

SOUTH WEST LONDON AND
ST GEORGE'S MENTAL HEALTH
NHS TRUST

LAND AT BARNES HOSPITAL, SOUTH
WORPLE WAY, BARNES, RICHMOND,
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PLANNING STATEMENT

OUTLINE PLANNING APPLICATION

NOVEMBER 2018

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EXECUTIVE SUMMARY

1. This Planning Statement has been prepared to support an outline planning application for the redevelopment of Barnes Hospital, on behalf of South West London and St George's Mental Health NHS Trust (SWLSTG) (the Applicant). The application is for all matters to be reserved other than access into the site.
2. The development strategy is underpinned by the Applicant's Estate Modernisation Programme (EMP), which will enable an ambitious programme for the modernisation of mental health facilities across south west London. The Trust's clinical strategy focuses on inpatient accommodation at Springfield Hospital, Tooting Hospital and Tolworth hospitals. The provision of in-patient services at Barnes Hospital was ruled out on the basis of compliance with the Royal College of Psychiatry's guidelines and on value for money grounds.
3. Barnes Hospital was declared surplus by the Trust Board in November 2015, and was identified for redevelopment to create best value to support the EMP. The disposal of the Barnes Hospital site is a key factor in enabling the Estate Modernisation Programme. The existing site consists of a number of hospital buildings (Use Class C2) of which the majority have been vacant for a prolonged period.
4. The proposal is seeking outline planning permission, other than for access to the site for which detailed permission is sought, for:
 - A SEN school for up to 90 pupils which the Council has identified a specific need for;
 - A medical centre (up to 2,500sqm), which will include an element of mental health floorspace;
 - Up to 83 new build residential units, of which a percentage will be affordable, to help relieve the pressure on the Borough's housing demands;
 - Retention of 3 Buildings of Townscape Merit; and
 - The provision of open space which provides a valuable resource to serve residents.
5. The proposal is supported by an illustrative masterplan and a series of parameter plans and a Design Code to guide the detailed design of the site at reserved matters stage. This has been assessed against a number of environmental disciplines to determine impacts on the locality and environment, which overall demonstrates that the Proposal provides a number of benefits without detriment to the local environment, highways or neighbouring uses and occupants.
6. The proposal seeks to deliver a substantial amount of health and education floorspace to support the local community. In tandem with the proposed residential component, the strategy makes effective use of a significant brownfield site in the Borough. This meets the Council's strategic housing supply and community provision policies.

7. This statement will explain how the proposals accord with all relevant national, regional and local policies and should therefore be approved.

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Montagu Evans LLP on behalf of South West London and St George's Mental Health NHS Trust (SWLSTG) (the Applicant) in support of an outline planning application for the redevelopment of Barnes Hospital. The application is for all matters to be reserved other than access into the site.

1.2 The Proposal (or Proposed Development) is for:

“Outline planning permission for the demolition and comprehensive redevelopment (phased development) of land at Barnes Hospital to provide a mixed use development comprising a health centre (Use Class D1), a Special Educational Needs (SEN) School (Use Class D1), up to 80 new build residential units (Use class C3), the conversion of two of the retained BTMs for use for up to 30 residential units (Use Class C3), the conversion of one BTM for medical use (Use Class D1), car parking, landscaping and associated works. All matters reserved save for the full details submitted in relation to access points at the site boundaries”.

1.3 The application site, Barnes Hospital, is land which has been declared surplus by the Applicant and consists of a number of buildings which were last used as a mental health hospital (Use Class C2). The proposal is seeking to establish the principle of the following:

- A SEN school for up to 90 pupils which the Council has identified a specific need for;
- A state of the art medical centre, which will include an element of mental health floorspace;
- New build residential units, of which a percentage will be affordable, to help relieve the pressure on the Borough's housing demands;
- The retention of 3 Buildings of Townscape Merit (BTM) of which two are to be converted into 3 residential units and the other into healthcare floorspace;
- The provision of open space which provides a valuable resource to serve residents; and
- Prioritising sustainable development by encouraging cycling and public transport.

Outline Application

The outline application seeks to establish the principles of use, amount and massing of development. All other matters, except for details of access points at the site boundaries, are reserved for future consideration.

1.4 A series of Parameter Plans, submitted for approval, support the outline application and establish the development's parameters in terms of land use, height, density and access into the site for the proposed developable area and public realm. It is anticipated that any planning permission granted would include a condition requiring any forthcoming reserved matters application relating to appearance, layout, scale

landscaping and access within the site to be fully in accordance with the approved Parameter Plans and Design Code.

- 1.5 In addition to the Parameter Plans which are submitted for approval, detailed access plans have been submitted, showing the vehicular and main pedestrian access and egress arrangements to the site. Full details of internal access routes will be included at the reserved matters stage.
- 1.6 The Planning Statement forms part of the information which has been submitted with the application, and is to be read in conjunction with all submitted application documents as set out in Section 4 of this report.

Purpose and Format of the Planning Statement

- 1.7 This Statement sets out the details of the proposed development and assesses them against relevant planning policies of the Development Plan, the National Planning Policy Framework (NPPF) and other relevant material considerations.
- 1.8 The purpose of this Planning Statement is to examine the context of the application and provide a planning assessment of the scheme. This is achieved by describing the proposals; confirming the extent of discussions and liaising with key stakeholders and the local community; identifying planning policy at a national, regional and local level relevant to the consideration of the proposals; identifying other material considerations; examining the proposals in the context of planning policy and those considerations. Having regard to all this the Statement concludes why the proposals are considered acceptable.
- 1.9 This Statement is structured as follows:
- Executive Summary;
 - Section 1: Introduction;
 - Section 2: Background – this sets out the context and need for the Proposed Development;
 - Section 3: Site Description – this looks at the site, relationships with its surroundings and coverage of statutory and non-statutory designations. It also presents the relevant planning history for the site;
 - Section 4: The Planning Application – this addresses the procedural elements of the planning application whilst outlining the Proposal;
 - Section 5: Community Engagement – this describes the level of engagement undertaken as part of the planning application process;
 - Section 6: Planning Policy Framework Review – this details the adopted and emerging planning policies as well as other material planning considerations relevant to the Proposed Development;
 - Section 7: Planning Appraisal – this appraises the Proposal against the planning policy framework and other material planning considerations; and
 - Section 8: Planning Conclusion – this summarises the Planning case for the Proposal.

2.0 BACKGROUND

2.1 This Section sets out the background to and rationale for the Proposed Development at Barnes Hospital. It summarises the principal requirements of the Trust and the wider Estate Modernisation Programme (EMP).

Estate Modernisation Programme

2.2 The Trust was established in December 1994 and provides local mental health services to about 1 million people in South West London and a range of specialist regional and national services.

2.3 The Proposal is part of the Trust's Estates Modernisation Programme which will enable the Trust to embark upon an ambitious and much needed programme for the modernisation of the mental health facilities serving south west London.

2.4 In 2013 the Trust, with its service users, staff and local community, undertook an option appraisal of a long list of possible sites for inpatient services. This took into consideration the Barnes site along with other sites such as Springfield, Tolworth, QMH Roehampton, Sutton and Richmond Royal. Of the various options proposed, two options were short listed for inpatient accommodation. These were; two sites at Springfield and Tolworth and three sites at Springfield, Tolworth and QMH. All the longlist options featuring Barnes were ruled out on the basis of non-compliance with Royal College of Psychiatry guidelines and on value for money grounds

2.5 Running concurrently with this inpatient options appraisal, the Trust began to firm up its clinical strategy. This was to provide a community model whereby care is focused on patients in their own homes or communities and not via inpatient accommodation. The Trust developed this further into its "hub" and "spoke" model. The "hubs" are those sites within boroughs where significant outpatient consultations could take place as well as having administrative bases to support those services. The "spokes" are those sites where clinicians could be closer to patients in shared community buildings such as churches, leisure centres and GP practices etc.

2.6 In order to deliver this "hub" and "spoke" model the Trust undertook a full review during 2014 /15 to define where it needed to operate from, and what needed to be in those spaces. Clearly, key to this was the need for the Trust to undertake site appraisals for each of the boroughs, and to understand those sites that could cater for this type of service. A key priority for a "hub" was the need for an existing Trust presence and/or to be deliverable. This naturally led to the site needing to be within the ownership of the Trust. As such, Barnes was chosen as a "hub" in Richmond. Examples of our other "hub" sites are Tolworth in Kingston and the Springfield site in Tooting.

2.7 All of this work culminated in a public consultation on the Trust's inpatient proposals which took place between September 2014 and March 2015. It also culminated in the Joint Health Overview Scrutiny Committee (JHOSC) approving, in March 2015, a move to two inpatient sites at Springfield and Tolworth. Furthermore, the estate

strategy detailing the "hubs" and "spokes" and community support to the inpatient proposals was also supported by all Clinical Commissioning Groups (CCGs). The proposals for Barnes reflects all of this thinking.

- 2.8 Barnes Hospital was declared surplus by the Trust Board in November 2015, and was placed on the Electronic Property Information Mapping Service (ePIMS) in August 2016, which is the central database of Government Central Civil Estate Properties and Land.
- 2.9 The Trust is required to use their assets in the most efficient way, with this underutilisation the Trust Board declared the Barnes Hospital site surplus to requirements and are required to secure the 'best price' for its asset. This 'best price' will be used to help enable the Estate Modernisation Programme. Due to the site being potentially deemed as surplus to requirement, it is noted in the Health Building Note 00-08 that *'a surplus property should be sold as soon as possible and not be retained in the expectation that the market might improve.'*
- 2.10 The Trust is, however, committed to retaining a presence on the site which is evidence in the proposal for a healthcare facility to be housed on the retained plot of land. This is to support the social infrastructure requirement on the site, the legacy requirements and due to the constraints and opportunities of procuring a new plot of land in the area and receiving planning permission to build a new facility.
- 2.11 The proposed changes have been consulted on as part of the 2014 public consultation on proposals for future mental health services provision, as well as the Trust's Estate Strategy and EMP Outline Business Case, accepted by CCGs and Department of Health (DofH). The Estates Strategy states that *"This Trust has made a commitment to its service users, carers and the local community to transform current mental health service provision and deliver sustainable, quality, affordable services that are fit for the future."* Disposal of the Barnes Hospital site and re-investment of the sale proceeds would greatly boost this transformation. The Full Business Case for the EMP is currently being produced and will be submitted for approval by the Department of Health.
- 2.12 The disposal of the Barnes Hospital site is a key factor in enabling the Estate Modernisation Programme. The modernisation strategy is based upon providing two main campus facilities at Springfield Hospital, Tooting and Tolworth Hospital, Kingston. These will serve people from the five boroughs in the Trust's primary catchment area, including the Borough of Richmond. The proposed hospitals for both Springfield and Tolworth have full planning permission. Without the receipt of funds from the site's disposal the EMP would be hindered from progressing, putting increased pressure on the funding requirement.

SEN SCHOOL

- 2.13 The brief, set by The Department for School Planning of Kingston and Richmond, for the proposed 90 pupil school has been set out within the accompanying Design and Access Statement.
- 2.14 The Department for School Planning of Kingston and Richmond have submitted, on the 15 October 2018, a bid for funding to the Educational Funding Authority (EFA) for a 90 pupil SEN school designated for children and young people with Social, Emotional and Mental Health needs at Barnes Hospital. It is anticipated that the EFA will announce which boroughs are successful late 2018 / early 2019.

3.0 SITE DESCRIPTION

The Application Site

- 3.1 The site is located within the administrative area of the London Borough of Richmond and comprises an area of approximately 1.4 ha (14,350 sqm). Its location can be seen on the submitted site Location Plan (Appendix 1).
- 3.2 The Site is bound to the north by South Worple Way with rail tracks beyond that. To the east South Worple Avenue bounds the Site with terraced residential dwellings beyond. Residential dwellings fronting Grosvenor Avenue bounds the Site to the South and Mortlake Cemetery forms the boundary to the west.
- 3.3 While there are no statutory listed buildings on the Site, the 8 existing buildings on the Site are identified as BTM by LB Richmond (Appendix 2). The Site is not situated within a conservation area, however Queens Road, Mortlake Conservation Area abuts the Site to the west.
- 3.4 The existing Site accommodates a number of buildings, which historically provided mental health facilities. The remainder of the Site is occupied by hardstanding providing car parking and some soft landscaping located outside a number of the buildings. There are a total of 3 existing entrances into the site from South Worple Way which provides access to the various parking bays and buildings.
- 3.5 Photographs of the existing buildings can be found in the supporting Design and Access Statement.
- 3.6 The Site hosts a number of trees protected by Tree Preservation Orders. The site is classified as being within Flood Zone 1, and so is not affected by sources of flooding. The site has a Public Transport Accessibility Level of 2. Vehicle and pedestrian access to the site is provided from South Worple Way.

Site Planning History

- 3.7 A detailed search of the Council's online planning records has been undertaken for the site and a limited number of results were produced. Details of a relevant applications is set out below.
- 3.8 The Trust applied to the Council for a certificate of lawful use for existing development (CLEUD) in June 2018 (ref: 18/1883/ES191) to establish the existing use of the site as C2. This conclusion was reached on the basis that the Site has been used for the provision of long-term residential care of those needing enhanced mental health care, with a particular focus on elderly residents. In August 2018 the Council issued a CLEUD to confirm that the site's lawful use is C2.

4.0 THE PLANNING APPLICATION

The Proposal

4.1 The planning application seeks outline planning permission with all matters reserved, save for details of access points at the site boundaries.

4.2 The site currently consist of a number of buildings which were formally in use as a mental health hospital (Use Class C2). The only buildings currently in active use on the site are Beatrice Lodge and Garden House.

4.3 The Proposed Development seeks planning permission for:

“Outline planning permission for the demolition and comprehensive redevelopment (phased development) of land at Barnes Hospital to provide a mixed use development comprising a health centre (Use Class D1), a Special Educational Needs (SEN) School (Use Class D1), up to 80 new build residential units (Use class C3), the conversion of two of the retained BTMs for use for up to 3no. residential units (Use Class C3), the conversion of one BTM for medical use (Use Class D1), car parking, landscaping and associated works. All matters reserved save for the full details submitted in relation to access points at the site boundaries”.

4.4 The development will realise the comprehensive redevelopment and regeneration of the Site to create:

- A SEN school for up to 90 pupils (up to 2,402 sqm);
- A state of the art medical centre (up to 2,500 sqm), which will include an element of mental health floorspace;
- The retention of 3 Buildings of Townscape Merit (BTM) of which two are to be converted into 3 residential units and the other into healthcare floorspace;
- 90 new build residential units, of which a percentage will be affordable; and
- The provision of 1,004 sqm of publically accessible public space;

4.5 The Proposal will provide a total of 81 car parking spaces across the site, distributed as follows:

- Health hub, 26 spaces including 4 accessible spaces;
- SEN school, 11 spaces; and
- Residential, 44 spaces located within the basement, including 5 disabled spaces.

4.6 In terms of cycle parking, the total amount proposed is:

- Health hub, 27 spaces including 17 short stay;
- SEN school, 26 spaces including 18 short stay; and
- Residential, 147 bays including for short stay provision.

- 4.7 Full details of the car and cycle parking arrangements will be set out at the reserved matters stage.
- 4.8 The planning application is made in outline, apart from means of access into the site. All other matters (appearance, landscaping, layout, scale and access around the site) are reserved and are to be dealt with under a subsequent reserved matters application for later determination. The proposed strategy for vehicle access is to widen the existing vehicular access points from South Worple Way to enable to-way vehicle access to the site simultaneously. The western access will be for residential use only, with the eastern access exclusively for the SEN school and health hub uses. The central access will be set aside for pedestrian and cycle access to the community and residential uses.
- 4.9 With regard to appearance and landscaping, the illustrative design set out within the Design and Access Statement submitted in support of the application, shows one way in which the development could be brought forward within the parameters set. This approach, whilst allowing control over subsequent reserved matters, also allows for a degree of flexibility in the final design so that the scheme can evolve over time to take account of relevant factors including funding streams in relation to the SEN school and the medical centre. It is noted that the Department for School Planning of Kingston and Richmond have submitted an application to the Education Funding Authority (EFA) for funding for a 90 pupil SEN school designated for children and young people with Social, Emotional and Mental Health needs at Barnes Hospital, and it is anticipated that the EFA are to announce which boroughs were successful late 2018 / early 2019.

Parameter Plans (Submitted for Approval)

- 4.10 Parameter Plans are submitted for approval as part of this application for outline planning permission. Adopting a 'parameters approach' allows for a degree of flexibility with regard to the detailed design of the development, whilst ensuring that the supporting technical assessments are appropriate and robust.
- 4.11 It is envisaged that conditions will be imposed on any planning permission requiring the reserved matters applications to be in accordance with the Parameter Plans.
- 4.12 The Parameter Plans are prepared by Squire and Partners and submitted for approval are as follows:
- Demolition Plan;
 - Proposed Site Levels;
 - Proposed Plot Use;
 - Proposed Maximum Storey Heights;
 - Maximum Building Extents;
 - Pedestrian and Cycle Access;

- Public Realm and Landscaping;
- SEN School Option 2 – Proposed Building Uses;
- SEN School Option 2 – Proposed Maximum Storey Heights;
- SEN School Option 2 – Maximum Building Extents;
- SEN School Option 2 – Pedestrian and Cycle Access;
- SEN School Option 2 – Vehicular Access;
- SEN School Option 2 – Public Realm and Landscaping; and
- Maximum Basement Extents.

4.13 These plans set out the parameters in which the subsequent reserved matters applications are brought forward.

Plans for Approval

4.14 Further plans are submitted with the application for approval:

- Site Location Plan;
- Existing Site Levels;
- Existing Building Heights;
- Eastern Site Access;
- Pedestrian Site Access; and
- Western Site Access.

Supporting Plans

4.15 A series of other plans are submitted in support of the application which include:

- Illustrative masterplan;
- Illustrative roof plan; and
- Indicative site layout.

Technical Supporting Documents

4.16 In addition, a range of technical documents are submitted to support the application. The documents report on the findings of various surveys undertaken to test the Proposal's acceptability against potential impact, to identify a need for mitigation and potential opportunities, and inform the design. These submissions have been informed by and reflect discussion with the Council during the pre-application process, as well as by the Council's validation checklist. The technical support documents submitted alongside this Statement are:

- Design and Access Statement;
- Health Impact Assessment;
- Heritage Statement;
- Residential Standards Checklist;
- Statement of Community Involvement;
- Transport Statement;
- Travel Plan;
- Delivery and Servicing Plan;
- Construction Management Plan;
- Flood Risk Assessment;

- Contaminated Land Assessment;
- Energy Report;
- Noise Assessment;
- Air Quality Assessment;
- Ecology Report;
- Archaeology Assessment;
- Viability Assessment;
- Marketing Report;
- Arboricultural Impact Assessment; and
- Daylight and Sunlight Assessment.

Pre-Application Discussions

- 4.17 The Proposal has been developed in full consultation with officers and members of the London Borough of Richmond, key stakeholders and the community during pre-application discussions. This has involved consultation on matters such as design, transport, BTMs and layout. This approach has been supported by a series of pre-application meetings with the Council in the lead up to submission. The meetings have allowed matters and opportunities to be discussed, such as use, building heights design and parking provision, leading to a refined Proposal.
- 4.18 Pre-application discussions began on the site in 2017, looking at the proposed uses on the site, bulk, massing and layout. Since this initial pre-application process further discussions have been had in 2018, in light of confirmation of the SEN school requirements therefore enabling the site to come forward with a comprehensive masterplan.
- 4.19 A summary of the meetings held and outcomes achieved is presented within the Design and Access Statement submitted as part of this application.

Community Engagement

- 4.20 The Applicant has undertaken an extensive community engagement exercise through holding public exhibitions during November and December 2017 and two further exhibitions on 27 September and 29 September 2018. The exhibitions were held on-site within Garden House.
- 4.21 The exhibitions were publicised through a leaflet drop around the site, with invitations sent out to local residents and forums in the Borough. The exhibitions allowed the Application to show the local community the Proposal and impart its vision and intentions for the area. The 2018 exhibitions were well attended by 95 people made up of local residents and other stakeholders all with an interest in the site.
- 4.22 Overall the exercise revealed general support for the Proposal with a total of 29 comments received, many of which were positive. A number of recurring themes were raised, which are summarised as follows:
- 50% of respondents supported the proposals for the redevelopment of the site, with only 13% of respondents stating that they did not support the proposals;

- 88% of respondents ranked the delivery of modern world-class health services for Richmond as very important or important; and
- 86% of respondents ranked the provision of a new SEN school as very important or important.

4.23 A record of comments is provided in the Statement of Community Involvement submitted as part of this application. Feedback will be incorporated into the design at reserved matters stage.

5.0 PLANNING POLICY FRAMEWORK

5.1 The application has been developed in accordance with adopted development plan policies, and other relevant guidance and material considerations.

5.2 This section provides a summary of the planning context and Section 6 provides an assessment of the application against the policies and guidance contained within these documents.

Statutory Framework

5.3 Section 70 of the 1990 Town and Country Planning Act requires planning applications to be determined in accordance with policy of the statutory Development Plan, unless material considerations indicate otherwise.

5.4 However, Section 14 of the National Planning Policy Framework (NPPF) states that where the Development Plan is absent, or silent, or where relevant policies are out of date, presumption should be in favour of sustainable development and planning permission should be granted, unless material considerations indicate otherwise.

The Statutory Development Plan

5.5 The London Borough of Richmond upon Thames's current Development Plan consists of the following documents:

5.6 The statutory Development Plan relevant to the Site and this assessment comprises:

- The London Plan (2016); and
- The Richmond Local Plan (2018).

Emerging Planning Policy

Draft New London Plan

5.7 The Mayor of London is in the process of preparing a new London Plan to replace the adopted Plan. Informal consultation on the first iteration of the document was undertaken between October and December 2017. A public draft of the new London Plan was published on 29 November 2017 and a six week consultation took place from 1 December 2017 until 2 March 2018.

5.8 An Examination in Public (EiP) on the document is expected to take place in November 2018. The final version of the new London Plan is anticipated to be adopted in Autumn 2019. The policies contained within the draft are still to undergo revisions following the EiP and therefore are of limited weight. It does however provide a clear indication as to the direction of travel towards optimising development

of previously developed land and in supporting the public sector health estate in ensuring a viable future.

Other Material Planning Considerations

National Guidance

5.9 The revised National Planning Policy Framework (NPPF) came into force on 24 July 2018. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in the determination of all planning applications.

5.10 At the heart of the NPPF is a presumption in favour of sustainable development, (paragraphs 10 and 11). The presumption in favour of sustainable development which is set out in the Framework indicates that where this test is met, applications should be approved without delay. Paragraph 11 goes on to state that:

"For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

5.11 In March 2014 the Government published the Planning Practice Guidance (PPG) which is a material consideration to planning applications. The PPG is an online resource which replaces a number of previous circulars and guidance to provide a simplified single source of guidance at national level.

Regional Guidance

5.12 The Mayor of London has also published a number of supporting documents that are relevant in the consideration of this application. Of particular relevance are:

- Mayors Affordable Housing SPG.

Local Guidance

5.13 The London Borough of Richmond upon Thames has a number of adopted and emerging supplementary policy documents which are a material consideration in respect of the applications including:

- Queens Road, Mortlake Conservation Area Statement and Study;
- East Sheen Village Planning Guidance;
- Design Quality SPD;
- Planning Obligation Strategy SPD;
- Sustainable Construction Checklist;
- Front Garden and Other Off Street Parking Standards;
- Refuse and Recycling Storage Requirements; and
- Small and Medium Housing Sites.

Planning Designations

5.14 The site is allocated within The Local Plan (2018) site allocation SA 28. The allocation states:

“It is acknowledged that the mix of uses on this site will depend on the Mental Health Trust’s decision on how much of the site they need to retain for their own future needs.

There is a clear need for a new Special Education Needs school in this area as set out in the Council’s updated School Plan Planning Strategy. Therefore, the council expects any redevelopment proposals to prioritise the provision of the educational use.

Appropriate land uses include social and community infrastructure use (including education). The possibility of location primary and / or community health services on this site should be investigated.

Only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option.....”

5.15 The site is not located with a conservation area, nor does it contain any statutory listed building but it does have 8 buildings of townscape and merit and a number of trees are covered by a Tree Preservation Order.

6.0 PLANNING APPRAISAL

Introduction

- 6.1 Within this section we assess the proposed development against the statutory development plan and other material considerations as identified in Section 5 of this Statement.

Principle of Development

- 6.2 The Site consists of a number of hospital buildings (Use Class C1), of which a number except for Garden House and Beatrice Lodge, are vacant and have been for a prolonged period. As set out in paragraph 3.86 of the London Plan and local policy health facilities, such as the existing use on the site, are defined as 'social infrastructure'.
- 6.3 The proposal seeks permission for a mixed-use scheme which retains a number of community uses across the site to include a new medical centre (use class D1) and a 90 pupil SEN school (use class D1) with a portion of the site being converted to residential (use class C3).

Loss of Part of the Site from a Community Use

- 6.4 Section 8 of the NPPF is concerned with promoting communities and resists the loss of community facilities where this would "*reduce the communities' ability to meet its day-to-day needs*".
- 6.5 London Plan Policy 3.16B sets out that development proposals 'which provide high quality social infrastructure will be supported in light of local and strategic infrastructure needs assessment' and further goes on to set out that the 'suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a designated need in the locality should be assessed before alternative developments are considered'.
- 6.6 Paragraph 3.87A goes on to state that the:
- "loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure provision (in health and community safety, for example) to ensure continued delivery of social infrastructure and related services"*.
- 6.7 Emerging London Plan holds limited weight at this stage but it is noted that the current drafting reinforces the current London Plan position as emerging policy S1 part F states:

“Development proposals that would result in a loss of social infrastructure in an areas of defined need should be refused unless:

2. the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services”.

6.8 In addition emerging paragraph 5.2.9 states that:

“Development and regeneration proposal for an area provide an opportunity to re-think how land and buildings are used and where there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities..”.

6.9 Local Plan Policy SA28 allocates the site for comprehensive development to provide social and community infrastructure facilities in the Borough, explicitly setting out the requirement for a SEN school in this location. The policy goes on to state that ‘only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable) and the potential for extra-care housing be considered as a potential redevelopment option.

6.10 In line with the Local Plan allocation The East Sheen Village Supplementary Planning Document (SPD) considers that the site is appropriate for a mixed use development to include residential, including affordable units and social infrastructure. Priorities identified for the social infrastructure component include health and education facilities. The SPD encourages proposals to consider:

- The protection and enhancement of the existing character of the site and its positive contribution to the area and adjacent Queens Road Mortlake Conservation Area;
- The retention and reuse of the BTMs;
- The retention of the boundary wall to South Worple Way;
- The retention and protection of existing mature trees subject to Tree Preservation Order
- Enhancing the biodiversity of the site and adjacent cemetery;
- Density, layout and height of buildings to be in keeping with the character of the area; and
- Minimise and mitigate impact on the local highway network, and in particular the impacts on the junction with White Hart Lane and ensure a safe pedestrian environment.

- 6.11 Local Plan Policy LP28 sets out that the loss of social or community infrastructure will be resisted unless it can be clearly demonstrated that the criteria set out in the policy can be demonstrated.
- 6.12 The existing site accommodates approximately 6,950 sqm of very in-efficient and dated floorspace which is not fit for continued health care purposes or accommodating a SEN school, as desired in the site allocation. The proposed scheme is seeking, through the health centre and SEN school, 4,855 sqm of useable, purpose built floorspace. The proposal will result in the loss of 2,095 sqm of floorspace. However, in terms of overall site area the proposal is seeking:
- Health hub (0.3 ha – 3,000 sqm) (21% of site area);
 - SEN School (0.3 ha – 3,285 sqm) 23% of site area);
 - Open Space (0.1 ha – 1,004 sqm) (7% of site area); and
 - Residential (0.7 – 7,056 sqm) (49% of site area).
- 6.13 Therefore, 44% of the site will be retained as purpose built, utilised community uses, which will be retained which adheres with the aspiration of policy.
- 6.14 In light of the sites allocation (SA28), policy LP28 and LP 30 it is considered that the provision of enhanced community facilities on the site in the provision of a new medical centre (Use Class D1) and 90 pupil SEN school is acceptable in principle, subject to adherence to other policies in the plan.
- 6.15 As set out in Section 2 the Trust have undertaken a detailed analysis and consultation process of their estate to ensure that the Trust is providing services across south west London.
- 6.16 To justify the loss of part of the site from community use, as set out in Local Plan policy SA28, a detailed response to each of the Local Plan policy LP28 considerations have been set out below to demonstrate that the loss of part of the site from community use to residential to enable enhanced on site community facilities whilst achieving best value to facilitate the wider Estates Modernisation Programme is acceptable, which fully adheres to the aspirations of the adopted and emerging London Plan.

Social and Community Infrastructure - The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

- 6.17 At present the site is underutilised and currently does not effectively serve the needs of the local community. The scheme seeks to rationalise the site and optimise the community facilities, whilst creating receipts that go towards the strategic EMP.
- 6.18 As set out in detail above, London Plan policy reflects the strategic requirement for healthcare across greater London and facilitates the loss of social infrastructure where it can be clearly demonstrated that the receipts received are going towards a programme of infrastructure provision, which is the case at Barnes Hospital.

- 6.19 The scheme proposes that approximately 51% of the site is retained as a community facility in the form of a health hub, an SEN school and public accessible open space.

New social and community infrastructure - B. Proposals for new or extensions to existing social and community infrastructure will be supported where:

1. it provides for an identified need;

- 6.20 The above EMP strategy justification in terms of the Trust providing a programme of strategic infrastructure improvements, at Springfield and Tolworth is relevant in relation this policy requirement. As detailed in Section 4, the Proposal is for a new health hub and a SEN school with a portion of the site being redeveloped for housing. In addition, the centre of the Site is proposed as a 'green square' which will be publically accessible to not only users of the site but the wider community.

- 6.21 This will equate to 4,922 sqm of useable and enhanced social and community floorspace proposed on the site, which is in line with Policy LP28.

2. is of a high quality and inclusive design providing access for all; and

- 6.22 This application is seeking outline permission and so the detailed design of the scheme will be subject to reserved matters. However, in line with all levels of policy high quality and inclusive design will be promoted. This is manifest in the Design Codes submitted as part of this application which demonstrates that the proposed new buildings will introduce high quality architecture to enhance the local character and appearance, taking into consideration the retained buildings of merit and the adjacent conservation area.

3. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

- 6.23 As set out under the other sections above, the proposed scheme is to provide enhance social infrastructure by seeking permission for a new medical centre, SEN school and publically accessible amenity space.

- 6.24 The existing use on the site is no longer fit for purpose for use by the Trust and has been declared surplus. The existing buildings are not fit for purpose for adapting to the modern demands of healthcare and do not utilise the Site.

- 6.25 The provision of the SEN school, medical centre and publically accessible open space will increase public access to community facilities in light that the existing hospital use is surplus to requirement with the majority of the site currently being vacant and not providing any community benefit.

- 6.26 As discussed in detail above, the receipts from this site are fundamental in enabling the Trust to deliver their Estate Modernisation Programme to provide state of the art facilities and care to South West London.

Loss of social or community infrastructure - C. Loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:

1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or

- 6.27 The Site has been underutilised for some time, with large parts the site not in use since 2012 when a number of wards were moved to improve the services that are offered to patients.

- 6.28 The Barnes site will retain an element of local health care within the Richmond area but will also secure receipts that will enable the delivery of the wider EMP.

- 6.29 As set out above, London Plan, paragraph 3.87A states that where there is a need for social infrastructure it can be acceptable to dispose of land provided that the receipts are invested in the public service. The draft London Plan explicitly refers to health facilities as one such situation where this would be appropriate.

- 6.30 The scheme proposes that in excess of 50% of the site is redeveloped to provide quality, usable community facilities in the form of a medical centre which will meet the needs of the local community, a 90 pupil SEN school and publically accessible open space.

- 6.31 As detailed in Section 2 the Trusts EMP will enable the Trust to modernise facilities serving south west London. The Barnes site is a critical component of the Trusts overall Business Case which has been submitted to the Department of Health both in terms of maintaining an element of local health care within the Richmond area but also by way of securing receipts that will enable the delivery of the wider EMP.

2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and

- 6.32 This site falls within the Trusts wider modernisation strategy which will deliver two new state of the art hospitals and a range of community based healthcare services. The two new campus facilities at both Springfield and Tolworth will serve people within Richmond with state of the art facilities and services.

- 6.33 In addition to the two new hospitals, the proposed scheme at Barnes proposes a new health centre which will include up to 2,500 sqm of new medical floorspace which, as set out in Section 2, will ensure that the Trust is able to continue providing much needed services to South West London.

3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5.

- 6.34 A detailed overview of the Trusts marketing process for the site is submitted as part of this application. However in summary prior to commencement of the public marketing campaign outlined below, the Site was listed as available for sale on the Electronic Property Information Mapping Service (e-PIMS™). e-PIMS is the central database of Government Central Civil Estate properties and land. It records the precise location of property, along with information such as landlord details, lease data and usage.
- 6.35 The Site was first listed on e-PIMS in August 2016 as surplus to requirement and has remained on there since. The listing has generated no interest from other public sector bodies.
- 6.36 In light of the e-PIMS listing generating no interest from other public sector bodies, the Trust instructed Savills to initiate a marketing strategy that sought to achieve a successful disposal in line with its objectives.
- 6.37 On 20th January 2017, approximately 4 months after listing the Site as surplus on e-PIMS, the opportunity was circulated by email to more than 2,900 parties on Savills' database. On 21st January 2017 the opportunity was advertised in the Estates Gazette and simultaneously listed on the Savills and Estates Gazette websites.
- 6.38 Whilst considerable time has passed since the marketing process was undertaken and then subsequently aborted, it is noted that the Site has remained listed on ePIMS as available for disposal. No interest has been generated from the ePIMS listing throughout this period. Conversely, intermittent interest has been received from the private sector but not offers have been submitted.

D. Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered.

- 6.39 The application is seeking provision for residential accommodation, Use Class C3, which is supported as an alternative land use by part D of Policy LP28. The general acceptability of the residential component of the development is discussed below.

Impacts on existing social infrastructure - E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient

capacity within the existing infrastructure to accommodate the needs arising from the new development.

- 6.40 This application is seeking permission for C3 residential accommodation and is supported by a Health Impact Assessment as sought by policy. The Health Impact Assessment submitted in support of this application demonstrates that the proposed and retained health facilities meet the resident's needs and that there is sufficient capacity within the existing network to accommodate the needs arising from the Proposal.

Summary

- 6.41 Overall, the Proposed Development makes an effective use of a strategic brownfield site in the Borough. The proposal is seeking to rationalise and substantially improve the community facilities at the site site by the provision of a new medical health centre and a 90 pupil SEN school. Approximately 51% of the site is to be retained as community use which is wholly consistent with adopted and emerging planning policy.
- 6.42 As clearly justified against National, Regional and Local Planning Policies there are clear and robust justifications for a portion of the site to be developed for an alternative use.

Proposed Residential Use

- 6.43 In addition to the health hub and SEN school, the Proposal will deliver up to 83 residential units across a range of tenures and sizes. This will help secure a supply of housing to encourage mixed communities, and contribute towards policy objectives regarding housing delivery.
- 6.44 The NPPF sets out the Government's objectives for development to deliver sustainable and mixed use communities in accessible locations. National Policy advises that a variety of housing should be provided in terms of tenure and price together with a mix of unit sizes.
- 6.45 Policy 3.3, the London Plan recognises the need for more houses in London to contribute towards the boroughs' housing targets through the release and intensification of brownfield land. The adopted Local plan target for the London Borough of Richmond is 3,150 between 2015-2025 with an annual target of 315 units.
- 6.46 Under the draft London Plan, a far greater emphasis is placed on Richmond to deliver housing numbers. Policy H1 increases Richmond's annual ten year housing target to 4,424, which equates to 811 dwellings per annum, which is a significant increase above the adopted position, reflecting the Mayor's core objective to overcome the capital's housing crisis through a growth strategy that includes the intensification of brownfield sites, in accessible locations areas.
- 6.47 As detailed in the previous section adopted Local Plan policy SA 28 states that residential use would be considered as an alternative use for the site that was not

being retained for rationalised, fit for purposes community and social infrastructure uses, which the above section demonstrates.

- 6.48 The Proposal would directly contribute towards the strategic housing requirement set out in the London Plan and should be supported in principle. Whilst the layout of the housing development is a reserved matter, the proposed parameter plans define the development areas on-site. The illustrative layout plans show how a housing development could be accommodated within these parameters whilst providing a mix of units, which exceed the national space standards, provide sufficient parking in line with standards and the provision of amenity space for individual dwellings.
- 6.49 In accordance with the Development Plan and the NPPF it will provide for high quality housing which accords with relevant standards and makes most efficient use of the site in a manner that is appropriate to the location.

Density

- 6.50 The Site demonstrates a PTAL rating of 2, however, as set out in the Transport Statement a review of the WebCAT PTAL output report it is evident that the analysis does not include consideration of all pedestrian routes in the vicinity of the site or the proposed footbridge across the railway line. This underestimates the PTAL score and public transport accessibility of the site. The true PTAL rating of the site is 4, as evidenced in the Transport Statement, which signifies that the Site is inherently suitable to accommodate housing growth of this nature.
- 6.51 In line with London Plan Table 3.2 (Density Matrix) the Site falls within an 'Urban' location, which is detailed as an area with 'predominately dense development such as, for example, terraced houses, mansion blocks, a mix of different use, medium building footprints and typically buildings of two to four stories...'.
- 6.52 The proposed scheme is proposing a density of 56 units per hectare, which is in line with the density level proposed in the London Plan Matrix.

Mix

- 6.53 Policy 3.8 of the London Plan and Local Plan Policy LP35 seeks new development to provide a range of housing choice in terms of mix and types and that the housing mix should be appropriate to the site-specifics of the location.
- 6.54 The proposed scheme will provide for up to 83 units (including three in the converted BTMs). The proposed unit mix is set out below within Table 6.1.

Unit Mix	Amount	Percentage
1-bed	31	37%
2-bed	37	45%
3-bed	15	18%
TOTAL (including BTMs)	83	100%

6.55 Having regard to the location of the site and character of the development this mix is considered to be appropriate within the context of Policy LP35.

Affordable Housing

6.56 The NPPF advocates the need for councils to be flexible in the application of planning obligations to ensure that schemes are not at risk of being delayed or abandoned.

6.57 In line with the Mayor's Affordable Housing SPG, which sets out the expectation for developments involving the disposal of public land to deliver 50% affordable housing, Local Plan Policy LP36 sets out that, subject to viability, Richmond expects 50% of new homes borough-wide being affordable and of this 50% being a mix of 40% social rent and 10% intermediate.

6.58 The Proposal will deliver an element of affordable housing, subject to viability, to meet local needs and support balanced communities.

6.59 In line with policy LP36 part D a development appraisal has been submitted as part of this planning application.

Design

6.60 The Proposed Development has been carefully considered based on an in-depth understanding of the existing site, its surroundings and its future vision. The Design and Access Statement explains the design evolution of the Proposal, based on an iterative approach, how it interacts with and responds to its surrounding context, and provides an overall justification of the design.

6.61 High quality design is at the forefront of policy requirements through the spine of national and local policy. The NPPF, under paragraphs 124 and 126, notes that creating high quality buildings and places is fundamental to the planning and development process.

6.62 This is reinforced by the London Plan, which also requires architecture to complement local architectural character under Policy 7.6. The Local Plan, under Policy LP1 sets out principles for development and design and requires proposals to be visually attractive, fit for purpose and locally distinctive. Design must also be sensitive to the surrounding buildings, land and topography.

6.63 The proposals are set out on the Illustrative Masterplan, which demonstrates that a policy compliant scheme is achievable. They have been carefully considered to

ensure that the design of the scheme creates a high quality environment whilst respecting the residential context surrounding the site and Conservation Area to the west.

6.64 The design strategy has sought to address a number of key issues in relation to townscape, which seek to ensure that the development respects and enhances its context and is compatible with the scale and character of its setting. Key issues have included:

- Proposed land uses, their distribution and integration with adjoining existing uses;
- Ensuring quality design and sensitive location of compatible land uses;
- Ensuring sustainability is a central component of the design rationale;
- Providing adequate parking and separate vehicle accesses for residents and the school and health hub;
- Creating improved pedestrian links for site users;
- Providing high quality open space and public realm; and
- Promoting sustainable transport modes through safe cycle and pedestrian routes and cycle parking provision.

6.65 The accompanying Parameter Plans specify the parameters to inform detailed design proposals to be brought forward at a later date. They determine the maximum building heights and floorspace as well as the distribution of land uses across the site. An outline landscaping strategy is also contained in the Design and Access Statement.

6.66 The Illustrative Layout shows the configuration of uses across the site, which is underpinned by the Parameter Plans that have been developed to show areas within the site for which consent for specific use classes is sought. This will allow flexibility over the configuration of operational uses to be dealt with at reserved matters stage.

6.67 In respect of land use, residential uses are located in the western area of the site, set out in a perimeter block arrangement. A large green space is located centrally within the blocks. The remainder of the site is proposed for community facilities. The health hub is proposed for the north eastern plot fronting South Worple Way, with the SEN school situated adjacently southwards of this. Both community uses are provided with separate parking areas.

6.68 The Proposal utilises the existing vehicular access points for the site from South Worple Way which will be widened to enable to-way vehicle access to the site simultaneously. The western access will be for residential use only, with the eastern access exclusively for SEN school and health hub uses. The central access will be set aside for pedestrian access to the residential and community uses. Internal road layouts are shown that have been tested for vehicle movements and will ensure safety for motorists, cyclists and pedestrians alike. Only the site vehicle access points are submitted for detailed consent under the application.

- 6.69 The maximum storey heights for each proposed use:
- Residential: 2.5 storeys with a maximum building height of 10.3m;
 - SEN school: part 2, part 3 storeys with a maximum building height of 9.5m; and
 - Health hub: 2 storeys with a maximum building height of 7.2m.
- 6.70 The above is considered acceptable for the floorspace and massing requirements of the proposed health and residential uses, whilst insuring that the buildings respond positively to its neighbouring context and is not overbearing or detrimental to residential amenity. The footprint of the buildings have also been sited to ensure adequate separation between buildings and from adjoining occupiers, which will be further softened by the extent of existing and proposed landscaping.
- 6.71 The massing of the proposed buildings has also been configured to maintain a minimum 13.5m separation between blocks as sought by paragraph 4.8.8 of the Local Plan.
- 6.72 The site layout has been based on a strong understanding of the Site's physical constraints and surrounding uses, existing and proposed. This has led to a Proposal which complements its context, safeguards existing buildings on-site and optimises floorspace and parking provision.
- 6.73 At this design stage, it is considered that the Proposal complies with the NPPF and Development Plan, in that it is fit for purpose and integrates with local townscape and the wider context. Furthermore, the Proposal, by provision of Parameter Plans and the Illustrative Masterplan, presents a platform for the detailed design in ensuring high quality design. The Proposal also demonstrates compliance with LP 35 in respect of the proposed standard of accommodation and Building Regulation requirements.

Transport, Access and Parking

- 6.74 In respect of transport, the London Plan under Policy 6.3 requires proposals to ensure that impacts on transport capacity and the transport network are fully assessed. Policy 6.13 relates to parking and seeks to minimise excessive car parking provision in favour of public transport, cycling and walking.
- 6.75 This is supplemented by Local Plan Policy LP44 which requires proposals to demonstrate that the Proposal can be accommodated within the highway network and to implement measures to ensure the delivery of travel choice and sustainable opportunities for travel. Local Plan Policy 45 requires the submission of a Travel Plan for major development proposals. It goes on to say that the Council requires proposals to seek improvements to walking and cycling facilities and networks.
- 6.76 In order to test the Proposed Development's potential impact on the public highway, and to mitigate its impact where appropriate, a Transport Assessment and a

Framework Residential Travel Plan and Framework Workplace Travel Plan have been prepared to support the application.

6.77 The Proposal will provide a total of 81 car parking spaces across the site. The proposed level of car parking is compliant with the LB Richmond's maximum vehicle parking space standards. The proposed number of car parking is considered acceptable considering the proximity of the site to public transport facilities and the forthcoming CPZ that has been approved in the surrounding streets, therefore ensuring that overspill parking does not occur from the site. The breakdown of parking against the proposed land uses is as follows:

- Health hub, 26 spaces including 4 accessible spaces;
- SEN school, 11 spaces; and
- Residential, 44 spaces (0.5 spaces per unit) located within the basement including 10% accessible units.

6.78 In terms of cycle parking, the total amount proposed is:

- Health hub, 27 spaces including 17 short stay;
- SEN school, 24-26 spaces including 18 short stay; and
- Residential, 132 bays including for short stay provision.

6.79 The Transport Assessment demonstrates that the proposed access points from South Worple Way are suitable and that the development is acceptable in terms of traffic generation and highway safety. It also demonstrates that the site is a sustainable location for the proposed housing and community uses and that the development would accord with the Council's adopted parking standards. The Transport Assessment also identifies that there will be a beneficial reduction in vehicle movements when considered against the site's historic use as a hospital.

6.80 The Travel Plans defines the site-wide strategy for ensuring the delivery of travel choice and lists a package of measures to promote walking, cycling and public transport. This will seek to reduce car dependency over time for both the community uses and residential component of the scheme. A Delivery and Servicing Management Plan is also provided to outline the servicing strategy. This demonstrates that the deliveries and servicing activity associated with the Proposal can be carried out in a safe and efficient manner and that the impact of this activity is kept to a minimum. On this basis, the application is considered acceptable in highways terms in line with the Development Plan and associated standards and the NPPF.

Open Space Assessment

6.81 In order to support the future use of the site, the provision of open space has been a central component of the development strategy. This is a core tenet of the NPPF, which seeks to sustain an appropriate amount of open or green space to support local communities. The London Plan prioritises the provision of play and recreation

facilities based on the expected child yield of the development. Policy LP31 of the Local Plan controls the provision of open space, play space and sports pitches at the Borough-level. The Council will require all major development proposals in the borough to meet the open space needs arising from the development either through dedicated provision or financial contribution where this can not be achieved.

6.82 In respect of existing provision, the site is located in proximity to a number of existing open spaces, including Barnes Common. The site meets the Council's accessibility standards for open space, as set out in the Council's Open Space Assessment. This establishes that there is adequate existing provision and access to such facilities within 15 minutes walking distance.

6.83 Notwithstanding this, the Proposal provides extensive areas of publically accessible open space that provides dedicated resource for the residents and general public. Linear planting and landscaping is also proposed between the blocks, to provide additional amenity space for residents. In combination this serves to mitigate any pressure on the capacity of the existing provision.

6.84 In respect of play space, an assessment of child occupancy has been made to calculate the estimated child occupancy using the Council's adopted SPD. This identifies an estimate of 33.1 children that could occupy the residential development once constructed, which would equate to 340 sqm of play space. The location and nature of this play space would be determined at reserved matters stage, but could take the form of landscaped areas with equipment.

Health Impact Assessment

6.85 The NPPF (paragraph 92) explicitly promotes an integrated approach to the location of housing and community facilities and services to support a healthy population and plan positively for the provision and use of community facilities.

6.86 Policy 3.2 of the London Plan considers that major development proposals should consider the impacts on the health and wellbeing of communities. Policy LP30 of the Local Plan notes that the Council supports development that promotes health and wellbeing. It reinforces the London Plan position by requiring major development proposals to be supported by a Health Impact Assessment, which assesses the health and wellbeing impacts of the Proposal.

6.87 The Health Impact Assessment submitted in support of this application concludes that the Proposal provides a number of positive effects on the health and wellbeing of the borough residents, including the provision of a health hub and extensive areas of open space. This demonstrates that the Proposal is compliant with relevant policy initiatives.

Sustainability and Energy

- 6.88 The NPPF explicitly promotes sustainable development as a core planning objective. The London Plan (Policy 5.2) and Local Plan (Policy 22) both require proposals to demonstrate how the energy hierarchy has been applied to promote renewable and low carbon development. Policy LP17 promotes green and brown roofs where feasible and subject to visual impact. The Proposals target compliance with the Development Plan and this will form a central component of the detailed design stage. The outline strategy for achieving this is contained within the Sustainability Report submitted as part of this application.

Hydrology and Flooding

- 6.89 The London Plan (Policy 5.13) prioritises locating development in locations at lowest risk of flooding as per paragraph 155 of the NPPF. Policy 5.13 requires development to utilise SUDS to manage surface water effectively. Local Plan Policy LP21 expects development to demonstrate that the Proposal would reduce the overall and local risk of flooding and to demonstrate that they are adequately defended and safe over their lifetime. In regards to drainage, as a minimum, surface water run-off must have no greater adverse impact than the existing use.
- 6.90 The Site comprises Flood Zone 1 land and so is considered to be at low risk of flooding from river sources. A Flood Risk Assessment, including drainage strategy, is provided which assesses the direct impacts of the Proposal on increased flood risk, surface water runoff, foul water drainage and groundwater.
- 6.91 The FRA has found that flood risk from all sources of flooding is low, therefore making the site suitable for development. In terms of drainage, the FRA confirms that the Proposal will lead to improvements in surface water drainage as this will be comprehensively provided for via underground attenuation tanks. The findings of the FRA demonstrate the Proposal is to be acceptable on hydrology and drainage matters and thus is in line with policy requirements, full details will be included at reserved matters stage.

Heritage Assessment

Structural

- 6.92 The NPPF, under paragraphs 189-190, requires proposals to assess the significance of any heritage asset that might be affected, to avoid conflict with the heritage asset's conservation. Policy 7.9 of the London Plan notes that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant thus helping stimulate regeneration.
- 6.93 Policy LP 4 states that there is a presumption against the demolition of Buildings of Townscape Merit, of which there are 8 on site. The supporting text of Policy LP 4 goes on to state that there is a presumption against the demolition of a BTM unless

structural evidence is submitted to the Council. Presumably, the structural evidence is requested on the assumption that the demolition of the BTM is required because of an issue with their structural integrity.

6.94 In accordance with the wording of SA 28, the most important BTMs on the Site will be retained. The most important buildings have been identified as the buildings from the Edwardian phase of development because they are the most intact physically and as a group. They are also located at the main entrance from the Site and therefore make the most contribution to the local townscape.

6.95 It is considered that the selection of buildings to be demolished is appropriate in terms of the balanced judgement on their significance. The retained BTMs are located adjacent to residential Block A, but Block A maintains a respectful separation to ensure a positive relationship is maintained. The proposals are therefore acceptable in the terms of paragraph 197 of the NPPF and policies LP 4 and SA 28 of the development plan.

Conservation Area

6.96 As set out in the submitted Heritage Statement an assessment has been undertaken of the proposal on the effect on the Queens Road (Mortlake) Conservation Area. The Site forms the immediate setting to the east of the burial ground, but there is no historical, design or architectural relationship between the Conservation Area and the Site.

6.97 The Statement considers views in and out of the Conservation Area, which are limited by the extent of dense perimeter planting within the cemetery. Overall, the Proposal is considered to enhance the setting and significance of the Conservation Area and thus complies with the NPPF and Development Plan.

Archaeology

6.98 The NPPF (paragraph 189) requires proposals on land that has the potential for archeological interest to submit a desk-based assessment. This is consistent with the London Plan and Local Plan, in Policy 7.8 and Policy LP3 respectively to establish the site's archaeological potential.

6.99 In order to satisfy the above policy context, an Archaeological Desk Based Assessment has been completed and is submitted alongside this planning application. The Assessment identifies recorded and unrecorded assets within the site boundary and assesses their significance and value.

6.100 The Assessment concluded that as the proposals relate to a developed site, it is considered that there is some potential for previously unrecorded archaeological remains from the modern date, dating from the construction of Barnes Hospital in 1889. It is recommended that an archaeological watching brief is undertaken during the construction phase and this is proposed to be secured via a planning condition.

This will record any buried archaeological features preserved as sub-surface remains, thus ensuring that the Proposal is in line with policy requirements.

Townscape

- 6.101 The Site is located adjacent to an area of land which is designated as 'Other Open Land of Townscape Importance' (OOLTI) in the development plan. The OOLTI comprises the extent of the Old Mortlake Burial Ground to the west of the Site.
- 6.102 There are no explicit policies regarding townscape in the NPPF, but paragraph 127 outlines how development should function well and add to the overall quality of the area. This can be achieved through good architecture, layout and appropriate and effective landscaping. Development should also be sympathetic to local character and history, including the surrounding built environment and landscape setting. However, this should not prevent or discourage appropriate innovation or change.
- 6.103 Policy LP14 of the development plan has regard to OOLTI and requires the protection of the open use and enhancements where possible. The proposals will have no physical effect on the OOLTI adjacent to the Site and its character and openness will be unchanged.
- 6.104 The relevant part of LP14 to the proposals for Barnes Hospital states that:
- "Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated and other open land will be encouraged.*
- When considering developments on sites outside designed open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account."*** [our emphasis]
- 6.105 The character of the OOLTI is defined by its historical use as a burial ground. There are routes through the area which provide access to the monuments which are set in central, grassy areas. There are established trees within the OOLTI, and boundary planting encloses the open space and contributes to its tranquil, reflective character. The OOLTI is contained within an area of suburban development and it is experienced in this context. Built form is visible through the trees at the edges of the open land.
- 6.106 The proposals comply with LP14 by improving the appearance of development at the east boundary of the OOLTI.
- 6.107 Currently, the Site presents the unattractive rear elevations of the hospital buildings in the views out of the OOLTI. There is no clear townscape structure and no communication between the Site and the open land to the west.

- 6.108 The proposals will introduce buildings of high architectural quality to the views out of the burial ground. The Design Code demonstrates how the scale, materiality and design is appropriate to the existing context and will enhance the townscape character.
- 6.109 In response to feedback received during pre-application discussions, the massing at the west boundary of the Site (facing the OOLTI) is configured in two blocks. The buildings are separated by 13.5m. This break in the massing is designed to provide a link between the open land to the west and the proposed garden square within the Site.
- 6.110 The link will be a landscaped corridor which will enhance the open character of the OOLTI and provide an attractive visual connection through to the landscaping in the immediate, built-up area.
- 6.111 The proposals are therefore fully compliant with Policy LP14 of the development plan and national policy requirements.

Ground Conditions

- 6.112 Paragraph 178 of the NPPF states that development should be suitable for its proposed use in respect of ground conditions and risks of contamination. Policy 5.21 of the London Plan prioritises measures to ensure that development on previously contaminated land does not activate or spread contamination. Local Plan Policy LP10 manages local environmental impacts of all development proposals including land contamination, to ensure the safety and amenity of existing and new users of development sites.
- 6.113 To support development of the Site and understand potential land contamination issues, a Phase 1 Contaminated Land Assessment has been completed. The Assessment concludes that further geoenvironmental investigation is recommended, to be reserved by planning condition, in addition to a risk assessment report and remediation strategy if required. In combination this ongoing approach is in line with the relevant NPPF and Development Plan policies in ensuring a safe environment for future occupiers.

Noise

- 6.114 Paragraph 180 of the NPPF requires new development to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. Policy 7.15 of the London Plan requires development to mitigate and minimise potential impacts of noise as a result of new development, but also to separate noise sensitive development from major noise sources through the use of distance or layout. Policy LP8 protects the amenity and living conditions for occupants of development. Policy LP10 refers to the consideration of the environmental effects of development proposals, which includes noise and vibration.

- 6.115 Noise receptors in the vicinity of the application site are the nearby residential occupiers and cemetery. The dominant noise sources affecting the site are primarily from the nearby train line and overhead aircraft. A Noise Assessment is submitted as part of this application to consider the impact of these effects on the site and surrounding context, in consideration of the Development Control for Noise Generating and Noise Sensitive Development SPD.
- 6.116 The Assessment demonstrates that through appropriate design the proposed development would provide satisfactory internal acoustic environments both for school medical centre and residential uses. The Proposal is therefore considered to be acceptable in respect of noise issues and is therefore compliant with the Local Plan whilst also adhering to the NPPF.

Air Quality

- 6.117 Paragraph 181 of the NPPF supports opportunities to improve air quality or mitigate impacts where necessary. Policy 7.14 seeks to improve air quality and promote reductions in pollution emissions and exposure to pollution. Development is expected to be at least air quality neutral and not exacerbate existing poor air quality. Policy LP10 stipulates that new development should be designed to reduce environmental impacts from pollution and air quality.
- 6.118 Local receptors of potential air pollution around the Site are neighbouring residential properties and commercial uses. The Air Quality Assessment submitted in support of this application has determined that the Proposal is predicted to meet air quality objectives. It recommends best practice mitigation measures during the demolition and construction phase to protect nearby receptors from any associated nuisance that may be caused. The Proposal will therefore be acceptable in air quality terms and is in line with the requirements of planning policy, which supports proposals which incorporate mitigation measures to reduce impacts to acceptable levels, which should be supported particularly given the Borough's designation as an Air Quality Management Area.

Ecology

- 6.119 The NPPF promotes biodiversity in recognition of its role in supporting the natural and local environment, under paragraph 170, by requiring planning policies to protect sites of biodiversity value and provide net gains for biodiversity. London Plan Policy 7.19 seeks to protect and enhance biodiversity and notes that development should make a positive contribution to the management of biodiversity. This is reinforced by Local Plan Policy LP15.
- 6.120 The integrity of the Proposal has considered the biodiversity and habitat potential of the Site and its surroundings. This has been supported by the Phase 1 Habitat Survey which is submitted as part of this application. The Survey outlines that the site is generally of low biodiversity value, but that several badger setts are located on-site.

The Applicant will secure the necessary license from Natural England prior to closing the affected setts, and will accept a suitably worded planning condition to secure this.

- 6.121 The Proposal also seeks to promote biodiversity through the delivery of soft landscaping. The DAS outlines the landscaping strategy for the Proposal, which includes a combination of tree, hedgerow and shrub, and grass planting across the Site. This will promote habitat creation and a net gain in biodiversity as sought by the Local Plan. The Proposal is therefore acceptable on ecological grounds and it has been demonstrated that it is compliant with the Development Plan and NPPF.

Arboriculture

- 6.122 In respect of arboriculture, the NPPF notes that development resulting in the loss of irreplaceable habitats including veteran trees should be refused unless justified with a suitable compensation strategy. London Plan Policy 7.21 reinforces the protection of trees, noting that existing trees of value should be retained and any loss as a result of development should be replaced following the principle of right place, right tree. Policy LP16 of the Local Plan does accept the loss of existing trees which are dying, dangerous or those with no amenity value. Policy LP 17 actively promotes green roofs and walls in development.
- 6.123 The application is supported by an Arboricultural Method Statement which details the strategy for tree retention and removal, which has sought to retain as many trees as possible. Where trees are being removed, these are to be replaced as shown by the outline landscaping strategy. This approach meets the policy tests of the NPPF, London Plan and Local Plan set out above. The feasibility of green walls and roofs will be determined at reserved matters stage.

Daylight and Sunlight

- 6.124 The NPPF states that (Paragraph 127) that development should create places with a high standard of amenity for existing and future users. Policy LP10 expands on this and notes that the Council will ensure that local environmental impacts of development does not lead to detrimental effects on the health or amenity of existing and proposed occupiers of the site or surrounding land.
- 6.125 The application is supported by a Daylight and Sunlight Assessment, which assesses the daylight and sunlight impacts of the Proposal on surrounding residential properties. The Assessment demonstrates that the overall effect of the Proposal would not result in a material impact to daylight and sunlight on surrounding properties, in accordance with the BRE Guidance. The Proposal is also sensitively designed to ensure suitable separation distances from adjoining occupiers and between the blocks of development being proposed.

7.0 S106 HEADS OF TERMS

- 7.1 Under S106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in their land for the purpose of restricting or regulating the development or use of the land.
- 7.2 Paragraph 54 of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 7.3 Paragraph 56 states that planning obligations should only be used where they are necessary, directly related to the development and fair and reasonable in scale and kind to the development.
- 7.4 Paragraph 57 states that where up to date policies have set out the contributions, planning applications that comply with them should be assumed to be viable and it's up to the applicant to demonstrate.
- 7.5 It is anticipated that the following Section 106 contributions will be applicable for the proposed scheme:
- Transfer of the land for the SEN school
 - Affordable Housing Contribution, subject to viability%; and
 - A Travel Plan;

A CIL Additional Information Requirement Form has been submitted as part of this application. It is noted that the SEN school and medical centre CIL liability is £0 per sqm and the residential floorspace liability is, subject to any social housing relief and offsetting, Mayoral CIL £50 per sqm and Borough CIL £250 per sqm.

8.0 PLANNING BALANCE

- 8.1 This section of the Planning Statement provides a planning balance assessment as required under adopted and emerging planning policies and section 38(6) of the 2004 Act.
- 8.2 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from this scheme can be summarised as follows:
- The delivery of high quality development on a sustainable, brownfield site;
 - The delivery of a 90 pupil SEN School (Use Class D1), of which the council have identified the need for;
 - The delivery of a medical centre (Use Class D1) (up to 2,500 sqm), to enable high quality services in the area;
 - The retention of the 3 prominent, highest quality Buildings of Town and Merit to be converted into three residential units (Use Class C3) and medical floorspace (Use Class D1);
 - Delivery of up to 90 (new build) high quality residential dwellings (Use Class C3) helping to meeting the current and future housing requirements within the Borough;
 - The delivery of 1,004 sqm of high quality publically accessible open space;
 - The provision of 81 car parking spaces distributed across the uses;
 - The provision of up to 200 cycle spaces distributed across the uses; and
 - Ensuring the best use of the site, delivery a sustainable form of development, which provides community facilities and much needed residential accommodation.
- 8.3 Through this Planning Statement in line with policy, a clear and robust justification for the loss of part of the existing community use' has been set out.
- 8.4 It is considered that on the basis of the above, and even in the event of any identified harm arising from the proposed development, the planning benefits brought about and through the scheme represent significant material considerations which outweigh any such harm.

9.0 CONCLUSION

- 9.1 This Statement has been prepared by Montagu Evans LLP on behalf of South West London and St George's Mental Health NHS Trust, to support an application for outline planning permission at Barnes Hospital.
- 9.2 The outline application seeks to establish the principles of use, amount and massing of development. All other matters, except for details of access points at the site boundaries, are reserved for future consideration.
- 9.3 The application is seeking the comprehensive redevelopment of the site for a mixed use, community led scheme which will include a new medical centre (use class D1), a 90 pupil SEN school (use class D1), publically accessible open space and residential accommodation.
- 9.4 The Trust is embarking on an Estates Modernisation programme which will enable the Trust to embark upon an ambitious and much needed programme for the modernisation of the mental health facilities serving south west London.
- 9.5 The disposal of the Barnes Hospital site is a key factor in enabling the Estate Modernisation Programme. The modernisation strategy is based upon providing two main campus facilities at Springfield Hospital, Tooting and Tolworth Hospital, Kingston. These will serve people from the five boroughs in the Trust's primary catchment area, including Richmond. The proposed hospitals for both Springfield and Tolworth have full planning permission. Without the receipt of funds from the site's disposal the EMP would be hindered from progressing, putting increased pressure on the funding requirement.
- 9.6 The Trust is required to use their assets in the most efficient way, with this underutilisation the Trust is looking to declare the Barnes Hospital site surplus to requirements, whilst committing to retaining a presence on the site.
- 9.7 The existing site consists of a number of hospital buildings (Use Class C2) of which the majority have been vacant for a prolonged period. The application has been developed in accordance with adopted development plan policies, and other relevant guidance and material considerations.
- 9.8 National Policy resist the loss of community use where it would reduce the communities' ability to meet day-to-day needs.
- 9.9 The London Plan resists the loss of community uses, except where the loss is part of a wider public service transformation plan, of which is the case at Barnes Hospital.
- 9.10 Local Plan site allocation policy SA28 allocates the site for comprehensive development to provide social and community infrastructure facilities in the Borough, explicitly setting out a requirement for an SEN school. The policy goes on to state that the provision of housing would be considered as a potential redevelopment option.

- 9.11 As clearly justified against National, Regional and Local Planning Policies there are clear and robust justifications for a portion of the site to be developed for an alternative use.
- 9.12 The proposal is seeking to rationalise and substantially improve the community facilities at the site by the provision of a new medical health centre and a 90 pupil SEN school.
- 9.13 In addition to the health centre and SEN school, the Proposal will deliver up to 83 residential units across a range of tenures and sizes. This will help secure a supply of housing to encourage mixed communities, and contribute towards policy objectives regarding housing delivery. The Proposal would directly contribute towards the strategic housing requirement set out in the London Plan and should be supported in principle.
- 9.14 The Illustrative Masterplan and Parameter Plans show a design layout that demonstrates how the Proposed Development can integrate with its surroundings. Consideration has been given to respecting the sensitivity of neighbouring residential uses, by avoiding building heights and uses impacting on their amenity. Overall, the Illustrative Masterplan establishes a robust framework for the detailed design to take forward under Reserved Matters. The assessment of environmental issues has also demonstrated that the Proposed Development will not cause unacceptable harm on relevant receptors.
- 9.15 The site includes 8 Buildings of Townscape and Merit. The proposals seek to retain the three most significant buildings and convert into 3 residential units and additional medical floorspace. The submitted Heritage Statement demonstrates that the proposed selection of BTMs to be demolished is appropriate in terms of the balanced judgement on their significance. The setting of the remaining BTMs will also be enhanced, and the proposal enhances the setting and significance of the adjoining Conservation Area.
- 9.16 The supporting transport and highways assessments identify the site as a sustainable location to accommodate the proposed development. An analysis of the likely trip attraction of the development has been undertaken and demonstrates that the development proposals would not result in a material increase in vehicle trips when compared to the existing use on site.
- 9.17 It is anticipated that any additional person trips as a result of the proposals will be distributed across the sustainable transport opportunities within the vicinity of the site. On the basis of the above, it is concluded that the proposals can be accommodated without detriment to the operation of the local transport networks. As such, it is concluded there is no reason why the proposals should be resisted on traffic or transportation grounds.
- 9.18 The provision of a substantial amount of community and residential floorspace will make effective use of a significant brownfield site in the Borough, addressing the

strategic objectives of delivering community uses and housing supply initiatives in line with site allocation SA28.

- 9.19 In view of the above, we consider that the Proposal satisfies the key policy considerations and the general aims of national, regional and local planning policy. We therefore recommend this application to the Borough for approval.

APPENDICES

Appendix 1: Site Location Plan

NOTES:
 DO NOT SCALE FROM THIS DRAWING.
 ALL DIMENSIONS TO BE CHECKED ON SITE.
 ALL OMISSIONS AND DISCREPANCIES TO BE REPORTED TO THE ARCHITECT IMMEDIATELY.

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--- Site Boundary

Site Area: 14350 m2



Revision description	Date	Check	Rev
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SQUIRE & PARTNERS

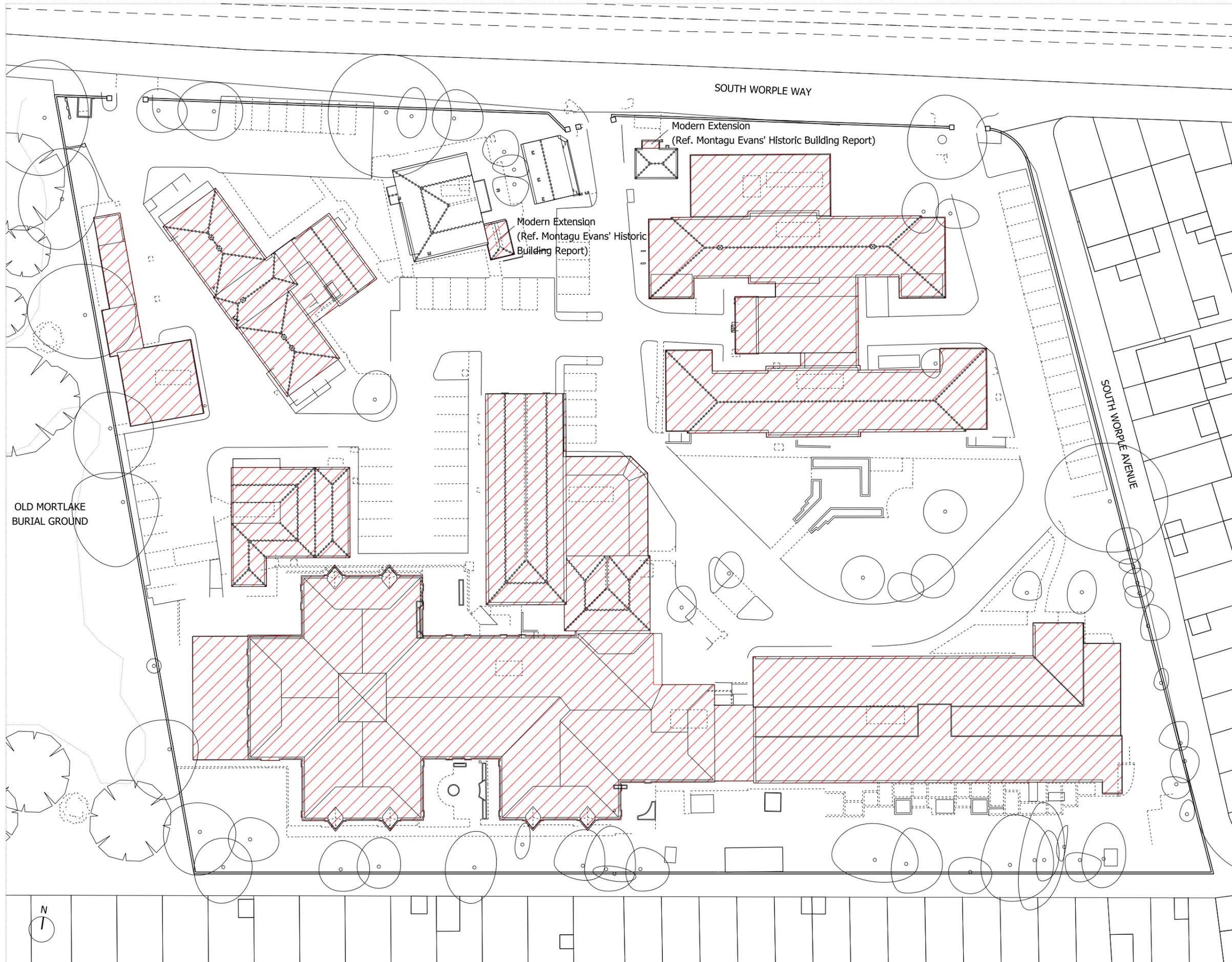
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Project
Barnes Hospital
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Drawing
Site Location Plan

Drawn	Date	Scale
SSI	31/10/2018	1:1250@A1 1:2500@A3
Job number	Drawing number	Revision
18002	P_00_C645_001	-

Appendix 2: Buildings of Townscape Merit Plan



NOTES:
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- Site Boundary
- Buildings to be Demolished

OLD MORTLAKE BURIAL GROUND

SOUTH WORPLE WAY

SOUTH WORPLE AVENUE

Modern Extension
 (Ref. Montagu Evans' Historic Building Report)

Modern Extension
 (Ref. Montagu Evans' Historic Building Report)

Revision description	Date	Check	Rev

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Drawing
Demolition Plan

Drawn	Date	Scale
SSI	31/10/2018	1:250@A1 1:500@A3
Job number	Drawing number	Revision
18002	C645_P_00_004	-

