits within an EIA by Trium. The identity and appropriate qualifications, experience and expertise of the authors should be clearly stated within the document itself.*

The HTVIA and this report was reviewed by **Dr Chris Miele PHD MRTPI IHBC**. Dr Miele joined Montagu Evans in 2005 and was formerly a Senior Planning Director at RPS Planning, and Director at Alan Baxter and Associates before that. From 1991 to 1998 Dr Miele was employed by English Heritage to provide advice in support of its statutory function as a listing inspector.

Dr Miele has an MA and PhD in the history of architecture and urban planning from the Graduate School of Arts and Science, New York University. He studied planning at South Bank University and was chartered in 2002. He holds a BA Hons from Columbia College, Columbia University, also in New York. He has lectured widely, including holding positions at NYU, University of Leicester and as an Honorary Professor at the University of Glasgow.

The author of the HTVIA and this report is **Dr Ben Tosland BA (Hons) MA PhD**. Dr Tosland has nine years experience as a heritage consultant. He has published widely on the topic of architecture history, including peer reviewed articles, book reviews, articles in the popular press. His book, *Who Are Godwin and Hopwood? Exploring Tropical Architecture in the Age of the Climate Crisis* was published in 2024 by Birkhauser. He is editing the next Twentieth Century Society journal (*Twentieth Century Architecture*) and is International Corresponding Editor for the *Journal of Architecture* (appointed in June 2024).

He has extensive experience of preparing Environmental Impact Assessments for heritage, townscape and visual impact assessments. Before working at Montagu Evans he worked for the Tavernor Consultancy. He has also worked for the SPAB, Ashford Borough Council and extensively as a freelance heritage consultant. He holds an undergraduate History degree from the University of East Anglia, an MA in Conservation and Regeneration from the University of Sheffield's School of Architecture (IHBC accredited) and a PhD in architecture from the University of Kent.

2. *The HTVIA makes use of a ZTV (at page 9) and this is helpfully overlaid with heritage assets. This should be repeated in the new document together with a clear note explaining how the ZTV was produced (i.e. bare earth, trees on or off, leaves on or off, atmospherics on or off etc and whether it represents the ZTV in the existing or cumulative scenario). As discussed, given the rapidly evolving nature of the wider site, it would be helpful to have two ZTVs, one based on the "existing" scenario (as the site exists at this time, if possible) and one based on the cumulative scenario (as the site will exist once consented schemes are completed nearby, if possible).*

A Zone of Theoretical Visibility (ZTV) has been produced to outline the potential areas where the Proposed Development may be visible (Figure 2.1). The ZTV has been produced using topographically referenced 3D models from VuCity software. It is a tool for a high-level understanding of the extent of visibility, which was interrogated through review of individual viewpoints using field surveys and digital software.



Figure 1.1 ZTV of the Proposed Development prepared by VuCity.

The ZTV was produced with trees switched on and leaves switched off, though it should be noted this does not impact visibility of the scheme in the programme.

The atmospherics of the model were switched off – this does not impact visibility in the programme.

The ZTV shows the scheme in the cumulative scenario.

The grid size is 2000m squared. This is sufficient for a scheme of this size. It is set to a middle grain of resolution.

The ZTV shows the scheme in the cumulative scenario, as assessed in the visual impact assessment. Cumulative consented (or implemented) schemes were switched on.

It is noted that the HTVIA assessed two tiers of cumulative schemes; the ZTV provided here is for Tier 2 which comprises the Proposed Development, plus the Outline Planning Permission 2012 as subsequently amended / subject to Reserved Matters and other Applications, plus schemes in the surrounding area that are subject to an extant consent.



Figure 1.2 ZTV of the Proposed Development prepared by VuCity in the cumulative scenario; note a technical error in VuCity where the Consented Permission (2012) is shown on the Site. This limits where the Proposed Development is visible in the immediate surroundings, though when compared with the proposed scenario, there is little difference; View 10 of the visual impact assessment is representative of the visual experience in this area and should be cross referred to. Of note, is the effect the plots to the north of the hospital and how they limit the visibility of the Proposed Development.

3. The existing photography is out of date in this case since it was taken around March 2022 and the site has evolved quickly. Our strong preference is for all existing views to be updated. Judging from the recent site visit, the most out of date appear to be Views 1, 6, 9, 10 and 11 and these should be updated.

AVR London, the visualisation consultants for the scheme, have reviewed the photography that was submitted as part of the Submitted Application, within the context of the ongoing landscape work at Springfield Hospital. Photography for views 1, 6, 9 and 10 has been updated. While the scene has changed, there is no material difference. The Submitted HTVIA showed cognisance of the ongoing landscaping works within the baseline descriptions of these views. There is no material change to how these views were assessed or the need to update their values. These are provided in full at Appendix 1. Please note that View 10 is provided as a chalk render (AVR 2) and should be cross-referred to the application material (the rendered view submitted as part of the application, as well as the landscape plans).

The views are provided in the following scenarios:

- Existing
- Proposed
- Cumulative (with cumulative schemes shown in a Yellow Wireline)
- Proposed MOL (with elements of the proposals within the MOL shown in a Red Wireline)

View 10 is from a slightly different position to that from the application owing to ongoing construction works at the Site and therefore the photographer was not able to access the position. The position remains representative of the experience of moving around this part of the Site.

View 11 is currently a construction site – the visualisation consultant was not able to access this viewing position. This is reflected in an updated Visualisation Methodology which is provided at Appendix 3.

Please refer to the Submitted Application's material for visual impacts for views 10 and 11 and cross refer to the new location for view 10 for a full understanding.

4. *Winter views should be provided. We note that the only summer views are Views 11, 12 and 13, which were taken in May and August 2022. If there is a winter view on file, we suggest that it is used. If not, and given that the application may be determined before the onset of winter, we suggest that a VuCity model shot, as closely resembling the AVR as possible, be used.*

Winter views were submitted as part of the Submitted Application and were shot in March 2022 prior to agreeing viewpoints with LBW.

LBW requested further viewing positions. These were shot in May 2022 when trees were in full leaf.

This Addendum was completed in August 2024 and therefore uses summer photography for the updated photography provided. From the cemetery and park the updated photography, taken in summer, should be cross referenced with the Winter shots (views 1-10) to get an impression of the density of foliage in locations from the cemetery and within the parkland. We do not therefore consider that Winter shots are required to understand the nature and extent of the impact.

The Applicant has provided a VuCity model for the GLA to test these views with.

5. *We would like to check the scoping of some heritage assets. The ZTV at page 35 of the current HTVIA suggests that there will be mutual intervisibility between the proposed development and the Church of St Mary, Summers Town and the Lodge, Almshouses and Chapel of St Clements Danes (all to the southwest of the site). I suggest that you provide VuCity model shots from locations within the ZTV area adjacent to these assets and I can then advise whether full AVRs will be needed from these locations.*

There are three separate listed buildings highlighted here:

- Church of St Mary (Summers Town) (Grade II)
- St Clement Danes Holborn Estate Almshouses and Chapel (Grade II)
- Lodge to St Clement Danes Almshouses (Grade II)

An assessment of the Lodge to St Clement Danes Almshouses (Grade II) was made in the Submitted Application and remains valid. That information is not repeated here.

We have used VuCity to understand the potential for visual changes to settings, and provided views below. Where relevant, these views are supported by extracts from the ZTV, with the focal building highlighted, and screenshots from Streetview to support the analysis. The VuCity model shots have been provided in full at Appendix 3.

In summary, the ZTV shows flashes of visibility outside of Church of St Mary (Summers Town) (Grade II) and the St Clement Danes Holborn Estate Almshouses and Chapel (Grade II). The ZTV shows this visibility owing

to a sliver of the scheme having theoretical visibility from these locations. We summarise the contribution setting makes to the significance of these assets here, and conclude on the overall effect here for completeness.

As this is an addendum to the HTVIA (Environmental Statement; ES) the assessment is structured in the manner of the ES. The effects are highlighted in NPPF terms in the separate HIA summary document (Appendix 4; Table 2.2).

Baseline: Church of St Mary (Summers Town) (Grade II)

Description

The church (1903) is located on Keble Street, with a frontage to Wimbledon Road. It was designed by the architect Godfrey Pinkerton (1858-1937) who was known for ecclesiastical buildings, a National Westminster Bank in Brighton and St Edith's Hall and War Memorial, both separately listed, in Kemsing, Kent.

The massing of the church is loosely Gothic in appearance, with gable ends to the nave, chancel and alternate bays of the aisles which are arranged transeptally. The south tower to the chancel, which houses the organ loft, remains unfinished and is capped with a square hipped roof. The building is constructed of red brick, features light coloured stone dressings (which contrast the red brick) and has a tiled roof.

The east window is made to the designed of Edward Burne-Jones and was completed by Morris and Company in 1928.

Summary of Value

It has architectural value through its development of a restrained Gothic style. It has historical value through its relations to Godfrey Pinkerton, who is not of the architectural canon, but has a number of listed buildings to his name. Further value is added through the relation to Burne-Jones and Morris and Company.

Value: High

Contribution of Setting to Value

The church is located within a residential area. The character of the area provides a degree of understanding to the church through evidence of surrounding uses. The setting makes an overall neutral contribution to the significance of the listed building.

The church is best viewed from Keble Street looking east and from Hazlehurst Road looking north west.

Contribution of Site to Heritage Value through Setting

The Site does not contribute to the value of the listed building.

Assessment: Church of St Mary (Summers Town) (Grade II)

The susceptibility to the type of change proposed is Low. When combined with the value of the listed building, the sensitivity is Medium.

The Proposed Development is over 700m from the church. VuCity shows theoretical visibility on the ZTV from Wimbledon Road. The environment in this location is busy with traffic. Between the church and the Site are a number of buildings, a slope in topography and a number of mature trees. A sliver of the Proposed Development is theoretically visible, though in reality, this would not be perceivable at this distance or with the interposing development between the church and the Site.

In ES terms, the effects are as follows:

Magnitude of Impact: Nil; Likely Effect: None. The information to support this conclusion is here:

VuCity Extract of ZTV at St Mary's Summerstown and the Lodge (Grade II):



VuCity screenshot of limited visibility from the outside of St Mary Summerstown and the Lodge (Grade II); the church is highlighted in red and the Site is located to the north east. The model shots in the existing and proposed scenarios are provided below.

VuCity Model Shot 1: Church of St Mary Summerstown and the Lodge (Existing):



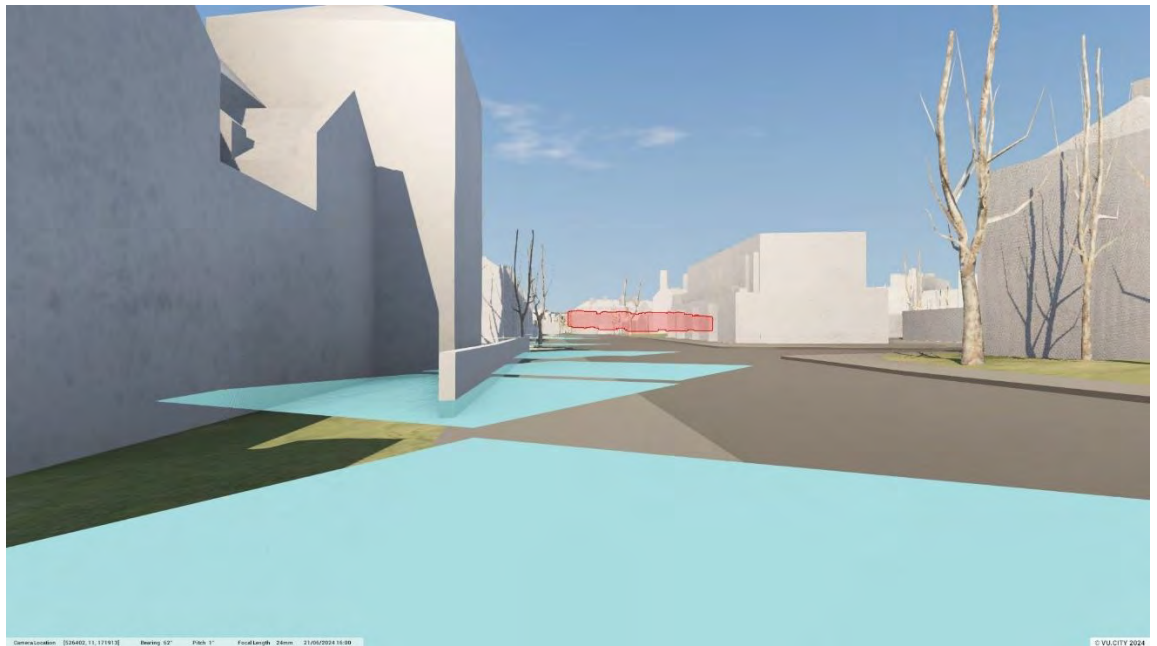
Google Streetview Reference of Existing Condition:



VuCity Model Shot 1: Church of St Mary Summerstown and the Lodge (Proposed):



VuCity Model Shot 1: Church of St Mary Summerstown and the Lodge (Proposed; The Proposed Development Highlighted):



Baseline: St Clement Danes Holborn Estate Almshouses and Chapel (Grade II)

Description

The Almshouses front Garratt Lane. They were designed and built between 1848 and 1849. They were designed by Robert Hesketh (1817-1880). Hesketh's RIBA nomination came in 1849, making the Almshouses an early solo work of his.

They are laid out in a typical U-shaped pattern, with gardens and a courtyard central to the planform. They appear as symmetrical in plan from the exterior with the chapel placed centrally to this plan. A series of two storey cottages span out from the chapel. These are Gothic Revival in style and constructed of red brick, with grey brick diapering. The roof is of slate tiles. The windows and detailing is in contrast to this and of a light coloured stone.

Summary of Value

The survival of the planform, around a central garden contributes to the Almshouses value. Value is derived from the Gothic Revival style and its relationship to the church, and subsequently its philanthropy. It has historical value through its age. Further value is added through its designs being by Robert Hesketh.

The Value in ES terms is High.

Contribution of Setting to Value

The layout of the Almshouses in a courtyard plan contributes to their setting. The ability to understand and appreciate this is best seen from Garratt Lane when looking at the chapel. This view was illustrated in the Illustrated London News on the completion of the Almshouses in 1849:



View of the Almshouses from Garratt Lane

Contribution of Site to Heritage Value through Setting

The Site does not contribute to the value of the listed building.

Assessment: St Clement Danes Holborn Estate Almshouses and Chapel (Grade II)

The susceptibility to the type of change proposed is Low. When combined with the value of the listed building, the sensitivity is Medium.

The Proposed Development is over 550m from the Almshouses. VuCity shows that there is theoretical visibility from Wimbledon Road, in combination with the northern wing of the Almshouses as well as theoretical visibility from its courtyard. The flash of visibility in the courtyard, on VuCity, appears severe. But at this distance, and as supported by the VuCity screenshots below, it is clear that the Proposed Development would not be noticed. Further to this, the mature trees at the edge of the Almshouses provides a dense coverage and is visually impermeable. Between the Site and the Almshouses, are further trees within Streatham Cemetery and the perimeter of the Site.

The visibility remains theoretical, though in reality, at this distance and taking into account the orientation of the Almshouses, the Proposed Development would be imperceptible from the courtyard. From the courtyard, any understanding of visual change is done so from a busy, urban environment, where viewers of the heritage asset are aware of such surroundings. From Wimbledon Road, this is accentuated further by trees, topography and interposing development. The Proposed Development would not be perceptible.

In ES terms, the effects are as follows:

Magnitude of Impact: Nil; Likely Effect: None. The information to support this conclusion is here:

VuCity Extract of ZTV at the Almshouses and Chapel of St Clements Danes (highlighted red):



The extracted ZTV analysis shows that there would be visibility from the entrance of the Almshouses. The Site is located to the north east of the Almshouses. The principal elevation is orientated north, north east, and is best appreciated from the north. From the north, large post-war towers are situated behind the Almshouses. The surroundings are characterised by mature trees. The foliage of which would screen any visibility of the Proposed Development from the courtyard. The surroundings are that of a very busy urban environment, with Garratt Lane connecting Wimbledon and Tooting Broadway spanning the route outside the Almshouses.

Principal Elevation of the Almshouses from Garratt Road:



Principal Elevation of the Almshouses from Garratt Road, as a VuCity screenshot:



VuCity Model Shot 2: Almshouses and Chapel of St Clements Danes along Wimbledon Road (Existing):



Almshouses and Chapel of St Clements Danes along Wimbledon Road (Streetview Reference):



VuCity Model Shot 2: Almshouses and Chapel of St Clements Danes along Wimbledon Road (Proposed):



VuCity Model Shot 2: Almshouses and Chapel of St Clement Danes along Wimbledon Road (Proposed; Proposed Development Highlighted):



6. Please note the comments of my colleague Charleen Henry, who requested an additional view from the cemetery and a Hi Res version of the existing HTVIA.

The existing and proposed scenarios of this view are provided in full at Appendix 2 and also below as viewpoint 14. The view has been provided in Wireline. The blue wireline is representative of the elements of the development which are within the MOL boundary. The green is elements which fall outside of the boundary.

For reference, these are the block titles referred to in the commentary below:



View 14: From the East of Streatham Cemetery (Existing)



The view is located to the south east of the Site and is within Streatham Cemetery. It is orientated north west towards the Site.

The view is within the MOL. The concrete fence that demarcates the Site's boundary terminates the sense of openness at the ground level. Beyond this is a dense belt of mature trees. When understanding this view in the round, the viewer would be aware of the surrounding suburban development with houses backing on to the cemetery. In winter months some built form (the Shaftesbury Clinic) on the Site would be seen through the base of the trees, due to the lack of foliage.

The greensward that characterises the appearance of the cemetery is kept short in the winter and is allowed to grow out in the summer. The memorials and gravestones that form part of the view evidence the cemetery's use; they are not individually listed or locally listed. The cemetery landscape is included on LBW's Local List.

The poor boundary treatment to the cemetery is seen in the mid ground. In winter months, the Shaftesbury Wing would be seen through the foliage and it is likely that elements of the Morrison Building, to the north, would be too.

The visual receptors will be pedestrians engaged in visiting the cemetery either for mourning or for leisure.

Value of the visual amenity: Medium

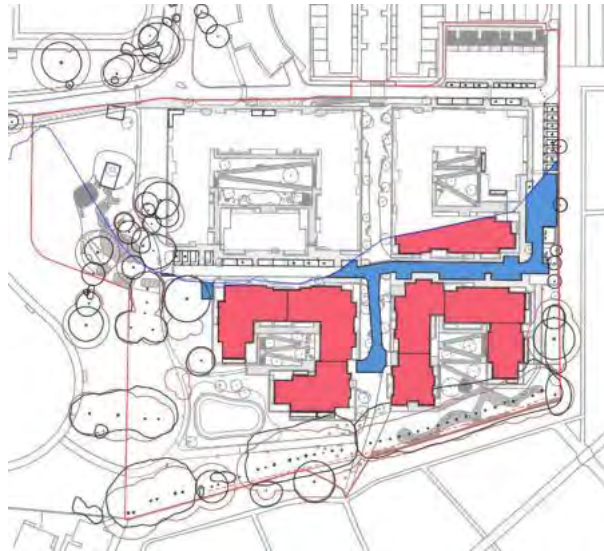
View 14: From the East of Streatham Cemetery (Proposed)



The susceptibility to change is Low. The sensitivity is Low/Medium. Using professional judgement, and understanding that the cemetery has distinct, built edge, the sensitivity to change is considered to be Low.

The view shows the Proposed Development in wireline. The blue wireline is representative of the elements of the scheme which are located within the MOL. The green is outside of MOL.

The elements of the south east side of the Site (Block B) are shown in this view. As seen from here, there is a broad edge of MOL within the Site, as the boundary heads northeast to join Streatham Cemetery. The townhouses would be screened by foliage, as would the taller elements to the north of the Site (Block D), which are not within the MOL.



The view is taken from the right side of this plan, to the south east of the Site

The Proposed Development occupies land where the buildings on the Site created an element of built character within the view. The plots at the southern end of the Site, within the MOL, would be seen above the treeline to a limited extent.

These plots that are within the MOL would likely be seen in winter behind the foliage of the trees. Through good design, the Proposed Development will recede into the backdrop of the view. Materially, the warm hues of the red brick and contrasting colours of the lighter brick at its corners enable the building to visually fade into the backdrop of the view. The metallic frames of the Proposed Development assist in the forms and materials of the building melding with the surrounding trees and hedges that enclose Streatham Cemetery. The quoins are visual references to the Grade II listed Springfield Hospital beyond (out of view) which seek to carry through the visual language of the listed building to the landscape's reaches.

The Magnitude of Impact would be Low, owing to the role the landscape and topography plays in screening the Proposed Development from view.

The Proposed Development would give rise to a Minor Likely Effect (not significant). The Nature of Effect would be Neutral; good design and the continued definition of built edge, outside of the MOL, balances any perceived impact on openness that would be noticed.

7. *The HIA should briefly address the heritage interest (if any) of the Diamond Estate (1970s nurses housing), the Shaftesbury Building (1980s or 1990s forensic wing) and the Morrison Building (late 1920s hospital building), with brief details of their dates of construction and architects. Our initial sense is that only the Morrison Building is of any interest, and we may require a recording condition on this building in due course.*

For background, the Elizabeth Newton Wing was listed in 1997 by English Heritage (as Historic England was then known); as part of this designation, a series of buildings at Springfield Hospital were assessed for listing including the Morrison Building (referred to as the ABCD Building at the 2012 appeal); Hebson Lodge; Glenburnie Gatehouse; White Lodge; and part of the Elizabeth Newton Wing, with only the Elizabeth Newton Wing being deemed of special enough interest historically and architecturally to warrant listing.

The Diamond Estate and Shaftesbury Clinic do not have any levels of heritage significance. The Morrison Building is separate to these buildings and shares a sense of the character and appearance of other buildings

at Springfield Hospital. However, it does not possess the same levels of architectural or historic value as the listed buildings. It is concluded that it has no heritage significance.

This section provides the baseline heritage information for the highlighted buildings as well as a conclusion on their heritage interest.

The 2012 Appeal decision granted permission to demolish the Diamond Estate, Shaftesbury Clinic and the Morrison Building.

The Diamond Estate

The Diamond Estate, a group of 21 residential buildings, was built 'around 1986' (as cited in Barry Sellars', LB Wandsworth's Conservation Officer, Proof of Evidence for the 2012 Appeal), likely named after Dr Hugh Welch Diamond (1807-1886), who was the Resident Superintendent of the Female Department at Springfield Hospital between 1849 and 1858. The estate was built on MOL and during the period of Crown Immunity, which ceased in 2006, where the Trust did not require planning permission for development on the site.

Paragraph 4.21, in Section 4.0 Historical Development, of the Submitted HTVIA states that:

Maps show that the Diamond Estate was built between 1977 and 1989 and occupies much of the southern corner of the hospital site. The Shaftesbury Clinic occupies this part of the Site, to the north of the Diamond Estate, and was built in the immediate post-war period. Both are sited within what is now designated as MOL.

Paragraph 5.34 of the Baseline: Built Heritage (Submitted HTVIA) mentions the Diamond Estate in relation to its contribution to Springfield Hospital (Grade II) by virtue of being in its setting. It states:

The current condition of the Site makes an overall neutral contribution to the significance of the Springfield Hospital Main Building (Grade II). In views from the cemetery, the Diamond Estate (currently on the Site) screens visibility of the Springfield Hospital complex, therefore creating a physical, built barrier between the Registered Park and Garden, the Cemetery and the Hospital.

The Diamond Estate does not have heritage significance.

Shaftesbury Clinic

The Shaftesbury Clinic was built 1992 (as cited in Barry Sellars', LB Wandsworth's Conservation Officer, Proof of Evidence for the 2012 Appeal). It was built under Crown Immunity. It is likely that, given its specific use as the secure forensic service of the Trust, that its architects would have been specialists in hospital planning. The building was not assessed within the HTVIA for having heritage significance given its age, utilitarian appearance and function.

The Shaftesbury Clinic does not have heritage significance.

Morrison Building

The Morrison Building is a two-storey building accessed along Jupiter Way, to the immediate south of Springfield Hospital (Grade II) and to the south west of the Elizabeth Newton Wing (Grade II). It is likely named after Alexander Morrison who was a physician working in the Surrey asylums at the time of Springfield Hospital's completion in 1841, who assessed all 299 of the admitted patients when it first opened. It was built in c.1931 as an infirmary block to treat mentally ill patients who were also physically ill.

The building is constructed from a similar palette of materials to that of the Elizabeth Newton Wing, and appears on the OS Map of 1948. As established in 2012, it is considered to not be of architectural or historic interest; its demolition was deemed acceptable.

The Morrison Building is separated from the Springfield Hospital Building by dense foliage associated with airing gardens, which form part of the Springfield Hospital (Grade II, Registered Park and Garden). This separation, and likely different uses of the Morrison Building (this was an Infirmary Block) to the main hospital building, waters down its spatial and historical relationship.

The Morrison Building does not have heritage significance.

8. *At Stage 3 the GLA will be assessing impacts on the settings of Non-Designated Heritage Assets (if any). The existing HTVIA covers this, but I would be grateful if you could check that all the relevant NDHAs are included (to avoid any late requests for information).*

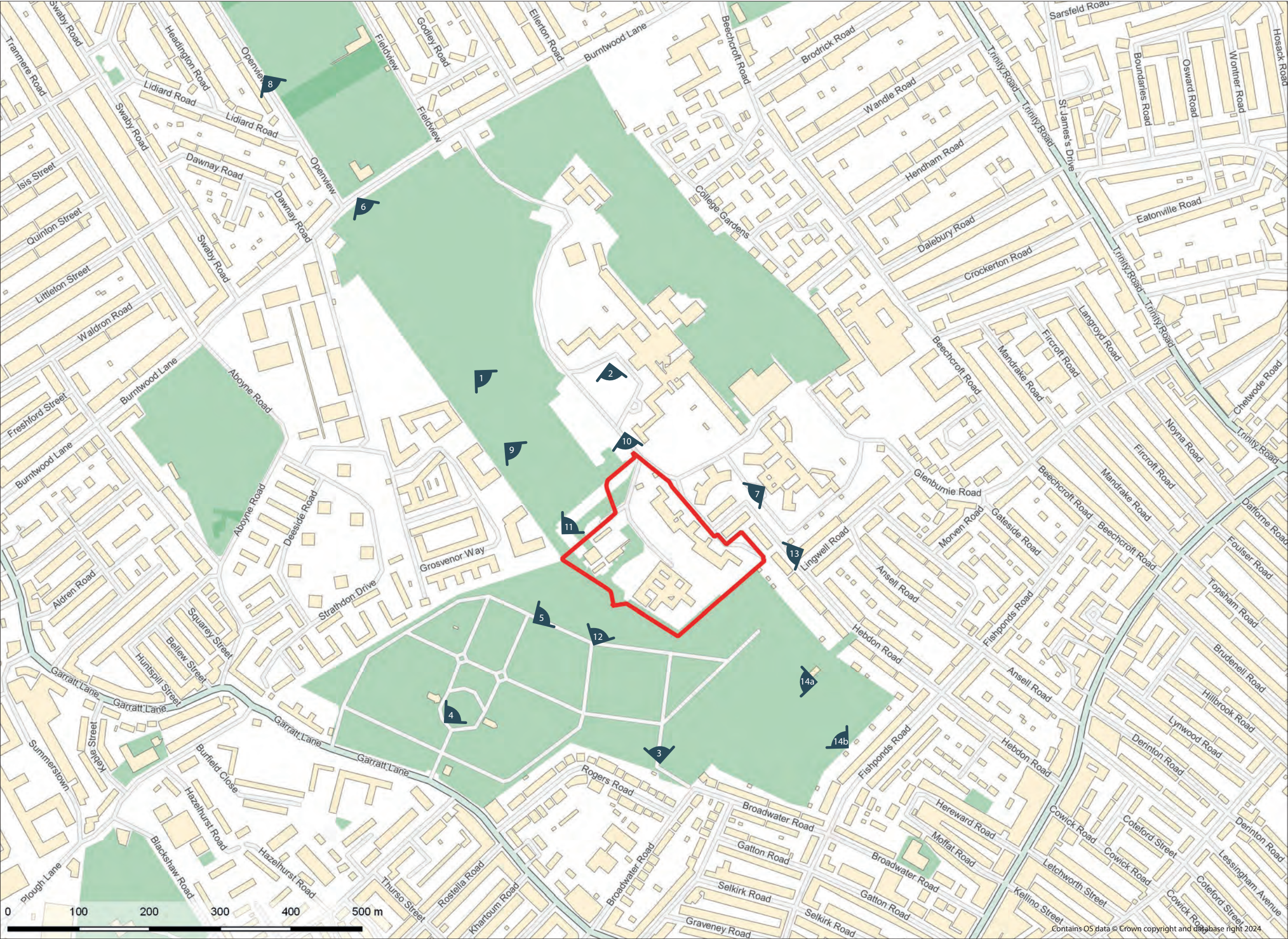
There is a section on NDHAs in the HTVIA. This section includes Streatham Cemetery (Locally Listed) and includes an assessment on the chapels as a part of this. The development Site is screened from the assets and their setting is the cemetery. Our conclusion was that the presence of the development would not erode any significance derived from setting. 61 Springfield Hospital (Locally Listed) this was a chapel; this is subsumed within the masterplan and development of the hospital. It also assessed Garratt Green (Locally Listed) which is an open space in Wandsworth, to the east of the main building. It was not impacted by the Proposed Development. No other NDHAs need consideration.

4.0 CONCLUSION

- 4.1 This document provides a series of clarifications sought by the GLA in order to determine an application called in by the GLA at Springfield Hospital.
- 4.2 No further information has been brought to light, or any further potential impacts to heritage, townscape and visual impact found in the Submitted HTVIA.
- 4.3 This note provides policy analysis for the now adopted Wandsworth Local Plan (2023). The numbering of the NPPF paragraphs has been updated to reflect the current iteration.
- 4.4 The findings of the Submitted HTVIA therefore remain valid.
- 4.5 This HTVIA Addendum should read in conjunction with the Heritage Impact Assessment (HIA). The HIA provides the findings of the ES heritage section and clarifies these in NPPF language.

APPENDIX 1.0

UPDATED AVR_s (PRODUCED BY AVR LONDON)



VIEW LOCATION PLAN

- Application Site
- 1. Springfield RPG
- 2. Entrance of Springfield Hospital
- 3. Streatham Cemetery (1)
- 4. Streatham Cemetery (2)
- 5. Streatham Cemetery (3)
- 6. Burntwood Lane
- 7. Entrance of Elizabeth Newton Wing
- 8. Openview
- 9. Springfield Hospital on axis with hospital
- 10. South Wing of Springfield Hospital
- 11. Springfield Hospital Car Park (south west)
- 12. Streatham Cemetery (4)
- 13. Hebdon Road at John Hunter Drive
- 14a. Streatham Cemetery
- 14b. Streatham Cemetery

LOCATION:
Glenburnie Rd, London SW17 7DJ

DATE:
August 2024

SCALE:
1:5,500 @ A3

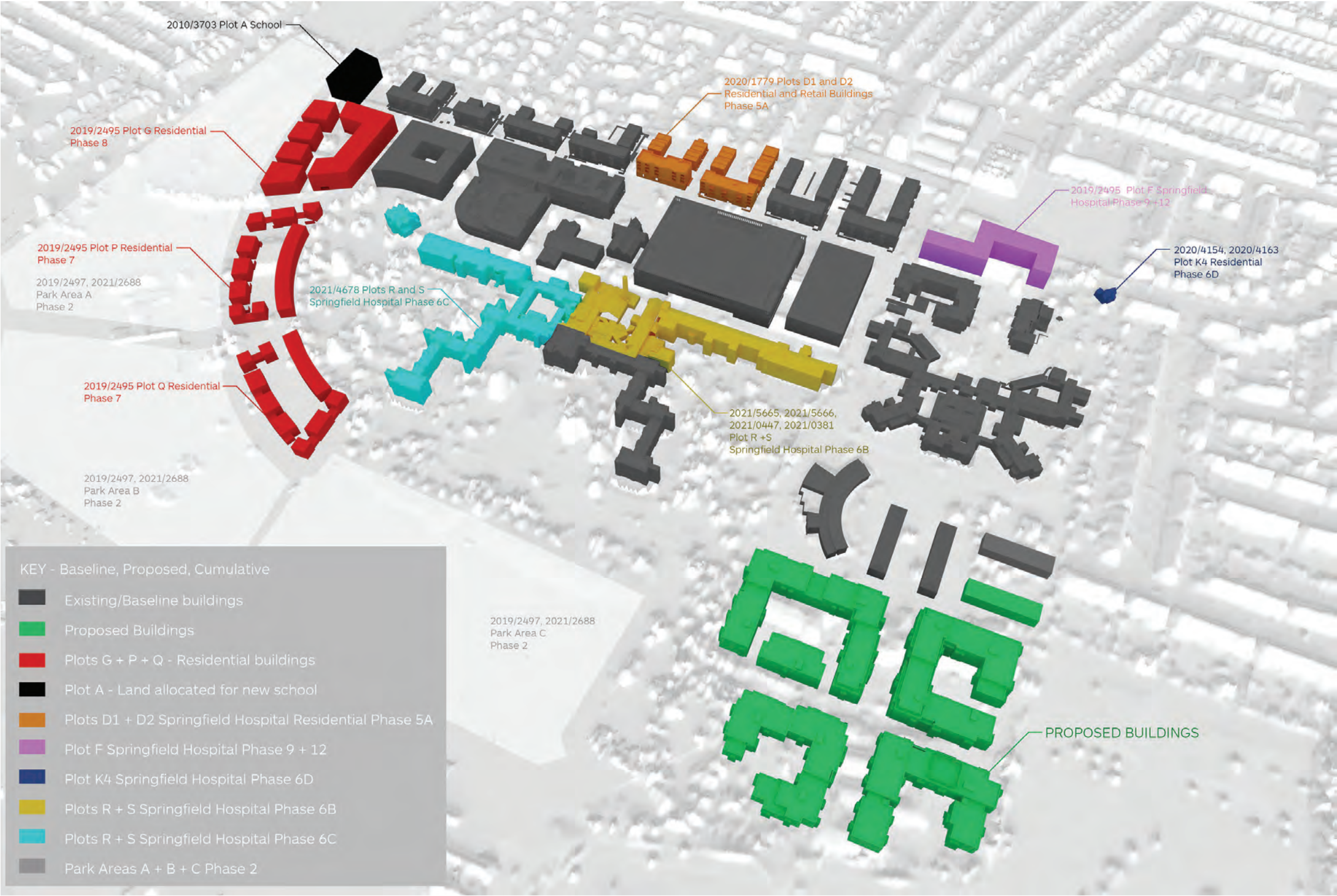
FIGURE:

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Cumulative Key



View 1 Springfield RPG
Existing



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 1 Springfield RPG
Proposed



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 1 Springfield RPG
Proposed (MOL)
Note the blue wireline represents buildings within the MOL



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 1 Springfield RPG
Cumulative



© AR LONDON

Preliminary Alignment

1.6 m above ground

13:53 31 July 2024

View 6 Burntwood Lane
Existing



XXXXXX_PP_103_NAIVE_LOCATION_XXXXXX.MXD

View 6 Burntwood Lane
Proposed



View 6 Burntwood Lane
Proposed (MOL)
Note the blue wireline represents buildings within the MOL



XXXXXX_PP_JOB_NAME\LOCATION\XXXXXX.MXD

View 6 Burntwood Lane
Cumulative



© **AVR** LONDON

Preliminary Alignment

1.6 m above ground

14:03 31 July 2024

View 9 Springfield Hospital
Existing



© AR LONDON

Preliminary Alignment

1.6 m above ground

13:28 31 July 2024

View 9 Springfield Hospital
Proposed



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

**View 9 Springfield Hospital
Proposed (MOL)**
*Note the blue wireline represents buildings
within the MOL*



View 9 Springfield Hospital
Cumulative



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 10 South Wing of
Springfield Hospital
Existing



© AR LONDON

Preliminary Alignment

1.6 m above ground

07:45 12 August 2024

View 10 South Wing of
Springfield Hospital
Proposed



XXXXXX_PP_JOB NAME\LOCATION_XXXXXX.MXD

**View 10 South Wing of
Springfield Hospital
Proposed (MOL)**
*Note the blue wireline represents buildings
within the MOL*



© AR LONDON

Preliminary Alignment

1.6 m above ground

07:45 12 August 2024

View 10 South Wing of
Springfield Hospital
Cumulative



© AR LONDON

Preliminary Alignment

1.6 m above ground

07:45 12 August 2024

APPENDIX 2.0

REQUESTED VIEW FROM THE EAST OF
STREATHAM CEMETERY (EXISTING AND
PROPOSED)

View 14a Streatham
Cemetery
Existing



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 14a Streatham
Cemetery
Proposed



XXXXXX_PP_JOB_NAME\LOCATION_XXXXXX.MXD

View 14a Streatham
Cemetery
Proposed (MOL)
Note the blue wireline represents buildings within the MOL



XXXXXX_P01_JOB NAME/LOCATION_XXXXXX.MXD

View 14a Streatham
Cemetery
Cumulative



View 14b Streatham
Cemetery
Existing



XXY001_PP_008 NAME LOCATION XXY001

View 14b Streatham
Cemetery
Proposed



View 14a Streatham
Cemetery
Proposed (MOL)
Note the blue wireline represents buildings within the MOL



View 14a Streatham
Cemetery
Cumulative



APPENDIX 3.0

UPDATED AVR METHODOLOGY (PRODUCED BY
AVR LONDON)



PROJECT: Springfield Hospital
DATE: August 2024

AVR London were commissioned to produce a number of verified views of the proposals at Springfield Hospital. AVR positions were identified by the planning consultant.

2D plans, Ordnance Survey Mapping, local survey data, and the 3D model for the proposed development were provided by the architect.

PHOTOGRAPHY

Equipment:

Canon EOS R5
Canon TS-E 24mm f/3.5L II

1.1 All photography is undertaken by AVR London’s in-house professional photographers.

1.2 In professional architectural photography, having the camera level with the horizon is desirable in order to prevent three point perspective being introduced to the image and to ensure the verticals within the photographed scene remain parallel. This is standard practice and more realistically reflects the viewing experience.

1.3 The lens used by the photographer has the ability, where necessary, to shift up or down while remaining parallel to the sensor, allowing for the horizon in the image to be above, below or central within the image whilst maintaining two point perspective. This allows the photographer to capture the top of a taller proposed development which would usually be cropped, without introducing three point perspective.

When the shift capability of the lens is not used the image FOV and dimensions are the same as a prime lens of equal focal length.

1.4 Once the view positions are confirmed by the

townscape consultant, AVR London takes professional photography from each location. At each location the camera is set up over a defined ground point using a plumb line to ensure the position can be identified later.

1.5 The centre of the camera lens is positioned at a height of 1.60 metres above the ground to simulate average viewing height. For standard verified photography, each view is taken with a lens that gives a 68 degree field of view, approximately, a standard which has emerged for verified architectural photography. The nature of digital photography means that a record of the time and date of each photograph is embedded within the photo file; this metadata allows accurate lighting timings to be recreated within the computer model.

1.6 Once the image is taken, the photographer records the tripod location by photographing it in position to ensure the position can be accurately located for surveying (Fig 02).

1.7 Each image is processed by the photographer to ensure it visually matches the conditions on site when the photograph is taken.

REGARDING 24mm FOCAL LENTH IN AN URBAN ENVIRONMENT

1.8 The Landscape Institute Technical Guidance Note [2] states:

1.5.5 ‘When regulatory authorities specify their own photographic and photomontage requirements, the landscape professional should follow them unless there is a good reason not to do so.’

1.9 The London View Management Framework: Supplementary Planning Guidance (2012) Appendix C: Accurate Visual Representation [1] sets out a well-defined and verifiable procedure for preparing Accurate Visual Representations as part of the assessment of the visual impacts of proposed developments. As the LVMF aims to protect the most significant views in London, the guidance set out in Appendix C is considered best practice within the industry.

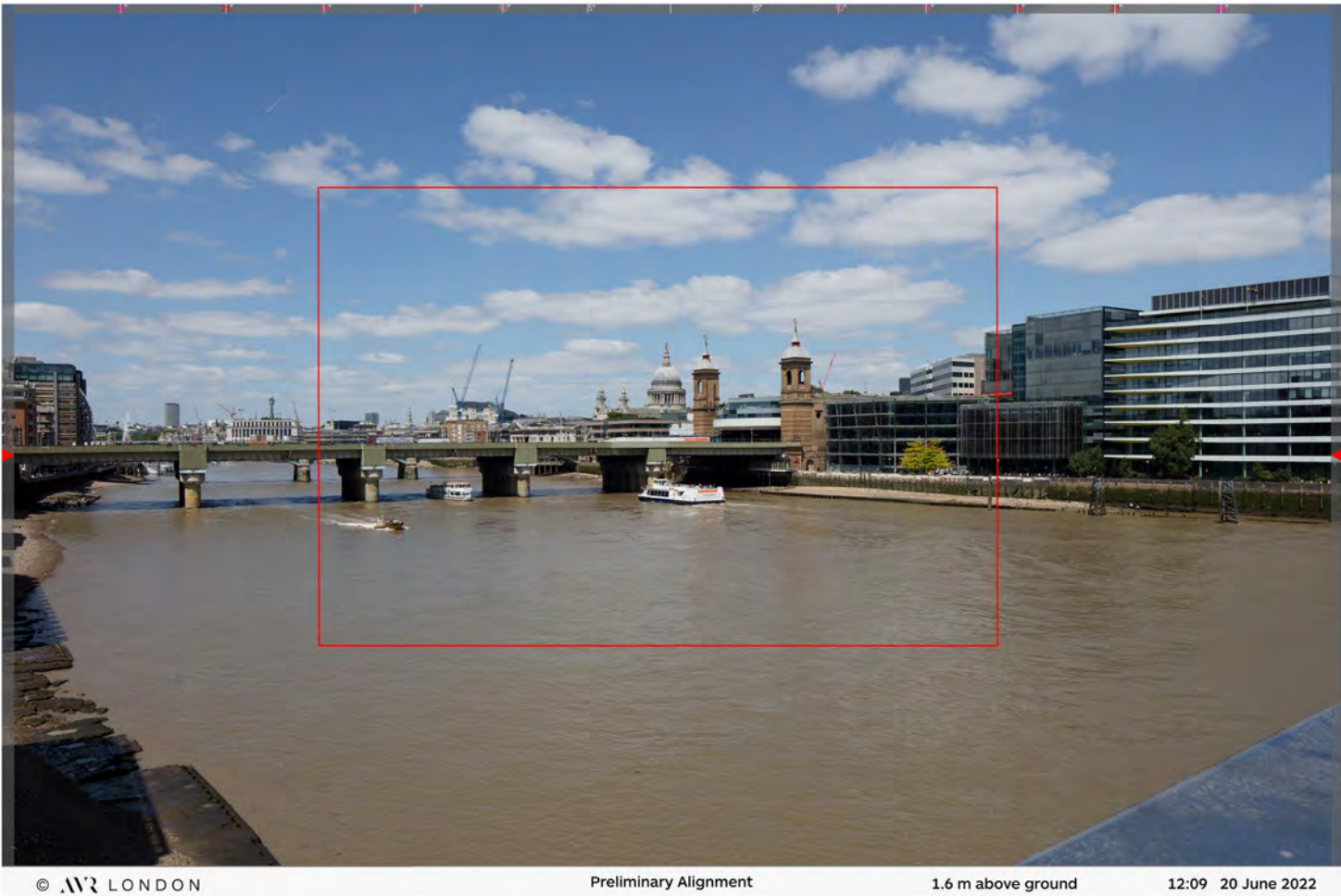


Fig 01: 24mm photograph with 50mm photograph overlaid

The LVMF guidance indicates that creators of AVRs should use the appropriate lens for each study, which could include wide angle lenses (wider than 50mm) or telephoto lenses (more zoomed than 50mm), where necessary.

Over time the 24mm lens has become the industry standard in urban visualisation due to its ability to capture context with limited distortion.

Given the Landscape Institute’s advice to follow the authorities’ own requirements, where applicable, AVR London follows the LVMF guidance.

1.10 When we observe a scene, we can focus on 6-10 degrees. However, without moving our head, the scene

beyond is observed using our peripheral vision. Once we move our eyes we can observe almost 180 degrees without moving our head. In reality we do not view the world through one fixed position, we move our eyes around a scene and observe, height, width and depth.

1.11 This is acknowl-ged by the Landscape Institute’s Technical Guidance Note [2]. The appreciation of the wider context seen through peripheral vision or by moving our eyes (changing the focal point) is key to our experience of a scene.

While photography cannot replicate the human experience entirely, it is widely acknowledged that the use of a 24mm lens in an urban environment provides the viewer with a more realistic experience

than a 50mm lens. For these reasons the 24mm lens is industry standard in the creation of urban photo montages. It should also be noted that using a consistent focal length is favourable so as not to confuse the viewer’s sense of scale.

50mm LENS/CROP

1.12 It should also be stressed that if you were to centrally crop into an image taken with a 24mm lens to the same HFOV (Horizontal Field Of View) as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. An image with a 70 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), the 24mm lens purely gives more context to all sides (Fig 01). Further, all of our images allow this 50mm equivalent HFOV to be seen, read and understood on the image itself.

The benefit of using images taken with a 24mm lens is that the observer and in particular an experienced inspector, is able to analyse the image with the benefit of both fields of view.

POINT	EASTING	NORTHING	HEIGHT
AVR01	526827.179	172499.918	17.605
101	526997.28	172526.977	36.796
102	527009.997	172502.845	33.073
103	527118.01	172410.574	30.719
104	527107.261	172329.792	30.461
105	526901.123	172420.849	23.931
106	526905.622	172423.312	18.871
107	526883.15	172459.097	17.844
108	526873.083	172487.317	17.583
109	526833.503	172497.497	17.425
110	526834.979	172499.487	17.42
111	526893.986	172515.098	18.807

Table 1: Example surveying data



Fig 02: Tripod location as documented by photographer



Fig 03: Survey points as highlighted by surveyor



Fig 04: Example AVR London graticule

SURVEY

Equipment:

- Leica Total Station Electronic Theodolite which has 1” angle measuring accuracy and 2mm + 2ppm distance accuracy.
- Leica Smart Rover RTK Global Positioning System.
- Wild/Leica NAK2 automatic level which a standard deviation of +/- 0.7mm/km

2.1 The photographer briefs the surveyor, sending across the prepared photographs, ground positions and appropriate data.

2.2 The surveyor establishes a line of sight, two station baseline, coordinated and levelled by real time kinetic

GPS observations, usually with one of the stations being the camera location. The eastings and northings are aligned to the Ordnance Survey National Grid (OSGB36) and elevation to Ordnance Survey Datum (OSD) using the OSTN15 GPS transformation program.

2.3 Once the baseline is established, a bearing is determined and a series of clearly identifiable static points across the photograph are observed using the total station. These observations are taken throughout the depth of field of the photograph and at differing heights within the image.

2.4 The survey control stations are extracted from the OS base mapping and wherever possible, linked together to form a survey network. This means that survey information is accurate to

tolerances quoted by GPS survey methods in plan and commensurate with this in level.

2.5 Horizontal and vertical angle observations from the control stations allow the previously identified points within the view to be surveyed using line of sight surveying and the accurate coordination of these points determined using an intersection program. These points are then related back to the Ordnance Survey grid and provided in a spreadsheet format showing point number, easting, northing and level of each point surveyed, together with a reference file showing each marked up image (Fig 03 and Table 1).

2.6 The required horizon line within the image is established using the horizontal collimation of the theodolite (set to approximately above the ground) to identify 3 or 4 features that fall along the horizon line. The theodolite more generally is used for measuring angles and distances.

2.7 Using the surveyed horizon points as a guide, each photograph is checked and rotated, if necessary, in proprietary digital image manipulation software to ensure that the horizon line on the photograph is level and consistent with the information received from the surveyor.

Accurate Visual Representation Production

Process

3.1 The 3D computer model is precisely aligned to a site plan on the OS coordinate grid system.

3.2 Within the 3D software a virtual camera is set up using the coordinates provided by the surveyor along with the previously identified points within the scene. The virtual camera is verified by matching the contextual surveyed points with matching points within the overlaid photograph. As the surveyed data points, virtual camera and 3D model all relate to the same 3-dimensional coordinate system, there is only one position, viewing direction and field of view where all these points coincide with the actual photograph from site. The virtual camera is now verified against

the site photograph.

3.3 For fully-rendered views a lighting simulation (using accurate latitude, longitude and time) is established within the proprietary 3D modelling software matching that of the actual site photograph. Along with the virtual sunlight, virtual materials are applied to the 3D model to match those advised by the architects. The proprietary 3D modelling software then uses the verified virtual camera, 3D digital model, lighting and material setup to produce a computer generated render of the proposed building.

3.4 The proposal is masked where it is obscured behind built form or street furniture.

3.5 Using the surveyed information and verification process described above, the scale and position of a proposal within a scene can be objectively calculated. However, using the proprietary software currently available the exact response of proposed materials to their environment is subjective so the exact portrayal of a proposal is a collaboration between illustrator and architect. The final computer generated image of the proposed building is achieved by combining the computer-generated render and the site photography within proprietary digital compositing software.

Presentation

Graticule

4.1 Each Accurate Visual Representation is framed by a graticule which provides further information including time and date of photography, horizon markers and field of view of the lens (Fig 04).

4.2 The Field of View is represented along the top of the image in the form of markers with degrees written at the correct intervals.

4.3 The horizon markers indicate where the horizontal plane of view from the camera lies. (section 2 above explains how the surveyor establishes these horizon points).

4.4 The date and time stamp documents exactly when the photograph was taken. This data is recorded in every digital camera file, known as EXIF data.

6. PUBLISHED GUIDANCE

6.1 The Landscape Institute, states in “Visual Representation of Development Proposals - Technical Guidance Note (September 2019)”, that:

“The LI recognises that, for some types of development, targeted or authority-specific guidance may be appropriate.”

“The London View Management Framework provides useful guidance for large-scale urban development, and is particularly useful in identifying what it refers to as ‘AVR Types’ (0 - 3)”

6.2 We agree with the Landscape Institute and it is broadly accepted across the industry that the London View Management Framework Guidance, Appendix C: Accurate Visual Representations outlines best practice for producing Accurate Visual Representations of urban developments.

The framework was set up to protect London’s most important views and has been used as the industry standard for all significant strategic developments in the capital since. The LVMF Guidance was the subject of full consultation with the local authorities in London and other bodies such as Historic England and Historic Royal Palaces.

The following, outlines the key reasons why LVMF guidelines for urban development are recommended:

Field of View (FOV) and Lens Selection

6.3 It is outlined in the guidance (Point 467) “As we experience a scene, our perception is built from a sophisticated visual process that allows us to focus onto individual areas with remarkable clarity whilst remaining aware of a wider overall context.” For this reason a 50mm lens with a FOV of 40 degrees is not appropriate in a built environment. In comparison a 24mm lens with a FOV of 70 degrees allows the viewer

to appreciate and understand urban context.

Tilt/Shift Lens

6.4 A tilt/shift lens allows the axis of the lens to be moved vertically or horizontally in order to avoid distortion and thus to replicate more closely the complex manner in which human vision is interpreted into an image in our mind.

Due to the complex nature of these lenses, they are of a much higher quality and cost compared to standard lenses and do not have any distortion, barrel/pin cushion effect that lenses of a lesser quality often have. Despite their complexity and cost, the ability to control the viewing centre of an image without any distortion has made these lenses essential to professional photographers, especially in the discipline of architecture in urban environments.

It should be stressed that AVR London only use the shift function of the lens and this is only shifted in the vertical direction. This is simply to allow us to compose images to better demonstrate the view and the proposal’s place within it without introducing 3-point perspective distortion (converging verticals) and to closer replicate how our mind interprets and corrects for such (Fig 04).

Not only is the use of tilt shift lenses standard practice within architectural photography, it is also standard practice throughout all the established professional practices conducting verified images in London. The LVMF guidance itself uses a vertical rise image as its main image of explanation in the Annex identifying good practice (Fig 05).

50mm Lens/Crop

6.5 It should also be stressed that if you were to centrally crop into an image taken with a 24mm lens to the same HFOV as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. This is often misunderstood. An image with a 70 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), the 24mm lens purely gives

more context to all sides (Fig 06). Further, all of our images allow this 50mm equivalent HFOV to be seen, read and understood on the image itself. The reader and in particular an experienced inspector can then make a judgment with the benefit of both fields of view.

Stitching and Accuracy

6.6 A 24mm lens captures enough context that it almost always possible to use one photograph to capture a view position. This ensures stitching of multiple images will not be required, on the rare occasion that 24mm FOV is not wide enough a diptych or triptych is preferable, again this is to avoid stitching of images together.

Stitching images together introduces inaccuracies and distortion in to the photograph and leads to a composite of blended perspectives.

It is always more accurate to verify a single photograph compared to a stitched image. Stitched images are impossible to replicate using the same methodology compared with single photographs as the stitching is either done by hand with causes variation or by automated programs which may also introduce variation.

Proven History

6.7 AVR London has used this methodology, aligned with the London View Management Framework, for planning applications in every London borough, throughout the UK from Cornwall to Scotland and Northern Ireland and as far afield as Sydney, Australia without question.

AVR London have also presented work using this methodology at numerous planning inquiries without question.

Research and Future Developments

6.8 AVR London have always undertaken research in to new areas of technology within the industry and this includes within the verified workflow. Given the previous stated issues surrounding stitched

photography we have worked on various research projects and developed a separate methodology to ensure 360 degree photography can be fully verified and viewed within a headset where appropriate. This accuracy has been tested and proven at planning inquiry.

Notes:

AVR 10 chalk rendering:
Foreground landscape including trees and foliage have been modelled from Architects drawings as supplied. Existing tree heights have been calculated using 3d data captured from Google Earth and Site Photography. The base photography for AVR 10 shows some existing trees immediately in front of the proposal, some of which are to be removed to make way for the building footprint. In this case the existing trees have been removed from the photography and 3d model trees superimposed on top of the building to show the anticipated level of tree cover. It should be noted that the depiction of trees and foliage in this way is for illustrative purposes only and landscaping shouldn’t be seen as being verified.

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APPENDIX 4.0

HERITAGE IMPACT ASSESSMENT

Appendix 4: Heritage Impact Assessment

1.0 Introduction

- 1.1 BDW Trading Limited and STEP Springfield Village Limited have commissioned this Heritage Impact Assessment (HIA) in response to a request from the Greater London Authority's (GLA) Principal Conservation Officer in relation to the Submitted Application (LBW Ref: 2022/5288) at Springfield Hospital, Glenburnie Road, London, SW17 7DJ (the 'Site').
- 1.2 The Submitted HTVIA formed part of an Environmental Statement (ES). The terminology used in that report is consistent with the wider ES, as prepared by Trium Environmental Consulting, and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations').
- 1.3 This HIA therefore provides no further information but provides clarifications for the Principal Conservation Officer. Its main purpose is to provide the ES findings and translate these into the terminology consistent with the NPPF.
- 1.4 The heritage information in the submitted HTVIA identifies the assets (designated and non designated), defines their significance, and assesses whether or not the proposals harm the heritage assets. The HTVIA also comprises a heritage policy assessment. The purpose of this appendix is to translate the HTVIA findings into the language of the framework.

2.0 Translation of Submitted HTVIA to NPPF Language

- 2.1 The following section translates the ES findings into the language used in the NPPF. Paragraph 212 states 'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.' The following table confirms the findings of the ES, demonstrating that the Elizabeth Newton Wing (Grade II) would be better revealed, through the addition of an avenue leading up to its frontage.
- 2.2 The Baseline condition, provided in Section 5.0 Baseline Heritage Receptors in the Submitted HTVIA, establishes what contributes to the significance of heritage assets, what setting contributes to this, and what the Site in the existing condition contributes to setting. The Assessment, provided in Section 11.0 Assessment: Heritage Receptors, assesses the proposals against that Baseline condition. The written, qualitative elements, of the existing condition and assessment remain extant.
- 2.3 The framework defines conservation as the avoidance of harm or as appropriate the delivery of enhancement to significance.
- 2.4 We do not find any harmful impacts to heritage assets within the wider setting of the Site.
- 2.5 A summary of effects found in ES terms, which have been put into the comparable NPPF terms, is applied in the table below (map reference refers to the Heritage Asset Plan within the Submitted HTVIA):

Map Ref	Heritage Asset	Submitted HTVIA (ES) Finding (Proposed)	Submitted HTVIA Finding in NPPF Terms (Proposed)	Submitted HTVIA (ES) Finding (Cumulative)	Submitted HTVIA Finding in NPPF Terms (Cumulative)
Listed Buildings					
1	Elizabeth Newton Wing (Grade II)	Negligible Beneficial	Preserved (Enhancement)	Negligible Beneficial	Preserved (Enhancement)
2	Springfield Hospital Main Building (Grade II)	Negligible Neutral	Significance Preserved (No Harm)	Negligible Neutral	Significance Preserved (No Harm)
3	Icehouse at Springfield Farm (Grade II)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
4	Ensham Secondary School (Grade II)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
5	Lodge to St Clement Danes Almshouses (Grade II)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
Conservation Areas					

A	Magdalen Park Conservation Area	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
B	Wandsworth Common Conservation Area	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
Locally Listed Buildings and Non Designated Heritage Assets					
6	Streatham Cemetery (Locally Listed)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
7	61 Springfield Hospital (Locally Listed)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
8	Garratt Green (Locally Listed)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
12	Springfield Hospital (Grade II; Registered Park and Garden)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)

Table 2.1 Findings of the Submitted HTVIA in the terms of the NPPF

Heritage Asset	Submitted HTVIA (ES) Finding (Proposed)	Submitted HTVIA Finding in NPPF Terms (Proposed)	Submitted HTVIA (ES) Finding (Cumulative)	Submitted HTVIA Finding in NPPF Terms (Cumulative)
Listed Buildings				
Church of St Mary (Summers Town) (Grade II)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)
St Clement Danes Holborn Estate Almshouses and Chapel (Grade II)	None	Significance Preserved (No Harm)	None	Significance Preserved (No Harm)

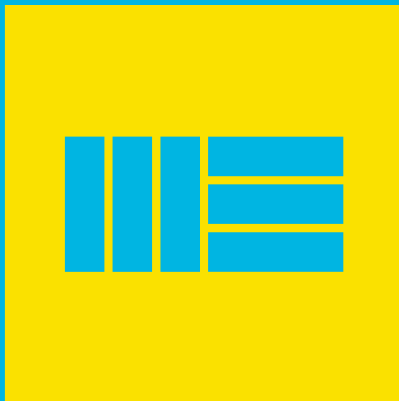
Table 2.2 Findings of the additional heritage assets assessed in Clarification 5 in the Addendum

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.