

5 September 2016

Dulwich Hospital, East Dulwich Grove

in the London Borough of Southwark

Planning application no. 16/AP/2747

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

Erection of a health centre within a part 2, part 3-storey building to accommodate medical services and related uses (Use Class D1), access, parking and servicing areas, hard and soft landscaping and associated groundworks.

The applicant

The applicant is **NHS Lift Co** and the architect is **Murphy Philips Architects**.

Strategic issues summary

- **Land use** – use of the site for replacement health care centre is supported. (paras.15-18)
- **Urban design** – design of new building supported. (paras. 19-23)
- **Climate change** – proposals broadly acceptable, further information requested on energy savings. (paras. 29-41)
- **Transport** – cycle parking levels should be increased, further information required on car parking, and pedestrian and cycle audit required. (paras. 42-49)

Recommendation

That Southwark Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, for the reasons set out in paragraph 54 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 19 July 2016 the Mayor of London received documents from Southwark 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 29 August 2016 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 Two planning applications have been submitted and referred to the Mayor for development on the same site (the other application being D&P/4053, LPA ref: 16/AP/2740, for the erection of a new secondary school on the northern and western parts of the site). Whilst neither application proposal is referable in itself, the two concurrent applications would amount to development with a total floorspace of more than 15,000 sq.m. Paragraph 2 of the Schedule of the Order 2008 states that: *"If the local planning authority receive an application for planning permission for development, which they consider forms part of more substantial proposed development, on the same land or adjoining land, they must for the purposes of this Schedule treat that application as an application for planning permission for the more substantial development."*

3 This application is thus referable under Category 1B.1 (c), of the Schedule of the Order 2008: *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) 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"*.

4 Once Southwark 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.

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

Site description

6 The whole application site (including the land proposed for the school development) is approximately 2.8 hectares in size and is occupied by buildings associated with Dulwich Community Hospital. The land comprising this application is 0.7 hectares in size and is in the south-eastern corner of the site. The site is bounded to the north and west by parcels of land which are to form part of the school development, to the south by East Dulwich Grove and to the east by housing on Melbourne Grove. Existing access to the wider site is from East Dulwich Grove and Jarvis Road (a short cul-de-sac off Melbourne Grove).

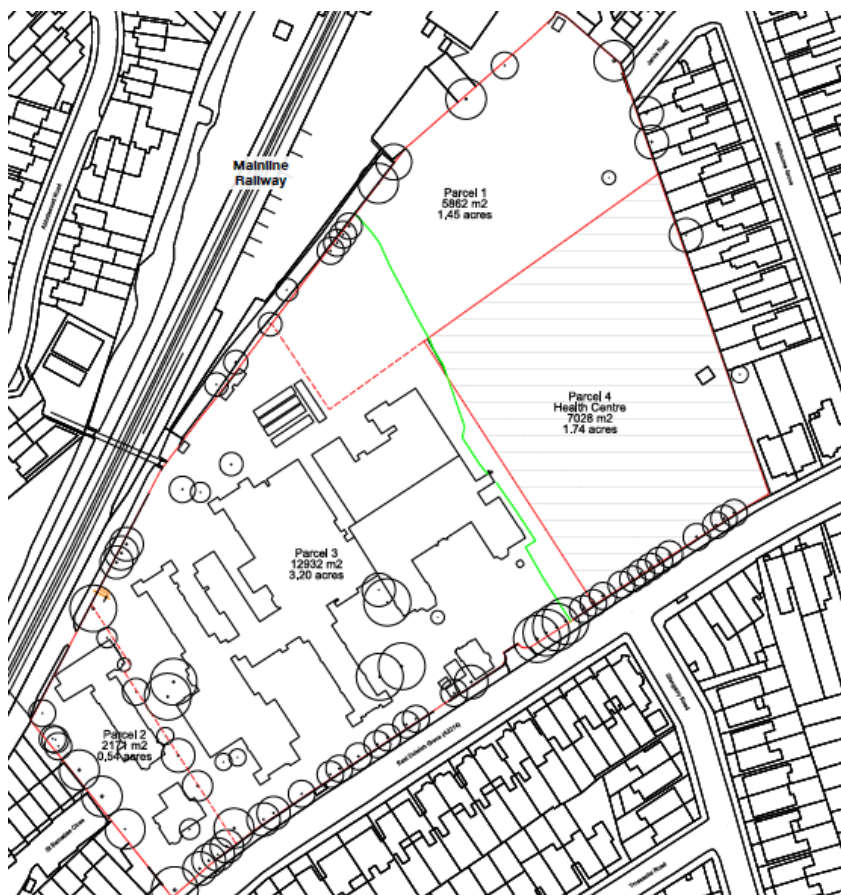
7 The existing buildings on the wider site are predominantly Victorian red brick hospital buildings comprising of a central entrance block known as the "Chateau" and two connected three storey wings to the west. The application site used to house two mirroring wings plus some ancillary hospital buildings, but these were demolished in 2006 and this part of the site is currently cleared land. The site is not within a conservation area and the remaining buildings on the adjacent sites are not statutorily or locally listed.

8 The Education Funding Agency (EFA) has purchased three parcels of the site from the NHS and these are to be leased to the Charter School East Dulwich on a peppercorn rent for 125 years. The sale agreement with the NHS will see these parcels released to the EFA as follows:

- Parcels 1 and 2, the north-east and south-west parcels, were released on contract completion in October 2015.
- Parcel 3, the central parcel, is expected to be released in April 2019 when the NHS clinical services are relocated to the new Dulwich Health Centre.

(Parcels 1, 2 and 3 together comprise 2.1 hectares and form the separate planning application site for the school.)

- Parcel 4, in the south-east corner of the site is being retained by the NHS for the development of the Dulwich Health Centre and is the subject of this planning application.



9 The nearest part of the Transport for London Road Network (TLRN) is approximately 2.5 km away (Peckham High Street) and the nearest part of the Strategic Road Network (SRN) is approximately 200m away (Lordship Lane). Six bus routes currently stop on East Dulwich Grove outside the site or on Lordship Lane. An additional route will also stop on East Dulwich Grove from this autumn. East Dulwich (Southern services) station is a 200 - 500m walk depending upon proximity to the Jarvis Road access. Measured on a scale of 1a – 6b the site has a PTAL rating of 3 which is considered moderate with that part on Jarvis Road having a PTAL of 4 (good). The site is well served by a network of on and off highway cycle and pedestrian routes, including the proposed Quietway 7.

Case history

10 There is no relevant GLA case history for this site.

Details of the proposal

11 The application proposes the erection of a health centre within a part 2, part 3-storey building to accommodate medical services and related uses (Use Class D1), access, parking and servicing areas, hard and soft landscaping and associated groundworks.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Land use principle *London Plan*
- Health facilities *London Plan; Social Infrastructure SPG*
- Urban design and Heritage *London Plan; Shaping Neighbourhoods: Character and Context, SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Climate change *London Plan; the Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Sustainable Design and Construction SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*

13 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 Southwark Core Strategy (2011), the Southwark Plan (2007) (saved policies), and the 2016 London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- Dulwich SPD (2013)
- Dulwich Hospital Planning Brief (2005)

Principle of development

Healthcare facilities

15 The proposed school (which is the subject of a separate application on the adjoining land, GLA ref: D&P/4053) would be partly built on the site of the existing Dulwich Community Hospital. London Plan Policy 3.18 (Health and Social Care facilities) states that "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."

16 The application involves the provision of a new healthcare facility, to replace the existing facility that operates from within the Victorian hospital complex. The separate, concurrent application (ref: 4053) seeks permission for the demolition of the part of the hospital building and the redevelopment of the site as a school. The development would be phased so that the erection of the new healthcare centre is part of the first phase of the wider development, allowing services to continue within the existing building until such time as the new facility can be occupied.

17 Although the existing hospital buildings have an extensive floor area, it is understood that the majority of the floorspace is vacant and unoccupied. The applicant should clarify how much floor space of the existing hospital is actually in use, and how much is vacant. It is also

understood from the application documents that the new healthcare facility will reprovide the existing health services, plus additional services. The new health centre is intended to provide a purpose-built, modern facility that is fit for purpose and provides flexibility to meet the changing healthcare needs of the local population. The building has been designed to provide additional capacity in areas where current health trends indicate that demand will exceed current capacity. It is intended that the centre will provide GP services and a pharmacy, services for people with long term conditions (including chronic kidney disease, diabetes, heart disease, chronic asthma and some mental health services), diagnostics and outpatient services, and primary care children's services. However, if any existing services are to be relocated off-site or not reprovided, this should be clarified and justified by the applicant.

18 The phasing of the development of the school and the new health centre should be secured within the S106 agreement, to ensure that healthcare facilities remain operational at the site throughout the development process. Provided that the new facility will provide equivalent or improved healthcare services compared to the existing site, the GLA support the proposal in land use terms, and the provision of a modern, purpose built health centre to meet the needs of the local community.

Urban design

19 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

20 The application site is currently a vacant plot, as the eastern ward blocks and miscellaneous hospital outbuildings that used to occupy the site were demolished a number of years ago. The proposed school development covered by the separate planning application would involve the retention of the central administration block (the "chateau") and the erection of three new blocks to the north and west of the retained building. The proposed health centre would be built to the east of the retained chateau building, and would sit separately from the school site, with its own pedestrian and vehicle access and boundary treatment.

21 The new building would be 2-3 storeys in height and arranged in a quadrangle around a central courtyard. The building would be predominantly clad in red brick to complement the materials of the chateau and surrounding building. The building would be contemporary in its form and detailing, employing a simple geometric form and punched window openings with recessed brick panels. The elevations would be broken up with sections of aluminium cladding and vertical fins to the front elevation, marking a legible main entrance. The quality of the detailing would be applied to all four elevations, as the building would be visible from a wide range of vantage points from the public realm and from within the proposed school complex.

22 The approach to the design would be consistent with the proposed design for the school buildings, and the proposed health centre would thus be read as part of the wider complex. The scale and massing of the building would sit comfortably within its context. Like the proposed school buildings, the modest height and massing of the new building and its calm, contemporary design would be sympathetic to the setting of the retained chateau. The proposed design for the healthcare centre is therefore supported.

23 In terms of the wider landscaping proposals, it is notable that the space surrounding the building seems dominated by car parking and hard surfacing. As noted in the transport section below, it is considered that the car parking could be reduced, and if this is the case, this would

give the opportunity for a better design response to the site, with more soft landscaping and planting and more opportunity for incorporating SuDS (see paras 38-41). The amount of car parking should be reconsidered and further justified.

Inclusive access

24 London Plan Policy 7.2 seeks to ensure that all new development achieves the highest standards of accessible and inclusive design. In accordance with this policy, the applicant has submitted a design and access statement which explains how the principles of inclusive design have been incorporated into the proposed development and how inclusion will be maintained and managed.

25 The applicant's Design and Access statement explains that addressing inclusive access is a key consideration in the design of this public health centre. Consideration has been given not just to wheelchair users but also the ambulant disabled, those with vision, hearing and other sensory impairments, as well as elderly people, children and parents. The building would fully comply with Part M of the Building Regulations and also NHS design guidance which often exceeds Building Regulations requirements.

26 It is confirmed that there would be level access throughout the buildings and the external circulation areas. The health centre would have a car park with 7 accessible parking spaces, located close to the building. Pedestrian routes would be segregated from traffic and textured strips would indicate crossing points. Within the building, accessible lifts and accessible sanitary facilities will be provided on all floors. Corridor widths would be at least 1500mm. Reception desks would be designed to accommodate wheelchair users and the public areas would be equipped with hearing enhancement systems.

27 The Council should ensure, via planning condition, that the key features of the applicant's accessibility strategy are implemented in the final design. They should also ensure that the route between the centre and the nearby bus stops, and the bus stops themselves, are accessible.

Climate change mitigation and adaptation

29 The London Plan climate change policies as set out in Chapter 5 collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which applicants must address mitigation of and adaptation to the effects of climate change.

30 The applicant has submitted an Energy Assessment which broadly applies the energy hierarchy in policy 5.2 of the London Plan. However, further information is required before the carbon savings can be verified, as outlined below.

Energy efficiency standards

31 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, controls and high efficiency cooling systems.

32 The demand for cooling will be minimised through solar control glazing, mechanical ventilation heat recovery (MVHR) systems and openable windows during summer. The applicant should provide evidence of how London Plan Policy 5.9 has been assessed demonstrating how the

risk of overheating and the cooling demand will be minimised (for each building type). Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended. The full sample BRUKL sheet including efficiency measures alone should be provided.

District heating

33 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, stated that they are liaising with the design team of the proposed Charter School on the adjacent site, with a view to providing a shared network. This opportunity should be further pursued and evidence of communication should be provided in order to demonstrate that this option has been fully investigated. The applicant should additionally provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant should also clarify if a site heat network is being considered and provide information on the proposed plant room/energy centre. Information on the floor area, internal layout and location of the energy centre should be provided.

Combined Heat and Power (CHP)

34 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. The applicant should provide information on the expected annual domestic hot water (DHW) and space heating demand of the proposed development before this is considered acceptable.

Renewable energy technologies

35 The applicant has investigated the feasibility of a range of renewable energy technologies, and is proposing to install air source heat pumps (ASHPs) systems and photovoltaic (PV) panels. It is proposed that the ASHPs with Fan Coil Unit (FCU) systems will be used to provide high efficiency heating to quickly respond to any sudden climate and occupancy changes. These will complement the radiator's heating provided by the LTHW. The study has also indicated that there is the possibility to install 125m² of PV panels orientated south at an inclination of 30°.

36 The full sample BRUKL sheet of the 'be green' scenario should be provided in order to verify the inputs. The applicant should also demonstrate that the energy hierarchy has been followed and a CHP option has been fully investigated before the incorporation of renewable measures for heating purposes.

Overall carbon savings

37 A reduction of 7 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed 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.

Flood risk and drainage

38 The flood risk assessment (FRA) has been completed by Price & Myers on behalf of the applicants. The FRA confirms that the site is located within flood Zone 1 and is at low risk of flooding. The proposed development is acceptable in terms of London Plan Policy 5.12.

Drainage

39 The site itself has relatively low surface water flood risk. However areas close to the site, including to the immediate north and east are at significant surface water risk, and surface water from this site will contribute to that risk, therefore the application of London Plan policy 5.13 will be an important consideration for these development proposals.

40 The FRA states that the development will be designed to reduce surface water run-off from the site up to the 1 in 100 year storm by at least 50%. The method proposed is a below ground attenuation tank, although a rainwater harvesting system is also proposed.

41 Given the nature and location of the proposals this approach is considered to be the minimum acceptable approach to London Plan Policy 5.13. The detailed drainage design should be agreed with Southwark Council and a condition securing a sustainable drainage strategy meeting the requirements of London Plan Policy 5.13 should be applied to any planning approval. As noted in the design section, additional soft landscaping would help meet these policy requirements.

Transport

Location and access

42 Access to the health centre is proposed for vehicles (including cycles) and separately for pedestrians via new points from East Dulwich Grove. In addition there is a route identified for emergency vehicles and pedestrians and cyclists via Jarvis Road.

Network impact

43 The development proposals are unlikely to have a negative impact on the capacity or operation of the TLRN or the SRN. Southwark Council should ensure that it is satisfied with the impacts on local highway including the proposed accesses off Jarvis Road and East Dulwich Grove. Some issues need to be addressed to enable compliance with the London Plan, as further detailed below.

Walking and cycling

44 Cycle parking to meet the requirements of London Plan policy should be provided from the outset. Currently the proposals are for 28 cycle parking spaces (whereas the London Plan policy requires a minimum of 85) and for this to be monitored over time. However, as well as the additional burden that would be placed on the local authority, this increases the chances of under provision at certain stages thus discouraging cycling and also risks suitable sites being used for other purposes. Given the opportunities for cycling in the area and the intended local catchment, cycle parking at or above the minimum policy requirement should be provided for staff and visitors to the building. This aspect of the scheme should be amended before the scheme is referred back to the Mayor at Stage 2.

45 Cycle parking for visitors should be located close to the main entrance to the building and the cycle parking for staff should be provided in covered secure area(s) near the staff entrance. Cyclist changing and locker facilities should also be provided, and these together with the cycle parking should be secured by planning condition.

46 An audit of both the pedestrian and cyclist environment in the area and any identified improvements should be secured as part of any permission. Ensuring safe and convenient crossing of East Dulwich Grove should in particular be considered for those walking to the site or

using local bus services. Legible London or similar signage would promote walking (e.g. between the site and the station and Lordship Lane bus stops) by those using the health centre.

Car parking

47 Forty six car parking spaces are proposed for health centre staff and patients, including policy compliant blue badge parking and electric vehicle charge points. Whilst it is recognised that some staff may require a car to visit patients and there is a need to make adequate provision for Blue Badge holders this amount of car parking seems high and a reduction is therefore requested. This would encourage staff, visitors and patients (who are able) to walk, cycle, or use public transport with resultant sustainability and health benefits. Adequate provision for on-site drop off and pick up by car, ambulance and specialist transport should also be secured. A management plan should be required via condition and should cover arrangements for the drop off/pick up area, the car parking and access routes. Staff should also be prevented from obtaining CPZ parking permits unless Blue Badge holders or justified work needs.

Delivery and Servicing

48 All servicing will be on site and should be managed through a Delivery and Service Plan (DSP) secured by condition. A Construction Logistics Plan (CLP) should also be secured by condition to appropriately manage any potential adverse effects on the highway network, including vulnerable road users and bus operations, during the works.

Travel Plan

49 A robust travel plan for the health centre should be submitted and agreed by the Council prior to first occupation. The travel plan should be secured, enforced, monitored and reviewed by condition/legal agreement. To promote sustainable and active travel, staff and visitors should be encouraged to either walk, cycle or take public transport and any necessary improvements to these links should be secured by condition/legal agreement.

Community Infrastructure Levy

50 In accordance with policy 8.3 of the London Plan, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. However, development for medical or health services has a nil charge.

Local planning authority's position

51 It is understood that the application will be reported to Southwark Council's planning applications committee in October 2016, and that officers are broadly supportive of the proposals.

Legal considerations

52 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.

Financial considerations

53 There are no financial considerations at this stage.

Conclusion

54 London Plan policies on principle of land use, biodiversity and landscaping, design, inclusive access, climate change, employment and training, and transport are relevant to this application. The application broadly complies with these policies. Further information is required to demonstrate full compliance, as follows:

- **Principle of land use:** The continued use of the land for healthcare use is supported.
- **Design and Heritage:** The approach to the design, appearance and layout of the new buildings is supported, but soft landscaping should be increased.
- **Inclusive access:** The development has been designed to address the accessibility requirements of all staff and patients, and these measures should be secured by condition.
- **Climate change:** Further information overheating modelling and on the option to share a district heating network with the school should be provided. The expected heating and hot water demand and the full sample BRUKL sheets scenario should also be provided.
- **Transport:** The development should provide a London Plan-compliant level of cycle parking from the outset and additional information should be submitted on this. A pedestrian and cycle environment audit should be carried out and any improvements identified as necessary should be secured. The on-site parking provision should be reduced where possible or further justified. A travel plan, construction management plan and delivery and service management plan should be secured via condition or the Section 106 agreement.

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