

# St George's Hospital, Suttons Lane, Hornchurch

in the London Borough of Havering

planning application nos. P0321.15 & P0323.15

## Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

## The proposal

Two linked applications:

D&P/3629/01: The redevelopment of the St George's Hospital site to provide up to 3,000 sq.m. of new healthcare facilities, on 1.74 ha of the wider site, together with construction of a new vehicular access from Suttons Lane, associated car parking, landscape and infrastructure works.

D&P/3629a/01: The redevelopment of the St George's Hospital site to provide up to 290 dwellings, on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works.

## The applicant

The applicant is **NHS Property Services** the agent is **SW Planning Ltd.**

## Strategic issues

The principle of the proposed development raises issues in relation to brownfield development within the **Green Belt**.

Other issues that need to be addressed before the application is referred back to the mayor at stage two relate to **affordable housing, children's & young person's play, urban design, access, sustainable energy, flood risk** and **transport**.

## Recommendation

That Havering Council be advised that while the applications are generally acceptable in strategic planning terms the applications do not comply with the London Plan, for the reasons set out in paragraph 91 of this report; but possible remedies set out in that paragraph could address these deficiencies.

## Context

1 On 1 April 2015 the Mayor of London received documents from Havering Council notifying him of two 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 20 May 2012 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 Both applications are referable under Category 3D of the Schedule to the Order 2008:

*a) 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 The second housing application is also referable under category 1A:

*Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*

4 Once Havering Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision, as to whether to direct refusal, allow the Council to determine them itself or in the case of the second application, take it over for his own determination.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

6 The site is located within the Green Belt and is bound to the north by residential houses in Hacton Drive and to the west by Suttons Lane, with residential housing facing the site. To the east and south are open areas of Hornchurch Country Park and the River Ingrebourne.

7 The site is occupied by 27 large former institutional blocs of the former St George's hospital and the development area (footprint) extends to approximately 17,614 sq.m. with built envelope (footprint and hardstanding) extending to circa 42,998 sq.m accounting for 82% of the site.

8 The site is located approximately 600m south of Hornchurch Underground Station, also, two bus services serve the site running along Suttons Lane offering services between Hornchurch Town Centre and Collier Row, and the hospital site to Noak Hill Road. Consequently the site has a PTAL (public transport accessibility level) ranging across the site from 3 to 1b meaning the site has moderate to poor access.

## **Details of the proposal**

9 This report covers two separate but linked applications. D&P/3629/01: The redevelopment of the St George's Hospital site to provide up to 3,000 sq.m. of new healthcare facilities, on 1.74 ha of the wider site, together with construction of a new vehicular access from Suttons Lane, associated car parking, landscape and infrastructure works. D&P/3629/01: The redevelopment of the St George's Hospital site to provide up to 290 dwellings, on 10.0 ha of the wider site, together with associated car parking, landscape and infrastructure works.

## **Case history**

10 The application has not been subject to GLA pre-application process and no advice has previously been provided.

## Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Green Belt/MOL *London Plan*
- Open land *London Plan; East London Green Grid SPG; All London Green Grid SPG*
- Health *London Plan; Social Infrastructure SPG; Health Inequalities Strategy*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Housing SPG*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Historic Environment *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- 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*
- Flood risk *London Plan*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Parking *London Plan; the Mayor's Transport Strategy*

12 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 2008 Havering Core Strategy Development Plan Document, Havering Site Allocations Development Plan Document (2008) and the London Plan Consolidated with Alterations Since 2011 (March 2015).

13 The following are also relevant material considerations:

- National Planning Policy Framework.

### Principle of development

14 This report is a response to two linked outline applications that will deliver a 3,000 sq.m. health facility and 290 residential units. To establish if the land use principle is acceptable it is necessary to consider the site history, NPPF guidance and the London Plan policy relating to development on Green Belt land.

### Site history and existing use

15 The hospital site has been vacant since 2012 and a strategic outline case (SOC) has been made for redevelopment of part of the site for a new health facility and the remainder being surplus to requirements. This has been undertaken and approved by Havering Clinical Commissioning Group, NHS North East London and the City (NELC) PCT Cluster Board in 2012/13. This decision received final approval from NHS London and finally NHS England in 2014.

16 The Clinical Commissioning Group needs to develop a detailed business case for the development of the new health facility and the need to secure an outline planning permission is an important part of the business case. The site area put aside for the new healthcare facility is the maximum required. The site area that is surplus requirements is subject to a residential outline planning application, because NHS Property Services has indicated that current annual site maintenance costs are significant and the receipt from the site sale will be reinvested in the NHS.

## **Land use**

### Health Care Facilities

17 London Plan policy 3.16 (B) protection and enhancement of social infrastructure states: *“Development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.”*

18 Whilst London Plan policy 3.17 health and social care facilities states: *“Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.”*

19 The hospital site has been made available for partial redevelopment to provide a health care facility and the remainder for a residential development. The site has been subject to a hospital site review (strategic outline case (see above) and its surplus to requirements has been confirmed by NHS England. The principle of a 3,000 sq.m. health centre development is supported and is consistent with the existing lawful use of the site.

### Housing

20 Havering Council’s Core Strategy and development control policies DPD policy DC46 specifically identifies the application site *“the following sites have been defined as Major Developed Sites in the Green Belt (including): St George’s Hospital Hornchurch”*. The policy further indicates that the site should be brought forward under Green Belt assessment criteria, but *“the Council will seek proposals for residential use and community use.”*

21 The principle of residential development is therefore supported subject to the proposals meeting Green Belt tests set in the NPPF/NPPG.

## **Green Belt**

22 The application site is located in designated Green Belt, but is previously developed land currently occupied by former hospital buildings and operational ambulance station. The London Plan states that the strongest protection should be given to London’s Green Belt in accordance with NPPF guidance and inappropriate development refused, except in very special circumstances.

23 The National Planning Policy Framework states that the Government attaches great importance to Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence. The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

24 The NPPF states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Paragraphs 87 and 88 state:

*'as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.'*

25 The concept of designated major development sites promoted in the previous government guidance has been replaced in the NPPF, paragraph 89 states:

*A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:*

- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

26 The redevelopment could be considered appropriate in this circumstance.

27 Whilst, London Plan policy 7.16 states that development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

28 In assessing the application proposals the application needs to show that very special circumstances apply and that the openness of the Green Belt is not adversely affected.

### **Green Belt Assessment**

29 The applicant's assessment of the impact of the development on openness of the Green Belt relates to the built form within the Green Belt – the quantum (footprint and volume) and spread of development (development envelope). This has been undertaken comparing the development proposals against the existing hospital layout and its buildings impact on the openness and the issue of the development's visual impact and character. As the proposals are located on a brownfield site and involve redevelopment of the site NPPF paragraph 89 is of relevance and this approach is supported.

### Impact on openness

30 The proposed development is proposed within the boundaries of the former hospital and does not increase the built area of Green Built, this approach in effect checks further sprawl of the built area and creates a consistent edge to the urban form seen to the east. The application masterplan, by both removing and greening areas of existing hard standing, softens the edge to the Green Belt and draws back the developed area of the existing built area envelope.

31 Comparison of the footprint of the existing hospital buildings within the proposed development demonstrated that there is less bulk/building concentration in the proposed scheme with the development spread over a number of small residential buildings rather than a number of large institutional buildings with long runs of corridors with ancillary buildings. The existing hospital layout has large areas of hard standing, whilst the proposed health care/residential scheme results in a more efficient use of the site and has a more even spread of buildings in planned green spaces. Overall the application proposals result and the built footprint being reduced by approximately 10% and the area of built development is reduced by c9%. This is significant when assessing the development impact on the openness and integrity of the Green Belt. The proposed health care/residential scheme maintains the open views of the Green Belt of the existing hospital layout and furthermore opens up the site through a high degree of pedestrian and car permeability that was achieved by the former hospital use – where pedestrian access was limited for security reasons.

### Character of development and impact on Green Belt

32 As previously stated the plan form of the proposed health care/residential scheme will increase the openness between buildings. The proposals are for a residential development of a largely domestic suburban scale which reduces the massing of development compared to the existing cluster of large institutional buildings with large runs of corridors. Furthermore the maximum height across the development has been reduced.

### Visual impact

33 The applicant has provided a visual analysis of the proposed master plan from Sutton's Lane and strategically on the Green Belt.

34 The retention of the existing former hospital buildings fronting Sutton's Lane means the visual impact from the residential neighbourhood remains unchanged and with the removal of existing corridor run has improve the direct views to the Green Belt. It is accepted that the proposed terraced and semi-detached dwellings sitting behind the retained frontage with enhanced landscaping reduce the built impact and allows for improved open views.

35 The elevated views of the site provided by the applicant illustrate the improvement in permeability achieved by the application proposals, compared to the existing layout of hospital buildings. Where the latter development has limited site permeability truncated by the built form the proposed health care/residential master plan results in through permeability of green spaces and enhanced green edges to the development. There are however parts of the masterplan that should be reviewed to further reduce the visual impact – as set out in the design section of this report.

### **Conclusion**

36 Overall it is accepted that the proposed master plan will not have an adverse impact on the openness and integrity of the Green Belt and will to an extent enhance the setting by the reduced

massing of development and improved landscape setting, but this support is subject to further review of the masterplan. The proposed land use for a health care facility is supported by London Plan policy and provides a modern facility replacing the obsolete buildings on site. The residential use is supported by Havering Council's Core Strategy and development control policies DPD policy DC46, which identifies the site as strategic residential site. London Plan policy supports residential development on brownfield sites and in this instance the case for Green Belt development has been demonstrated. The principle of a new health care facility and residential development of 290 dwellings is supported subject to resolution of all issues raised in this report.

37 However, the scale of development proposal is considered to be the maximum that can be accepted within the context of the NPPF. The footprint and floorspace of the residential development should be secured as maxima by condition.

## **Housing**

38 London Plan Policy 3.3 confirms the pressing need for more homes in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Part B of this policy states that the Mayor will seek to ensure that the housing need identified in paragraphs 3.17 and 3.18 of the London Plan is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London. The 2011 London Plan Consolidated with Alterations increases this projection to 42,389. London Plan Table 3.1 sets a target for Havering Council to deliver a minimum of 1,170 new residential units a year until 2025. The proposed 290 units would make a welcomed contribution to the supply of housing, meeting up to 25% of the annual target.

### Housing mix

London Plan policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social and affordable rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

39 The proposed residential mix in the applicant's planning statement and design & access statement is for the 290 dwellings, but the latter has two figures for housing mix. The first is based on the illustrative masterplan and the second is recommended by its property agent. GLA officers have preference for the property agent advised mix percentages as this allows for a greater number of larger 3 bed+ family units which account for 60% of all residential units.

Table 1: Residential mix & tenure

	Illustrative Masterplan		Property Agent ideal mix	
	Units	%	Units	%
<b>1 bed/2 person apartments</b>	38	<b>13.1</b>	43.5	<b>15</b>
<b>2 bed/4 person apartments</b>	90	<b>31.0</b>	29	<b>10</b>
<b>3 bed/5-6 person apartments</b>	2	<b>0.7</b>	0	<b>0</b>
<b>2 bed/ 4 person houses</b>	35	<b>12.1</b>	58	<b>20</b>
<b>3 bed/ 5 person houses</b>	72	<b>24.8</b>	101.5	<b>35</b>
<b>4 bed/ 6 person houses</b>	42	<b>14.5</b>	43.5	<b>15</b>
<b>5 bed houses/ 7 person</b>	11	<b>3.8</b>	14.5	<b>5</b>
<b>Total</b>	<b>290</b>	<b>44.8</b>	<b>290</b>	<b>100</b>

40 As the applicant has submitted an outline application the housing mix is required to be secured by condition as the Mayor’s powers do not cover subsequent reserved matters applications, the applicant should therefore ensure that housing mix is consistent in documentation and state the final market and affordable housing mix.

#### Affordable housing

41 London Plan policy 3.11 (affordable housing targets) requires borough councils to “seek the maximum amount of affordable housing”. In order to give impetus to a strong and diverse housing sector, 60% of affordable housing provision should be for social rent and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to the provision of affordable family housing.

42 London Plan policy 3.12, as revised, requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes. Negotiations on sites should take account of their individual circumstances including development viability, resources available from registered providers (including public subsidy), the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation (‘contingent obligations’), and other scheme requirements.

43 The Havering Council affordable housing requirement set by its Core Strategy policy CP2 is for 50%.

44 The applicant planning statement sets out an initial affordable housing offer of 10% of all residential units and this is based on claiming Vacant Building Credit as part of the viability assessment. The draft Housing SPG has addressed this new policy and issues arising from its implementation:

*The Government is keen to promote brownfield development and has introduced the vacant building credit policy through a ministerial statement, with guidance in the NPPG. This policy applies to sites where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building. As set out in the NPPG, in these circumstances the developer should be offered a financial credit equivalent to existing gross floor space of when the local planning authority calculates any affordable housing contribution which will be sought.*



*This has particular implications for London, where 98% of development is already delivered on brownfield land in previous uses. The intention of the policy is to provide an incentive for brownfield development on sites containing vacant buildings. To ensure that the credit operates in a way that delivers the intention of the policy, boroughs are encouraged to set out in Local Plan policies when and how the vacant building credit will be applied.*

45 In line with the NPPG and recent revisions to the policy, Havering Council should ensure that the credit is being applied correctly. In addition, Havering Council should be clear that the credit would not be applied to sites with extant or recently expired permission. It is noted that the applicant affordable document was completed before recent refinements to the NPPG and the Vacant Building Credit should be revisited in light of these recent changes to calculating affordable housing provision.

46 The initial 10% affordable housing offer is supported by a viability assessment, this offer is relatively low given the current state of the housing market and a higher provision would be expected. The applicant viability report should therefore be independently assessed on behalf of Havering Council to ensure the maximum is being achieved on-site and the findings shared with GLA officers prior to stage 2 referral.

### Density

47 London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity.

48 The applicant has completed an assessment of density and this estimates the residential development will deliver a scheme of 29 dwellings per hectare, although below the indicative range in Table 3c this density is reasonable given the site's Green Belt location and the suburban nature of the surrounding neighbourhoods.

### **Urban design/heritage**

49 Good design is central to all objectives of the London Plan, in particular the objective to create a city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached whatever their origin, background, age or status. Policies contained within chapter seven specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods by setting out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact.

### **Layout**

50 London Plan Policy 7.1 sets out the requirement for developments to reinforce or enhance the permeability and legibility of neighbourhoods, so that communities can easily access community infrastructure, commercial services and public transport. Furthermore, London Plan Policy 7.3 that sets out a series of overarching principals to ensure that the design of a development should look to reduce the opportunities for criminal behaviour by maximising activity throughout the day and night, clearly articulating public and private spaces, enabling passive surveillance over public spaces and promoting a sense of ownership and respect.

51 The masterplan is based on utilising and expanding the existing hospital road layout and creating a series of urban blocks with predominantly perimeter form development, whilst retaining a frontage to Suttons Lane of retained historic hospital buildings. In response to the Green Belt

location the masterplan has strong emphasis on green spaces (with 96 mature trees retained) which enhance the site's visual and physical permeability.

52 The overall approach to the masterplan is supported but there are specific parts of the where further revision would improve the quality of development and ambiguous definition of streets.

53 The apartment development proposed on the eastern edge of the Green Belt presently offers a car park edge; a landscaped edge would be achieved by reversing the orientation of the building with the gardens facing the Green Belt and the car parking located facing the roads.

54 The south eastern development block requires further revisions to demonstrate the street is fully defined and ambiguous space given ownership; furthermore the gardens just disappear and appear ill defined.

### **Scale, height and massing**

55 London Plan Policy 7.6B sets out the requirement for development to be of a proportion, composition, scale and orientation that enhances activates and appropriately encloses the public realm.

56 The applicant has provided a building heights plan with the buildings having a common height of up to 3 storeys and in three locations 4 storeys. These heights appear reasonable given the suburban nature of the site.

57 The applicant has completed a thorough assessment of massing and scale of the development, together with illustrations of the public spaces and building relationships. Sufficient information has been provided to understand the quality of spaces and the adopted approach is supported subject to refinement of some parts of the masterplan plan.

### **Housing design quality**

58 London Plan policy 3.5 quality and design of housing developments establishes in table 3.3 minimum space standards, which new development need to achieve. The applicant has indicated that 1 bed apartments in admin blocks conversion would be below minimum space standards and is unacceptable. The proposal of all units will be required to be compliant with London Plan table 3.3.

59 The new build apartment buildings in phase 6 and 7 require further detail and should ensure that a maximum of eight units per floor for a single core, all units meeting GLA space standards and entrances should be clearly defined and face onto the street. This guide should also apply to the retained buildings converted to residential use although with some flexibility given the challenges of achieving a viable development. The compliance with London Plan minimum space standards must be secured by condition.

### **Parameter plans**

60 The Mayor's powers do not allow for comment on reserved matters applications which will be used to deliver the masterplan. For this reason a high level of detail is required on outline applications and design quality needs to be secured by parameter plans and design coding/development principles.

61 Whilst it is welcome that the applicant has set out illustrative parameter plans, design guidance for the nine development plots and development principles. These are required to be secured by condition and include within the design code/development principles the following:

- All residential units will be compliant with the residential space standards set out in London Plan table 3.3 minimum space standards for new development.
- The design of residential units should not differentiate between private and affordable housing in terms of appearance.
- A maximum of eight units per floor is required in all apartment development.
- The location and land area for children and young person's play should be set out.
- Details of building materials should be provide such as facing brick, roof treatments and other qualitative guidance.
- That 10% of all residential units are wheelchair accessible and meet the Lifetime Homes requirements (refer to access section).

62 The final parameter plans, plot guidance and design coding/development principles documents should be secured by condition and legal agreement. This should be agreed before stage 2 referral.

### **Heritage**

63 Whilst the loss of the elements of the historic locally listed 1930s hospital, most notably the Dining Hall, boiler house tower and Collier's ward block is regrettable, the retention and conversion of the frontage buildings (Administration Block, flanking Ward and Willows blocks, the gatehouse, Doctor's House and others) is warmly welcomed, as is the construction of a replica second gatehouse matching the existing (conditions are required to ensure a scholarly replica). The demolitions are primarily confined to the middle and rear of the site so the historic and architectural character of the Essex County Council interwar vernacular style hospital when viewed from Suttons Lane will be largely preserved and the new development fronting the existing hospital's retained internal road layout appears well considered.

### **Conclusion**

64 The spatial development approach adopted by the masterplan is supported and sufficient information has been provide to understand the design quality of the scheme, but there are some areas which require further adjustment. As the Mayor's powers do not allow for comment on reserved matters applications the illustrative parameter plans, design guidance for the nine development plots and development principles need to refined so that they can be secured by condition. The applicant is also required to include the additional GLA development principles and finalised parameter plans, plot guidance and design coding/development principles should be agreed before stage 2 – together with appropriately worded condition.

### **Children & young person's play**

65 Children and young people need free, inclusive and accessible spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan seeks to ensure that all children and young people have access to such provision. The challenge facing boroughs and their partners in play provision will be to find

opportunities to retain and increase the provision of play and informal recreation, particularly in housing developments.

66 The applicant has not provided a play strategy or completed an assessment of child yield using the *Mayor's Shaping Neighbourhoods: Play and Recreation SPG (2012)*. The applicant should undertake this calculation work and the findings should relate to its play space strategy. The applicant should indicate the location of children's play space for Door step playable space (0-5 years), Youth space (12+ years), Local playable space (0-11 years) and Neighbourhood playable space. The area of these spaces needs to be identified and secured by condition or within the design parameter plans. This work should be completed before stage 2 referral.

## **Access**

67 Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum).

68 Whilst it is understood that this is an outline application there is an issue of securing inclusive access through future reserved matters applications. The applicant should provide assurance over the following issues:

- The parameter plan should indicate the site levels and how easy access is secured across the site and at all crossing and transition points and proposed linkages to and from the development site area.
- The applicant should secure in the development principles that Blue Badge parking spaces for residents and visitors should be located as close as possible to residential entrances.
- The applicant should in the development principles and by condition that 100% of new homes will meet the Lifetime Homes standards. At least 10% of all homes should also be designed to be wheelchair accessible or easily adaptable for occupation by a wheelchair user.
- The development principles should secure that the wheelchair homes are distributed across tenure types and flat sizes to give disabled and older people similar choices to non-disabled people. For the apartment blocks wheelchair accessible flats are to be served by two lifts not one should be secured, so that level access can be maintained if maintenance or repair work is being carried out on one of the lifts.
- Not to submit the first Reserved Matters Application for any Phase of the Development without first submitting and obtaining the LPA's approval to the Inclusive Access Strategy and the Wayfinding Strategy and submitted to the LPA for approval. The Reserved Matters Applications shall ensure that the Development is designed, delivered and managed in accordance with the Inclusive Access Strategy and the Wayfinding Strategy. Reason To ensure that the Development is designed, delivered and managed to a high standard of inclusive access and legibility of routes and that it reflects such high standards as they evolve during the construction phase of the Development.
- The Planning Conditions define the "Inclusive Access Strategy" as the site wide strategy to be submitted and approved in accordance with the above Condition of this Permission and which shall be prepared by the Developers in consultation with the borough to achieve inclusive access and mobility across the scheme. The strategy should set out the vision and

establish appropriate mechanisms and inclusive access design standards for ensuring inclusive design is integrated into the regeneration from the beginning of the design process and which designers abide by. The strategy should include design standards for Accessible Wayfinding Information and Interpretation to be incorporated within the public realm to assist visitors to the site.

## **Sustainable development**

### **Energy**

69 The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

70 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting.

71 The development also includes refurbishment to a number of existing dwellings. The applicant has stated that the services will be upgraded to Part L 2013 standards and that the potential for the fabric to be improved will also be investigated, this is welcomed.

72 The applicant should provide evidence of how Policy 5.9 has been addressed to avoid overheating and minimise cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended at the detailed design stage. The development is estimated to achieve a reduction of 11 tonnes per annum (2%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development.

73 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. But has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

74 A site wide heat network is currently not proposed due to the low density of the development with the majority houses. The preferred option for the development is individual boilers. However, the applicant has stated that CHP will be evaluated at detailed design during the reserved matters application, this is welcomed.

75 As the site is situated in a district heating opportunity area the application should contact the local energy officer to ascertain whether there are any networks coming forward in the near future. The applicant should also commit to a centralised system for each of the apartment buildings and ensure the plant rooms are designed to connect to district heating in the future should one become available. The healthcare heating system should also be designed for a future connection.

76 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is currently not proposed. However, this will be reviewed by the applicant at reserved matters stage when more detailed information is available.

77 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 1,450 sq.m. of Photovoltaic (PV) on the roofs of the development. A reduction in regulated carbon dioxide emissions of 195 tonnes per annum (34%) will be achieved

through this third element of the energy hierarchy. The carbon reduction reported appears to be high for 1,450 sq.m. of PV panels. The applicant should therefore review the PV calculation to ensure that they are correct and update the figures where necessary. The PV calculation should be provided to support the savings claimed.

78 The applicant should also check the reduction figures outlined in Table 32 as they do not appear to correlate with the emissions presented in Tables 31 & 32.

79 The applicant energy strategy results in a reduction of 195 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan however the comments above should be addressed before compliance with London Plan energy policy can be verified.

#### Recommended conditions / section 106 clauses

80 As this is outline application there is a need to ensure that there is a condition for an energy statement to be produced at reserved matters with the following requirements:

*The development shall achieve at least a 35 per cent carbon reduction against a Part L 2013 baseline, and both domestic and non-domestic elements of the development shall be designed to meet Part L 2013 carbon emission target through fabric energy efficiency measures alone.*

#### **Flood risk/sustainable drainage**

81 The site is within Flood Zone 1 as confirmed in a Flood Risk Assessment (FRA) undertaken by Peter Brett. The Ingrebourne River is situated a short distance to the east of the site and has a history of flooding near this location, but not affecting the site. The FRA confirms that there are some small areas of surface water flood risk within the site and that new buildings will have floor levels set above the likely flood levels. Therefore the proposals are acceptable in principle in terms of London Plan Policy 5.12.

82 The FRA states that an 80% reduction in surface water discharge from the site will be achieved through a combination of techniques:

- 582m<sup>3</sup> of modular storage underneath car parking areas of the health facility
- 4206m<sup>3</sup> of storage for the residential element of the site using attenuation basins, swales and ponds, possibly supplemented by underground storage and the application of plot level measures such as green roofs, permeable paving, rainwater gardens, rainwater harvesting.

83 The exact nature of the drainage proposals will be determined at a more detailed stage. However, the principle of the strategy is considered to comply with London Plan Policy 5.13 and should be secured via an appropriate planning condition with detailed agreed with Havering Council Drainage Dept.

#### **Transport**

84 The London Plan has now been adopted and therefore the level of cycle parking should be increased to accord with this latest policy. This requires all studio and 1 bed units to be provided with a minimum of 1 cycle storage place and all 2+ bed units to be provided with a minimum of 2 spaces. This application still proposes 1 space for 2 bed units. The final provision should be secured through a condition which also includes details of the location of cycle storage facilities, as they have not been provided as part of this application.

85 The Transport Assessment submitted with this application does not provide trip generation data for bus journeys. TfL is concerned about the impacts of this proposal on the local bus network and requires further trip information in order to identify if any capacity issues will be likely as a result, and if so contributions towards enhancements will be required.

86 Furthermore, TfL requests an assessment of local bus stops to be undertaken by the applicant and a S106 contribution made to their improvement if they do not comply with TfL's Accessible Bus Stop design guidance (available at: <http://www.tfl.gov.uk/cdn/static/cms/documents/accessible-bus-stop-design-guidance.pdf>).

87 TfL is also concerned about the level of parking proposed within this development. 490 spaces is considered likely to be out of accordance with the London Plan however no plan detailing how these spaces will be allocated has been provided. A plan should be provided showing how these spaces are to be allocated, in-keeping with, and making reference to the London Plan.

88 TfL supports the development in principle but seeks the above issues to be addressed as the application progresses.

### **Local planning authority's position**

89 Not known at the time of drafting the report.

### **Legal considerations**

90 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; or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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.

91 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**

92 There are no financial considerations at this stage.

### **Conclusion**

93 London Plan policies on Green Belt/MOL, housing mix, affordable housing, urban design & heritage, children & young person's play, access, energy, flood risk & sustainable drainage, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Green Belt/MOL:** Overall it is accepted that the proposed master plan will not have an adverse impact on the openness and integrity of the Green Belt and will to an extent enhance the setting by the reduced massing of development and improved landscape

setting. The proposed land use for provision of a health care facility and residential use is supported, subject to further review of the masterplan and assurance of the securing design quality. However, the footprint and floorspace should be secured as maxima.

- **Housing mix:** GLA officers have preference for the property agent advised mix percentages as this allows for a greater number of larger 3 bed+ family units which account for 60% of all residential units. As the applicant has submitted an outline application the housing mix is required to be secured by condition
- **Affordable housing:** The initial 10% affordable housing offer is supported by a viability assessment, this offer is relatively low given the current state of the housing market and a higher provision would be expected. The applicant viability report should therefore be independently assessed on behalf of Havering Council to ensure the maximum is being achieved on-site and the findings shared with GLA officers prior to stage 2 referral.
- **Design & heritage:** The spatial development approach adopted by the masterplan is supported and sufficient information has been provide to understand the design quality of the scheme, but there are some areas which require further adjustment. As the Mayor's powers do not allow for comment on reserved matters applications the illustrative parameter plans, design guidance for the nine development plots and development principles need to refined so that they can be secured by condition. The applicant is also required to include the additional GLA development principles and finalised parameter plans, plot guidance and design coding/development principles should be agreed before stage 2 – together with appropriately worded condition.
- **Children & young person's play:** The applicant has not provided a play strategy or completed as assessment of child yield using the Mayor's *Shaping Neighbourhoods: Play and Recreation SPG (2012)*. The applicant should undertake this calculation work and the findings should relate to its play space strategy.
- **Access:** The applicant should respond to the requested information and ensure inclusive access principles are secured by condition.
- **Climate change mitigation:** The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan however the comments above should be addressed before compliance with London Plan energy policy can be verified. The applicant/ Havering Council should include the required condition in the consent documentation.
- **Transport:** TfL supports the development in principle but seeks the issues highlighted in this report are addressed before stage 2 referral.

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