PLANNING STATEMENT

The demolition of two redundant buildings (Thistle and Shamrock) to be replaced with a sensory garden.



On behalf of The Oxleas NHS Trust

Lee Evans Planning Ref: 9240

December 2023

Full Planning Application

At

Thistle and Shamrock, Goldie Leigh Campus, Lodge Hill, Abbey Wood, SE2 0AY

Client	Oxleas NHS trust
Determining Authority	Greenwich Borough Council
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I. INTRODUCTION

- I.I Lee Evans Partnership LLP has been commissioned by Oxleas NHS Foundation
 - Trust to prepare and submit an application for 'full' planning permission in relation to the demolition of two redundant buildings within the Conservation Area, to be replaced with a Sensory Garden.
- 1.2 This Planning Statement outlines the site context, planning policy considerations and the merits of the proposal. It assesses the proposed development against the development plan for the Borough, with due regard to relevant material considerations including the National Planning Policy Framework (NPPF) and planning history.
- 1.3 The application comprises the following documents:
 - The relevant application forms
 - This planning Statement
 - Design & Access Statement
 - Site Location and Existing/Proposed Block Plans
 - Preliminary Ecological Assessment
 - Bat Survey Report
 - Heritage Statement
 - Building Survey
 - Landscape Masterplan

- Section 2 provides details of the application site
- **Section 3** of this Statement describes the planning history
- Section 4 provides a description of the proposed development
- Section 5 considers the planning policy framework and identifies the relevant national and local planning policy considerations and guidance in relation to the development.
- Section 6 provides and assessment of the proposal
- **Section 7** concludes our views on the acceptability in planning terms of the proposal.
- 1.4 This statement concludes that the proposed development would satisfy the relevant planning policies for the City, and aligns with the guidance of the framework.
- 1.5 It is respectfully requested that planning permission be granted.

2. APPLICATION SITE

Site Description

- 2.1. Goldie Leigh Hospital is located on Lodge Hill in Abbey Wood. To the South West of the site is Plumstead Cemetery and to the North east is a Recreation Ground. The main entrance to the site is just North of the entrance to Langley Road.
- 2.2. The hospital opened in 1902 as a children's hospital and was eventually changed to Goldie Leigh Hospital in 1933. The site currently features a mixture of residential units and outpatient facilities.



Figure I - Site Location

- 2.3. The Goldie Leigh Hospital features a row of six similar cottages along Lodge Hill. To the front, the cottages are fronted by a low brick boundary wall and iron railings which from part of the significant landmark.
- 2.4. The Goldie Leigh Hospital site has been subject to a regeneration by Oxleas NHS Foundation Trust over many years. As a result, the hospital is able to provide various services within its grounds including physiotherapy, occupational therapy and inpatient services for a wide range of people with learning difficulties and mental health problems.
- 2.5. The application site comprises of two of the buildings on the Goldie Leigh campus, known as 'Thistle and Shamrock'. The buildings are of an Edwardian style architecture, however, for many years they have been vacant and have fallen to disrepair. A building survey has highlighted that the buildings are in poor repair, have suffered from fire damage and are now unsafe to enter. The buildings have been boarded to prevent entry, but there is an ongoing concern around their structural integrity (especially the timber elements)

Planning Policy Designations

- 2.6. The site is located within the designated Goldie Leigh Hospital Conservation Area and the Metropolitan Open Land.
- 2.7. For completeness, it is acknowledged that the site does not contain nor does it sit within the setting of any listed heritage assets.

- 2.8. It is acknowledged that the Site itself is designated as a protected heritage asset, as identified under Addendum mull of the Royal Greenwich Local Plan: Core Strategy with Detailed Policies.
- 2.9. The application site is also located within the Metropolitan Open Land and falls within an Area of Special Character.
- 2.10. The application site is not otherwise subject to further planning designations.

3. PLANNING HISTORY

3.1. The Goldie Leigh Hospital has a significant history with regards to planning applications but there is no planning history that is directly relevant to the two buildings that are the subject of this application.

4. THE PROPOSED DEVELOPMENT

Background and need for the Development

- 4.1. Following the Goldie Leigh Hospital regeneration in 2008, the hospital found itself with excess buildings that were initially intended to be either sold or redeveloped. Unfortunately, the Trust could not find a suitable buyer and no longer had a purpose for them, this in turn resulted in their deterioration and being vandalised.
- 4.2. The proposed development can be described as the removal of two redundant buildings (Thistle and Shamrock), to be replaced with a sensory garden.
- 4.3. Goldie Leigh Hospital currently provides accommodation for individuals with diverse needs, including both long-term residents and temporary day visitors, many of whom have complex and challenging requirements. For example, Somerset Villa offers temporary housing to survivors of domestic violence, while Barefoot lodge is a mixed gender inpatient rehabilitation unit for people with significant mental health problems. The Tilt hostel also provides accommodation for patients moving into the community from secure psychiatric services. In addition children's physical outpatient services are located on site with hydrotherapy and physical activity being provided.
- 4.4. As a result, the sensory garden would offer the vital space necessary to cater to the diverse needs of Goldie Leigh Hospital's users. It would serve as a place for patients, staff, and visitors,

offering opportunities for social interaction, peaceful contemplation, sensory stimulation and play.

Layout, appearance and Scale

- 4.5. The Sensory garden would utilise the existing footprint of the two redundant buildings (Thistle and Shamrock) to create two distinct areas. One would be an enclosed space for children's play and the opposite side of the garden would primarily be used a space for people to relax, socialise or contemplate.
- 4.6. Both areas of the garden would be linked by a sensory path which would involve different materials being used over the different surfaces of the path such as, plastic tubing or rounded pebbles.
- 4.7. Interactive elements such as accessible swings and timber stepping logs which encourage children of all abilities to play and challenge their balance.



Figure 2- Extract of the Proposed Layout Plan showing the new Sensory Garden

Access and Parking

- 4.8. Currently, off street parking is provided, and the proposed sensory garden will not change this arrangement.
- 4.9. The Sensory garden is within close proximity to regular bus services, railway stations and the site is easily accessible by foot.

Biodiversity and Landscaping

4.10. The proposed development aims to incorporate a diverse range of plants designed to engage all the senses. These plants will contribute to the goals of the sensory garden by offering a variety of colours, textures, and scents.

4.11. The planting would be diverse and low maintenance. It would include amenity grasses and a wildflower meadow. In turn, this creates an environment for wildlife to live and thrive in this area.

5. PLANNING POLICY

- 5.1. Decisions on planning applications must be made in accordance with the policies of the development plan unless material considerations indicate otherwise. Here, the development plan for the purposes of \$38(6) of the Planning and Compulsory Purchase Act (2004) comprises the Royal Greenwich Local Plan.
- 5.2. There are a number of other material planning policy considerations relevant to determination of this proposal, including the National Planning Policy Framework (NPPF), local planning policy documents, The London Plan and The Listed Building Act 1990.
- 5.3. It is considered that the following local and national policy considerations will be most relevant to the determination of this application.

Royal Greenwich Local Plan (2014)

- 5.4. **Policy OS1** promotes access to existing public and private open space, including Metropolitan Open Land.
- 5.5. **POLICY DH I** is a criteria-based policy and places and emphasis on high- quality design which contributes positively to the built and natural environment. Criteria iv promotes accessible and inclusive environments for all, including disabled people.
- 5.6. **Policy DH3** notes the Royal Borough will protect and enhance heritage assets and settings of the Royal Borough including the

preservation or enhancing the character and appearance of the Conservation Areas.

5.7. **Policy DH (h)(i)** notes planning permission will only be granted for proposals which preserve or enhance the character and appearance of the Conservation Area. Part iii of this criteria notes that demolition of a building and structure that positively contributes to the character or appearance of a conservation area will be resisted.

Legislation

Planning (Listed Buildings and Conservation Areas) act
 1990

Royal Greenwich Local Plan: Core strategy with Detailed Policies:

Addendum mull-Goldie Leigh Hospital

London Plan 2021

- Policy D3- Optimising site capacity through the designapproach
- Policy D5- Inclusive Design
- Policy G3- Metropolitan Open Land
- Policy G6- Biodiversity and access to nature
- Policy HCI- Heritage conservation and growth

National Planning Policy Framework (NPPF) (2023)

- 5.8. The NPPF is a material consideration in assessment of this application. The NPPF was updated on September 2023 and revised paragraph numbers are referred as relevant.
- 5.9. **Paragraph 2** advises that the NPPF is a material consideration in planning decisions.
- 5.10. **Section 2** considers the meaning and role of sustainable development and how planning can help to achieve it. Paragraph 7 outlines the objective of sustainable development can be summarised as 'as meeting the needs of the present without compromising the ability of future generations to meet their own needs.'
- 5.11. **Paragraph 126** highlights the importance of fostering the construction of high-quality, aesthetically pleasing, and ecologically sustainable structures and environments as a central objective of the planning and development process. Paragraph 130 outlines the specific standards that development projects should meet, with a particular emphasis on.
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - **b)** are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and

- landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- 5.12. **Chapter 15** focuses on the preservation and improvement of the natural environment, aligning with development efforts that prioritise the preservation and enhancement of biodiversity. This is particularly significant when it can enhance overall benefits for biodiversity.
- 5.13. **Chapter 16** deals with Conserving and enhancing the historic environment.
- 5.14. **Paragraph 180** encourages development that primarily focuses on conserving or enhancing biodiversity especially where it enhances public access to nature.
- 5.15. Paragraph 194 In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is

proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

- 5.16. **Paragraph 195** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.17. **Paragraph 197** In determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.18. **Paragraph 199** when considering the impact of a proposed development 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). This is irrespective of whether any potential harm, total loss or less than substantial harm to its significance.

5.19. **Paragraph 202** where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable us

6. PLANNING CONSIDERATIONS

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. Having regard to the relevant policy provisions and other material considerations, we consider at this stage that the principal issues relevant to the determination of this application will be;
 - The principle of demolishing the two buildings (Thistle and Shamrock) within a Conservation Area.
 - The design of the proposal, with reference to visual impact.
 - Environment.

Principle of Development

- 6.3. Policy DH(h) iii) notes that the demolition of buildings and structures that positively contribute to the character or appearance of the Conservation Area will be resisted. In this instance, the cottages have become derelict and no longer positively contribute to the character of the area.
- 6.4. The heritage statement notes that, while the two buildings and the site have some special national and regional significance as an early model on the site, they have fallen into a state of considerable disrepair. Their

dilapidated appearance has a significant impact on the character of the conservation area, as identified in Figures 3 and 4. As a result, the proposed Sensory Garden would be an improvement on the appearance of the Conservation Area.



Figure 3- An example of the current condition of the Shamrock Building.



Figure 4- An example of the current condition of the Thistle Building.

Design Matters

- 6.5. The primary policies relating to design matters therefore relate to policies DH3, DH(h) and Dh(i) of the Local Plan.
- 6.6. As noted elsewhere, the Site is located within a Conservation Area but the buildings Thistle and Shamrock are not listed.
- 6.7. The proposed development affords a genuine opportunity to enhance the visual appearance of the Conservation Area and provide a place for patients, visitors, and staff to quietly contemplate but also a place for social activity.

- 6.8. Policy DHI deals with design, identifying that proposals will be expected to consider the following key design aspects. We have set out the criteria of the policy below, with commentary on how the proposal is compliant beneath each one:
 - i. Provide a positive relationship between the proposed and existing urban context by taking account of:
 - Established layout and spatial character; The gardens would complement the current layout by utilising the existing footprint of the two buildings.
 - Architectural historical and archaeological features and their settings; The proposed sensory gardens have been thoughtfully designed to complement the existing architectural element and preserve the existing cultural significance by utilising the existing footprints of the two buildings. The proposal would also include a plaque to recognise what the buildings were.
 - Patterns of activity, movement and circulation particularly for pedestrians and cyclists; The sensory garden provides a sensory path which involve different materials being used to surface different sections of the path, this would encourage users to travel along the path which connects the garden to the hospital.
 - ii. **Promote local distinctiveness by providing a site- specific design solution;** As mentioned above the sensory garden seeks to harmonise the redevelopment with the historical context and character of the site which will significantly contribute to the well-being of both patients and visitors.

- iii. Demonstrate that the development contributes to a safe and secure environment for users and the public; the garden would be located within the grounds of the Goldie Leigh hospital and would provide for a much-needed place for staff, patients and visitors to relax, contemplate and play.
- iv. Achieve accessible and inclusive environments for all, including disabled people; Key consideration has been taken to create a place that would be inclusive for all users. As a result, there would be pieces of play equipment which are accessible to all. It also includes for raised beds with planting which would give an extra experience to those less mobile to be close to the planting.
- v. Enhance biodiversity consistent with the Greenwich Biodiversity Action Plan; currently the site does not provide for much biodiversity however, the sensory garden would feature a mixture of plants and bat boxes would be located on the tree to the south of the site and to Barefoot Lodge.
- 6.9. Policy Dh (h)(i) notes 'planning permission will only be granted for proposals which pay special attention to preserving or enhancing the character and appearance of the Conservation Area.' Due to the buildings being in a dilapidated state and boarded up, they currently do not provide any public realm benefit to the site. It is also noted that the buildings would fall further into disrepair due to the Oxleas Trust not having any purpose for them and being unable to sell them, as they are located within hospital grounds. As a result, the sensory gardens which would be located in place of the redundant buildings, would make a positive contribution to the character of the area, improving the visual amenity of this site.

- 6.10. Policy D3 of the London Plan sets out that development must provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity. The garden would be divided into several areas designed for different purposes. It will include formal and informal play areas with a grass labyrinth and a sensory path. Planting will stimulate the senses with bright colours and different textures. In the middle area, there will be a relaxation area, including a raised bed that would encourage people to interact with it.
- 6.11. A large number of benches would also be provided, encouraging people to rest, pause, and gather. It would also allow people to interact and socialize with one another or spend time alone if they wish.

Neighbour and Amenity Impacts

6.12. Policy DH (b) refers to the protection of neighbouring properties. Due to the nature of the proposed development and the location of the application site within a Hospital, it is submitted that the proposal will not lead to any impact to the standard of residential amenity enjoyed by any neighbouring properties. The demolition of the two redundant buildings, which have fallen into a state of disrepair, may enhance the amenity of the area, enhancing the appearance of the site.

Highways and Parking

6.13. The proposal would not have an impact on Highways and or parking due to the sensory garden using existing access nor would it result in an increase in vehicle movements.

Preliminary Ecological Appraisal

6.14. An Ecological Appraisal has been completed as part of the application, and it concluded that the application site is of low ecological value and of negligible importance. However, it did note that there were bats located within the two buildings. As a result, a bat survey was completed, and we will relocate the bats by placing bat boxes in the trees and on the neighbouring building, Barefoot Lodge.

7. SUMMARY

- 7.1 The proposal would involve the demolition of two buildings located in a conservation area that have fallen into disrepair and do not currently provide any visual benefit to the Conservation Area. In their place, a sensory garden will be established, considering the historical value of the Goldie Leigh Hospital and its surroundings, while providing a space for the Goldie Leigh Hospital Community to enjoy.
- 7.2 The proposal is considered to accord with the objectives of the development plan for the Royal Borough of Greenwich.
- 7.3 On this basis it is respectfully requested that the application be approved.