Our reference: MGLA131124-4779

MGLA131124-4814

2 December 2024

Dear

Thank you for your further items of correspondence which the Greater London Authority (GLA) received on the 12 and 13 November 2024. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

MGLA131124-4779

I'm not clear on what the differences were as against the documentation that had previously been reviewed in the context of the earlier stage conclusion that the height was excessive. Please could you provide a side by side comparison of the relevant images / descriptions upon which the conclusion that the building heights is in fact not excessive was based, and any reasoning / documentation that supports the complete reversal of the original conclusion? It's just very difficult to understand how the same building height can become acceptable when it was previously concluded to be excessive, so perhaps we're missing something. We've reviewed the available documentation and cannot find the supporting evidence or reasoning.

*excessive and harmful

MGLA131124-4814

Thanks for your email. I'm still not clear which images you're referring to. Please could you point to specific images / page numbers?

My FOI request also requested information supporting the decision - I have not been provided with any such documents, e.g. emails, minutes of meetings or calls. I appreciate that you've listed a number of items that were considered but that doesn't actually address my request, which was around the decision-making and anything that specifically supported the U-turn in the decision. Given it is such a stark reversal of position, I would expect there to be some detailed written analysis and evidence to support it, and this is what I have requested to be provided under the Act.

Our response to your request is as follows:

Firstly, I would like to clarify with you that the Freedom of Information Act and Environmental Information Regulations provides access to recorded information held at the time a request is received. It does not oblige public authorities to create new information in order to respond to queries arising:

You do not have to create new information in response to a request. FOIA only applies to any recorded information which you already held at the time of a request¹.

We are therefore not required to access the VuCity model and provide new views for a site-by-site comparison. The updated views in the HVTIA addendum are like the original 2022 views but are of images taken in July and August 2024 reflecting the current conditions of the site (Please find attached).

Please see attached correspondence with UD and conservation officers with their positions on height that informed the discussion in the report.

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

¹ Request handling, Freedom of Information – Frequently Asked Questions | ICO



Site and Site Context

The Springfield Hospital Phase 2B Application is an important opportunity to deliver both the final piece of the comprehensive redevelopment of Springfield Village, granted 12 years ago and utilises private investment to fund NHS estate regeneration.

This proposal will deliver 449 new residential homes, of which 50% are affordable tenure with a 50% split between affordable and intermediate flats on a habitable room basis which equates to 95 Social Rent flats and 125 shared ownership flats. The capital receipt which the Applicant pays to the NHS will assist in the delivery of a new mental health facility at Tolworth Hospital in the Royal Borough of Kingston upon Thames (RBKUT). The proposal will also complete the new public park and forms a connection between two pieces of Metropolitan Open Land, enabling them to deliver improved access and amenity.

The Springfield Hospital Masterplan

The Trust have embarked on an ambitious Estate Modernisation Programme (EMP) which seeks to invest in services, people and environment to ensure the highest quality of care can be delivered both within refurbished and new mental health facilities across South West London. This includes the delivery of the services within Springfield Hospital and Tolworth Hospital. The EMP represents major innovation and investment in the local community and by 2025 will help transform mental health services in South West London

Outline planning permission was granted in 2012 at appeal (under reference: APP/H5960/A/11/2156427 & APP/H5960/A/11/2156424) for the Springfield Hospital redevelopment which permitted the delivery of a new state of the art mental health facility, 839 residential flats, a new care home, school, retail floorspace and a publicly accessible park.

In 2017, the South West London and St George's Mental Health NHS Trust selected its preferred master developer, STEP, which is partnership between Sir Robert McAlpine Capital Ventures and Kajima Partnerships. Works in relation to the delivery of the new hospital facility and infrastructure began in early 2019.

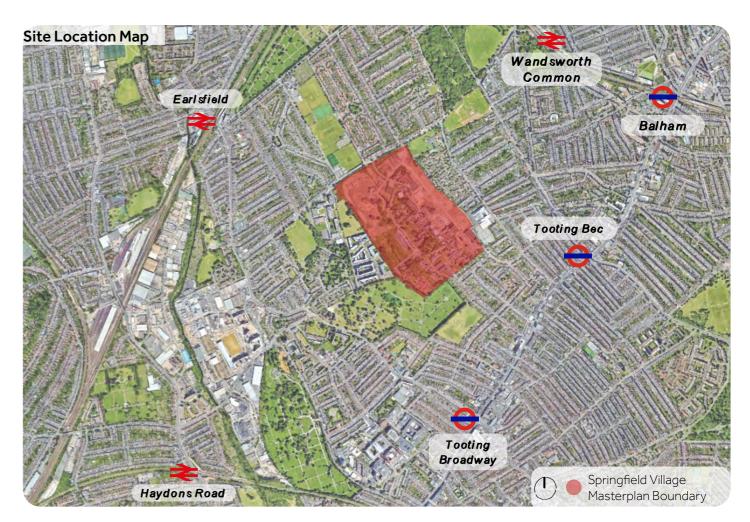
Through the delivery of subsequent reserved matters on the Masterplan Site, brought forward by a range of housebuilders, the approved 839 residential dwellings under the 2012 Permission have now been drawn down across the masterplan.

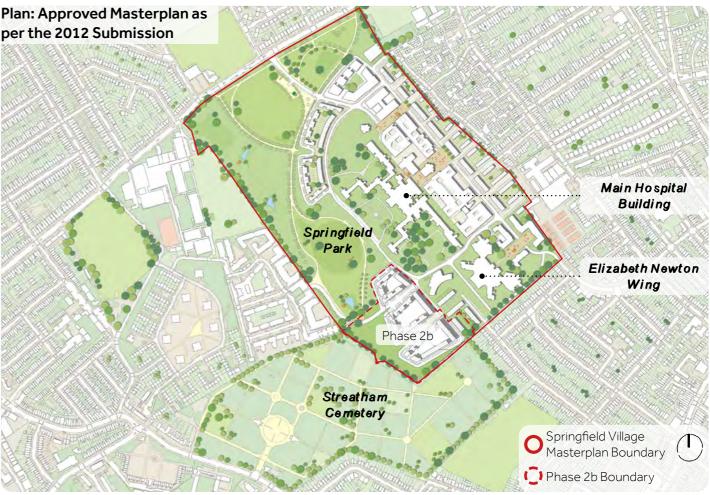


New Shaftesbury Building, Completed 2023



New Trinity Building & Trinity Sq, Completed 2023





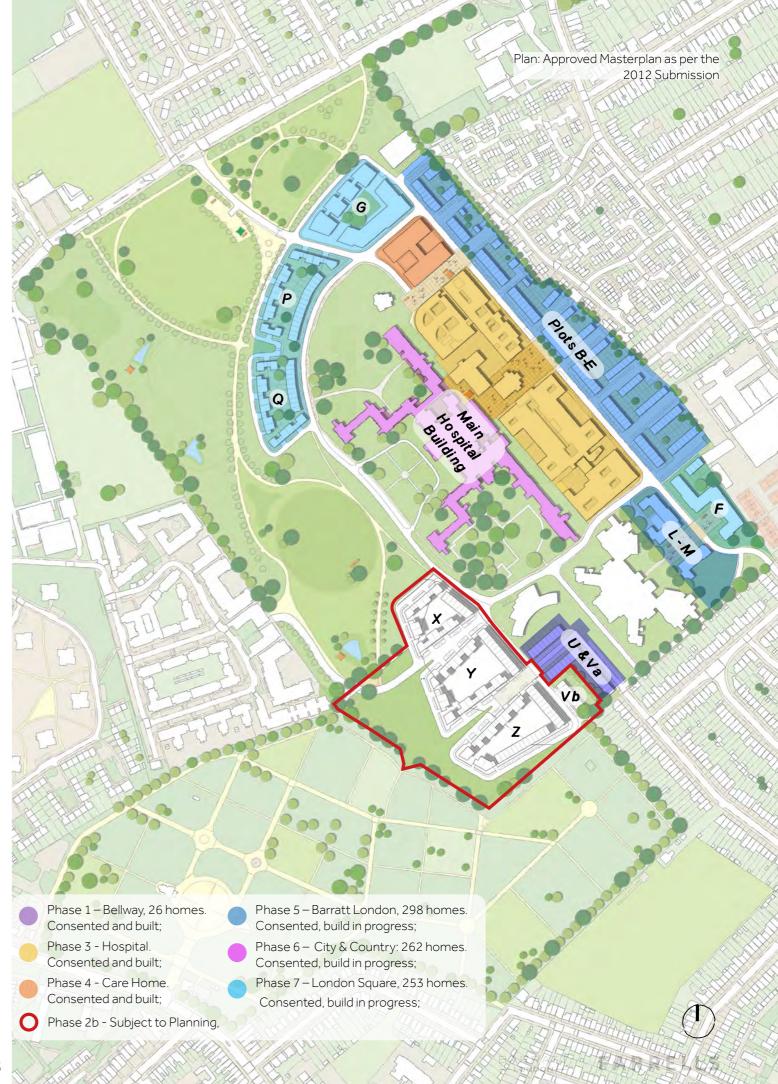
Site and Site Context

To date, the following parcels have been delivered or in the process of being delivered to date:

- Phase 1 26 dwellings (brought forward by Bellway completed);
- Phase 2 Park and Infrastructure (Implemented by STEP);
- Phase 3 Hospital (Implemented by STEP);
- Phase 4 Care Home (implemented STEP);
- Phase 5 298 dwellings (Implemented by Barratt);
- Phase 6a 72 conversion dwellings (Implemented by City and Country);
- Phase 6b Reserved Matters and Listed Building consent for 190 flats (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country);
- Phase 6c Full Application for the erection of 32 residential flats (falls outside the 839 approved and is pending determination); and
- Phase 6d Reserved Matters consent for the conversion of Glenburnie Lodge (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country).
- Phase 7 reserved matters for 253 dwellings (private and affordable) (Reserved Matters approved April 2023 and to be brought forward by London Square)

Plots X,Y,Z and Vb (Phase 2b) have been identified as surplus by the Trust and provides an opportunity to deliver further housing to that approved in 2012, which not only optimises the Site but generates funding to support the delivery of the Trust Estate Modernisation Programme. As set out within the Trust's Financial Business Case, the receipts realised through the disposal of Plots X,Y,Z and Vb will provide the necessary funding to deliver Tolworth Hospital in the Royal Borough of Kingston upon Thames which received planning permission in August 2023. Without the capital receipts from the disposal of this Site, there is a multi-million point affordability gap in the funding.





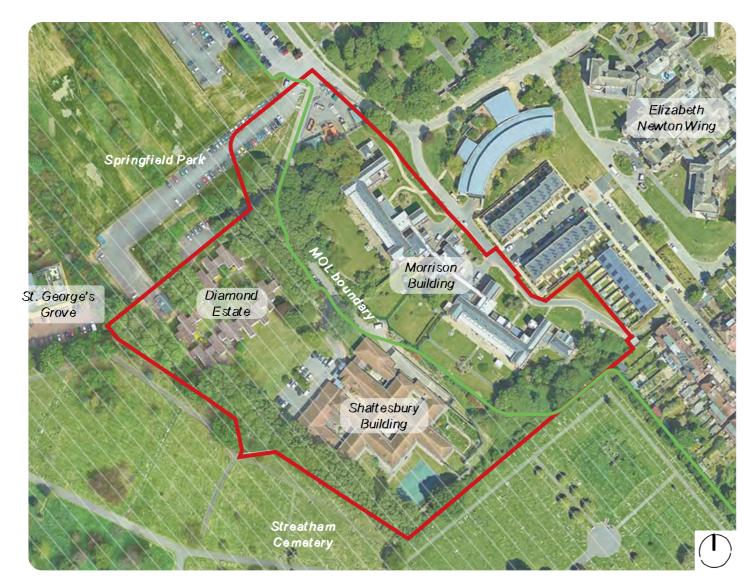
The Site

The Site subject to this Application measures approximately 3.46ha and is located within the south western part of the wider Masterplan Site. The Site has a sloping typology currently ranging from 24m to 16m AOD and in part falls within land designated as Metropolitan Open Land (MOL) and in part a Grade II Heritage Park and Garden.

The Site is currently occupied by the Shaftesbury Building and Diamond Estate which are vacant but previously provided hospital services and ancillary accommodation for nursing staff. The Morrison Building is located within the eastern part of the Site and comprises a two storey brick building, which is curtilage Grade II Listed and is currently utilised by the Trust to deliver hospital services however these services have been identified to be provided in due course in the new facilities at Tolworth Hospital.

The remainder of the Site comprises hard standing providing car parking, soft landscaping and existing mature tree belts both along the southern boundary of the Site and the west part of the Site.

Existing Site







Site pictures







Diamond Estate



Shaftesbury Building







Proposed Development

The Scheme proposes the demolition of all existing buildings on the Site and the comprehensive redevelopment of the Site to deliver 449 new residential homes for the London Borough of Wandsworth.

The delivery of these units will not only provide **a significant quantum of homes** for the Borough but also through the delivery of 50% affordable homes will deliver housing for all. The Scheme proposes the delivery of 220 affordable homes - a policy compliant level of affordable housing (50% on habitable rooms) with a split of 50% affordable rented homes (95 homes) and 50% intermediate homes (125 homes). The Scheme will deliver a mix of units, including larger family 3 bedroom units and 45 of the units will meet M4(3) requirements.

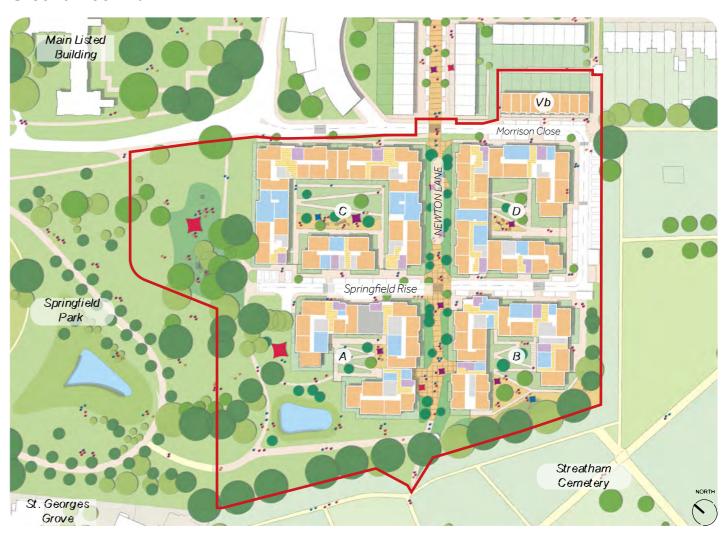
The Scheme will be brought forward within four accommodation blocks, with built form located adjacent to two centre spine roads, one running north to south and the other east to west. The remaining 9 town houses will be located to the north of the Site. Working with the existing landscape and site topography, the development will vary in heights between three and five storeys, with the massing stepping down towards the Cemetery. The removal of building form from the previous plot x has enabled a number of mature trees to be retained, the built form to be pulled away from the Grand II listed hospital building and be removed from the Grand II historic park and garden.

The design of the Scheme has evolved over many months of discussion with the LBW's design officer and their independent design review panel. The design of the proposals, including materiality and appearance, is deemed to meet the requisite high standards of design required under the London and Local Plan and complements the appearance of earlier phases nearby, ensuing a cohesive new neighbourhood.

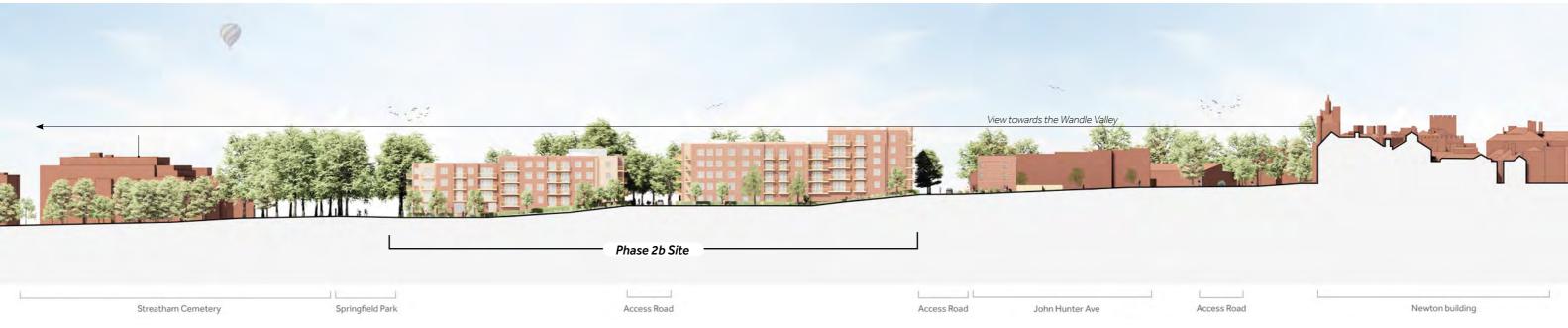
The Scheme proposes the delivery of 48 car parking spaces which aligns with the London Plan's sustainable travel agenda alongside a policy compliant level of cycle parking, contributions towards bus infrastructure improvements and new connectivity routes through the Site. A new central promenade through the Site proposed will deliver improved connectivity through the Site and a new link with Streatham Cemetery.

The Scheme seeks to deliver a play space provision and quantum of private amenity space which exceeds the Mayor's requirements.

Ground Floor Plan



Site section along the central pedestrian promenade



Proposed Development

Alongside a comprehensive landscape strategy throughout the Site, the Scheme will deliver the remaining 2.4 acres of the Springfield Park as approved under the 2012 Permission alongside an additional 0.3 acres of public park in light of the reorientation of the development plots.

There are a number of heritage assets within the wider Springfield Hospital Site, including the Grade II Listed Main Hospital Building and the Grade II Listed Elizabeth Newton Wing. The gardens of Springfield Hospital are also designated as a Grade II Registered Park and Garden. The GLA and LBW identified the scheme would result in less than substantial harm but this was outweighed by the public benefits the scheme would deliver.

Finally, the Scheme will enable the delivery of Tolworth Hospital. GLA Officers to date have recognised that the delivery of Tolworth Hospital will benefit South West London. Therefore, without the sale of the Site to deliver residential accommodation, the necessary funds to deliver Tolworth Hospital cannot be realised. Without the capital receipts from the disposal of this Site, there is an affordability gap in the funding. DHSC/NHSE London are not able to take the Full Business Case into the final approval system until planning is obtained.

As such, without such permission being granted on this Site, the redevelopment of Tolworth Hospital will not be delivered and fundamentally will prohibit the delivery of strategically important health infrastructure for London and will prohibit the delivery of significant healthcare benefits to patients through the delivery of new facilities.

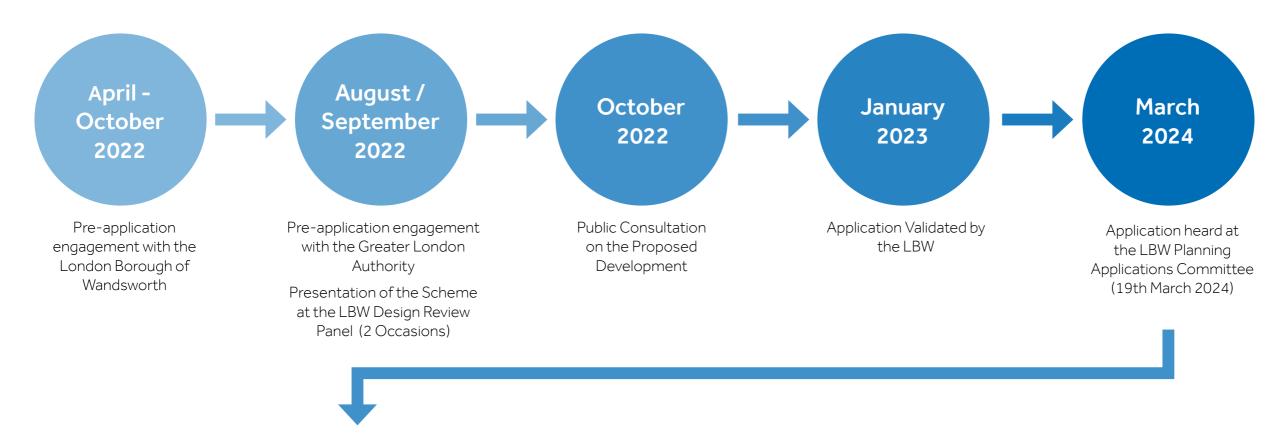
The Applicant prepared responses to the key technical comments raised in the Stage 1 Response by the GLA and submitted this to the LBW in July 2023.





Planning Process

Timeline of Engagement with the London Borough of Wandsworth:



Reasons for Refusal:

- 1. Reason 1: The proposed development, due to its scale, location and density constitutes inappropriate development in that part of the application site which is within Metropolitan Open Land. Whilst the application site is considered to be Previously Developed Land (as defined in Annex 2 of the NPPF 2023) the proposed new buildings do not fall within the permissible exceptions within paragraph 154(g) of the NPPF (2023) because they would have a greater impact on the openness of the Metropolitan Open Land than the existing development and they would cause substantial harm to the openness of the Metropolitan Open Land. The proposed development is therefore contrary to policy G3 of the London Plan (adopted 2021), policy LP53 of the Wandsworth Local Plan (adopted July 2023) and paragraph 154 of the NPPF (2023).
- 2. Reason 2: The proposed development, due to the number of residential units proposed and the application site's isolated location with poor public transport accessibility, would generate a large number of trips including from servicing and deliveries, placing unreasonable pressure on the constrained surrounding transport network and to the detriment of both existing residents in the locality and future residents of the proposed development, contrary to policies LP50 and LP51 of the Wandsworth Local Plan (adopted July 2023).
- 3. Reason 3: In the absence of a completed Section 106 planning obligation the proposal fails to mitigate the adverse impacts of the development and to meet the objectives of Policy LP62 of the Wandsworth Local Plan (adopted July 2023) and the Council's Planning Obligations SPD (dated October 2020).

Timeline of Engagement with the GLA:



Metropolitan Open Land

As set out above, part of the Site lies within Metropolitan Open Land (MOL), with this part of the Site occupied by existing built footprint and hardstanding in the form of the Shaftesbury and Diamond Estate. In line with the NPPF definition, the Site constitutes PDL, that is, land which is or was occupied by a permanent structure, including the curtilage of the development land and any associated fixed surface infrastructure. This also was the view of the Inspector on the 2012 Appeal Scheme. This position was also recognised by the GLA within their Stage 1 Report (Paragraph 18). There is therefore no disagreement that the Site constitutes PDL.

As part of the Application an assessment was undertaken which included a robust quantitative and qualitative assessment of proposals in line with NPPF Paragraph 154 (g). The approval of the reserved matters application for Phase 7 of the outline permission, which drew down the final residential units approved under the 2012 Permission prohibited the ability for plots X,Y,Z and Vb to come forward under the outline permission. In the light of this, the starting point for any MOL assessment is the existing baseline.

In comparison to the existing position on the Site, the Proposed Development results in an improvement to the layout of the existing built form within the MOL. This is achieved both through the reduction of the amount of built footprint in the MOL (as shown below in the table) alongside amendments to the layout of the built form in the MOL. The layout of the proposals is more compact and the landscape within the Scheme complements the adjoining MOL which forms part of the new public park. The proposed landscaping and block layout also produces more usable MOL which further again enhances its purpose.

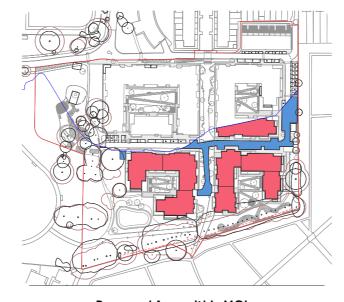
Whilst the proposals have a greater volume (three-dimensional form) than the existing buildings, the supporting submission documents demonstrates that the additional volume proposed has a very limited effect on the perception of openness from the MOL. The following 7 pages provide the basis of the visual impact assessment that informed our position that there is no material impact on openness arising from the Proposed Development.

Calculation of built area within MOL



Туре	Area
Building Footprint	4,254 m ²
Roads & Hard-standing	5,145 m ²
Total	9,399 m²

Existing Area within MOL



Proposed Area within MOL	
Туре	Area
Building Footprint	$4,137 m^2$
Roads & Hard-standing	1,228 m ²
Total	5,365 m²

The application demonstrated that the proposals are appropriate development in the MOL, falling within the scope of the Green Belt exceptions test at NPPF 154 (g). Officers of the Council obtained a legal opinion confirming this analysis was correct.

The Committee Report by the LBW further stated that: "On balance, after consideration of all relevant factors, it is concluded that the proposed development site constitutes previous developed land. Further when assessed against NPPF Paragraph 154(g) the development would not cause substantial harm to the openness of the MOL and would contribute towards meeting an identified housing need within the borough. It is therefore concluded the proposals would be in an appropriate degree of accordance with policy G3 of the London Plan, local plan policy LP53 and the objectives of chapter 13 of the NPPF (2023)."

Notwithstanding our position, also as a fallback, the Application identified the very special circumstances which would justify the development if a different conclusion was formed, and the proposals deemed inappropriate development. This included:

- The delivery of residential accommodation including new affordable homes;
- The delivery of Tolworth Hospital,
- Improved relationship with Heritage Assets on the Site;
- Improved connectivity through the Site;
- Creation of new viewing points within the Site;
- The delivery of new Biodiversity Net Gain; and
- Increase in publically accessible open space alongside an exceedance in play provision.

Proposed Masterplan showing views from within MOL towards the Main Listed Building



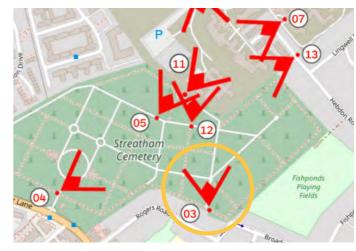
Visual Impact

View 03, from the south side of Streatham Cemetery

Existing







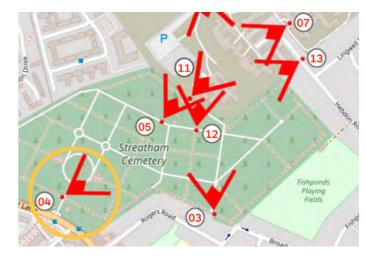
Visual Impact

View 04, from the south-west side of Streatham Cemetery

Existing







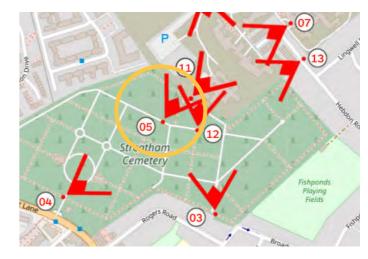
Visual Impact

View 05, from within Streatham Cemetery

Existing







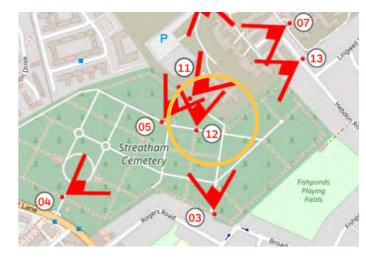
Visual Impact

View 12, from within Streatham Cemetery

Existing







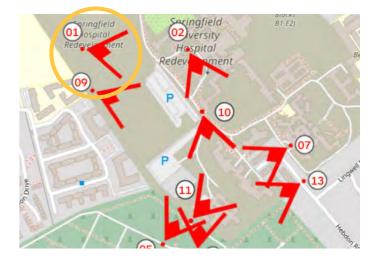
Visual Impact

View 01, from within Springfield Park

Existing







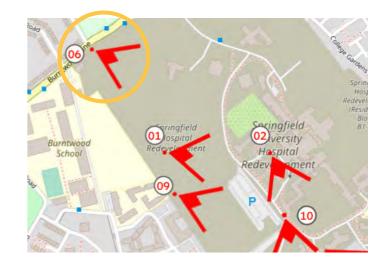
Visual Impact

View 06, from Springfield Park at the entrance from Burntwood Lane

Existing







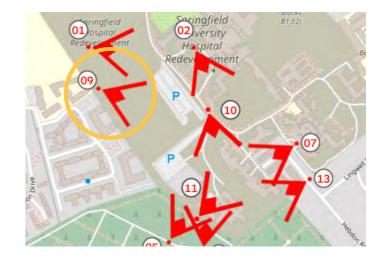
Visual Impact

View 09, from Springfield Park at the boundary with St. George's Grove

Existing







Planning Benefits

As set out within the Submission, the Scheme will deliver significant benefits:

- 449 new homes and a significant contribution to Wandsworth's housing targets with a blend of different size homes, market homes and affordable tenures.
- 50% of the new homes will be affordable (by habitable room) and fully compliant with Wandsworth Council's policy, with 95 social rent flats and 125 intermediate flats.
- Providing social rent affordable homes rather than other forms of affordable rent tenures considered by the Mayor of London as 'genuinely affordable' to directly help those on the Council's housing list.
- Significant planning contributions to support and improve local services including education, health and transport, secured through a Section 106 Agreement, and £7.7 million in CIL contributions.
- Reconfiguration of this part of Springfield Park to create more usable open space and an additional 0.3 acres of publicly accessible new park.
- Reduction in parking spaces (117 reduced to 48 spaces) which will significantly reduce private vehicle movements. All parking spaces will be delivered as active charging spaces for electric vehicles.
- Removal of the previously proposed vehicle route through John Hunter Avenue, a significant benefit to these residents and those in Hebdon Road and Lingwell Road.
- Promotion of a pedestrian and cycle led development to reduce reliance on private vehicle travel, with 817 cycle parking spaces.
- Creation of new play spaces for children of all ages.
- Retention of established trees and habitats within the setting of the historic building.
- Creation of a new pedestrian and cycle access into Streatham Cemetery and a new green route to Tooting Broadway.
- Supporting around 300 jobs/training opportunities during construction and 20 jobs once the development is complete.
- Opportunity for more affordable homes to come forward on land at Springfield which has historically been earmarked for a primary school, as part of the Council's 1,000 Home Programme.
- Enabling the delivery of Tolworth Hospital and completion of the Trust's Estate Modernisation Programme. Whilst this sits in Kingston, the Trust is responsible for the mental health and wellbeing of the 1.2 million people across five South West London boroughs, including in-patient and community services



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London

9 Hatton Street London NW8 8PL

Tel: +44 (0)20 7258 3433 enquiries@farrells.com

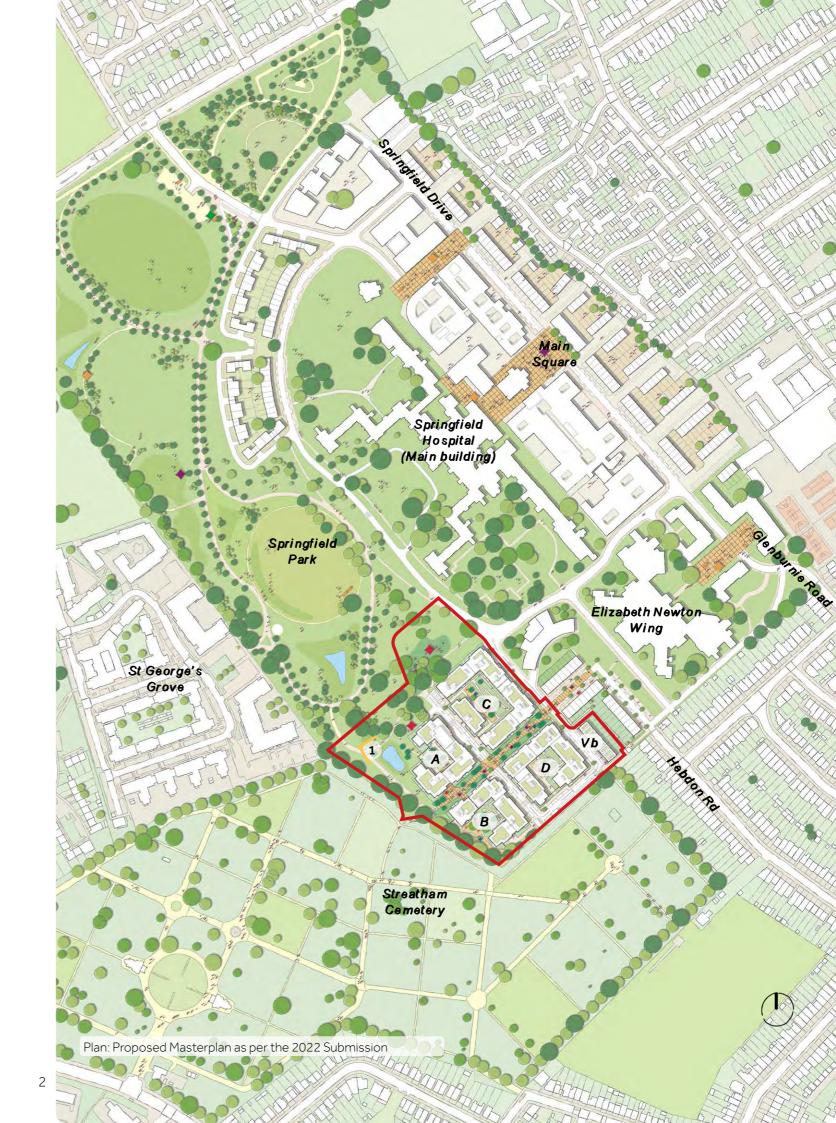


Introduction

This document has been prepared to illustrate key features of the proposal in response to queries raised by GLA Officers during the first pre-application meeting held on the 10th of July.

The following pages include:

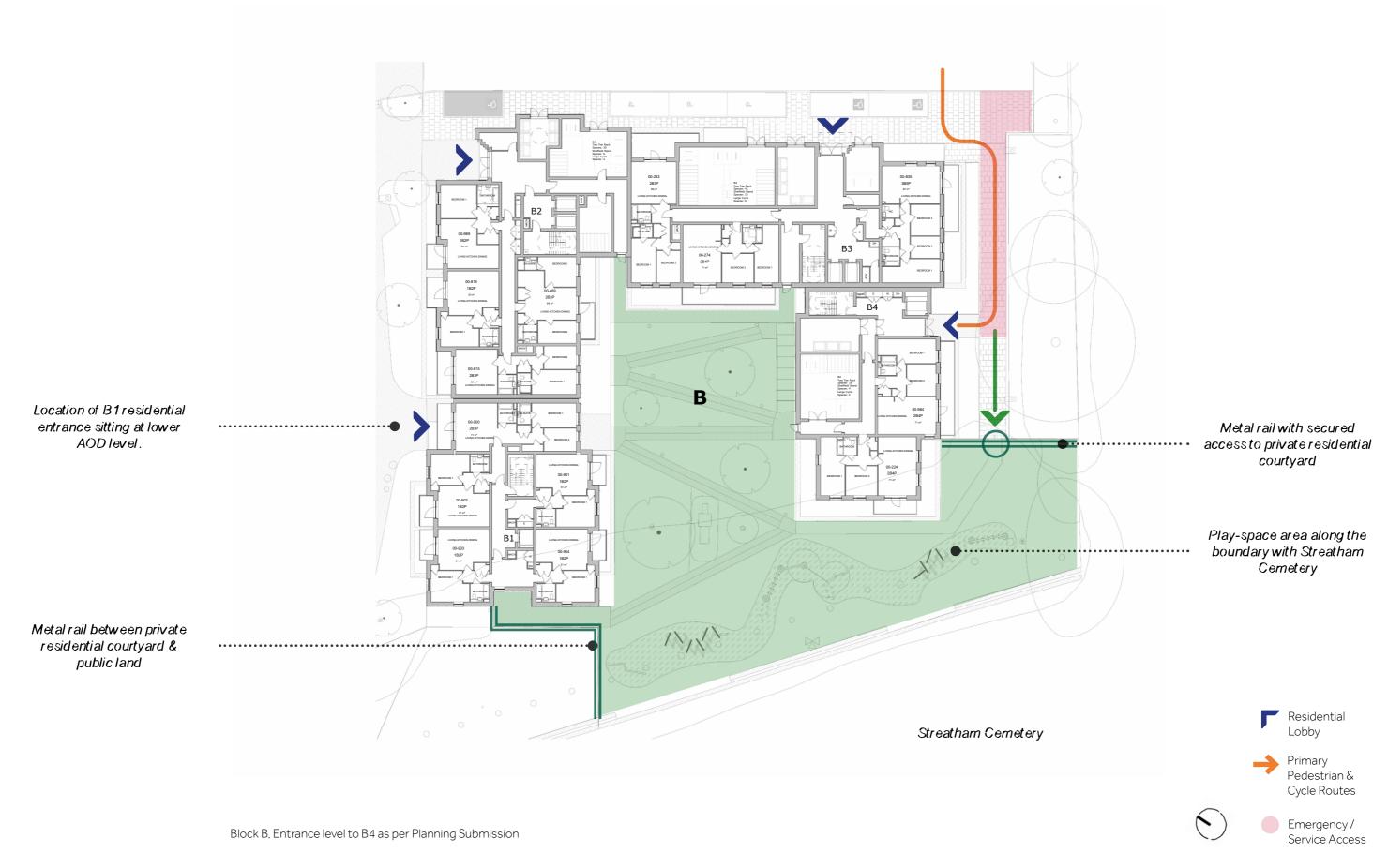
- Site-wide plan illustrating pedestrian routes, residential entrances and location of private amenity spaces.
- Block B plan showing residential entrances, access to private residential amenity courtyard, and play-space strategy.
- Illustrative image of the B4 entrance way including landscaping to be provided to the GLA.
- Location and representation of ground floor terraces and balconies
- Additional tree planting along Lapidge Way



Site Private Spaces, Pedestrian Routes & Boundary Conditions



Block B - Entrance & Public Realm Clarification

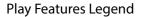


Block B - Landscape & Playspace Strategy



Trim Trail within play bark

Informal climbing steps



- Climbing structure with slide
- Fixed, secure log scramble
- Zig zag stepper within play bark
- Spinner bowl



and manage risk



Play value: balance, play that provide challenges



Play value: balance, play that provide challenges



Play value: balance, spin



Overall Play Value in Courtyard Block B

- Balance
- Climb

- Play that provide challenges
- Play that encourages children to assess and manage risk

Block B4 - Illustrative Views



Ground Floor Private Amenity Strategy

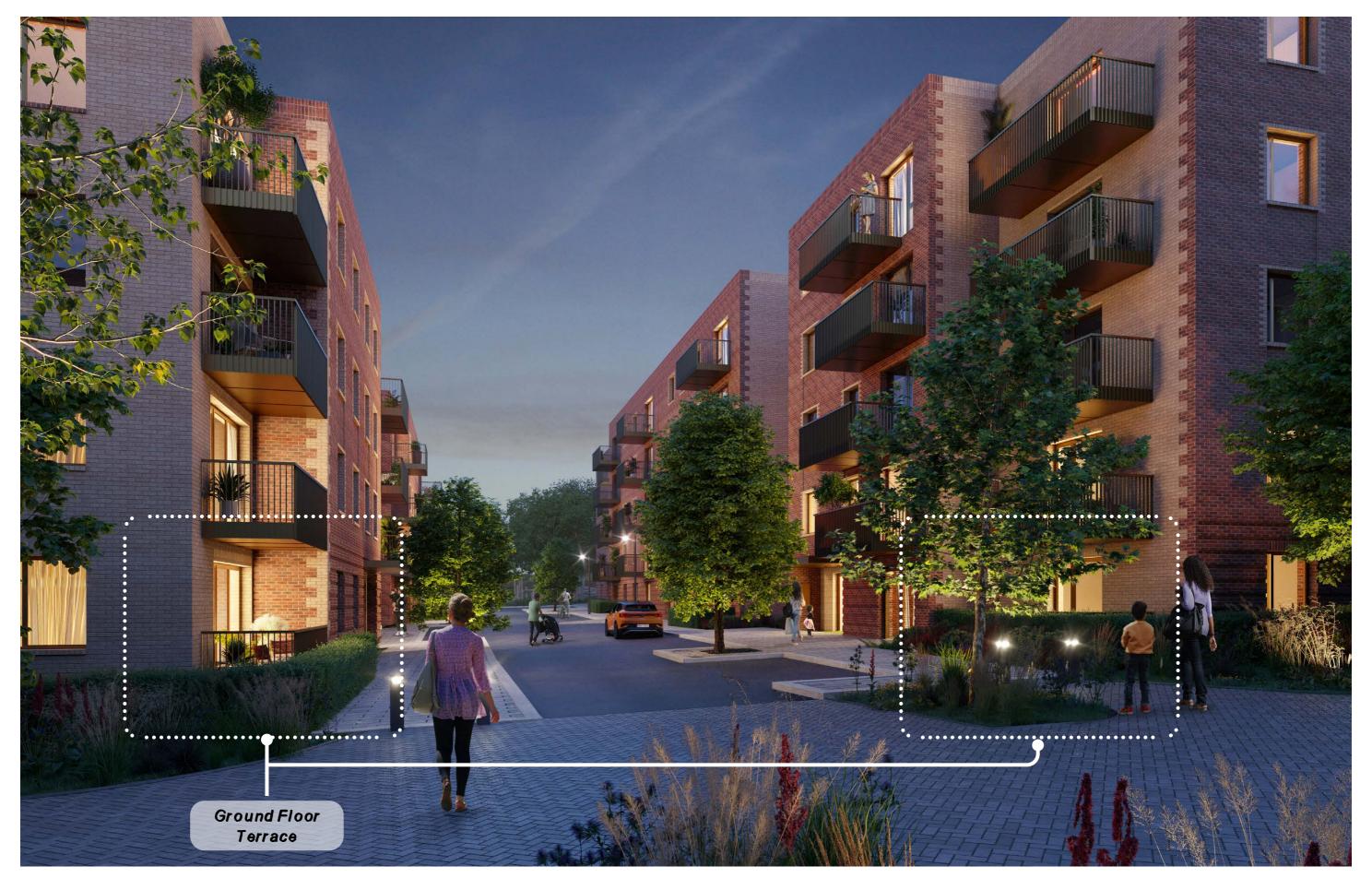
Combination of private balconies, terraces & gardens



Ground Floor Private Amenity Strategy - Ground Floor Balcony



Ground Floor Private Amenity Strategy - Ground Floor Terrace



Additional Trees along Lapidge Way

This diagram illustrates the locations for further tree planting to the site.

The three new trees have been introduced to soften the transition to the adjacent road and screen the development from the north west. The new tree planting also creates an informal avenue along the path that connects the development to the adjacent parkland. The tree species will align with the species proposed across the development.

The parkland adjoining the site will be heavily planted with new trees, these are not shown rendered on the original plan so tree positions have been added to the diagram for clarity.











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London

9 Hatton Street London NW8 8PL

Tel: +44 (0)20 7258 3433 enquiries@farrells.com

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Conservation Comments 1

GLA case reference number: 2024/0285/S3

Phase 2b Springfield Hospital

London Borough of Wandsworth

LPA planning reference: 2022/5288

Case Officer:

Conservation Officer:

Site Address: Springfield Hospital, 61 Glenburnie Road, London SW17

7DJ

Application Stage: Stage 3

Comments Date: 22nd August 2024

Proposal Description

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).

Legislation, policy and guidance

- Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision maker to "have special regard to the desirability of preserving the [listed] building or its setting or any features of special architectural or historic interest which it possesses".
- 2. Section 72 (1) of the same Act states that "In the exercise, with respect to any buildings or other land in a conservation area, of any powers [to grant Planning Permission] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

- 3. National Planning Policy Framework, Chapter 16 Conserving and enhancing the historic environment particularly Paragraphs 195, 200, 201, 204, 205, 206, 208, 209, 210 and 211 is relevant. The NPPF makes clear that when considering the impact of a scheme, any conflict with a heritage asset's conservation should be avoided or minimised (Para 201). Para 205 and caselaw indicate that great weight should be given to a heritage asset's conservation. Harm should be clearly and convincingly justified and, if less than substantial, weighed against any public benefits (Paras 206 and 208).
- 4. Also relevant are the national Planning Practice Guidance; Historic England: Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2 (Second Edition July 2015); Historic England: Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017).
- 5. London Plan Policy HC1 Heritage conservation and growth requires development proposals to conserve significance by being sympathetic to the assets' significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6. London Plan Policy D3 Optimising site capacity through the design-led approach requires development proposals to respond to respond to the existing character of a place and respect, enhance and utilise the heritage assets that contribute towards local character.
- 7. London Plan Policy D9 C 1) b) requires development proposals for tall buildings to take account of and avoid harm to London's heritage assets and their settings and requires clear and convincing justification for any harm, and demonstration that alternatives have been explored and that clear public benefits outweigh that harm.
- 8. London Plan Policy HC3 Strategic and Local Views Part G requires LPAs to identify Local Views.
- 9. In January 2024 the GLA published a Practice Note on *Heritage Impact Assessments and the setting of heritage assets.*
- 10. The following Wandsworth Local Plan (2023-2038) policies are relevant: Environmental Objective 4 and Policy LP1 (The Design-Led Approach), Policy LP3 (Historic Environment), Policy LP4 (Tall and Mid-Rise Buildings), OUT3 Springfield Hospital, Burntwood Lane/Glenburnie Road, SW17. Also relevant is the *Wandsworth Historic Environment SPD* (LBW, 2016).

Application documents and process

- 11. GLA officers have carefully reviewed all the submitted information including but not limited to:
 - Design and Access Statement (December 2022):
 - Design and Access Statement Addendum (July 2023);
 - Design and Access Statement Addendum (February 2024);

- Planning Statement (December 2022);
- Environmental Impact Assessment Volume 2: Built Heritage, Townscape and Visual Impact Assessment (December 2022);
- Heritage, Townscape and Visual Impact Addendum: Response to GLA Clarifications (16th August 2024);
- Archaeological Desk-Based Assessment Parts 1 and 2 (December 2022);
- Arboricultural Impact Assessment (December 2022);
- Arboricultural Impact Assessment (April 2023);
- Landscaping drawings;
- Wandsworth Design Review Panel Reports (September, October 2022);
- A digital 3D computer model of the proposed development in context, accessed using VuCity;
- GLA pre-application, Stage 1 and Stage 2 reports;
- Comments from statutory and other consultees;
- Officers' Report to the Planning Committee of London Borough of Wandsworth; and
- Draft conditions and Section 106 Agreement.
- 12. A detailed site visit took place on 10th June 2024 with a photographic record taken.
- 13. Overall, the application documents and information provided are adequate for the purposes of this assessment.

Methodology and scope of assessment

Methodology for the assessment of significance

- 14. This assessment uses the NPPF Glossary definition and the PPG analysis of significance and the approach to assessing direct impacts advocated in Historic England's Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2 (Second Edition July 2015). The NPPF Glossary definition of significance is "The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting". This is interpreted in PPG¹:
 - "archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design,

¹ Paragraph: 006 Reference ID: 18a-006-20190723.

- construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them.
 Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity."

Methodology for the assessment of impacts on settings

- 15. The NPPF defines setting as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 16. This assessment uses the methodology and approach advocated in Historic England's *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Second Edition, 2017) since this is best practice. This proposes a five-step approach.
 - Step 1: Identify which heritage assets and their settings are affected;
 - Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm;
 - Step 5: Make and document the decision and monitor outcomes.

Scoping

17. The following heritage assets have been scoped out of the assessment for the reasons given: the Church of St Mary (Summers Town), listed Grade II, the Lodge to St Clements Danes Almshouses, listed Grade II and Wandsworth Common Conservation Area. There are no known historical links between these assets and the site. The information provided has demonstrated that there is no intervisibility between the assets and the site or, where there is some intervisibility, this is tangential and distant, with no likely impact on the visual setting of the assets.

Conformity with GLA requirements

18. In January 2024 the GLA published a Practice Note on *Heritage Impact Assessments and the setting of heritage assets*. The GLA now assesses all Stage 3 cases for conformity with the key principles of this note. It is acknowledged that this case is a transitional one, since the scheme passed

- through pre-application discussions and Stage 1 prior to the publication of the note and was only called in on 20th May 2024, shortly after the note's publication.
- 19. The following commentary assesses the conformity with the key principles of the note:
 - The provision of a separate Heritage Impact Assessment, distinct from any Environmental Impact Assessment, with the identities, qualifications and experience of the authors clarified. The relevant document is the *Environmental Impact Assessment Volume 2: Built Heritage, Townscape and Visual Impact Assessment* (December 2022). The requirement for a separate document is not met. However, the Historic Environment Assessment is a clearly defined chapter and does not conflate heritage and townscape assessment and the *Heritage, Townscape and Visual Impact Addendum: Response to GLA Clarifications* (16th August 2024) meets the requirements. The authors are identified and are appropriately qualified and experienced.
 - The use of ZTVs to establish the extent of intervisibility between the
 proposed development and heritage assets as a basis for the scoping of
 assets, the selection of viewpoints and the provision of AVRs. The ZTVs
 are provided and can be seen as the basis for scoping and view shedding.
 This requirement is met.
 - The use of Historic England's *Good Practice Advice in Planning Note 3:*The Setting of Heritage Assets (Second Edition, 2017) as the methodology for the assessment of impacts on the setting of heritage assets. This requirement is met.
 - The provision of clear assessments of harm (if any) using the language of the NPPF. This requirement is met.
 - AVRs were provided in the Environmental Impact Assessment Volume 2: Built Heritage, Townscape and Visual Impact Assessment (December 2022). The technical requirements around the production of AVRs were not met since some views were out of date and others were summer images with trees in full leaf. This has been addressed in Heritage, Townscape and Visual Impact Addendum: Response to GLA Clarifications (16th August 2024). This been addressed. Views 1, 6, 9 and 10 have been updated. A digital 3D computer model of the proposed development in context, accessed using VuCity and this allows Views 11, 12 and 13 to be modelled with trees out of leaf. This requirement is now met.

Archaeology

20. The submitted Archaeological Desk-Based Assessment concludes (Paras 5.7 to 5.11): "Development on the study site will not impact on any designated archaeological assets. The site is not located within an Archaeological Priority Area, as defined by the London Borough of Wandsworth. Based on current

evidence, this assessment has identified a low archaeological potential for all past periods of human activity. Past post-depositional activity, particularly associated with the development of Springfield Hospital, can be considered to have had a substantial negative impact on any archaeological remains on the study site. Therefore, in view of the study site's limited theoretical archaeological potential, combined with past post-depositional impacts, development within the site is considered unlikely to have a negative archaeological impact. It is considered that the proposed cemetery boundary works are also unlikely to have an archaeological impact."

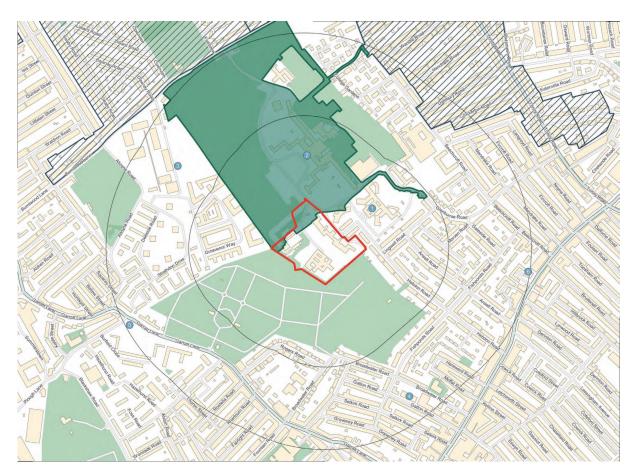
- 21. Historic England's Greater London Archaeological Advisory Service responded to consultation on 23rd January 2023, stating "Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or are available in connection with this application, it is concluded that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary."
- 22. GLA officers consider that no harm to potential archaeological assets is foreseeable. No archaeological planning conditions are therefore needed.

Relevant heritage designations

- 23. The site is not located within a conservation area.
- 24. Part of the red line boundary of the site is within the Springfield Hospital Registered Park and Garden, Grade II.
- 25. There are no other designated or non-designated heritage assets within the red line boundary.
- 26. The site is in the setting of the heritage assets discussed below.

Heritage assessment

- 27. The site formed part of the masterplan Outline Planning Permission 2010/30703 (with associated Listed Building Consent 2010/3706) granted at appeal in 2012. This scheme has been largely implemented and is therefore a material consideration in the assessment of this application.
- 28. The site is located to the southeast of the main listed hospital buildings. The site is in two zones, separated by a belt of trees. The larger part to the southeast contains the Morrison Building, Diamond Estate and Shaftesbury Building. Map regression shows that this area was historically (until about 1894) a pair of agricultural fields. This land did not form part of the curtilage of Springfield Hospital and for this reason was not included in the Registered Park and Garden boundary. The belt of trees is likely to have been planted as a visual and possibly wind barrier to separate the hospital parkland setting from the formerly agricultural land. In the later 19th and 20th century, the hospital began to expand to the southeast, with the construction of the listed Elizabeth Newton Wing (circa 1897), Morrison Building (circa 1931) and later the Diamond Estate (circa 1986) and Shaftesbury Building (1992).



The image shows the RPG in dark green and the site with the red line boundary.

- 29. The belt of trees and a small area of land to the northwest of the belt of trees formed part of the hospital parkland and are included within the Registered Park and Garden. At the time of the site visit building works were in progress in this area. Recent aerial imagery shows that it was hardstanding and surface car parking associated with the car park to the golf course formerly on the wider site. As can be seen above, a very small area of the site to the extreme southwest is also inside the RPG. This forms the tip of the belt of trees.
- 30. The proposed development includes four main blocks. The block closest to the RPG and the listed Main Building is Block C, which is five storeys (39.63m AOD) in height. This compares with the listed building at 38.32m AOD. Blocks C, D and E are the closest to the listed Elizabeth Newton Wing. Blocks A, B and D are adjacent to Streatham Cemetery. All four blocks have been arranged to create a new vista from the cemetery, through the development and up John Hunter Avenue, towards the axial main entrance and tower of the Elizabeth Newton Wing. All four blocks are located to the southwest of the belt of trees which separates the proposed development from the RPG itself.
- 31. The terrain slopes from northeast to southwest: Blocks C and D are on the higher ground and Blocks A and B are on the lower ground, the boundary with the cemetery being the lowest point on the site. The proposed heights are distributed unusually, with the taller elements at the top of the slope and the

lower elements at the bottom of the slope. This arrangement has other benefits in terms of urban design and sustainability (reducing the need for earth moving and a podium), which are supported elsewhere in this report. It has the effect of reducing heights and visual impact on the cemetery. Conversely, it also has the effect of increasing heights and potential visual impacts to the settings of the listed main hospital, the Elizabeth Newton Wing and the Registered Park and Garden.

Springfield Hospital Registered Park and Garden (RPG), Grade II
Significance

- 32. The hospital parkland was created in 1841-2 as a setting and curtilage for the Surrey County Lunatic Asylum (now the listed Springfield Hospital (Main Building), see below). The asylum was built on agricultural land forming part of Springfield Farm (of which only the icehouse now survives, see below). The choice of site was deliberate and conscious: at this time this area was open downland country. The site allowed the privacy, physical remoteness and seclusion which were key to the asylum concept; the location of the grand asylum on a southwest facing ridge allowed extensive views of open countryside as well as providing a dignified setting in the manner of a country house, adding to the prestige of the institution.
- 33. The mentally ill were generally treated very badly in the period up to and including the 18th century: Hogarth's famous engraving of paid visitors viewing the mentally ill in Bedlam (*The Rake's Progress*) illustrates both the stigma and cruelty of contemporary attitudes, which located patients as entertainment in a human zoo. Such attitudes began to change with the pioneering work of Dr Edward Francis Tuke (c1776-c1846) and others, who advocated more humane approaches, with a particular emphasis on sunlight, fresh air, exercise and meaningful work as therapies.
- 34. This thinking is directly reflected in the design of the hospital parkland which included six airing courts linked to the male and female wards of the hospital. These were originally secured by an unusually large ha-ha, these spaces allowed patients space to exercise, play games and enjoy fresh air, but not to leave. The courts included trees for shade, some covered elements against the weather and toilet facilities; it was clearly intended that large parts of the day would be spent outdoors. Other areas were cleared and levelled for games, such as the creation of a bowling green, and elsewhere the laying out of cricket pitches and tennis courts. The parkland also included a kitchen garden (with glasshouse and frame yard) and Springfield Farm; the cultivation of vegetables and the keeping of animals formed part of occupational therapy. Enclosure of the estate and hospital grounds was important to keep the public out, and the patients in. A fence made of oak was constructed around the grounds providing a solid form of enclosure to the estate with further spaces enclosed by brick walls around the kitchen garden. The enclosure of the estate included the

- planting of mature tree belts around the RPG, which form a distinct perimeter to the hospital. The parkland also featured country house features such as entrance lodges, drives and a carriage turn route.
- 35. The RPG has archaeological value since its surviving elements form direct evidence of these past attitudes and practices. It has artistic value as a designed landscape of some beauty which sets off the hospital, particularly in the more intact front lawn setting of the building with the Cedars of Lebanon. The RPG has historic value because its surviving design form and features illustrate the history of reform in the treatment of the mentally ill. There is a small element of communal value since the hospital parkland has been used by generations of staff and patients, as well as public golf course users.

Contribution made by setting to significance

- 36. The setting of the RPG has changed over time. Originally the land around was open farmland. With the exception of Streatham Cemetery to the south, this has generally been built suburbanised by the sprawl of London. Parts of the parkland (particularly to the north of the main building) have been developed and the parkland is smaller than it once was, with Springfield Farm replaced with a school and other development.
- 37. The site contributes positively to the setting of the RPG, since the belt of trees, as noted above, forms a clear boundary. This belt may be a hedgerow which has grown out, or a hedgerow which has been supplemented with planting, or may be a designed, planted feature. The trees in it may date to 1842 or maybe succession planting or self-seeded, but it remains a feature of historic interest. The existing buildings on site, particularly the Diamond Estate and the Shaftesbury Building sit low in the landscape and are effectively screened in most views from the RPG, and this contributes positively to the setting of the RPG by providing a non-obtrusive apparently semi-rural setting in some views.

Heritage impacts and benefits

- 38. There is no built development proposed on the small area of the RPG which falls within the red line boundary.
- 39. The small area of land to the northwest of the belt of trees is proposed to be laid to grassland and this is an enhancement to the RPG over the current situation where it is mainly hardstanding and car parking. This is a heritage benefit.
- 40. The belt of trees forms part of TPO182 (23 trees/tree groups) and these are largely proposed to be retained and this is welcomed in conservation terms. It is proposed to include a public play area ("Play in the woods") under the trees, with some associated pathways and this an appropriate element in the RPG, subject to an arboricultural condition to manage works within the Root Protection Zone.
- 41. The 2012 scheme included a block of housing (Block X) located within the part of the site which is also within the Registered Park and Garden. This was

- harmful to the significance of the RPG since it would result in the loss of the historic belt of mature trees and urbanisation of this area of previously open and historic designed landscape. In conservation terms the removal of Block X and the consequent retention of the tree belt is a welcome and important enhancement to the scheme.
- 42. As shown in BHTVIA Views 1, 2, 3, 5, 6, 7, 9, 10, 11 and 12 and TVIA Addendum Views 1, 6, 9 and 10, this Block C will rise above the treeline of the belt of trees even in the summer months. This causes harm to the contribution made by setting to the significance of the RPG since it introduces an urbanising and uncharacteristic element into the setting, distracting from the historic parkland quality of the RPG. The harm is considered to be less than substantial at a low extent.

Other buildings on site

- 43. The Diamond Estate, a group of 21 staff residential buildings, was built around 1986, 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. In views from the cemetery, the Diamond Estate screens visibility of the Springfield Hospital complex, therefore creating a physical, built barrier between the Registered Park and Garden, the Cemetery and the Hospital. These buildings have no heritage significance.
- 44. The Shaftesbury Clinic was built in 1992. 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 does not have heritage significance.
- 45. The Morrison Building is a two-storey building accessed along Jupiter Way, to the immediate south of the listed part of Springfield Hospital and to the south west of the listed Elizabeth Newton Wing. 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 around 1931 as an infirmary block to treat mentally ill patients who were also physically ill. The Morrison Building is separated from the Springfield Hospital buildings by dense foliage associated with airing gardens, which form part of the Springfield Hospital RPG. 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 2012 Appeal Decision clarified that the building is curtilage listed, since it forms part of the listed hospital and pre-dates 1948, although that decision also gave Listed Building Consent for its demolition.
- 46. The demolition of these three buildings has been previously consented as part of the 2012 Appeal Decision for the Outline Masterplan. The Diamond Estate and the Shaftesbury Clinic are or no significance. The significance of the Morrison Building need not be considered since its demolition has been

consented and this consent has been partially implemented. **No harm is** therefore caused.

Springfield Hospital (Main Building), listed Grade II

Significance

- 47. The Main Building was constructed between c1838-41 as the Surrey Country Lunatic Asylum, with extensions in 1874 and the later 19th century. The building was designed by Edward Lapidge (1779-1860) who was known as being the county surveyor of Surrey and having designed Kingston Bridge. His other work included major country house schemes at Esher Place and major alterations to Norbiton Place. Other projects included colleges for King's College, University of Cambridge, churches at Hampton Wick, Ham and Hammersmith. It was constructed as a purpose-built mental health asylum and is a grand symmetrical Tudor-style composition enclosing a large courtyard. As noted above, its location on the south facing ridge is dramatic and the overall effect of the southwest elevation with the Cedar of Lebanon trees is striking.
- The building has archaeological interest since its surviving element provide 48. direct evidence of the past treatment of the mentally ill. The building has architectural value since it is a major work by a talented and well-regarded architect of the period. The building has some of the design elements of a country mansion and there is an element of the "telegraph pole" planning reflective of the desire for fresh air and ventilation spaces between buildings, later associated with the ideas of Florence Nightingale. The building has artistic value in the use of high-quality craft skills in its construction, materials and details and in the successful use of a Tudor Revival style on the grand scale, with echoes of Hampton Court Palace. The building has historic value as one of the earlier examples of the more humane early-Victorian approach to treating mental illness, and its design and form reflects these aims. This is enhanced by the intimate and designed relationship with the RPG setting, which also reflects the same therapeutic approach, as noted above. The building has group value with the RPG and the nearby and historically linked Elizabeth Newton Wing. There is an element of communal value, since it is essentially a public building, with strong associations for many former staff, patients and others.
- 49. The hospital chapel to the north was built after 1869 and before 1894 and falls within the curtilage of the listed building and therefore forms part of the Grade II listed Springfield Hospital (Main Building). This building is further discussed below as a locally listed building, but it is, in fact and law, Grade II listed.

Contribution made by setting to significance

50. The setting of the hospital is mainly the RPG discussed above. This setting contributes highly to significance since is historically linked to the building, its history, function and significance. The setting also allows the significance of the hospital to be appreciated, particularly in views from the southwest. The site of

proposed development contributes to significance since the belt of trees forms part of the historic boundary layout and serves to shield the existing buildings behind from view.

Heritage impacts and benefits

51. Block C is five storeys (39.63m AOD) in height. This block is located at relatively close to the southeast corner of the listed building and is taller than the listed building (which is 38.32m AOD). As shown in BHTVIA Views 1, 2, 6, 9, 10 and 11 and TVIA Addendum Views 1, 6, 9 and 10, this block will rise above the treeline of the belt of trees even in summer months. Block C will slightly challenge the scale of the listed building and will intrude into the view of this part of the listed building, distracting from the primacy of the listed building in the view (shown for example in View 10). This causes harm to the contribution made by setting to the significance of the listed building, although it is acknowledged that this is not the main axial view of the principal elevation.

The harm is considered to be less than substantial at a low extent.

Elizabeth Newton Wing, listed Grade II

Significance

- 52. The Elizabeth Newton Wing was constructed in 1895 and provided separate facilities for the treatment of children with mental disabilities rather than mental illness and is an unusual building to find on a Victorian asylum site. Horribly, this was originally known as the Annexe for Idiot Children. The building has its national origins in the Lunacy Act which reflected changes to attitudes in the later 19th century and the pioneering work of Hugh Gardner-Hill, the hospital superintendent at the time. Both sought to separate children from adults in mental hospitals and started to distinguish between mental illness and cognitive impairment. It is stated to be unique as an example of provision for disabled children in a Victorian mental asylum.
- 53. The building was designed by Rowland Plumbe (1838-1919), who was renowned for residential buildings and the production of early masterplans for towns. He had a significant role in the creation of the Artisans, Labourers and General Dwellings Company who focused on building houses for the working classes in open countryside along railway lines with links to significant urban centres. He designed across typologies and styles, constructing churches that are now Grade II listed at Loxwood in West Sussex and St Margret at Streatham Hill. He worked on numerous other hospitals and buildings for healthcare including the London Hospital, Poplar Hospital, Napsbury Hospital and London Colney.
- 54. The Elizabeth Newton wing is faced in red brick with stone dressings under a slate roof with tall, brick chimney stacks. The central roof on the front (southwest facing) range is gabled with a cupola. It is in the Tudor Revival style

- to match the Main Building, albeit on a more domestic scale as befitting its original uses for children's services.
- 55. The building has an extraordinary ground plan, described by Historic England as a "small echelon-type plan" with 4 ward wings, these featuring "diagonally-set echelon pavilions with battlemented stair tower on the inner angles and similar but wider day-room towers with canted bay windows at the distal ends." This was presumably associated with a need for light and air. The interior has a central dining hall with arch-braced timber roof and central clerestory.
- 56. The building has archaeological value since surviving elements directly evidence late Victorian approaches to the care of disabled children. The building has architectural and artistic value since it is an excellent building by an accomplished architect of the time, with an impressive entrance sequence, unusual form and the use of high-quality craft skills, materials and details. The building has historic interest since it illustrates the pioneering changes to the treatment of disabled children in the late 19th century. There may be an element of communal value since it is essentially a public building, with strong associations for many former staff, patients and others. The building has strong group value with the listed Main Building and associated RPG.

Contribution made by setting to significance

- 57. The historical connections between the building and the Main Hospital and the RPG add to significance. The building gains significance from its location within the curtilage of the main listed building and its co-location with it. There are some visual connections between the building and the Main Hospital. Map regression shows that the building, like the Main Hospital, historically faced southwest across open countryside (now the site of proposed development) and the cemetery. This view was partially blocked and the sensation of direct physical and visual access was harmed by the erection of the Morrison Building circa 1931, which stands in front of this building.
- 58. The immediate setting of the building is now the modern development to the immediate south and north, including John Hunter Avenue. This frames and provides an axial vista of the main entrance tower of the building, although this effect is interrupted by the Morrison Building. Both Glenburnie Road (in front of the building) and John Hunter Avenue are currently dead ends, leaving the building truncated in terms of legibility of access.

Heritage impacts and benefits

59. Blocks C and D are five storeys (39.63m AOD) in height. These blocks are located relatively close to the main southwest elevation of the listed building. As shown in BHTVIA Views 1, 7 and 9 and TVIA Addendum Views 1 and 9, these blocks will rise above the treeline of the belt of trees even in summer months. Blocks C and D will slightly challenge the scale of the listed building and will intrude into the setting of the listed building, particularly in views from the

southwest such as Views 1 and 9, distracting from the primacy of the listed building in the view. This causes harm to the contribution made by setting to the significance of the listed building, although it is acknowledged that this is not the main axial view of the principal elevation. **This harm is considered to be less than substantial at a low extent.**

Icehouse at Springfield Farm, listed Grade II

- 60. This icehouse likely dates from the 18th century and is the last remaining building of the estate at Springfield Farm. It consists of a circular domical subterranean building made of brown and yellow brick. The icehouse is covered in earth, creating a mound that has retaining walls to the approach. In use, ice was collected from shallow ponds built for the purpose in the winter months. The ice was placed in the ice house, where the cool environment and the massing of the ice together allowed it to remain frozen during the following summer, providing the luxury of ice for drinks and ice cream. Ice houses are high status features associated with substantial country houses.
- 61. The building has archaeological value since it evidences past lifestyles and the construction of these unique buildings. The building has historical value as a structure relating to the lost estate at Springfield Farm, in place before the hospital.
- 62. The setting of the icehouse makes some contribution to significance. There are historical links with the hospital, since the farm later formed part of the curtilage of the institution and was used for occupational therapy. The visual setting of the ice house has now changed beyond recognition (it is now in the grounds of Burntwood School) and this contributes nothing to significance.
- 63. The proposed development causes no harm to the significance of this building.

Gatton Primary School, listed Grade II

- 64. This building was originally known as Broadwater Road School and is listed under that name. It was previously known as Wandsworth College Broadway Centre and the Ensham Secondary School Annexe, but is now Gatton Primary School. This was built around 1900 (opening in 1904) for School Board for London, designed by Thomas Jerram Bailey (1843-1910). The building is a fine example of Bailey's later, Edwardian manner, using yellow stock bricks, stone and red brick dressings with tile roofs.
- 65. The building has evidential value since it shows late Victorian and early Edwardian school planning. The building has architectural and artistic value since it is a striking and handsome building by the leading school architect of the period, with fine and well-crafted materials and details, together with a dramatic and unusual massing and form. The building has historical value through its connection with Bailey, the author of *The Planning and Construction*

- of Board Schools (1900). There may be some communal value as a public building with links to past and present staff, students and parents.
- 66. The setting of the school is mainly defined by its walled curtilage, which is retained. The wider urban setting is middle 20th century houses, which is later than the school and does little to contribute to significance. There is no historical, spatial or visual relationship with the site.
- 67. There is no mutual intervisibility between this building and the site. **No harm is caused.**

Lodge to St Clement Danes Almshouses, listed Grade II

- 68. The Lodge to St Clement Danes Almshouses is a Gothic Revival building by architect Robert Hesketh RIBA (1817-1880) and dates from 1848. The Lodge consists of a single storey made of red brick with stone dressings, grey brick diaper, and tiled saddleback roof. The building has archaeological value as evidence of mid-Victorian almshouse construction. The building has historical value through its age and survival. The building has architectural value through its forms and architectural features which relate to the range of almshouses and chapel to the immediate south. The building has historical value through its association with contemporary philanthropy and the work of Hesketh. The building has group value through its association with the almshouses and their chapel and the nearby listed Church of St Mary (Summers Town).
- 69. The building's setting is defined by the open space and courtyard of the almshouses to the south of the Lodge. The spatial relationship between these freestanding buildings accounts for a significant amount of open space between the structures. The Lodge is best viewed from Garratt Lane with the almshouses seen in the distance. There is no historical or visual connection with the site.
- 70. TVIA Addendum VuCity Model Shot 1 page 14, Shot 2 page 15 and Shot 3 page 16 show that there is no mutual intervisibility between this building and the site. **No harm is caused.**

Magdalen Park Conservation Area

Significance

71. Magdalen Park Conservation Area was built on land belonging to Magdalen College, Oxford after 1868. It derives its historical and architectural significance from the presence of the Fieldview and Openview Estates. These were designed from 1911 by the Holloway Brothers (including Sir Henry William Hollway) and later by architects H F Murrell and R M Piggott FRIBA between 1931 and 1938. Its reasons for designation include its exceptional example as an inter-war planned housing estate, and for the design of its buildings and the overall layout of the estates.

Contribution made by setting to significance

72. Green space within the setting contributes greatly to the heritage value of the Magdalen Park Conservation Area as well as its proximity to heritage assets such as Springfield Hospital and its associated listed buildings and RPG. The residential character of the surrounding vicinity ties in with Magdalen Park Conservation Area's historically and architecturally significant housing estates, creating a continuity in character beyond the borders of the Conservation Area and high permeability for residents.

Heritage harms and benefits

73. In BHTVIA View 8 the proposed development is shown in the setting of the Magdalen Park Conservation Area. The development is not visible in this view. **No harm is caused.**

The former Chapel of Springfield Hospital, 61 Glenburnie Road.

- 74. As noted above, this building is curtilage listed as part of the hospital Main Building. The building is also locally listed by the London Borough of Wandsworth. The chapel was a later addition to the hospital and appears on maps after 1869 and before 1894. No information is available on its architect or precise date. Its function was to provide a space of religious assembly for staff and patients at the hospital.
- 75. A site visit has shown that it is an attractive exercise in muted institutional late Gothic Revival. It is roughly cruciform in plan, with liturgical east actually at northeast. The building features a chancel, north and south transepts, two vestries and a wide chancel with both north and south aisles to accommodate a large congregation. The building is not hugely elaborate, being constructed of yellow London stock brick under a slate roof, but it does include natural stone tracery in a Decorated style and a small roof mounted louvred steeple with a weathercock.
- 76. The building has significance as a well-designed and charming late Victorian asylum chapel with materials and details characteristic of the period, reflecting the contemporary interest in the religious well-being of staff and patients. The significance derived from setting mainly relates to its co-location with the listed hospital buildings and the visual and historical links this provides.
- 77. There is no intervisibility between the chapel and the proposed development. **No harm is caused.**

Streatham Cemetery.

- 78. The cemetery including the two chapels within it are locally listed by the London Borough of Wandsworth.
- 79. Streatham Burial Board acquired land to the south of the hospital for use as a cemetery under the Metropolitan Burial Act 1852, which followed the second cholera epidemic of 1848-49. This land remained unused for several decades and was separated from the hospital by a boundary of trees. The 23 acre Streatham Cemetery opened for burials in 1893. The cemetery featured two

Gothic Revival chapels of grey ragstone designed by William Newton-Dunn. As was characteristic of Victorian religious apartheid, one was for members of the Church of England, while the other was for Nonconformists. Interesting monuments include the pile of granite blocks on the Krall grave (1903) and Henry Budden's small blue terracotta temple (1907). The cemetery is well planted and there are a number of historically interesting tombs, including that of Sir Wyke Bayliss (d.1905), President of the Royal Society of British Artists. The establishment of Streatham Cemetery signalled a response to a cholera epidemic of the mid-19th century, though the site came into its more prominent use during the First and Second World Wars. Its setting within the local community and its open character in an increasingly dense area strengthens its heritage value.

- 80. The built relationship between the cemetery and the site is currently very poor, consisting of an ugly mid-20th century concrete plank fence, with no route through between the two sites. There are some loose historical links between the cemetery and the site, as areas of open land in institutional use and it appears likely that some patients of the hospital may have been buried here (unusually there appears to be no known asylum cemetery). The site contributes positively to the setting of the cemetery, since the belt of trees to the southern perimeter of the site serve to provide a calm and attractively sylvan setting to the cemetery.
- 81. Direct works are proposed (DAS Para 6.1) to create a new pathway through the cemetery, leading to a new entrance between the site and the cemetery, framed by an area of railings and an arched opening, which in turn leads to a cultural park with wood carvings proposed. **These proposals are welcomed and would create a heritage benefit**, with part of the concrete fence removed and a useful and attractive route through provided, increasing the usability of both the cemetery and the site and knitting the cemetery closer into the scheme.
- 82. The visual impact of the proposed development has been thoroughly reviewed and is illustrated in BHTVIA Views 3, 4, 5 and 12 and TVIA Addendum Views 14a and 14b. In some views the proposed development will rise above the treeline to some extent and will occasionally be clearly visible. This causes harm to the contribution made by setting to the significance of the Non-Designated Heritage Asset, since it erodes the calm and sylvan setting. **This is considered to cause harm at a low level.**
- 83. The proposed details of the new link between the cemetery and the site are currently available in sketch form only (DAS Para 6.1 and Archaeological Desk-Based Assessment Part 2 Figure 19a). While what is proposed appears appropriate in principle, a condition is needed to provide the relevant details. A term is required in the Section 16 Agreement to secure the heritage public benefit.

Garratt Green (locally listed).

- 84. Garratt Green is a nearby open space which is locally listed by the London Borough of Wandsworth. It is located to the east of the Springfield Hospital Main Building. The open space is documented to have existed since at least 1746 and may well be much older. Garratt Green functioned as common land (for grazing) and has survived as an open space along the historic Burntwood Lane despite suburban development in the area over the centuries. It is Common Land and is protected in the relevant legislation. The land is a welcome breathing space locally and is bordered by mature trees.
- 85. There is no intervisibility between this asset and the site. **No harm is caused.**

Summary of heritage benefits

- 86. GLA officers consider the following to be heritage benefits, in comparison with both the existing condition on the ground and the consented 2012 scheme:
 - The creation of a new pedestrian connection between the site and Streatham Cemetery is positive and improves access and permeability within and towards this Non-Designated Heritage Asset. This benefit will need to be robustly conditioned and appropriately secured.
 - The removal of Block X, proposed to be located within the RPG in the 2012 scheme and resulting in the complete loss of the belt of trees which form part of the historic boundary of the RPG, is an important enhancement. As well as eliminating direct impacts on the RPG and saving the tree belt, this change allows for an improved and unobstructed view of the listed Springfield Hospital Main Building from within Streatham Cemetery (illustrated at age 48 of the DAS).
 - The demolition of the Morrison Building and the proposed arrangement of Blocks A to D creates a new axial view of the main entrance and tower of the listed Elizabeth Newton Wing (illustrated at page 144 of the DAS). This provides an enhancement of the setting of this building by framing and highlighting one of its principal element.

Commentary on the position of other parties

London Borough of Wandsworth

87. The Officers' Report to Committee (19th March 2024), following an analysis (Paras 4.27 to 4.32) which has many commonalities with the above, concluded on heritage matters that: "Officers accept that the degree of harm identified would be comparatively minor, and they conclude this would be to the lower end of 'less than substantial' harm. Nevertheless, in accordance with paragraph 208 of the NPPF where it is considered a development would lead to 'less than substantial harm' to the significance of a designated heritage asset, whatever that degree of harm may be, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." GLA officers broadly agree with this conclusion.

88. It is noted that Wandsworth Council members refused the scheme. However, it is noted that the reasons for refusal did not include a reason relating to heritage.

Historic England

89. Historic England responded to consultation with an email dated 25th January 2023 which stated that "On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England".

The Gardens Trust (London Parks and Gardens)

- 90. This statutory amenity society responded to consultation in a letter dated 1st February 2023 which stated: "This is not a good location for high buildings because of the visual impact on the Grade II listed main hospital building, Grade II listed hospital grounds and on the cemetery. LPG supports the retention of the trees between the development and the hospital building. LPG supports the retention of the trees along the southwest boundary with Streatham cemetery. LPG suggests a better tree screen along the southeast side to provide a visual break between the development and the cemetery. It is not clear how the proposed new pedestrian route through the cemetery can be made without disturbing a significant number of graves."
- 91. The visual impacts on the setting of the listed buildings, the RPG and the cemetery are discussed above. The proposals include the replacement of the trees which are removed on the site. Consideration has been given to the path and the graves and the proposals, which will be subject to condition, are intended to avoid the removal of graves.

Other consultees

92. A number of public consultees raise concerns around the impacts on the setting of the listed buildings, the RPG and the cemetery. These matters are addressed above.

Summary tables

- 93. Overall, GLA officers consider that the proposed development causes the following harms to designated heritage assets (in all cases the assessment is based on the cumulative scenario).
- 94. The scale for extents of harm used is very low, low, low to middle, middle, middle to high, high and very high.

Designated heritage asset	Category of harm	Extent of harm	Shown in view
Springfield Hospital Registered Park and Garden, Grade II	Less than substantial	Low	BHTVIA Views 1, 2, 3, 5, 6, 7,
			9, 10, 11 and

			12; TVIA Addendum Views 1, 6, 9 and 10
Springfield Hospital (Main Building), listed Grade II	Less than substantial	Low	BHTVIA Views 1, 2, 6, 9, 10 and 11; TVIA Addendum Views 1, 6, 9 and 10
Elizabeth Newton Wing, listed Grade	Less than substantial	Low	BHTVIA View 1, 7 and 9; TVIA Addendum Views 1 and 9
Gatton Primary School, listed Grade	No harm	No harm	No view provided
Icehouse at Springfield Farm, listed Grade II	No harm	No harm	No view provided
Lodge to St Clement Danes Almshouses, listed Grade II	No harm	No harm	TVIA Addendum Vu City Model Shot 1 page 14, Shot 2 page 15 and Shot 3 page 16
Magdalen Park Conservation Area;	No harm	No harm	BHTVIA View 8

- 95. Overall, GLA officers consider that the proposed development causes the following harms to non-designated heritage assets (in all cases the assessment is based on the cumulative scenario).
- 96. The scale for extents of harm used is low, middle and high.

Non-designated heritage asset	Extent of harm	TVIA view
Streatham Cemetery	Low	BHTVIA Views 3, 4, 5 and 12;TVIA Addendum Views 14a and 14b
The former Chapel of Springfield Hospital	No harm	No view provided

Garratt Green	No harm	No view provided
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Conservation conclusions

97. The heritage harms and heritage benefits are as discussed above. The GLA does not support the use of the internal balance of harm, following the Bramshill cases.² The GLA view is that heritage benefits should not be offset against heritage harms, reducing the extent of heritage harm. To do so undermines the principle of the irreplaceable nature of heritage, as well as leading to double counting and discouraging the exploration of less harmful options required by the NPPF. Heritage and heritage-related benefits, where they exist, are public benefits and should, in our view, be weighed in the balance along with all the other public benefits.

Local plan assessment

- 98. London Borough of Wandsworth Local Plan 2023-2038 (Adopted July 2023). Environmental Objective 4 states "4. Protect and enhance the borough's built environment including its heritage assets and public realm." LP3 Historic Environment (Strategic Policy): "A. 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), and the historic environment."
- 99. The proposed development is contrary to Wandsworth Local Plan Objective 4 and Policy LP3 and the Historic Environment SPG because harm is caused to heritage assets.

London Plan assessment

100. The proposed development is contrary to *The London Plan Policy HC1*Heritage conservation and growth Part C: "Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings".

National Planning Policy Framework assessment

- 101. The proposed development has considered options and used good design, seeking to avoid and minimise harm. Overall, GLA officers consider that the proposed development causes some harm to designated heritage assets. This is considered to be less than substantial harm at a low extent.
- 102. National Planning Policy Framework Paragraph 208 states that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal..." The harm caused is considered to be justified and outweighed by the public benefits of the scheme.

² City and Country Bramshill v SoS HCLG [2019] EWHC 3437 (Admin) and [2021] EWCA Civ 320

103. Overall, GLA officers consider that the proposed development causes some harm to non-designated heritage assets. This harm is considered to be at a low extent. National Planning Policy Framework Paragraph 209 requires a balance to be struck between the harm caused by proposals to a Non-Designated Heritage Asset, the significance of the asset and the wider planning benefits of the scheme. The harm caused is considered to be justified and outweighed by the public benefits of the scheme.

Not for inclusion in the report

Relevant known planning history

Main hospital site: GLA refs: 2017/1074f/S1 (Stage 1); LPA refs: 2010/2703 (granted on appeal in 2012, APP/H5960/A/11/2156427 and APP/E5960/E/11/2156424.

This site: GLA refs: 2022/0497/P2i (pre-app), 2023/0062/S1, 2023/0171/S2; LPA refs: 2022/5288.

From:
To:

Subject: Springfield Hospital - urban design and conservation

Date: 10 July 2024 15:24:47

- MOL boundary just south of Morrisons Building
- Trees retained between site and Springfield Park
- Linear connection to Elizabeth Newton Wing
- Parameter plans 79 units in typologies included in HTVIA?
- MOL and RPG boundary
- MOL previously developed land NPPF 154(g) appropriate development
- Building footprints and roads and hard standing reduced from 9,399 sqm to 5,365 sqm
- New views from Streatham Cemetery towards the main building
- Requested greater volume
- Consented scheme did not provide access to the cemetery
- X, Y or Z not of interest to PINS / SOS
- Significant deficit in FVA
- Comparison views higher resolution
- Landscaping and interaction with amenity spaces
- VuCity model views and interaction
- Block B entry B4 residential unit entrance isolated? Suggestions include lighting, natural surveillance. Fob access required.
- Views towards side of blocks -
- Replacement of the heritage and townscape part of EIA authorship, qualification
- ZTV overlayed with heritage assets
- Request for updated pictures from March 2022 will be summer views, VuCity winter
- Tim low level of harm to the hospital blocks away from hospital and RPG
- Additional storey on Block C acceptable
- Beefing up belt of trees
- Trust condition or obligation nowhere else to go needs to Tolworth
- Pathway to cemetery in S106
- Benefits secured for heritage harm
- Bus contributions? Additional services for Spri
- Social rent for management reasons
- Trio for ES Vinegar Yard
- Assessment on non-designated heritage assers

From:

Sent: 12 August 2024 15:27

To:

Subject: Springfield Hospital

Attachments: 17_View 13 Streatham Cemetery Existing_2.jpg

Follow Up Flag: Follow up Flag Status: Flagged



Hope you had a great weekend.

Las night I reviewed the pack the applicant provided following our pre-application meeting. The pack provides clarification on homes that have balconies or terraces at ground floor which is useful in terms of understanding the site levels and how private amenity interfaces with the communal garden. Please be advised that the information in page 7 does not appear to be complete - some balconies/terraces are not identified in Block D2 & C1.

Additional information is also provided relating to pedestrian route to Block B4 entrance, A CGI shows the quality of the route whilst plans show that the route would also be overlooked by ground floor homes and their terraces providing natural surveillance. A condition covering landscaping including lighting in the public realm and communal gardens should be added to ensure delivery of quality and safe public realm.

I also had a look at the VU.CITY model and the views study that includes viewing locations in the southeast of the cemetery (View 13 – Streatham Cemetery Existing _2 (trees with leaves)) which I consider acceptable.

I also tested a closer view to the development from the southeast part of the cemetery which is also considered acceptable. See view below.



There are many positive aspects to the scheme. Here are a few that I listed during our pre-app discussion with the applicant.

- Use the topography integrates well.
- Removal of large step up in levels as seen in consented scheme.
- Stepping down the height of the proposal. Hospital maintains the primary height of listed buildings at the top of the landscape
- Development has increased distance from heritage assets.
- · Retention of historic line of trees to RPG
- More trees to the historic park
- Between three and five storeys scale of development not unusual for the context.
- Reduction in footprint and hardscape compared to the existing situation
- Connection between the site and cemetery. Improved access between the MOL and registered park.
- Replacement of boundary with the cemetery.
- Retention of trees along the cemetery

It is worth noting that LB Wandsworth committee report in regard to design is thorough and comprehensive.

Best wishes,

