

PD10532/PB/ARS/NJ
email: anna.russell-smith@montagu-evans.co.ukPlanning Policy
Wandsworth Council
The Town Hall
Wandsworth High Street
London
SW18 2PU

15 March 2023

Sent via email to:
planningpolicy@wandsworth.gov.uk

Dear Sir/Madam

**LONDON BOROUGH OF WANDSWORTH: LOCAL PLAN
CONSULTATION ON PROPOSED MAIN MODIFICATIONS TO THE PLAN
TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)**

We write on behalf of our client, South West London and St Georges Mental Health NHS Trust (SWLSTG), in response to the London Borough of Wandsworth's emerging Local Plan consultation on the Proposed Main Modifications. These representations follow comments previously submitted by the Trust and attendance to the Local Plan hearing sessions in relation to the following draft policies:

- Emerging Policy LP4
- Emerging Policy: OUT 3
- Emerging Policy: LP17
- Emerging Policy: LP53

For the purpose of this response, we have not set the background and context of the Springfield Hospital site. Please refer to previous representations for this information.

Comments on Main Modifications:*Emerging Policy OUT 3 and LP4*

Throughout the Local Plan process the Trust have supported the Springfield Hospital site allocation (policy OUT 3) however have raised concern with part of the emerging policy and its reflection on what is being delivered on across the wider Site.

Draft allocation OUT 3 (Springfield Hospital, Burntwood Lane/Glenburnie Road, SW17) identifies the Site for new and improved hospital facilities, residential and small scale commercial / retail uses serving the hospital, residential and school facilities. The draft allocation also requires the retention of the open space for use as a public park with recreational use and the retention of the locally listed chapel for community facilities.

The Main Modifications lists that the following amendments to draft allocation OUT 3:

- MM140 – measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.
- MM141 – The size of urban blocks should reflect the urban grain and character of the areas ~~small urban blocks should be used~~ to create a distinctive neighbourhood that promotes permeability and legible connections to the wider area.

Main Modifications MM140 and MM141 are supported by the Trust.

However, there is still objection to the inclusion of the following wording within the allocation:

13.19 Building Heights – in accordance with the tall and mid-rise building maps in appendix 2, the site is not located in a tall or mid rise building zone. Development proposals for tall or mid rise buildings will not be supported.

Whilst previous representations have been made with regards to the comprehensive redevelopment of the Springfield Hospital Site and should be afforded due consideration as part of this examination, these representations primarily focus on the building's height constraints set out in the allocation to enable the Springfield Hospital site to optimise the delivery of units across the site and contribute to the Local Plans overall housing requirement.

As discussed at the Hearing the Springfield Hospital site is a strategic site which has delivered a new mental health hospital, alongside housing (including affordable housing) and community infrastructure including a circa 32 acre new publicly accessible park.

In addition to Site Allocation OUT 3 we attended on behalf of the Trust, the hearing session relevant to the Council's proposed mid-rise buildings policy (policy LP4) together with a number of developer representatives whose clients are the owners of very substantial sites across the borough that are capable of delivering a significant quantum of new housing and employment floorspace in line with the draft plans broader aspiration.

The evidence presented at the Hearing requested the Council gave further consideration to emerging policy LP4 and alternative wording was proposed which provides the necessary flexibility to ensure that the character and appearance of the Springfield Hospital site and the development that has been approved and / or is pending determination is reflected within the site allocation.

Following the hearing the Trust and a number of developers took the Inspectors' suggestion seriously and collectively spent time liaising with each other to try to find a form of words which maintained the Council's cautious approach to the potential for townscape impacts from taller buildings whilst giving sufficient acknowledgment that these considerations are not the full extent of the Plan's proposed operation in relation to tall and mid rise building consideration.

The joint group of developers present at the hearing session submitted proposed amendments with the hope that officers would give this careful consideration as an option that would address the Inspectors identified concern and ensure that a positive approach to plan making could be demonstrated. It however appears this has been dismissed by the Council and the following amendment proposed.

Local Plan Policy LP4 submission version stated at part G that:

“proposals for mid-rise buildings will not be permitted outside of identified tall and mid-rise building zones”.

Following the hearing and the Inspectors request that the Council review their proposed wording the Council's main modifications suggests the following amendment:

“Part G – the Council will seek to restrict proposal for mid rise buildings ~~will not be permitted~~ outside the identified tall and mid rise buildings zones”.

Albeit it is acknowledged that the Council have revisited the policy wording, it is not considered that the policy creates enough flexibility to ensure that sites across the Borough are optimised.

As discussed at the hearing the Springfield site falls within Character Area F2 (Tooting Residential) within the Urban Design Study 2021, which forms part of the Council's evidence base. The study states that 'Tooting residential is characterised by period terraced streets surrounding Tooting Centre...' However, the study does not set out within the key characteristics section the current and evolving character of the Springfield Hospital Site.

The Springfield Hospital Site is subject to a wider masterplan plan which includes large hospital, a school, care home, houses, flatted blocks, mansion blocks, the conversion of the Grade II listed main building and a circa 32 acre public park on the site. The parameter plans attached to the outline planning permission approved buildings of between 3m and 15m across the site. As mentioned at the Hearing the masterplan is well progressed with a number of the parcels having been delivered, including the delivery of the new hospital. However, the scale and grain of development across Springfield Hospital is not considered in the Urban Study.

It is also noted that adjacent land to the Springfield Hospital Site at St George's Grove is residential accommodation within blocks of between 5/6 storeys.

Notwithstanding the current planning status across the Springfield site as set out in previous representations placing such a restriction prohibiting development to only four storeys does not comply with draft Policy SDSI, which under part C sets out that new homes will be delivered by 'making the best use of land whilst ensuring that development densities are appropriate to the location and size of the site in accordance with Policy LP1' nor does it reflect the topography of site. In line with draft policy LP1 the location of buildings should 'optimise the potential of sites so that the layout and arrangement of buildings to ensure a high level of physical integration with their surroundings and consideration of broader placemaking'.

In addition paragraph 14.33 of the emerging Local Plan sets out that opportunities for mid-rise buildings and notes that these should be generally concentrated within five different area types. This includes areas 'alongside large-scale open spaces', which in the case of Site Allocation OUT 3 (Springfield Hospital), does not appear to have been taken into consideration. In addition, contrary to draft policy LP1 nor has contributing factors of the existing / changing contexts of sites or the topology of the land (i.e. on site with significant drops)..

Springfield Hospital includes a proposed area of open space (new public park) equating to approximately 32 acres and has significant level drops between 16m AOD and 24m AOD. In addition, as set out above, the masterplan includes large scale hospital buildings of 15m and is in the context of the adjacent site which consists of 5-6 storey residential accommodation. Therefore, in line with the LPA's own criteria for allocating mid-rise areas, it is considered that the Springfield Hospital Site should be allocated within a mid-rise area, where in line with draft policy LP1 it is demonstrated

that the design led approach is making the best use of land whilst ensuring that development densities are appropriate to the location of the size of the site.

It is fully acknowledged that there are number of heritage assets within the Springfield Hospital Site including the Main Building and Elizabeth Newton wing, which are Grade II listed and part of the site is designated as a Grade II Registered Park and Garden.

In addition to the wider masterplan there is a planning application currently pending on the site which proposes, in part, 5 storey residential development. The acceptability of the location for this midrise development was careful considered throughout the pre application process and robustly justified through technical assessments. A Heritage and Townscape Visual Impact Assessment (HTVIA) has been submitted as part of the application. The application seeks to demonstrate the clear heritage benefits of the proposal, over that approved under the Springfield Hospital masterplan.

The restrictive nature of the mid-rise policy (including within OUT 3) places undue constraints on the Site's redevelopment, which could in turn hinder the funds generated from surplus land being reinvested into the Trust's EMP. Not only therefore would the restriction of building heights in this location to four storeys be contrary to the design led approach at both national and regional policy it may also hinder the Trust's ability to bring forward the wider EMP. Adopting a design-led approach to schemes, where buildings heights and their associated impact in the context of their surroundings and broader placemaking would be tested as part any forthcoming planning application, would ensure developments are brought forward which complement the Site's context whilst enabling funds to be generated to support the delivery of wider social infrastructure.

It is considered that the current policy as drafted does not constitute positive planning nor do the zones appear to have been substantiated against testing, capacity and delivery or clearly linked to the relevant environmental, social and economic objectives of the Local Plan (Chapter 2).

In order for the Borough to be able to diversify and respond to the borough's needs over the next plan period there is a need for at least a requirement for the provision of 'unless robustly justified'. Through the adoption of a criteria such of that used within Policy D9 (Tall Buildings) within the London Plan would allow developments outside of the identified tall building or mid-rise zones to bring forward taller development where it has been demonstrated through robust justification that they are of the highest design quality, do not give rise to unacceptable impacts and would be design-led in light of the Site's context.

In summary, it is not considered that the mid rise policy included within draft Site allocation OUT and policy LP 4 is justified against national or London Plan policy, local context or other policies within the draft policy. It is therefore considered, to ensure the soundness of the Local Plan, that the mid rise policy should be amended as requested in previous representations to ensure that a positive approach to plan making is demonstrated.

We are very happy to discuss this further with officers and seek to find revised policy wording.

Emerging Policy LP17

As acknowledged within the previous representations, part of the Springfield Hospital site continues to be designated as Metropolitan Open Land (MOL). Draft Policy LP53 (Protection and Enhancement of Green and Blue Infrastructure) of the emerging Local Plan states that areas identified as MOL will be protected, enhanced and made more accessible.

Any alterations to the boundary of the MOL should be considered during the Local Plan process and should be fully evidenced and justified in consideration of the purpose of including the land within the MOL as set out above. As raised within previous representations on behalf of the Trust, the wider Springfield Site benefits from outline planning permission which approved the comprehensive redevelopment of Springfield Hospital. The redevelopment of the Site includes the provision of residential accommodation and a 32 acre publicly accessible park within the MOL.

Concerns are raised that the emerging Local Plan fails to revise the MOL designation to reflect the development which has to date been permitted within the MOL under permission 2010/3703 (as amended) (namely parcels P, Q, part of G, X, Y and Z). It is also noted that there is a currently pending application with the LPA, which includes the reorientation of the MOL in part, to improve its overall purpose.

In line with Policy G3 (Metropolitan Open Land) of the London Plan the current Local Plan review process provides an appropriate opportunity to refine the MOL boundary on the Site to account for the development parcels approved. It should be noted that the revision of the MOL Boundary would only be in relation to the development plots and the quantum of the proposed park and open space would remain subject to such designation. The MOL boundary should therefore be revised, in consultation with key stakeholders of the Site, to reflect the permitted / pending development of parcels P, Q, part of G, X, Y and Z.

Other Observations:

The Trust is supportive of the following Main Modifications:

MM179 (emerging policy LP 17):

that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of a service transformation plan ~~any strategic restructuring of health or emergency services demonstrated through an overarching or estates strategy where investment is needed in modern, fit for purpose infrastructure and facilities~~ ~~or similar needs based assessment~~

MM177 (emerging policy LP17)

in accordance with a service transformation plan or estate strategy relocation or consolidation ~~provision~~ of public services maybe acceptable across the borough

Closing

We trust that the above comments in relation to the Main Modifications are useful. We wish to maintain an active role in the emerging Local Plan process and request to participate, on behalf of the Trust, therefore please do keep us informed of the progress of the Local Plan.

If you have any comment / queries please do not hesitate to contact Anna Russell-Smith (anna.russell-smith@montagu-evans.co.uk / 0207312 7498) or Nadine James (nadine.james@montagu-evans.co.uk / 020 7866 8683) of this office in this first instance.

Yours sincerely



Montagu Evans LLP