

ROYAL BROMPTON HOSPITAL SUPPLEMENTARY PLANNING DOCUMENT

1.0 INTRODUCTION

- 1.1 This report is being submitted by the Royal Borough of Kensington and Chelsea as an addendum to the Sustainability Appraisal (SA) Scoping Report for the Royal Borough of Kensington and Chelsea's Local Development Framework (LDF). It is for consultation in line with the requirements of the SEA Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004. The LDF SA Scoping Report was the subject of community engagement in early 2005 and was subsequently adopted. The LDF SA Scoping Report comprises of three volumes, namely the Scoping Report (Sept 05), Baseline Characterisation Figures (Aug 05), and Context Review (Sept 05), which are all available on the Council's website¹.
- 1.2 The LDF Interim Sustainability Appraisal report was produced in November 2005 and, together with the LDF Core Strategy Issues and Options report, was the subject of community engagement during November and December 2005. However, in accordance with advice from the Government Office for London, the Council revised the Core Strategy Issues and Options report and, together with a revised Sustainability Appraisal Update Report, was re-issued for further stages of community engagement throughout 2008 and 2009. The Core Strategy was finally adopted in December 2010.
- 1.3 This Addendum report extends the LDF SA / SEA Scoping Report to include the emerging issues and options around the future development of Royal Brompton Hospital.

2.0 BACKGROUND

Legislative Background

- 2.1 In the summer of 2001, the European Union legislated for Strategic Environmental Assessment (SEA) with the adoption of Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the 'SEA Directive'). The Directive was incorporated into UK law with the Environmental Assessment of Plans and Programmes Regulations 2004 and applies to a range of UK plans and programmes whose preparation began after 21st July 2004, or whose formal adoption is not complete by 21st July 2006.
- 2.2 The SEA/SA report supports public consultations as required by Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations

¹ Available from:

<http://www.rbkc.gov.uk/planningandconservation/planningpolicy/localdevelopmentframework/sustainabilityappraisal.aspx>

2012. Furthermore, issuing the SEA/SA Report alongside the draft version of the Royal Brompton Hospital SPD will help to provide objective information for consultees, so that responses can take full account of the predicted sustainability impacts of different 'options'. It will also identify the information being fed into the decision making process and how this has informed the decisions.

2.3 The methodology for the preparation of the scoping report is structured in line with the Government's *A Practical Guide to the Strategic Environmental Directive, 2005*, which provides guidance on the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" or SEA directive, and the *Plan Making Manual*, which includes:

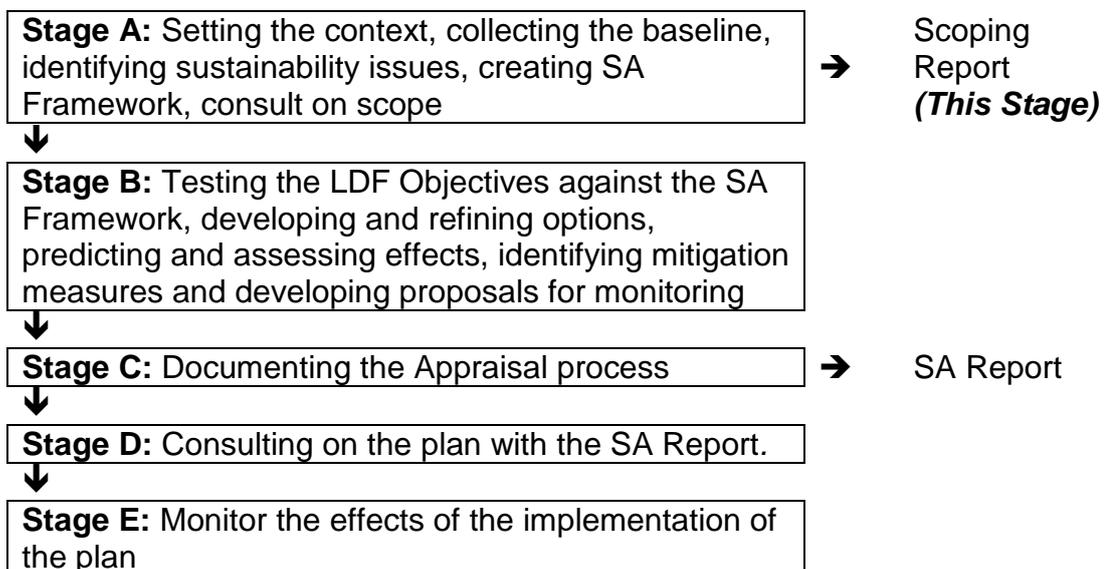
- Identifying other relevant policies, plans and programmes and sustainable development objectives
- Collecting baseline information
- Identifying sustainability issues and problems
- Developing the SA framework
- Consulting on the scope of the SA

2.4 In accordance with the *Environmental Assessment of Plans and Programmes Regulations 2004*, which converted the SEA Directive into UK legislation, the council will consult with the Environment Agency, Natural England and English Heritage, allowing them 5 weeks to comment. All feedback received will be considered and the scope of the appraisal amended if needed.

Contents of this report

2.5 Figure 1 below sets out the outputs at each stage of the SA/SEA process. This Addendum report documents the Scoping (or Stage A) of the process, setting out the context and objectives of the SA / SEA. It also establishes the baseline and decides on the scope of the SA/SEA.

Figure 1. Outputs from the SA process



- 2.6 **Please note:** This scoping report will be used to prepare the SA for the Royal Brompton Hospital SPD, which will be made available for consultation alongside the draft SPD.
- 2.7 Stage A of Figure 1, as set out in subsequent sections of this report, is divided into the following 5 key tasks:
- A1 – Context;
 - A2 – Baseline;
 - A3 – Sustainability issues;
 - A4 – SA Framework; and
 - A5 – Consult on scope.
- 2.8 This report seeks to supplement the LDF SA Scoping Report which was adopted by the Council in November 2005.
- 2.9 The main body of this report is divided into sections which document Stage A of the SEA process and, in particular, tasks A1 to A5.

3.0 Royal Brompton: Background and Overview

- 3.1 The Royal Brompton Hospital's holdings are primarily located between the Kings Road and Fulham Road, which form two major east-west axes in the heart of Chelsea. The Royal Brompton Hospital developed over more than 100 years and now occupies several different buildings adjacent to Fulham Road. This is not operationally satisfactory for the hospital as seriously ill patients have to be transferred between buildings for treatment by wheelchair, trolley or ambulance. In addition some of the hospital buildings no longer meet the requirements of a modern hospital. They date from a time when long hospital stays were normal requiring extensive inpatient wards. Now many more of the hospital's services are delivered through outpatient clinics and the number of overnight stays has been significantly reduced. As a result, if the hospital is to retain its status as one of the world's preeminent medical centres for lung and heart treatment it needs to consolidate and modernise its facilities.
- 3.2 The hospital had considered relocating out of the Royal Borough but has decided to stay and consolidate its activities into one hospital campus on Sydney Street. Retaining the hospital is of considerable social and community value to the Borough, London and the UK's position as a world leader and their decision to stay is welcomed.
- 3.3 Retaining the specialist heart and lung treatments provided by the Royal Brompton Hospital within the Royal Borough will require changes at The Royal Brompton and Harefield NHS Foundation Trust's (RBHT) sites in Chelsea. The purpose of this SPD is to establish how the Royal Brompton's campus can be consolidated and what kind of place this part of Chelsea will become in the future, prior to the submission of any planning applications.

When it is adopted, the SPD will provide more detailed design and planning guidance for the future development of RBHT's sites in Chelsea.

The purpose of the SPD is to:

- Plan positively for the area
- Promote high quality sustainable development.
- Establish guidance on the application of policies within the London Plan and the Council's Core Strategy that will be used to assess any future planning applications for the Royal Brompton Hospital Site.
- To provide greater certainty in the planning and development process and facilitate the retention of The Royal Brompton Hospital's medical uses within the Royal Borough.

3.4 The hospital's ambition to consolidate its activities is likely to result in some difficult planning decisions. In order to fund consolidation, the hospital will need to sell some buildings and redevelop other sites in its ownership. The sites currently identified for disposal are:

- **1-11 Foulis Terrace** – a terrace of townhouses in HMO (houses in multiple occupation) use, located to the north of Fulham Road
- **The Fulham Wing** – one of the hospital's ancillary wings facing onto Fulham Road
- **South Parade wing including the former Fire Station and Trafalgar Chambers and Dudmaston Mews** – a series of multifunctional hospital buildings facing onto South Parade
- **117 to 151 Sydney Street and 250 King's Road** – a small terrace of Georgian houses, a series of single storey retail units known as Chelsea Farmers' Market, and two imposing Edwardian buildings comprising offices and retail uses around a sunken courtyard.

3 STAGE A: Tasks A1-A4

Task A1 – Identifying other relevant plans, programmes and sustainability objectives

3.5 An initial review of all applicable policies, plans and strategies took place as part of the LDF scoping report ², however many of these documents were superseded with the adoption of the Coalition Government's National Planning Policy Framework in March 2012.

3.6 This section therefore outlines the documents which postdate the original scoping report, but are still considered to be of relevance with respect to producing the SPD for Royal Brompton Hospital.

² http://www.rbkc.gov.uk/pdf/rbkc_vol_1_scoping_report.pdf

National Policy
National Planning Policy Framework (adopted March 2012)
Regional Policy
The London Plan (adopted July 2011)
Local Policy
-Core Strategy for the Royal Borough with a focus on North Kensington Development Plan Document (adopted December 2010)
-Parts of the Royal Borough's Unitary Development Plan 2002 (as amended in September 2007). This has largely been replaced by the Core Strategy, but parts remain in force until the Core Strategy Review has been completed. This is scheduled to take place during 2014
-Supplementary Planning Documents, prepared by the Royal Borough

3.6.1 The Core Strategy outlines 18 'Places' within the Borough. The Council aims to protect, promote and enhance the local distinctiveness of these places and improve their character, quality and the way they function. The Southern section of the Royal Brompton Hospital site is located within the King's Road and Sloane Square 'Place'. The Council's aim is to ensure King's Road remains one of London's iconic and vibrant shopping areas by supporting proposals likely to favour independent retailers and small up market chains, supporting cultural facilities and promoting public realm, improvements (Policy CP15).

Of particular relevance to this SPD are the following Core Strategy policies:

CK1 (Social and Community Uses);
 CH 1 & CH2 (Residential);
 CF1 & CF2 (Retail);
 CF5 (Offices);
 CL3 & CL4 (Impact on heritage designations and assets).

3.6.2 Although the primary hospital building on Sydney Street is not within a conservation area, it is immediately adjacent to the Chelsea Conservation Area, which incorporates St. Luke's Church immediately opposite the Sydney Street building. Dovehouse Green is located in Cheyne Conservation Area although is not within the SPD boundary. The rest of the hospital's sites included in the SPD fall within the following designated conservation areas:

- **Royal Hospital Conservation Area** (250 King's Road, 151 Sydney St)
- **Chelsea Park Carlyle** (Dovehouse Street, South Parade, Dudmaston Mews)
- **Thurloe and Smith's Charity** (Foulis Terrace)

Full details of the conservation areas can be found in the Council's Conservation Area Proposal Statements.

Task A2 – Collecting Baseline Data

- 3.7 The SA/SEA Scoping report for the Core Strategy identified the key characteristics of the Royal Borough of Kensington and Chelsea.
- 3.8 The Issues and Options exhibition material, which set out the key characteristics and issues for Royal Brompton Hospital, and the supporting evidence base, is available on the Council’s website. The responses received to the issues and options consultation are also available on the website. Further work is being carried out on viability and this will be made available when the draft SPD goes out for consultation.
- 3.9 Taken together with section 4.3 of the original LDF Scoping Report, this addendum, the SA and the Core Strategy provide a comprehensive summary of the key social, economic and environmental issues which are identified as being of the utmost importance to the Royal Borough.

Task A3 - Main social, environmental and economic issues and problems identified

- 3.10 Section 4.3 of the original Scoping Report,³ along with the Sustainability Appraisal iterations and the Core Strategy provides a summary of the key social, environmental and economic issues that have been identified as of the most importance to the Royal Borough. The most relevant of these are listed below.

Economic
Shortage of small office, high average house prices
Environmental
Poor air quality, shortage of open space, high number of noise and vibration complaints and recycling targets
Social
Limited availability of low cost housing, shortage of doctors’ surgeries and community facilities.

Table 2: Summary of key social, environmental and economic issues identified with scoping report (2005)

- 3.11 The council has identified a number of further concerns or issues of particular relevance to the consolidation of the Royal Brompton Hospital. These include:

³ http://www.rbkc.gov.uk/pdf/rbkc_vol_I_scoping_report.pdf

- The impact upon the historic built environment of the Royal Borough of Kensington and Chelsea;
- Ensuring that new development is of a high quality;
- Retention of Community/Medical facilities;
- Provision of functional/appropriate open space.

Task A4 - Sustainability Appraisal Framework

3.12 The 16 SA Objectives from the LDF SA/SEA Scoping Report are set out in Table 3.

Table 3: Sustainability Appraisal Framework: SA objectives

SA objectives
1. To conserve and enhance the natural environment and biodiversity
2. To reduce crime and anti-social behaviour and the fear of crime
3. To support a diverse and vibrant local economy to foster sustainable economic growth
4. To encourage social inclusion (<i>including access</i>), equity, the promotion of equality and a respect for diversity
5. To minimise effects on climate change through reduction in emissions, energy efficiency and use of renewables and adopt measures to adapt to climate change
6. To reduce the risk of flooding to current and future residents
7. To improve air quality in the Royal Borough
8. To protect and enhance the Royal Borough's parks and open spaces
9. To reduce pollution of air, water and land
9a. To prioritise development on previously developed land
10. To promote traffic reduction and encourage more sustainable alternative forms of transport to reduce energy consumption and emissions from vehicular traffic
11. To reduce the amount of waste produced and maximise the amount of waste that is recycled
12. To ensure that social and community uses and facilities which serve a local need are enhanced, protected, and to encourage the provision of new community facilities

13. To aim that the housing needs of the Royal Borough's residents are met
14. To encourage energy efficiency through building design; maximise the re-use of building's and the recycling of building materials
15. To ensure the provision of accessible health care for all Borough residents
16. To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of cultural heritage

- 3.13 It is not proposed to add any further Objectives or Sub-objectives to the existing SA Framework. Of particular relevance are objectives 4, 8, 9a, 12, 13, 15 and 16, which are considered appropriate in terms of assessing the implications of the Royal Brompton Hospital SPD. Of less relevance are objectives 2, 3, 5, 7, 9 and 14. However it is likely that elements of the options will have a relationship with these objectives.
- 3.14 It is considered that objectives 1, 6 or 11 hold little or no relevant for this piece of work.
- 3.15 The different options for the development of the area will be appraised against these SA objectives. Changes may be made to the list of objectives arising from the consultation on this Scoping Report addendum.

Data gaps and availability of evidence

- 3.16 No data gaps have been identified.

Future trends

- 3.17 Predicting the nature of future trends is difficult. Doing so is dependent on multiple factors, including the global, European and national climate, and decisions which are taken at regional, national and European level. However, the Core Strategy has set a target to plan for 600 new homes per year, together with a minimum 60,000 sq m of office floorspace through to 2028. Moreover, demand for new commercial and residential floorspace is expected to remain high across both the Royal Borough and Greater London as a whole. Consequently, in this context, it is considered to be appropriate to continue to plan for the Borough's future social and community and healthcare needs, and to achieve the Core Strategy's vision (CV1) that the Royal Marsden and Brompton hospitals will continue to further their international reputation for delivering world class **health care**, education and research activities. It is important to note that mitigation measures will be recommended in the SEA/SA, if required, which could address any potential negative impacts of a future SPD.

4 CONSULTATION

Task A5: Consultation on the Scope of the SA/SEA

- 4.1 In accordance with the regulations implementing the SEA Directive, the Council has a statutory duty to consult the three statutory SEA Consultation Bodies, namely English Heritage, Natural England and the Environment Agency, on the scope of the assessment contained in this Addendum Scoping Report. In accordance with these regulations, the period of consultation is 5 weeks, from 11 February to 18 March 2014
- 4.2 This report focuses primarily on tasks A1 – A4 and when commenting on this report, respondents are asked to consider four key questions:
- Are the policies/plans/programmes/strategies/initiatives that have been highlighted as being of relevance to a future Royal Brompton Hospital SPD appropriate?
 - Do you know of any further baseline indicators that might provide useful information? If so, please provide the information or a source for the data.
 - Are the sustainability issues identified for RBKC the correct ones?
 - Do the SA objectives identified as being most relevant encompass all the necessary issues?
 - Do you have any further comments on the options provided thus far?

5 NEXT STEPS

- 5.1 Following consultation on this addendum scoping report, the Council will carry out a sustainability appraisal which involves assessing the various options put forward against the Borough's relevant SA objectives.
- 5.2 In addition, the Stage B assessment will include:
- Testing the SPD objectives against the SA Framework;
 - Developing and refining options;
 - Predicting and assessing effects;
 - Identification of mitigation measures; and
 - Developing monitoring proposals
- 5.3 The draft SPD will be put out for public consultation in accordance with the adopted Statement of Community Involvement. The Council is required to notify stakeholders when the Council is likely to consult, which will be for eight weeks from 25 February 2014 to 8 April 2014. The Sustainability Appraisal (SA) of the draft policy will be published alongside the policy document. These documents will be available on the Council's website.

Further Information

Further information on the development of the SPD and the accompanying SA process can be obtained from:

Neighbourhood Planning
Royal Borough of Kensington and Chelsea
The Town Hall
Hornton Street
London W8 7NX
email: neighbourhood.planning@rbkc.gov.uk