Representation Hearing Report GLA/2024/0285/S3

8 October 2024

Springfield Hospital Phase 2B

Local Planning Authority: Wandsworth

Local Planning Authority reference: 2022/5288

Representation Hearing Report – Stage 3
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of the existing healthcare buildings and construction of 4 apartment blocks ranging in height from 3 to 5 storeys along with nine 3 storey townhouses containing a total of 449 residential units, external amenity space, 48 car parking spaces, 817 cycle parking spaces, landscaping and public realm works, and new access routes.

An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

The applicant
The applicant is **BDW Trading Limited** and **STEP Springfield Village Limited** and the architect is **Farrells**.

Recommendation
The Deputy Mayor for Planning, Regeneration and the Fire Service, acting as Local Planning Authority for the purpose of determining this application;

i. grants conditional planning permission in respect of application 2022/5288 for the reasons set out in the approval section below, and subject to the prior completion of a section 106 legal agreement;
ii. delegates authority to the Head of Development Management to issue the planning permission and attach, add, delete or vary, the final detailed wording of the conditions and informatives as required with any material changes being referred back to the Deputy Mayor, and authority to negotiate, agree the final wording, and sign and execute, and complete the section 106 legal agreement;
iii. delegates authority to the Head of Development Management to agree any variations to the proposed heads of terms for the section 106 legal agreement;
iv. delegates authority to the Head of Development Management to refer it back to the Deputy Mayor, if by 8 December 2024 the section 106 legal agreement has not been completed;
v. notes that approval of details pursuant to conditions imposed on the planning permission would be submitted to, and determined by Wandsworth Council; and
vi. notes that Wandsworth Council would be responsible for the enforcement of the planning obligations and conditions attached to the planning permission.

Introduction 4
Officer recommendation – reasons for approval 4
S106 legal agreement 6
Conditions 7
Site description and surrounding area 7
Details of the proposal 12
Referral to the Secretary of State 17
Relevant planning history and current planning application 17
Stage 1 18
Council resolutions 19
Stage 2 20
Relevant legislation, policies, and guidance 20
Response to consultation 22
Statutory consultee responses to Wandsworth Council 22
Individual neighbourhood responses 23
Neighbourhood objections 23
Neighbourhood support 25
Representations made to the Mayor of London 25
Objections 26
Principal planning issues 27
Land use principles 27
Policy context 28
Development on Metropolitan Open Land 28
Principle of residential development 35
Loss of existing health facilities and social infrastructure 36
Summary 36
Housing 37
Affordable housing 37
Standard of accommodation 39
Unit sizes 39
Inclusive access 40
Urban design 41
Design scrutiny 41
Height, scale, and massing 41
Development layout 43
Architecture and materials 43
Landscaping and public realm 45
Fire safety 46

Conclusion on urban design 46
Heritage 46
Surrounding amenity impacts 58
Daylight, sunlight, and overshadowing 58
Privacy, sense of enclosure and outlook 60
Noise 61
Sustainability and environment 62
Trees 62
Ecology and biodiversity 63
Urban greening 63
Energy 64
Waste management 64
Whole life-cycle carbon (WLC) 65
Digital connectivity 65
Water 65
Flood risk 65
Sustainable drainage 66
Air quality 66
Contamination 67
Transport 67
Conclusion and planning balance 78
Public benefits and planning balance and NPPF balance 79
Overall planning balance and Conclusion 80

Introduction

1. Having assumed authority to determine this planning application, this report sets out the matters that the Deputy Mayor for Planning, Regeneration, and the Fire Service must consider in determining whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

Officer recommendation – reasons for approval

2. The Deputy Mayor for Planning, Regeneration, and the Fire Service, acting as the local planning authority, has considered the particular circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Wandsworth Council's Planning Applications Committee report dated 19 March 2024, the separate draft decision notice prepared by the borough setting out the reasons for refusal and all consultation responses and representations made on the case to Wandsworth Council and the GLA. The below reasons set out, in summary, why this application is acceptable in planning policy terms:

    a) The loss of the existing buildings associated with the wider hospital site was established under the previous 2012 permission. The applicant has confirmed that the Shaftesbury Building is now vacant following the move of the services and users which previously operated in the building into the new hospital on the wider Springfield Hospital site in 2023. The Morrison Building will remain operational until 2027 when the services and users will move to Tolworth Hospital in the Royal Borough of Kingston upon Thames. The Morrison Building will not be decanted until the services are ready within Tolworth Hospital.

    b) The application proposes 449 residential units with 50% affordable housing by habitable room, with a tenure split of 50% Social Rent and 50% London Shared Ownership. The scheme follows the Fast Track Route. The affordable housing offer satisfies the requirements of the NPPF, Policies H4, H5 and H6 of the London Plan, the Mayor's Affordable Housing and Viability SPG, and Policy LP23 of the Local Plan.

    c) Part of the site is within designated Metropolitan Open Land (MOL). The proposed development would not cause substantial harm to the openness of the MOL, would re-use previously developed land, and contribute to meeting an identified affordable housing need within the area of the local planning authority. Therefore, the proposed development satisfies the requirements of the NPPF, Policy G3 of the London Plan, and Policy LP53 of the Local Plan.

    d) The design and layout principles of the scheme are well-considered in the context of the site constraints and would optimise development capacity. The proposal includes the delivery of up to 2.7 acres of public open space and introduces high-quality landscaping and public routes through the site. The height and massing of the buildings responds well to the topography of the site

and interacts well with the MOL. The architecture and materials are high-quality and would contribute positively to the surrounding area and have been appropriately secured. The proposed development satisfies the requirements of Policies D1, D3, D4, D5, D8, D9, D11, D12 and HC3 of the London Plan and Policies LP1, LP3, LP4, LP54 and LP56 of the Local Plan.

e) The proposed development causes harm to the significance of designated heritage assets resulting in conflicts with Policies HC1 of the London Plan and Policy LP3 of the Local Plan. GLA officers consider this impact to be less than substantial harm (at the low end of the scale) under Paragraph 205 of the NPPF. Great weight has been attributed to this harm. However, the public benefits delivered by the scheme would clearly and convincingly outweigh the identified heritage harm. The development also causes harm to the setting of a non-designated heritage asset and Paragraph 209 of the NPPF is therefore engaged. The effect of development on the significance of non-designated heritage assets has been taken into account.

f) The layout of the development provides new public realm and will allow permeability and connectivity through the site for pedestrians and cyclists encouraging sustainable travel. The scheme includes a reduction in residential car parking from the consented outline scheme, and is considered appropriate in this urban location, and includes transport improvements to ensure sustainable modes are highly attractive. The proposal would not result in any highway or pedestrian safety concerns subject to conditions and the completion of a S106 agreement. Subject to these mitigations, the transport impacts are in accordance with strategic and local transport policies in Policies T1, T2, T4, T5, T6, T6.1, T7 of the London Plan and Policies LP 50 and LP 51 of the Local Plan

g) GLA officers have identified neighbourhood amenity impacts including a loss of daylight, sunlight, and outlook. Given the context of the site the proposal is not considered to result in any unacceptable adverse impacts and satisfies the requirements of Policy D6 of the London Plan and Policy LP2 of the Local Plan.

h) The development would meet relevant standards for internal floorspace, and policy compliant levels of wheelchair accessible or adaptable housing designed to Part M4(3) standards equating to 10% and the remaining 90% of units will be designed to Part M4(2) standards are recommended to be secured in line with requirements set out in the Development Plan.

i) The proposed development has demonstrated that an acceptable standard of sustainable design and construction would be achieved, minimising carbon dioxide emissions, using energy efficiently and including renewable energy, in accordance with the London Plan energy hierarchy. The development would deliver sustainable urban drainage, ecology, and urban greening benefits and would comply with Policy SI 2 of the London Plan.

j) The Environmental Statement (ES) prepared by Trium provides an assessment of the likely significant effects of the proposal on the environment during the construction and operational phases. The ES and the supporting documents comply with the relevant regulations in terms of their scope and

methodology for assessment and reporting and respond to the Development Plan. Given the context of the site, the environmental impact of the development is considered to be acceptable.

k) It is the view of GLA officers that the proposals accord with the development plan, read as a whole. It is the view of GLA officers, applying section 38(6) of the 2004 Act, that material considerations, when taken together, do not represent a departure from the plan but rather confirm that the proposals should be granted planning permission.

S106 legal agreement

3. The following heads of terms have been agreed as a basis for the planning obligations to be contained within the section 106 legal agreement:

Affordable housing

- Provision of a minimum of 50% affordable units by habitable room (50% Social Rent and 50% Intermediate)
- Initial rents for the Social Rent units to be in accordance with the formula in the government's Policy Statement on Rents for Social Housing (December 2022) and subsequent increases set in line with the Regulator of Social Housing's Rent Standard
- The management of the affordable homes to be undertaken by a Registered Provider which is a Preferred Partner of the Council, unless otherwise agreed by the Council.
- A marketing strategy for the intermediate housing to be submitted to the Council nine months prior to first practical completion of the intermediate housing, giving the Council a period of three months exclusive nominations to households living and/or working in the borough, such marketing not to commence prior to six months before practical completion
- Early-stage viability review

Transport and highways

- Exclusion from CPZ for future occupants (except for Blue Badge Holders)
- To secure a residential travel plan (to be prepared in line with the Framework Travel Plan accompanying the application) to be submitted for approval prior to first occupation, with subsequent monitoring to be undertaken on the 1st, 3rd and 5th anniversaries of 75% occupation
- Contribution towards Green Travel Modes for first occupiers in the form of car club membership for each household prior to first occupation of each phase of the development
- To use reasonable endeavours to secure delivery of the Streatham Cemetery Pedestrian/Cycle Access Route and provisions regarding access (to include permitted closures for repairs, preventing rights of way accruing etc) subject to obtaining all commercial terms
- A Sustainable Transport Fund contribution of £350,000 and bus infrastructure contribution of £50,000.

Employment and Skills

- To enter into a Local Employment Agreement securing Employment and Skills Plan and Local Procurement Plan, with the target number of job, training and apprenticeship places based on the Council's Planning Obligations SPD
- To secure payment of Employment and Enterprise Contribution based on the Council's Planning Obligations SPD

Energy

- To secure a carbon offset payment to first occupation of each phase, or at a point agreed in writing by the Council, including the cost of independent review of final payment level, estimated to be approximately £368,967 with recalculation to be undertaken following practical completion of each phase with balancing payment based on as-built performance.
- 'Be seen' energy monitoring in accordance with the London Plan

Healthcare

- To secure a financial contribution of £261,788 towards primary care health infrastructure

Public realm

- To secure delivery of the element of Springfield Park within the application site boundary (2.7 acres) and thereafter ensure compliance with the park estate management strategy.

Arts and culture

- To secure implementation of the agreed Arts and Cultural Action Plan in accordance with the Council's Planning Obligations SPD

Monitoring fees

- To secure payment to cover relevant inspection and monitoring fees associated with implementation and monitoring of the Section 106 obligations in accordance with the Planning Obligations SPD.

Conditions

4. See Appendix 1 of this report.

Site description and surrounding area

5. The application site forms part of the wider Springfield Hospital site which is currently being redeveloped. The overall Springfield Hospital site occupies a total area of 33.3 hectares and is bounded by Burntwood Lane to the north-west; Beechcroft School, College Gardens, Chancery Mews, Ernest Bevin College and the Malcolm Gavin Hall Site to the north-east; Glenburnie Road, Lingwell Road and Hebdon Road to the south-east, Streatham Cemetery to the south, St. George's Grove to the south-west, and Burntwood School to the west.

6. The site the subject of the current application, lies on the southern side of the wider Springfield Hospital site and is approximately 3.46 hectares. It is currently occupied by the Morrison Building; the Shaftesbury Building and the Diamond

Estate, each associated with the hospital, together with associated hard surfacing, car parking and soft landscaping.

7. There are a variety of heritage buildings on the wider Springfield Hospital site, the most dominant of which is the Grade II listed Main Hospital Building, a three/four-storey building located towards the centre of the Springfield site, to the north of the current application site. The two-three storey Grade II listed Elizabeth Newton Wing lies to the south-east of the Main Building and to the north-east of the current application site. In total there are 11 pre-1948 buildings within the overall Springfield site that are either listed by virtue of their curtilage status or subsequent attachment to a listed building, and there are several post-1948 buildings, of varying size and form.

8. The Springfield Hospital site contains designated and protected landscape features as Metropolitan Open Land (MOL), with the gardens of Springfield Hospital also a Grade II Registered Park and Garden (RPG). Part of the site of the current application falls within the MOL and RPG.

9. The site has a site allocation (OUT3) in the Local Plan for new and improved hospital facilities, residential and small-scale commercial / retail use serving the hospital, residential and school facilities. It states that open space should be retained for use as a public park with recreational use.

10. There are several trees the subject of a Tree Preservation Order (TPO) on the wider hospital site. A group TPO covers the southern part of the site from the east boundary with Ernest Bevin School to the west boundary adjoining Streatham Cemetery. 23 TPO trees lie within the current application site boundary.

Figure 1: The application site, outlined with a solid red line, within the wider Springfield Hospital site

Figure 2: Aerial view of the application site with the existing buildings

11. To the north-east of the application site, and still within the wider Springfield site, are 26 two and three-storey terraced residential properties within John Hunter Avenue. To the east / south-east of the application site, are two-storey terraced residential properties in Hebdon Road and Lingwell Road. To the west of the application site lie four-storey flatted blocks and five-storey student halls of accommodation within St Georges Grove.

12. Streatham Cemetery, which forms part of the MOL, and which is managed by London Borough of Lambeth, lies to the south of the application site.

Figure 3: The existing site

Figure 4: Streatham Cemetery

Figure 5: Existing properties on John Hunter Avenue

Details of the proposal

13. Demolition of the existing healthcare buildings and construction of 4 apartment blocks ranging in height from 3 to 5 storeys along with nine 3 storey townhouses containing a total of 449 residential units, external amenity space, 48 car parking spaces, 817 cycle parking spaces, landscaping and public realm works, and new access routes.

Demolition

14. Demolition of all buildings and structures on the site including the Morrison Building which is a curtilage listed building which pre-dates 1978 and requires listed building consent for its removal. The demolition of this building has been accepted under the extant listed building consent (LPA ref. 2010/3706) associated with the approved outline permission for the wider Springfield Hospital site. The Diamond Estate and Shaftesbury Building were constructed post-1948 and not listed and therefore no objection is raised to their demolition.

Apartment Blocks (A, B, C and D)

15. The four apartment blocks will range in height from 3 to 5 storeys and are arranged in a series of broadly rectangular sub blocks set around internal courtyards which would have a partly open aperture on each side.

Townhouses (Block E)

16. The nine townhouses will be 3 storeys in height and located to the north-eastern part of the site to the rear of the terrace of existing houses at 1-8 John Hunter Avenue.

Figure 6: The proposed layout

Figure 7: Proposed elevations and sections of the flatted blocks.

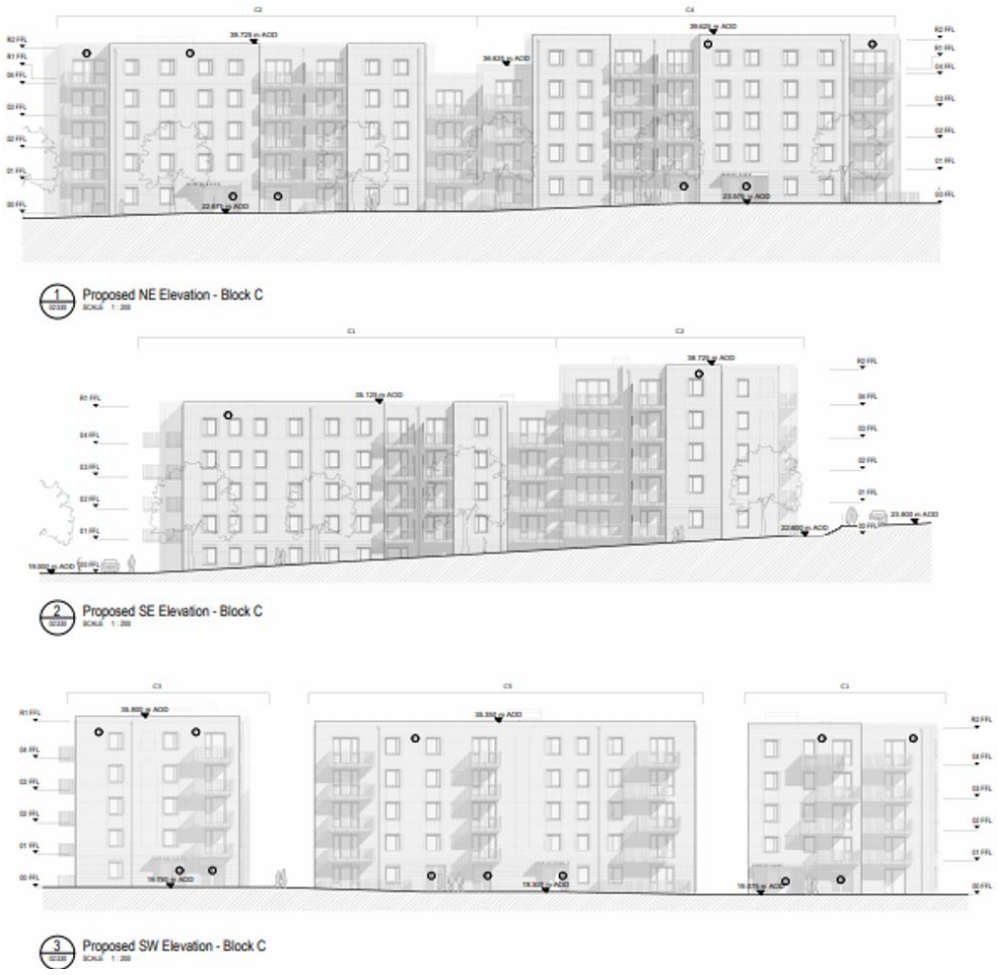

Figure 8: Proposed elevations of the flatted blocks

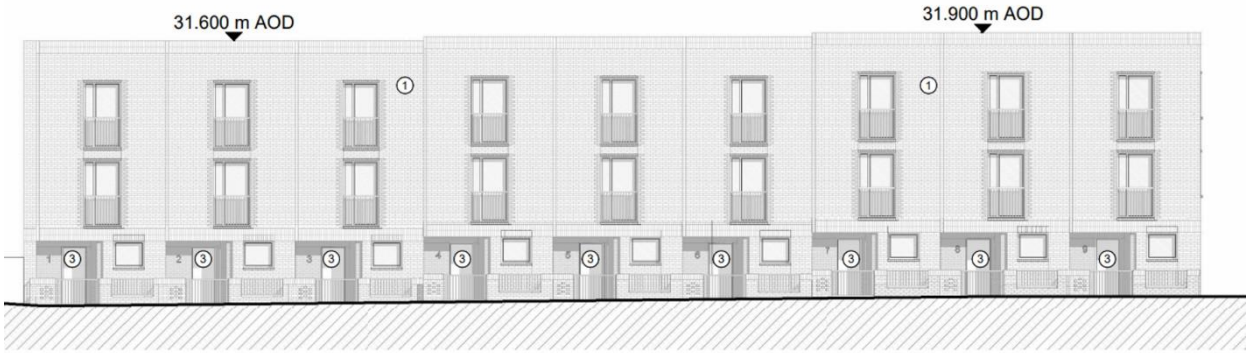

Figure 9: Proposed elevations of the townhouses

Car parking and cycle parking

17. The proposed development includes 48 car parking spaces, with 13 (27%) to be provided as disabled parking spaces. The car parking will be located at street level primarily along the northern and eastern boundary and through the new east to west vehicular route. The existing car park and access road to the western side of the site will be removed and the existing access road to the south of the properties on John Hunter Avenue will be altered to allow for the new east to west vehicular route. The proposed development includes 817 cycle parking spaces

which are located within dedicated cycle stores within the apartment blocks with individual provision for the townhouses.

Public realm and landscaping

18. The proposed development includes 7,163 sq.m. of private amenity space, 1,214 sq.m. of publicly accessible open space, and 2,053 sq.m. of play space. 50 trees are proposed to be removed, including 10 TPO trees, with 50 replacement trees proposed. A variety of hard and soft landscaping is proposed throughout the development. A bio-diverse attenuation pond is also proposed. The delivery of up to 2.7 acres of public park is secured under this application.

Figure 10: CGI of the proposed development from the MOL

Figure 11. CGI of within the development towards Streatham Cemetery

Figure 12: CGI of the Block C courtyard

Stage 3

19. Following the Deputy Mayor's decision to call in the application, GLA officers engaged the applicant in a series of discussions on revisions to the scheme, including affordable housing, public realm and landscaping, and sustainability.

20. On 21 August 2024, the applicant submitted a set of revised documentation including plans and reports to GLA officers, covering the following amendments:

    - Reduction in the carbon offset payment from £437,013 to £368.967 due to an increase in carbon savings to 67%;
    - Increased scope for the delivery of PV panels and green roof optimisation;
    - Improvements to the proposed energy strategy, whole life cycle carbon and circular economy;
    - Improvements to the drainage strategy;
    - Amendments to the location of the proposed delivery and servicing bays;
    - Introduction of new trees along the northern boundary of the site;
    - Commitment to the securing of a Sustainable Transport Fund as part of the S106 agreement;
    - Optimising landscape levels to reduce the elevation of the retaining wall and provide visual improvements; and
    - Optimising building layouts to ensure internal corridors meet Part B distance requirements without relying on a fire engineered solution such as mechanical ventilation systems.

21. Given the nature of the revised documentation and that no significant amendments were sought, re-consultation was not required.

22. The Deputy Mayor will undertake an accompanied site visit on 2 October 2024 with GLA and TfL officers, representatives of the Council, and the applicant team.

23. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case. The Deputy Mayor's decision on this case, and the reasons for it, will be made available on the GLA's website www.london.gov.uk

Referral to the Secretary of State

24. The power of the Secretary of State to call-in an application also exists where the Mayor has called-in an application.

Relevant planning history and current planning application

25. The wider Springfield Hospital site includes the following extant outline planning permission (LPA ref: 2010/2703) which was granted on appeal on 20 June 2012:

> *Redevelopment of Springfield Hospital site entailing the erection of 25,000 sq.m replacement mental health facilities (Use Class C2/C2A); 839 residential dwellings (including up to 262 dwellings within the converted Main Building and Elizabeth Newton Wing and 56 extra care residential apartments) (Use Class C3); 9,200 sq.m elderly persons' care home*

(including up to 50 close care units) (Use Class C2); 240 sq.m of retail floorspace (Use Class A1); a school Use Class (D1); 3,500 sq.m of flexible non-residential floor space, Use Class A1(up to 160 sq.m), A2 (up to 200 sq.m), A3 (up to 300 sq.m), A4 (up to 250 sq.m), B1 (up to 200 sq.m), D1 (up to 1195 sq.m), or D2 (up to 1195 sq.m)); landscaped public park; other private and public open space; construction of a combined cooling, heat and power energy centre; associated landscaping, parking, roads, access and infrastructure and other associated works. (Outline application with appearance, landscaping and scale reserved).

26. Various reserved matters applications have been approved on the site with others to come forward. No reserved matters approval under the 2012 permission has been granted in respect of the application site, which was referred to in the outline permission masterplan as Plots X, Y, Z and B and had an indicative capacity of 89 residential dwellings in the form of townhouses. However, the present application is a separate application for full planning permission. It is noted that all 839 residential units approved under the 2012 permission have come forward on other sites within the hospital site.

27. The scheme was subject to pre-application discussions with GLA officers as well as Council officers. On 3 August 2022, a formal pre-application meeting (Stage 2 pre-app; Ref: 2022/0497/P2I) was held with GLA officers and a written response issued on 1 September 2022. In summary, the applicant was advised:

"The proposal would be inappropriate development on MOL. The applicant should reduce the impact of the development on the openness of the MOL and demonstrate very special circumstances exist for such a development on MOL that would outweigh the harm caused by reason of inappropriateness, and any other harm, in line with the NPPF and Policy G3 of the London Plan. This must be demonstrated before the increased quantum of residential use can be considered acceptable on this site. The future application will need to address the issues raised in this report with respect to development on MOL, land use principles, urban design, affordable housing, fire safety, transport, and sustainability."

Stage 1

28. On 24 January 2023, the Mayor of London received documents from Wandsworth Council notifying him that a planning application has been submitted that was of potential strategic importance, referring it under the following Categories to that Order:

- ***Category 1A – 1 –*** *Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*

- ***Category 3D – 1 –*** *Development— (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.*

29. On 9 March 2023, the Deputy Mayor for Planning, Regeneration and the Fire Service (hereafter, Deputy Mayor) considered the application and report prepared by GLA officers. The report advised Wandsworth Council that the application did not yet comply with the London Plan for the following reasons:

- **Land use principles:** The proposal would result in harm to MOL openness; however, further information is required to verify the extent of this harm as well as the potential existence of very special circumstances.

- **Housing:** The proposed development includes 50% affordable housing by habitable room including 60% Social rent and 40% London Shared Ownership and therefore could be eligible to follow the Fast Track Route, subject to the LPA confirming the tenure mix meets local policy requirements. An early-stage review and affordability levels should be secured.

- **Urban design and heritage:** Whilst the revised pattern of development would support an efficient use of land in masterplan terms, the urban block typologies present a more challenging response to MOL. Further refinements to layout, scale and massing, and landscape and public realm should be considered. Whilst the proposal would deliver some heritage benefits, GLA officers consider that harm would also be caused to the setting of nearby heritage assets.

- **Transport:** Further information is required on Healthy Streets, car and cycle parking, buses, delivery and servicing, and travel plans.

- **Sustainable development and environment:** Further information is required on energy, circular economy whole life-cycle carbon, green infrastructure, water, and air quality.

30. Following Stage 1, and prior to the consideration of the proposal at the Wandsworth Planning Applications Committee, minor amendments were made to the scheme, as outlined further above.

Council resolutions

31. On 21 November 2023, the application was considered by Wandsworth Planning Applications Committee. Members resolved to refuse planning permission against officer recommendation to grant. The draft decision notice cited the following reasons for refusal:

- **Reason 1:** The proposed development, due to its scale, location and density constitutes inappropriate development in that part of the application site which is within Metropolitan Open Land. Whilst the application site is considered to be Previously Developed Land (as defined in Annex 2 of the NPPF 2023) the proposed new buildings do not fall within the permissible exceptions within paragraph 154(g) of the NPPF (2023) because they would have a greater impact on the openness of the Metropolitan Open Land than the existing development and they would cause substantial harm to the openness of the Metropolitan Open Land. The proposed development is therefore contrary to policy G3 of the London Plan (adopted 2021), policy LP53 of the Wandsworth Local Plan (adopted July 2023) and paragraph 154 of the NPPF (2023).

- **Reason 2:** The proposed development, due to the number of residential units proposed and the application site's isolated location with poor public transport accessibility, would generate a large number of trips including from servicing and deliveries, placing unreasonable pressure on the constrained surrounding transport network and to the detriment of both existing residents in the locality and future residents of the proposed development, contrary to policies LP50 and LP51 of the Wandsworth Local Plan (adopted July 2023).

- **Reason 3:** In the absence of a completed Section 106 planning obligation the proposal fails to mitigate the adverse impacts of the development and to meet the objectives of Policy LP62 of the Wandsworth Local Plan (adopted July 2023) and the Council's Planning Obligations SPD (dated October 2020).

Stage 2

32. On 8 May 2024, Wandsworth Council advised the Mayor of its decision. On 20 May 2024, the Deputy Mayor, acting under delegated powers, considered the GLA report (Reference 2023/0071/S2). The report concluded that, having regard to the details of the application:

    a) Given the significant London-wide shortfall against the minimum strategic affordable housing targets, the proposed development has the potential to make a substantial and positive contribution towards achieving local and strategic housing and affordable housing targets set out in the London Plan. Accordingly, it is considered that the proposed development, in terms of its potential to contribute to the delivery of housing and affordable housing in response to Policies H1 and H4 of the London Plan are such that it would have an important and significant impact on the implementation of the London Plan.

    b) As well as new housing and affordable housing, the scheme proposes landscaping and public realm improvements, as well as contributions towards healthcare, transport, and CIL, and provide employment opportunities. Subject to appropriate conditions and obligations being secured, the scheme could have local and London-wide level benefits. As such, it is considered that there are sound planning reasons for the Mayor to intervene and become the local planning authority in respect of the application. This will provide him with the opportunity to give further consideration to the application and determine it himself.

33. The Stage 2 report outlined outstanding issues including development on MOL, urban design, heritage, transport, energy, whole-life cycle carbon, circular economy, air quality, and biodiversity.

Relevant legislation, policies, and guidance

34. The Deputy Mayor must determine the application for planning permission in accordance with the requirement of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. The Deputy Mayor is required to determine the application in accordance with the development plan unless material considerations indicate

otherwise. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan consists of the Wandsworth Local Plan 2023 and the London Plan 2021.

35. Paragraph 225 of the NPPF states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the NPPF, and that due weight should be given to them, according to their degree of consistency with the NPPF. All relevant policies in the adopted development plan are considered to be consistent with the NPPF.

36. The Deputy Mayor is also required to have regard, as material considerations, to national planning policy and guidance, as well as supplementary planning documents and, depending on their state of advancement, emerging elements of the development plan and other planning policies.

37. The relevant planning guidance at the national, regional and local levels are as follows:

- Accessible London: achieving an inclusive environment SPG (October 2014);
- The control of dust and emissions during construction and demolition SPG (July 2014);
- All London Green Grid SPG (March 2012);
- Planning for Equality and Diversity in London (October 2007);
- Public London Charter LPG (September 2021);
- Mayor's Transport Strategy (March 2018);
- Mayor's Environment Strategy (May 2018);
- 'Be Seen' Energy Monitoring Guidance (September 2021);
- London Cycle Design Standards (October 2016);
- Circular Economy Statement LPG (March 2022);
- Whole Life-Cycle Carbon Assessments LPG (March 2022).
- Air Quality Positive LPG (February 2023);
- Air Quality Neutral LPG (February 2023);
- Energy Assessment Guidance (June 2022);
- Sustainable Transport, Walking, and Cycling LPG (November 2022);
- Urban Greening Factor LPG (February 2023);
- Housing Design Standards LPG (June 2023);

- Optimising Site Capacity: A Design-led Approach LPG (June 2023);
- Characterisation and Growth Strategy (June 2023);
- Wandsworth Local Plan (2023);
- Wandsworth Housing SPD (2016);
- Wandsworth Planning Obligations SPD (2020); and
- Wandsworth Refuse and Recyclables in Developments (2014).

38. A Written Ministerial Statement, for the ongoing consultation on the revised NPPF, was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft National Planning Policy Framework was also published on 30 July 2024. However, given it is still in draft and subject to consultation and change, the weight to attach to it is limited.

Response to consultation

Statutory consultee responses to Wandsworth Council

39. The statutory responses were typically copied and issued to both Councils. The key issues raised are summarised as follows:

40. **Greater London Authority (including Transport for London):** The Mayor's initial consultation stage comments (GLA report ref: 2023/0062/S1) and the Mayor's Stage 2 decisions (GLA report ref: 2023/0171/S2)) are set out in aforementioned reports and are summarised in the 'Relevant planning history and current planning application' section above.

41. **Historic England and Historic England (Archaeology):** No objection raised.

42. **The Gardens Trust (London Parks and Gardens:** Objection raised due to height, heritage impacts, disturbance to cemetery, and trees.

43. **Natural England:** No objection raised.

44. **The Countryside Charity (London):** Objection raised due to inappropriate development on MOL.

45. **Environment Agency:** No objection raised.

46. **Thames Water**: No objection subject to recommended conditions.

47. **London Borough of Lambeth**: No objection raised.

Individual neighbourhood responses

48. As part of the public consultation process, Wandsworth Council publicised the application by sending notifications to local addresses, issuing site and press notices and consulting relevant statutory bodies.

49. Follow the neighbourhood consultation process Wandsworth Council received a total of 440 responses (396 in objection, 41 support and 3 neutral). Responses in objection were received from the following local community groups: Wandsworth Society, Wandsworth Tree Warden Network, Wandsworth Conservation Area Advisory Committee, and Friends of Streatham Cemetery. Responses in support were received from the Wandsworth Chamber of Commerce.

50. Copies of all responses to public consultation, and any other representations made on the case, have been made available to the GLA, and are summarised below:

Neighbourhood objections

- Excessive in height, bulk and scale and overdevelopment of the site;
- Increase in quantum and scale compared to extant consent;
- Application does not consider why extant consent was refused;
- Harmful to the nearby listed buildings and conservation area;
- Impact on the openness of the Metropolitan Open Land and the applicant has failed to demonstrate Very Special Circumstances for the development;
- Out of character with the surrounding area in terms of scale, design and appearance;
- Inappropriate height transition from development to the listed buildings and neighbouring low-rise residential properties;
- Unattractive development;
- Surrounding area will not cope with the additional quantum of development, including doctors, schools, local roads, public transport, etc;
- Overpopulation of the local area;
- Impact on existing residents' quality of life and property values;
- Does not serve the best interests of the local community;
- Lack of need for new housing;
- Housing mix will not contribute positively to housing supply, including lack of family housing;

- Poor internal quality of residential units;
- Too much affordable housing;
- Concerns the affordable housing will not be genuinely affordable and exist in perpetuity;
- Lack of homes which have facilities / access for the elderly;
- Lack of community facilities for the new residents;
- Concerns with the fate of existing residents in Morrisons, Shaftsbury and Diamond Estates;
- Loss of staff accommodation;
- Loss of daylight, sunlight, outlook and privacy to neighbouring properties and public spaces;
- Noise, light, and air pollution;
- Carbon emissions;
- Construction impacts;
- Increases in crime and littering;
- Drainage, sewer and flood impacts;
- Impact on vehicular and pedestrian networks from additional residents;
- Existing street network is under strain and will be impacted by the development;
- Traffic congestion and safety, including during construction;
- Concerns with the proposed street layout and poor access;
- Lack of car parking within the development;
- Car parking will be an issue on neighbouring streets;
- Cycle parking provision is aspirational and there are no plans to improve cycle network;
- Existing rail and bus services will not cope with additional residents and the plan for the 315 bus will cause issues;
- Consideration should be given to excluding all car ownership from the development;
- Biodiversity impacts, including on local wildlife, landscape and environment;

- Impacts on trees and open space;
- Errors or missing information from the drawings, reports and visuals, and provided information is unclear or not transparent;
- Issues with consultation;
- Net zero targets or embedding circular economy principles are bland and generic aspirations;
- Greed from the developer;
- Previous applications with a similar quantum of development proposed have been refused on the site due to various concerns;
- CIL should be spent in the area;
- The redevelopment of Tolworth Hospital is not a benefit for locals and NHS support for the scheme is concerning.

Neighbourhood support

- New housing and affordable housing are much needed, including social rented homes which could house key workers;
- Creating healthy spaces will benefit the health of all residents;
- Enabling the delivery of Tolworth Hospital and enhanced mental health facilities;
- Existing mental health facilities are no longer fit for purpose.

Neighbourhood comments

- Queries on highways and public transport impacts;
- Queries on impacts of the existing drainage system;
- Impacts to property values.

Representations made to the Mayor of London

51. The Deputy Mayor took over the planning application for his own determination on 20 May 2024. Letters to neighbours outlining that the Deputy Mayor would be responsible for determining this planning application instead of the Council were sent on 31 May 2024. The letters advised that if substantial amendments are made to the application, a public consultation will be held.

52. As outlined in this report, there were no substantial amendments made to the application following the decision to call in the application. Therefore, a further public consultation was not required.

53. At the time of writing, a total of 23 responses were received through the GLA's PlanApps website to the notification letters, of which 23 responses objected to the application.

54. All these responses have been made available to the Deputy Mayor and have been taken into account in this report.

Objections

55. The issues raised in objection can be summarised, as follows:

- Excessive in height, scale, and density;
- Heritage, townscape, and visual impacts;
- Precedent for overriding community engagement;
- Bias in the decision making process;
- Design quality;
- Community impacts;
- Transport and parking impacts;
- Impacts on MOL and inappropriate development on MOL;
- Planning application has already been refused;
- Inadequate affordable housing;
- Flood risk and drainage issues;
- Greed from developers;
- Neighbourhood amenity impacts including loss of daylight, sunlight and outlook, and opportunities for overlooking, including inaccuracies with the BRE assessment;
- Lack of landscaping and loss of trees;
- Link to Tolworth Hospital is not appropriate as it is not located in Wandsworth;
- Non-compliance with local policy in terms of architecture, character, heights, layout, and unit mix;
- Pressure on local services, including transport, dentists, hospitals, and schools;
- Impacts from construction, including noise, odours, and vibration.
- Concerns with the one storey reduction requested by GLA officers was not pursued after the call-in of the application;

- The site is not previously developed land as the Council contends.

Principal planning issues

56. Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the application that the Deputy Mayor must consider are:

    - Land use principles (including policy designations, housing, and social infrastructure);
    - Urban design (including design scrutiny, surrounding character, layout & public realm, height & massing, residential amenity, fire safety, and inclusive design);
    - Heritage (including the significance of the existing buildings on site, and impacts to the significance of designated and non-designated heritage assets including archaeology, which may be affected by development within their setting
    - Surrounding amenity impacts (including daylight, sunlight & overshadowing, privacy, noise & vibration, and wind microclimate);
    - Green infrastructure and the natural environment (including trees, biodiversity & ecology and urban greening);
    - Sustainability and climate change (including sustainability strategy, air quality, energy, waste & the circular economy, and flood risk & drainage)
    - Transport (including healthy streets and vision zero, vehicle access and parking, cycle parking, deliveries and servicing, demolition and construction, travel plan, environmental impacts);
    - Socio-economic impacts;
    - Mitigating the impact of development through planning obligations;
    - Planning balance; and
    - Environmental Impact Assessment.

57. These issues are considered in the following sections of this report.

Land use principles

58. This section considers the key land use principles for the proposed development.

Policy context

59. The land use principles primarily relate to the development on Metropolitan Open Land (MOL), the loss of the existing health facilities, and the provision of residential units.

Development on Metropolitan Open Land

60. Part of the application site is located within designated MOL. Policy G3 of the London Plan requires that MOL is afforded the same status and level of protection as the Green Belt.

61. The NPPF attaches great importance to the Green Belt, and by extension MOL. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and permanence.

62. The London Plan describes MOL as strategic open land within the urban area that protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity. Policy G3 requires that MOL should be protected from inappropriate development in accordance with policy tests set out in the NPPF that apply to the Green Belt. Paragraph 152 of the NPPF states inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC).

63. Policy LP53 of the Local Plan states that the Council will protect and extend access to existing public and private green and blue infrastructure in the borough and where appropriate secure its enhancement, including MOL. The policy states that areas of open space such as MOL will be protected, enhanced, and made more accessible. Part E of the policy states that any reduction of green or blue infrastructure, including protected open space, will not be supported unless exceptional circumstances exist.

64. Paragraph 152 of the NPPF states that, by definition, inappropriate development is harmful to the Green Belt and should not be approved except in 'VSC'.

65. Paragraph 153 of the NPPF further states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

66. Paragraph 154 of the NPPF outlines that local planning authorities should regard the construction of new buildings in the Green Belt as inappropriate unless it falls within one of the listed exceptions.

67. Under those listed exceptions Part (g) of Paragraph 154 of the NPPF confirms that limited infilling or the partial or complete redevelopment of previously developed land within the Green Belt would not be "inappropriate" where there would be no greater impact on the openness of the Green Belt than existing

development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

68. It is noted that Part (g) of Paragraph 154 (to become Paragraph 151) is proposed to be changed under the consultation draft NPPF referred to at Paragraph 66 to 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.' However, given the status of the document GLA officers consider that the draft revisions to the NPPF only attract limited weight.

69. As set out in Annex 2 the NPPF, PDL is defined as 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

70. During the assessment of the application, the Council and the applicant agreed that the site falls within the NPPF definition of PDL; did not fall within any of the exceptions identified in the NPPF definition; and that the proposed development was therefore appropriate development on MOL. This view differed from the position in the GLA Stage 1 report that VSC would need to be demonstrated. Having regard to the information provided by the applicant, the report produced by Council officers and the site visit and analysis carried out by GLA officers, it is now considered that the site comprises PDL within the meaning of the NPPF.

71. The site includes land which is occupied by permanent structures (i.e. the Morrison and Shaftesbury Buildings and the Diamond Estate) which have never been occupied for agricultural or forestry purposes. GLA officers consider that the areas of open space around the buildings fall within the curtilage of those buildings. The extent of a building's curtilage is a matter of fact and degree for the judgment of the decision maker. GLA officers are satisfied that the open space comprised in the site forms part and parcel of the buildings and shares an intimate relationship with them. The open space around the Morrison and Shaftesbury buildings is largely landscaped and contains car parking spaces, footpaths and highways and other infrastructure associated with those buildings as well as a sports pitch serving the Shaftesbury building. Historical maps indicate that all of the site, including the land around the Diamond Estate and to the southern, western and northern boundaries of the site appears to have been levelled as part of the wider hospital development to provide landscaping around the hospital complex, which indicates an intimate relationship between the open spaces and associated buildings.

72. GLA officers have also considered whether any of the exceptions to the definition of PDL in the NPPF apply. Those exceptions are (a) land in built-up areas such as

residential gardens, parks, recreation grounds and allotments and (b) land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. In respect of (a), none of the land comprised in the site appears to have been used as a park, allotment, recreation ground or residential garden. Noting that the examples in (a) are expressed as examples only, GLA officers have considered whether the land associated with the Morrison or Shaftesbury Building could be considered to fall within that exception notwithstanding the fact that it was not a 'residential' garden. On balance, GLA officers have concluded that if the exception had been intended to apply to gardens generally (rather than just residential gardens), it would have been drafted in wider terms. Furthermore, it appears that the main function of all the open space within the site was to provide separation and relief between institutional buildings and to provide coherence to the wider hospital complex. The Diamond Estate provides residential accommodation solely for use by hospital staff, directly connected with the wider hospital buildings which has been used as amenity space of the Diamond Estate. The exclusion of residential gardens in built-up areas was to address concerns about 'garden grabbing' in built-up areas. The landscaped areas around the site are not considered to fall within the types of exception towards which (a) is directed. As such, GLA officers do not consider the areas of open space to fall within exception (a). As to (b), the buildings on the site remain readily apparent and GLA officers do not consider that the permanent structures on the site have blended into the landscape.

73. In light of the above, the proposed development will not constitute inappropriate development provided it would have no greater impact on the openness of the Green Belt than the existing development or would not cause substantial harm to the openness of the Green Belt and would contribute to meeting an identified an affordable housing need within the area of the local planning authority.

Figure 13: Boundary of MOL shown in green hatched, application site in red.

Impacts to openness

74. Openness is an open-textured concept, with a number of factors potentially relevant including visual and spatial aspects of openness. Prominent among them will be factors relevant to how built up the MOL is now and how built up it would be if redevelopment were to occur.

75. The existing site contains 9,399 sq.m. of developed area within the MOL, comprising 4,254 sq.m. of building footprint and 5,145 sq.m. of roads and hardstanding. The proposed development would result in a total of 5,365 sqm of developed area within the MOL. This comprises 4,137 sq.m. of building footprint and 1,228 sq.m. of roads and hardstanding.

MOL Calculations (Application Site)		
	Existing	Proposed Development
Building footprint	4,254 sqm	4,137 sqm
Roads and hardstanding Footprint	5,145 sqm	1,228 sqm
Total	9,399 sqm	5,365 sqm

Figure 14: MOL calculations

76. As demonstrated above, the proposed development would result in a 43% reduction of developed areas in terms of built footprint (buildings and hardstanding) compared to the existing site. The figures below demonstrate a comparison of the existing and the proposed positions, with the red colouring showing buildings and the blue colouring showing hard standing.

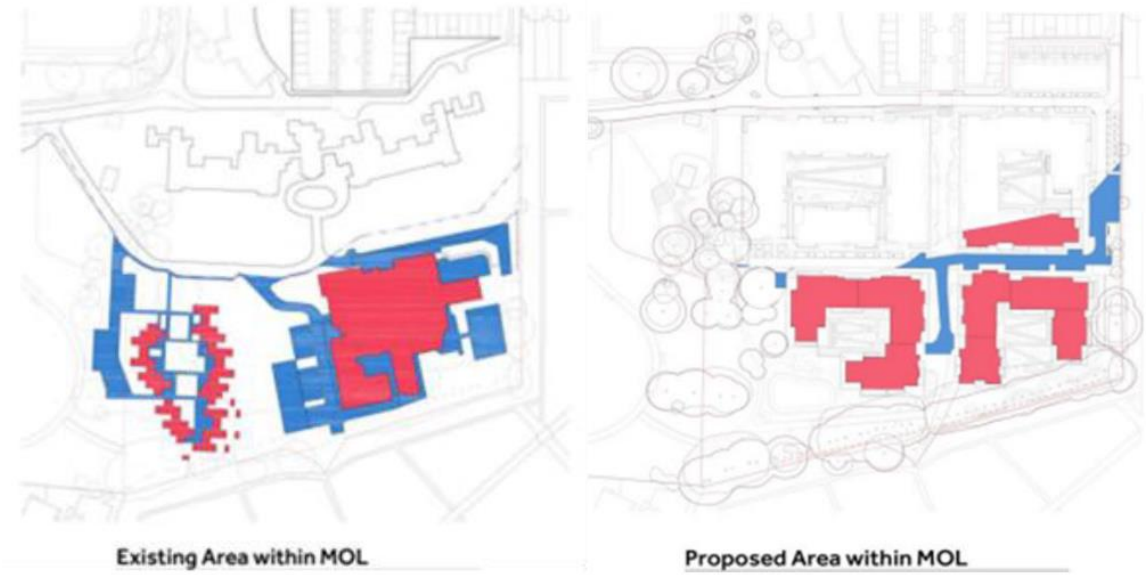

Figure 15: Existing and proposed areas within MOL

77. The volume of the existing built form on the MOL is circa 30,000m3. The proposed development within the MOL have a volume of 52,900 m3, representing a 76% increase.

78. It is established that whilst the proposed development has a smaller built footprint than existing, the proposed development would be of a greater volume and height than the existing buildings.

79. The existing Shaftesbury Building provides secure hospital accommodation and comprises a large and impermeable block which is secured by a 6-metre-high security fence and solid wall which runs along the boundary of the hospital. The Diamond Estate also has an enclosing form in its orientation towards the MOL. The impacts of openness of these buildings are exacerbated by the significant quantum of roads and hardstanding in the curtilage of the buildings. The nature of the existing buildings is considered to adversely affect the visual perception of openness.

80. GLA officers consider that the proposed height and massing give the development a dense, urban nature, which presents a more challenging response to the MOL compared to the existing development. As illustrated in Figures 16 and 17 below, the development would be more visible from Springfield Park and Streatham Cemetery than the existing development. In order to reduce the visual impacts to the MOL, the development positions the taller 5-storey buildings in the less sensitive areas of the site which step down to 3-storeys within the MOL. The buildings work with the existing topography of the site to add variation in ground levels, and introduces variations in architecture and materials to assist in breaking down visual bulk. The footprint of the buildings within the MOL would have unbuilt open sides, which creates a physical and visual connection between the internal courtyards, the new open space within the red line boundary, and the MOL.

Figure 16: A view from Springfield Park with the proposed development indicated by the green wire line

Figure 17: A view from Streatham Cemetery. The blue wireline represents the elements of the scheme which are within the MOL. The green wireline is outside the MOL.

81. GLA officers consider the development layout would lead to a more compact overall pattern of development compared to the existing development. The reduction in hardstanding and removal of the solid wall will improve the perception of openness of the MOL. The scheme will provide 2.7 acres of public open space and increased permeability through the site, including new links and seamless transition to Springfield Park and Streatham Cemetery, move built form away from the setting of the Grade II Listed Main Building, and provide a physical and visual connection from the Grade II Listed Elizabeth Newton Wing and Streatham Cemetery.

82. The site is enclosed by many established mature trees with as many as possible being retained. All trees proposed to be removed will be replaced. These trees will partially screen the development from the MOL. The development will achieve an Urban Greening Factor of 0.41 and Biodiversity Net Gain of 25%.

83. Consideration has also been given to the existing development which sits outside the MOL. Directly to the west of Springfield Park and Streatham Cemetery is a large residential development containing several buildings which are up to 5-storeys in height and contain significant hardstanding including roads and car parks. The buildings directly overlook the MOL and are highly visible from the MOL. Along with this development, the Main Building is up to 4-storeys in height and overlooks Springfield Park and a residential development up to 8-storeys in height on Garratt Lane overlooks Streatham Cemetery. All other development is smaller-scale residential development of 2-storeys in height. Given this context, it is considered that MOL openness in both Springfield Park and Streatham Cemetery is diminished. Although this development marginally encroaches into

the MOL, it is considered to have less of a visual impact than the buildings listed above due to its architectural response and landscape-led approach.

84. The proposed development would provide 50% affordable housing by habitable room. This would contribute towards local affordable housing targets to meet an identified housing need in the area.

MOL conclusion

85. GLA officers conclude that the site is PDL and a VSC case is not required. Whilst there is some harm to openness due to the increased volume and height of the proposed buildings, it is not considered substantial as it will result in a more compact form of development and introduce significant public realm, landscaping, biodiversity, and open space improvements. Therefore, the development is considered to meet the exception in Part 154(g) in that it would not cause substantial harm to the openness of the Green Belt, would re-use previously developed land, and contribute to meeting an identified affordable housing need within the area of the local planning authority. As such, the scheme satisfies the requirements of the NPPF, Policy G3 of the London Plan, and Policy LP53 of the Local Plan and does not comprise inappropriate development in the MOL.

Principle of residential development

86. Housing delivery is a key planning objective at national, regional and local level. Section 5 of the NPPF acknowledges the need to deliver a sufficient supply of housing. Section 11 promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.

87. Policies GG2 and GG4 of the London Plan support this position. Policy H1 of the London Plan states that to ensure LPAs achieve their ten-year housing targets boroughs should seek to optimise the potential for housing delivery on all suitable and available brownfield sites. Table 4.1 of the London Plan sets Wandsworth a completion target of 19,500 units between 2019/20 and 2028/29. Policy H4 of the London Plan identifies a strategic target of 50% of all new homes delivered across London to be genuinely affordable. It is noted that the site is allocated for residential development in the Local Plan.

88. LP23 of the Local Plan states that the Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. Affordable housing will be required to be provided on site with an affordable housing tenure split of at least 50% low-cost rent products.

89. The proposed development includes 449 residential units which would assist with meeting the housing needs of the borough, including providing a significant level of affordable housing units. The proposal includes 50% affordable housing by habitable room with 50% being social rent and 50% London Shared Ownership.

90. The 449 residential units would equate to 23% of Wandsworth's current annualised housing target of 1,950 and 1.2% of the borough's 10-year London Plan target of 37,730 net housing completions. While it is noted that the borough

is generally performing well against the London Plan housing targets, in the context of London's overall housing need, the proposed development would make a meaningful contribution towards the delivery of housing, in line with Policy H1. It is noted that the development represents an uplift of 360 residential units compared to the extant consent.

91. The provision of 220 affordable homes (indicative), would contribute towards the Mayor's strategic target of 43,500 affordable homes per year. The proposed development would be equivalent to 0.5% of London's annual affordable housing need, which is not considered to be an insignificant amount on a singular, relatively modest sized site. At a local scale, the proposed affordable housing offer would equate to approximately 22.5% of the targeted 975 affordable dwellings per year.

92. Overall, the principle of residential units is supported, subject to the detailed considerations below.

Loss of existing health facilities and social infrastructure

93. The applicant has confirmed that the Shaftesbury Building is now vacant following the move of the services which previously operated in the building into the new hospital on the wider Springfield Hospital site in 2023. The Morrison Building will remain operational until 2027 when the services and users will move to Tolworth Hospital in the Royal Borough of Kingston upon Thames. The Morrison Building will not be decanted until the services are ready within Tolworth Hospital.

94. Given the existing services and users are being relocated to new facilities, and the existing buildings are not fit for purpose, the loss of the existing health facilities is accepted, in line with Policy S1 of the London Plan. It is considered that these arrangements will mitigate any impacts to people with protected characteristics, in accordance with Objective GG1 of the London Plan and the Equality Act 2010.

Summary

95. The principle of the re-development of the wider Springfield Hospital site was established under the consented scheme, as well as formalised in the local site allocation. The relocation of the services and users of the existing health facilities have been appropriately considered. The development would not cause substantial harm to the openness of the MOL, would re-use previously developed land, and contribute to meeting an identified an affordable housing need within the area of the local planning authority, in line with the NPPF. The delivery of 449 residential units as 50% affordable housing is strongly supported and would contribute to London and local housing targets. Therefore, the application satisfies the requirements of the NPPF, London Plan and local policies.

Housing

Affordable housing

96. Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

97. Policies H4, H5 and H6 of the London Plan promote the maximisation of affordable housing delivery and ensuring that supply is genuinely affordable. Policy H4 and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

98. Policy H6 of the London Plan and the Mayor's Affordable Housing and Viability SPG set out a preferred tenure split of at least 30% low-cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low-cost rented homes or intermediate based on identified need. There is a presumption that the 40% to be decided by the borough will focus on low-cost rent, however in some cases a more flexible tenure may be appropriate, for example to achieve mixed and inclusive communities. In this case, locally, Policy LP23 of the Local Plan sets a strategic target to achieve 50% of affordable housing of at least 50% low-cost rent products, with a balance of other intermediate products.

99. The proposed development includes 50% affordable housing by habitable room consisting of 50% social rent and 50% London Shared Ownership. The tenure and unit mix are as follows:

	Count	Unit Mix	Hab/Rooms	Tot Hab/Rooms	Tenure Split	
PRIVATE FOR SALE						Affordable Split
1B1P	5	2%	1	5		
1B2P	57	25%	2	114		
1B2P - WCU	23	10%	2	46		
2B3P	122	53%	3	366	50%	
3B4P	13	6%	4	52		
3B5P	9	4%	4	36		
Totals	**229**	**100%**		**619**		
INTERMEDIATE						
1B2P	60	48%	2	120		
1B2P - WCU	11	9%	2	22		
2B3P	54	43%	3	162		50%
2B3P - WCU	0	0%	3	0		
2B4P	0	0%	3	0		
3B5P	0	0%	4	0		
Totals	**125**	**100%**		**304**	50%	
SOCIAL RENTED						
1B2P	11	12%	2	22		
2B3P - WCU	7	7%	3	21		
2B3P	6	6%	3	18		50%
2B4P	36	38%	3	108		
3B4P - WCU	4	4%	4	16		
3B5P	31	33%	4	124		
Totals	**95**	100%		**309**		
Total	**449**			**1232**		

Figure 18: The proposed unit and tenure mix

100. Affordability levels and an early-stage review have been secured in the S106 agreement.

101. The affordable housing provision is considered to be acceptable and therefore satisfies the requirements of the NPPF, Policy H4, H5 and H6 of the London Plan and Policy LP23 of the Local Plan.

Housing mix

102. Out of the 449 residential units, there would be 167 one-bedroom units, 225 two-bedroom units and 57 three-bedroom units. Of these 229 would be private market units and 220 would be affordable units. Within the market units the dwelling size mix would comprise 85 (37%) one-bedroom units, 122 (53%) two-bedroom units and 22 (10%) three-bedroom units. 5 of the proposed units within the market offer would be one-person units, equating to 2% of this tenure. Within the affordable homes 82 (37%) would be one-bedroom units, 103 (46%) would be two-bedroom units and 35 (15%) would be three-bedroom units.

103. Overall, the proposed housing mix is considered acceptable and satisfies the requirements of Policy H10 of the London Plan and Policy LP24 of the Local Plan.

Standard of accommodation

Unit sizes

104. All of the residential units within the proposed development would be compliant with the respective minimum gross internal floorspace areas set out within the national space standards. The 1-bedroom 1-person units would be 37 sq.m.; the 1 bedroom 2-person units range from 50 to 61 sq.m.; the 2-bedroom 3-person units range from 64 sq.m. up to 76 sq.m.; the 2-bedroom 4 person units range from 71 sq.m. up to 76 sq.m.; the 3-bedroom 4-person units range from 75 sq.m. to 90 sq.m.; the 3-bedroom 5-person units range from 87 sq.m. up to 90 sq.m. and the largest residential units, the townhouses, which are 3-bedroom 6 person units would be 122 sq.m.

105. The proposed development provides ceiling heights of 2.5 metres for bedrooms and combined living / kitchen / dining rooms, and 2.4 metres for kitchens, bathrooms and corridors. This complies with the nationally described space standards and London Plan requirements.

Daylight, outlook and privacy for future occupants

106. 207 residential units (46%) would be true dual aspect; 53 units (12%) would have elements of their design layout providing a degree of dual aspect; and 189 units (42%) would be single aspect.

107. The applicant has submitted an internal daylight and sunlight assessment which undertakes a detailed technical analysis of daylight and sunlight within the development with reference to BRE Guidelines and other relevant target criteria.

108. The assessment found that out of the 1,246 habitable rooms assessed, 64% of these would meet the minimum daylight criteria and 51% would meet the minimum sunlight criteria. This is primarily attributed to the habitable rooms facing the courtyards. In residential units of non-compliance, there are open plan multi-use living / kitchen and dining areas, as well as balconies, which would enable access to sufficient levels of daylight and sunlight. This level of non-compliance is considered, on balance, to be reasonable for a development of this scale and nature, particularly as a large proportion of the facades are orientated within 90 degrees of due north.

109. All properties would benefit from a good outlook, with those units located at ground floor level having appropriate measures in place such as landscaping or enclosed patios to provide a defensible space in front of windows to ensure good levels of privacy would be maintained for future occupiers.

Noise and overheating

110. The applicant has submitted a noise assessment which states that suitable acoustic glazing specification and façade construction would mitigate internal noise levels within the residential units, in line with the British Standard and World Health Organisation guidelines.

111. The applicant proposes to implement passive and active design measures to mitigate the risk of overheating. Passive measures are prioritised in accordance with the heating and cooling hierarchies and include the specification of glazing thermal performance, orientation and layout, and the use of thermal mass. Energy efficient lighting and appliances are also specified to minimise internal heat gains. Purge ventilation through openable windows would also be utilised as essential to mitigating the risk of overheating. Active measures would include mechanical ventilation, however, no active cooling is proposed to be provided to the residential units. Appropriate measures to control overheating are secured by condition (Condition 27).

Amenity space

112. The proposed development would include a total of 7,163 sq.m. of amenity space for its residents (3,571 sq.m. of which will be private), which exceeds the 4,775 sq.m. as required by policy. All balconies would be between 5 sq.m. and 10 sq.m., while the ground floor terraces would be up to 23 sq.m.

Conclusion

113. Therefore, the application satisfies the requirements of Policy D6 of the London Plan and Policy LP27 of the Local Plan.

Inclusive access

114. The application proposes that 10% (45) of dwellings would be built to meet Building Regulation M4(3) 'wheelchair user dwelling' requirement with the remaining 90% designed to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

115. The M4(3) wheelchair units would be spread across the range of tenure types and would be located such that they provide a range of aspects and floor level location. The wheelchair user dwellings would also have access to two lifts, would be in close proximity to accessible car parking and drop-off points and would not be clustered together.

116. Disabled persons parking will also be provided in accordance with the London Plan, which requires provision for 3% of dwellings. This is discussed further in the transport section of this report.

117. Design details have been secured by condition (Condition 15).

118. The application satisfies the requirements of Policy D5 of the London Plan and Policy LP27 of the Local Plan.

Children's play space

119. The proposed development would deliver 2,053 sq.m. of play space, including 731 sq.m. for 0-4 year olds, 540 sq.m. for 5-11 year olds and 335 sq.m. for 12-17 years olds. This provision exceeds the minimum requirement of 1,604.6 sq.m. as per the GLA play space calculator.

120. GLA officers consider the approach to play space is well-considered with a wide variety of play spaces for different age groups. Further details on play equipment have been secured by condition (Condition 18). The proposal satisfies the requirements of Policy S4 of the London Plan and Policy LP19 of the Local Plan.

Urban design

Design scrutiny

121. During the preparation of the planning application, the applicant team met with the Wandsworth Design Review Panel (DRP) on 4 August 2022 and 20 September 2022.

122. The DRP noted that they were pleased to see this development come forward and praised the applicant for reconfiguring the plots to pull the development away from the listed main hospital building, the retention of mature trees, and the creation of a more landscape-led scheme compared to the previous consent. The DRP noted that they were pleased with the general arrangement of the site and encouraged the applicant to carefully consider the routes through the site, massing of the buildings, hard and soft landscaping, design of amenity spaces, separation distances, internal layouts, transport arrangements, and sustainability.

123. A number of changes to the height, form and orientation of the blocks were carried out through the design evolution before submitting this current scheme.

124. Overall, it is considered the proposed development had appropriate design scrutiny and therefore satisfies the requirements of Policy D4 of the London and Policy LP1 of the Local Plan.

Height, scale, and massing

125. The proposed development includes 5 buildings including Block A and B, at 4-storeys in height, Block C and D at 5-storeys in height, and Block E (townhouses) at 3-storeys in height. The buildings are not considered tall buildings in accordance with Policy D9 of the London Plan and Policy LP4 of the Local Plan, which considers buildings 5-storeys as ‘mid-rise’.

126. Block A and B, and the 9 townhouses, are less than 5-storeys in height and are considered an appropriate height in this location, subject to other material planning considerations. Blocks C and D are 5-storeys in height and therefore require further scrutiny. It is noted that local policy allows for a degree of flexibility subject to a detailed assessment.

127. Blocks C and D would be located at the northern and eastern ends of the site, which is considered less sensitive to height than the southern part of the site which falls within the MOL, but are near to the listed buildings. A full analysis of the impacts to these listed buildings is provided in the Heritage section of this report. The buildings would work with the existing topography of the site to add variation in ground levels, as well as introduce variations in architecture and materials which assist in visually breaking up the mass.

128. The applicant has submitted a Townscape, Visual and Built Heritage Impact Assessment (TVBHIA), which forms Volume 2 of the ES. The TVBHIA demonstrates that the provision of the 3-storey townhouses provides an appropriate height transition between the existing residential properties on John Hunter Avenue and the taller elements within the site. The TVBHIA also demonstrates that the development steps down to 3-storeys towards the MOL, which reduces the impacts on the MOL openness and introduces spatial improvements compared to the existing situation and consented scheme which provides a strong visual and physical connection between the Grade II Listed Elizabeth Newton Wing and Streatham Cemetery to the south and move built form away from the setting of the Grade II Listed Main Building. Many existing mature trees will be retained, and the introduction of further tree planting will effectively screen the buildings.

129. In the GLA Stage 1 report, GLA officers concluded that a reduction of one storey to Block C would be required to reduce the visual impact of the development. During the assessment of this application, the applicant provided an updated TVBHIA and VuCity model which demonstrates that the current proposed height of Block C will have an acceptable visual impact and is therefore supported.

130. Overall, the height and scale of the proposed development is considered appropriate and therefore satisfies the requirements of Policy LP4 of the Local Plan.

Figure 19: The massing strategy in the context of the wider hospital site

Development layout

131. The layout of the buildings forms simple perimeter blocks set around a central internal courtyard amenity area, with breaks in part of the built form to allow visual permeability into these central areas. The relationship between public and private space has been carefully considered to ensure the layout provides an appropriate relationship between the two.

132. Block A at the western end of the site would have its open side facing out towards the park and Streatham Cemetery with those parts of the building adjacent to the open entrance to the courtyard being the lowest elements at 3-storeys high. This would help maintain the visual connection between these two open spaces.

133. The proposed development will deliver new access routes through the site, linking the park and cemetery with the development and wider Springfield Hospital site, which improves permeability and activity. The reduction in car parking and rationalisation of the road network allows for additional landscaping as well as improving connectivity. The reorientation of the buildings compared to the extant consent will provide strong visual and physical connection between the Elizabeth Newtown Wing / John Hunter Avenue to the north and Streatham Cemetery to the south and move built form away from the setting of the listed Springfield Hospital Main Building.

134. Further details on hard and soft landscaping and public realm have been secured by condition (Condition 17).

135. Overall, the development layout is appropriate and therefore satisfies the requirements of Policy D4 of the Local Plan and Policy LP4 of the Local Plan.

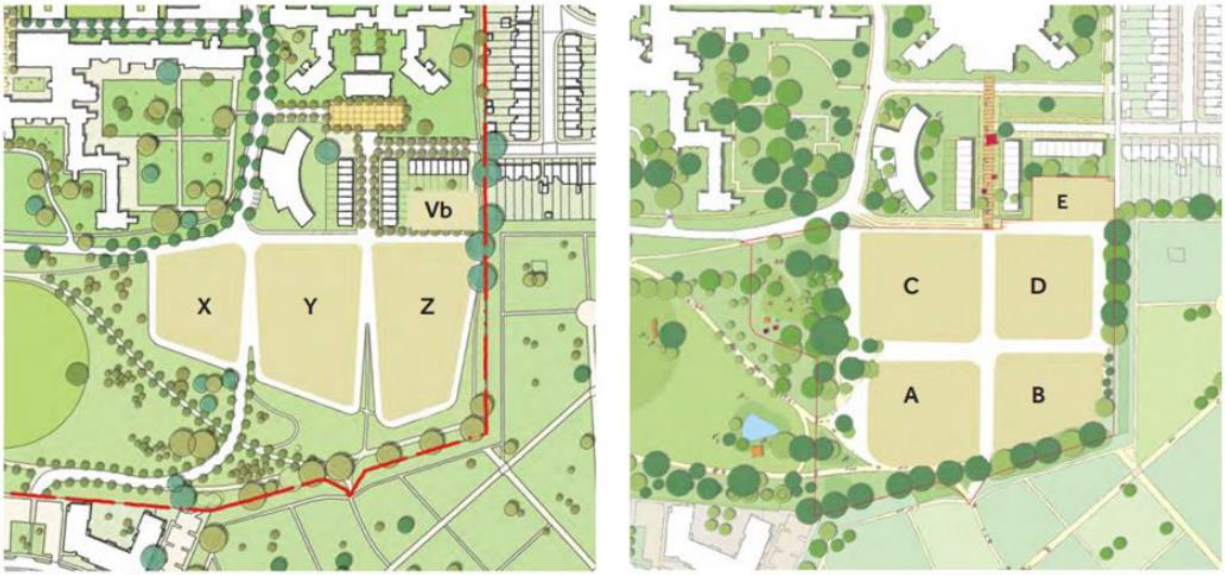

Figure 20: Layout under the outline permission (left) and proposed layout (right)

Architecture and materials

136. The proposed development would deliver simple contemporary flatted blocks which follow the general design principles of other new buildings within the wider

Springfield Hospital site, as well as reference the historic hospital buildings. Consideration has been given to breaking up the visual mass of the long elevations, as well as introducing articulation, variation in fenestration and balconies to activate frontages and create visual interest, and variation in detailing, materials, and façade treatments that give each block its own identity. The design of the townhouse reflects the design characteristics included on the flatted blocks but adjusted to reflect their different scale and form.

137. The design of each of the blocks has considered the surrounding landscape with staggered building frontages which form pocket spaces that are complemented by landscaping. Block A which opens onto the park lowers to 3-storeys adjacent to the open space at the entrance to its central courtyard, helping to meld the landscape between the public and private space to a greater extent.

138. The proposed material palette consists of a textured red brick as the dominant main façade material, as well as a lighter buff coloured textured brick which provides variety, accent, and lightness to other parts of the building. The brickwork would be complemented by the architectural expression of the buildings and other detailing, including balcony railings, which contribute towards an appropriate façade treatment.

139. A condition is secured regarding submission of further details of all external materials including brick types, brick bonds and materials for windows, balconies, and roof areas prior to commencement of above ground works in order to ensure the indicative high quality of materiality is maintained at final detailed design stage (Condition 14).

140. Overall, the architecture and materials are considered appropriate. Subject to the recommended conditions, the proposed development satisfies the design requirements of the NPPF, Policy D4 of the London Plan, and Policies LP1 and LP3 of the Local Plan.

Figure 21: An example elevation illustrating the façade treatment

Landscaping and public realm

141. The development would deliver high quality landscaping reflecting the MOL designation and would complement the character of the adjacent Springfield Park and Streatham Cemetery. The landscaping proposals would see the proposed development increasing both the quantum of publicly accessible open space and the useability of this space. This would include the delivery of an extension to the publicly accessible Springfield Park, which provides a benefit to both residents and users of the wider hospital site, local neighbours and those from further afield.

142. The scheme would also deliver new and improved areas of public realm. This would include the formation of new pedestrian routes, including a link through to Streatham Cemetery. This would provide a public benefit by ensuring the delivery of improved connectivity and permeability within and through the site to the benefit of occupiers and users of this and adjacent sites. This connection is secured in the S106 agreement.

143. Final details on hard and soft landscaping have been secured by condition (Condition 21). A management and maintenance strategy for public realm and landscaping has been secured by condition (Condition 45).

144. Overall, the proposed landscaping and public realm is considered acceptable and therefore satisfies the requirements of Policy D8 of the London Plan and Policy LP54 and LP56 of the Local Plan.

Figure 22: Development layout with landscaping proposals

Fire safety

145. Policy D12 of the London Plan requires a fire statement prepared by a suitably qualified third-party assessor, demonstrating how the proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

146. It is noted that all buildings are below 18 metres in height and therefore a second stair is not required as per the most up to date guidance.

147. A fire statement has been submitted with the planning application, which meets the requirements of Policy D12 of the London Plan. Compliance with the fire statement is secured by condition (Condition 38).

Conclusion on urban design

148. The design and layout principles of the scheme are well-considered in the context of the site constraints and would optimise development capacity. The proposal includes the delivery of up to 2.7 acres of public open space and introduces high-quality landscaping and public routes through the site. The height and massing of the buildings responds well to the topography of the site and interacts well with the MOL. The proposals have been subject to design scrutiny. The architecture and materials are high-quality and would contribute positively to the surrounding area and have been appropriately secured. The proposal is considered to accord with the design policies of the London Plan and the Local Plan.

Heritage

Legislation, policy, and guidance

149. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” and, in relation to conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”.

150. The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal. The effect of development on the significance of any non-designated

heritage assets should also be taken into account. In weighing applications that affect non-designated heritage assets, a balanced judgment will be required having regard to any harm or loss of significance to the asset.

151. Policy HC1 of the London Plan requires development proposals to conserve significance by being sympathetic to the assets' significance and appreciation within their surroundings and avoid harm and identify enhancement opportunities by integrating heritage considerations early in the design process.

152. Policy LP3 of the Local Plan states that applications will be supported where they sustain, conserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset itself, and the surrounding historic environment.

153. The site is in the setting of the following heritage assets:

- Springfield Hospital Registered Park and Garden (RPG), (listed Grade II);
- Springfield Hospital (Main Building) (listed Grade II);
- Elizabeth Newton Wing (listed Grade II);
- Icehouse at Springfield Farm (listed Grade II);
- Gatton Primary School (listed Grade II);
- Lodge to St Clements Danes Almshouses (listed Grade II);
- Magdalen Park Conservation Area;
- The former Chapel of Springfield Hospital, 61 Glenburnie Road (locally listed)
- Streatham Cemetery (locally listed);
- Garratt Green (locally listed).

Springfield Hospital Registered Park and Garden (RPG), Grade II

Significance

154. The hospital parkland was created in 1841-2 as a setting and curtilage for the Surrey County Lunatic Asylum (now the listed Springfield Hospital (Main Building), see below). The asylum was built on agricultural land forming part of Springfield Farm (of which only the icehouse now survives, see below). The choice of site was deliberate: at this time this area was open downland country. The site allowed the privacy, physical remoteness and seclusion which were considered key to the asylum concept; the location of the grand asylum on a southwest facing ridge allowed extensive views of open countryside as well as providing a dignified setting in the manner of a country house, adding to the prestige of the institution.

155. The design of the hospital parkland, which included six airing courts, linked to the male and female wards of the hospital. These were originally secured by a large

ha-ha, these spaces allowed patients space to exercise, play games and enjoy fresh air, but not to leave. The courts included trees for shade, some covered elements against the weather and toilet facilities. It was clearly intended that large parts of the day would be spent outdoors. Other areas were cleared and levelled for games, such as the creation of a bowling green, and elsewhere the laying out of cricket pitches and tennis courts. The parkland also featured country house features such as entrance lodges, drives and a carriage turn route.

156. The RPG has archaeological value since its surviving elements form direct evidence of these past attitudes and practices. It has artistic value as a designed landscape of some beauty which sets off the hospital, particularly in the more intact front lawn setting of the building with the Cedars of Lebanon. The RPG has historic value because its surviving design form and features illustrate the history of reform in the treatment of mental illness. There is a small element of communal value since the hospital parkland has been used by generations of staff and patients, as well as public golf course users.

Contribution made by setting to significance

157. The setting of the RPG has changed over time. Originally the land around was open farmland. With the exception of Streatham Cemetery to the south, this has generally been suburbanised by London's growth.

158. The site contributes positively to the setting of the RPG, since the belt of trees forms a clear boundary. This belt may be a hedgerow which has grown out, or a hedgerow which has been supplemented with planting, or may be a designed, planted feature. The trees in it may date to 1842 or may be succession planting or self-seeded, but it remains a feature of historic interest. The existing buildings on site, particularly the Diamond Estate and the Shaftesbury Building sit low in the landscape and are effectively screened in most views from the RPG, and this contributes positively to the setting of the RPG by providing a non-obtrusive apparently semi-rural setting in some views.

Heritage impacts

159. There is no built development proposed on the small area of the RPG which falls within the red line boundary.

160. The small area of land to the northwest of the belt of trees is proposed to be laid to grassland and this is an enhancement to the RPG over the current situation where it is mainly hardstanding and car parking. This is considered to be a heritage benefit.

161. The belt of trees forms part of TPO182 (23 trees/tree groups), most of which are proposed to be retained and this is welcomed in conservation terms. It is proposed to include a public play area ("Play in the woods") under the trees, with some associated pathways and this an appropriate element in the RPG. A tree protection condition has been secured (Condition 12).

162. As shown in BHTVIA Views 1, 2, 3, 5, 6, 7, 9, 10, 11 and 12 and TVIA Addendum Views 1, 6, 9 and 10, this Block C will rise above the treeline of the belt of trees even in the summer months. This causes harm to the contribution made by setting to the significance of the RPG since it introduces an urbanising and uncharacteristic element into the setting, distracting from the historic parkland

quality of the RPG. The harm is considered to be less than substantial, at the low end of the spectrum.

Other buildings on site

163. The Diamond Estate, a group of 21 staff residential buildings, was built around 1986. In views from the cemetery, the Diamond Estate screens visibility of the Springfield Hospital complex, therefore creating a physical, built barrier between the Registered Park and Garden, the Cemetery and the Hospital. These buildings have no heritage significance.

164. The Shaftesbury Clinic was built in 1992 and does not have heritage significance.

165. The Morrison Building is a two-storey building accessed along Jupiter Way, to the immediate south of the listed part of Springfield Hospital and to the south west of the listed Elizabeth Newton Wing. The Morrison Building is separated from the Springfield Hospital buildings by dense foliage associated with airing gardens, which form part of the Springfield Hospital RPG. This separation, and likely different uses of the Morrison Building (this was an Infirmary Block) to the main hospital building, waters down its spatial and historical relationship. The 2012 appeal decision clarified that the building is curtilage listed, since it forms part of the listed hospital and pre-dates 1948, although that decision also gave Listed Building Consent for its demolition.

166. The demolition of these three buildings has been previously consented as part of the outline consent. The Diamond Estate and the Shaftesbury Clinic are of no significance. The Morrison Building is considered to be of low to moderate importance and clear justification has been provided to support its demolition. GLA officers raise no objection in this regard.

Springfield Hospital (Main Building), listed Grade II

Significance

167. The Main Building was constructed between c1838-41 as the Surrey Country Lunatic Asylum, with extensions in 1874 and the later 19th century. It was constructed as a purpose-built mental health asylum and is a grand symmetrical Tudor-style composition enclosing a large courtyard. As noted above, its location on the south facing ridge is dramatic and the overall effect of the southwest elevation with the Cedar of Lebanon trees is striking.

168. The building has archaeological interest since its surviving element provide direct evidence of the past treatment of mental illness. The building has architectural value since it is a major work by a talented and well-regarded architect of the period. The building has some of the design elements of a country mansion and there is an element of the “telegraph pole” planning reflective of the desire for fresh air and ventilation spaces between buildings. The building has artistic value in the use of high-quality craft skills in its construction, materials and details and in the successful use of a Tudor Revival style on the grand scale, with echoes of Hampton Court Palace.

Contribution made by setting to significance

169. The setting of the hospital is mainly the RPG discussed above. This setting contributes highly to significance since is historically linked to the building, its

history, function, and significance. The setting also allows the significance of the hospital to be appreciated, particularly in views from the southwest. The site of proposed development contributes to significance since the belt of trees forms part of the historic boundary layout and serves to shield the existing buildings behind from view.

Heritage impacts

170. Block C is five storeys (39.63m AOD) in height. This block is located at relatively close to the southeast corner of the listed building and is taller than the listed building (which is 38.32m AOD). As shown in BHTVIA Views 1, 2, 6, 9, 10 and 11 and TVIA Addendum Views 1, 6, 9 and 10, this block will rise above the treeline of the belt of trees even in summer months. Block C will slightly challenge the scale of the listed building and will intrude into the view of this part of the listed building, distracting from the primacy of the listed building in the view (shown for example in View 10). This causes harm to the contribution made by setting to the significance of the listed building, although it is acknowledged that this is not the main axial view of the principal elevation. The harm is considered to be less than substantial at the low end of the range.

Elizabeth Newton Wing, listed Grade II

Significance

171. The Elizabeth Newton Wing was constructed in 1895 and provided separate facilities for the treatment of children with mental disabilities rather than mental illness and is an unusual building to find on a Victorian asylum site.

172. The Elizabeth Newton wing is faced in red brick with stone dressings under a slate roof with tall, brick chimney stacks. The central roof on the front (southwest facing) range is gabled with a cupola. It is in the Tudor Revival style to match the Main Building, albeit on a more domestic scale as befitting its original uses for children's services.

173. The buildings ground plan, described by Historic England as a "small echelon-type plan" with 4 ward wings, these featuring "diagonally-set echelon pavilions with battlemented stair tower on the inner angles and similar but wider day-room towers with canted bay windows at the distal ends." The interior has a central dining hall with arch-braced timber roof and central clerestory.

174. The building has archaeological value since surviving elements directly evidence late Victorian approaches to the care of children with disabilities. The building has architectural and artistic value since it is an excellent building by an accomplished architect of the time, with an impressive entrance sequence, unusual form and the use of high-quality craft skills, materials and details. The building has historic interest since it illustrates the pioneering changes to the treatment of children with disabilities in the late 19th century. There may be an element of communal value since it is essentially a public building, with strong associations for many former staff, patients and others. The building has strong group value with the listed Main Building and associated RPG.

Contribution made by setting to significance

175. The historical connections between the building and the Main Hospital and the RPG add to significance. The building gains significance from its location within the curtilage of the main listed building and its co-location with it. There are some visual connections between the building and the Main Hospital. Map regression shows that the building, like the Main Hospital, historically faced southwest across open countryside (now the site of proposed development) and the cemetery. This view was partially blocked and the sensation of direct physical and visual access was harmed by the erection of the Morrison Building circa 1931, which stands in front of this building.

176. The immediate setting of the building is now the modern development to the immediate south and north, including John Hunter Avenue. This frames and provides an axial vista of the main entrance tower of the building, although this effect is interrupted by the Morrison Building. Both Glenburnie Road (in front of the building) and John Hunter Avenue are currently dead ends, leaving the building truncated in terms of legibility of access.

Heritage impacts

177. Blocks C and D are 5 storeys (39.63m AOD) in height. These blocks are located relatively close to the main southwest elevation of the listed building. As shown in BHTVIA Views 1, 7 and 9 and TVIA Addendum Views 1 and 9, these blocks will rise above the treeline of the belt of trees even in summer months. Blocks C and D will slightly challenge the scale of the listed building and will intrude into the setting of the listed building, particularly in views from the southwest such as Views 1 and 9, distracting from the primacy of the listed building in the view. This causes harm to the contribution made by setting to the significance of the listed building, although it is acknowledged that this is not the main axial view of the principal elevation. This harm is considered to be less than substantial at the low end of the range.

Icehouse at Springfield Farm, listed Grade II

178. This icehouse likely dates from the 18th century and is the last remaining building of the estate at Springfield Farm. It consists of a circular domical subterranean building made of brown and yellow brick. The icehouse is covered in earth, creating a mound that has retaining walls to the approach. In use, ice was collected from shallow ponds built for the purpose in the winter months.

179. The building has archaeological value since it evidences past lifestyles and the construction of these unique buildings. The building has historical value as a structure relating to the lost estate at Springfield Farm, in place before the hospital.

180. The setting of the icehouse makes some contribution to significance. There are historical links with the hospital, since the farm later formed part of the curtilage of the institution and was used for occupational therapy. The visual setting of the ice house has now changed beyond recognition (it is now in the grounds of Burntwood School) and this contributes nothing to significance.

181. The proposed development causes no harm to the significance of this building.

Gatton Primary School, listed Grade II

182. This building was originally known as Broadwater Road School and is listed under that name. It was previously known as Wandsworth College Broadway Centre and the Ensham Secondary School Annexe, but is now Gatton Primary School. This was built around 1900 (opening in 1904) for School Board for London, designed by Thomas Jerram Bailey (1843-1910). The building is a fine example of Bailey's later, Edwardian manner, using yellow stock bricks, stone and red brick dressings with tile roofs.

183. The building has evidential value since it shows late Victorian and early Edwardian school planning. The building has architectural and artistic value since it is a striking and handsome building by the leading school architect of the period, with fine and well-crafted materials and details, together with a dramatic and unusual massing and form.

184. The setting of the school is mainly defined by its walled curtilage, which is retained. The wider urban setting is middle 20th century houses, which is later than the school and does little to contribute to significance. There is no historical, spatial or visual relationship with the site.

185. There is no mutual intervisibility between this building and the site. No harm is considered to arise to this building as a result of the scheme**.**

Lodge to St Clement Danes Almshouses, listed Grade II

186. The Lodge to St Clement Danes Almshouses is a Gothic Revival building by architect Robert Hesketh RIBA (1817-1880) and dates from 1848. The Lodge consists of a single storey made of red brick with stone dressings, grey brick diaper, and tiled saddleback roof. The building has archaeological value as evidence of mid-Victorian almshouse construction. The building has historical value through its age and survival. The building has architectural value through its forms and architectural features which relate to the range of almshouses and chapel to the immediate south. The building has historical value through its association with contemporary philanthropy and the work of Hesketh. The building has group value through its association with the almshouses and their chapel and the nearby listed Church of St Mary (Summers Town).

187. The building's setting is defined by the open space and courtyard of the almshouses to the south of the Lodge. The spatial relationship between these freestanding buildings accounts for a significant amount of open space between the structures. The Lodge is best viewed from Garratt Lane with the almshouses seen in the distance. There is no historical or visual connection with the site.

188. TVIA Addendum VuCity Model Shot 1 page 14, Shot 2 page 15 and Shot 3 page 16 show that there is no mutual intervisibility between this building and the site. No harm is considered to arise to this building as a result of the scheme.

Magdalen Park Conservation Area

<u>Significance</u>

189. Magdalen Park Conservation Area was built on land belonging to Magdalen College, Oxford after 1868. It derives its historical and architectural significance from the presence of the Fieldview and Openview Estates. These were designed

from 1911 by the Holloway Brothers (including Sir Henry William Hollway) and later by architects H F Murrell and R M Piggott FRIBA between 1931 and 1938. Its reasons for designation include its exceptional example as an inter-war planned housing estate, and for the design of its buildings and the overall layout of the estates.

Contribution made by setting to significance

190. Green space within the setting contributes greatly to the heritage value of the Magdalen Park Conservation Area as well as its proximity to heritage assets such as Springfield Hospital and its associated listed buildings and RPG. The residential character of the surrounding vicinity ties in with Magdalen Park Conservation Area's historically and architecturally significant housing estates, creating a continuity in character beyond the borders of the Conservation Area and high permeability for residents.

Heritage impacts

191. In BHTVIA View 8 the proposed development is shown in the setting of the Magdalen Park Conservation Area. The development is not visible in this view. No harm is considered to arise to this building as a result of the scheme.

The former Chapel of Springfield Hospital, 61 Glenburnie Road.

192. As noted above, this building is curtilage listed as part of the hospital Main Building. The building is also locally listed by the London Borough of Wandsworth. The chapel was a later addition to the hospital and appears on maps after 1869 and before 1894. No information is available on its architect or precise date. Its function was to provide a space of religious assembly for staff and patients at the hospital.

193. The building is Gothic Revival style and roughly cruciform in plan, with liturgical east actually at northeast. The building features a chancel, north and south transepts, two vestries and a wide chancel with both north and south aisles to accommodate a large congregation.

194. The building has significance as a well-designed late Victorian asylum chapel with materials and details characteristic of the period, reflecting the contemporary interest in the religious well-being of staff and patients. The significance derived from setting mainly relates to its co-location with the listed hospital buildings and the visual and historical links this provides.

195. There is no intervisibility between the chapel and the proposed development. No harm is considered to arise to this building as a result of the scheme.

Streatham Cemetery

196. The cemetery including the two chapels within it are locally listed by the London Borough of Wandsworth.

197. Streatham Burial Board acquired land to the south of the hospital for use as a cemetery under the Metropolitan Burial Act 1852. This land remained unused for several decades and was separated from the hospital by a boundary of trees. The 23 acre Streatham Cemetery opened for burials in 1893. The cemetery featured two Gothic Revival chapels of grey ragstone designed by William Newton-Dunn.

Its setting within the local community and its open character in an increasingly dense area strengthens its heritage value.

198. The built relationship between the cemetery and the site is currently very poor, consisting of a mid-20th century concrete plank fence, with no route through between the two sites. There are some loose historical links between the cemetery and the site, as areas of open land in institutional use and it appears likely that some patients of the hospital may have been buried here (unusually there appears to be no known asylum cemetery). The site contributes positively to the setting of the cemetery, since the belt of trees to the southern perimeter of the site serve to provide a calm and attractively sylvan setting to the cemetery.

199. Direct works are proposed (DAS Para 6.1) to create a new pathway through the cemetery, leading to a new entrance between the site and the cemetery, framed by an area of railings and an arched opening, which in turn leads to a cultural park with wood carvings proposed. These proposals are welcomed and would create a heritage benefit, with part of the concrete fence removed and a useful and attractive route through provided, increasing the usability of both the cemetery and the site and knitting the cemetery closer into the scheme.

200. The visual impact of the proposed development has been thoroughly reviewed and is illustrated in BHTVIA Views 3, 4, 5 and 12 and TVIA Addendum Views 14a and 14b. In some views the proposed development will rise above the treeline to some extent and will occasionally be clearly visible. This causes harm to the contribution made by setting to the significance of the Non-Designated Heritage Asset, since it erodes the calm and sylvan setting. This is considered to cause harm at a low level, which is taken into account in the overall planning balance.

201. The proposed details of the new link between the cemetery and the site are currently available in sketch form only (DAS Para 6.1 and Archaeological Desk-Based Assessment Part 2 Figure 19a). While what is proposed appears appropriate in principle, a condition is secured to provide the relevant details (Condition 44). The delivery of the route and culture park is secured in the S106 agreement.

Garratt Green (locally listed).

202. Garratt Green is a nearby open space which is locally listed by the London Borough of Wandsworth. It is located to the east of the Springfield Hospital Main Building. The open space is documented to have existed since at least 1746 and may well be much older. Garratt Green functioned as common land (for grazing) and has survived as an open space along the historic Burntwood Lane despite suburban development in the area over the centuries. It is Common Land and is protected in the relevant legislation. The land is a welcome breathing space locally and is bordered by mature trees.

203. There is no intervisibility between this asset and the site. No harm is considered to arise to this building as a result of the scheme.

<u>Summary of heritage benefits</u>

204. GLA officers consider the following to be heritage benefits:

- The creation of a new pedestrian connection between the site and Streatham Cemetery is positive and improves access and permeability within and towards this non-designated heritage asset. This benefit has been secured in the S106 agreement.
- The demolition of the Morrison Building and the proposed arrangement of Blocks A to D creates a new axial view of the main entrance and tower of the listed Elizabeth Newton Wing (illustrated at page 144 of the DAS). This provides an enhancement of the setting of this building by framing and highlighting one of its principal elements.

Commentary on the position of other parties

London Borough of Wandsworth

205. The Council committee report (19 March 2024), following an analysis (Paras 4.27 to 4.32) which has many commonalities with the above, concluded on heritage matters that: "Officers accept that the degree of harm identified would be comparatively minor, and they conclude this would be to the lower end of 'less than substantial' harm. Nevertheless, in accordance with paragraph 208 of the NPPF where it is considered a development would lead to 'less than substantial harm' to the significance of a designated heritage asset, whatever that degree of harm may be, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." GLA officers broadly agree with this conclusion.

206. It is noted that Wandsworth Council members refused the scheme. However, the reasons for refusal did not include a reason relating to heritage.

Historic England

207. Historic England responded to consultation with an email dated 25 January 2023 which stated that "On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England".

The Gardens Trust (London Parks and Gardens)

208. This statutory amenity society responded to consultation in a letter dated 1st February 2023 which stated: "This is not a good location for high buildings because of the visual impact on the Grade II listed main hospital building, Grade II listed hospital grounds and on the cemetery. LPG supports the retention of the trees between the development and the hospital building. LPG supports the retention of the trees along the southwest boundary with Streatham cemetery. LPG suggests a better tree screen along the southeast side to provide a visual break between the development and the cemetery. It is not clear how the proposed new pedestrian route through the cemetery can be made without disturbing a significant number of graves."

209. The visual impacts on the setting of the listed buildings, the RPG and the cemetery are discussed above. The proposals include the replacement of the trees which are removed on the site. Consideration has been given to the path and the graves and the proposals, which will be subject to condition, are intended to avoid the removal of graves.

Other consultees

210. A number of public consultees raise concerns around the impacts on the setting of the listed buildings, the RPG and the cemetery. These matters have been addressed above.

Summary tables

211. Overall, GLA officers consider that the proposed development causes the following harms to designated heritage assets (in all cases the assessment is based on the cumulative scenario).

212. The scale for extents of harm used is very low, low, low to middle, middle, middle to high, high and very high.

Designated heritage asset	Category of harm	Extent of harm	Shown in view
Springfield Hospital Registered Park and Garden, Grade II	Less than substantial	Low	BHTVIA Views 1, 2, 3, 5, 6, 7, 9, 10, 11 and 12; TVIA Addendum Views 1, 6, 9 and 10
Springfield Hospital (Main Building), listed Grade II	Less than substantial	Low	BHTVIA Views 1, 2, 6, 9, 10 and 11; TVIA Addendum Views 1, 6, 9 and 10
Elizabeth Newton Wing, listed Grade II	Less than substantial	Low	BHTVIA View 1, 7 and 9; TVIA Addendum Views 1 and 9
Gatton Primary School, listed Grade II	No harm	No harm	No view provided
Icehouse at Springfield Farm, listed Grade II	No harm	No harm	No view provided
Lodge to St Clement Danes Almshouses, listed Grade II	No harm	No harm	TVIA Addendum Vu City Model Shot 1 page 14, Shot 2 page 15 and Shot 3 page 16
Magdalen Park Conservation Area;	No harm	No harm	BHTVIA View 8

213. Overall, GLA officers consider that the proposed development causes the following harms to non-designated heritage assets (in all cases the assessment is based on the cumulative scenario).

214. The scale for extents of harm used is low, middle and high.

Non-designated heritage asset	Extent of harm	TVIA view
Streatham Cemetery	Low	BHTVIA Views 3, 4, 5 and 12;TVIA Addendum Views 14a and 14b
The former Chapel of Springfield Hospital	No harm	No view provided
Garratt Green	No harm	No view provided

Conservation conclusions

215. The heritage harms and heritage benefits are as discussed above.

216. The proposed development is contrary to Wandsworth Local Plan Objective 4 and Policy LP3 and the Historic Environment SPG because harm is caused to heritage assets.

217. In light of the less than substantial harm identified above, the proposed development is contrary to Policy HC1 Part C of the London Plan: This harm and policy conflict is taken into account in the overall planning balance.

National Planning Policy Framework assessment

Archaeology

218. The submitted Archaeological Desk-Based Assessment concludes (Paras 5.7 to 5.11): “Development on the study site will not impact on any designated archaeological assets. The site is not located within an Archaeological Priority Area, as defined by the London Borough of Wandsworth. Based on current evidence, this assessment has identified a low archaeological potential for all past periods of human activity. Past post-depositional activity, particularly associated with the development of Springfield Hospital, can be considered to have had a substantial negative impact on any archaeological remains on the study site. Therefore, in view of the study site’s limited theoretical archaeological potential, combined with past post-depositional impacts, development within the site is considered unlikely to have a negative archaeological impact. It is considered that the proposed cemetery boundary works are also unlikely to have an archaeological impact.”

219. Historic England’s Greater London Archaeological Advisory Service responded to consultation on 23 January 2023, stating “Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or are available in connection with this application, it is concluded that the

proposal is unlikely to have a significant effect on heritage assets of archaeological interest. No further assessment or conditions are therefore necessary."

220. GLA officers consider that no harm to potential archaeological assets is foreseeable. No archaeological planning conditions are therefore needed. Therefore, the application satisfies the requirements of Policy HC1 of the London Plan and Policy LP3 of the Local Plan.

Surrounding amenity impacts

Daylight, sunlight, and overshadowing

221. The Council's committee report discussed sunlight and daylight impacts of the proposal on neighbouring properties in detail. The applicant submitted a daylight and sunlight report as part of the ES in line with BRE guidelines.

Daylight impacts

222. The applicant has applied two assessments to assess daylight impacts including Vertical Sky Component (VSC) which measures the amount of available daylight from the sky received to a particular window and No Sky Line (NSL) that calculates the area at a working plane level inside a room that would have a direct view of the sky.

223. In relation to VSC analysis of the 292 windows that were tested, 281 (96%) would continue to meet the BRE guidelines and therefore experience a Negligible (not significant) effect as a result of the proposed development.

224. A further 4 windows assessment would experience a 'Minor Adverse' effect (a loss of between 20 and 30%), which in an urban location such as this is not considered significant. This results in a total of 285 of 292 windows tested (98%) not experiencing a significant effect as a result of the proposed development.

225. In relation to the NSL, analysis for all rooms tested when taking account of the proposed development, 197 (100%) of the 197 rooms assessed would meet the BRE criteria and therefore experience a Negligible effect (not significant).

226. When taking account of the VSC and NSL daylight results within the submitted assessment, the following 29 existing properties (sensitive receptors) are concluded to be in an appropriate degree of accordance with the BRE Guidelines with the proposed development in place:

- 139 to 143 (odds) Hebdon Road
- 1-8 (inclusive) John Hunter Avenue (Plot V)
- 9-16 (inclusive) John Hunter Avenue (Plot V)
- 19-26 (inclusive) John Hunter Avenue (Plot U)
- Vernon House, Springfield Hospital (Plot S, Phase 6A)
- 1-101 Fitzgerald House, St Georges Grove

227. Of the remaining seven windows (2% of the total assessed) within the three sensitive receptors that would experience a greater loss of VSC, there would be a

loss of between 30%-40%. This is deemed to be a Moderate Adverse effect - significant) based on the default values in the BRE Guidance.

228. The assessment has identified that not all windows at 17 John Hunter Avenue, 18 John Hunter Avenue and Phoenix Ward (located on Plot T of the Springfield Hospital site) would not meet the BRE Guideline criteria. A moderate adverse impact to some of the windows tested has been identified, however, an acceptable level of daylight distribution would be maintained to each property. Therefore, the overall impacts on daylight amenity are not considered to be unacceptable.

Sunlight impacts

229. The applicant has tested Annual Probable Sunlight Hours (APSH) which is a mean daylight factor to assess sunlight impacts.

230. The APSH results indicate that of the 197 windows assessed, the following 29 sensitive receptors would experience sunlight effects which are considered to be Negligible (not significant) with the proposed development in place, and thus do not require further consideration in respect to sunlight:

- 139 to 143 (odds) Hebdon Road;
- 1-8 (inclusive) John Hunter Avenue;
- 9-15 (inclusive) John Hunter Avenue;
- 19-26 (inclusive) John Hunter Avenue;
- Phoenix Ward;
- Vernon House, Springfield Hospital (Plot S, phase 6A) ; and
- 1-101 Fitzgerald House, St Georges Grove.

231. The assessment has identified that not all windows at 16 John Hunter Avenue, 17 John Hunter Avenue and 18 John Hunter Avenue would meet the BRE guidelines suggested for APSH, with 83%, 91% and 69% of the windows meeting the BRE guidelines respectively. A minor to major adverse effect to some of the windows tested has been identified, however, an acceptable level of sunlight distribution would be maintained to each property. Therefore, the overall impacts on sunlight amenity are not considered to be unacceptable.

Overshadowing

232. In terms of amenity space, Sun Hours on Ground Overshadowing (SHOG) concerns testing sunlight received by amenity spaces between buildings.

233. 31 amenity areas have been considered in the daylight and sunlight report for the SHOG overshadowing assessment. The results of the analysis show that 27 (87%) of the 31 amenity spaces tested would meet the BRE guidance: either retaining at least 2 hours of sun in excess of 50% of their respective areas once the development is in place, or where already below this level in the existing condition receiving little or no reductions whatsoever thus meeting the 20% relative reduction criteria. The proposed development therefore has Negligible (not significant) impact in terms of overshadowing on amenity areas for the following tested properties:

- Nos. 1-8 (inclusive) John Hunter Avenue;

- Nos. 9-15 (inclusive) John Hunter Avenue;
- Nos. 20-26 (inclusive) John Hunter Avenue;
- Phoenix Ward (Plot T Springfield Hospital);
- Vernon House, Springfield Hospital (Plot S, Phase 6A);
- 1-101 Fitzgerald House, St Georges Grove; and
- Streatham Cemetery.

234. The assessment has identified overshadowing impacts to the amenity space of 16-19 (inclusive) John Hunter Avenue, which range between minor and major adverse impacts. The assessment found that the vast majority of the amenity space would receive 2 hours of sunlight on 21 June. Officers do not consider that the overshadowing impacts would be unacceptable.

Conclusion

235. From the above assessment it is concluded that some properties to the north would be impacted in relation to daylight, sunlight and overshadowing. In most instances, the impacts would be relatively minor with acceptable levels of light maintained to each property. Given the site allocation for a residential-led mixed-use development in the Local Plan, further impacts compared to the existing conditions are to be expected. GLA officers conclude that the proposed development would be acceptable in regards to daylight, sunlight and overshadowing and satisfies the requirements of Policy D6 of the London Plan and Policy LP2 of the Local Plan.

Wind microclimate

236. A wind microclimate assessment has been submitted with the application. This was based on wind tunnel tests for the existing site, for the proposed development in the context of existing surrounding buildings and for the proposed development with cumulative surrounding buildings and proposed landscaping included.

237. The assessment found that once operational all wind conditions in and around the site would be suitable for the intended uses. In the absence of landscaping, there would be minor wind comfort exceedances on the site. However, these will be addressed through a condition requiring the implementation of the landscaping scheme (Condition 17).

238. Overall, GLA officers are satisfied the wind impacts of the development are acceptable and satisfies the requirements of Policy D8 of the London Plan.

Privacy, sense of enclosure and outlook

239. The proposed development would result in additional opportunities for overlooking towards the rear of some properties in John Hunter Avenue. This would, however, be across minimum window-to-window distances of approximately 23 metres which is considered to be an acceptable distance in terms of maintaining privacy. There would also be opportunities for overlooking to the end of terrace properties in John Hunter Avenue. This would, however, be to secondary windows on the opposite side of the road at distances of over 10 metres. This is considered acceptable. There would also be opportunities for overlooking towards the rear of properties in Hebdon Road. This would, however, be angled views with a distance

of between 23 metres and 50 metres and therefore is considered to be acceptable. To the west of the site, the existing units in St Georges Road are up to 80 metres away and therefore do not raise concerns.

240. The proposed development would result in outlook impacts to the terraces at 1 to 8 John Hunter Avenue and 16 and 17 John Hunter Avenue. Whilst the proposed townhouses are three-storeys in height, they would be at a lower ground level than the existing terrace at 1 to 8 John Hunter Avenue, and have a window-to-window distance of up to 23 metres. This is considered acceptable to maintain a good outlook. The rear of 16 and 17 John Hunter Avenue would face onto the flank wall of the new end of townhouses at a distance of between 10.5 metres and 11.5 metres. This will reduce the outlook of these properties, but not significantly. The proposed taller blocks would have an impact on the flanks of the end of terrace properties at 17 and 18 John Hunter Avenue, however, these are secondary windows at a distance of 15 metres, and therefore, the impact is considered acceptable.

241. From the above, it is considered the proposed development is acceptable in regards to privacy, sense of enclosure and outlook and satisfies the requirements of Policy D6 of the London Plan and Policy LP2 of the Local Plan.

Noise

242. Chapter 8 of the ES states the proposed development would result in noise and vibration effects, both during the demolition and construction phases, and on completion and occupation of the development.

243. The applicant has acknowledged there will be significant disruption on residential properties and the hospital buildings during the demolition and construction programme, which will likely last 3 to 4 years. The applicant has confirmed that Springfield Park will remain operational during construction. The applicant has submitted a construction environmental management plan and construction logistics plan with mitigation measures secured by condition (Conditions 4 and 5).

244. In terms of the completed development, the noise assessment concludes that no significant effects would result from operational building services and plant noise nor from road traffic noise associated with the proposed development. The effects of the completed development at all receptors were deemed to be negligible and no mitigation measures were considered necessary.

245. Given the above assessment, it is considered the development is acceptable in regards to noise and disturbance and satisfies the requirements of Policy D14 of the London Plan and Policy LP2 of the Local Plan.

Health, arts and local employment

246. The applicant submitted a health impact assessment (HIA) which concludes that the development would not result in any negative impacts on the health of the existing or future population of the immediate or local areas.

247. The proposed 449 residential units are expected to generate a population of approximately 900 residents. The HIA identifies two GP practices nearby which

are over capacity as measured against HUDU guidelines. Given this pressure on NHS capacity, the development would generate a primary healthcare contribution of £261,788 towards the expansion of health infrastructure in accordance with the NHS HUDU Planning Contributions Model, which has been secured in the S106 agreement.

248. The Planning Obligations SPD (2020) requires developments of more than 100 residential units to submit and agree an arts and cultural action plan, or if this is not appropriate to pay a commuted sum to enable the Council to meet such requirements in the local area. The applicant submitted a cultural action plan with the application. This would deliver a variety of cultural interventions and public art installations across the site. The securing of the cultural action plan and a time framework and funding plan to deliver this is secured in the S106 agreement.

249. The Planning Obligations SPD requires that opportunities for the employment, training and support of local labour are provided throughout the construction phase of a development and for the end use of (non-residential) development. To achieve this a Local Employment and Enterprise Agreement securing an Employment and Skills Plan and Local Procurement Plan, with the target number of job, training and apprenticeship places based on the Council's Planning Obligations SPD and in consultation with Economic Development Officers would be entered into by the applicant. This is secured in the S106 agreement.

250. Subject to the recommended obligations, the proposal is considered to be acceptable in relation to health and health inequalities, art and culture, and encouraging local employment opportunities. Therefore, it satisfies the requirements of Policy GG3 of the London Plan, Policy LP15 of the Local Plan and the Planning Obligations SPD.

Sustainability and environment

Trees

251. The existing site contains 77 trees or tree groups with 27 tree groups proposed to be retained. Of the trees to be removed one is a Category A; 8 are Category B, 36 are Category C and 5 are Category U. The one Category A tree that is to be removed is a large London Plane tree covered by a TPO. The applicant has investigated its retention, but it is not possible due to the building footprints, and instead, various other high quality trees have been retained. This is accepted.

252. The proposed development includes the planting of 50 new trees to replace those lost. The trees have been identified as high quality, with the planting specification requiring UK sourced and UK grown trees. Various large canopy trees have been specified, including London Plan, Tulip, Willow, Small-leaved Lime, European Aspen and Norway Maple.

253. Since the call-in of the application, further tree planting was requested. The applicant has introduced new trees along Lapidge Way which will create an informal avenue along the path to connect the development with the adjacent parkland.

254. Overall, the landscaping proposals, tree removal and replacement, and species selection are well-considered and will provide an appropriate transition between the site and the MOL. The Council's tree officer raises no objection subject to the secured conditions. The application therefore satisfies the requirements of Policy G7 of the London Plan and Policy LP56 of the Local Plan.

Ecology and biodiversity

255. The proposal includes a variety of features which would contribute towards enhancing the biodiversity of the site. These include planting native species; plants that flower at different times of the year, including pollinator planting and colourful/scented plants; tree and shrub planting that would provide numerous habitat opportunities for bats, birds, small mammals, and invertebrates. Bat and bird boxes would be incorporated into the development, as would the use of green and brown roofs. A bio-diverse attenuation pond is also proposed.

256. The application is accompanied by a biodiversity net gain (BNG) assessment. The assessment demonstrates that as a result of the delivery of a comprehensive, diverse landscaping scheme, the biodiversity net gain on the site has been sought to be maximised. The report identifies that as a result of this, the proposed development would result in a net gain in habitat units of 2.92 (using the Defra biodiversity metric calculator 3.1) and therefore a BNG of 25%. As such the level of BNG achieved within the site will be higher than the 10% net gain requirement set out in the Environmental Act 2021 once the development has been completed.

257. Conditions have been secured, including further details of the ecological enhancements and management plans, details on external lighting to protect wildlife habitats and public safety, and to increase habitat value and biodiversity net gain (Conditions 21 and 23).

258. Overall, the ecology and biodiversity strategy are well-considered and will increase the biodiversity of the site. Therefore, the application satisfies the requirements of Paragraph 180 of the NPPF, Policy G6 of the London Plan and Policy LP55 of the Local Plan.

Urban greening

259. The landscaping strategy has been designed to ensure the provision of high-quality green spaces and permeable hard surfaces have been maximised. In addition, the landscaping strategy includes the delivery of extensive and intensive brown and green roofs; species rich grassland and new trees, hedgerows, planting beds and rain gardens.

260. The applicant has undertaken a UGF assessment which demonstrates that the scheme would achieve an UGF score of 0.41. This meets the UGF benchmark in the London Plan. A condition is secured to ensure the UGF score is a minimum (Condition 22).

261. Overall, GLA officers consider the urban greening strategy to be acceptable and therefore satisfies the requirements of Policy G5 of the London Plan and Policy LP57 of the Local Plan.

Energy

262. The applicant has submitted an energy statement with the application. The energy statement sets out that carbon emissions will be reduced by prioritising fabric and energy efficiency measures to minimise initial demand, before applying a clean heating system. Heating and hot water is to be led by electric and renewable measures, incorporating air source heat pumps to provide most of the heating demand for the development.

263. The development is to be carried out in phases, and Blocks A and B would initially connect to the existing site heating network. The existing network consists of a CHP gas boiler which would provide up to 67% of capacity with the remainder met through a communal gas boiler. However, once the proposed air source heat pumps are operational, all buildings within Phase 2B would run off the system.

264. The applicant has advised of challenges with connecting to the existing Springfield Village heat network due to it being gas-led and first requiring decarbonisation. To ensure this connection can be completed in future, a term requiring the applicant to investigate the connection in future has been secured in the S106 agreement.

265. Since the call-in of the application, the applicant has increased the PV quantity from 221kWp to 594.4kWP which is integrated with a biodiverse roof and plant areas. The applicant has demonstrated that the roof space has been maximised.

266. The energy strategy demonstrates that the scheme will achieve an overall on-site reduction in carbon dioxide emissions of 67% over Part L of the 2013 Building Regulations. This falls short of the net-zero target set out in Policy SI2 but meets the 35% minimum reduction required by this policy. A carbon offset payment of £368,967 has been secured in the S106 agreement to address the shortfall.

267. The applicant has reviewed the Be Seen energy monitoring guidance and compliance with the guidance is secured in the S106 agreement.

268. A condition is secured requiring the CO2 emission on-site reductions are to be met as a minimum and that development is in compliance with the submitted energy assessment and sustainability statement (Condition 26).

269. Given the above assessment, GLA officers consider that the proposal satisfies the objectives of Paragraph 162 of the NPPF, Policy SI2 of the London Plan and Policy LP10 of the Local Plan.

Waste management

270. A site waste management plan has been submitted with the development which sets out the proposed waste and recycling storage details for the site and how refuse would be managed. Further details on waste management arrangements have been secured by condition (Condition 31).

271. Overall, the waste storage provision and collection arrangements have been assessed as satisfactory by the Council and therefore satisfy the requirements of Policy LP1 of the Local Plan.

Whole life-cycle carbon (WLC)

272. The applicant submitted a WLC assessment and has provided all required information within the project details section of the GLA's WLC template under the Detailed planning stage tab, in line with the GLA Whole Life-Cycle Carbon Assessment guidance document.

273. A condition is secured requiring the submission of a post-construction assessment, on a phased basis, to report on the development's actual WLC emissions (Condition 30).

274. The proposal satisfies the requirements of Policy SI2 of the London Plan and Policy LP10 of the Local Plan.

Circular economy

275. The applicant has submitted a circular economy statement and has addressed all comments raised by GLA officers, including in relation to the strategic approach, key circular economy commitments, bill of materials, recycling and waste and reporting and operational waste. It is recommended that compliance with the circular economy statement is secured by condition. The submission of a post-construction monitoring is secured by condition (Condition 19).

276. Subject to compliance with the recommended conditions, the proposal satisfies the requirements of Policy SI7 and D3(d)(13) of the London Plan, and LP13 of the Local Plan.

Digital connectivity

277. A condition is secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with Policy SI6 of the London Plan. (Condition 13).

Water

Flood risk

278. The site is in Flood Zone 1 and is greater than 1 hectare in area and located within a Critical Drainage Area (CDA). The applicant has submitted a flood risk assessment (FRA) as required by the NPPF.

279. The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, groundwater, and reservoir flooding, which is considered to be low. When mitigation measures are considered, the residual sewer flood risk is low. Compliance with the flood risk assessment is secured by condition (Condition 24).

280. Therefore, the application satisfies the requirements of Paragraph 165 and 173 of the NPPF, Policy SI12 of the London Plan and Policy LP12 of the Local Plan.

Sustainable drainage

281. The applicant has submitted a drainage strategy which follows the drainage hierarchy and considers the suitability of Sustainable Drainage Systems (SuDS) and how they are implemented on the site.

282. GLA officers raised concerns with the proposed approach to discharge the two northern most catchments at an unrestricted rate, and advised the discharge should be restricted and to achieve greenfield runoff. In response, the applicant has amended the drainage strategy which shows the northernmost connection as seeing a reduction in a peak runoff rate of 74.3%. A condition is secured for a revised drainage strategy to be provided if this cannot be achieved (Condition 46).

283. Therefore, the application satisfies the requirements of Policy SI.13 of the London Plan and LP12 of the Local Plan.

Water efficiency

284. The sustainability statement includes an indicative water specification which achieves the target of achieving water use of 110 litres per person per day for unit under the optional national technical standard. However, final water specification for each unit will be updated later in the design process. As such a condition limiting water usage is also considered necessary and should be added to any consent requiring evidence of water fittings, there flow rate/volume and that these achieve 105l internal water use and 5l external use per person per day or less (Condition 28).

285. Therefore, the application satisfied the requirements of Policy SI.5 of the London Plan and Policy LP10 of the Local Plan.

Air quality

286. An air quality assessment has been submitted with the application. The assessment acknowledges that the entire borough is declared as one Air Quality Management Area (AQMA). The proposed development is expected to comply with the requirement that all new developments in London should be at least air quality neutral.

287. With regards to the demolition and construction phases of development, subject to the implementation of proposed mitigation measures, the demolition and construction phase would not result in significant effects at sensitive receptors as a result of dust emissions and on-site machinery emissions. This would be controlled through a dust management plan.

288. With regards to road traffic emissions associated with the completed development the submitted report concludes that these would have a negligible effect (not significant) on local air quality.

289. To minimise the impacts of air quality and achieve an air quality positive development, the proposed development will utilise air source heat pumps which have no associated emissions to supplement the energy supply. This in

combination with a number of measures such as the promotion of sustainable development methods would help ensure that Air Quality Positive is achieved.

290. The submitted report states that the expected car trip generation would exceed the air quality neutral benchmark. As such, mitigation measures have been proposed within the delivery and servicing plan (Condition 32).

291. Conditions requiring the submission of a dust management plan, the requirement for PM10 monitoring, and the requirements for Non-Road Mobile Machinery (NRMM) have been secured (Conditions 6 and 7).

292. Subject to compliance with the recommended conditions, it is considered the development is acceptable in regards to air quality. Therefore, it satisfies the requirements of Policy SI 1 of the London Plan and Policies LP2 and LP14 of the Local Plan.

Contamination

293. The applicant has submitted a desktop contamination assessment report which concludes that with recommended mitigation measures implemented, the contamination risk to the proposed development and / or identified receptors would be negligible. Conditions have been secured requiring the submission of an on-site investigation scheme, followed by a remediation strategy, both prior to commencement of development, and then submission of a verification report prior to first occupation (Conditions 9, 10 and 11).

294. Subject to the recommended conditions the proposal has been considered to have an acceptable in regards to contamination and therefore satisfies the requirements of Paragraph 183 of the NPPF, Policies LP2 and LP14 of the Local Plan.

Transport

National policy context

295. Chapter 9 of the NPPF sets out the Government's aim to promote the use of sustainable modes of transport. When considering the transport implications of development proposals, the NPPF states that decision-makers should ensure that opportunities available to promote sustainable transport modes have been taken up; safe and suitable access to the site would be achieved for all users; and any significant impacts from development on the transport network (in terms of capacity or congestion) or highway safety can be mitigated to an acceptable degree. Paragraph 115 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or where residual cumulative impacts on the road network would be severe. Paragraph 116 of the NPPF sets out additional criteria which should be addressed which includes pedestrian, cycle, and inclusive access.

Strategic London policy context

296. Policy T1 of the London Plan sets out a strategic approach for transport in London. This seeks to ensure the most effective land use to reflect connectivity to sustainable travel. Development proposals must demonstrate how they will deliver improvements to facilitate the Mayor's Healthy Streets Approach, by prioritising walking, cycling and public transport in accordance with Policy T2. Policy T5 requires development to remove barriers to cycling and support the delivery of a London-wide network of cycle routes. Regarding car parking, Policy T6 states that new development should be designed to provide the minimum necessary parking ('car-lite') except for disabled persons parking in line with Policy T6.5. Other relevant transport policies are Policies T3, T4, and T7 which cover transport demand and mitigating development impacts to the transport network, deliveries, servicing and construction. Policy T9 of the London Plan sets out the Mayor's priorities for planning obligations which may include contributions towards public transport and cycle network or making improvements in line with the Healthy Streets Approach.

297. The Mayor's Transport Strategy (2018) (MTS) seeks to promote sustainable mode shift, reduce road congestion, improve air quality, and assist in the development of attractive, healthy and active places. The MTS aims to ensure that by 2041, 90% of all Inner Londoners' trips will be made on foot, by cycle, or by public transport.

Local policy context

298. Policies LP50 and LP51 of the Local Plan state what information should accompany an application in order to assess the relevant transport implications and advises that development will be permitted where it does not have an unacceptable impact on the transport system, including public transport capacity and the highway network.

Transport context

299. The outcome of the Committee was a resolution to refuse planning permission. Transport was included a reason for refusal and a number of objections were raised on transport matters. The transport reason for refusal is as follows:

'The proposed development, due to the number of residential units proposed and the application site's isolated location with poor public transport accessibility, would generate a large number of trips including from servicing and deliveries, placing unreasonable pressure on the constrained surrounding transport network and to the detriment of both existing residents in the locality and future residents of the proposed development, contrary to policies LP50 and LP51 of the Wandsworth Local Plan (adopted July 2023).'

300. The Mayor's Stage 1 comments concluded that further work on transport was required prior to determination by the Council. These matters are considered as part of the submitted amendments to the scheme as set out below.

Access

301. Vehicle access is via a single access road off Lapidge Drive. The access road runs along the northern half of the site and terminates in a turning head between

Blocks A and C enabling vehicles to manoeuvre on site and exit in a forward gear. Lapidge Drive links with Springfield Drive to the north and north west. A pedestrian refuge island is provided where the access road meets Lapidge Drive to facilitate safe pedestrian movements. The wider Springfield Hospital Masterplan site is served by Glenburnie Road and Burntwood Lane.

302. There is no longer a vehicle access proposed via John Hunter Avenue which formed part of the consented outline scheme. This ensures that there is no longer a vehicle through route within the site.

Trip Generation

303. The applicant has summarised their updated trip generation assessments within the Transport Position Statement (TPS) dated July 2024 and Transport Response (TR) dated August 2024, which has been undertaken in accordance with TfL's methodology. This concludes that the development is likely to generate an additional 253 two-way person movements during the weekday morning peak (0800 to 0900), and approximately 194 two-way movements during the evening peak (1700 to 1800). Of these, it is predicted that there will be 36 two-way vehicle trips in the AM peak hour and 28 in the PM peak hour. The majority of additional movements are predicted to be public transport trips (113 two-way trips in the AM peak hour and 86 in the PM peak hour), walking and cycling trips (85 two-way in the AM peak hour and 66 in the PM peak hour) and motorcycle (10 two-way in the AM peak hour and 8 in the PM peak hour). This is consistent with a restraint-based approach to car parking.

304. This is considered to be a robust assessment as it does not discount any existing trips and assumes all trips are new to the network.

Car parking

305. Parking provision is closely linked to use, and car use generates a host of negative impacts which need to be managed and addressed, including congestion, noise, poor air quality, climate change, severance, and road danger. Parking restraint and management is therefore essential in ensuring sustainable development and underpins mode shift.

306. A total of 48 car parking spaces are proposed on site, equating to a car parking ratio of 0.11 spaces per unit. All car parking is located on-street along the internal access road. Parking is in accordance with London Plan standards and represents a reduction of 69 spaces from the consented outline scheme for this part of the site.

307. Disabled persons parking will also be provided in accordance with the London Plan, which requires provision for 3% of dwellings at the onset. 29 of the remaining spaces are safeguarded for future conversion should demand arise. Monitoring undertaken as part of the Car Parking Management Plan (CPMP), will ensure that the additional disabled persons car parking spaces will be provided should demand arise, and has been secured by condition (Condition 36). All car parking spaces will include active electric charging facilities which is also secured by condition (Condition 35).

308. The development site is not located within an existing Controlled Parking Zone CPZ. However, car parking on the wider masterplan site is controlled via the mechanisms set out within an overarching CPMP. Each phase of development also has its own CPMP. A permit system will ensure that only authorised persons and vehicles are able to park on site and the wider site. A site management company will be responsible for monitoring and enforcement. Furthermore, there is an existing legal restriction to ensure that residents of the wider Springfield Hospital site are excluded from any future CPZ such that residents are unable to obtain permits to park in the roads surrounding the site, and this is secured in the S106 agreement.

309. The overall parking provision for the development is considered to be appropriate given the site's urban location and access to public transport.

310. The car parking provision accords with Policy T6 and T6.1 of the London Plan and Policy LP 51 of the Local Plan.

Healthy Streets and Vision Zero

311. The Healthy Streets approach aims to create a high quality, attractive and inclusive environment in which people choose to walk, cycle, and use public transport. The dominance of vehicles should be reduced by using design to ensure slower speeds and safer driver behaviour, in line with the Mayor's Vision Zero ambition. The proposed development will generate an increase in pedestrian and cycle trips to / from the site and the local area.

312. In addition to the new vehicular access route, a variety of pedestrian and cycle routes are proposed as part of the redevelopment proposals for the site. A new linear promenade running through the centre of the site would provide the primary pedestrian/cycle route. The promenade will link with John Hunter's Avenue to the north and Streatham Cemetery to the south. This will be a shared footway / cycleway measuring 3.75 metres in width and will also act as an emergency access for the development. A footway is proposed to spur off the southern part of the promenade to the west and will connect with the wider masterplan site and Springfield Park. Footways will also be provided along the internal access road.

313. The pedestrian link via Streatham Cemetery to the south, provides improved permeability for residents by providing a more direct route to the south towards Tooting Broadway Underground Station and the many amenities located nearby, although it is noted that the cemetery link would be restricted to daylight hours only to align with the opening hours of the cemetery. The development is considered acceptable even if the pedestrian link via Streatham Cemetery were not to come forward in the future.

314. Vehicle access will not be provided via John Hunter Avenue which reduces the dominance of cars on the new vehicle access route and allows more space between the residential buildings for pedestrian and cycle use. To prevent the misuse of the pedestrian and cycle only access routes, the details of physical and management measures to prevent vehicles (other than emergency service vehicles) from being able to use John Hunter Avenue and the central pedestrian/cycle promenade, is secured by condition (Condition 37).

315. For cyclists, the new internal routes through the site will provide access to the existing cycle network beyond the site. Cycleway 7 is located along the A24 Upper Tooting Road providing a route between Colliers Wood in the south and Cannon Street in Central London. There are also a number of local cycle network routes providing access to the wider cycle network. It is noted that a highway contribution secured for the consented outline scheme is proposed to be used to deliver a pedestrian and cycle safety scheme on Burntwood Lane. Furthermore, a consultation on a new Quietway route from Earlsfield Station to Springfield Hospital is currently underway.

316. A number of pedestrian and cycle benefits were introduced as part of the consented outline scheme. These include footways on all internal access roads including Lapidge Drive. There are numerous routes through the wider site, providing connectivity to Tooting, Earlsfield and Wandsworth as well as internal links to Springfield Park. New local amenities will be provided as part of the wider Springfield Masterplan. New local amenities are provided as part of the wider Springfield Masterplan. These will include a gym, café and restaurant and are within walking distance off Springfield Drive to the north of the site. A local food store is also proposed to open before the end of the year.

317. Overall, it is considered that the layout of the development provides improvements for pedestrians and cyclists. These improvements will contribute to the Mayor's Healthy Streets agenda for encouraging active travel and mode shift away from the private vehicle. Therefore, GLA officers consider that the application would comply with Policies T2 and T4 of the London Plan.

<u>Cycle parking</u>

318. The applicant is proposing a total of 817 long-stay cycle parking spaces on site, and a further 32 short-stay spaces, which is slightly above London Plan minimum standards. Long-stay parking is provided in number of secure stores located adjacent to residential lobbies or within the garden areas of the proposed townhouses. Short-stay parking will be located within the public realm close to building entrances. 20% of cycle parking will be provided as Sheffield stands at the conventional spacing of 1.2 metres, a further 5% of the parking be accessible Sheffield stands spaced more widely (1.8m between stands) to accommodate larger cycles, the remaining 75% of spaces will be two-tier stands. A condition requiring cycle parking details has been secured (Condition 33).

319. The Council have highlighted that whilst the cycle parking provision accords with the London Plan cycle parking standards, given the limited car parking and public transport accessibility, a greater level of cycle parking would be supported. Cycle parking is already provided slightly above London Plan minimum standards and cycle parking demand would be monitored through the Travel Plan and further cycle parking will be provided should demand arise.

<u>Public transport</u>

Buses

320. There is currently only 1 bus route (G1) within an acceptable walk distance (640 metres) of the site. This service which currently stops on Burntwood Lane will be reintroduced back into the site, via Springfield Drive, in September 2024. A further 4 bus routes are located just beyond 640m of the site: 155, 219, 355 and 690, although it is noted the 960 is a school service. Bus route 315 will also be extended into the site once changes have been made to the Glenburnie/Trinity Road junction to facilitate bus movements. In order to facilitate the proposed extension two new bus stops are required to be located near the Glenburnie Road entrance on Springfield Drive. A bus infrastructure obligation is secured in the S106 agreement.

321. The proposed development is predicted to generate a total of 27 two-way bus trips in the AM peak and 21 two-way bus trips in the PM peak hour. However, given the distance to the closest rail and underground stations it is assumed that a proportion (50%) of these trips would also use the bus services to access the stations. TfL have accessed the uplift in demand based on current capacity and conclude that no additional buses would be required to accommodate the predicted level of demand generated by the development.

322. A bus service contribution of £1,514,999 was secured for the extant outline planning application, to enhance bus services for the masterplan site. The first instalment of this contribution will be used for the extension of bus route 315.

London Underground

323. Tooting Bec London Underground (LU) station is located just beyond 960m of the site and is therefore not included in the PTAL calculation. The station is located approximately 1.1 kilometres from the site, therefore it is not considered that walking or cycling a further 140 metres would be a significant deterrent to many future residents. Tooting Bec LU station is served by the Northern Line and during the peak hours is served by 30 trains towards Central London. The development is expected to generate 71 two-way LU trips in the AM peak hour and 54 in the PM peak hour. Assuming all new passengers will be travelling to Central London this would equate to an additional 3 passengers per train in the AM peak hour, which is not expected to create any capacity issues. This is a robust assessment as not all of these trips will be travelling to Central London.

Rail

324. Earlsfield and Wandsworth Common Rail stations are both located approximately 2 kilometres from the site to the west and north east respectively. Earlsfield Rail Station and the trains which serve it are operated by South Western Railway (SWR). During the peak hours a total of 11 trains per hour towards central London. Wandsworth Common Rail Station and the trains which serve it are operated by Southern Railway. During the peak hours a total of 8 trains per hour towards central London. The development is expected to generate 15 two-way rail trips in the AM peak hour and 11 in the PM peak hour. Given the frequency of services at these stations the small uplift in rail trips is not expected to create any capacity issues.

PTAL

325. Based on TfL's Webcat toolkit the application site currently has a public transport access level (PTAL) of 0-2, on a scale of 0 to 6b where 6b is the highest. With the reintroduction of the G1 bus route back into the masterplan site and the extension of the 315 bus route the public transport access level (PTAL) of the application site will increase to 3, on a scale of 0 to 6b where 6b is the highest

Highways impact

326. The development is expected to generate 47 two-way vehicle trips in the AM peak hour and 33 during the PM peak hour, including delivery and serving trips. Unlike the original assessment the revised assessment removed vehicle trips associated with the existing use on site to achieve a more robust assessment.

327. In order to determine the impact that the proposed vehicle trip generation would have on the local highway network the increase in traffic on Burntwood Lane, Trinity Road and Upper Tooting Road has been considered. Existing daily traffic data for Burntwood Lane was taken from the London Atmospheric Emissions Inventory, whereas daily data was taken from Department for Transport counts for the other two roads. For robustness all development traffic has been assigned to each road, whereas in reality these trips would disperse over all three roads. The results indicate only marginal increases in flows of 2.2%, 1.5% and 3.9% in the AM peak hour and 1.7%, 1.2% and 2.6% in the PM peak hour for Burntwood Lane, Trinity Road and Upper Tooting Road respectively.

328. The analysis indicates that the uplift in vehicle trips will have a negligible impact on the surrounding highway network. This is considered to be a highly robust assessment as there is no discount for existing trips generated by the site, which would also be included in the flow data. Furthermore, these trips would disperse onto all three road.

329. However, should vehicle demand generated by the development not meet the predicted mode share monitored through the Travel Plan, a Sustainable Transport Fund secured by obligation would allow the potential implementation of measures to ensure sustainable transport options are a viable alternative to the private car. This is discussed in more detail in the Travel Plan section.

Travel Planning & Monitor and Manage

330. A draft Residential Travel Plan has been submitted and will be used as the basis for full Travel Plan to be prepared for the development prior to occupation and is secured in the S106 agreement.

331. In order to further encourage active travel and to ensure that the development achieves the strategic mode share targets (90% for walking, cycling and public transport) required for inner London, a monitor and manage approach is proposed during the phased buildout of the development. Each phase of development will be monitored against key indicators and targets which will be agreed by the applicant, Wandsworth Council and TfL. This will include predicted mode share as identified in the Travel Plan. If the monitoring highlights that key indicators and targets are not as forecast, this can be managed through the implementation of measures / actions to address this at each phase of development. A Sustainable Travel Implementation Fund is secured up to a capped value of £350,000 in the

S106 agreement. This will allow for the implementation of measures, which could include but are not limited to the following:

- Increase the frequency of the 315 bus route, subject to demand. This would make bus use more attractive and increase bus mode share.
- Cycle infrastructure review and implementation. This could include physical infrastructure as well as softer measures such as training.
- Pedestrian infrastructure review and implementation.

Delivery, servicing and construction

332. A Framework Delivery and Servicing Management Plan (DSMP) has been submitted in support of the application and will form the basis of the detailed DSMP, which is secured by condition (Condition 32).

333. The Since the original planning application submission, the service vehicle trip generation has been revised. The development is now predicted to generate 150 two-way daily delivery and servicing vehicle trips. Based on an arrival and departure profile taken from the TRICS database, this equates to 11 two-way service vehicle trips are within the AM peak hour and 5 in the PM peak hour. The busiest hour for servicing is 14:00-15:00 with 21 two-way trips. Two inset 15m long loading bays are provided on site. As highlighted in TfL's Kerbside Loading Guidance document, deliveries to residential properties are typically made by Light Goods Vehicles (LGVs), such as vans, and that dwell times are approximately 14 minutes. The typical length of an LGV is 3.98 metres-6.84 metres. Based on this, each bay should be able to accommodate up to 2 vehicles at a time and up to 8 vehicles per hour (16 vehicles combined). Therefore, based on the predicted peak hour service vehicle trip generation (11 vehicles) the two on-site loading bays would be able to accommodate the predicted peak service vehicle demand.

334. Since the original application, it is now proposed to relocate the proposed loading bay to the north of Block A to the north of Block B. This will reduce the longest carry distance for delivery drivers on site from 142 metres to 120 metres and will ensure all units are adequately served. The location of the loading bay to the north of Block C will remain unchanged.

335. The updated deliveries and servicing arrangements are now acceptable and in accordance with Policy T7 of the London Plan and Policy LP 51 of the Local Plan. The detailed DSMP is secured by condition. It should detail how delivery and servicing movements will be controlled, managed, and adhered to by all occupiers.

336. Policy T7 of the London Plan promotes the provision of Construction Logistics Plans (CLP) and membership of the TfL Fleet Operators Recognition Scheme (FORS), to minimise the impact and safety risks of construction activities on people and the transport network. The Construction Management Plan (CMP) has been secured by condition (Condition 4). Careful consideration of constructions routes and access will be required as part of the detailed plan to minimise disruption. Where possible construction traffic will avoid peak hours.

Conclusion on transport

337. The layout of the development provides new public realm and will allow permeability and connectively through the site for pedestrians and cyclists encouraging sustainable travel. The proposed residential car parking is considered acceptable in this urban location, and includes transport improvements to ensure sustainable modes are highly attractive. The proposal would not result in any highway or pedestrian safety concerns subject to conditions and the completion of a S106 agreement.

338. Subject to a suitable framework of controls and mitigation as identified above being secured through a S106 agreement and use of appropriate planning conditions, the transport impacts of this development are in accordance with strategic and local transport policies in the Policies T1, T2, T4, T5, T6, T6.1, T7 of the London Plan and Policies LP 50 and LP 51 of the Local Plan.

Mitigating the impact of the development through planning obligations

339. Regulation 122 of the Community Infrastructure Levy Regulations 2010 as amended in 2019 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.

340. 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.”

341. Wandsworth’s Planning Obligations SPD (2020) provides further guidance on how the Council will secure planning obligations, where these are necessary to mitigate the impacts of development.

342. Pursuant to the consideration within the previous sections of this report, and in line with the policy context set out above, GLA officers propose to secure several planning obligations required to appropriately mitigate the impact of this development, which are set out in full at paragraph 3 of this report. GLA officers are confident that the obligations in the Section 106 agreement meet the tests in Regulation 122 of the CIL Regulations 2010 as amended in 2019 as they either will not be spent on “infrastructure” as defined in the regulations or will be sufficiently narrowly described in the section 106 agreement. A full list of the obligations is provided under paragraphs 3 above, and where appropriate there is detailed consideration given in the relevant topic section of the report.

Legal considerations

343. Under the arrangements set out in Article 7 of the Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor, acting

under delegated authority, is the Local Planning Authority (LPA) for the purposes of determining this planning application ref:

344. Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 which includes a requirement that for applications the Mayor takes over, the Mayor must give the applicant and the borough the opportunity to make oral representations at a hearing. He is also required to publish a document setting out.

- who else may make oral representations;
- the procedures to be followed at the hearing; and,
- arrangements for identifying information, which must be agreed by persons making representations.

345. The details of the above are set out in the Mayor's Procedure for Representation Hearings which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.

346. In carrying out his duties in relation to the determination of this application, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.

347. Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:

a) The provisions of the development plan, so far as material to the application;

b) Any local finance considerations, so far as material to the application; and

c) Any other material consideration.

348. Section 70(4) defines "local finance consideration" as:

a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or

b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

349. Furthermore, in determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.

350. Other guidance, which has been formally adopted by Wandsworth Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations of some weight (where relevant). Those that are relevant to this application are detailed in this Representation Hearing report.

351. GLA officers are satisfied that the current report to the Deputy Mayor has had regard to the relevant provision of the Development Plan. The proposed section 106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.

352. As regards to the Community Infrastructure Levy (CIL) considerations, Mayoral CIL payments and Wandsworth CIL payments are expected to be made in association with this development.

353. In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess. The Mayor is also required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development (section 72 of the of the Planning [Listed Buildings and Conservation Areas] Act 1990). These matters have been addressed within earlier sections of the report.

354. Where the Mayor takes over an application, he becomes responsible for the section 106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to discuss the section 106 content, and it has progressed on a number of key issues. Both the Mayor and the borough are given powers to enforce planning obligations.

355. When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and decided in accordance with the development plan unless material considerations indicate otherwise.

356. The key Articles to be aware of include the following:

- Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

- Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.

- Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.

357. It should be noted, however, that most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this

Representation Hearing report sets out how this application accords with the Development Plan.

358. Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.

359. The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

360. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

361. GLA officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of accessible housing, and the protection of neighbouring residential amenity, as well as matters addressed in the Equalities section of this report, above.

Conclusion and planning balance

362. As detailed above Section 38(6) of the Planning and Compensation Act 2004 requires matters to be determined in accordance with the development plan unless material considerations indicate otherwise.

363. When assessing the planning application, the Deputy Mayor is required to give full consideration to the provisions of the development plan and all other material considerations. He is also required to consider the likely significant environmental effects of the development and be satisfied that the importance of the predicted effects and the scope for reducing them, are perfectly understood.

364. GLA officers consider that the proposal complies with most relevant planning policies at national, regional and local level, and whilst there are some adverse impacts resulting from the scheme and associated aspects of policy conflict, including on heritage, nevertheless, GLA officers consider that the proposal is in overall conformity with the development plan.

Public benefits and planning balance and NPPF balance

365. As detailed in the Heritage section of this report and summarised in paragraphs 215-217, above, the proposed development would result in less than substantial harm to the significance to a number of heritage assets surrounding the site (at the low end of the scale) in terms of Paragraph 208 of the NPPF. Great weight must be given to that harm. It would also result in some harm to a non-designated heritage asset which must be taken into account pursuant to Paragraph 209 of the NPPF.

366. The proposals would provide the following public benefits, which weigh in favour of the scheme.

Housing delivery Strategically significant housing delivery of London-wide important, delivering up to 449 residential units. Out of the 449 residential units, there would be 167 one-bedroom units, 225 two-bedroom units and 57 three-bedroom units.	Significant weight
Affordable housing delivery 50% on-site affordable housing provision with a tenure mix of 50% Social Rent and 50% London Shared Ownership.	Significant weight
Construction benefits The 4-year construction programme will provide employment opportunities. A Local Employment and Enterprise Agreement securing Employment and Skills Plan and Local Procurement Plan, with the target number of job, training and apprenticeship places is secured. An Employment and Enterprise Contribution is secured.	Limited to moderate weight
Public realm and landscaping, open space improvements, and trees and biodiversity Creation of 2.7 acres of open space within Springfield Park, and landscaping, public realm, and public routes through the site. Biodiversity Net Gain of 25% and Urban Greening Factor of 0.41	Moderate weight
Sustainability	Moderate weight

Carbon reduction on site	
Other transport related benefits Improved connectivity through the site for pedestrians, cyclists and vehicles Sustainable transport fund and bus infrastructure contributions secured.	Limited weight

367. Considerable and individual weight and importance must be attached to the harm caused by the proposals to surrounding heritage assets in any balancing exercise. Considering the extent of the harm that would be caused, which would be 'less than substantial' at the low end of the scale, and the public benefits outlined above, it is concluded that the public benefits delivered by the scheme would clearly and convincingly outweigh the heritage harm.

368. The balancing exercise under paragraphs 208 and 209 of the NPPF is therefore favourable to the proposals and the proposal would be acceptable in terms of impact on heritage assets.

Overall planning balance and Conclusion

369. As noted above, the proposed development does not fully comply with the development plan Policy HC1 of the London Plan and Policy LP3 of the Local Plan relating to heritage.

370. The package of public benefits would also be significant in terms of the development plans strategic aims. Subject to conditions, the proposed development also meets all other relevant development plan policies, including Policies D3, D4, D5, D6, D7, D8, D12, D13, D14, H1, H4, H5, H6, H10, S4, G1, G3, G4, G5, G6, G7, S1, SI 1, SI 2, SI 3, SI 4, SI 5, SI 6, SI 12, SI 13, T1, T2, T4, T5, T6, T7 and DF1 of the London Plan and LP1, LP2, LP10, LP11, LP12, LP13, LP14, LP19, LP23, LP24, LP27, LP50, LP51, LP53, LP54, LP55, LP56, LP57 and LP52 of the Local Plan.

371. This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable.

372. Accordingly, it is GLA officers' recommendation that planning permission should be granted for planning application reference 2022/5288, subject to the obligations set out under the S106 legal agreement and conditions set out in the draft Decision Notice attached at Appendix 1.

For further information, contact GLA Planning Unit (Development Management Team):
Zeb McInnes, Senior Strategic Planner (case officer)
email: zeb.mcinnes@london.gov.uk
Neil Smith, Senior Projects Officer
email: neil.smith@london.gov.uk
Allison Flight, Deputy Head of Development Management
email: alison.flight@london.gov.uk
John Finlayson, Head of Development Management
email: john.finlayson@london.gov.uk
Lucinda Turner, Assistant Director of Planning
email: lucinda.turner@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.