Queen Mary’s Hospital, Sidcup
in the London Borough of Bexley
planning application no. 13/00593/FULM

Strategic planning application stage 1 referral

The proposal
Demolition of the existing buildings and the erection of two three storey buildings comprising a 60 bed care home and 47 extra care apartments with associated access roads, provision of parking and landscaping.

The applicant
The applicant is Anchor, and the architect is Atkins.

Strategic issues
The principle of redevelopment of this previously developed site in the Green Belt is considered broadly acceptable. Further information with regards to affordable housing, inclusive design, climate change and transport is required before the scheme can be considered fully compliant with the London Plan.

Recommendation
That Bexley Council be advised that the application broadly complies with the London Plan, but there are some outstanding issues that need to be resolved before it can be considered fully compliant and the potential remedies are set out in paragraph 52 of this report.

Context
1 On 19 June 2013 the Mayor of London received documents from Bexley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 30 July 2013 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: “(a) development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and
(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.”

3 Once Bexley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 Situated on the southern fringe of Sidcup, the application site comprises an area of approximately 1.4 hectares that forms the western end of the wider Queen Mary’s Hospital grounds. Queen Mary’s Hospital is situated approximately one mile south of Sidcup town centre, and north west of Foots Cray. The application site is designated as Metropolitan Green Belt in Bexley Council’s Proposal Map.

6 The application site is immediately bound on its north, west and south sides by Frognal Avenue, which is accessed from the west via the A222 Chislehurst Road and forms the main access route to the site. Approximately sixty metres to the south of the site is the A20 Sidcup Bypass Road with forms part of the Transport for London Strategic Road Network.

7 Although the nearest railway station, Sidcup, is around 1.7km away and the site is on the edge of the built up area, the Queen Mary’s Hospital complex is well served by buses, with six routes providing links to railway stations, town centres and residential areas. This gives the site a public transport accessibility level (PTAL) of 3, where 1 is the lowest and 6 is the highest.

8 The site currently accommodates the former maternity wing to the hospital, which comprises a large vacant building ranging from one to three storeys. The building is surrounded by areas of hard standing that serve as a series of car parks and service areas and is heavily screened by mature vegetation on its southern and western boundaries. The building is currently earmarked for demolition as part of the wider masterplan proposals for the Queen Mary’s Hospital site.

Details of the proposal

9 The proposals are for the demolition of the buildings on site and the erection of two, three storey buildings comprising a sixty bed care home and 47 extra care apartments, with associated access roads, car parking and landscaping.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL London Plan
- Housing London Plan; Housing SPG; Urban design London Plan;
  Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Access London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
• Sustainable development  
  London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy

• Transport  
  London Plan; the Mayor’s Transport Strategy; Land for Transport Functions SPG,

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Bexley Core Strategy 2012, the 2004 Bexley UDP and the 2011 London Plan.

12 The following are also relevant material considerations:

• The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework

• The Early Minor Alteration to the London Plan

Principle of Development

13 The application site is part of a larger area designated as Metropolitan Green Belt. London Plan policy 7.16 states that “the strongest protection should be given to London’s Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances.” The National Planning Policy Framework (NPPF) gives further guidance in paragraphs 89 and 90 on what constitutes appropriate development in the Green Belt and states that the “limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt” is not inappropriate development.

14 As the site is currently occupied by the substantial one to three storey building that was the former maternity ward to the hospital, it is ‘previously developed land’ as defined by the glossary to the NPPF. Therefore, the principle of redeveloping this site in the Green Belt is appropriate in the context of National Planning Policy, however, it is necessary to assess whether the proposals would have a greater impact on the openness of the Green Belt.

15 The proposals will effectively consolidate the existing built form on the site, by creating two new L-shape buildings that wrap around a new central landscaped courtyard. The applicant has provided information on the existing and proposed building footprints and areas of hard standing, which is summarised in the table below. As a result of the proposals, the overall built footprint in this area of the Green Belt would be reduced by a total of 1,441 sq.m. which is supported.

Footprint comparison (taken from applicant’s Design & Access Statement)

<table>
<thead>
<tr>
<th></th>
<th>Built Footprint (sq.m.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing building</td>
<td>3,925</td>
</tr>
<tr>
<td>Proposed buildings</td>
<td>3,012</td>
</tr>
<tr>
<td>Existing hard standing</td>
<td>2,318</td>
</tr>
<tr>
<td>Proposed hard standing</td>
<td>1,790</td>
</tr>
<tr>
<td>Total reduction in footprint</td>
<td>1,441</td>
</tr>
</tbody>
</table>
16 In order to reduce the overall built footprint on the site, the proposed buildings are marginally taller with a consistent building height of three storeys as opposed to the existing building which ranges from one to three storeys. The applicant has provided visualisations confirming that the proposed buildings represent a slight increase in height over the existing at their tallest point, however, this increase is considered marginal and does not raise any concerns. While slightly larger in scale, the proposed layout will however, create new views into and through the central courtyard space from the north east and south west corners of the site where the blocks terminate. This visual separation between the two blocks and the views of the newly landscaped courtyard will improve the open nature of the Green Belt at these locations and is supported.

17 The western and southern boundary of the site is heavily screened by a belt of mature trees which currently restrict views into the site. The applicant has surveyed the trees to assess their quality which has partly informed the landscape strategy. The strategy seeks to maintain those trees of quality and compliment them with additional planting to create a transitioning landscape from the natural surrounding green belt environment, to a more controlled green buffer zone to the site and the formal landscaped gardens within the building line.

18 On balance, while the scale of the proposed building appears slightly larger than that which is existing, the proposed layout and reduced building footprint will increase the open nature of the site by creating new views through the site and into the proposed landscaped courtyard. The impact of the proposed building will also be mitigated by the existing screening provided by the surrounding mature trees which will be further complimented by additional planting. The proposals will not have a greater impact on the openness of the Green Belt and is considered acceptable in National and London Plan policy terms.

19 In addition to the above, the London Plan identifies the need for London’s housing market to meet the requirements of the capital’s changing age structure, in particular the varied needs of older people. The redevelopment of this derelict site will help contribute towards meeting this need through the provision of a sixty bed care home and 47 extra care apartments (Use Class C2) and is supported in accordance with London Plan policy 3.8, further supporting the principle of development in this part of the Green Belt.

**Affordable housing**

20 Past practice on similar care village applications has demonstrated that it may sometimes be difficult to categorise such schemes clearly under the Use Classes Order. Where standalone retirement units are proposed with independent living or flexible care, uses may appear to straddle the C2 (residential institution including nursing and care homes) and C3 (dwelling houses) use categories.

21 Previous cases have shown that where independent living units can be bought or rented as if they were residential properties they should be treated as C3 use, and therefore, subject to affordable housing policy.

22 The submitted application form classifies the whole development, including the extra care component, as C2 use Residential Institution. However, while the covering letter attached to the planning application states that the Council agrees this is a C2 use, in the absence of information regarding how this definition has been reached, the applicant should provide further information on the proposed care products to be made available, layouts of the extra care flats, details of the provision of communal facilities, details of the proposed service charges and the age restrictions attached to the occupation of the extra care units in order for the GLA to make an appropriate
assessment of the land use. The GLA would be keen to explore the matter further with the applicant to clarify the status of the development.

**Urban Design**

23 The proposed development is part of the wider hospital campus, replacing the existing Kent Woman’s Wing with a three storey building to accommodate a new care home. Whilst the proposed development is located within the greenbelt and is slightly higher and bulkier than what is currently on the site, it replaces an existing building, and follows a very similar but reduced footprint and, as part of the campus, is well screened by vegetation. Officers are satisfied that the scheme has little impact on the openness of the Green Belt and poses no strategic design concerns.

**Inclusive Design**

24 The Mayor’s Housing SPG gives further detailed advice regarding the provision of housing for older Londoner’s. Given the nature of the scheme and the developer’s commitment to meeting high standards, the design should ensure that it achieves the highest standards of accessibility and inclusive design. The development provides the opportunity to demonstrate best practice in line with the objectives of the Housing our Ageing Population Panel for Innovation report (HAPPI) [http://www.homesandcommunities.co.uk/ourwork/happi](http://www.homesandcommunities.co.uk/ourwork/happi), and the applicant should demonstrate how the development responds to the key principles outlined in the report.

25 The Design and Access Statement does not make any reference to whether any of the homes have been specifically designed to be wheelchair accessible. Given the nature of the scheme, the applicant should provide further detail showing how the development achieves this and in particular whether any of the bathrooms within the extra care units and care home meet the wheelchair housing design guide standards. The Housing LIN Design Principles for extra care housing recommends that wheelchair accessibility and future adaptability of the units is considered out the outset. The guidance can be found here: [http://www.housinglin.org.uk/Topics/browse/Design_building/Design/?parent=858&child=5145](http://www.housinglin.org.uk/Topics/browse/Design_building/Design/?parent=858&child=5145)

26 The submitted floor plans show that all the apartments are of a generous size and are served by two lift cores. The site is level and the landscape strategy aims to provide “inclusive access for all with ‘level’ thresholds throughout, enabling customers and staff an accessible, clear entrance and exit throughout the care facility.” This is supported. The applicant is recommended to consult with the local disabled and older people’s organisations on the detailed design of the scheme.

27 Whilst the landscape strategy is welcomed, the pedestrian routes to and from the site should be reconsidered so that there are dedicated accessible routes away from vehicular movements that provide direct access from the adjacent street to the front entrances. In addition, there should be dedicated accessible routes to the bus stops that serve the site. Please see paragraph 44 of this report for further detail.

**Climate Change**

**Energy Efficiency**

28 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting and mechanical ventilation with heat recovery. The
demand for cooling will be minimised through the use of natural ventilation and high performance glazing.

29 The applicant has not provided any carbon dioxide emissions data. A commitment to the development improving on the 2010 Building Regulations compliance level through energy efficiency alone should be provided. An estimation of the proposed reduction in regulated carbon dioxide emissions (expressed in tonnes per annum and in percentage terms) compared to a 2010 Building Regulations compliant development must also be provided.

District Heating

30 The applicant has carried out an investigation and states that there is no existing or planned district heating networks within the vicinity of the proposed development. However, a commitment to ensure that the development is designed to allow future connection to a district heating network should one become available has been confirmed and is supported.

31 The applicant should confirm how the development will be heated and heat load profiles should be provided. In doing so, the applicant should commit to an onsite heat network that links all apartments and other non-domestic buildings that is served from a single energy centre. A drawing showing the route of the heat network linking all the buildings on site should be submitted. In addition, the applicant should confirm the floor area and location of the energy centre.

Combined Heat and Power (CHP)

32 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable Energy Technologies

33 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install roof mounted photovoltaic panels. The applicant should confirm the area of the proposed panels and provide a roof drawing showing their location.

34 The applicant is investigating the use of air source heat pumps as an alternative to solar photovoltaic panels. If this option is pursued, further details on air source heat pumps should be provided. The applicant should note however, that if adopted, only communal air source heat pumps serving all dwellings and other building uses would be compliant with London Plan energy policy.

35 The applicant must provide information on the estimated reduction in regulated carbon dioxide emissions (expressed in tonnes per annum and in percentage terms) from this third tier of the energy hierarchy compared to a 2010 Building Regulations compliant development.

36 Taking into account the comments above, a detailed energy strategy in line with the GLA’s energy assessment guidance, September 2011 must be provided. Details of regulated carbon dioxide emissions and savings at each tier of the energy hierarchy should also be submitted. This should be presented in the same format as Table 1 & 2 of the guidance.

Transport

37 Although the transport assessment does not provide an assessment of non-car trip generation, due to the nature and size of the proposed development, the number of trips
generated by vehicle or public transport is unlikely to have a detrimental impact on the transport network. The predicted car trip generation is significantly lower than the existing permitted use.

38 The development includes the provision of 59 car parking spaces. There is no car parking standard for this land use in the London Plan, however, it is noted that the Council’s maximum parking standards are applied to the total number of staff (58 fulltime), yet the transport assessment predicts that the maximum number of staff on site at any one time would be 25. Notwithstanding the site’s accessibility by bus and other sustainable modes, it is possible that because of the availability of car parking, any staff member who wishes to drive will do so. This is contrary to London Plan policy 6.1. Also, it is not clear how more general hospital parking will be prevented. Information on how the spaces will be allocated and managed and justification of the number should therefore be provided, and a planning condition imposed requiring a car parking management plan. It will also be important to ensure that the travel plan measures in the transport assessment, with mode share targets, are appropriately monitored and secured within the planning permission.

39 It is noted that seven of the car parking spaces would be designated for Blue Badge holders. Given the nature of the development proposed, consideration should be given to increasing the number of these spaces and/or enlarged normal spaces to meet likely demand.

40 Based on the 25 predicted maximum staff members on site, eight cycle spaces are proposed for staff which accords with London Plan standards. These stands should be covered and secured, and in a well-lit location. It is noted that showers and lockers would be provided for those who cycle to work, which is supported.

41 There appears to be no cycle parking proposed for residents and their visitors. Whilst it is accepted that care home residents are unlikely to cycle, consideration should be given to making some parking available for those people living in the extra care apartments, which could perhaps be used alternatively for personal mobility scooters. Convenient cycle parking for visitors should also be provided.

42 One existing bus shelter is within the application boundary. The applicant should confirm that this shelter would not be affected by the development, as loss of the shelter would conflict with London Plan policy 6.2. The transport assessment does not audit the nearby bus stops for accessibility levels, which is particularly important given the nature of the land use. This information should be provided and a contribution sought to improving accessibility if required.

43 There is a bus stand adjacent to the site on the south west frontage of Frognall Avenue. Whilst this is shielded from the development by trees the specification for the nearby bedroom windows should take account of this noise source as well as from the nearby A20 Sidcup Bypass Road.

44 The site layout for pedestrians, particularly connections to the nearby bus stops, seems poor and should be reconsidered. There are no direct footpaths to either of the bus stops on Frognall Avenue, with the proposed access currently requiring pedestrians to walk across the car park and via one of the development’s vehicular accesses. Apartment residents and visitors would have the choice of a long walk within the site or through another car park when arriving or departing on foot. This is not satisfactory and should be revised, especially given the likely more limited mobility of the residents. The applicant should also undertake a Pedestrian Environment Review System (PERS) audit for routes outside the site should and a contribution made to improvements if identified.
Taking into account the above comments, the applicant should provide the further information and commitments outlined above in order to address the outstanding transport issues.

Community Infrastructure Levy

The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail.

The Mayor has arranged boroughs into three charging bands. The rate for is £20/sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: [http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents](http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents) as amended by the 2011 regulations: [http://www.legislation.gov.uk/uksi/2011/987/made](http://www.legislation.gov.uk/uksi/2011/987/made)

London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Bexley Council has yet to adopt a scheme has adopted a scheme. See the council’s website for more details.

Local planning authority’s position

At the time of writing the Council’s position was unknown.

Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on Green Belt, housing, urban design, inclusive design, climate change and transport are relevant to this application. Although, the application broadly complies with the London Plan, there are some outstanding issues that need to be resolved before it can be considered fully compliant and these and their potential remedies are set out below:

- **Green Belt**: The principle of the redevelopment of previously developed land in this location is acceptable, as the proposed building will not have a greater impact on the openness of the Green Belt than that which already exists.
• **Housing**: The provision of a care home and extra care home will help meet the requirements of London’s changing age structure, and in particular the varied needs of older people in accordance with London Plan policy 3.8.

• **Affordable Housing**: The applicant should provide further information regarding the details of the extra care component of the scheme clarifying whether it is C2 or C3 use.

• **Urban Design**: The heights, scale, massing and architecture of the scheme are generally acceptable and do not raise any strategic urban design issues.

• **Inclusive Design**: In line with the issues raised, the applicant should provide further detail on how the scheme will meet accessibility standards, in particular wheelchair accessibility. Further consideration should be given to the provision of dedicated accessible pedestrian routes away from vehicular movements, to and from the entrances and the adjacent bus stops.

• **Climate Change**: The applicant must provide a detailed energy strategy in line with the GLA’s energy assessment guidance, September 2011. The applicant should confirm the area of the proposed photovoltaic panels and provide a schematic showing their location. Details of regulated CO₂ emissions and savings at each tier of the energy hierarchy should also be submitted. This should be presented in the same format as Table 1 & 2 of the guidance.

• **Transport**: There are a number of areas that require resolving before the scheme can be considered fully in accordance with London Plan transport policies. These relate to information on parking, cycle parking, impact on adjacent bus stops and their accessibility and the pedestrian environment.

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