

# COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

13 December, 2023  
06  
23/2262

## SITE INFORMATION

RECEIVED	4 July, 2023
WARD	Northwick Park
PLANNING AREA	Brent Connects Wembley
LOCATION	Northwick Park Hospital, Watford Road, Harrow, HA1 3UJ
PROPOSAL	Relocation of a hospital ward, incorporating the construction of a rooftop extension to the existing Accident and Emergency Department to create the new ward with staircase links and level access covered walkway to the hospital tower building and associated infrastructure (Use Class C2)
PLAN NO'S	Refer to condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><b><u>When viewing this on an Electronic Device</u></b></p> <p>Please click on the link below to view <b>ALL</b> document associated to case <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_165470">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_165470</a></p> <p><b><u>When viewing this as an Hard Copy</u></b> _</p> <p><b>Please use the following steps</b></p> <ol style="list-style-type: none"><li>1. Please go to <a href="https://pa.brent.gov.uk">pa.brent.gov.uk</a></li><li>2. Select Planning and conduct a search tying "23/2262" (i.e. Case Reference) into the search Box</li><li>3. Click on "View Documents" tab</li></ol>

## RECOMMENDATIONS

That the Committee resolve to GRANT planning permission subject to:

(i) The prior completion of a legal agreement to secure the following planning obligations:

1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance
2. Notification of material start 28 days prior to commencement
3. 'Be seen' energy performance monitoring and reporting Commitment to 'Be Seen' monitoring and net zero carbon with financial contribution towards carbon offsetting with the initial payment calculated to be £62,700 and the final contribution calculated following the submission and approval of the detailed design stage energy strategy;
4. Indexation of contributions in line with inflation
5. Any other planning obligation(s) considered necessary by Committee and the Head of Planning

(ii) That the Head of Planning is delegated authority to negotiate the legal agreement indicated above.

(iii) That the Head of Planning is delegated authority to issue the planning permission and impose conditions and Informatives to secure the following matters:

### Conditions

#### *Compliance*

1. Time period
2. Approved plans
3. Non Road Mobile Machinery
4. Air Quality

#### *Post-commencement*

5. External Materials

#### *Pre-use*

6. Landscaping/Urban Greening Factor
7. Photovoltaic Panels
8. Plant Noise

#### *Post-completion*

9. Breeam Certification

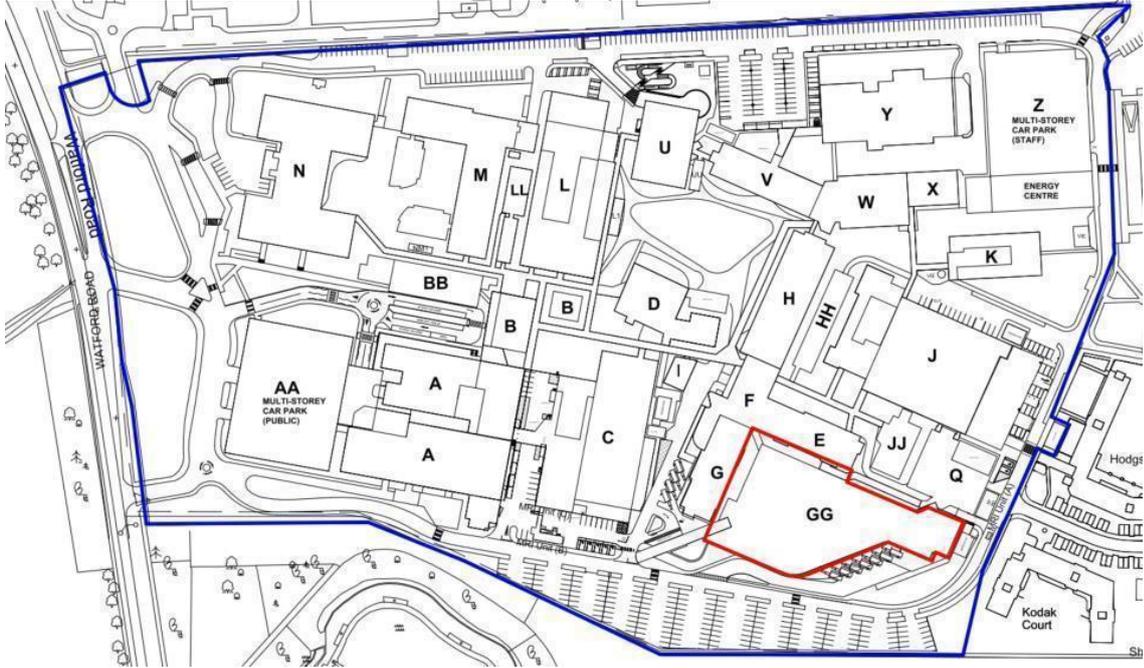
#### Informatives

As listed in decision notice

That the Head of Planning is delegated authority to make changes to the wording of the committee's decision (such as to delete, vary or add conditions, Informatives, planning obligations or reasons for the decision) prior to the decision being actioned, provided that the Head of Planning is satisfied that any such changes could not reasonably be regarded as deviating from the overall principle of the decision reached by the committee nor that such change(s) could reasonably have led to a different decision having been reached by the committee.

**SITE MAP**

 **Brent** **Planning Committee Map**  
Site address: Northwick Park Hospital, Watford Road, Harrow, HA1 3UJ  
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This map is indicative only.

## PROPOSAL IN DETAIL

Full planning permission is sought for the construction of a rooftop extension to the existing Accident and Emergency Department to create a new 32-bed ward with staircase links and level access covered walkway to level five of the hospital tower building and associated infrastructure (Use Class C2).

The Lister building (block K) previously accommodated a 38-bed ward, which was considered unfit for purpose and has had to be removed from the hospital accommodation schedule. The planning application seeks to relocate 32-beds of the lost 38-beds to the rooftop A&E Department location.

The proposed extension will cover approximately 1,536 sqm of roof space and it will have a GIA of approximately 1,426 sqm. From the existing rooftop level (c.8.6 m in height), the extension will rise 5.9 m in height to the top of a flat roof, with a parapet 0.25 m in height enclosing the roof. A centrally position AHU unit within a GRP enclosure, will rise approximately 3.2 m above the rooftop.

The corridor that will link the new ward to level 05 of the tower building would be centrally position on the rear (north) elevation and would connect at a point on the inside elbow of the tower building. 'Mattress evacuation' staircase links will also be incorporated at each end of the ward, providing stepped access to half landings on existing fire escape staircases in the adjacent hospital ward building.

Proposed materials will match that employed on the A&E Department building below.

### Amendments since submission

The following amendments have been made since the original submission:

- The Sustainability Statement was updated to better demonstrate the sustainability measures to be employed.

## EXISTING

The site comprises of the rooftop of the existing A&E Department. To the north and west, is blocks E, F, G which form an L-shape tower block.

The nearest residential properties are located in Kodak Court, a 4-storey residential block approximately 78m to the east on land previously owned by the hospital. The land to the east is subject to an outline application for its redevelopment that would include residential buildings. There is a resolution to grant consent under reference 20/0700.

To the south and separated by the hospital ring road, is a public car park, with the Capital Ring (public walking route) and golf course beyond.

The site is not located within a conservation area and does not comprise of any locally or statutorily listed buildings.

## SUMMARY OF KEY ISSUES

The key planning issues are set out below. Officers have made their recommendation after balancing all of the planning issues and objectives.

- Principle:** The proposal involves the upward extension of the Accident & Emergency Department (A&E Department) building to provide a single storey extension for a replacement ward. The principle of development is accepted as this accords with adopted policies that seek to support proposals to improve health services.
- Design/Scale/Bulk:** The overall design, scale and bulk of the proposed development is considered

acceptable and appropriate for its location. The proposed materials are considered acceptable and would complement the materials palette of the existing hospital building it will sit atop.

- c. **Air Quality:** The A&E Department is not located within an Air Quality Management Area (AQMA), however the area of the hospital west of the tower is within the AQMA. Due to the nature of the scheme, the potential for harmful emissions is considered to be low. In addition, the development is considered to be Air Quality Neutral.
- d. **Neighbour Impact:** The nearest residential building (Kodak Court) is sited approximately 80m to the east. Having regard to distancing levels, the development should not unduly impact on the amenity of the neighbouring occupiers.
- e. **Highway Impact:** There is a PTAL rating across the hospital campus ranging from 3 to 5, with the A&E Department having a PTAL rating of 3 to 4 with the hospital well located for access to the underground and bus routes. The development is a replacement ward therefore shouldn't generate additional traffic. Notwithstanding this, a significant amount of parking is available at the hospital including the recently completed construction of a multi-storey carpark with in excess of 600 parking spaces for staff. Visitor parking is provided within existing carparks.
- f. **Flooding:** The proposal does not increase the amount of impermeable surfacing and will therefore not increase the potential for flooding.

## RELEVANT SITE HISTORY

There is an extensive planning history associated with the Hospital. Below some of the more relevant:

Planning permission (**ref: 12/1615**) was **granted** on 15/05/2014 for the demolition of the existing single storey building and the erection of a part 1, part 2 and part 3 storey building in order to provide a new accident and emergency Department on land adjacent to blocks G and E of Northwick Park Hospital. Proposal includes a partial realignment of the existing site access road the creation of new access roads, new ambulance and public drop off areas, pedestrian ramps and footpaths, plant room, new retaining walls and landscaping, and subject to a Deed of Agreement dated 13th May 2014 under Section 106 of the Town and Country Planning Act 1990, as amended.

Planning permission (**ref: 14/4508**) was **granted** on 25/02/2015 for the erection of part a 4 to 5 storey building constructed over an existing substation and car parking located near Block J, providing ward accommodation on first, second and third floors along with an IDAR Unit, plant area, with ancillary cafe on the ground floor, a linked bridge to Block E, reconfiguration of parking area and associated landscaping, subject to a Deed of Agreement dated 25 February 2015 under Section 106 of the Town and Country Planning Act 1990, as amended.

Planning permission (**ref: 19/4272**) was **granted** on 20/05/2020 for the erection of a multi-storey car park (697spaces) on 5 levels for staff only, a separate plant/energy facility and associated works to access road at Northwick Park Hospital.

Planning permission (**ref: 20/0677**) was **granted** on 05/12 2020 for junction improvement works to the A404 (Watford Road), and the widening of the existing Northwick Park Hospital spine road to allow two-way traffic; pedestrian and cycle improvements and associated landscaping and public realm works, and associated changes to access, and subject to a Deed of Agreement dated 4 December 2020 under Section 106 of the Town and Country Planning Act 1990, as amended.

Outline planning permission with all matters reserved except for the means of access (**ref: 20/0700**) was **granted** on 26/02/2020 for the demolition of existing buildings on site and provision of up to 1,600 homes and up to 51,749sqm (GIA) of new land use floorspace within a series of buildings, with the maximum quantum as follows:

- (Use Class C3) Residential: up to 1,600 homes;
- Up to 50,150m<sup>2</sup> floor space (GIA) of new student facilities including Student Accommodation, Teaching facilities, Sports facilities, and ancillary retail and commercial (Use Class A1, A2, A3)

- Up to 412sqm floorspace (GIA) of a replacement nursery (Use Class D1)
- Up to 1187sqm (GIA) of flexible new retail space (Use Class A1, A2, A3)

Together with energy centre, hard and soft landscaping, open space and associated highways improvements and infrastructure works.

This application is referred to as the 'Masterplan' application.

Planning permission (**ref: 20/0701**) was **granted** on 16/03/2023 for the demolition of existing buildings and structures on the site, all site preparation works for a residential led mixed-use development comprising new homes, associated car and cycle spaces, a replacement nursery, commercial space, associated highways improvements, open space, hard and soft landscaping and public realm works subject to a deed of agreement under Section 106 of the Town and Country Planning Act dated the 16th of March 2023.

Planning permission (**ref: 22/4062**) was **granted** on 26/01/2023 for the erection of a single storey extension at level 4, with a gross internal floor area of 139sqm, internal remodelling of existing chemotherapy unit.

## CONSULTATIONS

### Public Consultation

The application was advertised through site notices and press notice. No comments were received.

### Statutory / Non-statutory Consultees

Consultee	Comments	Officer Response
Environmental Health	<p>It has been advised that the Noise Air Quality Assessment concludes that there will not be any impact on local air quality and the development is air quality neutral. No conditions are required in relation to air quality.</p> <p>A condition is recommended to ensure that any noise arising from plant should be 10dB below existing background noise levels (42dB) and Kodak Court.</p> <p>Although no piling is required, a condition should be imposed to ensure that all non-road mobile machinery shall comply with the adopted emission standards.</p>	Conditions are proposed as recommended.
Local Lead Flood Authority	It has been advised that there are no concerns with the proposal because the extended roofspace will not have a significant affect to the pluvial risk.	
Thames Water	No objections raised with regard to waster water network and sewage treatment works infrastructure capacity.	

London Borough of Harrow	No objections are raised.	Noted
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## POLICY CONSIDERATIONS

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.

The development plan is comprised of the London Plan (2021) and the Brent Local Plan (2022). Key policies include:

### The London Plan 2021

GG1:	Building strong and inclusive communities
GG2:	Making the best use of land
GG3:	Creating a healthy city
GG6:	Increasing efficiency and resilience
D3:	Optimising site capacity through the design-led approach
D4:	Delivering good design
D5:	Inclusive design
D12:	Fire safety
D14:	Noise
S1:	Developing London's social infrastructure
S2:	Health and social care facilities
G1:	Green infrastructure
G3:	Metropolitan Green Belt
G5:	Urban greening
S11:	Improving air quality
S12:	Minimising greenhouse gas emissions
S13:	Energy infrastructure
S14:	Managing heat risk
S15:	Water infrastructure
S17:	Reducing waste and supporting the circular economy
S112:	Flood risk management
S113:	Sustainable drainage
T1:	Strategic approach to transport
T4:	Assessing and mitigating transport impacts
T5:	Cycling
T6:	Car parking
T6.5:	Non-residential disabled persons parking
T7:	Deliveries, servicing and construction

### Brent's Local Plan 2019-2041

DMP1	Development management general policy
BP4	North west
BNWGA1A	Northwick Park Growth Area
BD1	Leading the way in good urban design
BSI1	Social infrastructure and community facilities
BGI1	Blue and green infrastructure in Brent
BSUI1	Creating a resilient and efficient Brent
BSUI2	Air quality
BSUI3	Managing flood risk
BSUI4	On-site water management and surface water attenuation
BT1	Sustainable travel choice
BT2	Parking and car free development
BT3	Freight and servicing, provision and protection of freight facilities

Other Relevant Policy Considerations include \_

## DETAILED CONSIDERATIONS

### Land Use

#### Making effective use of land

1. Chapter 11 of the NPPF promotes the effective use of land and para. 119 states:

*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.*

2. This is carried forward in various policies in the London Plan. Policy GG2 (Making the best use of land) seeks to enable development of brownfield land, among other areas, prioritise sites which are well connected by public transport, and explore the potential to intensify its use to support additional homes, workspaces, and higher densities.
3. Policy D3 (Optimising site capacity through the design-led approach) of the London Plan seeks to optimise site capacity by ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.

#### Land use principles

4. As an existing healthcare facility, Policy S2B of the London Plan confirms the support for development proposals that provide high quality new and enhanced facilities. The hospital has benefited from recent applications and developments to improve facilities and the current scheme replaces a ward that is no longer fit for purpose. The replacement ward will deliver a modern ward that will support the A&E Department, to the benefit of patients, staff, and the wider community which accords with adopted policies.

### Design Considerations

5. There is clear guidance on the approach to the matter of design. The NPPF (section 12) confirms that the Government attaches great importance to the design of the built environment, with good design being a key aspect of sustainable development. Poor design, which doesn't improve the character and quality of the area and the way it functions should be refused but where the design of a development accords with clear expectations in plan policies, we are advised at paragraph 130 that design should not be used as a valid reason for objection.
6. Policies in Chapter 3 of the London Plan apply to the design and layout of development and set out a range of urban design principles relating to the quality of public realm, the provision of convenient, welcoming, and legible movement routes and the importance of designing out crime by optimising the permeability of sites.

#### Layout and Access

7. The proposed site is the rooftop of the existing A&E Department (see Figures 1 and 2 above), located within the elbow of the tower building. It will be linked to the tower building via a linking corridor to Level 05 of that building.
8. The replacement ward will maximise the floorspace available and will provide 32 bed spaces in total, arranged in 6 x 4-bed bays ranging in size from 64 sqm to 65 sqm with ensuite (8 sqm) along the

south-east and north east sections of the floor, and 8 flexi side rooms (19.5 sqm each) with ensuite (5 sqm) ranged along the northwest section of the floor. Ancillary accommodation such as staff room, kitchen, staff changing rooms, a nurse's station, clinical hub and visitor WC are located primarily along a central axis of the floor, and in the south west corners.

### Height and Massing

9. The proposed single storey extension will rise c.5.9 m in height above the existing roof level of the existing building (c.9.14 m to the top of the plant enclosure) and c.16.4 m and 19.8 m respectively, above ground level. Due to its siting, the extension will be viewed within the context of the much larger tower building and therefore not appear unduly dominant.

### Elevations and Materials

10. There is a requirement to achieve the highest quality of architectural and urban design (Policy D4 of the London Plan and BD1 of the Local Plan). Some of the existing hospital buildings are predominantly white painted rendered elevations with a strong horizontal emphasis. The proposed new ward will be of a modular construction and continues with the general typology. Walls will be a basalt-based rain screen cladding in dark plum, bright green and white to compliment the A&E Department below. The proposed aluminium windows will have a graphite grey frame.
11. It is considered that the proposal responds positively to the building's location atop the A&E Department and would, subject to appropriately worded conditions, result in a high-quality building.

### **Impact on Neighbour Amenity**

12. One of the core planning principles in the NPPF is that decisions should "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings". London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. SPD1 requires new developments to maintain a distance of 18m between directly facing habitable room windows.

### Distancing / Loss of Outlook / Overlooking / Loss of Privacy

13. The nearest residential properties are located with the 4-storey block at Kodak House, approximately 80 m east of the site. At this level of distancing, the proposed development would not be prejudicial to the existing amenities of those residential occupiers in terms of loss of outlook, overlooking and privacy. It should also be noted that Kodak House is separated from the hospital by an internal hospital road. Furthermore, the new residential buildings proposed as part of the wider masterplan would also achieve similar distances, and therefore would not be prejudiced by this proposal.

### Daylight, Sunlight and Overshadowing

14. Given the levels of distancing to residential dwellings described above, and being a single storey development, albeit atop a roof, the development will not unduly impact on those residential occupiers in terms of loss of daylight and sunlight or overshadowing. The overshadowing plots below for the Spring equinox, Summer solstice, and Autumn equinox all demonstrate that any shadows cast by the proposed development do not extend towards the nearest residential dwellings at Kodak House.

### Summary of Neighbour Impact

The proposal would not unduly impact upon the amenities of nearby existing or future residential occupiers. The level of distancing involved would ensure that there is no overlooking, loss of privacy or outlook, daylight, sunlight or overshadowing. The proposal would accord with Policy DMP1 of the Local Plan.

### **Transport**

#### Policy and Context

15. London Plan Policy T1 sets a strategic aim for all development to make the most effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling

routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. Local Plan Policy BT1 seeks to promote sustainable pattern of development in the borough, minimising the need to travel and reducing the dependence on private motor vehicles.

16. The hospital site covers an area in excess of 10 hectares and is therefore covered by PTAL (Public Transport Accessibility Level) scores ranging from 3 to 5. The A&E Department has a PTAL score of 3 and 4, categorised as 'Good' on a scale where '1b' indicates poor public transport access, to 6b with excellent levels of public transport accessibility.

It should be noted that the hospital is subject to several new developments, including a sitewide highway improvement scheme, that will improve access and parking. These applications are referenced above in 'Relevant Site History' (see refs: 19/4272, 20/0677, 20/0700, 20/0701).

#### Parking / Trip Generation

17. The Transport Statement sets out details of the numbers of existing car and cycle parking spaces, albeit without specific details. Nevertheless, the recently completed multi-storey car park (ref: 19/4272) consolidated pre-existing surface car parking into a new facility and contributed to an overall loss of car parking. The multi-storey staff car park is located towards the northern end of the hospital campus, a multi-storey public car park is located towards the western end of the hospital campus, and there are surface-level car parks available.
18. The proposed 32-bed ward replaces a 38-bed ward that that was deemed unfit for purpose. The proposal will therefore not generate additional trips to the hospital.

#### Cycle Parking

19. With regard to bicycle parking, a total of 147 cycle parking spaces, in 8 locations, are provided around the hospital.

#### Travel Plan

20. Condition 16 of planning reference 19/4272 (multi-storey staff car park together with a separate plant/energy facility) required the submission of a Site-wide Travel Plan to be submitted and approved prior to the first use of the car park. It should be noted that despite the car park being used, the Site-wide Travel Plan has not yet been submitted for approval. The applicant advises that its preparation has taken much longer than anticipated because it is needing to encapsulate wider discussions stakeholders (Westminster University and Network Homes). However, the condition requires a travel plan for the hospital and not the adjoining land. Nevertheless, it is considered that this application can be determined despite the failure to submit the Travel Plan that was required pursuant to the car park consent.
21. Notwithstanding this, a Staff Travel Plan has been submitted to provide some assurance that the measures proposed to encourage the use of more sustainable modes of transport will be reflected in the Site-wide Travel Plan. Transportation officer has suggested that the Travel Plan should also encapsulate objectives and targets for visitors. However, as this scheme seeks to replace an existing ward block, it is unlikely to attract an increase in visitors and therefore it is not considered necessary to secure such measures through a travel plan associated with this development. A hospital wide travel plan is still secured in relation to the car park consent and must still be submitted, approved and implemented.

#### **Noise**

22. Policy D14 (Noise) of the London Plan requires that noise sensitive development should be separated from major sources of noise wherever practicable. The potential impact from noise on the nearest sensitive receptor (Kodak Court).
23. The Noise Assessment confirms that the noise climate at Location A was dominated by vehicle movements within the hospital site on the perimeter road, including regular buses, with constant background noise from building services plant from the existing hospital buildings. There was also distant road traffic noise and aircraft noise at times. At Location B, the noise climate was dominated by intermittent noise from ambulances and other vehicles outside A&E Department, and vehicles passing on the perimeter road. There was also constant noise from existing hospital plant in the background. The noise climate at Location C was dominated by existing hospital plant, including from the plant in the enclosure on the roof of the A&E Department, and vehicle movements on the hospital site. Due to access

limitations, only a single noise level sample was taken on the roof of the A&E Department during the daytime. As the noise levels are dominated by building services plant, it has cautiously been assumed that the noise levels are the same during the night. The table below sets out the ambient noise levels for each monitoring site.

Location	Measured Noise Level, dB			
	Day (0700-2300)		Night (2300-0700)	
	LAeq,T	LA90,T	LAeq,T	LA90,T
A (Residential – Kodak Court)	52	46	46	42
B (Proposed Development)	54	-	55	-
C (Proposed Development)	54	-	54	-

#### Demolition and Construction Noise

24. The proposed method of construction, 'MMC' (modern methods of construction), differs from the more traditional brick and block approach through the use of alternative construction methodologies, which includes off-site factory production of walls, and floors roofs which are transported to the site for assembly. In addition, being a rooftop extension, there is no need for piling, thus already removing one source of significant noise during construction activity. Notwithstanding, noise from construction activity will only be for a defined period and other sources of construction noise can be mitigated against through, but not limited to hoardings; damping; and switching engines off of stationary vehicles.

#### External Plant Noise

25. Although the exact location and technical details of the plant is unknown, for assessment purposes, it is assumed that their location will be at the nearest point to any noise sensitive receptor (Kodak Court). It is also assumed that given the operational requirements of the proposed ward, the mechanical services plant serving the proposed development could be operational 24 hours a day, seven days a week.
26. The Noise Assessment advises that based on the measured night-time background noise level of 42 dBL A90,15 mins reported in Table 3 above, the free-field total rating level from all building services plant should be controlled to no greater than 37dBL Ar,Tr external to Kodak Court to comply with the proposed planning noise limit. However, as the EH Officer has advised, the rated noise level from the plant should be 10dB below the existing background noise level. Achieving this plant noise limit requires standard design/mitigation measures. With the proposed ward being mechanically ventilated negates the need to open windows, and through the use of standard thermal double glazing, the required internal noise level limits would be achieved. A condition is proposed to ensure that the correct noise level is achieved.

#### Noise Conclusions

27. Having regard to all of the above, it is considered that through mitigation measures and conditions proposed, the development would not result in unacceptable noise levels to occupiers of the nearest residential properties.
28. It should be noted that in relation to the above matters, there is also control through Environmental Health Legislation and planning should not duplicate any controls that are available under other legislation.

#### **Carbon Reduction / Energy**

29. The submitted Energy and Sustainability Statement outlines the approach to carbon emission savings and renewable energy. It is acknowledged that being a rooftop extension, with a tower building immediately adjacent on the northern and western flanks, the options available to the applicant is more limited. However, the application must still maximise measures and provide robust justification if adopted targets are not met.

#### Be Lean

30. To reduce energy demand, a range of passive and fabric first approach measures have been considered. While the site's location and requirement to integrate with the existing hospital and construction limits the ability to influence the built form, the close proximity to the tower building will help to shield the proposed ward from prevailing winds, and a light weight modular is adopted to reduce the loading on the building below.
31. Natural ventilation is not appropriate given the clinical function of the proposed ward, therefore mechanical ventilation with 100% fresh air throughout with heat recovery at 73% efficiency. All lighting within the building utilises LED complete with automatic lighting controls where appropriate. The specified sanitary appliances will utilise low use fittings throughout so that the water consumption is minimised.

#### Be Clean

32. The proposed systems utilise a combination of new and existing systems to support the development. Due to the building being a roof top extension to a larger site, the ability to influence the systems and future connections are limited, however the thermal performance of the modular building exceeds building regulations performance as follows:
33. Floor 0.15 W/m<sup>2</sup>K (Building Regulations requirement = 0.18 W/m<sup>2</sup>K)
- Walls 0.18 W/m<sup>2</sup>K (Building Regulations requirement = 0.26 W/m<sup>2</sup>K)
  - Windows 1.6 W/m<sup>2</sup>K (Building Regulations requirement = 1.6 W/m<sup>2</sup>K)
  - Flat Roof 0.15 W/m<sup>2</sup>K (Building Regulations requirement = 0.18 W/m<sup>2</sup>K)
- The additional energy benefit of connecting back to the existing hospital infrastructure from an electrical, background heating and domestic hot water perspective is that it will allow for beneficial gain when the wider site infrastructure and primary electrical grid are decarbonised. Any wider system integration such as CHP, or a district heating network connection will directly benefit the new rooftop ward development.

#### Be Green

34. In this stage, the applicant is required to maximise the use of onsite renewable technologies to further reduce carbon emissions.
35. The roof of the A&E Department is currently occupied by a series of photovoltaic panels (PV) and it is proposed to relocate these to the rooftop of adjacent buildings, Blocks JJ, and the eastern ends of Block Q and the A&E Department roof. The re-use of the panels is welcomed, particularly as they would continue to offset c.3 tonnes of carbon per annum.
36. Air Source Heat Pumps (ASHP) are not considered to be appropriate due to the weight constraints of including this on the roof of the A&E Department.
37. Any shortfall in achieving the target emissions standards is to be compensated for by a financial contribution to the Council's Carbon Offsetting Fund, based on the notional price per tonne of carbon of £95 over a period of 30 years, or through off-site measures to be agreed with the Council. The carbon emissions have been calculated at 15.56 kg CO<sub>2</sub>/m<sup>2</sup>/annum (a saving of 5.9%). Whilst this is below 35% reduction required within the London Plan, given that the proposal is for a roof top extension and connected to the existing heating system, the benefits of the proposal are considered to outweigh the limited harm. Therefore in accordance with the London Plan, the remaining regulated carbon dioxide emissions, to 100%, are required to be off set through a cash in lieu contribution to secure delivery of carbon dioxide savings elsewhere. This is calculated to be £62,700 over 30 years and will be secured via a S106 Agreement. Be seen monitoring is also to be secured within the Section 106 Agreement.

#### BREEAM assessment

38. Policy BSUI1 seeks for major non-residential developments to achieve a BREEAM standard of 'Excellent'. The scheme is proposing to target BREEAM 'Very Good' with a potential target of 67.78% which is marginally below 70% target for a 'Excellent' rating. The applicant has advised that as the development involves an upwards extension, there is limited scope for ecological gains or sustainable drainage measures, which restricts the credit scoring. The scheme is therefore targeting a BREEAM 'Very Good' rating as a minimum. Whilst this does not fully comply with policy BSUI1, the constraints of

the site are acknowledged and the benefits associated with the development are considered to outweigh the limited harm. Such details are recommended to be conditioned to any forthcoming consent.

## Air Quality

39. With the site located in a designated Air Quality Management Area, London Plan Policy SI1 and Local Plan Policy BSUI2 (Air quality) require the submission of an Air Quality Assessment (“AQA”) to quantify pollutant levels across the site, consider its suitability for the proposed end-use and assess potential construction phase impacts as a result of the proposed development. An AQA prepared by NoiseAir Acoustics & Air Quality has been submitted in support of the application.

There is the potential for air quality impacts as a result of fugitive dust emissions from the site (dust, particulate matter (PM10 and PM2.5)) during the construction phase of the development and their impacts were assessed in accordance with the Institute of Air Quality Management (“IAQM”) methodology. The sensitivity of the area to changes in dust and PM10 has been established for each of the construction activities considered, and are shown in the table below:

Potential Impact	Sensitivity of the Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	High	N/A	High	High
Human Health	Medium	N/A	Medium	Medium

40. The predicted dust emission magnitude has been combined with the defined sensitivity of the area to determine the risk of impacts during the construction phase prior to mitigation, to establish the level of mitigation that would be required, as per Table 2 below:

Table 2: Summary Dust Risk Defining Site Specific Mitigation (Source: Air Quality Assessment, Table 7)

Potential Impact	Risk			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Low	N/A	Medium	Low
Human Health	Low	N/A	Medium	Negligible

41. The AQA considers that the greatest impact on air quality is emissions from vehicles and plant associated with the construction phase will be in the areas immediately adjacent to the site access road. Construction traffic will access the site via the local road network. Due to the size of the site, it was considered likely that the construction traffic will be low in comparison to the existing traffic flows on those roads. Based on the current local air quality in the area, the proximity of sensitive receptors to the roads likely to be used by construction vehicles, and the likely numbers of construction vehicles and plant that will be used, the impacts are therefore considered to being negligible according to the assessment significance criteria.
42. Assuming good practice dust control measures are implemented, as detailed within Section 6 of the AQA, the residual significance of potential air quality impacts from dust generated through construction activities is predicted to be negligible. Those mitigation measures would be subject to an appropriately worded condition, as would a condition recommended by Environmental Health in relation to all non-road mobile machinery (NRMM).

### Air Quality Neutral Assessment

43. An Air Quality Neutral Assessment was included within the AQA. Whilst policy BSUI2 seeks for major developments in Growth Areas to be Air Quality Positive, given that the development is wholly based on connecting to existing systems and with no additional vehicular trips being generated, and this it is considered to be air quality neutral, the lack of compliance with Air Quality Positive in this instance is considered to be outweighed by the wider benefits of the proposal.
44. The Council's Environmental Health Officer is satisfied with the results of the Air Quality Assessment and

advises that conditions are not required to be imposed in relation air quality.

### Air Quality Conclusions

45. The potential impact from dust soiling and to human health throughout the whole construction process is considered to be low to negligible and on the basis of the information provided, the operation of the building itself would not produce any emissions because it will connect to existing systems.
46. Due to the design of the building and measures to be secured by condition, it is considered that the proposed development would not expose users or nearby residents to undue levels of pollution, in compliance with London Plan Policy S11 and Local Plan Policy BSUI2.
47. The submission demonstrates that the development will be Air Quality Neutral but has not been accompanied by an Air Quality Positive assessment in line with Local Plan Policy BSUI2. Nevertheless, this is considered to be acceptable on balance having regard to the benefits of the development, noting that the scheme will achieve Air Quality Neutral and there is no harm associated with the proposal in this regard.

### **Flood Risk/Drainage/Water Consumption**

#### Drainage/SuDS

48. London Plan Policy S113 and Local Plan Policy BSUI4 requires development to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. They also require proposals to achieve greenfield run-off rates and adequately manage surface water run-off. London Plan policy S113 further sets out a drainage hierarchy to ensure that run-off water is managed as close to its source as possible and gives preference to green over grey features.
49. There is limited scope for achieving greenfield runoff rates due to the proposal being a rooftop extension. As the roof area remains the same, there would be no need for additional measures, and this has been confirmed by the council's Drainage & Flooding Engineer (LLFA). The submitted Drainage Strategy confirms that the existing building is served by below and above ground drainage installations and that all existing rainwater outlets, soil vent pipes, waste vent pipes and anti-syphon pipes will all be raised to be incorporated into the proposed extension.

### **Ecology and Biodiversity**

50. London Plan Policy G6 D (Biodiversity and access to nature) seeks to ensure that proposals manage impacts on biodiversity and aim to secure net biodiversity gain. Local Plan Policy BG11 (Green and blue infrastructure) promotes the enhancement and support of biodiversity and ensuring that developments do not undermine the biodiversity of green chains.
51. London Plan Policy G5 (Urban greening factor) identifies that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Proposals should include a maintenance plan for the lifetime of the development. Planning obligations may also be sought to cover future maintenance of green infrastructure.

Table 8.2 of the London Plan introduces an Urban Greening Factor ('UGF') to identify the appropriate amount of urban greening required in new developments. Local Plan Policies BG11 (Green and Blue Infrastructure in Brent) seeks to apply the Urban Greening Factor in London Plan Policy G5 to developments in the borough. The Mayor recommends a target UGF of 0.3 for predominately commercial development. The UGF score for this development is 0.32 and this is achieved by providing / improving soft landscaped areas around the wider hospital site.

52. Strictly speaking, a UGF calculation should only include land within the redline area for the application, however in this instance, it is recognised that due to the significant site constraint of being a rooftop development, there is very limited opportunity to provide improvements within the redline due to the need to locate the AHU unit (and enclosure) on the proposed roof, in addition to other plant. Moreover, the weight of a green roof could not be supported. Officers are therefore of the opinion that improvements around the wider hospital, amounting to approximately 900 sqm and inclusive of two areas outside of the A&E Department, is an acceptable compromise.

53. The proposed development, although including urban greening improvements outside of the redline area, would have a positive impact on the environment in accordance with Policy G5 of the London Plan and Policy BGI1 of the Local Plan.

#### Biodiversity Net Gain

54. Biodiversity net gain (BNG) is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost, notwithstanding that losses should, in the first instance, be avoided.
55. Being a rooftop extension, there is no loss of habitat and there is no opportunity to create any habitat on the roof because of the structural integrity of the roof. As discussed above, landscaping improvements are being made elsewhere around the wider hospital site.
56. On balance, the proposed development is considered to comply with Policy G6 of the London Plan and Local Plan Policy BGI1. Conditions would be imposed to ensure that details of the landscaping and biodiversity enhancements are secured.

#### Fire Safety

57. Although acknowledging that fire safety compliance is a matter for the Building Regulations, Policy D12 of the London Plan requires all major proposals to submit a Fire Statement. The Statement should demonstrate that the development would achieve the highest standards of fire safety by reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape. A Fire Statement has not been submitted, although it would be expected that being a hospital, the extension will be constructed to the highest of standards, and could reasonably be dealt with under building regulations.

#### Equalities

58. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

#### Conclusions

59. Having regard to all of the above, it is considered planning permission should be granted for the following reasons:
60. The proposed development will serve to improve services at Northwick Park Hospital, to the benefit of the borough and Greater London. The proposed development is considered to comply with Policies GG3, S1 and S2 of the London Plan, Policies BP4, BNWGA1A and BSI1 of the Local Plan, and with guidance contained within the National Planning Policy Framework.
61. The proposed development, due to its design, size, scale and siting, contributes to optimising the capacity of the site and does not unduly detract from the character and appearance of the street scene or the surrounding area, having regard to Policies D3, D4, D8 of the London Plan, Policies DMP1, BD1 and BD2 of the Local Plan, and with guidance contained within the National Planning Policy Framework and Brent Design Guide SPD1.
62. The proposed development, due to its siting, does not unduly impact on the amenities of the existing or future occupiers of nearby properties in terms of loss of light, outlook, privacy, overlooking, and overshadowing. In this respect the development complies with Policy D3 of the London Plan, Policies DMP1 and BD1 of the Local Plan, and with guidance contained within the National Planning Policy Framework and Brent Design Guide SPD1.
63. The proposed development, by virtue of measures proposed and conditions imposed, would contribute to

the mitigation of and adaptation to climate change, having regard to Policies GG6, G1, G5, G6, SI1, SI2, SI3, SI4, SI5, SI7, SI12 and SI13 of the London Plan, Policies DMP1, BG11, BSUI1, BSUI2, BSUI3, BSUI4, BT1, and BT2 of the Local Plan, and with guidance contained within the National Planning Policy Framework.

## DRAFT DECISION NOTICE



# Brent

## DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

## DECISION NOTICE – APPROVAL

Application No: 23/2262

To: Mrs Clarke  
Bramhall Town Planning  
6 Station View (Rhino Court)  
Hazel Grove  
Stockport  
SK7 5ER

I refer to your application dated **04/07/2023** proposing the following:

Relocation of a hospital ward, incorporating the construction of a rooftop extension to the existing Accident and Emergency Department to create the new ward with staircase links and level access covered walkway to the hospital tower building and associated infrastructure (Use Class C2)

and accompanied by plans or documents listed here:  
Refer to condition 2

at **Northwick Park Hospital, Watford Road, Harrow, HA1 3UJ**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 05/12/2023

Signature:

**Gerry Ansell**  
Head of Planning and Development Services

### Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

## SUMMARY OF REASONS FOR APPROVAL

- 1 The proposed development is in general accordance with policies contained in the:-

National Planning Policy Framework 2021  
London Plan 2021  
Brent Local Plan 2019-2041

- 1 The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

Reason: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990.

- 2 The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

- |                                |                            |
|--------------------------------|----------------------------|
| • DAY-XX-ZZ-DR-A-020001 REV.C  | Site Location Plan         |
| • DAY-XX-ZZ-DR-A-020002 REV.A  | Existing Block Plan        |
| • DAY-XX-01-DR-A-200112 REV.A  | Existing SE Elevation      |
| • DAY-XX-ZZ-DR-A-200113 REV.A  | Existing SW Elevation      |
| • DAY-XX-ZZ-DR-A-0200114 REV.A | Existing North Elevation   |
| • DAY-XX-ZZ-DR-A-0200115 REV.A | Existing NE Elevation      |
| • DAY-XX-00-DR-A-200001 REV.K  | Proposed GA Plan           |
| • DAY-XX-01-DR-A-200111 REV.A  | Proposed Roof Plan         |
| • DAY-XX-ZZ-DR-A-0200102 REV.D | Proposed SE Elevation      |
| • DAY-XX-ZZ-DR-A-200103 REV.D  | Proposed SW Elevation      |
| • DAY-XX-ZZ-DR-A-0200104 REV.E | Proposed North Elevation   |
| • DAY-XX-ZZ-DR-A-0200105 REV.E | Proposed NE Elevation      |
| • DAY-XX-ZZ-DR-A-0200106 REV.B | Proposed Section           |
| • DAY-XX-ZZ-RP-A-000902 REV.A  | External Materials Palette |
| • DAY-XX-ZZ-DR-A-010110 REV.B  | Perspective View A         |
- Air Quality Assessment Report prepared by Noise Air Acoustics & Air Quality dated 16th June 2023 (Report Ref: P6379-R1-V1),

Reason: For the avoidance of doubt and in the interests of proper planning.

- 3 All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>.

Reason: To protect local amenity and air quality in accordance with London Plan Policy SI1 and Local Plan Policies BSUI1 and BSUI2.

- 4 The development shall be carried out during the construction phase in accordance with the

mitigation measures as set out within chapter 6 of the Air Quality Assessment Report prepared by Noise Air Acoustics & Air Quality dated 16th June 2023 (Report Ref: P6379-R1-V1), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect local amenity and air quality in accordance with London Plan Policy SI1 and Local Plan Policies BSUI1 and BSUI2.

- 5 The external finishing materials for the development hereby approved shall match those as detailed on Drawing No.DAY-XX-ZZ-RP-A-000902 REV.A "External Materials Palette", unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure a satisfactory development which does not prejudice the amenity of the locality.

- 6 The use of the development hereby approved shall not commence unless details of soft landscaping within the wider hospital site to achieve a target Urban Greening Factor of 0.3 (including the requirement to submit a UGF Masterplan and a schedule detailing size and number of proposed planting species) have been submitted and approved by the Local Planning Authority and the approved soft landscaping proposals have been implemented in full.

Any new planting which dies, is removed, becomes severely damaged or diseased within five years of planting shall be replaced. Replacement planting shall be in accordance with the approved details (unless the Local Planning authority gives its written consent to any variation).

Reason: To safeguard and enhance the character and amenity of the area, to provide ecological, environmental and biodiversity benefits.

- 7 The use of the development hereby approved shall not commence unless details of the relocation of the existing photovoltaic panels to alternative locations within the wider hospital site have been submitted and approved by the Local Planning Authority, and thereafter the photovoltaic panels have been installed in accordance with the agreed approved details.

Reason: To secure appropriate carbon off setting measures within the hospital site.

- 8 Any plant shall be installed, together with any associated ancillary equipment, so as to prevent the transmission of noise and vibration into neighbouring premises. The rated noise level from all plant and ancillary equipment shall be 10dB(A) below the measured background noise level when measured at the nearest noise sensitive premises. An assessment of the expected noise levels shall be carried out in accordance with BS4142:2014 'Methods for rating and assessing industrial and commercial sound.' and any mitigation measures necessary to achieve the above required noise levels shall be submitted to and approved in writing the Local Planning Authority. The plant shall thereafter be installed and maintained in accordance with the approved details

Reason: To protect acceptable local noise levels.

- 9 Within six months from practical completion of the non-domestic floorspace hereby approved, a revised BREEAM Assessment and Post Construction Certificate, demonstrating compliance with the BREEAM Certification Process for non-domestic buildings and the achievement of a minimum BREEAM Very Good rating, shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure the non-domestic floorspace is constructed in accordance with sustainable design and construction principles, in accordance with Brent Local Plan Policy BSUI1.



Any person wishing to inspect the above papers should contact Sean Newton, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5166