The Royal National Orthopaedic Hospital, Stanmore
in the London Borough of Harrow
planning application no P/ 3191/ 12

### Strategic planning application stage I referral (new powers)


### The proposal

Hybrid application for the comprehensive, phased, redevelopment of the Royal National Orthopaedic Hospital. The redevelopment will consist of:

**Outline Element:** To include up to 56,871sqm (gifa) of new hospital (Use Class C2), including rehabilitation unit and parent accommodation; up to 21,000 sq. m. (gifa) multi storey car park providing up to 805 car parking spaces; up to an additional 88 surface and 50 undercroft car parking spaces for operational hospital use; up to 40,260 sq. m. (gifa) of residential development (Use Class C3) (including ancillary floorspace i.e. garages and undercroft parking) providing up to 356 (347 net) residential units of which up to 45 units will be for staff accommodation (36 proposed and 9 existing); partial change of use of Eastgate House from office to private residential (Use Class C3); up to 19.2 hectares of public open space; associated landscaping and ancillary works and closure of existing access at north-eastern end of Wood Lane.

**Detailed Element:** Demolition of four structures; realignment and alterations to the existing service road and access from Wood Lane; provision of a new internal road and a new internal access point to the Aspire National 5 Training Centre (associated with the hospital health use); provision of a total of 75 car parking spaces for the Aspire National Training Centre and associated lighting, drainage and landscape works. Temporary permission (5 years) for construction of an area of hard standing to accommodate 121 car parking spaces, erection of a 3m high fence to enclose the existing boiler house, works to the existing estates compound; associated lighting, drainage and landscape works.

### The applicant

The applicant is Royal National Orthopaedic Hospital and the agent is Drivas Jonas Deloitte

### Strategic issues

The principle to deliver a bespoke re-provision of a nationally significant hospital facility and enabling residential development on an existing hospital site within the Green Belt is acceptable. in strategic terms; however, further information and revisions with regard to **housing, children’s play space, urban design, inclusive access, trees, sustainable development** and transport.
Recommendation

That Harrow Council be advised that the application, on balance, does not yet fully comply with the London Plan for the reasons set out in paragraph 142 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

Context

1. On 11 February 2013 the Mayor of London received documents from Harrow 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 25 March 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 the following Categories of the Schedule to the Order 2008, as follows:

- Category 1A “Development which comprises or includes the provision of 150 houses, flats, or houses and flats”.
- Category 1B (c) “Development which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”
- Category 3D (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.”
- Category 3F “Development for a use other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use”

3. Once Harrow 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; take it over for his own determination; or allow the Council to determine it itself.

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. The Royal National Orthopaedic Hospital (RNOH) is the largest orthopaedic hospital in the UK, and is regarded as a leader in the field of orthopaedics both in the UK and world-wide. Whilst the RNOH Stanmore is a centre of excellence, it is widely recognised that the existing site does not meet the current and future operational demands of service provision and patient care with many buildings being sub standard. For example, 60% of the site’s current buildings are over 60 years old and are deemed to be no longer suitable for the delivery of high quality health care.
The site occupies an area of 41.44 hectares and is located approximately 1.3 miles to the north of Stanmore centre and 9 miles to the south of St Albans in an area predominantly dominated by countryside and farmland.

The location of the site is bounded by agricultural land to the north, Brockley Hill (the A5) to the east, Warren Lane and open space to the south and residential accommodation to the west.

Land uses within the site comprise a range of hospital buildings and key worker housing (predominantly of post-war construction), car parking and open space. The open space within the site comprises open grassland, scrub, orchard, woodland, scattered agricultural fields and trees, all of which are subject to a Tree Preservation Order (TPO).

The site is located within the Green Belt on the northern edge of the Harrow Weald Ridge, an Area of Special Character and is considered to be important in terms of the character, appearance and history of London. As well as this, part of the site lies within a Site of Nature Conservation Importance (SNCI); a non-statutory designation for an area comprising flora and fauna of Greater London and part of the site is designated as a Site of Metropolitan Importance. The site forms part of green corridor, important for the movement of wildlife and is part of the London Outer Orbital Path (LOOP), a large circular route around London, which runs along a public footpath in the western part of the site. The site is also adjacent to Little Common Conservation Area, Brockley Hill Farm House (grade II listed) and there is a Scheduled Ancient Monument located within the site itself.

Other than its Green Belt setting, the single most important element of the site is its topography. There are very significant changes in the levels across the site and although there are many local variations, the general topography has a pronounced fall from south to north, amounting to as much as 20 metres from the Wood Lane boundary to the northern edge abutting the adjacent farmland.

The area is well serviced by major trunk roads with Junction 4 of the M1 approximately 0.5 miles to the north and J21 of the M25 approximately 10 miles to the north west of the site. Stanmore Underground station is 1.3 miles to the south that provides links into central London on the Jubilee line. Elstree and Borehamwood Train Station, which provides direct services to St. Albans and Luton Airport to the north and London St. Pancras in 25 minutes, is two miles to the north east. A number of buses serve the site including Route 107 (Edgware - Borehamwood) serving Brockley Hill but not Stanmore station. The NHS operates a shuttle bus three times per hour, which connects the site to Edgware and Stanmore stations. A new bus service (Route 615) operated by the Herefordshire based private operator UNO is also serving the site at Wood Lane since summer 2012. The site records a very low public transport accessibility level (PTAL score) of 1a, on a scale of 1a to 6b, where 6b is excellent.

Locally, the site is designated as a major developed site in the Green Belt, in the Saved UDP and is designated as a strategic and previously developed site in the Green Belt as set out in Harrow’s Core Planning Strategy and the pre submission Site Allocations DPD (2012).

It should be noted that the pre submission Site Allocations DPD states that ‘Redevelopment of the site offers the potential to provide a modern, fit for purpose accommodation that befits the hospital’s status and to improve the openness of the site by rationalising the existing complex of buildings. The desirability of providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for some enabling development that would otherwise be inappropriate development in the Green Belt. The site and its surroundings include features of archaeological, biodiversity and heritage importance which must be safeguarded from the impacts of development.’
A site visit was carried out by the GLA case officer on the 4 September 2012.

**Details of the proposal**

The applicant is proposing to deliver a hybrid application to deliver a new purpose built hospital which will include associated services including an accommodation unit for the families of children being treated at the RNOH, a new rehabilitation centre, and other ancillary clinical and service related development. To enable the development of a replacement hospital the applicant is proposing residential development. The indicative masterplan can be seen in figure one below.

![Figure one: Proposed indicative masterplan](image)

In total the development comprises the following elements:

- Replacement ‘fit for purpose’ hospital and associated services
- Up to 356 private residential units
- Two new blocks of staff accommodation providing 36 units;
- A 6 storey multi-storey car park providing 805 spaces (21,000 sq. m.), and surface car parking to provide an additional 320 car parking spaces; and
- surface car parking to provide 138 car parking spaces and 455 residential car parking spaces
- Provision of both private and publically accessible open space (approximately 19 hectares)

The applicant proposes that the application will comprise four distinct zones; the Central Development Zone (CDZ) will contain the proposed hospital development; the Eastern Development Zone (EDZ) and Western Development Zone (WDZ) will contain the residential
development and the Northern Amenity Zone (NAZ) will provide an area of open space to be made available to the public, whilst remaining under the ownership of the hospital. The only works being undertaken within the NAZ will be for landscape improvement or ecological enhancement. The indicative masterplan can be seen in figure overleaf.

18 The application will allow for the phased delivery of the hospital and residential elements of the development. All matters of access, layout, landscaping, scale and appearance for each phase of the development will be reserved for determination at a later date.

19 The hospital development is expected to take place over a 15 year period, and its phasing is a critical issue; the planned disposal of the two residential development parcels (in the Western and Eastern Development Zones) is timed to coincide with the delivery of key stages in the hospital project works, with the associated income constituting a crucial element of Trust’s overall business plan.

20 A full breakdown of proposed floorspaces and residential mix is given later in this report.

Case history

21 On 13 September 2012 a pre-planning application meeting was held at City Hall and a pre application advice report was issued to the applicant. This report concluded that at that time further discussion was needed with regards to the residential quantum proposed, impact on the openness of the Green Belt and further discussion was requested relating to the enabling development and the scheme’s ‘very special circumstances’ justification.

22 Revisions were required with regards to urban design and inclusive access and further information was needed with regards to housing mix, affordable housing, children’s play space, climate change and mitigation.

Planning History

23 An outline planning permission for the “partial redevelopment to provide new hospital and associated facilities, housing (including staff), revised road junction, car parking and open space.” was considered by the previous Mayor at stage two on the 20 January 2006 (PDU ref: PDU/ 0960a), where it was concluded that the provision of affordable housing at 32% was acceptable given that elements of the masterplan and new hospital would have not been secured by the PFI process and the likely shortfall in funding; and recognition of the increase in staff accommodation. It was also noted that given the strategic nature of the application, Harrow Council should consult the Mayor on reserved matters application for design and external appearance as well as future housing applications. Planning permission was granted for this scheme in 2007.

24 Due to the RNOH Trust being unable to secure the necessary funding from Central Government to bring this development forward, the extant outline consent remained unimplemented and expired on 15 January 2010.

25 The proposal for the extension to the time limit for implementing the above outline planning permission was referred to the Mayor on 1 February 2010 (PDU ref:0960b) and the application did not raise any new strategic planning issues. This application was subsequently granted planning permission on 4th June 2010 (ref. P/ 0083/ 10), thereby extending the life of the outline planning permission for a further five years (hereafter referred to as the extant planning permission) until 4 June 2015.
The applicant has now stated that the above extant planning consent no longer meets the requirements of the Trust and its aspirations to modernise the RNOH facilities, which will need to be part funded by enabling residential development. The Trust is now seeking consent for redevelopment of the site in the form of a hybrid planning application.

In addition, a separate application has been made for ‘Task 1 Works’, which are inherently linked to this hybrid planning application, but need to begin earlier than the enabling works included in the hybrid application. The Task 1 Works application sought consent for ‘the laying of service ducts within the CDZ; and, the removal of a number of trees allowing for the construction of a new western service road and temporary car park (part of the detailed element of the hybrid application). The application was granted by the Council on 28 January 2013.

**Strategic planning issues and relevant policies and guidance**

28 The relevant issues and corresponding policies are as follows:

- **Principle of development**: London Plan
- **Green Belt/ MOL**: London Plan
- **Health**: London Plan
- **Housing**: London Plan; 2012 Housing SPG; draft Revised Housing Strategy; Providing for Children and Young People’s Play and Informal Recreation SPG;
- **Affordable housing**: London Plan; 2012 Housing SPG; Housing Strategy; draft Revised Housing Strategy
- **Density**: London Plan; 2012 Housing SPG
- **Urban design**: London Plan;
- **Historic Environment**: London Plan
- **Access**: London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- **Air quality**: London Plan; the Mayor’s Air Quality Strategy;
- **Trees/ Biodiversity**: London Plan
- **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
- **Parking**: London Plan; the Mayor’s Transport Strategy

29 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 2012 Harrow Core Strategy, the 2004 Unitary Development Plan ‘saved policies’ and the 2011 London Plan.

30 The following are also relevant material considerations:

- The draft Revised Early Minor Alteration to the London Plan (2012)
- Harrow Pre Submission Site Allocations DPD (2012)
- Harrow Pre Submission Development Management DPD
Principle of Development

Green Belt

31 As set out in paragraph 9 of this report, the site falls within the 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”

32 This follows policy guidance of paragraphs 79-92 of the National Planning Policy Framework (NPPF) which relate to Green Belts and their protection.

33 In particular, paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances; paragraph 88 makes it clear that ‘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.’

34 Notwithstanding the above, paragraph 89 of the NPPF lists exceptions to this including ‘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.’

35 As set out in paragraph 12 of this report, the RNOH site is designated as a major developed (previously developed) site in the Green Belt, as classified by the Saved UDP and is designated as a strategic and previously developed site in the Green Belt as set out in Harrow’s Core Planning Strategy (designation which flowed from guidance in PPG2), which is also set out in the Council’s pre submission Site Allocations DPD. Therefore development on this site can be seen as an exemption, provided that there is no impact on the openness and function of the Green Belt.

36 The NPPF does not give any further guidance on how to assess impact on openness but based on previous guidance it would be appropriate to take account of footprint, floorspace, spread of development, areas of hardstanding, height and visual impact.

37 Table overleaf sets out the existing and proposed figures of both building footprint and floorspace; for comparison the table also sets out the figures related to the extant permission of the RNOH site.
### Table One: Breakdown of footprint and floorspaces.

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Footprint sq. m. GEA / (Floorspace (GIA))</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Existing Built Development</td>
</tr>
<tr>
<td>Healthy clinical related use</td>
<td>34,778 (42,444)</td>
</tr>
<tr>
<td>Residential: Staff accommodation</td>
<td>2,492 (4,410)</td>
</tr>
<tr>
<td>Residential/ homes</td>
<td>0</td>
</tr>
<tr>
<td>Multi storey car park</td>
<td>0</td>
</tr>
<tr>
<td>Totals</td>
<td>37,270 (46,584)</td>
</tr>
</tbody>
</table>

38 The proposals will be creating a new fit for purpose orthopaedic hospital, focussed onto a reduced footprint, enabling the NHS Trust to release existing footprint of current hospital operational areas to be used for the enabling residential development. Although redistributed, the approach taken maintains the overall spread of development on the RNOH site and as demonstrated in table one, although there is an overall increase of floorspace proposed, there is no net increase in development footprint. This approach also helps to minimises the impact of development on the Green Belt in terms of its openness and its function.

39 As part of the submission the applicant has submitted a Green Belt position statement document which assesses the development in terms of the seven openness criteria identified in Policy 23 of the Council’s emerging Development Management DPD. The applicant has also demonstrated how the design approach taken has minimised impact of openness on the Green Belt, for example all buildings remain within the existing height parameters of buildings currently located on the RNOH site. Further consideration of the schemes impact on the openness of the Green Belt is contained in the urban design section of this report.

40 In addition to the above, it is acknowledged that the RNOH is a previously developed site in the Green Belt and that the hospital is in urgent need of reinvestment and redevelopment. It is also acknowledged that the principle of development in this case is underpinned by the extant permission, which is a material consideration and therefore the principle of development in this instance is accepted.

### Summary

41 The development proposals will be delivering a bespoke re-provision of a nationally significant hospital facility of world-renowned reputation; given this and given the factors above, notably the designation of the site as a previously developed site, the maintained level of existing development footprint, and justification by the applicant that there will be no greater impact on the openness of the Green Belt, on balance the principle of development is acceptable.

### Residential use/ enabling development

42 As already stated, the application site falls within an area of designated Green Belt and is designated as a previously developed site; the existing hospital complex is spread over a substantial
site area and occupies many outdated, substandard buildings. The total building footprint figure is set out in table one in this report.

43 In order to bridge the funding gap to deliver a new hospital, the applicant is proposing to develop up to 92 private residential units (including up to 54 houses and 38 apartments) within the western development zone (WDZ) and up to 219 private residential units (including up to 9 houses and 210 apartments), up to 36 new key worker staff accommodation units within the eastern development zone of the site (EDZ) as enabling development.

44 Residential development as proposed within the Green Belt is regarded as inappropriate development; however, the applicant considers that the enabling development needed to deliver the new hospital is regarded as ‘very special circumstances’ where development would be permitted.

45 Paragraph 88 of 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. ‘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.

46 This is a finely balanced issue, concerning the character and qualities of the Green Belt against the need to secure the future funding and therefore delivery of the new hospital. Enabling development will by definition involve a scheme, which would otherwise be unacceptable in planning terms but is the only practicable means of generating the funds needed to secure the future of the hospital use in question. It should also be the minimum amount of development required to generate the funds needed.

47 In terms of demonstrating ‘very special circumstances’ for enabling development the applicant has provided relevant and robust information (including a confidential viability report) which clearly indicates that the residential element component is essential to ensure the future of the hospital: the receipts generated from the sale of this land, with residential permission, will directly cross-subsidise the funding of the new hospital development. It has also been demonstrated that the proposed unit quantum is indeed the minimum development needed to deliver the new hospital uses and therefore the delivery of 356 homes on Green Belt in this exceptional circumstance is accepted strategically. However, whilst recognising the special circumstances of this public use and funding arrangement for the health related development, in order to satisfy policy tests of the London Plan, the applicant’s viability work which has been submitted will need to be independently assessed before the scheme is referred back to the Mayor at stage two.

Health use

48 London Plan policy 3.17 supports the provision of high quality health care; also in line with this policy, the applicant will need to take into account the mayor’s Best Practice Guidance on Health Issues in Planning.

49 The application will include an increase of 18,954 sq. m. floorspace for an exemplary new hospital provision. Within the context of paragraphs 31 to 41 of this report, the re-provision of health use to develop an exemplary hospital is fully accepted and supported in strategic terms.

Other proposed uses – multi storey car park

50 The applicant has explained that currently there is a major issue regarding parking on site; there are insufficient spaces for patients, staff and visitors which causes vehicles to be parked in all areas of the site unofficially. This was also particularly noted during a site visit undertaken by GLA
officers. As part of the successful operational use of a new hospital, there needs to be a re-provision of car parking and as such the applicant is proposing a 6 storey multi storey car park on site in addition to some surface parking. It is acknowledged that provision of adequate parking spaces would stop the high level of unauthorised parking currently undertaken on site and would have a positive visual impact on the site and its Green Belt context.

51 In addition to this the applicant has demonstrates that the multi storey car park is within existing height parameters currently on site and that this element of the scheme will not have a detrimental impact on the Green Belt and its openness. The provision of a car park on this site is therefore acceptable.

**Housing**

52 London Plan Policy 3.3 seeks to increase London’s supply of housing and in doing so sets a London-wide housing delivery target of 32,210 additional homes per year up to 2021. Table 3.1 sets borough housing targets, of which Harrow’s is 350 additional homes per year between 2011 and 2021. The scheme, in total will deliver up to 356 residential units and within the context of paragraphs 31 and 47 of this report, the delivery of housing in this regard is acceptable.

**Staff accommodation**

53 Currently on site there are 65 staff accommodation units (some of which is shared accommodation) on site providing accommodation for up to 110 hospital staff. Some of the accommodation is out-dated due to a significant backlog of maintenance repairs and therefore is not fit for purpose. There are 98 hospital staff currently living in the accommodation. The NHS Trust requires replacement staff accommodation as part of the development proposals for recruitment and retention purposes and, therefore the proposed development will include 36 new affordable units and 9 of the existing provision will be retained, providing accommodation for up to 82 tenants; this equates to a net loss of 20 units and a net loss of 28 tenant spaces.

54 London Plan policy 3.14 states that the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need will not be supported unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

55 In terms of actual floorspace the net loss of affordable staff accommodation will be 260 sq. m. whilst the principle of re-provision of floorspace can be accepted within Green Belt policy, the relatively small net loss of such provision conflicts with London Plan policy.

56 In order to justify this small loss, the applicant has assessed the staff accommodation need in terms of quantum and mix. Work undertaken to do this has included a staff/tenant survey and results conclude that the proposed new level of provision put forward is suitable and will adequately serve future requirements of staff and the Trust. In addition to this, it is important to note that the viability work submitted by the applicant, demonstrates that any additional provision would render delivery of the important first phase of the hospital unviable; as such, on balance, the loss of staff accommodation is accepted in this instance, subject to independent assessment of the applicants viability work.

**Affordable housing and tenure split**

57 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. This target should take account of the requirements of London Plan policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale.
Whilst it is acknowledged that the scheme will be delivering an element of affordable housing through the re-provision of staff accommodation which will meet a particular housing need, London Plan policy 3.8 makes it clear that developments should provide for a range of housing types, take into account housing requirement of different groups and that priority should be given to the provision of affordable family housing to address the particular need of affordable family homes. In addition, policy 3.9 seeks to promote mixed and balanced communities and specifically.

This scheme is unique in that the private residential development will be enabling development; the land receipt secured from the sale of land which benefits from outline planning permission for residential development will contribute towards the much needed delivery of the new exemplary hospital facilities, which is the overriding planning benefit.

In line with London Plan policy 3.12 the applicant has submitted a confidential viability report which assesses the level of affordable housing that could be accommodated on site and it included consideration of values from the sale of surplus land to subsidise the new hospital development.

The viability report tests three options, (A) 40% of total units across the site spread evenly between the WDZ and the EDZ, (B) 40% of total units, but provided solely on the EDZ (55%) with nil affordable on the WDZ and (C) 10% (of total units) affordable, but provided as staff accommodation and provided solely within the EDZ. The report demonstrates that a residential scheme for the WDZ and EDZ which is compliant with the Council’s affordable housing policy (assumed at 40%) will not generate sufficient land values, and thereby threaten delivery of the PFI Phase (Phase 2) and the new outpatients and estates department (Phase 7) of the hospital redevelopment. In conclusion, the report states that no more than 10% of total units (as identified in option C) can be provided, by the applicant, which will comprise the staff accommodation element of the development.

Given the priority in this instance to deliver a new bespoke specialist health facility, the figures contained in the viability report and the case for hospital staff accommodation to be the only affordable offer is accepted; however, in order to satisfy policy requirements, the financial viability report will need to be independently assessed in accordance with London Plan Policy 3.12 before the scheme is referred back to the Mayor at stage two.

Mix of units

As part of the outline consent, an illustrative masterplan for each zone is submitted as part of the application to demonstrate how the proposed parameters could be accommodated on the site and therefore the applicant is not seeking consent for a specific mix of residential units; although at this stage an indicative mix for the private housing has been put forward as follows:

Western Development Zone:

<table>
<thead>
<tr>
<th>Unit size (bedroom)</th>
<th>Houses</th>
<th>Apartments</th>
<th>Totals (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0</td>
<td>4</td>
<td>4 (4)</td>
</tr>
<tr>
<td>2</td>
<td>0</td>
<td>18</td>
<td>18 (19)</td>
</tr>
<tr>
<td>3</td>
<td>13</td>
<td>16</td>
<td>31 (33)</td>
</tr>
<tr>
<td>4</td>
<td>29</td>
<td>0</td>
<td>29 (31)</td>
</tr>
</tbody>
</table>
Table two: Indicative residential mix - Western Development Zone

Eastern Development Zone (excluding staff accommodation)

<table>
<thead>
<tr>
<th>Unit size (bedroom)</th>
<th>Houses</th>
<th>Apartments</th>
<th>Totals (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>0</td>
<td>59</td>
<td>59 (27)</td>
</tr>
<tr>
<td>2</td>
<td>0</td>
<td>100</td>
<td>100 (46)</td>
</tr>
<tr>
<td>3</td>
<td>0</td>
<td>48</td>
<td>48 (22)</td>
</tr>
<tr>
<td>4</td>
<td>9</td>
<td>3</td>
<td>12 (5)</td>
</tr>
<tr>
<td>Totals</td>
<td>9</td>
<td>210</td>
<td>219</td>
</tr>
</tbody>
</table>

Table three: Indicative residential mix – Eastern Development Zone

64 The indicative mix for the affordable accommodation has also been given as seen below (excluding 9 existing units to be retained):

<table>
<thead>
<tr>
<th>Unit size (bedroom)</th>
<th>Apartments (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>9 (25)</td>
</tr>
<tr>
<td>2</td>
<td>18 (50)</td>
</tr>
<tr>
<td>3</td>
<td>3 (8)</td>
</tr>
<tr>
<td>3 (family unit)</td>
<td>6 (17)</td>
</tr>
<tr>
<td>Totals</td>
<td>36</td>
</tr>
</tbody>
</table>

Table four: Indicative residential mix – affordable staff accommodation

65 The general indicative mix put forward for the private residential element of the scheme seems reasonable for this outer London location and the Council will need to be satisfied with the mix put forward.

66 The indicative unit mix shows that the housing mix for the masterplan overall will provide for 40% family units (3 bed plus) which is acceptable for a development in this location. Based on the above figures, within the affordable provision the percentage of family housing delivered will be 17%. In addition to this, the applicant has not submitted any details of the unit mix of the 9 existing affordable staff units (Orchard House) which are to be retained. Clarity of these figures, justification of the 17% family provision put forward and how this meets the hospitals needs will be needed before the scheme is referred back at stage two.
67 As the mix is indicative, the Council will need to secure appropriate planning conditions relating to the quantum of affordable family units to be provided as detailed stages of the development come forward.

**Residential quality**

68 The applicant has stated that all residential units throughout the scheme will need to be designed to comply with and where possible exceed the Mayor’s Housing SPG and Lifetime Homes standards, in particular, the design and access statement submitted illustrates that all units will be dual aspect; this is particularly supported and welcomed. The housing typologies proposed are likely to meet most of these standards, but this will need to be secured via planning condition by the Council.

69 Along with this, given the hybrid nature of the scheme, the Council will need to secure other aspects of residential quality through planning conditions; as a minimum the space standards set out in Table 3.3 of the London Plan should be secured in this manner so that the scheme accords to London Plan policy 3.5.

**Density**

70 As stated in paragraph 11, the site has a public transport accessibility level (PTAL) of one and has characteristics of a suburban setting, as defined by the London Plan and therefore has a density range of 150 - 200 h/ha (between 33 and 75 units per hectare).

71 The applicant has indicated that the residential density will range from 12.3 to 47 u/ha, this density is lower than normally would be expected; however, given the site’s Green Belt context, the density in this instance is acceptable.

**Children’s play space**

72 Using the methodology within the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’ (2012) it is anticipated that there will be approximately 135 children within the development. In line with SPG guidance, in total, the scheme should deliver 1354.5 sq.m of children’s play space, of which 700 sq. m. should be provided on site for the under 5’s provision. These calculations are based on indicative figures given by the applicant and do not take into account the 9 existing staff units which will be retained. Details of the retained units will be needed to update this figure before stage two.

73 Notwithstanding this, the applicant is proposing to provide 1,970sq.m of play space (1,270sq.m for the EDZ and 700sq.m for the WDZ). In accordance with London Plan policy 3.6 and guidance set out in the Mayor’s Providing for Children and Young People’s Play and Informal Recreation SPG, the applicant will need to submit a play strategy before the scheme is referred back to the Mayor at stage two giving clear indication of child space provision for each age group across the masterplan.

74 Any provision of play space will also need to be secured accordingly by the Council to ensure that the provision of child play space meets the need generate of the housing mix once known at detailed stage in line with policy 3.6.

**Urban design**
75 As set out in paragraph 15 of this report, the application has been submitted in a hybrid format, with the majority of the development in outline format. The parameter plans and design guidelines submitted with the application set the design ‘rules’ for the detailed design of the later outline phases, which includes enabling residential development on the Green Belt and therefore, the Mayor will need to be satisfied that the level of information provided by the applicant provides an adequate framework to inform future detailed phases in line with policies contained in chapter seven of the London Plan. While doing so, this information will also need to satisfy the need to demonstrate that there will be no impact on the character or the openness of the Green Belt in line with London Plan policy 7.16.

76 The applicant is proposing three separate ‘development’ zones, with north/south green corridors between them which all continue to a fourth ‘northern amenity zone’, containing 19.21 hectares of publically accessible open space. This proposed masterplan layout also responds to the site’s unique topography (the site drops significantly in level from north to south) and landscape which is welcomed.

77 It is clear that the position of all hospital facilities within the central development zone (CDZ) has been informed by the main north/south view through the site as well as the objective of the hospital operational efficiencies, which is also is welcomed. The parameters of the hospital design will limit the height and footprint of the building, and this is supported. The compact layout and massing of the hospital will provide the level of floorspace required for the facility while minimising the impact of the buildings, by responding to the downward slope and the proposed crescent shape seems to be a useful way of taking advantage of potential landscape views.

78 The overall layout of the scheme is particularly welcomed as it allows the continuity of the green infrastructure through the site and avoids the creation of a contiguous developed urban area and therefore has least impact on the openness and character of the Green Belt.

79 In addition, the applicant has provided some vistas and views; the significant changes in level of the site mean that the development will be visually prominent in the wider landscape, however with further proposed landscaping and design approach taken the applicant has demonstrated that there would be no detrimental harm to the openness of the Green Belt or the character of the northern edge of the Harrow Weald Ridge (an Area of Special Character).

80 To further reiterate that this is indeed the case, further information in the form of long distance views illustrating the overall massing for the development from the north, from the M1, Brockley Hill and Elstreet Road will need to be provided by the applicant.

81 The sensitive location of the scheme will also require that the quality of architecture, materials and detailing of the proposal to be of an outstanding quality. As this is an outline planning application, the quality of the architecture and materials will need to be secured through design codes as request at pre application stage. It is acknowledged that the design guideline document submitted by the applicant makes effort to do this, however further confirmation will be needed to ensure that this will indeed be the case.

Summary

82 In summary, further work is needed to clarify the visual impact of the scheme in longer views and further information is needed to secure the overall quality of materials and architecture through the submission of design codes. In addition the applicant will need to confirm a commitment to meet indicators of residential quality.

Heritage and archaeology
The site is adjacent to Little Common Conservation Area and Brockley Hill Farm House (grade II listed). There are two Scheduled Ancient Monuments (SAM) found within the wider masterplan site. The easternmost part of the site within the EDZ falls within Scheduled Monument Brockley Hill Romano-British pottery and settlement. There are no above ground remains relating to the monument and its setting is necessarily limited as a result. The second 18th-century obelisk Scheduled Monument is set within the grounds of the hospital complex which is currently screened from view by vegetation.

In terms of the design approach taken, the proposals include a new landscaped green park area around the existing ancient monument which will not only create a high quality landscape setting for the 18th-century obelisk Scheduled Monument itself, which will also enhance its setting compared existing conditions on the site.

In addition to the above, as part of the submission a heritage assessment has been carried out whereby the potential effects upon the setting of designated heritage assets have been assessed. This work undertaken concludes that whilst the development will have a minor adverse effect upon the significance of the heritage assets (the Grade II Listed Farmhouse and Barn at Brockley Hill Farm) adjacent to the site, but that the development will not result in any substantial harm to or total loss of significance’ of any designated heritage assets; therefore the development proposals are acceptable and in line with London Plan policy 7.8.

**Inclusive access**

With regards to the hospital use it is understood that at detailed design stage the applicant will fully take into account the needs of all and will ensure that the facility is accessible to all. In particular the design and access statement notes that ‘the design solution must recognise the needs not solely of wheelchair users but of people with a wide range of physical impairments and disabilities, as well as those with impairments of other faculties such as sight and hearing. It must also recognise the needs of children throughout the hospital.’ The applicant has also listed a number of inclusive regulations the detailed design will adhere to, this approach is supported and in line with London Plan policy.

The applicant has committed to achieving Lifetime Homes standards for all units proposed and has confirmed that the masterplan will deliver 10% wheelchair accessible units, both of which are supported and in accordance with London Plan Policy 3.8. The Council should secure compliance with Lifetime Homes Standards through planning condition. However, in order to ensure full compliance to London Plan policies 7.2 and 3.8, the wheelchair accessible units will need to be provided across a numbers of unit types in terms of size and tenure, which again, will need to be secured by the Council through appropriate planning conditions.

Notwithstanding the above, the patients' family accommodation which is proposed as part of the hospital development should include the 10% wheelchair accessible provision, but, it is recommended that some of the 10% provision is designed as, and installed as wheelchair accessible from the outset, to ensure that wheelchair accessible accommodation is available at short notice for the family of a patient should it be required. Further details of this are required before the scheme is referred back at stage two.

Extending the Lifetime Home concept to the neighbourhood level as well as the design of the landscaping and the public realm can help to ensure that the public realm, the parking areas, the routes to the site and links to adjacent public transport and local services and facilities are also designed to be accessible, safe and convenient for everyone, particularly disabled and older people. This is particularly important in this instance given the nature of the health facilities proposed and given the unusual typography of the site.
At the detailed stage the Council will need to ensure that the applicant indicates how disabled people access each of the buildings safely, including details of levels, gradients, widths and surface materials of the paths and how they are segregated from traffic and turning vehicles etc, and how any safe zones are to be created within shared surface areas.

**Air quality**

London Plan policy 7.14 states that development proposals should achieve reductions in pollutant emissions and minimise public exposure to air pollution. The site is located within an Air Quality Management Area (AQMA) and as part of the Environmental Impact Assessment the applicant has undertaken an air quality assessment report as part of the planning application.

The effect on air quality from dust during construction can be significant but with the control measures (including monitoring) set out in the environmental statement and those that will be introduced through the Construction Management Plan, effects are considered to be minor for the construction period of the development. The Council should secure appropriate planning conditions relating to air quality.

During operational phases the applicant has demonstrated and concluded that the impact of the development on air quality receptors is likely to be in significant. The development scheme complies with policy 7.14 of the London Plan.

**Trees**

The site contains a number of woodland areas of varying ages and condition, in total the site contains 628 individual trees, 154 groups and 16 areas of woodland. The applicant has stated that trees within the site are generally subject to Tree Preservation Orders (TPOs), however, further clarification on the numbers of protected trees and the numbers of which are to be removed will need to be given before the scheme is referred back at stage two.

The design and access statement and arboricultural assessment indicates that that it will be necessary to remove a significant number of existing trees at the site to facilitate the redevelopment but that areas characteristic of ancient woodland will be retained and managed. The arboricultural report concludes that the impact of the proposals is considered to be acceptable and provides two points of justifications for this:

- The vast majority of the existing tree cover proposed for removal is of low to moderate quality and reflects the current use and disposition of structures and roads / parking, rather than being an amenity in and of itself; and

- The proposals include very substantial, site and use optimised new planting, which would deliver not an equivalence of tree cover over time, but also a qualitative improvement compared to the existing situation.

Notwithstanding the above, the applicant has not yet demonstrated that all the trees removed as part of the development are replaced with semi-mature native specimens where possible, which could be supported in principle. Although figures have been given for the overall masterplan in terms of retention, it is not currently clear to officers where the losses will be on site and neither is it clear if these any of the losses are protected trees. A clearer indication of the approach to replacement of trees on site should also be given.
Whilst it is acknowledged that the outline masterplan parameters and limits of building deviation mean it may be difficult to definitively identify all the effected trees at this stage, the applicant will need to provide further clarity on this matter to ensure accordance with London Plan Policy 7.21.

**Biodiversity**

As noted in paragraph 14 of this report, the site is located within a Site of Nature Conservation Importance (SNCI); a non-statutory designation for an area comprising flora and fauna of Greater London. The site is also a Site of Metropolitan Importance and forms part of green corridor, important for the movement of wildlife and is part of the London Outer Orbital Path (LOOP).

The applicant has conducted a Framework Ecological Management Plan (FEMP) which includes a full assessment of the current ecological conditions of the RNOH site. It concludes that subject to the implementation of the habitat creation, enhancement and management measures identified in the FEMP, it is demonstrated that the value of the site for ecology will be maintained. In the long-term, following implementation of these measures and establishment of wildlife habitats, the proposals will provide significant enhancements for wildlife. These measures are supported in accordance with London Plan Policy 7.19.

Notwithstanding this, the Council should ensure that the necessary additional ecological studies are undertaken prior to commencement (through planning condition), and that the proposed biodiversity enhancements are secured by way of planning condition/ section 106 legal agreement, as appropriate.

**Sustainable development**

**Energy strategy**

The applicant has broadly followed the energy hierarchy to reduce carbon dioxide emissions and sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

**Energy efficiency standards**

A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Before the scheme is referred back to the Mayor at stage two, the applicant should indicate what other features are to be included as part of the development proposals. The applicant should also set out how demand for cooling will be minimised.

The applicant should also state the savings in regulated carbon dioxide emissions in tonnes per annum resulting from energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

**District heating**

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

105 The applicant is not proposing to install a site heat network. This is not compliant with the London Plan which requires major development proposals to select energy systems in accordance with the hierarchy set out in Policy 5.6. Therefore, in the absence of any existing or planned DHN the applicant should propose an energy system that complies with the London Plan, i.e. a site wide CHP network (with CHP serving appropriate heat loads only) or the applicant should consider the provision of communal heating and cooling to the hospital buildings and the residential apartment blocks.

106 The applicant should clearly state how heat is to be supplied to the residential apartment blocks by providing a drawing of the proposed heat network. This heat network should be supplied from a single energy centre and information on the floor area and location of the energy centre should be provided.

**Combined Heat and Power (CHP)**

107 The applicant should consider a CHP unit as a lead heat source for the site heat network and should calculate and state the reduction in regulated carbon dioxide emissions in tonnes per annum that will be achieved through this second part of the energy hierarchy.

**Renewable energy technologies**

108 With regard to other renewable technologies, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to consider solar thermal, solar photovoltaic (PV), air source heat pumps (ASHP) and ground source heat pumps (GSHP). The applicant should detail how these technologies will be deployed as the ASHP, GSHP and solar thermal will compete for the heat load from each other and a site heat network.

109 Before the scheme is referred back at stage two, the applicant should calculate and state the reduction in regulated carbon dioxide emissions in tonnes per annum that will be achieved through this third part of the energy hierarchy.

**Overall carbon savings**

110 In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

**Transport**

**Car parking**

111 With regards to the hospital element of the scheme, TfL accepts that the provision of 1,015 car parking spaces can be retained and welcomes the plans for consolidating this provision into a multi storey car park as this will reduce the amount of informal parking currently taking place on site, hence allowing the local highway network to operate more effectively.

112 In relation to the residential element, the indicative car parking provision, linked to the indicative housing mix is acceptable and in line with London Plan policy 6.13. As it is an outline scheme, TfL requests that a parking management plan is submitted and is secured by planning condition, ensuring that parking standards are met as part of any future reserved matters applications.
113 At this stage, the applicant is providing no commitment to delivering a provision of electric vehicle charging points (EVCP). For the scheme to be in line with the London Plan, the applicant will need to deliver 20% active and 20% passive EVCP provision, which again should be secured by planning condition.

114 Similarly, the applicant has not submitted any details of blue badge parking; this is particularly relevant given the higher levels of demand for accessible spaces associated with the orthopaedic hospital development. EVCP and blue badge parking provision must similarly be outlined in the parking management plan.

Cycle parking

115 TfL welcomes the indicative cycle parking provision for the residential aspects of the scheme, which is in accordance with London Plan standards. As with car parking, it is requested that this is clarified and secured through the parking management plan.

116 The applicant has not provided any information regarding cycle parking for employees or visitors; whilst it is accepted that cycling has a low mode share due to the remote location of the site, provision is still required in line with London Plan policy 6.9 which requires 1 space for every 5 staff, plus 1 per 10 visitors. Further details on shower and locker facilities for cycling commuters should also be provided before the scheme is referred back at stage two.

Trip generation

117 While the trip generation methodology is supported, confirmation of the TRAVL sites used is however required to ensure robustness. Clarification should also be provided as to the criteria for selecting those sites, to ensure compliance with TfL best practice guidance, and about the use of borough-wide census data as further detailed in TfL’s initial comments.

118 Notwithstanding the above, the Transport Assessment (TA) also looks at potential bus patronage should a service be extended to the site. Whilst for staff and visitors to the hospital trips between the site and stations via bus have been taken into account, this is not the case for the proposed residential uses. Assuming 22% underground use is agreed to be realistic, a significant proportion of these trips would be expected on local bus services to access the stations, potentially increasing further the need for future bus patronage in line with London Plan policy 6.3.

Walking

119 The submission of a comprehensive Pedestrian Environment Review System (PERS) audit is welcomed. The proposals to provide links within the site which will increase the scope for trips by foot are supported and the associated improvements identified should be secured through s106/ s278.

Buses

120 At the pre application stage it was agreed between TfL and the applicant that extending bus route 324 into the site is feasible only when Phase 10 of the development is complete. TfL therefore welcomes reference to this in the resubmitted TA.

121 Currently, the preferred route for the extension provides a one-way loop arrangement, with buses entering the site by turning left from Brockley Hill and passing through the Eastern Development Zone (EDZ) to terminate in the CDZ. Buses would then exit the site by turning left onto Wood Lane and continue to Stanmore station and Brent Cross.
It must be noted, however, that the business case to allow for such bus route extension is marginal, both in terms of the predicted patronage and the extra running time the service will need.

The TA refers to an estimated 348 daily bus trips resulting from the completed development, which is below the level required by TfL to justify such an extension. TfL’s business case assessment has been made on the assumption that:

- the existing NHS shuttle bus would cease to operate once the route extension is provided; and
- the UNO 615 service would remain in place, on the understanding that it is within Harrow Council’s choice whether or not to extend the existing contract beyond 2015. For any extended route to remain viable, however, the UNO 615 service must not duplicate the potential route of the TfL service 324.

It is therefore imperative that the applicant gives assurances that both the shuttle bus and UNO 615 services will cease once the 324 extension is established, and TfL would expect this to be secured through the s106 agreement or similar appropriate legal undertaking.

TfL accepts that the predicted patronage figures are relatively conservative, although they do represent the most robust assessment available. As the scheme progresses TfL is happy to liaise further with the applicant regarding trip generation assumptions.

According to TfL’s calculations, the increase in running time resulting from the extension will mean that one new vehicle will be required to service the route. Slight changes in running time can have significant impacts on costs, therefore it is important that efforts be made through the internal layout and design to ensure buses can operate as time efficiently as possible when accessing and operating through the site. It is envisaged that the route’s current frequency of three buses per hour would remain in place post extension.

The cost of any bus extension should be borne by the applicant through the s106. Given the complexity and long-term nature of the proposals, the costs of the extension cannot be estimated at this stage. Should the extension be put in place, contributions will however be sought for a minimum ‘bedding-in’ period of three years to allow patronage to build up.

Furthermore, masterplan and parameter plan maps showing the proposed route for the extension are required, including the corridor which the route would take through both the EDZ and CDZ, and the location of bus stops, bus stand and driver facilities.

TfL expects the following key bus infrastructure requirements to be addressed and secured:

- A drop off point, bus stand and bus stop are required at the proposed terminus in the CDZ. The same kerbside can be used for each of these features but it is important that they are clearly differentiated and designed in accordance with TfL’s guidelines.
- The applicant must decide whether to include other bus stops, for example in the EDZ, in their designs and bearing in mind any stop in the EDZ will be for alighting only.
- As Harrow Council has currently no plans to adopt the highway within the site, a licence agreement will need to be put in place with strong safeguards which guarantees the roads are of an adoptable standard.
• Despite following a one-way loop routeing, the bus would travel on two-way roads within the site. Therefore, roads are required to be of minimum standards of 7.5m in width except where otherwise agreed with Harrow Council. In light of this TfL welcomes the inclusion of Plan RH9 in the resubmission material, showing road widths in the EDZ which could accommodate the bus, as agreed with TfL. Similar plans, showing road widths and route alignment, are required for all parts of the site.

• TfL should be kept updated on the progress of the redesign of the Brockley Hill/Wood Lane junction. The junction design will need to ensure that buses are allowed to operate in the most effective and time-efficient manner possible, as this will improve the business case in terms of the running time issue outlined above.

130 A commitment to agreeing the precise details of the above infrastructure requirements with TfL should therefore be embedded into the section 106 agreement.

131 In the shorter term, TfL considers that the condition of, and access to, the existing bus stops adjacent to the Brockley Hill entrance to the site should be addressed. The bus stop audit included in the TA states that both bus stops require upgrading/improvements to meet current standards and TfL requests that contributions be made through the section 106 agreement in this respect.

132 In addition to improvements to the stops themselves, TfL considers that the provision of a safe crossing point to the southbound bus stop is central to its accessibility in line with London Plan policy 6.7. TfL and Harrow Council are in agreement that the applicant, therefore, should develop a proposal for the bus stop improvements and crossing which can then be costed by the TfL. Any contribution in this respect would be additional to that towards the above route extension. The applicant and Harrow Council are also asked to update TfL on the proposals for the redesign of the Brockley Hill/Wood Lane junction, as it may have implications on the accessibility of the bus stops. This issue should be included in the wording of the s278 agreement.

133 In terms of the bus stops on Wood Lane serving the 615 bus, these were also identified in the TA as requiring upgrade. Given their proximity to the proposed mini-roundabout, it has been agreed that these improvements can be incorporated in the associated s278 agreement. Further discussions on the scope of this work can take place at a later date.

134 In light of the above and given the complexity raised from the redevelopment proposals on local buses and associated design, TfL would therefore strongly encourage to be party to the transport element of the s106 agreement.

Travel and Delivery & Servicing Plan

135 The applicant has submitted a Strategic Site-Wide Travel Plan, which is welcomed; TfL is in agreement that a Delivery & Servicing Plan (DSP) should be submitted for local authority and TfL’s approval prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities should be kept to the minimum. The submission of the DSP should also be secured by condition.

136 As stated in the TA, a Construction Logistics Plan (CLP) should also be submitted for TfL and Harrow Council for approval prior to construction works commencing on site. This should be secured by condition.
CIL requirement

137 In accordance with London Plan Policy 8.3 the application of the CIL charge commenced in April 2012 and will be paid by most new development in Greater London (noting that health facilities are exempt).

138 The Mayor has arranged boroughs into three charging bands, with rates of £50 / £35 / £20 per square metre of net increase in floorspace respectively. The proposed development is within the London Borough of Harrow where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website http://london.gov.uk/

139 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Harrow Council is yet to adopt a scheme.

Local planning authority’s position

140 At the time of writing this report the Council’s formal position is unknown; however, Council officers are generally supportive of the scheme.

Financial considerations

141 There are no financial considerations at this stage.

Conclusion

142 London Plan policies on principle of development (Green Belt, health use and enabling residential development), housing (staff accommodation/affordable housing, mix of units, residential quality and density), children’s play space, urban design, heritage/archaeology, inclusive access, air quality, trees, sustainable development and transport are relevant to this application. The application complies with some of these policies but not yet with others and on balance does not yet comply with the London Plan. The reasons and the potential remedies to issues of non compliance are set out below:

- **Principle of development**: The principle to deliver a bespoke re-provision of a nationally significant and world class hospital facility on an existing hospital site within the Green Belt is acceptable. The proposal to deliver enabling residential development (to directly cross-subsidise the new hospital development), replacement staff affordable accommodation and other needed uses to support the delivery of the new hospital is also accepted; the applicant has provided adequate material and justification for development on the Green Belt and in doing so has demonstrated that there will be no increase of development footprint and that there will be no greater impact on the openness or character of the Green Belt. The applicant has also demonstrated very special circumstances exist. Therefore, in this exceptional case and on balance the principle of development is supported in London Plan policy terms.

- **Housing**: Within the context of the Green Belt justification the delivery of housing on this site is acceptable. The small loss of staff accommodation is also accepted exceptionally in this instance as the applicant has demonstrated through viability work that any additional provision would render the delivery of the important first phase of the hospital unviable. Notwithstanding this, in order to satisfy policy tests of the London Plan, the applicant’s viability work which has been submitted will be independently assessed is in line with polices 3.11 and 3.12. Further clarification is sought with respect to the indicative residential mix for the staff accommodation. With regards to residential quality a number of planning conditions will need to be secured before the scheme is referred back at stage two for the scheme to be
compliant with London Plan policy 3.5. The residential density is lower than the threshold set out in London Plan policy 3.4 and table 3.3 respectively; however, given the site’s Green Belt context, the residential density is accepted.

- **Children's playspace**: Clarification of the child yield figures and associated play space requirement is sought and a play strategy should be submitted so that the scheme complies with London Plan policies 3.6 and is acceptable in this regard.

- **Urban design**: The proposed design is generally supported in line with London Plan policies contained in chapter seven and the applicant has demonstrated that there will be no impact on openness of the Green Belt, however; the applicant is requested to provide clarification of some longer views.

- **Heritage/archaeology**: The development will not result in substantial harm to or total loss of significance of any designated heritage assets; therefore the development proposals are acceptable and in line with London Plan policy 7.8.

- **Inclusive access**: The scheme currently fails to comply fully with London Plan policies 3.8 and 7.2. before the scheme is referred back to the Mayor clarification is needed.

- **Air quality**: The applicant has provided adequate information and the development proposals comply with policy 7.14 of the London Plan.

- **Trees**: Whilst it is acknowledged that the outline masterplan parameters mean it may be difficult to definitively identify all the effected trees at this stage, the applicant will need to provide further clarity on this matter to ensure accordance with London Plan Policy 7.21.

- **Biodiversity**: The applicant has demonstrated that the value of the site in terms of biodiversity and ecology will be maintained and, in the long-term will provide significant enhancements for wildlife, which is in accordance with London Plan Policy 7.19. The Council should ensure that the necessary and appropriate planning conditions/ section 106 legal agreement in this regard are secured.

- **Sustainable development**: In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

- **Transport**: TfL accepted the parking levels for the site, which are in line with London Plan policies. The applicant will need to submit a parking management plan, provide 20% electric vehicle charging points, details of blue badge parking, a PERS audit and relevant travel and delivery and servicing plans, all of which will need to be secured by the Council via planning condition and S106 as appropriate. Further information is also required with regards to staff and visitor cycle parking. With regards to bus provision before the scheme is referred back at stage two, the applicant will need to give assurances that both the shuttle bus and UNO 615 services will cease once the 324 extension is established, and TfL would expect this to be secured through the s106 agreement or similar appropriate legal undertaking. A commitment to agreeing the precise details of the key bus infrastructure requirements with TfL should therefore be embedded into the section 106 agreement.
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