

# COMMITTEE REPORT

Planning Committee on  
Item No  
Case Number

29 March, 2021  
03  
20/0700

## SITE INFORMATION

RECEIVED	26 February, 2020
WARD	Northwick Park
PLANNING AREA	
LOCATION	Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA1
PROPOSAL	<p>Outline planning permission (with all matters reserved apart from the means of access) for demolition of existing buildings on site and provision of up to 1,600 homes and up to 51,749 sqm (GIA) of new land use floorspace within a series of buildings, with the maximum quantum as follows:</p> <ul style="list-style-type: none"><li>- (Use Class C3) Residential: up to 1,600 homes;</li><li>- 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)</li><li>- up to 412sqm floorspace (GIA) of a replacement nursery (Use Class D1)</li><li>- up to 1187sqm (GIA) of flexible new retail space (Use Class A1, A2, A3)</li></ul> <p>Together with energy centre, hard and soft landscaping, open space and associated highways improvements and infrastructure works</p> <p>This application is subject to an Environmental Statement</p>
PLAN NO'S	Please see Condition 4.
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_&lt;systemke">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&amp;keyVal=DCAPR_&lt;systemke</a></p> <p><b><u>When viewing this as a 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 "20/0700" (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:

Referral to the Mayor of London (stage II referral)

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. Definition of Phases: The Highway Works Phase represents works to construct a spine road and associated junction improvements on Watford Road; Phase 1 represents Blocks C1, C2, C3 and C4 and associated streets and landscaping; Phase 2a represents Block B1 and associated landscaping; Phase 2b represents the land in the ownership of Brent Council; Phase 3 represents Blocks D1, D2, D3, D4, D5, D6 and D7 and associated streets and landscaping; Phase 4 represents Block E1 (all buildings) and associated streets and landscaping.
4. Affordable housing
  - (a) Provision of a minimum of 40% of the residential units in Phases 1, 2a and 3 (calculated by habitable room) as Affordable housing, to include:
  - (b) a minimum of 13% for Affordable Rent at London Affordable Rent levels, and a minimum of 4% for Affordable Rent at London Living Rent levels, in accordance with the Mayor of London's Affordable Housing Programme 2016-2021 Funding Guidance (dated November 2016) or the necessary guidance as it is updated and subject to an appropriate Affordable Rent nominations agreement with the Council, securing 100% nomination rights on first lets and 75% nomination rights on subsequent lets for the Council.
  - (c) a minimum of 8% for Affordable Rent at rent levels not exceeding 80% of market rent, and subject to an appropriate Affordable Rent nominations agreement to be agreed with the Council.
  - (d) the remaining units for Shared Ownership, (as defined under section 70(6) of the Housing & Regeneration Act 2008, subject to London Plan policy affordability stipulations that total housing costs should not exceed 40% of net annual household income, disposed on a freehold / minimum 125 year leasehold to a Registered Provider), and subject to an appropriate Shared Ownership nominations agreement with the Council, that secures reasonable local priority to the units.
  - (e) In the event that development in any of Phases 1, 2a and 3 does not commence within 24 months either under this permission or under reference 20/0701, an appropriate early stage review mechanism to secure additional on-site affordable housing, or an on-site provision of affordable housing that complies more closely with Brent's policy target affordable housing tenure split, as demonstrated to be achievable through financial viability assessments.
  - (f) An appropriate mid stage review mechanism against the agreed base appraisal, assessing actual residential sales values, and securing any additional deferred affordable housing obligations as per an agreed formula. prior to occupation of 70% of units in Phase 1, either under this permission or under reference 20/0701.
  - (g) An appropriate mid stage review mechanism against the agreed base appraisal, assessing actual residential sales values, and securing any additional deferred affordable housing obligations as per an agreed formula. prior to occupation of 70% of units in Phase 2a, either under this permission or under reference 20/0701. This could be concurrent with the Phase 1 review at 4(f) above if the two Phases are delivered concurrently;
  - (h) An appropriate late stage review mechanism against the agreed base appraisal, assessing actual residential sales values, and securing any additional deferred affordable housing obligations as per an agreed formula, prior to occupation of 70% of units in Phase 3.
5. Student accommodation
  - (a) Nomination rights for University of Westminster
  - (b) Provision of the maximum reasonable amount of the student accommodation as affordable student accommodation up to a maximum of 35%, with the submission of a Financial Viability Appraisal required at Reserved Matters stage in the event that less than 35% of the student accommodation is provided as affordable.
  - (c) In the event that less than 35% of the student accommodation is provided as affordable, appropriate

early stage, mid stage and late stage viability reviews against the agreed base appraisal, and securing any additional affordable student accommodation obligations as per an agreed formula.

6. Delivery of landscaping and public realm works in Phase 2b to an approved landscaping scheme, prior to first occupation of Phase 3 and at no cost to the Council.
7. Submission, approval and implementation of a Training and Employment Plan to provide opportunities for Brent residents during construction and operation stages prior to the relevant Phase.
8. Sustainability and energy
  - (a) Detailed design stage and post-construction stage energy assessments, initial and final carbon offset payments and / or off-site carbon offsetting measures for each of Phases 1, 2a, 3 and 4
  - (b) BREEAM pre-construction assessment and post-completion certificate for Phases 2a and 4
9. Hospital Multi-storey car park (LPA ref 19/4272): To be operational prior to commencement of works on Phase 1 or 2a.
10. Hospital Energy Centre (LPA ref 20/3152): To be operational prior to commencement of works on Phase 2a.
11. Submission, approval and implementation of traffic management and routing arrangements during construction including for buses as required, securing retention of access to hospital facilities, of each relevant Phase.
12. Financial contributions (all to be appropriately phased):
  - (a) To Brent Parks for upgrade of Northwick Park Pavilion (£250,000 to be paid prior to the commencement of works on the earlier of Phases 1 and 2a, and £500,000 to be paid prior to the commencement of works on the earlier of Phases 3 and 4)
  - (b) To TfL for Northwick Park station upgrade and bus services (the greater of £1.5m or 15% of the costed works to the Station as identified within the capacity study, apportioned 67% Network Homes land to 33% University of Westminster land, to be paid prior to the commencement of works on Phase 3 and Phase 4 respectively)
  - (c) To Brent Parks for biodiversity enhancements on park edge (£10,000 to be paid prior to the commencement of works on the earlier of Phases 1 or 2a, and £30,000 prior to the earlier of Phases 3 and 4)
  - (d) To Brent Highways for implementation of Controlled Parking Zones in the area (£200,000 prior to the commencement of works on Phase 1)
  - (e) To Brent Highways for street tree planting to mitigate any net loss of trees on site (£tbc based on submission of replacement tree planting schedule, prior to the completion of Phase 4 or within 3 years of completion of Phase 3, whichever is the sooner)
13. Residential and commercial Travel Plans to be submitted and approved prior to occupation or use of each Phase, implemented and monitored, to include three years free car club membership for all eligible new residents) and parking permit restrictions to apply to all new residential units
14. Highway works to be completed prior to occupation or use of any buildings, either under this permission or under reference 20/0677. Construction and adoption of streets through s38 agreement, connection to highway access and to PROW 100 route to Northwick Park Underground Station.
15. Feasibility study for works to upgrade Northwick Park Underground Station to be commissioned prior to material start and completed within nine months of commencement (unless already carried out pursuant to planning consent reference 20/0701).
16. Any other planning obligation(s) considered necessary by the Head of Planning

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

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 Limits for Reserved Matters
2. Approval of Reserved Matters details
3. Time Limits for Commencement of Development
4. Approved drawings and documents
5. Restrictions on commercial uses
6. Restrictions on nursery use
7. Restriction on size of commercial units
8. Number of units and family sized units
9. Maximum heights
10. No C3 to C4 conversions without planning permission
11. Adaptable and accessible accommodation
12. Water consumption limits
13. Non-Road Mobile Machinery
14. Compliance with drainage strategy
15. Compliance with air quality assessment
16. Tenure blind development
17. Timing for provision of communal amenity space and public realm
18. Residential design standards
19. Residential parking standards
20. University parking standards
21. Pre Phase 3 nursery and community space assessment
22. Pre Phase 3 specialist older people's housing assessment
23. Pre Phase 4 solar glare assessment
24. Communal TV aerial
25. Residential sound insulation and noise reduction

#### *Pre-commencement*

26. Phasing Plan
27. Construction Method Statement
28. Construction Environmental Management Plan
29. Construction Logistics Plan
30. Arboricultural Method Statement

#### *Pre-construction*

31. Details required under reserved matters – general
32. Land Contamination and Remediation

#### *During construction*

33. Landscape scheme
34. Phase 3 public art strategy
35. Wind mitigation measures
36. Balcony screening
37. Fire strategy
38. District heating network
39. PV panels

#### *Pre occupation*

40. Lighting, signage and wayfinding strategy
41. Commercial frontage and signage strategy
42. Meanwhile use strategy
43. Community use of University sports facilities
44. Sound insulation between residential and non-residential uses
45. Plant noise assessment
46. Extract ventilation and odour control
47. Car Park Management Plan
48. Bird Hazard Management Plan
49. Delivery and servicing plan
50. Thames Water surface network upgrades

## 51. Thames Water foul water network upgrades

### *Post-completion*

## 52. Ecological monitoring


Informatives as set out at the end of this report.

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.

That, if by the "expiry date" of this application (subject to any amendments/extensions to the expiry date agreed by both parties) the legal agreement has not been completed, the Head of Planning is delegated authority to refuse planning permission.

That the Committee confirms that adequate provision has been made, by the imposition of conditions and obligations, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

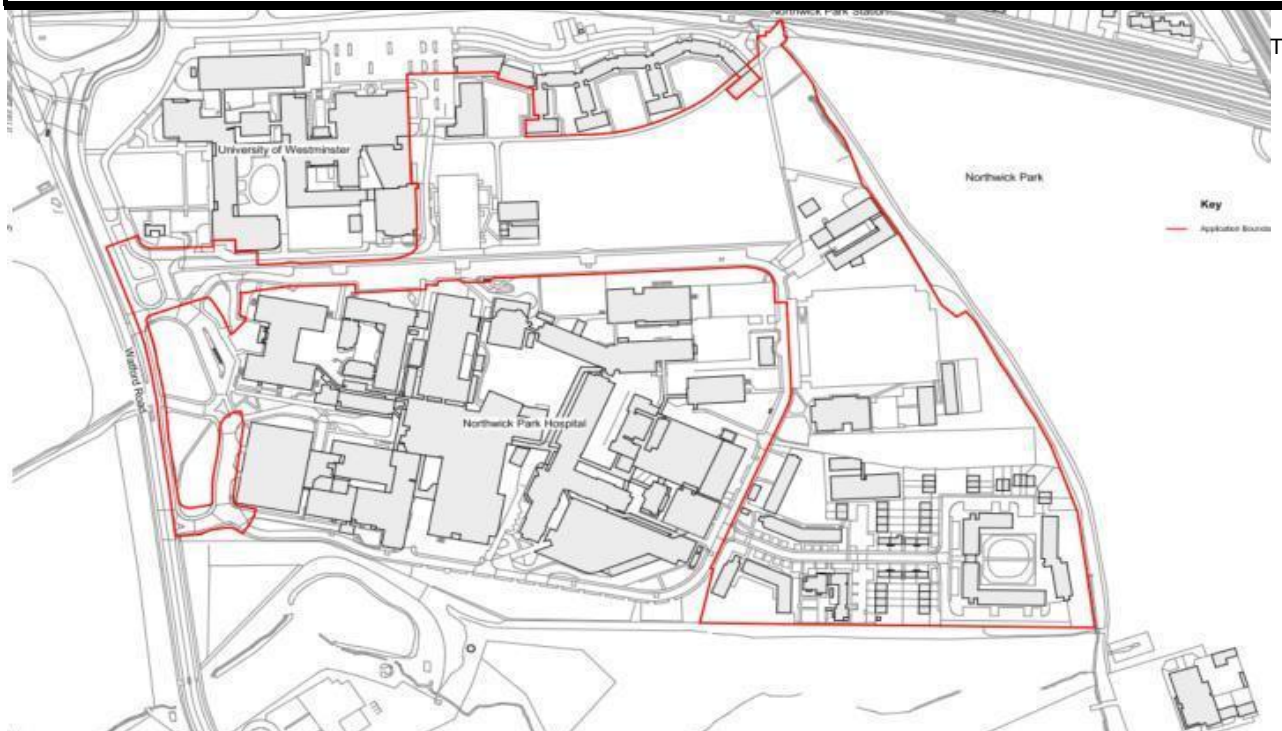
## SITE MAP

**Brent**

### Planning Committee Map

Site address: Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA1

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map is indicative only.

## PROPOSAL IN DETAIL

The proposal is for outline planning permission, with all matters reserved except for means of access. All of the existing buildings would be demolished to allow for the comprehensive redevelopment of the site, which is expected to come forward in phases as follows:

- Highway works: Road improvement works on the Hospital spine road and associated junction improvements on Watford Road, to create a two-way access road into the site;

(An application for full planning permission, reference 20/0677, has also been submitted for the highway works. This application was granted planning permission on 04/12/2020, and therefore the highway works could be implemented in advance of the application for outline permission being granted).

- Phase 1: Residential development consisting of four buildings on part of the Network Homes site currently comprising ancillary facilities.
- Phase 2a: Mixed use development consisting of one building comprising 1,186sqm of flexible retail floorspace (A1/A2/A3) (now Use Classes E(a), E(b) and E(c)), 405sqm of nursery floorspace (D1) (now Use Class E(f)), and residential units, on the part of the Network Homes site currently comprising the boiler house and associated structures.

(An application for full planning permission, reference 20/0701, has also been submitted for Phases 1 and 2a. Application reference 20/0701 was presented to Planning Committee on 09/12/2020, where the Committee resolved to grant consent subject to completion of Section 106 Agreement and stage 2 referral to the GLA. If this is granted, this part of the site could be redeveloped accordingly without recourse to the application for outline permission being granted).

- Phase 2b: Landscaping and public realm improvements on the Brent triangle land;
- Phase 3: Residential development consisting of seven buildings on part of the Network Homes site currently providing existing residential accommodation.

(Phases 1, 2a and 3 together would deliver up to 1,600 residential units.)

- Phase 4: Development on the University of Westminster campus, comprising seven buildings providing 50,150sqm of new university floorspace, the indicative mix being:
  - 20,000sqm of student accommodation (approx 800 student bedspaces);
  - 17,825sqm of educational facilities;
  - 8,500sqm of leisure facilities;
  - 8,825sqm of community and retail uses (formerly Use Classes A1/A2/A3 and D1, now Use Classes E(a), E(b), E(c), E(f) or F.2(b)).

The application is made on behalf of the Northwick Park Partnership, which comprises the four landowners working together under the One Public Estate programme. The two applications for full planning permission (20/0677 and 20/0701) would be linked together with this application through an overarching s106 agreement.

Minor amendments to the proposed road layout were made during the course of the application. These did not materially alter the nature of the scheme and did not require reconsultation, however they are discussed in paragraphs 252 to 265 in the main report.

Figures in the Arboricultural Impact Assessment have been corrected. These originally overstated the number of trees affected in the outline application site due to double counting (the highways application and detailed application are not affected). The figures in paragraph 189 represent the corrected figures. This represents an improvement on the situation consulted on, and did not require reconsultation.

## EXISTING

The site is 12.87ha in total area and comprises the following four land parcels:

- To the north of the Hospital is a roughly square shaped area of land forming part of the University campus, primarily open space but including three small buildings originally built as temporary facilities following a fire in 2007.
- To the east and northeast of the Hospital is a roughly triangular piece of land owned by Network Homes containing a number of buildings providing ancillary hospital facilities (a boiler house and pump room, a staff social club, and temporary buildings housing a nursery and an occupational health team) and existing residential accommodation, together with surface car parking serving the Hospital.
- To the far northeast of the Hospital is a smaller triangle of open land owned by Brent Council.
- Finally, running along the north and west of the Hospital are sections of the existing Hospital spine road and accesses from Watford Road, which operate as part of a one-way system around the Hospital buildings and also provide some roadside surface level parking.

The site is bounded by Watford Road to the west, which provides vehicular and pedestrian access into the site, and by a raised railway line serving Metropolitan Line trains to the north. The eastern boundary and part of the southern boundary is with Northwick Park itself and the remainder of the southern boundary is with a private golf club. The Brent Council land provides pedestrian access to Northwick Park Underground Station via a tunnel underneath the railway tracks.

The site is not in a Conservation Area and does not contain any listed buildings. The land owned by Brent Council is designated Metropolitan Open Land.

## SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Thirteen letters of objection were received regarding some of these matters. Members will have to balance all of the planning issues and objectives when making a decision on the application, against policy and other material considerations.

**Neighbour objections:** Thirteen neighbour objections have been received, raising concerns about the loss of green space, the scale of development, loss of biodiversity, loss of existing housing, increased traffic and parking demand, and construction nuisance. These issues are considered at the relevant points in the report.

**Principle of development:** The proposal would provide a significant amount of new housing (up to 1,600 new homes), together with a significant expansion of the University of Westminster Harrow Campus (up to 50,150sqm of teaching facilities, sports facilities and ancillary leisure and commercial uses, and student accommodation with up to 800 student bed spaces), a new access road from Watford Road and associated junction improvements, small scale commercial units to serve local needs and a replacement nursery. An area of designated open space within the university site would be replaced by a range of areas of landscaped public open space. The loss of other existing uses including existing housing is considered acceptable in this case and has been considered through the proposed Growth Area site allocation of which the application site forms part. A contribution of £750,000 to the upgrading of Northwick Park Pavilion would be secured to reflect the increased demand for community facilities arising from the new population. The proposal is acceptable in principle subject to other material planning considerations.

**Affordable housing and housing mix:** The proposal would provide 40% (by habitable room) affordable homes (including 13% for London Affordable Rent). While the overall proportion of London Affordable Rented homes is not in line with the percentage specified in DMP15, it has been demonstrated that the scheme would deliver the maximum reasonable number of Affordable homes on a policy compliant basis (70:30 ratio of London Affordable Homes to Intermediate), but with additional Affordable Homes delivered, lowering the levels of profit associated with the scheme. These would be delivered as intermediate rented homes, London Living Rent homes and shared ownership homes, and would include housing for NHS keyworkers. Appropriate nominations agreements will be secured within the Section 106 Agreement. The Financial Viability Appraisal submitted with the application has been robustly reviewed on behalf of the Council and is considered to demonstrate that the proposal delivers beyond the maximum reasonable amount of affordable housing that the scheme can support. Early, mid- and late stage review mechanisms would be secured. The overall proportion of family-sized homes (16.6%) is below the levels set out in Brent's adopted and emerging policies. However, a higher proportion would further undermine the viability of the scheme and the provision of Affordable Housing, and the benefits associated with the provision of Affordable

Housing are considered to outweigh the impacts associated with the lower proportion of family housing. Affordable student accommodation would be secured as part of the development of the University Campus.

**Relationship with surrounding area:** The proposal would cause a very limited amount of harm to the openness of the Metropolitan Open Land of Northwick Park by virtue of its scale, height and bulk, however this would be outweighed by the planning benefits of the scheme. There would be no adverse impacts on the Ministry of Defence safeguarding zone or the Capital Ring network of footpaths. Visual impacts on surrounding townscapes have been considered in detail through the submission of a series of representative views, and are considered to be generally acceptable. The proposal would cause less than substantial harm to the settings of a number of Listed Buildings due to taller buildings becoming visible in those settings, but the planning benefits of the scheme are considered to outweigh this harm.

**Impact on neighbouring residential properties:** The proposed buildings would provide sufficient separation distances to retain privacy for existing residents and would not be detrimental to the outlook from existing properties. The impact on daylight to existing student accommodation is considered to be acceptable within the context of the overall scale and density of the scheme, and given the temporary nature of this accommodation. Some overshadowing would occur to existing open amenity spaces, but this would be of a transient nature and of a degree that is considered commensurate with the scale of the proposal.

**Design, scale and appearance:** The proposal would consist of 19 buildings arranged in a coherent and legible layout, with ground floor commercial uses activating the routes from Watford Road and Northwick Park Underground Station. Building heights would step down towards the boundary with Northwick Park and neighbouring housing, and are considered to be appropriate within the surrounding context. Indicative design and landscaping details have been provided to demonstrate that a high quality development could be delivered, creating a variety of character areas and a sense of place for the new residential and academic community.

**Residential living standards:** The proposal would provide up to 1,600 new homes. Whilst no details have been provided of the units proposed because the application is in Outline, design principles have been set out to ensure that all units meet or exceed the relevant policy standards, and that residents would be provided with a range of communal amenity spaces in addition to private balconies and areas of landscaped public amenity space.

**Wind microclimate:** Future wind conditions have been predicted and would be generally suitable for the intended uses. Some instances have been identified where residential balconies would require mitigation measures to achieve the desired wind conditions and these would be secured by condition.

**Green infrastructure and natural environment:** The proposal would involve the loss of 387 trees on site, although these only include one tree of high quality which would need to be removed to allow for junction improvements on Watford Road. The potential for protected species including bats to be present on site was surveyed, but no evidence of any protected species was found and the site is considered to have low suitability to support protected and priority species. Trees along the boundary in Northwick Park would be protected and retained, and new tree planting would mitigate the loss of existing trees together with a financial contribution to street tree planting in the event of any net loss of trees on site. The removal of trees and disturbance caused by construction work and the loss of an area of meadow would be compensated for by a financial contribution of £30,000 towards off-site biodiversity enhancement measures. The indicative design and landscaping details demonstrate that the proposal would increase the provision of green infrastructure on site.

**Flood risk and drainage:** The Flood Risk Assessment identifies small parts of the site and surrounding areas at risk of surface water flooding. However the proposed drainage strategy would deliver a significant reduction in overall discharge rates from brownfield to greenfield rates, and would have a significantly positive impact on the overall flood risk to the site and surrounding area. Furthermore, the implementation of sustainable drainage measures such as blue and green roofs would improve the environmental impact of the development by reducing carbon emissions and providing ecological enhancement.

**Sustainability and energy:** The proposal would utilise a hybrid energy centre solution and is predicted to achieve a 40% reduction in carbon emissions for the residential development and a 37% reduction for the commercial element. This exceeds the on-site target reduction set out in London Plan Policy SI2, and a contribution to Brent's carbon offsetting fund, estimated at this stage to be £4,633,200, would be secured to mitigate the impact of the residual emissions. The commercial floorspace would also achieve a BREEAM Excellent rating, in accordance with Brent Policy CP19 and emerging Policy BSUI1.

**Environmental health:** Air quality, contaminated land, noise and vibration, external lighting and odour emissions from commercial kitchens have been assessed. Suitable conditions have been proposed to secure these matters.

**Transport considerations:** Access would be provided from Watford Road via a new two-way spine road in the place of the northern section of the existing Hospital ring road, and the works would also deliver wider highway benefits. The road layout within the residential and University sites would be designed for minimal vehicle traffic with a high quality environment for pedestrians and cyclists. Residential parking would be provided at a maximum rate of 0.2 spaces per home and no new parking is proposed for the University. A contribution of £200,000 would be secured towards implementing Controlled Parking Zones in the area.



Traffic generation and impacts on the local highway network are considered to be acceptable. The proposal would cause some additional capacity constraints at Northwick Park underground station, and financial contributions would be secured towards increasing capacity and providing step-free access at the station and towards improved bus services.

## MONITORING

The table(s) below indicate the existing and proposed uses at the site and their respective floorspace and a breakdown of any dwellings proposed at the site.

### Floorspace Breakdown

Primary Use	Existing	Retained	Lost	New	Net Gain (sqm)
Non-residential institutions	769		769	405	-364
Shops	0			1186	1186
Sui generis	769		769	50150	42404

### Monitoring Residential Breakdown

Description	1Bed	2Bed	3Bed	4Bed	5Bed	6Bed	7Bed	8Bed	Unk	Total
EXISTING ( Cluster Flats û Market )								596	596	596
EXISTING ( Flats û Market )	32	22	17	0						71
EXISTING ( Flats û Intermediate )	11	13	2							26
EXISTING ( Flats û Key Worker )										0
EXISTING ( Flats û Social Rented )										0
EXISTING ( Flats û Social Rented )										
EXISTING ( Flats/Mais )										
PROPOSED ( Cluster Flats û Market )									0	0
PROPOSED ( Flats û Market )									960	960
PROPOSED ( Flats û Intermediate )									260	260
PROPOSED ( Flats û Key Worker )									104	104
PROPOSED ( Flats û Social Rented )									155	155
PROPOSED ( Flats û Social Rented )									68	68
PROPOSED ( Flats/Mais )									53	53

## RELEVANT SITE HISTORY

### Related applications

20/0701. Full Planning Permission. Decision Pending. Committee resolution to grant 09/12/2020

Full planning permission for demolition of existing buildings and structures on the site, all site preparation works for a residential led mixed-use development comprising 654 new homes, associated car and cycle spaces, a replacement nursery, retail space, associated highways improvements, open space, hard and soft landscaping and public realm works.

20/0677. Full Planning Permission. Granted 04/12/2020

Full planning permission 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.

### University of Westminster

The site was first developed in the 1950s as the Harrow Technical College. It later became part of the Polytechnic of Central London which eventually became the University of Westminster in the 1990s. The campus has been significantly altered and extended over the years.

21/0553: Full Planning Permission - under consideration

Change of use from residential bungalow to children's nursery (Use Class E:(f)) with infill extension, new

modular building, boarded fencing to boundary wall and associated landscaping

## Northwick Park Hospital

The Hospital has been significantly altered and extended over the years.

Recent consents include a permission for the provision of a multi-storey car park to replace the existing surface level car park and a new hospital energy centre, both of which are currently located on land that is within the site for this application (reference 20/0700) and would be re-located adjacent to the hospital.

### 21/3152. Full Planning Permission. Granted. 28/01/2021

Creation of a new Energy Centre with the installation of new chimney to support a Combined Heat and Power unit, hot water boilers and associated equipment to be located within the existing multi-story car park, construction of a new external service area and new private access road from an existing Hospital internal road to the new Energy Centre.

### 19/4272. Full Planning Permission. Granted. 20/05/2020.

Erection of a multi-storey car park on 5 levels for staff only, a separate plant/energy facility and associated works to access road at Northwick Park Hospital.

## CONSULTATIONS

### Neighbour consultation

71 consultation letters were sent to adjoining and nearby owners and occupiers on 20 March 2020.

The application was advertised in the press on 26 March 2020 and site notices were posted on 25 March 2020. The application was advertised as being accompanied by an Environmental Statement and subject to a 30 day consultation period. Site notices were posted by the southern entrance to Northwick Park Station, near the junction of the footpath from the Station and the Hospital ring road, near the existing residential properties on the outline application site, near the main entrance to the Hospital and University from Watford Road, near the western end of Northwick Avenue, and near the junction of Norval Road and The Fairway.

A total of 15 objections have been received, from 13 different addresses. The grounds of objections received refer to the following issues:

Comment	Response
<b>Extent of consultation</b>	
Consultation has been inadequate for a development on this scale. Lockdown should not be used to covertly process applications.	Consultation has been carried out in accordance with statutory requirements and Brent's Statement of Community Involvement, notwithstanding the restrictions imposed by Covid 19. All representations received have been considered and summarised within the committee report.
<b>Principle of Development</b>	
Current Network Homes accommodation is not occupied by students, demonstrating lack of demand for additional student accommodation	Brent's housing targets seek to respond to long-term increases in the need for housing, including for student accommodation. The proposed extension of university teaching facilities is likely to attract additional student numbers and the provision of additional student accommodation is considered appropriate.
There are existing town centres within close proximity and the proposal should not aim to replicate these	The retail units would be small scale and would serve the increase in population.
Hospital trust will not be able to cope with healthcare needs of this number of additional	Increased housing in this area is proposed in Brent's draft Local Plan, which includes careful

residents	<p>consideration of the capacity of local infrastructure and services to meet this growth.</p> <p>The NHS Trust has been consulted on the application and has no objection to the proposals. See below for comments.</p>
<b>Impact on surrounding area</b>	
Unacceptable impact on greenfield land and Metropolitan Open Land.	<p>No development is proposed on Metropolitan Open Land other than landscaping and play facilities. The amount of protected open space within the site would be maintained.</p> <p>See paragraphs 35 to 40 and paragraphs 82 to 87</p>
Unacceptable impact on views to and from Harrow on the Hill.	See paragraphs 92 to 116. The impact is considered to be minimal, and would not cause any harm to any protected views.
<b>Character and appearance</b>	
Increased density of development.	Increased housing in this area is proposed in Brent's draft Local Plan, which includes careful consideration of the capacity of local infrastructure and services to meet this growth.
Excessive scale, height and layout. Increased number of buildings, loss of existing architectural merit and character.	The scale of development is considered appropriate in this location. The proposal would not lead to the loss of any heritage assets or buildings of note.
Loss of pedestrianised areas	The existing site is characterised by poor quality public realm and pedestrian facilities. The proposal aims to contribute towards new public spaces and create greater permeability and legibility throughout the site as envisaged as part of the Northwick Village Masterplan. The proposals have been designed with Secure by Design principles and so would maximise natural surveillance, deter criminal behaviour and create pleasant walking routes resulting in substantial enhancement over the existing situation.
<b>Housing</b>	
Increased accommodation cost and lack of affordable housing.	<p>Affordable housing would be secured on site through a S106 agreement.</p> <p>Please refer to affordable housing section of the report.</p>
Existing housing would be lost and existing residents including NHS keyworkers would be displaced, disrupting existing community.	See paragraphs 62 to 67.
<b>Impact on Amenity</b>	
Increased noise and disturbance	The application identifies necessary noise mitigation measures and demonstrates that predicted noise levels would be acceptable.
<b>Flood risk and drainage</b>	
Flood risk assessment does not adequately address area, which is subject to regular flooding, and an independent assessment	The flood risk assessment and drainage strategy has been reviewed by the Local Lead Flood Authority, and there are no objections on

should be prepared.	these grounds.  See paragraphs 220 to 230.
<b>Transport considerations</b>	
Loss of parking for existing hospital workers	A multi-storey car park (reference 19/4272) is currently under construction to provide replacement parking for NHS staff.  See paragraphs 43 to 44.
Northwick Park Tube Station at full capacity currently	TFL were consulted subject of the proposal and their comments are set out below.
Inadequate parking provision, assuming residents of 1,500 units would have at least 700 cars. Increased parking demand in surrounding area and need for Controlled Parking Zones	The site is in a highly accessible location and low levels of on-site parking are considered acceptable in this area. A financial contribution would be secured towards implementing Controlled Parking Zones in the area, and residents would not be eligible for parking permits.  See paragraphs 280 to 288.
Increased traffic, congestion and delays on road network.	The proposal aims to minimise additional traffic from the development by providing low levels of on-site parking.  See paragraphs 297 to 303
Parking demand by construction workers will create pressure on surrounding parking provision. Temporary car park for construction workers should be provided.	This issue would be managed in the Construction Management Plan and Construction Logistics Plan.  See paragraph 323
<b>Impact on open space</b>	
Increased housing will lead to increased use of Northwick Park for recreation.	The proposal includes a range of communal and public open spaces, in addition to private balconies for each unit. Increased use of Northwick Park is not considered to be detrimental, given its extensive size.
<b>Environmental Impacts</b>	
Increased noise, pollution and dust including from construction process	The application demonstrates that there would be no significant impacts arising from the development so as to result in undue harm in respect of noise and air pollution.  Please refer to Environmental health section of the report which considers the impact of the proposal in these terms.  Construction works and traffic would be managed through a construction management plan and construction logistics plan to minimise impacts during the construction process.
<b>Ecology and Biodiversity</b>	
Loss of trees/wildlife/habitat including bat flight paths	Loss of trees would be compensated for by replacement tree planting and if necessary by financial contributions to additional street tree planting in the area. Loss of habitat would also be compensated for by new landscaping proposals and a financial contribution to

	biodiversity enhancement in Northwick Park. No evidence of bat roosts was found during ecological surveys and construction work would be subject to appropriate ecological safeguards.  See paragraphs 184 to 208
<b>Other</b>	
Area is being transformed by outside developers for profit	Developer profit is not a planning consideration.

**External, internal and statutory consultees:**

**GLA Stage 1 response / TfL comments**

The application does not yet comply with the London Plan and Intend to Publish London Plan; but the possible remedies set out in the Stage 1 report could address these deficiencies. Specific issues are:

**Principle of development**

The proposed optimisation of the site and the contribution to housing targets is supported. While the proposed university, replacement nursery and small quantum of commercial land uses are supported in principle, further clarification is required in respect of the existing and proposed social infrastructure, to ensure there is no net loss generated as part of the proposed development and to ensure the proposed facilities meet identified need. This clarification should address the loss of social infrastructure from the existing site as well as the reduction in the size of the proposed nursery site. Clarification on the relocation of existing residents should also be provided, in line with estate regeneration principles.

**Affordable housing**

The proposals comprise 40% affordable housing by habitable room subject to grant funding, with a 32/68 tenure split, in favour of intermediate housing. Discounting the affordable housing re-provision requirement, this equates to 36% affordable housing on the uplifted accommodation. The submitted viability information is being scrutinised to ensure the maximum quantum and affordability of affordable housing. The applicant must also provide affordable student housing. Early, mid and late stage viability review mechanisms should be secured. Affordability levels for shared ownership and low cost rent units should be confirmed and secured. The need for and provision of key worker housing should be clarified.

**Design and heritage**

The design, layout, height and massing of the scheme is supported. Further detail is required in relation to play space, fire safety and Agent of Change. The proposal will result in less than substantial harm to nearby designated heritage assets, which could be outweighed by public benefits, subject to the independent verification of the viability position as the maximum viable level of affordable housing.

**Transport**

Capacity improvements to Northwick Park Underground Station must be addressed as well as contributions towards the provision of adequate bus services and infrastructure within the site. Issues with modelling need to be addressed. Improvements for walking and cycling are required to positively contribute to the Mayor's targets for sustainable travel.

**Energy**

Further information is required in respect of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council to be addressed in their entirety.

**Water efficiency**

Water efficiency information should be provided for the residential and non-residential components on the development.

**Biodiversity**

The parameter plans and illustrative masterplan do not propose an ecological compensation area of a similar scale and habitat distinctiveness to that being lost through the proposals. Opportunities to provide suitable levels of mitigation off-site should be considered, in co-ordination with the Borough.

**Urban greening**

The UGF should be calculated and provided for the masterplan as a whole, the masterplan area excluding the detailed highways application site, and for the detailed application site area. The UGF should be accompanied by drawing(s) showing the surface cover types used for the calculation. The UGF target score of 0.4 should be met for a predominantly residential development when the detailed highway application area is excluded.

**Trees**

Details of how many trees will be replaced should be provided as well as evidence that the proposed trees provide adequate replacement based on the existing value of the trees removed using an appropriate valuation system.

The GLA comments are discussed further in the main body of the report.

**London Borough of Harrow:** No objection. Recommends reducing height of taller buildings to limit impact and intrusiveness into open views out from Harrow on the Hill, contribution towards relocation of traffic signals, further details on compensatory flood storage and flood performance of buildings.

These comments are discussed further in the main body of the report.

**NHS Clinical Commissioning Group (CCG):** No objection subject to further understanding of the public routes through to Northwick Park Tube Station and the pedestrian route along the new spine road from Watford Road, together with an understanding of keyworker accommodation within the masterplan. Provision of CIL funding should be sought towards Northwick Park Hospital (Officer comment: Allocation of CIL funding is subject to other regulatory controls and decision-making procedures within the Council, and cannot be secured under the planning application. The wider impact of development upon infrastructure is considered within the Draft Local Plan and supported by the Infrastructure Delivery Plan).

**Thames Water:** No objection subject to conditions and informatives.

**London Fire Brigade:** No objection subject to informatives.

**Environment Agency:** No objection.

**Sport England:** No objection.

**Ministry of Defence:** No objection subject to conditions.

**University of Westminster:** No objection.

**Local Lead Flood Authority:** No objection.

**Brent Parks Service:** No objection subject to s106 contributions and obligations.

**Environmental health (including noise control team):** No objection subject to conditions.

**Energy and sustainability:** No objection subject to conditions and subject to s106 contributions and obligations.

## 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  
Brent Core Strategy 2010  
Brent Development Management Policies 2016

Key policies include:

### London Plan 2021

GG1	Building strong and inclusive communities
GG2	Making the best use of land
GG3	Creating a healthy city
GG4	Delivering the homes Londoners need
D1	London's form, character and capacity for growth
D2	Infrastructure requirements for sustainable densities
D3	Optimising site capacity through the design-led approach
D4	Delivering good design

D5	Inclusive design
D6	Housing quality and standards
D7	Accessible housing
D8	Public realm
D9	Tall buildings
D11	Safety, security and resilience to emergency
D12	Fire safety
H1	Increasing housing supply
H4	Delivering affordable housing
H5	Threshold approach to applications
H6	Affordable housing tenure
H7	Monitoring of affordable housing
H8	Loss of existing housing and estate redevelopment
H15	Purpose-built student accommodation
S1	Developing London's social infrastructure
S3	Education and childcare facilities
S4	Play and informal recreation
S5	Sports and recreation facilities
E11	Skills and opportunities for all
HC1	Heritage conservation and growth
HC3	Strategic and Local Views
G1	Green infrastructure
G3	Metropolitan Open Land
G4	Open space
G5	Urban greening
G6	Biodiversity and access to nature
G7	Trees and woodlands
SI1	Improving air quality
SI2	Minimising greenhouse gas emissions
SI4	Managing heat risk
SI5	Water infrastructure
SI12	Flood risk management
SI13	Sustainable drainage
T1	Strategic approach to transport
T2	Healthy streets
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T6.1	Residential parking
T6.5	Non-residential disabled persons parking
T7	Deliveries, servicing and construction
T9	Funding transport infrastructure through planning

#### Brent Core Strategy 2010

CP1	Spatial Development Strategy
CP2	Population and Housing Growth
CP5	Placemaking
CP6	Design & Density in Place Shaping
CP14	Public Transport Improvements
CP15	Infrastructure to Support Development
CP18	Protection and Enhancement of Open Space, Sports and Biodiversity
CP19	Brent Strategic Climate Change Mitigation and Adaptation Measures
CP21	A Balanced Housing Stock
CP23	Protection of existing and provision of new community and cultural facilities

#### Brent Development Management Policies 2016

DMP1	Development Management General Policy
DMP7	Brent's Heritage Assets
DMP8	Open Space
DMP9a	Managing Flood Risk

DMP9b	On Site Water Management and Surface Water Attenuation
DMP10	Capital Ring
DMP11	Forming an Access on to a Road
DMP12	Parking
DMP13	Movement of Goods and Materials
DMP15	Affordable Housing
DMP16	Resisting Housing Loss
DMP18	Dwelling Size and Residential Outbuildings
DMP19	Residential Amenity Space

All of these documents are adopted and therefore carry significant weight in the assessment of any planning application.

The Council is at an advanced stage in reviewing its Local Plan. The draft Brent Local Plan was subject to examination in public during September and October 2020. The planning Inspectors are considering the Plan prior to the Council undertaking a final stage of consultation on a set of proposed main modifications before the Plan can be adopted. Therefore, having regard to the tests set out in paragraph 48 of the NPPF it is considered by Officers that greater weight can now be applied to policies contained within the draft Brent Local Plan.

Relevant policies include:

DMP1	Development management general policy
BP4	North West
BNWGA1	Northwick Park Growth Area
BD1	Leading the way in good urban design
BD2	Tall buildings in Brent
BH1	Increasing housing supply in Brent
BH5	Affordable housing
BH6	Housing size mix
BH10	Resisting housing loss
BH13	Residential amenity space
BSI1	Social infrastructure and community facilities
BE1	Economic growth and employment opportunities for all
BE4	Supporting strong centres diversity of uses
BHC1	Brent's Heritage Assets
BHC2	National Stadium Wembley
BGI1	Green and blue infrastructure in Brent
BGI2	Trees and woodlands
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
BT4	Forming an access on to a road

The following are also relevant material considerations:

The National Planning Policy Framework (revised 2019)  
 Mayor of London's Affordable Housing and Viability SPG 2017  
 Mayor of London's Character and Context SPG 2014  
 Mayor of London's Housing SPG 2016  
 Mayor of London's Play and Informal Recreation SPG 2012  
 Mayor of London's Sustainable Design and Construction SPG 2014

SPD1 Brent Design Guide 2018  
 Shopfronts SPD3 2018

## DETAILED CONSIDERATIONS



## Background

1. The application is made on behalf of Network Homes, the University of Westminster, Brent Council and the NHS Trust. The four landowners are working together under the One Public Estate programme to redevelop the site.
2. A detailed planning application has also been submitted for the redevelopment of part of the Network Homes site to provide 654 new homes and commercial floorspace (ref 20/0701), and Planning Committee resolved to grant permission for that application on 9 December 2020, subject to a GLA Stage II referral and s106 agreement. The proposal is consistent with the outline proposals for Phases 1 and 2a of this application, but is presented in more detail and could be implemented independently of this application. If the detailed proposal is implemented, Phases 1 and 2a of this application would then fall away.
3. A full planning application has also been submitted for highway improvements and works to the Hospital spine road owned by the NHS Trust to create a two-way spine road to adoptable standards that would provide access into the site from Watford Road (ref 20/0677). Planning permission was granted under delegated powers on 4 December 2020. These access arrangements are also included as part of this application, however it should be noted that the works can be implemented independently of this application.
4. The three applications are complementary and would be linked together through s106 agreements.

## Environmental Impact Assessment

5. The application is accompanied by an Environmental Statement (ES). The Council's Scoping Opinion, issued on 16 September 2019, reflected consultation with statutory consultees as identified in the EIA Regulations 2018, and identified a number of topics for consideration as part of the ES. These are addressed in separate chapters of the ES, supported where necessary by technical appendices and identifying mitigation measures for any adverse impacts. The topics below are considered in more detail in the relevant sections of this report as follows:

Topic	Addressed in report
Air Quality	Paragraphs 231 to 233
Built Heritage	Paragraphs 134 to 162
Climate Change	Paragraphs 212 to 230, and 327
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	Paragraphs 120 to 133, 117 to 119, 172, and 241
Ecology and Biodiversity	Paragraphs 184 to 211
Health; Noise and Vibration	Paragraphs 234 to 240, 328
Socio-Economics	Paragraphs 15 to 34
Townscape and Visual Impact Assessment	Paragraphs 92 to 116
Traffic and Transport	Paragraphs 243 to 327
Wind Microclimate	Paragraphs 180 to 183

6. The ES also summarises the evolution of the scheme design, in order to illustrate that the comparative environmental impacts of other ways of developing the site have been assessed. In addition, Chapter

13 of the ES considers the likelihood of intra-project effects, or interactions between multiple individual effects (such as between noise, air quality and traffic on a receptor's amenity). The interaction between heritage, townscape character and representative views would have a minor adverse or moderate adverse impact during demolition and construction, however these would be short-term impacts and are considered to be intrinsic to the development process. The impacts of interactions between ecological receptors in response to the various aspects of ecological enhancement are considered to have a minor beneficial impact.

## **Principle of development**

### Delivery of proposed Growth Area and loss of existing housing

7. The NPPF 2019 expects the planning system to significantly boost the supply of homes including by identifying sites for development, to plan positively for the provision and use of shared spaces, community facilities and other local services, and to promote the efficient use of land in meeting the needs for homes and other uses.
8. Brent's housing targets as set out in Core Strategy Policy CP2 are for an additional 2,200 new homes per year between 2007 and 2026, however the draft London Plan Policy H1 sets out a new target of 2,325 new homes per year and this is reflected in Policy BH1. London Plan Policy H15 also supports purpose-built student accommodation (PBSA) in well connected locations to meet local and strategic need, where it contributes to a mixed and inclusive neighbourhood, if the accommodation is secured for the use of students through nomination agreements with higher education providers, and subject to a proportion of affordable student accommodation being provided. This is also reflected in policy BH7 of Brent's emerging Local Plan.
9. The site is part of the Northwick Park Growth Area proposed in the draft Local Plan (Site allocation BNWGA1), which is expected to provide 2,600 net additional homes over the plan period including specialist accommodation to meet identified needs. The Growth Area also includes the remaining parts of the Hospital and University campus, and the site allocation is intended to stimulate improved Hospital and University facilities, and to deliver a replacement sports pavilion and a small amount of commercial floorspace in addition to new housing.
10. The application would provide up to 1,600 new homes, in addition to 800 student bedspaces. The detailed application reference 20/0701 would provide 654 new homes (these are included in the 1,600 for this application), and would facilitate the development of Phases 1 and 2a of this application without the need for a further reserved matters application.
11. The supporting text to London Plan Policy H1 sets out that non-self-contained student accommodation should count towards housing targets on the basis of 2.5 bedrooms counting as a single home, and on this basis the 800 student bedspaces would deliver 320 new homes in addition to the 1,600 homes identified above (a total of 1,920 new homes). The student accommodation would be delivered in the final phase (Phase 4) of the development so that new students would add to an established residential community, and the new students would account for approx 20% of the total new population. A nominations agreement would be secured as part of the s106 agreement.
12. The existing housing on site consists of 693 units, comprising 11 x 1bed, 13 x 2bed and 2 x 3bed flats (developed under planning permission reference 09/2246), together with 32 x 1bed flats, 22 x 2bed and 17 x 3bed houses, and 596 single ensuite bedrooms grouped together in 'cluster flats' sharing 103 communal kitchen facilities (developed under permission reference 97/2700). However, the cluster flats do not provide self-contained accommodation and could more appropriately be assessed on the same basis as student bedspaces, providing homes at a 2.5:1 ratio, ie 238 homes approx rather than 596. This would give a total of 335 existing homes, and a net increase as a result of the proposal of 1,585 new homes.
13. The existing housing on site would be redeveloped as part of Phase 3 of this application. The principle of the loss of this housing is accepted in the site allocation, and is supported by London Plan Policy H8, subject to identified housing needs being reprovided with equivalent or better quality housing. The cluster flats in particular are of poor quality, falling significantly short of current housing standards. Retention of existing poor quality housing would not be supported by policy, does not contribute to attracting or retaining staff at Northwick Hospital, and would preclude the redevelopment of the site at a greater density. Current and proposed arrangements for providing accommodation for NHS staff are discussed under 'Affordable housing and housing mix' below.

14. The redevelopment of the site is supported in principle by the Growth Area designation, subject to adequate contributions to the refurbishment / replacement of Northwick Park pavilion being secured and other material planning considerations.

#### Commercial and university uses

15. Brent's Policy DMP2 requires proposals involving 500sqm or more of gross retail floorspace outside of town centres that do not accord with the local plan to be accompanied by a retail impact assessment. This policy aims to ensure that the viability and vitality of town centre retail frontages is not compromised by competing facilities outside of town centres, in accordance with the principles set out in the NPPF. However, in this case the proposed Growth Area site allocation does allow for a small amount of commercial floorspace within the site. London Plan Policy S3 also supports new education facilities particularly where they facilitate the shared use of facilities and services within communities.
16. An additional 50,150sqm of university floorspace is proposed in Phase 4 of the development. In addition to student accommodation as noted above, this would include new academic facilities to support the expansion of the University, and new sports facilities which would allow existing University sports provision to be rationalised on one site. The sports facilities are intended to include a gym, fitness studios, sports hall, indoor courts and pitches, changing facilities and an external court / MUGA. Community and retail floorspace (including E(a), E(b), E(c), E(d), E(f) or F.2(b) uses, formerly D1, D2, A1, A2 and A3 uses) totalling 3,825sqm is also proposed and, given the scale of University development proposed, this quantum and mix of floorspace is considered appropriate to support the increased student population and academic activity on campus. A detailed breakdown of uses and proposed layouts of units would be secured under reserved matters.
17. It is understood that the University have also been in discussion with Brent's Parks Department regarding the use of Northwick Park playing fields for University sports activities, and this would be taken forward through the existing booking system for the use of facilities in the Park. The proposed University sports facilities could also be made available for use by the local community at certain times, and further details of the arrangements for this would be secured under a condition requiring a community access plan with use of the facilities secured at local authority rates.
18. The application would also deliver small scale retail floorspace (1,186sqm of E(a), E(b) or E(c) uses, formerly A1, A2 and A3 uses) to support the residential uses. The parameter plans show these being located in Block B1, which would be delivered as a mixed use building in Phase 2a of the development (or under the detailed application reference 20/0701) to accompany the construction of four residential blocks in Phase 1. The indicative details submitted show the commercial floorspace proposed in Phase 4 being in close proximity to Block B1 and together forming a 'hub' for the development overall. The combination of retail and community uses in close proximity across the two Phases would establish a focal point and meeting point for local residents, the academic community and other visitors to the area.
19. It is noted that small retail outlets are already available within the main Hospital buildings. However these primarily cater for visitors, staff and patients, and are not considered suitable to serve the day-to-day needs of local residents. They would continue to serve these groups within the Hospital, particularly for those arriving from Watford Road who would find it less convenient to visit the retail units in the development, and it is not considered that providing additional retail units to serve the new population would compromise their operation in any way.
20. In order to ensure that retail floorspace remains on a small scale to meet local needs, a restriction on individual units falling within use class A1/E(a) both within phases 2a and 4 exceeding 499sqm is proposed. Subject to this restriction the quantum of retail floorspace proposed is considered to be appropriate to serve the local needs of the new residential and academic community without attracting footfall away from Kenton Town Centre, and would be in accordance with the principles set out in the proposed site allocation. In order to guard against periods of vacancy leading to inactive frontages, a meanwhile use strategy is recommended to be required by condition. This would allow alternative uses of the units, such as community uses, to be considered on a temporary basis.

#### Reprovision of nursery

21. Brent's Core Strategy Policy CP23 seeks to retain existing community facilities, whilst social infrastructure in accessible locations is encouraged by draft Local Plan Policy BSI1 and London Plan

Policy S1.

22. The existing nursery on site consists of two single-storey portacabins with a total floorspace of 816sqm, and a grassed area of approx 600sqm providing external play space, located in between areas of car parking and adjacent to a substation. Temporary permissions have been granted on an ongoing basis for the nursery use, the most recent being granted in 2015 for a period of five years. Although there have been proposals made in the past to relocate nursery provision within the main Hospital buildings, the nursery is open to local residents as well as to Hospital staff. In 2019 the nursery was in use by 70 children (full-time equivalent), however numbers have been decreasing over the previous five-year period and the nursery has been consistently under-utilised, operating at approx 50% of its capacity of 140 children. The buildings would be demolished to facilitate the redevelopment of the site and there is no objection to this in principle, subject to adequate replacement provision being made and arrangements for temporary provision during the construction period.
23. All parents of 3 to 4 year olds are entitled to government funded childcare for 15 hours per week, whilst working parents and those on Universal Credit are (subject to other eligibility criteria) entitled to 30 hours per week of funded childcare. In some circumstances, parents of 2 year olds are also entitled to 15 hours per week of funded childcare. Parents may choose to access additional childcare provision at their own expense, and childcare providers take these factors into account in assessing the viability of new or expanded nursery provision. The Council has a duty to ensure that sufficient childcare is available to meet the demand for funded places.
24. However, Brent's Childcare Sufficiency Assessment 2018 indicates that there is currently a high volume of vacancies across the borough equating to a vacancy rate of 22% based on the total number of places for which providers are registered. Northwick Park ward is identified as having the lowest population of 3 and 4 year olds in the borough (246 in total), and an oversupply of nursery places representing 1.56 spaces per child in this age group. Take-up of free nursery provision for 3 and 4 year olds is low, comparable to other wards in Brent, at 52%, with the remaining children either in reception classes, not taking up a place or in childcare outside of Brent. These figures are generally consistent with the fall in demand at Northwick Park nursery. Further evidence of vacancy levels is provided in Chapter 6 of the ES, which finds five providers within 1km of the site (including the existing nursery on site and two in Harrow) which between them had 355 children on roll compared to 396 vacancies.
25. A number of other childcare providers operate in the surrounding area, including a nursery in Kenton half a mile away, and across the borough boundary in Harrow. However, future prospects for childcare providers are currently uncertain. The effects of Covid 19 are forecast to impact significantly on demand for nursery spaces for the foreseeable future. The immediate impact of the lockdown and other restrictions is reported to have led to the closure of many private providers, whilst the economic slowdown is expected to suppress demand for formal childcare, based on evidence from the 2008 recession, and the rapid growth in home-working and flexible hours could also contribute to falling demand in the longer term.
26. The proposed nursery would have a total floorspace of 447sqm, with 350sqm of external play space adjacent to the Park boundary, and would provide sufficient space for 90 children (full-time equivalent) in accordance with space standards set out by OFSTED. This would cater for the children registered as of 2019 and would provide some additional capacity to cater for new residents of the development. In terms of whether this capacity would be adequate, the GLA's population calculator estimates that, based on the indicative housing mix for this application, a residential population of 3,388 people (excluding students) would be expected including 2,739 adults and 307 under-fives. Additional demand from non-resident University staff and students might also result following the expansion of the university facilities.
27. Chapter 6 of the ES notes that the new nursery is not expected to meet the new demand generated by the development, but also highlights that this is a worst case assessment as some new residents may already be living locally and have secured nursery provision in the area. Based on the factors discussed above, and officers' discussions with Brent's Early Years team, it is considered that the proposed nursery is likely to be adequate to meet the demand from Phases 1 and 2a of the new development in addition to existing demand, bearing in mind the various factors contributing to generally low levels of demand for the foreseeable future.
28. If higher levels of demand are experienced as a result of the new development, it is anticipated that childcare providers would respond accordingly by proposing new or expanded facilities, which could

involve for example a change of use of one of the retail units in Phase 2a or a new development within the Hospital grounds or a proposal made under reserved matters within phase 4 of the outline application site. To assist in assessing the adequacy of nursery provision in Phases 3 and 4 of this application, updated assessments of current and forecast demand and supply for nursery places, based on the latest version of Brent's Childcare Sufficiency Assessment, would be required under reserved matters for these Phases, together with proposals for additional nursery provision should this be required.

29. To maintain continuity of provision during the construction phase, an application has recently been received, for a temporary nursery to be provided within University of Westminster campus grounds (in the vicinity of the existing nursery), (LPA Ref: 21/0553) and is under consideration.

#### Provision of other community uses

30. As referenced above, Policy CP23 requires 350sqm new community floorspace per 1,000 new population. However it is noted that emerging Policy BS11 is less prescriptive and that neither this Policy nor the draft Growth Area site allocation requires new community floorspace in addition to the replacement or upgrading of Northwick Park pavilion. Whilst there is no explicit commitment to provide community floorspace within this application, as noted above E(d), E(f) or F.2(b) (formerly D1 and D2) community uses could come forward as part of Phase 4.
31. The pavilion is well used in terms of sporting facilities but not in terms of wider community facilities, the main hall and bar area being outdated, unattractive and no longer fit for purpose. Reproviding the pavilion as part of a new mixed use building on the part of the site owned by Brent Council was discussed with officers during the pre-application process. However, this area is designated Metropolitan Open Land, and it was considered that a larger building that might include a number of other uses unrelated to the recreational use of the park could potentially be inappropriate development. Furthermore, although the relocation of the pavilion facilities could encourage users to travel by public transport, it could also be inconvenient due to its location a long distance from some of the playing fields, and could disadvantage any users who are reliant on car transport. Relocation or replacement of the pavilion does not form part of this application.
32. Refurbishment of the pavilion to create a new venue providing state of the art facilities for a variety of sports and community uses is estimated to cost in the region of £1.5m. This refurbishment would also provide benefits to existing local communities and would help to improve the energy efficiency of the building, and additional funding could therefore be sought from other income streams such as the Community Infrastructure Levy. A substantial financial contribution of £750,000 across the three residential Phases (1, 2a and 3) would be secured towards its refurbishment or replacement in its existing location. This would be in keeping with pre-application consultations with local communities, which revealed significant support for retaining the pavilion in its current location.
33. The applicants have undertaken a review of local community space using Brent's online directory, 'Spacebook'. This has identified nine other community meeting, training and event spaces available within 3km of the site, including Kenton Hall, which has capacity to seat 300 people and is 1.4km to the east. These provide a range of venues for community activities which, together with the refurbished pavilion, would partly mitigate the lack of community floorspace provided on site, particularly during the early stages of establishing a new community.
34. However, demand for community floorspace on site may emerge at a later stage, and it is proposed that a detailed assessment of such demand, including data from surveys of new residents and together with proposals to include such floorspace within the site (proposal made under reserved matters within phase 4 of the outline application site) or within the vicinity if required, should be required under reserved matters for Phase 3.

#### Impact on Metropolitan Open Land and designated open space

35. Metropolitan Open Land is designated under London Plan Policy G3. This designation seeks to retain London's network of multi-functional green infrastructure and conveys the same protection against inappropriate development given to Green Belt land in the NPPF 2019. The key policy tests for assessing the impact of development proposals are the same as those for the Green Belt, which are set out in the NPPF 2019 paragraphs 143 to 147. These paragraphs refer to development on Green Belt but not to development on land adjoining it, and their overall aim is to retain the openness and permanence of the Green Belt rather than, for example, to protect wider views and landscape settings.

The NPPF also encourages local authorities to plan positively to enhance the beneficial use of these areas, such as looking for opportunities to provide access and opportunities for outdoor sport and recreation; or to retain and enhance landscapes, visual amenity and biodiversity. London Plan Policy G3 also encourages boroughs to enhance the quality and range of uses of Metropolitan Open Land.

36. Brent's Policy CP18 offers a lower level of protection for open space of local value and seeks to enhance their recreational and amenity value. Emerging Policies DMP1 and BGI1 carry forward these aims. The proposed Growth Area site allocation notes that the Growth Area contains several areas of protected open space, and accepts that these could be disaggregated and dispersed more widely throughout the area as it is redeveloped.
37. As noted above, the triangle of land within Brent Council's ownership forms part of Northwick Park and is designated Metropolitan Open Land. This area is currently grassed, with tree cover along part of the eastern boundary and a footpath on the western boundary. It links the rest of the site to the entrance to Northwick Park station, which consists of an underpass beneath the railway tracks, and the area immediately outside the underpass is paved and includes some Sheffield cycle stands.
38. The proposal would introduce new paving to create a pedestrian route through and around the triangle, new planting borders, new trees and play equipment. The proposal is indicative at this stage, and a detailed landscaping scheme would be required under reserved matters, in consultation with Brent's Parks Department. However, the indicative details demonstrate that the proposal would enhance the attractiveness of this area, would encourage its use for play, recreation and enjoyment of open space, and would create a greater sense of arrival for visitors from the station. It is considered that this would represent an appropriate form of development on Metropolitan Open Land. These works would come forward as Phase 2b of the application.
39. The Brent triangle is also open space protected by Policy CP18 (3,200sqm in area), as are the green space in the University parcel of land (approximately two hectares in area) and a small area of grassed embankment on the eastern edge of the surface level car parks (2,900sqm in area). However, access to the University land is restricted by a gated entrance and fenced perimeter, and is only available for users of the University. The grassed embankment is largely inaccessible to the public due to its steep gradient, dense scrub and overgrown vegetation, and does not provide any sports or play equipment or other features to enhance its amenity value. The function of these spaces is not clear and, due to their location, physical features and close proximity to similar grassed areas in Northwick Park, they do not invite public use.
40. The proposed Parameter Landscape Plan shows a variety of public open spaces between and around proposed buildings, in addition to communal amenity space for residents, the street network and enhanced boundary tree planting. The total area shown is approx 28,671sqm (excluding the existing public footpath PROW100 and the Watford Road frontage), which is considered sufficient in both area and quality to mitigate the the loss of the existing 23,100sqm of designated open space. Within this, the Brent triangle would be retained but with new landscaping, pedestrianised areas and play facilities, whilst 4,767sqm of the total would be provided on the detailed application site (reference 20/0701) primarily in the form of a linear park and rain garden running alongside the main street and a neighbourhood square. Further details of proposed landscaping would be required under reserved matters for each Phase.

#### Specialist housing needs

41. Brent's emerging Policy BH3 seeks the provision of Build to Rent housing in growth areas and large developments, in order to encourage increased housing delivery and provide a wider choice of housing within Brent. In this case the developable parts of the application site are owned by the University of Westminster or by Network Homes, a registered provider of affordable housing, and this proposal for new housing including student accommodation has come forward without requiring the policy stimulus to provide Build to Rent housing. The proposed mix of tenures across the site (including student accommodation) is considered to provide an adequate range of housing types to suit the location.
42. London Plan Policy H13 and Brent's emerging Policy BH8 also support the provision of specialist older people's housing, particularly in Growth Areas. This is housing that does not provide an element of care but is designed and managed for older people, and where care is provided or available. This site could be particularly suitable for older persons, given its immediate proximity to the hospital, park and underground station. Whilst no immediate need for this type of housing has been identified in the area, it is recommended that an assessment of the specific local need for this form of accommodation is

provided as part of reserved matters and that appropriate proposals for such accommodation are made at that stage.

#### Loss of existing non-residential uses on site

43. The proposal would lead to the loss of 842 existing parking spaces for Northwick Park Hospital staff, as follows:
  - 148 spaces located along the northern section of the Hospital ring road, to accommodate highway works to create a two-way spine road;
  - 594 spaces located in the surface level parking areas on the site.
44. Parking for the hospital would be reprovided in a new multi-storey car park and energy centre providing 697 spaces within the retained hospital site (this is the subject of a separate application on behalf of the NHS Trust, reference 19/4272, which was granted permission on 20 May 2020). The provision of this parking prior to redevelopment of the detailed application site would be secured through the s106 agreement, and the Car Park Management Plan for that application states that the use of these existing parking areas would cease from 1 March 2021.
45. A further application for the energy centre plant and equipment was approved on 28/01/2021 (reference 20/3152), and this would allow for the installation of new facilities to enable the decommissioning of the boiler house. Subject to the completion and operation of these replacement facilities being secured through the s106 agreement, there is no objection to the loss of surface level car parks and the boiler house.
46. The number of parking spaces available to the Hospital would be reduced, however notwithstanding neighbour objections on this point, this was considered in the determination of application reference 19/4272 to be acceptable and would occur in any case regardless of the outcome of this application. Wider parking impacts of this development are considered in the Transport Considerations section of this report.
47. The staff social club is not proposed to be reprovided as the Trust no longer wishes to support social facilities involving consumption of alcohol. Brent's Policy CP23 seeks to retain existing community facilities, however emerging Policy BS11 provides a set of criteria to assess any loss of existing facilities. The proposal is considered to comply with emerging policy as the building is specifically for the use of NHS staff and therefore its loss would not be detrimental to the wider community in terms of the availability of such facilities. Furthermore, dedicated social facilities for NHS staff could if required be provided within the retained Hospital grounds. The building is dated, offers poor quality accommodation and is in a poor state of repair, and there are no objections in principle to its demolition.
48. A string of single-storey temporary buildings known as T & TT block have previously been used as a nursing school and currently house occupational health staff of the Hospital (two employees). However, these buildings are of small scale and poor quality, and staff relocation within the main Hospital buildings would take place prior to demolition of the buildings. There is no objection to the loss of these facilities.

#### Access arrangements

49. Access arrangements and associated highway works, which are identical to those approved under reference 20/0677, also form part of this application. These would also deliver wider benefits in terms of improved access to Northwick Park Hospital and the University campus, and an improved environment for pedestrians and cyclists, and are discussed further under 'Transport Considerations' below. Completion of access arrangements to adoptable standards would be required prior to occupation or use of the development, and secured through the s106 agreement.

#### Wider impacts of the development

50. The proposal would facilitate a significant expansion of the University of Westminster Harrow Campus and would provide improved access arrangements for both the University and Northwick Park Hospital. Both the University and the NHS Trust have submitted comments in support of the application, and the Trust have confirmed that it would not prejudice future plans for improvements to hospital services.

51. The socio-economic impacts of the development are assessed in Chapter 6 of the ES. This considers factors such as construction employment, construction worker spending in the local area, local spending by residents and students, and the contribution to Brent's housing targets. Construction jobs are estimated to number 635 full-time equivalent jobs per year, the construction workforce spending £7.8m locally over the construction period. Once completed, the proposed development is estimated to support 440 new full-time equivalent jobs. The new residential population is forecast to be 3,388 people in total, in addition to 800 students. Workers, residents and students are estimated to generate local residential expenditure per year of £261,770, £25.3m and £3.9m respectively.
52. This chapter also reviews existing school provision in the area. Nearby primary schools currently have spare capacity for 826 pupils from reception through to Year 6, and this capacity increases over the next 5 years to a capacity of 1,071 in 2024/2025. This is due to a previous surge in capacities now removed from the primary schooling phase. In terms of secondary school places, there is currently capacity for an extra 1,182 pupils. This increases to 1,610 to 2024/25 but predominantly within secondary school planning area 3 (southwest). Although the need for an additional 10 forms by 2023/24 has been identified, expansions in capacity across the borough are planned in response to this. There is a shortage of dedicated play space in the Northwick Park ward, although the site would be within 400m of an existing play space in the Park and so would meet the standard for access to play space. New play space would also be provided within the development, which represents a minor beneficial effect.
53. The NHS local CCG have been consulted and have confirmed that the proposal would not compromise any future redevelopment of the Hospital site, and that GP provision in the immediate area is currently well supported whereas CIL funding is likely to be sought towards improvements within the Hospital.
54. The impacts of climate change were also considered. The adverse effect of increases in heat-related illnesses, drought, and decreased water and food security would be partially offset against a reduced risk of cold-weather related illness, but in general the shift towards more extreme weather patterns would tend to magnify the increased demand for GP services created by an increased population. However, these effects are uncertain at this stage and would occur in any case as a result of increases in population coupled with changing weather patterns.

### Conclusion

55. The proposal would respond well to the aims of the proposed Growth Area site allocation. It would make a very significant contribution to Brent's housing targets and would facilitate a substantial expansion in the University of Westminster Harrow Campus that would in turn provide new sporting and leisure facilities that could also be made available for local community use. A replacement nursery would be provided, with capacity to cater for additional demand from the development, together with small scale commercial and community uses to serve local needs and support the increased student population.
56. The loss of existing housing would be more than compensated for by the provision of new higher quality housing at a greater density, and the loss of other existing uses on site is considered to be acceptable in this instance. A contribution to the refurbishment and upgrading of Northwick Park Pavilion would be secured to allow this venue to provide significantly enhanced facilities for local residents, sporting groups and the new communities on site. The proposal is considered to be acceptable in principle, subject to other material planning considerations discussed below.

### **Affordable housing and housing mix**

#### Policy background

57. Brent's adopted local Policies CP2 and DMP15 set out the requirements for major applications in respect of affordable housing provision, and stipulate that schemes should provide 50% of homes as affordable, with 70% of those affordable homes being social or affordable rented housing and 30% of those affordable homes being intermediate housing (such as for shared ownership or intermediate rent). The policy also allows for a reduction in affordable housing obligations on economic viability grounds where it can be robustly demonstrated that such a provision of affordable housing would undermine the deliverability of the scheme. The policy requires schemes to deliver the maximum reasonable proportion of Affordable Housing (i.e. the most that the scheme can viably deliver, up to the target). It does not require all schemes to deliver 50% Affordable Housing.



58. The definition within DMP15 allows for affordable rented housing (defined as housing which is rented at least 20% below the market value) to be an acceptable form of low cost rented housing, which is consistent with the NPPF definition of affordable housing.
59. London Plan affordable housing policy (Policies H4, H5 and H6) sets out the Mayor's commitment to delivering 'genuinely affordable' housing and requires the following split of affordable housing provision to be applied to development proposals: a minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent or London Affordable Rent); a minimum of 30% intermediate products; 40% to be determined by the borough based on identified need.
60. Brent's emerging Local Plan policy (BH5) is similar to DMP15 in the adopted plan, but sets a strategic target of 50% affordable housing while supporting the Mayor of London's Threshold Approach to applications (emerging Policy H5), with schemes not viability tested at application stage if they deliver at least 35% (or 50% on public sector land / industrial land) and propose a policy-compliant tenure split. Brent draft Policy BH5 sets a target of 70% of those affordable homes being for social rent or London Affordable Rent and the remaining 30% being for intermediate products. This split marries up with the draft London Plan Policy H6 by design, with Brent having considered that the 40% based on borough need should fall within the low cost rented homes category, bringing Brent's target split across both emerging policies as 70% for low cost rented homes (social rent or London Affordable Rent) and 30% for intermediate products.
61. Brent's draft Local Plan has only recently been examined by the Planning Inspectorate and as such the adopted Policy DMP15 would carry considerably more weight than the emerging policy at present. The policy requirements can be summarised as follows:

Policy context	Status	% Affordable Housing required	Tenure split		
Existing adopted policy	Adopted	Maximum reasonable proportion	70% Affordable Rent (to 80 % Market)	30% Intermediate	
London Plan	Adopted	Maximum reasonable proportion	30% Social / London Affordable Rent	30% Intermediate	40% determined by borough
Emerging Local Plan	Limited weight	Maximum reasonable proportion	70% Social / London Affordable Rent	30% Intermediate	

#### Reprovision of existing affordable housing

62. London Plan Policy H8 requires existing affordable housing to be replaced with at least equivalent affordable housing floorspace, including staff accommodation to meet an identified need. Policy H8 requires existing social rent housing to be replaced as social rent or London Affordable Rent but does not specify any requirements in relation to other existing tenures.
63. Of the existing housing on site, 26 homes (comprising 11 x 1bed, 13 x 2bed and 2 x 3bed flats, developed under reference 09/2246) are subject to a s106 agreement that requires them to be let at intermediate rent levels (ie above social rents but below market rents) although not specifically to NHS keyworkers. Information supplied by Network Homes confirms that 12 x 2bed flats are currently let to NHS staff with rent paid via payroll deductions, however no information is available on the employment status of other tenants.
64. The remainder of the existing housing (developed under reference 97/2700) consists mainly of 'cluster flats', ie groups of single ensuite bedrooms sharing communal kitchen facilities (596 bedrooms in total sharing 103 kitchens, in addition to 32 x 1bed flats, and 22 x 2bed and 17 x 3bed houses). Of the ensuite bedrooms, 60 were originally identified as being serviced units for the use of doctors on call, with daily cleaning and hotel services provided. This housing is also subject to a s106 agreement securing nomination rights for the NHS Trust. Under the terms of this agreement the Trust initially held 375 units including 281 of the ensuite bedrooms but has been able to vary the number of units it uses by up to 10% per year, and to vary this down to zero from March 2023. Rent levels were set out in the

s106 and were subject to controls on rent increases, however these controls were set to lapse on 31 March 2008, after which market rents could be charged.

65. Currently, these older units are let at market rents or discounts of less than 20% of market rent. Of these, 84 of the ensuite bedrooms, seven of the 2bed houses and 9 of the 3bed houses are currently let to NHS staff (in addition to 17 bedrooms provided as serviced units). A further 113 of the ensuite bedrooms are bulk let by Network Homes to partner organisations, including for short stay training accommodation.
66. Network Homes have confirmed that NHS staff resident on the site currently comprise 84 residents of cluster rooms (bedsits), twelve residents of 2bed flats, seven residents of 2bed houses and nine residents of 3bed houses. Existing residents with intermediate rent tenancies would be eligible for rehousing within the intermediate rent element of the scheme, and have been offered one-to-one meetings and advice on the housing options that would be available within the development, and no existing tenants would be affected until 2023 at the earliest. The NHS Trust would have first right of refusal over intermediate rent accommodation on the site and would continue to be able to nominate staff who would benefit from this type of accommodation. A local lettings plan to enable existing residents working for the Trust to have priority for new homes where they are eligible is also proposed. These matters would be secured through the s106 agreement.
67. The loss of existing housing is considered to be acceptable in principle subject to the provision of at least 26 affordable units (with at least 43 bedrooms) to comply with Policy H8, in addition to new affordable housing provision.

#### Non-residential elements of scheme

68. The proposals for the university site are still at an early stage, and so have not been included in the viability appraisal for this application. This is considered to be acceptable, as this part of the site is in separate ownership and would come forward separately and as a largely self-contained development which can be viability tested separately.
69. London Plan Policy H15 requires a proportion of all new purpose built student housing (PBSA) to be provided at affordable rent levels. This policy is similar to Policy H5 in that it offers a fast track route where at least 35% of the student accommodation is proposed at affordable rent levels but requires viability testing where a lower proportion is proposed.
70. Further details of affordable housing for this phase, including a viability appraisal to capture the values and costs associated with the development in this phase if required under Policy H5, would be secured through the s106 agreement.
71. The access arrangements and highway works proposed as part of this application would be financed through a grant from the government's Housing Infrastructure Fund, whilst the landscaping proposed for the Brent triangle of land would also be subject to separate funding arrangements. These elements of the application have also not been included in the applicant's viability appraisal, which relates only to the residential element of the proposal.

#### Summary of residential housing mix

72. The application has been submitted on the basis that it would provide 40% affordable housing by habitable room, which would indicatively comprise 587 affordable units in the following tenures:

<b>London Affordable Rent</b>	155 units	10% by unit, 12.8% by habitable room	including 122 x 3bed/4bed units
<b>Intermediate Rent</b>	104 units	7% by unit, 7.8% by habitable room	
<b>London Living Rent</b>	68 units	4% by unit, 3.9% by habitable room	including 20 x 4bed units
<b>Shared ownership</b>	260 units	17% by unit, 15.6% by habitable room	including 4 x 3bed units
<b>Total affordable</b>	587 units	38% by unit, 40.1% by habitable room	

<b>Market housing</b>	942 units	62% by unit	
<b>Total</b>	<b>1,529 units</b>		

73. The total of 1,529 units is less than the 1,600 maximum number of units applied for within the outline application, but assumes that the whole of the outline site would be developed in a similar way as the detailed application.
74. The financial viability appraisal for the application establishes a benchmark land value (BLV) of £84.8m, based on the Existing Use Value of the site plus a premium, and shows that the scheme results in a loss (ie a negative profit) of 13.02% of Gross Development Value (GDV) on a nil grant basis. The applicant has taken a view that the deficit can be eroded over the life of the development. Sensitivity testing is included in the appraisal, to analyse the effects of changes in costs and residential sales values by 5% or 10%, and to assess the impact of securing grant funding. This exercise demonstrates that grant funding in itself does not make the scheme viable, but that a combination of grant funding together with increased values or reduced costs could potentially convert the deficit into a surplus. In this instance, the uplift in viability would be captured within the mid- and/or late-stage review mechanisms.
75. In terms of tenure mix, the 155 London Affordable Rent units would be considered to be genuinely affordable whereas the other tenures would all be classified as intermediate products. The tenure split would be 32 : 68 in favour of intermediate units (by habitable room, or 26.4 : 73.6 by unit), which does not comply with Brent's preferred tenure split of 70 : 30 in favour of Affordable rent products. The introduction of London Affordable Rent and the emphasis on this specific tenure in Brent's emerging Policy BH5, are intended to address this concern about affordability, and the inclusion of London Affordable Rent units is therefore welcomed.

#### Council's review of proposal

76. The FVA was reviewed on behalf of the Council by BNP Paribas. They established a lower BLV of £61.97m approx, but also concluded that in all the scenarios tested, the scheme was in a financial deficit and that the proposed affordable housing offer represents beyond the maximum reasonable amount that the scheme could viably deliver at this time. Grant funding would reduce but not eliminate the deficit, as demonstrated in the table below:

Grant funding?	Residual Land Value	Benchmark Land Value	Surplus / deficit
No	- £3.40m	£61.97m	- £65.37m
Yes	£13.17m	£61.97m	- £48.80m

77. The applicants have agreed to the reduced BLV of £61.97m, and this and other agreed key assumptions would be secured through the s106 agreement.
78. Further sensitivity testing was carried out to assess the maximum amount of Affordable Housing that the scheme could viably provide on a policy compliant basis (i.e. the 70:30 ratio of London Affordable rent to Intermediate). This exercise demonstrated that a wholly private scheme (i.e. zero Affordable housing) would result in an overall deficit of approx £6.12m when measured against the benchmark land value of £61.97m. Whilst this is a relatively small deficit in the context of a scheme of this scale, it does demonstrate that the scheme can not viably deliver any Affordable homes taking into account reasonable expectations for profit. The applicant has chosen to accept a lower level of profit in order to provide the Affordable Rented and intermediate homes that are proposed. Therefore, while the Affordable Housing tenure split is not in line with the 70:30 ratio set out in policy, the proposal includes more London Affordable Rented homes than are required by policy, and the proposal is in full accordance with the Council's and Mayor's adopted and emerging policies regarding the provision of Affordable housing.
79. Given the scale of the scheme and the overall delivery time, further reviews would be necessary to capture any potential growth, and these would be secured through the s106 agreement. It is proposed that site-wide mid-stage viability appraisals should be required at three stages in the development of

the site: prior to occupation of 70% of units in Phase 1, and again prior to occupation of 70% of the units in Phase 2a and prior to commencement of Phase 3. The appraisals would be required to include proposals for enhanced on-site affordable housing provision, which could be provided as a combination of additional units and of increasing the affordability of the affordable units already secured (ie converting them to a more affordable tenure), in order to capture any surplus identified. A late stage review would then be required prior to occupation of 70% of the units in Phase 3, with any surplus identified being secured as a financial contribution towards affordable housing in the borough.

80. It is important to note that Phases 1 and 2a could be implemented independently of this application under the detailed planning application reference 20/0701 (should that application be granted permission). This would deliver 70 London Affordable Rent homes in addition to 26 at London Living Rent levels, 38 at rent levels not exceeding 80% of market rent, and 111 for Shared Ownership. In this case, the first two reviews discussed above would fall away, and corresponding review mechanisms relating to the detailed application would come into force. The two applications would be linked via s106 agreements to ensure that these obligations are captured appropriately.

### Housing mix

81. The housing mix proposed is indicative at this stage and includes 509 x 1bed or studio units, 766 x 2bed units, 226 x 3bed units and 28 x 4bed units (16.61% family sized units). Whilst this does not comply with the 25% target for family-sized dwellings set out in Policy CP2 and draft Local Plan Policy BH6 (which also carries some weight) and allows for exceptions to the 25% target. In this context it is noted that the London Affordable Rent units would be weighted more heavily towards family-sized units, to meet a specific Brent need for this type of housing (although a detailed breakdown is not available at this stage, it is noted that the percentage in this tenure is markedly higher when calculated by habitable room rather than unit, which indicates a higher proportion of larger units). It is considered that providing a greater proportion of family sized units would further compromise the viability of the scheme and hence the delivery of affordable housing, potentially undermining the delivery of Affordable homes within the scheme and the achievement of the Growth Area aims. The housing mix is considered to be appropriate in this context.

### **Relationship with surrounding area**

#### Relationship with Northwick Park Metropolitan Open Land and Capital Ring

82. London Plan Policy G3 affords Metropolitan Open Land the same level of protection as Green Belt. The key policy tests for assessing the impact of development proposals are the same as those for the Green Belt, which are set out in the NPPF 2019 paragraphs 143 to 147. These paragraphs refer to development on Green Belt but not to development on land adjoining it, and their overall aim is to retain the openness and permanence of the Green Belt rather than, for example, to protect wider views and landscape settings. The NPPF also encourages local authorities to plan positively to enhance their beneficial use, such as looking for opportunities to provide access and opportunities for outdoor sport and recreation; or to retain and enhance landscapes, visual amenity and biodiversity. London Plan Policy G3 also encourages boroughs to enhance the quality and range of uses of Metropolitan Open Land.
83. As noted above, the part of the site in Brent Council's ownership is designated Metropolitan Open Land, as is Northwick Park itself and the golf course to the south. This area generally has an open aspect and visually forms part of the open expanse of the Park, and the proposed landscaping works would not compromise the openness or permanence of the Park as Metropolitan Open Land.
84. The Park itself is a grassed area of level ground, with mature trees within it and around its boundaries, and includes the Pavilion as noted above, together with associated car parking and a children's play area, all located near to the south-eastern corner of the site. The Park does not have any notable landscape features but is widely used for outdoor sports including cricket, football and Gaelic football for various age groups and is also popular with dog walkers. The park edge is characterised by a belt of mature trees and understory vegetation, both within and outside the site boundary, and a small brook or wet ditch running along this tree belt outside of the boundary. There is one entrance into the park from the site, from the area of car parking to the south of the existing nursery, which consists of a break in the tree belt and a concrete path laid over the brook.
85. Given the importance of the Park for local sports, a Cricket Boundary Assessment was submitted with the application, and concludes that, given the distances of the proposed buildings from the cricket pitch

in the Park, the likelihood of balls from community level and amateur matches entering the site would be very rare. Sport England have been consulted on the proposal and have confirmed that the proposed development meets Exception 3 of their playing fields policy, in that it affects only land incapable of forming part of a playing pitch and does not reduce the size of any playing pitch, result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas), reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality, result in the loss of other sporting provision or ancillary facilities on the site, or prejudice the use of any remaining areas of playing field on the site. Sport England have raised no objection in their role as a statutory consultee. As a non-statutory consultee, they encourage the use of CIL funding to deliver new and improved facilities for sport to meet the sporting needs arising from the development as well as those identified in Brent's Infrastructure Delivery Plan. It is not considered that the proposal would compromise the use of the Park for sports and recreation, indeed by contributing to the upgrade of the pavilion it would help to facilitate such use.

86. In terms of the openness of the Park, this would be affected by the development given the proposed height and massing. The existing buildings and structures on site and within the hospital grounds, including the 39m high boiler house chimney, are visible from the Park and have some impact on openness. In comparison, the proposed development would be a more prominent new feature of the skyline from views within the Park. However, the building heights would step down towards the Park in order to reduce the impact of height, and the mature tree cover along the site boundary, together with the proposed new landscaping and tree planting along this boundary, would continue to soften the visual impact.
87. Whilst the height and massing of the proposed buildings would be greater than existing, the design quality and appearance of the built form would also be greatly enhanced compared to the existing site. The proposal would also provide enhanced pedestrian access into the Park from two points, which could encourage existing and proposed residents, hospital staff and patients, and university staff and students to utilise it more widely. The financial contribution to the Pavilion, as noted above, would enhance the ability of this building to support sports and other uses. Overall, the proposal is considered to offer benefits in terms of the functionality and enjoyment of the Metropolitan Open Land that would outweigh the very limited amount of harm to its openness.
88. The Capital Ring is a circular walking route around London, linking up public footpaths and areas of open space, is part of the Walk London Network protected by London Plan Policy S5, and is also protected by Brent's Policy DMP10. These policies seek to retain the network and, where possible, to enhance it and promote its use. The footpath to the south of the hospital site and the application site (and to the north of the golf course) is part of the Capital Ring and, where this reaches the Park at the south-eastern boundary of the outline application site, the Capital Ring continues southwards through the Park and along its southern boundary as PROW38.
89. The southern boundary of the site is adjacent to the Capital Ring and the existing buildings on site are built up to within 3m of the boundary. The parameter plans indicate that the proposed buildings would be at least 7m from this boundary and that the boundary would be enhanced by additional planting that would contribute to the verdant tree-lined character of the footpath.

#### Relationship with MOD safeguarding zone

90. The Ministry of Defence (MOD) were consulted, as the site occupies the statutory Technical, Height and Birdstrike safeguarding zones surrounding the RAF Northolt aerodrome. The MOD have confirmed that there are no objections in terms of technical or height safeguarding. Within the Birdstrike statutory safeguarding zone, the MOD's principal concern is the creation of new habitats that may attract and support populations of large and / or flocking birds close to the aerodrome. Green and blue roofs on the residential blocks have the potential to attract and support large and flocking hazardous birds, in particular breeding large gulls.
91. A Bird Hazard Management Plan is required by condition to prevent successful breeding of hazardous birds. This should demonstrate that: the site will not contain large areas of open water, waste storage areas for food outlets will be managed so as to avoid the availability of food waste for hazardous birds; and roof areas will be netted if other measures to prevent nesting of hazardous birds are unsuccessful.

#### Heritage, townscape and visual impacts

92. The NPPF sets out that where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.
93. A number of heritage assets are located within the wider surrounding area. Most significant is the settlement of Harrow-on-the-Hill, which is approx 1km to the west, has a long and well-documented history and contains eight contiguous conservation areas including Harrow Park (a registered Grade II heritage asset on Historic England's Historic Parks and Gardens Register), with approx 80 listed buildings together with a number of locally listed buildings. The Parish Church of St Mary's Church is Grade I listed, and a group of Harrow School buildings are Grade II\* listed. There are several other listed buildings in Harrow Town Centre to the northwest of the site.
94. Two conservation areas within Brent are nearby. Sudbury Court Conservation Area is to the south of the Park, bordering Watford Road and approx 300m distant from the site. Northwick Circle Conservation Area is to the northeast of the site beyond the railway tracks, approx 400m from the site. There are two listed buildings in Brent within 1km of the site - St Mary's Parish Church at Kenton and the Windermere public house at South Kenton. Northwick Park itself is locally listed, in recognition of its historic associations as part of the original Northwick Park Estate. Brent's conservation officer considers that the significance of the Park as a non-designated heritage asset has already been compromised by development on the Hospital and University sites. However, it provides visual amenity as a source of longer distance views. The surrounding areas in general are mostly characterised by early twentieth century housing, other than Harrow Town Centre which has a more mixed character, and Harrow-on-the-Hill.
95. A Heritage, Townscape and Visual Impact Assessment was submitted as Volume 2 of the ES and considers the visual impact of the completed development on townscape character areas, on heritage assets including conservation areas, listed buildings and registered parks and gardens of special historic interest, and on visual amenity provided by views, all within a 1km radius. Some longer distance viewpoints were also considered. Sixteen representative views (RVs) were identified, including public viewpoints, public highways and rights of way, townscape and transport nodes, heritage features, open spaces, concentrations of residential properties nearby, places of employment and other sensitive receptors. The extent to which the development would be visible in each view was then assessed, together with the value of that view. The representative views are discussed in the following paragraphs.
96. Northwick Park Underground Station platform. This view has low value, is not related to any heritage assets and has little visual amenity importance. The boiler house chimney provides the focal point in the existing view, and some Hospital and University buildings are just visible above and beside the tree cover. The development would be very prominent in this view, with the upper floors of blocks along the Park edge, the taller element of the marker block and the nearest of the University buildings being visible. However, while the bulk of built form visible would be greater than in the existing view, the bulk would be broken up by the varying building heights and architectural detailing of the scheme. Overall, the effect is considered to be significant but to be beneficial due to the improved quality of the architectural forms.
97. RV2: Northwick Avenue at emergency access route leading to northern entrance to Underground Station. This view is along the access road between two-storey semi-detached houses. The elevated railway tracks in the far middle distance prevent any views of the Park or the site. The upper floors of the nearest of the University buildings would be visible in the background behind the railway tracks. However the Design Code sets out that the buildings should have a simple uncluttered roof line and whilst the proposal would have a moderate to minor impact, this is not considered to be a sensitive view and the impact would not be significant.
98. RV3: Conway Gardens Footbridge. This is a pedestrian footbridge over the railway tracks on the eastern boundary of the Park with Conway Gardens. It provides a raised vantage point of views west over Northwick Park, and illustrates the open character of the Park, tree cover marking its boundary with the site. In the far distance, taller buildings within the Hospital and University grounds are visible and beyond these a limited view of the spire of the Church of St Mary is just visible above the Hospital roof. The proposed development would be visible above the existing buildings, due to its being closer to the viewpoint, with building heights gradually increasing to the north of the view. The Church spire is

only visible due to the viewpoint being elevated, and so would not be visible from other viewpoints along this boundary or from other points within the Park which do not have an elevated view. This view would be read in conjunction with the Hospital buildings and would have a significant but beneficial effect.

99. RV4: Northwick Park (southeast corner): This view is on the public footpath PROW38, and again shows the open, unbuilt, character of the Park. In the background, Northwick Park Pavilion is visible to the northwest, and the taller buildings of the Hospital and the boiler house chimney behind the tree line. The proposed development would be visible in the middle ground, but would be read in conjunction with the existing Hospital buildings, and would have a moderate but beneficial effect on this view.
100. RV5: Northwick Park (southern boundary): This view is also on PROW38 but from the south of the Park. The tree cover on the site boundary is visible in the far middle ground and the taller Hospital buildings beyond that. Existing housing on the outline site can be glimpsed through the trees. The proposed development would be visible in the background of this view, but would be read in conjunction with existing Hospital buildings and would appear of a similar height and bulk. The effect would be moderate and beneficial.
101. RV6: Watford Road: This view is taken from the southwest of the site, opposite the access to the golf course in Northwick Park. This view has a low value, and is cluttered by street furniture in the foreground. The development would be screened by existing tree and vegetation cover during summer but would be visible in the background in winter. This effect would be moderate to minor and beneficial.
102. RV7: Northwick Park roundabout (northwestern corner): This view is dominated by the roundabout, with some tree cover and the top of the existing twelve-storey University building visible in the distance. The upper floors of Block E1 would be glimpsed in the background and, given the low sensitivity of this view, it is considered that this would be a minor and neutral effect.
103. RV8: Harrow School Playing Field. This view is located at the junction of two public rights of way, looking east towards Watford Road. The fore and middle ground is open across the playing field, lined with dense hedgerow and mature trees, with existing Hospital and University buildings visible beyond this. This view has a medium value given its local scenic value. The top stories of the proposed buildings would be glimpsed in the background of this view, and would be read in conjunction with the existing buildings. This would have a moderate to minor and beneficial effect.
104. RV9: Music Hill: This view is from the eastern end of Music Hill, a steep footpath leading downhill through Harrow School and forming part of the Capital Ring network. The foreground of the view is dominated by the car park associated with the school playing fields, which are visible in the middle ground, with tree and vegetation cover along the boundary with Watford Road in the distance. This view has a medium to low value, reflecting its local scenic value. The proposed development would be glimpsed in the background of the view although behind existing tree cover, and the effect would be minor and beneficial.
105. RV10: Harrow School Farm's Fields: This view is taken from the lower slopes of Harrow-on-the-Hill, outside of the conservation area but on a public right of way. This view illustrates the open character of the fields, although the taller buildings of the University and Hospital are visible in the background. The proposed buildings would be read in conjunction with the existing Hospital buildings in the background of this view, and the effect would be moderate to minor and beneficial.
106. RV11: Church Hill: This is a view from close to the Grade I listed St Mary's Church in Harrow. This provides a raised vantage point close to the top of the hill, looking down on Grade II listed buildings associated with Harrow School, with glimpses of Kenton and Edgware in the background. This view has a high to medium value, as a scenic view containing a number of designated heritage assets, but is not identified as a key view in the Harrow on the Hill Conservation Areas SPD 2008 or in Harrow Council's Development Management Policies 2013. The proposed buildings would be screened by the intervening built form in the middle ground, and would have no effect on this view.
107. RV12: Harrow School: This view is looking northeast, on the High Street between Harrow School Chapel and Vaughan Library. The lawn in the foreground is not in the public realm, and this viewpoint offers only a glimpsed view of Kenton and Edgware in the far background, with glimpses of the Hospital building also in the background. A limited view of the top floors of the taller marker building and the southern buildings in the development would be available, but would be read with the existing

tall building and would not extend above the glimpsed horizon. The effect would be moderate and neutral.

108. RV13: Abbots Drive: This view is from the south, within Sudbury Court Conservation Area, along Audrey Gardens towards the Park boundary. The conservation area is characterised by Arts and Crafts influenced housing in large garden plots, with long roads such as Audrey Gardens providing significant views. Block D6 of the proposed development would be glimpsed in the background, and would become more visible in winter. However this is considered to be a minor and neutral impact.
109. RV14: John Billam Sports Ground: This view is taken from 1.1km to the east, across the open space of these sports grounds in Kenton. Existing housing and trees are visible on the park boundary in the background. The tops of three of the buildings would be glimpsed in the background of this view. This is a low value view with no heritage significance, and the effect would be minor and neutral.
110. RV15: Woodcock Hill: This view is from the junction of Woodcock Hill and The Ridgeway, to the northeast of the site and on the southeast edge of Northwick Circle Conservation Area. This view has medium value due to its scenic quality, however the proposal would not be visible behind existing built form other than by a limited glimpsed view of the top of two buildings, and would have no effect on this view.
111. RV16: Stanmore Country Park: This view is approximately 5.5km from the site, but is identified in LB Harrow's Local Plan Policy DM3 as a protected long range view from an area of open space. The view offers an open panorama view from a raised vantage point towards the undulating landscape of northwest London, and Stanmore Country Park extends into the far middle ground of the view. This view has a high value, given its policy designation, and a high scenic value. The proposed development would be visible within the far background, blending in to the surrounding townscape and staying within the existing skyline formed by St Mary's Church and Harrow-on-the-Hill. It would have a minor and neutral effect on the view.
112. Based on RV13 and RV15, it is considered that the proposal would result in no harm to the Sudbury Court and Northwick Circle Conservation Areas or to the Grade II listed Windermere pub or its setting. Based on RV11 and RV12, it is considered that the proposal would result in less than substantial harm to the settings of the Grade II Listed Buildings of The Art School and Grove Hill House The Foss, of the Grade II\* Listed Buildings of the Vaughan Library and Harrow School Chapel and to the setting of the Harrow School Conservation Area. Whilst some harm could arise to the settings of these buildings and the Conservation Area, due to taller buildings becoming visible in their setting, such harm would be less than substantial.
113. The scheme proposes a number of public benefits including new housing, affordable housing, contributions to social infrastructure including a reprovided nursery, improved public realm and economic benefits, including the creation of jobs within a high-quality development. Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and the NPPF, it is considered that the less than substantial harm to the designated heritage assets as described above would be outweighed by public benefits of the proposal.
114. A further view was submitted at the request of officers, as the site sits within a protected view corridor identified in Barnet's Core Strategy 2012, from Golders Hill Park in Barnet to Harrow-on-the-Hill. This viewpoint at the northeastern edge of Golders Hill Park is approximately 9km away from the site. This view has a high value due to its high scenic value and protected status. Whilst a limited view of the upper floors of the proposed buildings may be visible on a clear day in winter, they would be indiscernible due to the distance and would blend in with the surrounding townscape. The impact on this view would be negligible and neutral.
115. It is noted that Harrow Council has recommended reducing the heights of the taller buildings to limit impact and intrusiveness into open views out from Harrow on the Hill. However, your officers consider that the representative views discussed above demonstrate that the buildings would only be glimpsed within the context of existing built development from these views. Furthermore, officers have visited Harrow on the Hill and consider that the views provided adequately reflect the range of viewpoints available within the public realm. Of the four buildings over ten storeys in height, Block B1 at 15 storeys and Block C1 at 13 storeys also form part of the full planning application reference 20/0701, for which Planning Committee has resolved to grant permission, whilst Block D1 at 14 storeys and Block D2 at 13 storeys would be comparable in height.



116. In summary, the proposed development would only have moderate impacts from nearby viewpoints within Northwick Park, and these are considered to be generally beneficial given the poor quality of the existing townscape on site and the low sensitivity of the viewpoints. Impacts on other viewpoints would be minor, and protected views identified in LB Harrow's Policy DM3 would not be significantly affected. The view of St Mary's Church spire would retain its primacy as a landmark within the surrounding area, and views towards Harrow Village and the school from Northwick Park would be unimpeded. From Harrow-on-the-Hill looking towards the Park, there are likely to be glimpsed views of the upper stories of the taller proposed buildings, but these are considered to be minor and neutral effects. The impact on heritage assets, townscape character and visual amenity in the surrounding area is considered to be acceptable.

#### Solar glare impacts

117. As the nearest buildings on the University land (Phase 4) would be approx 55m from the railway lines to the north, the potential for solar glare to affect drivers of trains was assessed, based on four key viewpoints along the railway line where a driver approaching the site may need to make a decision and so could be particularly sensitive to distraction and glare. These are generally signal locations close to the site.
118. The results of this assessment are reported in Chapter 10 of the Environmental Statement. The existing buildings within the site do not cause any noticeable solar glare. From three of the four viewpoints assessed, solar glare would be limited to a short amount of time between 15 degrees and 30 degrees from the driver's focal point, causing minor but not significant adverse effects. From the fourth viewpoint there would be no solar glare. The assessment is based on a worst-case scenario which assumes that all building facades would be fully glazed and so fully reflective, and based on a year with no cloud cover and the maximum potential sunlight. It is therefore considered to be sufficiently robust to cover any detailed development proposals that could come forward under reserved matters.
119. The Design Code identifies the proposed materials for the university buildings as including cladding systems, brickwork and stone which would be expected to reduce solar glare. It is considered that detailed design solutions should aim to eliminate solar glare as far as possible and, to ensure that this is achieved it is recommended that a revised solar glare assessment is required under reserved matters for Phase 4.

#### **Relationship with neighbouring properties and amenity spaces**

##### Policy background

120. Any development will need to maintain adequate levels of privacy and amenity for existing residential properties, in accordance with Brent's Policy DMP1 and the guidance set out in the Brent Design Guide SPD1. Separation distances of 18m between habitable room windows and 9m to existing private rear boundaries should be maintained in order to ensure privacy for existing and new residents. This standard is also applied to ensure that the development does not compromise the redevelopment of adjoining sites, and to establish adequate separation distances between individual buildings within large developments.
121. SPD1 requires that, to ensure light and outlook to existing properties is not affected, proposed buildings should sit within a 30 degree line of existing habitable room windows and a 45 degree line of existing private rear garden boundaries. Where buildings would be within a 25 degree line of existing windows, the Building Research Establishment considers that levels of light to these windows could be adversely affected and recommends further analysis of the impacts. The BRE's Site Layout Planning for Daylight and Sunlight 2011 guidance recommends two measures for daylight. Firstly, the Vertical Sky Component (VSC) assesses the proportion of visible sky and is measured from the centre of the main window. If this exceeds 27% or is at least 0.8 times its former value, residents are unlikely to notice a difference in the level of daylight. Secondly, the No Sky Contour or Daylight Distribution assesses the area of the room at desk height from which the sky can be seen. If this remains at least 0.8 times its former value, the room will appear to be adequately lit. To assess impacts on sunlight to existing south-facing windows and amenity spaces, assessment of Annual Probable Sunlight Hours (APSH) is recommended. Adverse impacts occur when the affected window receives less than 25% of total APSH including less than 5% in winter months, or when amenity spaces receive less than two hours sunlight on 21 March or less than 0.8 times their former value. However, the BRE also

recognise that different criteria for daylight and sunlight may be used in dense urban areas where the expectation of light and outlook would normally be lower than in suburban or rural areas, and the NPPF 2019 also supports a flexible approach to applying standards in order to make efficient use of sites.

### Scope of assessment

122. Impacts on daylight and sunlight to neighbouring buildings have been analysed in accordance with the BRE Guidelines, and the findings are summarised in Chapter 10 of the Environmental Statement and the accompanying appendix. These include Northwick Park Hospital buildings (other than those not reliant on natural light, such as operating theatres) and student accommodation associated with the University of Westminster and it is considered that, whilst these are not primary residential accommodation, occupants would still have a reasonable expectation of daylight. Impacts on existing residential properties within the site have also been assessed, together with potential overshadowing to Northwick Park and the green spaces around the student accommodation buildings.
123. The impact on residential properties on Northwick Avenue to the north of the railway line have also been assessed, however the development would sit within a 25 degree angle of the midpoint of the ground floor windows on these properties, and so further analysis of daylight sunlight impacts is not required. The relationship of the proposed development to these properties would also comply with Brent's requirements set out in SPD1. Rear gardens of these properties are 110m away from the proposed development, which is considered sufficient distance to prevent any overshadowing of these gardens, and the raised railway tracks would provide an additional buffer to prevent any overlooking or loss of privacy to these properties.
124. Existing residential properties in the southern part of the site would be redeveloped in Phase 3 and the construction phasing assumes that Phase 1 would be completed in 2024 Q2 and Phase 3 begun at the same time. On this basis, the main impact on existing properties would be from construction nuisance rather than from the completed buildings. However the implementation of Phase 1 does not guarantee that Phase 3 will also come forward or that it will come forward immediately after the earlier phases. The impact of the Phase 1 development upon existing residents has therefore been assessed, although it should be noted that the Planning Committee resolved to grant permission for Phase 1 of the development through application reference 20/0701, and the potential impact of this phase on those existing homes was considered for that application. This is a material consideration for the current application.

### Impact on existing student accommodation

125. The existing student accommodation buildings are arranged in a continuous line parallel to the railway line, with four wings extending out to the south at right angles to the railway line. The proposed Block E1 buildings (the proposed university buildings) would be in relatively close proximity to them, with the closest distance being 14m between the existing and proposed blocks. However, this is across an access way, where the 18m privacy distances are not applied within the guidance. Additionally, the relationship between opposing windows could be addressed when the detailed design of the building is worked up, at Reserved Matters stage.
126. In terms of impacts on daylight to rooms in this accommodation, a total of 625 rooms were tested against the BRE criteria. The majority of these (382 windows, or 61.1%) would not experience noticeable losses (i.e. less than the BRE target of 20%). Of the remaining 243 windows, 20 already experience very low levels of VSC below the target values, which accentuates the impact of new development on them, while 72 would experience a loss of VSC of between 0.8 times and 0.6 times their former value and the remaining 141 windows would experience greater losses. These windows principally serve student bedrooms, and a high proportion of the 541 rooms tested (404 rooms, or 74.7%) would retain target values of NSL so that the rooms would continue to appear adequately lit. Whilst the assessment highlights that the development would have a significant impact on some windows within the existing buildings, as noted above student accommodation does not constitute main permanent residences and occupiers normally have access to a range of other facilities and spaces.
127. Impacts on sunlight were assessed for 451 south-facing rooms, of which 91.8% and 85.8% would achieve the BRE target values for sunlight annually and in winter respectively. This is considered to be a high degree of compliance particularly given the non-permanent nature of the existing accommodation.

## Hospital buildings

128. Hospital buildings are less reliant on natural daylight than residential properties and so are less sensitive to changes in existing light levels. The assessment focused on 509 windows serving 114 rooms in the hospital buildings closest to the proposed development, which are Block K (Lister Building for infectious diseases), Block Y (Medical Research Institute Building), Block V (McMillan Cancer Unit) and the ward accommodation in Block J. Of the windows tested, 298 (58.5%) would continue to achieve BRE target values while a further 19 already experience low light levels below the target values. The remaining 73 windows would experience more significant impacts and 40 of these would be most severely impacted with a reduction in VSC values to less than 0.6 times their former value. However of the rooms affected, most (114 of 125 rooms, or 91.2%) would retain at least target levels of NSL and so would continue to appear well lit.
129. In terms of sunlight, only 23 of the rooms tested are within 90 degrees of due south and so requiring a sunlight assessment. A very high degree of compliance with the BRE target values is achieved, with 22 rooms meeting target values for annual sunlight and 18 meeting the target values for winter sunlight.
130. The proposed buildings would all be situated at least 20m distant from existing hospital buildings, and there are no concerns in relation to overlooking of existing buildings in this respect.

## Overshadowing of external amenity areas

131. The assessment considers the impact of the proposed buildings upon the retained areas of green open space around the existing student accommodation and upon Northwick Park. The impact on the Brent triangle of land, which would be developed as part of this application with new landscaping and play equipment, has also been assessed in relation to the detailed application 20/0701, which proposes the same overall massing and scale of development to the south of the triangle.
132. The results show that all amenity areas would continue to receive at least two hours of sunlight on 21 March, with the exception of small fragments of land around the student accommodation and on the southern boundary of the Brent triangle. Small areas would experience some transient overshadowing at various points throughout the day on 21 March and 21 December, and to a lesser extent on 21 June. However these effects are considered to be minimal and commensurate with the scale of development proposed.

## Conclusion

133. Overall, the impacts on daylight to neighbouring properties and amenity spaces is considered to be acceptable given the nature of the uses and the benefits associated with the proposal. Furthermore, the light available to many of the windows affected on existing residential properties is already constrained by features such as overhanging eaves, which accentuates impacts due to new developments. Existing hospital buildings and student accommodation buildings have been developed without reference to the standards applied to new residential development, and include many examples of windows and rooms falling far short of BRE target values in their existing situation, however these types of buildings are considered less reliant on natural light than residential properties and therefore less sensitive to change. As noted above, the NPPF 2019 also supports a flexible approach to applying standards in order to make efficient use of sites.

## **Design, scale and appearance**

### Policy background

134. The NPPF seeks developments of high quality design that will function well and add to the overall quality of the area, being sympathetic to local character and history, establishing or maintaining a strong sense of place, and optimising the potential of the site to accommodate an appropriate amount and mix of development. Further detailed design principles are set out in Chapter 7 of the London Plan and Chapter 3 of the draft new London Plan, and in Brent's Policy DMP1 and the Brent Design Guide SPD1. Draft Local Plan Policy BD1 also seeks a high standard of design quality, and more specific guidance on tall buildings is given in draft new London Plan Policy D8, and Brent's draft Policy BD2 and draft Tall Buildings Strategy.
135. The site is located within the Northwick Park Growth Area (BNWGA1) proposed site allocation. The

site allocation sets out that tall buildings on the site should respond to the height of the existing hospital buildings and ensure that there is a stepping down towards the Metropolitan Open Land area (MOL) and nearby residential areas. Brent's Tall Buildings Strategy 2019 identifies the site as being suitable for buildings ranging between 6 and 13 storeys, however, consideration must also be given to the site allocation and how the development responds to the character of the surrounding area.

#### Character of surrounding area

136. The existing buildings adjoining the site are of an institutional scale and nature, and include the main Northwick Park Hospital building, which is the equivalent of eleven storeys in height, and a twelve-storey building fronting Watford Road on the University Campus. The existing residential buildings within the site are three- to four-storey with pitched roofs, and other buildings scattered throughout the Hospital grounds are generally four to six stories and smaller in bulk. From Northwick Park Station, there is an entrance to the university campus to the west, through an undercroft in a three-storey student accommodation block while the entrance to the hospital site is marked by the boiler house chimney to the south and the route to this site is along a narrow footpath bounded on either side by railings or fencing. Overall there is a lack of coherence, legibility and architectural character to the layout.
137. The site is visually separated from other residential areas by the open space of Northwick Park, railway lines and the hospital and university sites. Together with the scale of the development, this presents an opportunity to create a new character for the area.

#### Proposed street network

138. As with the detailed application (ref 20/0701), the layout of the site would be organised around two main routes. The residential development on the Network Homes site would be laid out around a two-way main street running through the site in a generally north-south direction parallel to the eastern boundary with Northwick Park. At its northern end, this street would connect to the northern section of the Hospital ring road, which would be converted to a two-way east-west spine road, and to the pedestrian and cycle path leading north to Northwick Park station. At its southern end, the main street would link to a pedestrian and cycle path to the south east corner of the site, where a new entrance into the Park would provide a pedestrian link to the existing footpath leading south towards South Kenton station.
139. Two east-west roads would link the main street to the existing eastern section of the hospital ring road. A pedestrian route would be provided off the main street into the Park, while vehicle routes from the main street towards the Park would only provide access to the buildings on the eastern side of the main street.
140. The works to create the spine road are included in this application but have also been granted permission separately under reference 20/0677. The spine road would also improve access for pedestrians and cyclists and provide a new main vehicular access to the university campus.
141. The existing pedestrian route through the university campus from Northwick Park station would be retained, providing access to the new university buildings as well as the existing student accommodation, and would connect to the proposed vehicular access at the western end of the university part of the site.
142. The network of routes would create a coherent, logical and legible layout. It would provide permeability through the site, offering a variety of routes for pedestrians and cyclists while rationalising vehicle traffic movements, and would provide a framework for building plots which would be developed with a variety of perimeter blocks as described below.

#### Proposed arrangement of uses and layout of buildings

143. Commercial retail uses and a new nursery would be concentrated in the ground floor of Block B1 in the Network Homes site and in the easternmost building in the university campus, which is also envisaged as providing a mix of sports and leisure facilities and other community uses. These uses would be clustered together and would form an area of active frontage at the junction of the two main routes and the footpath from the station. Together with the landscaped open space on the Brent triangle, they are intended to create a 'village hub' character. The combination of uses at this point is considered to provide a focal point for the development, a strong sense of arrival from Northwick Park station and

opportunities for social interaction within the new community. The upper floors of Block B1 would provide residential accommodation.

144. On the University land, the existing student accommodation consists of an east-west building with a series of smaller north-south wings. The proposed development would complement this building form, providing seven buildings arranged along an east-west axis facing onto the spine road and with north-south wings creating a series of courtyard spaces between. The westernmost buildings would be closest to the main University buildings and are intended to be primarily academic. Student accommodation would be concentrated within the central buildings. As noted above, the easternmost building would primarily provide sports and commercial uses as part of the 'village hub'. However the arrangement of uses is indicative at this stage. The parameter plans do not specify the arrangement of uses within the university buildings, however, and it is recommended that an active commercial frontage to this building and a minimum proportion of commercial, sports, leisure and community uses within it should be secured under reserved matters.
145. The remainder of the Network Homes site would consist of eleven buildings to the south of Block B1, which would be for residential use. Five buildings of roughly square plan form would line the eastern side of the main street along the boundary with Northwick Park, and these are envisaged as forming a 'parkside' character area. Three rectangular buildings would line the southern boundary of the site, and this area is intended to have a more suburban character. The remaining triangular section of land on the western boundary with the hospital ring road would provide three buildings of irregular shapes, which are envisaged as having an urban character to respond to the existing built form on the hospital site.
146. The parameter plans define the uses permitted in each building, its location, maximum size and height. The 'character areas' are indicative at this stage, and would be established in detailed design proposals to be brought forward at the reserved matters stage. However, comprehensive guidelines to inform the detailed design process are set out in the Design & Access Statement and Design Code submitted with this application.

#### Height, mass and bulk

147. The maximum height of each building is defined on the parameter plans and is summarised in the table below.

Block	Location	Max height in metres	Max height in storeys
B1	Village hub	55m	15 storeys
C1	Western boundary	49m	13 storeys
C2	Eastern boundary	30m	8 storeys
C3	Eastern boundary	30m	8 storeys
C4	Eastern boundary	30m	8 storeys
D1	Western boundary	47m	14 storeys
D2	Centre of residential site	44m	13 storeys
D3	Eastern boundary	33m	9 storeys
D4	South western boundary	35m	10 storeys
D5	Southern boundary	25m	7 storeys
D6	South eastern boundary	27m	7 storeys
D7	Eastern boundary	30m	8 storeys
E1	Eastern boundary of university site	36m	9 storeys

E1	Centre of university site	30m	8 storeys
E1 (three buildings)	Centre of university site	32m	9 storeys
E1	Western boundary of university site	36m	10 storeys
E1	North western boundary of university site	26m	7 storeys

148. As with the detailed application reference 20/0701, the overall strategy for building heights is to increase height towards the Hospital buildings whilst keeping relatively low heights on the northern, eastern and southern edges of the site, in order to minimise the visual impact on Northwick Park. This is consistent with the design guidelines for the site set out in the proposed site allocation.
149. The building heights are considered to respond effectively to the topography of the land, as the ground level rises towards the north-western corner and falls along the park edge towards the southeast of the site, and to the heights of the surrounding buildings. The prominent location of Block B1 provides an opportunity for a taller building to act as a landmark at the entrance to the site from the new spine road and from Northwick Park station, to aid legibility and wayfinding for residents and visitors, and to provide a sense of arrival to the development. The 13-storey maximum height of Block C1 would reinforce the landmark destination at the junction of the spine road and main street and would be appropriate to the urban character of this part of the site, whilst the heights of the university buildings would also be appropriate to this urban context. The lower heights along the Park edge and the southern boundary would integrate well with the height of the boundary tree line, to reduce the impact of bulk and mass upon users of the Metropolitan Open Land, helping to maintain a sense of openness.
150. The detailed bulk and mass of the buildings is not defined on the parameter plans and would be established as part of the detailed design required under reserved matters. However, massing principles are set out in the Design Code accompanying this application. Each building on the Network Homes site is shown as being broken down into a variety of corner blocks and linking sections of differing heights, with 'gateway blocks' identified as being taller elements at key junctions within the street network and blocks of lower heights at smaller junctions and the linking sections being of a subsidiary scale.
151. The University buildings are shown as being less articulated although the variation in scale and height of these buildings would create visual interest and the larger simpler form of these buildings is considered appropriate to the institutional character of this part of the site.
152. Overall, the massing strategy is consistent with that of the detailed application reference 20/0701 and is considered to create a harmonious and well-balanced development. The variation in heights across the development would help to establish different characters for each area, from the intimate quality of the parkside and tertiary streets to the more dense urban character of the blocks adjoining the ring road and the institutional character of the University site. The combination of elements of varying heights and bulks required by the Design Code would provide articulation to break up the height and bulk of the buildings so as to mitigate the visual impact. Overall, the height, mass and bulk of the scheme is considered to be appropriate and can be supported.

#### Relationship to street, landscaping and public realm

153. The parameter plans define the character of streets within the street network and the extent of soft landscaping proposed within the site. Areas of public open space would be provided on the Brent triangle, around the university buildings, alongside the main street, along the two entrances to the Park, between the three 'urban' blocks (including a large space which is envisaged as being a 'neighbourhood square') and between the three 'suburban' blocks. In addition, private or semi-private amenity space is shown within each of the buildings on the Network Homes site and between the university buildings. The existing eastern boundary with the Park and southern boundary with the Capital Ring footpath are shown as being enhanced, and street tree planting is shown along the main street, the footpath to the station and the northern side of the spine road.

154. The university site is currently visually separated from the hospital access road on its southern boundary, by railings and wire fencing on either side of the public footpath, the extensive tree belt and ground level changes. The Design & Access Statement shows the new university buildings on this site having a clear relationship with the new spine road that is intended to replace the access road, with a level landscaped frontage including tree planting providing an attractive setting for the buildings and contributing to the visual amenity of the streetscene. Some loss of the existing tree belt would be required to construct the new spine road, and this has been accepted in the determination of the application reference 20/0677 for the road works, subject to replacement tree planting being secured across the outline site. While the parameter plans would secure sufficient space for the landscaped frontage and tree planting, no details are provided of ground floor frontages, boundary treatments or ground levels at this stage. These details would be required under reserved matters, and would need to demonstrate sufficient replacement tree planting, building frontages actively engaging with the street and boundary treatments that provide adequate security without compromising visual amenity.
155. The buildings in the central 'hub' area would, as noted above, include ground floor commercial frontages that would activate the streetscene, and proposals for landscaping and public realm in this area would be expected to support and enhance its focal role, for example by providing informal seating and outdoor restaurant seating.
156. The remaining residential buildings would be expected to include features such as habitable rooms overlooking street frontages, entrances from the street to residential units where possible as well as communal entrances, in order to contribute to the character of different areas within the site. Entrances to parking and servicing areas would be located off the main street so as to avoid creating dead frontages.
157. The Design Code provides more detail on the landscaping strategy that would be applied at the detailed design stage. Key features would include a series of rain gardens along the main street, new trees and shrubs of various types and sizes, wildflower meadow planting, and a selection of hard surfaces to reflect the functions of different spaces. The Design Code also provides guidance on the lighting strategy, which would aim to minimise energy use and light pollution and to reflect the different needs of each area and would include feature lighting in the main public spaces. Locations for wayfinding and directional signs are also identified in the Design Code.
158. Further details of proposed landscaping and public realm would be required under reserved matters. However, the parameter plans allow for a generous amount of public open space that would be well distributed throughout the site and would potentially offer a range of functions and experiences. The plans are consistent with the landscaping proposals for the detailed application reference 20/0701 and the Design Code demonstrates an aspiration for high quality and carefully considered detailed design. Overall the landscaping and public realm proposals are considered acceptable.

#### Architectural approach and materiality

159. No details of elevational treatments or proposed materials are given in the parameter plans. These would be established as part of the detailed design required at reserved matters stage. However, the Design Code and Design & Access Statement set out an indicative architectural approach drawing on the character of the main Northwick Park Hospital building for inspiration. The Hospital building is based around a well defined grid pattern with a regular rhythm of window openings and structural elements, while the spacing and size of the grid divisions varies across the different floors. The proposal aims to respond to this by creating a grid structure which varies in intensity across the site, from densely packed grid structures on the Hospital ring road frontage and looser structures along the main street and on the park edge.
160. This approach is consistent with the detailed application reference 20/0701 and would reinforce the variation in character across the site expressed in the layout and building heights, creating a relatively dense urban character along the Hospital ring road elevation and a more open character along the park edges to reflect their proximity to the open space, and the main street providing a transitional zone between these two extremes. The Design Code advises that the grid approach should be focused on specific elements of buildings such as the corner blocks, with the facades in between being more simply designed to provide a balanced composition and reinforce the visual hierarchy between corners and linking elements. The grid approach would provide a strongly vertical emphasis to the development, while adding a combination of repeating rhythms and variation in grid intensity so as to further mitigate the impression of bulk and mass.

161. As with the detailed application, a materials palette is proposed, with the main building material across the Network Homes site being brick, to complement the surrounding buildings and other residential areas nearby. A variety of bricks and tones would be used to create visual interest and reflect the surrounding context. The University buildings would have a distinct materials palette including a mixture of cladding systems, glazed curtain walling and stone. The Design Code sets out in more detail how materials would be distributed across the development, and these would further reinforce the creation of varying character areas and add to the visual interest of the development. Further details of materials would be required under reserved matters.

### Conclusion

162. Overall, the layout, heights and massing strategy, and distribution of open space throughout the site are considered to be appropriate to the context of the surrounding area and to support the creation of a new residential and academic community. The indicative details and design guidance provided demonstrate that a high quality of design could be achieved across all parts of the site, subject to further details being provided under reserved matters.

### **Residential living standards**

#### Policy background

163. All residential development is required to comply with standards and criteria set out in London Plan Policy D6, including minimum internal space standards, and to provide appropriate levels of light, outlook and privacy for residents. London Plan Policy D7 also requires 90% of units to meet Building Regulations M4(2) 'accessible and adaptable homes' standards and 10% to meet M4(3) 'wheelchair accessible homes' standards. There are no specific space standards for student accommodation, however London Plan Policy H15 requires this to provide adequate functional living space and layout.
164. Policy DMP19 establishes that all new dwellings are required to have external private amenity space of a sufficient size and type to satisfy its proposed residents' needs. This will normally be expected to be 20sqm for studios, one and two-bedroom homes and 50sqm for family housing (homes with 3 or more bedrooms).
165. The DMP19 requirement for external private amenity space established through DMP19 is for it to be of a "sufficient size and type". This may be achieved even when the "normal expectation" of 20sqm or 50sqm of private space is not achieved. The supporting text to the policy clarifies that where "sufficient private amenity space cannot be achieved to meet the full requirement of the policy, the remainder should be applied in the form of communal amenity space". Proximity and accessibility to nearby public open space may also be considered when evaluating whether the amenity space within a development is "sufficient", even where a shortfall exists in private and/or communal space.
166. With regard to quality of the space, the supporting text to Policy DMP19 specifies that private amenity should be accessible from a main living room without level changes and planned within a building to take maximum advantage of daylight and sunlight, whilst Brent's SPD1 specifies that the minimum depth and width of the space should be 1.5m.
167. London Plan Policy D6 specifies that where there is no higher local standard, a minimum of 5sqm of private amenity space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. The minimum depth of 1.5m is reconfirmed in the policy.

#### Internal space

168. No details of residential layouts have been provided, as the application is in outline only. However, the Design Code states that all units would comply with minimum internal space standards and floor to ceiling heights, that north-facing single aspect units would be avoided, and that layouts would be designed to ensure adequate light, outlook and privacy, for example by including privacy zones of 1m-3m depth for all ground floor habitable room windows.
169. The Design and Access Statement demonstrates how measures such as external walkways would be used to achieve, indicatively, 72% of homes being dual aspect, and how inclusive design principles would be applied to, for example, achieve 10% of new homes as wheelchair accessible. The Design Code states that wheelchair accessible units should generally be located on ground floors or accessed



directly from the street or be situated in blocks that have two lifts. Compliance with these criteria in reserved matters applications would be required by condition.

170. The relationship between the non-residential floorspace and the residential units in Block B1 would need to be carefully considered during the detailed design stage in order to ensure satisfactory internal noise levels for residents. Further details to demonstrate this would be required by condition.
171. Detailed layouts for the proposed student accommodation would also be required under reserved matters. These would need to demonstrate adequate living space and functional layouts in accordance with London Plan Policy H15.

#### Daylight and sunlight

172. The detailed application reference 20/0701 was subject to an analysis of daylight and sunlight received by individual rooms within the proposed development. This found that the majority of rooms assessed would achieve full compliance with the BRE Guidelines in each of the tested scenarios, with 83% meeting the Average Daylight Factor (ADF) target and 69% complying with the Annual Probable Sunlight Hours (APSH) target with the outline application proposals also in place. A similar analysis has not been carried out for this application as detailed room layouts and window positioning are not known at this stage. However, this would be required under reserved matters to demonstrate that the residential units would receive good internal light levels for a dense urban setting.

#### External amenity space and play space

173. No details of external amenity space have been provided at this stage, however the Design Code states that all residential units would have private external amenity space such as balconies, terraces and gardens, to a minimum depth of 1.5m. Communal amenity space would be provided as identified on the parameter plans, and the Design & Access Statement describes how this would include podium gardens within the blocks providing sitting areas, planted areas and doorstep play. Blocks to the east of the main street would also have private communal gardens along the park edge, with biodiverse planting to enhance the existing boundary treeline.
174. The Design & Access Statement also identifies locations for play spaces, including a 1,500sqm play area within the neighbourhood square, 500sqm of play space on the podium blocks of the three urban blocks, 300sqm play areas on the podium gardens of Block B1 and the three suburban blocks and near the southwestern entrance to the Park, 300sqm incidental play areas on the podium gardens of four parkside blocks, 1,755sqm of incidental play and fitness elements along the main street, and a 1,200sqm neighbourhood play area in the Brent triangle. These features would provide a total of 8,655sqm playspace, predominantly for ages up to 12 years, which would exceed the policy requirement of 7,216sqm for the estimated child yield. Older children would benefit from the proximity to the playing fields in Northwick Park and the golf course to the south of the site, and some community use of the proposed University sports and leisure facilities would also be secured.
175. Further details of private and communal amenity spaces, play spaces and the overall play strategy, would be required under reserved matters, together with maintenance arrangements and measures to ensure children do not run out into the road. At that stage, compliance with Brent and London Plan policy standards would need to be demonstrated. A small shortfall against Brent's standards could be accepted given the additional provision of public open space on the site, the proximity to the Park and the wider benefits of community use of University sports facilities.
176. It should be noted in this context that the detailed application reference 20/0701 was assessed as delivering a good standard of amenity space provision, and the residual shortfall against Brent's standards was considered acceptable given that it would be supplemented by on-site public open space and proximity to the Park. Consequently it is considered that an acceptable level of provision could be made throughout the residential element of this site.
177. The student accommodation blocks would feature a number of courtyards between the north-south wings of the buildings, which would provide private communal space for students in addition to the more open landscaped areas around the blocks. Although the overall amount of open space on this part of the site would be less than existing, it is considered that provision of open space within the residential site should be a higher priority given the permanent nature of the accommodation and the need for child play space, and that the redistribution of open space in this way is therefore acceptable. Students would also benefit from the enhanced sports and leisure facilities, and from the proximity to

the Park.

### Relationship between proposed units

178. SPD1 specifies that while the distance between directly facing habitable room windows should normally be 18m, reduced distances between new frontages may be acceptable subject to the consideration of overlooking and privacy as well as high quality design. Most of the blocks are proposed within a distance of 18m to 25m between opposing facades. However the parameter extent for some of the eastern blocks fall below this and are within 8m - 9m of each other (e.g. between blocks C2 and C4, C3 and D3, and between D3 and D7). The building outlines shown on the parameter plans represent the maximum extent of the buildings, and the relationship between buildings is refined at detailed design stage. The indicative CGIs provided in the design and access statement and the approach to the landscaping shown in the Design Code suggest that the narrowing between buildings is evident at either end of the block, with the width increasing between these bookends and lower (typically 2-3 storeys) mews homes fronting these streets. It is considered that this approach would successfully create a variety types of homes and public spaces within the scheme. The indicative CGIs provided in the design and access statement and the approach to the landscaping shown in the Design Code suggest that the narrowing between buildings is evident at either end of the block, with the width increasing between these bookends and lower (typically two to three storeys) mews homes fronting these streets. It is considered that this approach would successfully create a variety of types of homes and public spaces within the scheme.
179. Furthermore, detailed layouts for Blocks C2 and C4 have been provided and assessed under reference 20/0701. These include secondary windows to habitable rooms on side elevations at a separation distance of 8.5m, which is considered acceptable in an urban context as these do not provide the primary outlook for the rooms concerned, and mews houses with stepped facades facing each other at a distance of 12m but with a distance of 14.8m between habitable room windows. Following discussions with officers, the layout of the mews houses was altered so that habitable room windows would not directly face each other. More generally across the detailed application, some isolated instances of separation distances being reduced to 13m were considered to be characteristic of urban living and were accepted on this basis. This demonstrates that a high quality environment could be provided. The final layout and design of the homes and public spaces would be determined under the reserved matters applications to ensure that the quality of the homes and spaces that is indicated within the design and access statement is carried through when the scheme is designed in detail.

### **Wind microclimate**

180. London Plan Policies D3, D8 and D9 emphasise the importance of the local microclimate created by new development involving tall buildings, in particular the need to ensure comfortable wind conditions. In accordance with these policies, a Wind Microclimate Assessment was submitted as an appendix to the ES and summarised in Chapter 11 of the ES. This includes consideration of the impact of climate change, however probable changes in median wind speeds from the baseline scenario to the 2080s are not predicted to exceed 0.07m/s, which would not significantly impact on the predicted wind microclimate conditions.
181. The assessment uses the Lawson Comfort Criteria, which is the industry standard defining how an average pedestrian would react to different wind levels. Wind speeds are categorised as being suitable for either sitting, standing, strolling or walking, or as uncomfortable for most activities. Developments should aim to provide at least strolling conditions along pedestrian thoroughfares, standing conditions at main entrances, drop off areas, taxi ranks and bus stops, sitting conditions at outdoor seating areas in the summer, and standing conditions in large public amenity spaces in the summer, with sitting conditions at designated seating locations. Finally, sitting or standing conditions should be achieved in summer on balconies and private amenity spaces – providing sitting conditions in summer would generally ensure that standing conditions could be maintained in winter. Strong wind thresholds requiring mitigation measures are also defined.
182. The assessment includes various scenarios, of which Configuration 4 represents the blocks proposed under the detailed application reference 20/0701 and associated landscaping measures being completed and the parameter blocks proposed under this application also being in place. As with the detailed application, a number of balconies on the taller elements of Blocks B1, C1 and C4 would not achieve sitting or standing wind speeds in summer and would require mitigation measures. These measures would be secured under condition for the detailed application.

183. The assessment does not identify wind conditions in the remaining phases of the outline application, as features such as the exact height, bulk, mass and design of the buildings, the position and design of balconies, and the types of landscaping proposed have a significant impact on wind conditions experienced on site. These details are not known at this stage for this application. Consequently it is recommended that a further wind microclimate assessment for each Phase, together with recommended mitigation measures, be required under reserved matters.

## Green infrastructure and natural environment

### Impact on trees

184. Trees are a material planning consideration, and also contribute to the biodiversity value of the site by providing habitats for birds, bats and other wildlife. Brent's emerging Policy BGI2 requires major developments to retain trees on site and where this is not possible to provide compensation through replacement tree planting or a financial contribution to tree planting off site.
185. The site includes a number of mature trees scattered throughout the site, including a number on the boundary with the Park which reinforce the mature tree belt along the Park side of the boundary. An Arboricultural Impact Assessment has been submitted, identifying a total of 692 trees and tree groups of which 387 would be removed to facilitate the development. All trees have been categorised as Category A, B or C (high, moderate or low quality) or U (those which not suitable for retention due to their poor condition).
186. It is important to note that the Assessment includes trees along the Hospital access road and the detailed application site, and that the loss of some trees in these parts of the site has already been accepted (as the redevelopment of the Hospital access road has been granted permission separately under reference 20/0677 and Planning Committee has resolved to grant permission for the detailed application site reference 20/0701). The proposal in this case is consistent with these two applications, and would not lead to any further loss of trees on these parts of the site.
187. In terms of the remaining areas of the outline application site, a total of 324 trees and tree groups have been identified, of which 213 would be removed to facilitate development. However, the majority of these would be the less valuable Category C or U trees within the body of the site. Almost all of the trees forming the tree belts along the eastern and southern boundaries of the site would be retained, and no trees within the Park would be removed.
188. Although a number of trees along the Hospital access road would be removed, the loss of these has been accepted in the determination of the highways application reference 20/0677, and these would include only one Category A tree. Most of the trees along the University boundary with the road would be retained to provide a largely continuous tree belt along the road. No other Category A trees would need to be removed within the remaining areas of the outline site.
189. A summary of trees to be retained and removed across each part of the site is provided in the following tables:

#### Trees on Hospital access road:

	Retained			Removed		
	Trees	Groups	Subtotal	Trees	Groups	Subtotal
<b>U (unsuitable for retention)</b>	0	0	0	21	1	22
<b>A (high)</b>	2	0	2	1	0	1
<b>B (moderate)</b>	91	0	91	58	0	58
<b>C (low)</b>	76	2	78	34	15	49
<b>Totals</b>	<b>169</b>	<b>2</b>	<b>171</b>	<b>114</b>	<b>16</b>	<b>130</b>

#### Trees on detailed application site (no Category U trees on this part of site):

	Retained			Removed		

	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>
<b>A (high)</b>	1	0	1	0	0	0
<b>B (moderate)</b>	20	2	22	12	0	12
<b>C (low)</b>	0	0	0	29	3	32
<b>Totals</b>	<b>21</b>	<b>2</b>	<b>23</b>	<b>41</b>	<b>3</b>	<b>44</b>

**Trees on remaining areas of outline site:**

	<b>Retained</b>			<b>Removed</b>		
	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>
<b>U (unsuitable for retention)</b>	0	0	0	7	2	9
<b>A (high)</b>	2	0	2	0	0	0
<b>B (moderate)</b>	58	1	59	45	1	46
<b>C (low)</b>	40	10	50	152	6	158
<b>Totals</b>	<b>100</b>	<b>11</b>	<b>111</b>	<b>204</b>	<b>9</b>	<b>213</b>

**Total number of trees on site:**

	<b>Retained</b>			<b>Removed</b>		
	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>	<b>Trees</b>	<b>Groups</b>	<b>Subtotal</b>
<b>U (unsuitable for retention)</b>	0	0	0	28	3	31
<b>A (high)</b>	5	0	5	1	0	1
<b>B (moderate)</b>	169	3	172	115	1	116
<b>C (low)</b>	116	12	128	215	24	239
<b>Totals</b>	<b>290</b>	<b>15</b>	<b>305</b>	<b>359</b>	<b>28</b>	<b>387</b>

190. Trees to be removed would be of various species including Ash, Lime, White Willow, Cypress, and London Plane. Tree protection measures have been recommended in respect of retained trees, including for trees along the Park side of the boundary. These would include submission and approval of finished ground levels within the Root Protection Areas of retained trees, and would be subject to an Arboricultural Method Statement and arrangements for supervision. The Council's Tree Officer has been consulted and considers that the proposals are acceptable, subject to high quality replacement tree planting being secured, together with financial compensation for any net loss of trees on site.
191. No details of proposed replacement tree planting are provided at this stage. However, it is noted that tree planting to strengthen the existing tree belts on the eastern and southern boundaries of the site is envisaged in the Design & Access Statement, together with tree planting throughout the site as part of a wider landscaping strategy. Under the detailed application reference 20/0701, a total of approx 208 new trees are expected to be planted to mitigate the loss of 44 existing trees to be removed within that part of the site, and further details of these would be required by condition.
192. For this application, it is recommended that details of replacement tree planting, including exact numbers, locations and species, should be required under reserved matters as part of the landscaping proposals for each Phase of the development. Following the submission of reserved matters for Phase 4, or within an alternative period to be agreed should Phase 4 not come forward within a specified timeframe, a financial contribution to compensate for any net loss of trees across the site as a whole would then be required through the s106 agreement.
193. A detailed arboricultural method statement, tree protection plan and supervision schedule would also be required as a pre-commencement condition for each phase, together with details of finished ground levels within the RPA of retained trees.

Biodiversity impacts - policy background

194. London Plan Policy G6 provides protection for Sites of Importance for Nature Conservation (SINCs). Brent's draft Policy BGI1 also seeks no net loss of biodiversity and encourages urban greening proposals to also support biodiversity. The SINC designation is the lowest tier of the designations set out in Policy G6, which provides the greatest level of protection for sites with international or national designations, followed by sites of metropolitan importance for nature conservation. Whilst the overall aim of this policy (and of the emerging policies) is to protect habitats and species of biodiversity value, it states that sites with SINC status should be given the level of protection commensurate with their importance.
195. There are two SINCs relevant to this site, both classified as of Borough Importance Grade 1. The 'Northwick Park and the Ducker Pool BI03' SINC includes the tree and scrub belt along the southern boundary of the site, the tree and scrub belt and wet ditch on the eastern boundary with Northwick Park, the Brent Council parcel of land, and part of the University site. This SINC also wraps around the site to the south where it includes Ducker Pond (a breeding ground for moorhen and aquatic species).
196. The 'Northwick Park and Kenton Railsides B106H' SINC includes the railway embankment to the north of the site. This is also a designated wildlife corridor and green chain, and so is protected under Brent's Policy DMP8 and emerging policy BGI1 from development that would compromise its biodiversity or recreational function. However this is a lower status designation that reflects the importance of the vegetation alongside railway lines in providing movement corridors for a variety of wildlife, and does not in this case provide any additional protection above that afforded by Policy G6.
197. A review of all SINC sites across the Borough was conducted on behalf of the Council in 2014. In respect of the BI03 SINC, this was identified as potentially supporting reptiles, amphibians, invertebrates, birds, and foraging and potentially roosting bats. However, the main features of biodiversity value are in the Ducker Pond and golf course area to the south of the site, whilst the areas within the University and Brent Council sites consist mainly of amenity grassland with some broadleaved plantation woodland and dense continuous scrub. The review does not include any specific recommendations for these areas, but does recommend allowing meadow areas to develop adjacent to the Park boundary. The BI06H SINC consists of broadleaved semi-natural woodland and is identified as potentially supporting reptiles, birds, invertebrates and foraging bats, but the review does not make any specific recommendations that would affect the application site.

#### Biodiversity impacts - assessment of proposal

198. An Ecology Report has been submitted as Chapter 12 of the Environmental Statement, supported by a more detailed Preliminary Ecological Appraisal which aims to identify signs and evidence of protected and priority species including bats, great crested newts, reptiles, badgers, hedgehogs and nesting birds, based on local data and site surveys. The appraisal covers the outline site as a whole, and subdivides it into distinct zones.
199. Zone A1 was found to support ruderal herbaceous plants and grasses over hardstanding areas, and a small Leyland cypress boundary shrub-line on its northern boundary, while Zone A2 supports amenity grassland throughout, and scrub on the eastern boundary. These two zones comprise the detailed application site (ref 20/0701). Zone A3 (the existing Network Homes housing) supports small residential gardens, amenity grassland, scattered trees, and garden beds throughout. Zone B1 (Brent triangle) is part of the BI03 SINC and was found to be an area of open amenity grassland with a small section of mixed trees and shrubs, and hardstanding paths. Zone C (University site) includes an area of newly sown meadow land which is also part of the BI03 SINC, as well as garden beds and mature scattered trees. The proposed highway works site is also assessed as a separate zone.
200. Site surveys found that boundary vegetation and deadwood were potential habitats. Some invasive plant species were found, however other than an area of hedgerow on the southern boundary of the site no protected, priority or rare plants were observed.
201. The vast majority of the site was identified as being of very low suitability for protected and priority species such as badgers or for reptiles. Boundary habitats and the meadow in Zone C could be suitable for amphibians, although no evidence of any was found on site. Birds were observed on or close to the site, and it is considered likely that moderate numbers of common and widespread species may nest in trees and hedgerow on the site, although the newly sown meadow area was found to be very poor in suitability for ground-nesting birds, whilst the site overall is very low in suitability for protected and rare bird species that may visit the site and no evidence of these was found during the

survey. Although flat roofs may be used by nesting gulls, no evidence of this was observed. Otherwise, the site was found to be very low in ecological value or potential to support nesting birds. The survey also considered the ecological value of the ponds within the golf course grounds. However these also did not show any evidence of amphibians.

202. Some trees surveyed were considered to have potential bat roosting features, although no evidence of bat activity was found. The majority of the site was considered to have very low suitability for foraging bats, although the eastern and southern boundaries were of at least moderate suitability. The Social Club building was identified as having low bat roosting potential.
203. The appraisal then assesses the potential risk to protected and priority species. The potential impact on mammals, reptiles, amphibians and invertebrates would be low or very low. Features of highest value to foraging and commuting bats, such as boundary trees, would be retained, and the potential risk of significant impact to bats would consequently be low to moderate, however bat surveys of areas that may be used by bats were carried out on six further occasions at dusk or dawn. No evidence of bat activity or bat roosts was observed in the trees or building surveyed, and very low numbers of foraging and commuting bats were observed and detected in the area during the surveys. The risk of significant impact to bats is therefore considered to be low, and further surveys are not required.
204. The only part of the site to encroach on the 'Northwick Park and Kenton Railsides B106H' SINC is the entrance to Northwick Park station, which is a hard surfaced area and is separated from the vegetation corridor by metal paling fencing. The indicative proposals for landscaping enhancements would not directly affect the vegetation corridor or its ability to provide movement corridors for wildlife. The SINC would not be affected by development on the University part of the site, as the existing student accommodation buildings would provide an adequate buffer between the two.
205. The meadow land in Zone C was found to support a variety of plant species but was relatively newly planted and so unlikely to support any rare, priority or protected species. The meadow was inspected for signs of any such species, however no evidence of these was observed and the meadow was observed to have poor connectivity to surrounding habitats. Notwithstanding these findings, the loss of the meadow that would occur as a result of the redevelopment of the University site in Phase 4 does represent the loss of a habitat of value. Furthermore, construction works and the removal of trees on site could result in a temporary loss of and disturbance to the habitats on the eastern and southern boundaries.
206. Precautionary measures are recommended in the Ecology Report to avoid or minimise any impacts on protected species and other wildlife in the construction period. These would be secured as part of a project-specific Construction Environmental Management Plan to be required by condition for each Phase, and would include bat inspections prior to felling of any mature trees, measures to be taken if bats or other protected species are observed, vegetation and building removal to take place outside the bird nesting season or in the presence of an ecologist, protection of active bird nests, and storage of construction materials on hardstanding or pallets.
207. The completed development is expected to create new features of ecological value, including interconnected rain gardens and other beneficial habitats including native and wildlife-attracting plants and trees, whilst the eastern and southern boundary vegetation would be retained and enhanced by additional planting. Provision of habitat boxes to enhance biodiversity value across the site and a wildlife-friendly lighting strategy would be secured as part of the landscaping details required under reserved matters.
208. Updated ecological appraisals would be required by condition after the completion of each Phase and no later than two years after site-wide development, in order to assess residual biodiversity impacts. Finally, in compensation for any loss of biodiversity value in the longer term, the applicant has agreed to a financial contribution of £30,000 towards biodiversity enhancements in Northwick Park, of which £10,000 would be secured against Phases 1 and 2 to reflect the impact on the eastern boundary vegetation and the remaining £20,000 would be secured against Phase 4 to reflect the loss of the meadow.

#### Urban greening

209. London Plan Policy G5 requires major developments to contribute to urban greening, defines a generic Urban Greening Factor and sets a target score of 0.4 for predominantly residential developments (0.3 for predominantly commercial developments). Brent's draft Local Plan Policy BGI1 supports this

approach but does not propose a borough-specific Urban Greening Factor, therefore the generic Factor is used to assess developments in Brent.

210. Much of the existing site is hard surfaced and dominated by parking areas, and the proposal seeks to organise the built form around a green structure, which is welcomed. The urban greening approach provides a means of assessing how successfully the proposal achieves this aim, and an incentive to optimise green space and other natural features on site.
211. The Urban Greening Factor of a specific development proposal is based on the areas provided for features such as semi-natural vegetation, green roofs, trees, flower-rich planting, rain gardens, hedges, amenity grassland, water features and permeable paving. This information would be provided as part of the landscaping proposals under reserved matters for each Phase, and a calculation of the Urban Greening Factor for each Phase would be required at that stage. However, information submitted in respect of the detailed application (ref 20/0701) shows that this achieves an Urban Greening Factor of 0.439, which exceeds the target set out in Policy G5, and it is considered that a similarly high score could be achieved across the outline site as a whole based on the extent of green space identified on the parameter landscape plan.

## **Sustainability and energy**

### Policy background

212. The planning application has been supported by an Energy Strategy in accordance with London Plan Policy SI2. This policy requires both residential and non-residential development to be net zero carbon including a 35% reduction on-site.
213. A Sustainability Statement is required in accordance with Core Strategy Policy CP19, demonstrating at the design stage how sustainable design and construction measures are intended to mitigate and adapt to climate change over the lifetime of the development, including limiting water use to 105 litres per person per day. Major commercial floorspace is also required to achieve a BREEAM Excellent rating.

### Carbon emissions

214. The Energy Strategy proposes a hybrid (heat-pump and gas boiler) energy centre solution, and heating networks will be designed with efficiencies and design parameters to minimise distribution heat loss throughout the system. A range of passive energy-efficiency measures are proposed and, together with the hybrid district heating network and the use of rooftop PV panels, carbon emissions would be reduced by 40% for the residential elements of the development and by 37% for the non-residential elements (a combined reduction of 38%).
215. Discussions have taken place with Northwick Park Hospital with regards to the potential for the Network Homes and University developments to connect to the proposed new Hospital energy centre. However the energy centre proposal has not yet been developed sufficiently to be able to confirm that it will be available. Therefore independent energy networks would be designed for the Network Homes and University sites, and a condition is recommended to require details of how a connection to the Hospital energy centre could be made in future if this becomes available.
216. Policy SI2 requires any shortfall in achieving the target emissions standards to be compensated for by a financial contribution to Brent's Carbon Offsetting Fund, based on the notional price per tonne of carbon of £60 for a period of 30 years. Based on the Energy Strategy submitted, a contribution of £4,633,200 would be payable across the whole of the masterplan site. However, this figure is indicative only, and a detailed Energy Assessment would be required under reserved matters for each Phase, followed by updated Assessments for each Phase prior to construction and again following completion of each Phase. Financial contributions would be required against each Phase in two stages, ie at detailed design and completion, to incentivise further reductions in emissions at each stage. Proposals for off-site measures to reduce carbon emissions elsewhere in the Borough could also be proposed by the applicants in lieu of all or part of the financial contribution.

### Sustainability and BREEAM

217. The Sustainability Statement outlines how matters ranging from site management, sourcing and recycling of materials, waste management including recycling of construction waste, urban greening

and transport have been addressed in order to integrate the principles of sustainability.

218. A BREEAM Excellent rating would be targeted for the non-residential floorspace, and further details to evidence this would be secured through the s106 agreement.

### Conclusion

219. The proposal would exceed the London Plan requirements for reducing carbon emissions and would, subject to further details secured under reserved matters, conditions and s106 obligations, secure a high degree of energy efficiency and sustainability across the site.

### **Flood risk and drainage**

#### Flood risk

220. The NPPF 2019 requires a site-specific Flood Risk Assessment to be submitted for applications on sites of over a hectare in area, and this policy is reinforced by Brent's Policy DMP9a.
221. A Flood Risk Assessment has been submitted with the application. The Environment Agency Flood Zone Map shows that the whole site is located within Flood Zone 1, which is defined as land having a less than 1 in 1,000 annual probability of river or sea flooding. As such, the risk of fluvial flooding is deemed to be low. The Sewer, Groundwater & Artificial Flood Risk Web Map of the West London Strategic Flood Risk Assessment (SFRA) confirms the site has no susceptibility to groundwater flooding and is not in an area with increased potential for elevated groundwater. The bedrock geology of the site is London Clay and is likely to be impermeable in nature. Further ground investigations and winter monitoring are recommended to confirm the groundwater level beneath the site, however the risk of groundwater flooding is low.
222. The West London SFRA also indicates that there are no instances of sewer flooding on the site. A pre-development application was made to Thames Water to check the capacity of the existing public sewer to accept flows from the development. Thames Water have advised that although the public foul sewer could accept the flows from the detailed application site (reference 20/0701, equivalent to Phases 1 and 2a of the outline application), modelling would be required to determine the upgrades required to the public foul water system to accept the flows from the remaining phases of the outline site without increasing flood risk downstream. Thames Water have also indicated that the public surface water sewer could accept the surface water flows from the site, which are proposed to be restricted to the 'greenfield' rate. From the available information, the risk of sewer flooding for the proposed development is considered to be low.
223. For phases 1 and 2a, the information available from the Environment Agency website and West London SFRA for risk of inundation from reservoirs indicates that the site is not within an area at risk of flooding and is at low risk of flooding from artificial sources. For the University of Westminster and Brent Council land parcels, the information available indicates that the site is not at risk from flooding from artificial sources. From the available information these parts of the site are at a low risk of flooding from artificial sources
224. For phase 3 of the outline application site, the information available from the Environment Agency website and West London SFRA for risk of inundation from reservoirs indicates that the south-eastern corner of the site is within an area at risk of flooding. This area also corresponds to the area of high risk surface water flooding with a maximum flood level of approximately 47.90m AOD. From the available information this part of the site is at a medium risk.

#### Drainage

225. London Plan Policy SI13 and Brent's Policy DMP9b require development proposals to utilise sustainable urban drainage systems (SUDs), with the overall aim of achieving greenfield run-off rates and ensuring surface water run-off is managed as close to its source as possible.
226. A Drainage Strategy and Maintenance Statement has been submitted. This proposes a range of sustainable drainage measures including green roofs, blue roofs, lined rain gardens, lined permeable surfaces, underground attenuation tanks, proprietary treatment systems and complex flow controls. The volume of surface water run-off would be restricted to greenfield rates.



227. The Local Lead Flood Authority have been consulted and have confirmed that the site is at very low risk of flooding from rivers and the sea, artificial sources and groundwater, although some areas are vulnerable to surface water flooding. The proposal would deliver a significant reduction in overall discharge rates, from brownfield rates to greenfield rates, and this would reduce ponding areas that are present to the current site and would have a significantly positive impact on the overall flood risk to the local area including the site itself.
228. Furthermore, the implementation of sustainable drainage measures such as blue and green roofs would improve the environmental impact of the development by reducing carbon emissions and providing ecological enhancement. The attenuation via underground tanks and complex flow controls corroborates with the micro drainage calculations, demonstrating that adequate attenuation would be provided for the site overall.
229. On the basis of the information provided, the proposed development would dramatically improve the flood risk to the area, whilst the implementation of green sustainable urban drainage measures demonstrates a development that aligns with current best practice and Brent's ethos on modern SuDS implementation.

### Conclusion

230. The proposal is acceptable in terms of flood risk and drainage, and no conditions are required other than the implementation of the approved Strategy.

### **Environmental health considerations**

#### Air quality

231. Like many areas in Brent, part of the site is within an air quality management area, and London Plan Policy S11 requires major developments to be supported by an air quality assessment and to demonstrate 'air quality neutral' impacts. The assessment should consider the potential emissions to the area associated with the development as well as the potential impact on receptors to the development.
232. The applicant has submitted an air quality assessment as Chapter 9 of the ES and a supporting appendix. This assessment considers emissions during construction as well as operational impacts. All impacts are considered to be not significant if mitigation measures are in place during construction and if the energy plant is installed as per the information provided within the assessment. The assessment also includes an air quality neutral assessment and this has demonstrated that the development would be air quality neutral. As demolition and construction has the potential to contribute to background air pollution levels and cause nuisance to neighbours, a construction method statement would be required as a pre-commencement condition for each Phase to ensure adequate measures are in place to control dust, noise and other environmental impacts, and this has been acknowledged in the ES.
233. Environmental Health officers have been consulted and have confirmed that there are no objections in terms of air quality impact. No conditions are required other than compliance with the approved assessment, with controls on Non-Road Mobile Machinery and the submission of a construction method statement as noted above.

#### Noise

234. A noise and vibration assessment was submitted as Chapter 8 of the ES, with an accompanying technical appendix. Key noise sources at the site were identified as being trains, road traffic and plant services associated with Northwick Park Hospital. The survey consisted of unattended and attended noise measurements and vibration measurements. The results from the survey will be used during the design of the proposed development and as the baseline for further noise and vibration assessments.
235. Mitigation measures are proposed for the demolition and construction stage, and adequate measures would be secured through the construction method statement. No mitigation measures are considered to be necessary for the completed development.
236. The potential impacts of climate change have been considered as part of the noise assessment. Increased temperatures in summer may result in future residents having to rely on natural ventilation

for longer periods of time, exposing them to external noise for longer periods of time. However, this would be a similar prospect to that faced by residents elsewhere, and residents would benefit from relatively low levels of road traffic and proximity to the open space of Northwick Park. Furthermore, the risk of overheating in residential units has been addressed in the Energy Strategy.

237. Environmental Health officers have been consulted and have requested conditions to secure measures to mitigate construction noise and vibration, to attain adequate internal noise levels for residential units and plant noise levels, and sound insulation between commercial and residential units.

#### Contaminated land

238. The site and surrounding area has been identified as previously contaminated and therefore a full assessment of land contamination is required.
239. A desk top study has been submitted and recommends that a Phase 2 ground investigation should be undertaken.
240. Environmental Health officers have been consulted and have confirmed that a condition is required to secure a site investigation and any mitigation measures necessary.

#### Lighting

241. Environmental Health officers have requested that a lighting scheme be submitted to demonstrate that any external lighting associated with the University sports facilities complies with guidance on reduction of obtrusive light. As the residential parts of the site would also require external lighting, it is considered that a lighting scheme should be required by condition for each Phase.

#### Odour

242. Details of an extract ventilation and odour control system would be required by condition prior to first use of any A3 use or other commercial kitchens within the site.

### **Transport considerations**

#### Access

##### *Background*

243. As noted above, full details of the highway works forming part of this application have been submitted at the outline stage so access is not one of the issues that would need to be considered further at the reserved matters stage. These works would create a two-way road ('spine road') providing access to the Hospital, the residential site and the University from Watford Road, together with junction improvements on Watford Road and a new bus interchange facility and new bus stops. Further consideration of the highway works is set out in the following section of this report (paragraphs 247 to 270). However, it is important to note that the same works are the subject of a separate application for full planning permission (reference 20/0677) for which permission was granted under delegated powers on 4 December 2020, and that this element of the proposal is therefore considered to be acceptable in planning terms.
244. This element of the application provides the necessary highway infrastructure to allow vehicle, pedestrian and cyclist access from Watford Road to the site to unlock the development potential of the proposed site allocation and allow the site to come forward for redevelopment. The Transport Assessment states that in order to meet the wider aspirations of the scheme, it was considered necessary to provide a high-quality pedestrian and cycle environment at the very earliest stages of masterplanning and evaluating different options. This sought to adopt the principles of the Healthy Streets Approach and Vision Zero from the outset to embed active travel and low car use. These principles, alongside a critical requirement to ensure minimum disturbance to the Hospital, and in particular emergency vehicles, meant that the existing Hospital ring road would not be suitable.
245. The proposal also enables improved access to the retained hospital facilities and provides an opportunity to rationalise the existing accesses from Watford Road and provide a right-turn entry to allow northbound traffic to access the Hospital directly without U-turning at Northwick Park Roundabout. This in turn would be beneficial in terms of vehicle travel distances, congestion and air

quality.

246. A grant of £9.9m from the Housing Infrastructure Fund has been secured by the highway authority in order to undertake the necessary highway works to support the redevelopment of the site in accordance with the proposed site allocation, and would thus realise the opportunity to optimise the development capacity of the site. Brent's draft site allocation establishes the principle of redeveloping land within the site with access from Watford Road provided as proposed in this application, notwithstanding the progress of other Phases of development within this application. Even if specific Phases do not come forward as proposed, the junction and highway improvements delivered by this proposal would be beneficial to pedestrian, cycle and vehicle traffic on the existing highway network and within Northwick Park Hospital.

#### *Existing road layout and bus routes*

247. The site currently includes three accesses between the Hospital and Watford Road. The northern access is a left-turning slip lane entrance from the southbound carriageway, providing the sole means of access into the site and also access to the University for general traffic. The central junction comprises a three-arm right-turning signalised exit with pedestrian crossing facilities. The southern access is a left-in/left-out priority junction enforced using a triangular island, with the turn into the site restricted to buses and emergency vehicles only.
248. The existing road layout is one-way only (except for emergency vehicles, which can use the 'blue route' westwards along the southern part of the road to reach the exit junctions). There is no entry to the Hospital from the south other than for buses and emergency vehicles, and other vehicles travelling from the south can only gain access by U-turning at Northwick Park roundabout to use the left-turning northern entrance. This adds to congestion and delays at the roundabout and increases trip distances for vehicles travelling to the Hospital.
249. The hospital is currently served by a number of bus routes:
- The 182 and 483 pass the site along Watford Road without entering, with bus stops located on both sides of Watford Road.
  - The 223, H9 and H10 call at the hospital within the grounds, being diverted from their most direct route. They access the site from the southbound carriageway of Watford Road at the northern access junction and egress the site via the central access junction, continuing northbound along Watford Road. The H9 and H10 serve the Hospital ring road but the 223 does not.
  - The 186 and H14 both start and terminate within the grounds of the hospital. Both access the site from the southbound carriageway of Watford Road at the northern access junction and egress the site via the central access junction, continuing northbound along Watford Road. The 186 serves the Hospital ring road but the H14 does not.
250. The land to the west of the existing hospital buildings, including bus stops for the 186, 223, H9, H10 and a terminating facility for the H14, a circulatory road along the site frontage and landscaping between the road and Watford Road, is all adopted highway. To the east of the front building line, none of the roads are adopted and currently there is a stated 10mph speed limit. However, there is a public right of way (PROW 100) between the hospital and university which is fenced along both sides and is maintained as part of the adopted public highway.
251. The hospital facilities are located to the south of the northern part of the road and, as such, this part of the road only has a footway along its southern side. As Northwick Park Station is to the north east of the hospital, there is a zebra crossing at the eastern end of the northern access road, just at the point where the access road curves southwards. This provides convenient access to the southern footway and hospital facilities on the eastern side from the station.

#### *Proposed highway works and internal road layout*

252. The proposal would consolidate and rationalise the three accesses. The northern access junction would provide an entrance and exit for both northbound and southbound traffic, and would be a signalised junction with pedestrian crossing facilities on each arm. This access would connect to the proposed spine road. It would also provide access to the existing drop off entrance at the front of the Hospital site.
- The southern access would also be signalised to allow entrance and exit for both northbound and

southbound traffic and provide pedestrian crossing facilities (with cycle crossing facilities across the access but not across Watford Road). This access would provide access to the public car park at the front of the Hospital site and would connect to the retained one-way anti-clockwise ring road running along the southern and eastern boundaries of the Hospital (emergency vehicles would still be able to travel in both directions along the southern part of the road on a designated 'blue route').

- The central access junction would be removed. This area, together with the associated landscaping on the site frontage, is part of the adopted highway but is outside of the application red line boundary. The existing areas of circulatory roadspace would no longer be required for vehicular access following construction of the spine road, and would be stopped up as highway at the developer's expense. This would be secured at the developer's expense through S247 of the Town & Country Planning Act 1990, as part of the highway works required in the s106 agreement, and the land would be returned to Hospital ownership.
  - The existing bus interchange consisting of bus stops and stands at the front (west) of the hospital would not be retained in its current location. It would be replaced with a lay-by providing three stops and three stands along the southern side of the new spine road, with buses U-turning via a mini-roundabout midway along the new road. This location is intended to be served by the buses that currently enter the site to pick-up and drop-off passengers, and would also allow routes 182 and 483 to better serve the Hospital by being able to turn right into the site rather than stopping on Watford Road. This would improve accessibility for disabled and elderly passengers in particular, would be more convenient for passengers from the University and from the new development, and would improve bus driver access to welfare facilities.
253. The Northwick Park Hospital A&E bus stop HV on the southern part of the ring road would be removed and the Trust consider this to be a significant benefit as buses serving this stop can conflict with emergency vehicles using the blue route. The H9/H10 and/or 186 services would continue along the new spine road, serving the new eastbound St Mark's Hospital stop HW and a new alighting-only stop within the residential part of the development, returning along the eastern part of the ring road and serving the Social Club stop HU, so as to avoid the southern part of the ring road entirely.
254. The Transport Assessment analyses the impact of changes to bus stop locations in terms of passenger and driver walking times to the main Hospital central lobby. For buses stopping at the existing bus interchange, the relocation of these stops would increase the passenger walk time by four seconds, while passengers on the 186 alighting at St Mark's Hospital would have an additional 79 seconds of walking time from the new alighting only stop but could also choose to stay on the bus until it returns to the existing stop in order to avoid a longer walk. Driver walking times to the nearest welfare facility would be reduced or unchanged.
255. Amendments to bus routes have been agreed in principle with Transport for London but would not fully come into effect until such time as the residential development in Phases 1, 2a and 3 is completed. Provision of new bus stops and stands would be secured through the s106 agreement, and a financial contribution would be secured towards bus service improvements.
256. Two accesses into the University would be provided off the spine road. The existing access would be remodelled as an entrance to the servicing yard and the existing one-way loop road around the campus, while the main two-way access would be from the proposed mini-roundabout. Whilst the accesses would be provided as part of highway works, additional road works to be undertaken as part of development within the University campus are shown on the plans as being indicative at this stage, and further details would be secured under reserved matters or through separate planning applications as appropriate.
257. The new spine road is intended to become adopted through a Section 38 Legal Agreement, with a s278 Agreement covering the changes within the existing adopted highway land. This would require the existing stated 10mph speed limit to be altered to no lower than a 20mph speed limit in line with highway regulations. This speed limit would need to be complemented by traffic-calming features along the length of the road, which would need to be bus and ambulance friendly. These features would be incorporated into the detailed design drawings at the S38 approval stage.
258. The changes to the access arrangements would allow all vehicles to turn right from the northbound carriageway of Watford Road into the Hospital and thus avoid performing a U-turn around the Watford Road Roundabout. The applicant's transport consultants have been in liaison with Brent's Traffic Management Team, who are broadly supportive of the introduction of a right-turn facility into the

Hospital site from Watford Road, as this would improve highway efficiency and reduce traffic flows around the roundabout. A traffic scheme to signalise the roundabout and make it more pedestrian and cyclist friendly is being pursued separately by Brent's traffic team.

259. In terms of pedestrian and cycle facilities, a 3.5m wide shared footway and cycleway is proposed to the north of the new spine road, introducing a footway on this side for the first time. The existing zebra crossing at the eastern end of the existing road would be relocated approximately 100m to the west and a 2m wide footway would run along the southern side of the road. Pedestrian crossings would be provided at the new north and south signalised junctions with Watford Road. These crossings, albeit staggered, would be an improvement on the current provision, which is limited to one straight-ahead crossing at the existing central access. They would provide improved controlled crossing facilities and an improved link to the shared use facilities along the western side of Watford Road.
260. It is acknowledged that straight-across crossings would create less delay for pedestrians and cyclists. However, they would increase journey times for general traffic and buses, which is a critical consideration due to Watford Road's importance as a London Distributor Road and bus corridor. Vissim modelling was initially carried out by the applicants to assess the viability of straight-across crossings, but this was demonstrated to result in too significant an impact on general traffic and bus journey times. Consequently, staggered crossings with internal stop lines are proposed to balance the competing demands of all road users. Details of pedestrian waiting times were provided, and the timings of between 40 to 67 seconds are considered acceptable.
261. With regards to the spine road, transport officers initially considered that there was a lack of treatment to give priority to pedestrians and cyclists when the route crosses the two access roads into the university site. Revised plans now include raised tables and priority markings for the University's western access, which are welcomed, and further consideration would be given to this matter at the detailed design stage, so that priority is given to pedestrians and cyclists where they cross the University access road.
262. Transport officers initially raised concerns that, whereas all of the hospital buildings and bus stops are on the southern side of the road, only one formal pedestrian crossing was proposed. As a result of this an extra pedestrian crossing is now proposed.
263. The original design showed the footway/cycleway of the new spine road and accesses into the University also encroaching over the existing public footpath in a number of areas. The amended plans show the public right of way in its existing alignment alongside the proposed footway / cycleway. This would be included within the detailed design for assessment through the S38/278 works but is acceptable in principle and has resolved officers' concerns on this point.
264. Finally, the initial layout did not provide details as to how the cycle facility would be accessed at either end of the spine road. The only formal cycle provision to the west of the hospital site is the shared-use footway adjacent to the northbound carriageway of Watford Road, which begins at the central site access junction and terminates at the Northwick Park roundabout subway. No formal provision was originally proposed for cyclists travelling to and from the south. The applicants have since submitted revised plans which include a shared footway / cycleway along the eastern side of Watford Road within the grounds of the site, which crosses the accesses to the site via toucan crossings and continues along the existing shared footway/cycle way south of the site. This has resolved Transport officers' concerns on this point.
265. Following these amendments, the proposed road layout is considered to be acceptable in transport terms. The removal of the central access junction and provision of new pedestrian crossing facilities at each new signalised junction are also considered to be significant highway benefits, whilst the provision of a high quality pedestrian and cycling environment generally accords with current planning, transport and sustainability objectives.

#### *Healthy Streets Assessment and road safety*

266. The Mayor's Transport Strategy 2018 introduced a Healthy Streets approach to encouraging walking, cycling and use of public transport. This is supported by Draft London Plan Policy T2, which requires proposals for new development to reduce the dominance of vehicles on London's streets and connect to local walking and cycling networks as well as public transport. Transport for London provide guidance on conducting Healthy Streets Assessments and Active Travel Zone Assessments in support of planning applications. This approach in turn contributes to the Mayor's Vision Zero aim of reducing

road danger so that no deaths or serious injuries occur on London's streets.

267. The applicants have submitted a Stage 1 Road Safety Audit as part of the Transport Assessment. This has raised a number of issues in relation to potential safety impacts around the Watford Road junctions, and put forward recommendations to address them, including signage, amendments to signal phasing, advance publicity and traffic marshalling in the first weeks of operation to ensure regular drivers comply with the new layout. These issues would be addressed in the detailed design, construction and operation of the road layout.
268. The applicants have also submitted a Healthy Streets Check and Active Travel Zone Assessment in accordance with Draft Policy T2. The Active Travel Zone Assessment aims to identify barriers to sustainable travel choices in the wider surrounding area that could be addressed to support new residents in making such choices. These mainly relate to the poor quality of the pedestrian links across Northwick Park roundabout. This is an issue that has already been identified by Brent as the highway authority, and a scheme to improve these links is planned to be implemented. Community Infrastructure Levy funding could be used for such works, which are not directly related to or necessitated by the redevelopment of this site.
269. The Healthy Streets Check scores the existing and proposed highways situation against 28 criteria, with a score of 0 being poor and 3 being good, the maximum possible score being 84 (3 x 28). This exercise has been carried out separately for the three segments of the highway works – the southern junction and southern part of Watford Road, the northern access and junction and western part of the spine road, and the eastern part of the spine road.
270. For the first segment, the proposal scores 56 against 43 for the existing situation, with existing traffic conditions on Watford Road leading to a relatively low score and the proposal improving the environment for cyclists and pedestrians. For the second and third segments, the scores of 64 against 45 and of 71 against 55 for the existing situation also reflect the enhanced pedestrian and cycling environment including the proposed pedestrian and toucan crossing across Watford Road, enhanced landscaping and footway surfacing.

#### Impact on existing parking

271. The northern section of the ring road currently accommodates roadside staff parking for 148 cars for the use of Northwick Park Hospital and these would be lost as a result of the works to create the new spine road. The development of Phases 1 and 2a of this application (part of the residential site) would result in the loss of 594 staff car parking spaces serving the Hospital. However, it is important to note that the loss of parking on the ring road and within the residential site has already been accepted in principle under the detailed applications for the highway works and for Phases 1 and 2a.
272. Staff parking on the site is being replaced as part of the consolidation of existing surface level parking across the Hospital in a new multi-storey staff car park (MSCP) on the southeastern junction of the proposed spine road and the eastern section of the one-way ring road, which will provide 697 spaces. Vehicles will access the MSCP from the east via the retained ring road and exit from the north onto the westbound lane of the new spine road. The MSCP was granted planning permission under reference 19/4272 and construction was underway at the time of the officer's site visit in September 2020. The s106 agreement would secure the completion and operation of the MSCP prior to any works starting that would compromise the use of existing surface level hospital parking, and a construction management plan would be required by condition, to secure arrangements to ensure satisfactory access to hospital facilities including parking throughout construction.
273. Previously, existing parking has been scattered throughout the hospital grounds, with a total of 1,288 staff spaces. The MSCP application includes the retention of 285 existing spaces in addition to the provision of 697 new spaces, giving a total of 982 spaces for hospital use. As noted above, this arrangement has been approved under reference 19/4272, when Transport for London and Brent's highway officers supported the reduction in parking provision. In terms of this application, it should be noted that the assessment of trip generation as a result of the development includes the approved level of hospital parking rather than the previous higher level.

#### Road layout within site

274. The parameter movement plan shows that the spine road would join onto a secondary vehicular access route running from Block B1 roughly north-south between the residential blocks, with two

east-west routes leading from this to allow traffic from within the site to exit onto the eastern section of the Hospital ring road. These would be designed to cater for lower levels of traffic than the main spine road, and would mainly be used by residents of the development.

275. The streets to the east of the north-south route would be designed as tertiary vehicular access routes, and are intended to be used only by servicing vehicles and those using the car parking areas within the residential blocks. The parameter movement plan shows these as having vehicular dead ends at defined points. Access for emergency vehicles would be available at the end of a tertiary dead-end route between Blocks D1 and D2. These streets would remain in the ownership of the applicants and would be privately managed.
276. Within the University site, the existing access at the Watford Road junction and the proposed new two-way access from the spine road mini-roundabout would be designed as secondary vehicular access routes. The existing access would become entry-only into the University servicing yard, with egress from the yard along the existing one-way loop road around the campus, which is envisaged to be for servicing vehicles only in the future. The new access would connect into the existing car park and loop road, with further detail to be provided under reserved matters. Access for emergency vehicles would be provided between the proposed University buildings (Block E1) and the existing student accommodation, and along the footpath / cycleway to Northwick Park Station.
277. The street network would also provide pedestrian and cycle routes, and there would be two points of pedestrian and cycle access into Northwick Park (between Blocks C4 and C3, and between Blocks D7 and D6).
278. It is intended that the secondary access routes described above and the pedestrian / cycle route from Block B1 to Northwick Park Station would be adopted by the highway authority, together with the new spine road. A s38 agreement would be needed to secure the construction and adoption of the main street, and this would be secured as part of the s106 agreement.
279. The road layout is consistent with that of the detailed application (reference 20/0701), which provides a two-way north-south main street with an east-west arm to the south of Block C1 joining onto the Hospital ring road, together with dead-end tertiary streets between the blocks to the east of the main street and a pedestrian and cycle entrance into the park. Under the landscaping scheme required as a condition of the detailed application, the east-west route to the south of Block C1 was secured as being for emergency and servicing vehicles only (beyond the point at which access is provided into the residential car parking within Block C1), with other vehicles able to use the north-south route to exit the site. Similar arrangements would be secured under reserved matters for this application.

#### Parking provision on residential site

280. Brent's Policy DMP12 supports car-free developments on sites in highly accessible areas, and this is reinforced by the current London Plan and the Draft New London Plan. The Public Transport Accessibility Level (PTAL) varies from 3 (moderate) at the south of the site to 5 (good) at the north of the site, which is in close proximity to Northwick Park station. Although parts of the site are less accessible, the scale of the site provides an opportunity to promote a genuinely forward thinking scheme that encourages sustainable travel patterns.
281. The Transport Assessment indicates that the overall car parking ratio for the residential site (Phases 1, 2a and 3) would be 0.2 spaces per unit. This is within the maximum allowed by Policy DMP12 for high PTAL locations, of 0.75 to 1.2 spaces per unit, and within the maximum allowance of 0.5 spaces per unit set out in the draft London Plan.
282. For a total of 1,600 units, this would equate to a maximum car parking provision of 320 spaces. It is noted that the detailed application (reference 20/0701) includes 73 spaces for 654 residential units, at a parking ratio of 0.11 spaces per unit. The remaining units to be delivered in Phase 3 could then be provided with up to 247 spaces if the maximum number of units allowed by this application (1,600) were to be delivered, which would represent a ratio of 0.26 spaces per unit for Phase 3. However it is noted that the planning statement is based on an assumption that 1,529 units would be delivered and, if Phase 3 comes forward in accordance with this it would allow for an additional 233 spaces for an additional 875 units, at a ratio of 0.27 spaces per unit. This is still within the emerging London Plan maximum allowances, and the lower PTAL rating for this part of the site is considered to justify a slightly higher parking ratio. However, the parking ratio of 0.27 for Phase 3 should be considered to be an absolute maximum, with consideration given to reducing parking provision further under reserved

matters.

283. Parking provision would need to include disabled parking spaces to cater for 3% of residents and these would need to be distributed evenly and proportionately across the site, so that all blocks have adequate access to disabled car parking. In addition, at least 20% of spaces would be required to have electric vehicle charging points at the outset, with all remaining spaces having passive provision. These details would be secured under reserved matters or by condition as appropriate, together with a car park management plan for each Phase.
284. Detailed layouts of parking areas and the access to them would be required under reserved matters. The Design Code sets out a number of principles to guide the layout, however. For example, it requires any podium or undercroft parking at ground level to be surrounded by other uses so that active frontages are maintained, with entrances to parking areas at ground level and located away from principal frontages. It also allows for an element of on-street parking to be proposed and, whilst this does not feature in the detailed application it could still be acceptable on the privately-managed parts of the street network, subject to an acceptable layout being demonstrated under reserved matters.
285. The Transport Assessment states that the detailed application would provide two short-stay parking spaces for visitors, in addition to a car club bay, and this is consistent with the plans for the detailed application, which show these parking bays on the tertiary street to the southeast of Block B1. These spaces would allow for, for example, parents to drop-off children at the nursery and other key workers such as general practice nurses and television repairers to make more extended visits to residents, and parking controls would be under private management as this is not intended to be an adopted street. Further details would be required under reserved matters for Phase 2a of this application if this part of the site does not come forward under the detailed application. Beyond this, officers consider that on-street parking (other than disabled parking bays) should not be permitted on any of the roads to be adopted as these would be incorporated within a local CPZ and residents would be ineligible for parking permits in any case.
286. To reinforce sustainable travel choices and prevent overspill parking onto neighbouring residential streets, a range of measures would need to be secured through conditions and the s106 agreement. It is noted that the hospital grounds are covered by a car parking management plan which is to be strengthened as a result of the permission granted for a multi-storey car park under reference 19/4272. Furthermore, the existing residential area in Phase 3 of the site is subject to its own private parking controls which will remain in place until such a time as this area comes forward for redevelopment.
287. The nearest public roads, which are currently subject to few if any parking controls, are the residential streets to the north of Northwick Park station approximately 250m away, the residential streets at the southern end of the parkland approximately 300m away and Windermere Avenue to the east of the West Coast railway line approximately 350m away via a footbridge to Conway Gardens. To mitigate the risk that residents might seek to park in those areas, a contribution of £200,000 towards implementation of a Controlled Parking Zone (CPZ) is required and would be secured through the s106 agreement, together with parking permit restrictions to ensure that future occupants would not be eligible for residents parking permits (except blue badge holders).
288. A contribution on this scale is considered reasonable given the scale of the development, the lack of any existing parking controls and the lack of other developments on a similar scale coming forward in the surrounding area. This contribution would be secured against Phase 1 of this application in the event that the detailed application on this part of the site (under which the contribution has also been secured) does not proceed.

#### Residential cycle parking

289. Emerging London Plan Policy T5 requires cycle parking to be provided at a level of one space per studio unit, 1.5 spaces per 1bed units and two spaces for all other units. As the exact number and mix of residential units is not known at this stage, a total cycle parking requirement cannot be confirmed. However, based on the indicative mix set out in the Planning Statement, a total of 2,791 long-stay spaces would be required, together with 40 short-stay spaces. Details of secure weatherproof cycle parking to serve the residents of each block, designed in accordance with the London Cycling Design Standards, would be required under reserved matters for each Phase.

#### University car and cycle parking



290. The existing University campus provides a significant amount of car parking (approx 300 spaces) and, whilst no details of the current number of spaces have been submitted, the Transport Assessment confirms that no new parking would be provided and the existing parking would be managed more efficiently to accommodate additional demand from the new facilities. However, a limited amount of parking for Blue Badge holders could be acceptable if this is required to accord with minimum requirements and distances from facilities. Further details of any changes to the existing parking arrangements would be required under reserved matters.
291. Cycle parking would be required to serve the student accommodation, academic facilities and sports and leisure facilities in accordance with emerging London Plan standards on the basis of anticipated numbers of students and staff. Further details of proposed cycle parking would be required under condition, together with anticipated staff and student numbers.

#### Delivery, servicing and construction traffic

292. An outline delivery and servicing plan has been submitted. Refuse vehicles would use the spine road to access the site, travelling down the north-south route and returning along the east-west routes to exit onto the eastern section of the Hospital ring road, and would also be able to reverse into the narrower tertiary streets for short distances. Transport officers consider this approach to be acceptable in principle.
293. Other servicing activities for the residential site are intended to take place from the north-south route or from the east-west route to the south of Blocks D1 and D2, with vehicles waiting on single or double yellow lines. The delivery and servicing arrangements for the University site would be incorporated into the University's existing facilities procedures in terms of centralised delivery and servicing arrangements.
294. Transport officers have accepted this approach in principle, and have sought clarification on servicing arrangements for the non-residential uses in Block B1 and in the University site. These matters would be dealt with through the submission of detailed delivery and servicing plans as a pre-occupation condition for each Phase. Servicing arrangements for the University site would need to demonstrate that these buildings could be serviced from within the University site and without relying on vehicles stopping on the spine road.
295. Further details of residential bin stores would be required under reserved matters for each Phase, and would need to comply with the detailed requirements and design principles set out in Brent's Waste Planning Guidance 2015.
296. A Construction Logistics Plan (CLP) would be required as a pre-commencement condition for each Phase. This plan would need to include the cumulative impacts of construction traffic, likely construction trips generated, and mitigation proposed. Further detail would be needed on site access arrangements and booking systems, construction phasing, vehicular routes to the site, how construction would be co-ordinated with the construction operations of other developments in the area and scope for local consolidation to reduce the number of road trips generated, so as to minimise the cumulative impacts on local residents and businesses, and measures to improve safety for vulnerable road users.

#### Traffic generation and impact on wider highway network

297. To understand the likely trip generation created by the development, TRICS data from comparable sites have been analysed and an all-modes trip rate has been identified for the AM peak, PM peak and daily totals. These data are set out in the Transport Assessment included as an appendix to the ES, and are summarised in the following paragraphs.
298. For the residential development, based on the worst-case scenario of 1,600 units, a total of 107 trips are predicted into the development and 688 outbound trips in the AM peak hour, together with 458 inward trips and 248 outbound trips in the PM peak hour, and a total of 3,952 trips each way daily.
299. As many students would be housed close to the new academic facilities, the proposed student accommodation is predicted to generate only a limited number of trips outside of the campus (one inward and two outbound in the AM peak, 20 inward and 14 outbound in the PM peak and 149 trips each way daily). The potential trip generation for the new University academic facilities has also been predicted without this internalisation of student trips, and so represents a worst-case scenario in which

221 inward and 49 outbound trips are predicted in the AM peak, 70 inbound and 131 outbound in the PM peak and a total of 1,474 trips each way daily. The commercial uses proposed on the University site are not predicted to generate a significant number of additional external primary trips.

300. Data on modes of travel to work from the 2011 Census were then used to determine the modal share of these trips. The share assumed for car travel was then adjusted down to reflect the low level of parking provided on the site and measures to encourage cycling and walking. This approach has been accepted in principle by your Transport officers and results in a net trip generation (taking into account trips by existing residents) of 254 car trips per day both into and out of the site. The findings have also been accepted by TfL.
301. The commercial uses within the site would be of a small scale and to cater for local needs. They are predicted to generate trips that are primarily either internal within the development, or linked to trips to the University and Hospital, or made locally by existing local or new residents and students. Delivery and servicing trips (to both commercial and residential units) have been assessed separately, and are predicted to total 241 cars and vans, and 487 larger vehicles, per day (most of these delivering to residential units or student accommodation).
302. The assessment of impacts on highway network capacity is based on a '2031 base minus' scenario which removes any development within the site from TfL's 2031 baseline, so as to avoid double counting. Two models have been used. TfL's Welham Model determines the impact on the wider highway network and confirms that the resulting impacts of the development would be minimal. TfL also support this conclusion. Secondly, the Local Vissim Model has been used to determine the impact of the development and associated highway works on the capacity of junctions in the immediate vicinity and changes to journey times on selected links through the junctions. The results of this indicate that the proposed new signalised junctions would work reasonably well, albeit with a marginal increase in bus journey times as buses can currently enter the Hospital site without waiting at signal junctions. These findings have also been supported by TfL.
303. The highway network assessment shows that the impact of the development would be acceptable, largely as a result of the restraint on car parking, whilst the junction improvements on Watford Road to allow northbound traffic to turn right into the site rather than U-turning around the Kenton Road gyratory would have a positive impact.

#### Public transport impacts

304. The site is close to Northwick Park Underground station, which offers frequent Metropolitan Line services to central London and various destinations in north west London, and is likely to be the principal station used by residents and other visitors to the site. Kenton station is approx 700m to the south and is served by Bakerloo Line and London Overground services, whilst South Kenton station is served by the same lines but is a little further away to the south (900m). Harrow-on-the-Hill is a principal station on the Metropolitan Line, with fast limited-stop peak hour services and Chiltern Railways mainline services between Aylesbury and London Marylebone, however this is 1,500m away so is most likely to be accessed by Underground from Northwick Park station or by bus.
305. Northwick Park station is currently constrained in terms of both capacity and access, and the need for this to be upgraded is highlighted as a key infrastructure requirement in the proposed Growth Area site allocation. There are two entrances; one to the north leading onto Northwick Avenue and one to the south leading to the University and Hospital and the application site. The two entrances are connected by a subway, which is a public right of way. The central part of the subway opens up to accommodate the ticket hall and gateline area. There are three standard ticket gates and one wide-aisle ticket gate. Cycle barriers between the southern part of the subway and the ticket gates are in place to ensure cyclists dismount. The southern part of the subway is 1.26m wide at its narrowest, increasing to 2.4m width adjacent to the ticket hall, and the northern part is 2.02m at its narrowest point. There is no step-free access to the platforms, which are accessed by a single stairway inside the ticket gates.
306. Transport for London have previously undertaken detailed studies reviewing the feasibility of delivering step-free access at the station, and have identified a preferred option, which was originally intended to be delivered by 2022. However this work has been put on hold with a view to understanding the impacts of the proposed development.
307. The applicants submitted a Station Capacity Assessment as part of the Transport Assessment. This compares three scenarios: the baseline, using data from a June 2019 survey of passenger flows into

and out of the station; the 2031 future baseline, using data from TfL's Railplan strategic transport model; and the 2031 future baseline incorporating growth from the proposed development (the '2031 baseline plus'). As the survey was undertaken outside of the University terms, the surveyed flows were uplifted using Oyster card data to reflect a typical day during the April term.

308. Passenger flows in the 2031 baseline scenario are predicted to increase by 40.6% in the AM peak and by 41.7% in the PM peak, compared to the 2019 baseline scenario. The 2031 baseline plus scenario is predicted to result in passenger flows of 60.9% in the AM peak and 65.5% in the PM peak.
309. TfL's guidance for two-way passageways provides a formula for calculating the minimum required passageway width in relation to predicted passenger flows. Based on this guidance, the capacity of the subway is appropriate for the current level of demand but would need to be increased to at least 1.31m to cope with the 2031 baseline demand. The 2031 baseline plus scenario (ie the impact of the proposed development) would require a further increase in the width of the subway to at least 1.42m. However, the guidance also requires a minimum width of 2m for passageways, and the current 1.26m width does not comply with this requirement, notwithstanding the lesser width required to accommodate current and future demand. The cycle barriers inside the subway also create conflicts of movement and result in pedestrians and cyclists manoeuvring around them inefficiently. It is proposed to relocate these to outside of the subway entrance as part of the landscaping works for the development, in order to improve passenger flows.
310. As noted above, there are currently three standard (uni-directional) gates and one wide-aisle (bi-directional) gate. Based on TfL's station planning guidance, this is already below the required standards, as the requirement for the 2019 baseline scenario is for four uni-directional standard gates and two uni-directional wide-aisle gates. Both the 2031 baseline and the 2031 baseline plus scenarios would create a requirement for five uni-directional standard gates and two uni-directional wide-aisle gates.
311. The stairway to the platforms has a width of 1.93m. Based on TfL's station planning guidance, this is adequate for the 2019 baseline scenario and the 2031 baseline. However, the 2031 baseline plus scenario would require a stairway width of 2.18m to cope with the AM peak passenger flows. Regardless of these requirements, the guidance also require a minimum width of 2.4m for two-way stairways.
312. Providing step free access to stations is an ongoing priority for TfL and is a key part of improving access for disabled passengers and others with mobility impairments such as parents with pushchairs. The development would not create a requirement for step free access at Northwick Park station, but it is likely that a number of the future residents would benefit from this to a greater or lesser extent. As noted above, works to provide step free access have been identified previously, however other options could be available which might provide a more cost-effective solution or might be more easily integrated with works to improve capacity.
313. The applicants have agreed to undertake a feasibility study on behalf of TfL, to identify options for increasing capacity at the station, to review alternative options for providing step-free access, and to identify the likely costs associated with these works. The study would be required under the detailed application or, if this does not come forward, under Phases 1 and 2a of this application. The scope of the study is currently under discussion between the applicants and TfL. At this stage, the costs of the works required are unknown, however widening the subway, in particular, could be problematic in engineering terms due to the potential impact on the railway tracks.
314. Given that capacity constraints are expected to occur as a result of baseline growth in any case and the financial viability of the scheme (as discussed above), your officers do not consider that this proposal could reasonably (or realistically) be expected to fund the cost of the works (estimated to be approximately £10 million). It is also not considered necessary or appropriate to seek a financial contribution from the Phases 1 and 2a of the development given the extent of development that would be delivered through those phases. A contribution would therefore be secured prior to the delivery of Phase 3. Taking into account the predicted increase in peak flows associated with the development (approximately 15%), the applicant has proposed a combined bus services and station improvement contribution of 15% of the cost of the improvement works identified in the feasibility study, or £1.5 million (whichever is greater). Officers consider this to be appropriate given the predicted degree of impact and the impact of a greater level of contribution on scheme viability (and thus Affordable housing) should the contribution be higher.

315. As well as addressing station capacity constraints, widening the subway would also contribute to enhancing permeability and connectivity between the site and key local destinations such as Kenton town centre and station. As such it would be beneficial both for future residents and would enable existing residential communities to access the Hospital, the Park and the commercial facilities within the development more conveniently.
316. The impact on capacity at Harrow-on-the-Hill, Kenton and South Kenton stations has also been assessed. At Harrow-on-the-Hill and Kenton stations, the impact would be marginal (ie a less than 5% increase, partly due to previous journeys from Kenton station having been over-assigned). At South Kenton station, an increase of 10.2% of passengers boarding both Bakerloo and Overground services is forecast, with 17.5% and 14.8% respectively alighting in the PM peak.
317. In terms of capacity on trains, the development is forecast to result in an extra seven passengers per train departing eastbound from Northwick Park station, in addition to one or two extra passengers on other lines. This is not considered to result in any substantial impact on crowding. These stations would also be affected by new development and growth more widely and are less likely to be used by residents of this development.

#### Public transport – buses

318. Impacts on demand for bus services in the local area were also assessed. The results suggest that there would be approx one extra passenger per bus in the AM and PM peak hours, as a result of the outline development overall. This is not considered to trigger any requirement for contributions towards additional buses.
319. Some changes to the bus services serving the Hospital are proposed as part of the application and have been agreed in principle with TfL. A number of these changes have also been secured under the detailed highways application ref 20/0677 (as discussed in paragraphs 253 to 255 above) and would come into effect following construction of the spine road.
320. Following the completion of Phase 3 of the residential site, one of the existing bus services would be diverted to loop around the development, exiting onto the eastern section of the Hospital ring road. Detailed road layouts for the residential site would be required under reserved matters, and these would need to show sufficient carriageway widths to accommodate buses in order not to prejudice the rerouting of bus services in the future. In this respect the detailed application ref 20/0701 includes a carriageway width of 6.5m along the north-south main street, which is sufficient.
321. The changes would also result in a slight increase in bus journey times on a number of the routes, due to the introduction of traffic signals at the site access and the slightly increased mileage along the spine road. TfL have provisionally accepted this and have requested a financial contribution to bus services to mitigate the delay. As discussed above, the applicant has proposed a combined bus services and station contribution of 15% of the projected costs of the improvement works identified in the feasibility study or £1.5 million (whichever is higher), which is considered to be appropriate in this instance.

#### Travel Plans

322. A Framework Travel Plan has been submitted as an Appendix to the Transport Assessment, together with a more detailed Residential Travel Plan relating to the residential phases of the site. These demonstrate a range of measures and incentives to encourage sustainable travel patterns across the site as a whole, including provision of a car club vehicle on site and three years free car club membership for residents. It is considered that the Travel Plans could be developed further to provide a wider range of measures and incentives to encourage use of sustainable transport modes, for example by supporting local cycle training and creating a cycle user group. Modal shift targets would also be required, together with the identification of Travel Plan Co-ordinators.
323. These issues could be addressed through the submission of detailed Travel Plans for each Phase of the development, which would be secured, together with monitoring and review arrangements, through the s106 agreement.

#### Encouraging active travel in surrounding area

324. In accordance with Draft London Plan Policy T2, which seeks to reduce the dominance of vehicles on London's streets, an Active Travel Zone Assessment has also been submitted. This aims to identify

barriers to sustainable travel choices in the wider surrounding area that could be addressed to support new residents in making such choices. It does so by reviewing the ease of walking and cycling to key destinations within the wider surrounding area, including nearby bus stops and train stations, the future Northwick Park to Harrow cycle route, town centres, schools and colleges, medical facilities and places of worship.

325. Northwick Park roundabout is identified as being the worst part of many of these routes. Separate to the application proposal, Brent Highways have also undertaken a highway safety review of this section of Watford Road and approaches to it, and have developed a scheme to signalise the Kenton Road (east) and Watford Road arms of the roundabout, to provide a two-stage staggered pedestrian crossing across Kenton Road. The Assessment also identifies other improvements such as traffic calming measures that could be made on Kenton Road. These measures are outside of the scope of this planning application, however improvements could potentially be funded through the Community Infrastructure Levy (CIL) funding generated by new developments such as these.
326. It is noted that neighbour objections have drawn attention to other local routes, such as the footbridge from the eastern boundary of Northwick Park across the railway lines to Conway Avenue, which could also be improved. These have not been included in the Active Travel Zone Assessment as they do not provide routes to key destinations, however such works could also potentially be undertaken using CIL funding.
327. The impacts of climate change have been considered in Chapter 7 of the ES, which provides a summary of the transport impacts of the development. Changing travel behaviours in response to climate change concerns are expected to result in a switch to more sustainable modes of travel, and to lower and zero-emission vehicles. Together with technological advances to support improved telecommuting and flexible working, these changes are expected to reduce the scale of background peak travel across the borough and London, which in turn would have a beneficial impact on pedestrian and cyclist amenity. The emerging policy context strongly supports changes of this nature. The development is considered to be resilient as it is designed to reflect both current travel patterns and the emerging policy context.

### Phasing and construction works

328. The proposed phasing of the development is set out in Chapter 5 of the Environmental Statement, together with details of how the demolition and construction process would be managed. A Construction Method Statement and Construction Logistics Plan would be required by condition prior to commencement of each Phase. A summary of the proposed phasing is provided in the table below, together with your officers' comments on specific requirements that would be secured through the s106 agreement.

Phase	Timing	Comments
Highway works	2021 Q1 – 2023 Q1	These works would need to be completed before any occupancy or use of the development. Access for hospital traffic including emergency vehicles, and for buses, would need to be retained throughout the construction process. The new Hospital multi-storey car park (reference 19/4272) would need to be completed and operational before any works involving loss of on-site parking, and access to this would need to be retained throughout the construction period.
Phase 1 (indicatively 514 units: Blocks C1, C2, C3 and C4)	2021 Q1 – 2024 Q2	Arrangements for temporary nursery provision would need to be submitted and agreed before demolition of the existing nursery. The new car park (reference 19/4272) would need to be completed and operational before the loss of any parking on site.
Phase 2a (indicatively	2025 Q1 – 2028 Q2	The new energy centre (reference 19/4272)

140 units, commercial and nursery space: Block B1)		would need to be completed and operational prior to the decommissioning and demolition of the boiler house.
Phase 2b (Landscaping works to Brent triangle)	2027 Q3 – 2028 Q2	These works would need to be completed within six months of first occupation of Phase 1 or 2a, whichever is the later.
Phase 3 (indicatively up to 946 units, Blocks D1, D2, D3, D4, D5, D6, D7)	2024 Q2 – 2030 Q2	Residents of existing affordable housing would need to be offered alternative housing where their tenancy agreements provide for this.
Phase 4 (University facilities, Blocks E1)	2023 Q2 – 2029 Q4	

## Equalities

329. 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).

## Conclusion

330. Following the above discussion, officers consider that taking the development plan as a whole, the proposal is considered to accord with the development plan, and having regard to all material planning considerations, should be approved subject to conditions.
331. The proposal is considered to respond well to the proposed Growth Area site allocation including the wider aims of upgrading Northwick Park Underground station and Northwick Park pavilion. Whilst the application is in outline only, the indicative details demonstrate that a high quality development would be delivered.

## CIL DETAILS

This application is liable to pay **£39,938,310.11** \* under the Community Infrastructure Levy (CIL).

We calculated this figure from the following information:

Total amount of eligible\* floorspace which on completion is to be demolished (E): 31746 sq. m.

Total amount of floorspace on completion (G): 162958 sq. m.

Use	Floorspace on completion (Gr)	Eligible* retained floorspace (Kr)	Net area chargeable at rate R (A)	Rate R: Brent multiplier used	Rate R: Mayoral multiplier used	Brent sub-total	Mayoral sub-total
(Brent) Sui generis	20000		16103.78	£200.00	£0.00	£4,802,377.65	£0.00
(Brent) Non-residen institutions	412		331.74	£0.00	£0.00	£0.00	£0.00
(Brent) Shops	1187		955.76	£40.00	£0.00	£57,004.22	£0.00
(Brent) Non-residen institutions	17825		14352.5	£0.00	£0.00	£0.00	£0.00
(Brent) Assembly and leisure	8500		6844.11	£5.00	£0.00	£51,025.26	£0.00

(Brent) Shops	3825		3079.85	£40.00	£0.00	£183,690.95	£0.00
(Brent) Dwelling houses	111209		89544.27	£200.00	£0.00	£26,703,380.8	£0.00
(Mayoral) Sui generis	20000		16103.78	£0.00	£60.00	£0.00	£999,132.44
(Mayoral) Non-residen institutions	412		331.74	£0.00	£60.00	£0.00	£20,582.13
(Mayoral) Shops	1187		955.76	£0.00	£60.00	£0.00	£59,298.51
(Mayoral) Non-residen institutions	17825		14352.5	£0.00	£60.00	£0.00	£890,476.79
(Mayoral) Assembly and leisure	8500		6844.11	£0.00	£60.00	£0.00	£424,631.29
(Mayoral) Shops	3825		3079.85	£0.00	£60.00	£0.00	£191,084.08
(Mayoral) Dwelling houses	111209		89544.27	£0.00	£60.00	£0.00	£5,555,625.9

BCIS figure for year in which the charging schedule took effect (Ic)	224	323
BCIS figure for year in which the planning permission was granted (Ip)	334	
<b>TOTAL CHARGEABLE AMOUNT</b>	<b>£31,797,478.89</b>	<b>£8,140,831.22</b>

\*All figures are calculated using the formula under Regulation 40(6) and all figures are subject to index linking as per Regulation 40(5). The index linking will be reviewed when a Demand Notice is issued.

\*\*Eligible means the building contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development.

Please Note : CIL liability is calculated at the time at which planning permission first permits development. As such, the CIL liability specified within this report is based on current levels of indexation and is provided for indicative purposes only. It also does not take account of development that may benefit from relief, such as Affordable Housing.

## DRAFT DECISION NOTICE



# Brent

## DRAFT NOTICE

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

## DECISION NOTICE – APPROVAL

Application No: 20/0700

To: Mr Connell  
Sphere 25  
101-135 Kings Road  
Brentwood  
Essex  
CM14 4DR

I refer to your application dated **26/02/2020** proposing the following:

Outline planning permission (with all matters reserved apart from the means of access) for demolition of existing buildings on site and provision of up to 1,600 homes and up to 51,749 sqm (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 subject to an Environmental Statement

and accompanied by plans or documents listed here:  
Please see Condition 4.

at **Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA1**

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: 19/03/2021

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 the:-

National Planning Policy Framework 2019  
London Plan 2021  
Brent Core Strategy 2010  
Brent Development Management Policies 2016  
Council's and Mayoral Supplementary Planning Guidance

- 1 The relevant part of the development as hereby permitted shall not commence until the Reserved Matters of the relevant part of the proposed development have been submitted to and approved in writing by the Local Planning Authority and that part of the development shall be carried out and completed in all respects in material compliance with the details so approved before the building(s) are occupied. Such details shall include:-

- i) Layout;
- ii) Scale;
- iii) Appearance;
- iv) Landscaping.

Reason: These details are required to ensure that a satisfactory development is achieved.

- 2 All applications for Reserved Matters pursuant to Condition No. 1 shall be made to the Local Planning Authority, before the expiration of 10 years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 and since a period of 10 years is considered to be a reasonable time limit in view of the extent and timescale of the proposal.

- 3 The development to which this permission relates shall begin not later than whichever is the later of the following dates: (a) the expiration of three years from the date of this outline planning permission or (b) the expiration of two years from the date of approval for the final approval of reserved matters, or in the case of different dates, the final approval of the last such matter to be approved.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

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

P19105 - Topographical survey  
NP-PRP-XX-XX-DR-A-2100 REV P3 - Location plan  
NP-PRP-XX-XX-DR-A-2101 REV P1 - Existing site plan  
NP-PRP-XX-XX-DR-A-2021 REV P2 - Parameter plan - landscape  
NP-PRP-XX-XX-DR-A-2019 REV P3 - Parameter plan - movement  
NP-PRP-XX-XX-DR-A-2016 REV P4 - Parameter plan - heights  
NP-PRP-XX-XX-DR-A-2013 REV P3 - Parameter plan - uses  
NP-PRP-XX-XX-DR-A-2011 REV P3 - Parameter plan - layout parameters  
NP-PRP-XX-XX-DR-A-2130 REV P1 - Illustrative proposed site plan  
NP-PRP-XX-XX-DR-A-2010 REV P3 - Demolition plan

Arboricultural Impact Assessment (Arborterra Ltd, Ref 516, 18 February 2020)  
Design & Access Statement (PRP, February 2020)  
Design Code (PRP, February 2020)  
Drainage Strategy and Maintenance Statement (Campbell Reith, Ref 13223, February 2020)  
Energy Strategy (TUV SUD, February 2020)

Environmental Statement (Trium & others, 2020)

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

- 5 Unless as provided for under Condition 41 [meanwhile use strategy], the commercial floorspace hereby approved within Use Classes E(a), E(b) and E(c) (formerly A1, A2 and A3) shall not be used other than for purposes within these use classes, and shall at no time be used for any other use, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders) without express planning permission having first been granted by the Local Planning Authority.

Reason: In the interests of proper planning and to ensure the use of the development is appropriate for the location.

- 6 The nursery floorspace hereby approved shall not be used other than as a nursery within Use Class E(f) and shall at no time be used for any other use, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders) without express planning permission having first been granted by the Local Planning Authority.

Reason: In the interests of proper planning and to ensure adequate provision of nursery facilities within the development.

- 7 No units within Use Classes E(a), E(b) or E(c) shall be provided as, or combined after completion to create, a unit that has a gross internal area of more than 499sqm.

Reason: In the interests of proper planning and to ensure the use of the development is appropriate for the location.

- 8 The development shall include no more than 1,600 Use Class C3 residential units, of which at least 16.61% shall have three or more bedrooms, and no more than 800 student bedspaces.

Reason: In the interests of proper planning and to ensure provision of family-sized units to meet Brent's housing needs.

- 9 The construction tolerances referred to in the approved drawing NP-PRP-XX-XX-DR-A-2016 Rev P4 "Parameter Plan - Heights" shall only relate to the final constructed heights of buildings. The buildings as proposed within applications for the approval of Reserved Matters shall be designed to comply with the maximum heights as denoted on this drawing, as altered by the additional height specified for lift motor rooms, plant and extract flues, and the additional height specified for parapet levels.

Details of any parapet that projects more than one metre above the relevant maximum height specified within the approved drawing shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works on the superstructure of the relevant building.

Reason: To ensure a high standard of design and appearance.

- 10 The residential units hereby approved shall at no time be converted from C3 residential to a C4 small HMO, notwithstanding the provisions of Schedule 2 Part 3 Class L of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order) without express planning permission having first been granted by the Local Planning Authority.

Reason: To ensure that an adequate standard of accommodation is maintained in all of the residential units.

- 11 The development hereby approved shall be built so that at least 10% of the residential units achieve Building Regulations requirement M4(3) – 'wheelchair user dwellings' and the remaining

residential units achieve Building Regulations requirement M4(2) – ‘accessible and adaptable dwellings’.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy D7.

- 12 The development hereby approved shall be designed so that mains water consumption does not exceed a target of 105 litres or less per person per day, using a fittings-based approach to determine the water consumption of the development in accordance with requirement G2 of Schedule 1 to the Building Regulations 2010.

Reason: In order to ensure a sustainable development by minimising water consumption.

- 13 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 Brent Policy CP19 and London Plan Policy S11.

- 14 Unless alternative details are first agreed in writing by the Local Planning Authority, the recommendations set out in the approved Drainage Strategy and Maintenance Statement (Campbell Reith, Ref 13223, February 2020) shall be fully implemented for each Phase of the development.

Reason: To ensure adequate drainage for the development and mitigate the risk of surface water flooding on and in the vicinity of the site.

- 15 Unless alternative details are first agreed in writing by the Local Planning Authority, the recommendations set out in the approved Environmental Statement Volume 3 Appendix: Air Quality (Air Quality Consultants, Ref J3821A/1/F2, 13 February 2020) shall be fully implemented for each Phase of the development.

Reason: To ensure adequate air quality for the development.

- 16 All ancillary facilities, communal amenity spaces and play spaces provided for each residential block shall be made available to residents of the relevant block (or to all residents of the development in the case of facilities and spaces located within the public realm) in all tenures.

Reason: To ensure a tenure-blind development.

- 17 Communal amenity spaces and areas of public realm included in any Reserved Matters application shall be provided, in accordance with the approved details and the landscaping scheme approved under Condition 33, prior to occupation of 25% of the residential units within the relevant building or Phase or within six months of the first use of any non-residential floorspace within that building or Phase, whichever date is the sooner.

The works defined as Phase 2b shall be provided, in accordance with the approved details and the approved landscaping scheme, prior to occupation of 25% of the residential units within Phase 3 of the development.

Reason: To ensure adequate amenity space provision for residents.

- 18 Applications for the approval of Reserved Matters relating to buildings that include residential floorspace (Use Class C3) shall include sufficient information to demonstrate how a good

standard of residential accommodation will be provided for future residents having regard to the standards set out in adopted policy and guidance.

Reason: To ensure a satisfactory standard of residential accommodation.

- 19 Applications for reserved matters for Phases 1, 2a and 3 shall include details of how residential parking provision shall be provided:

in accordance with the principles set out in the approved Design Code;  
to result in a parking ratio of no more than 0.2 parking spaces per unit across Phases 1, 2a and 3 taken together, including disabled parking spaces for at least 3% of units, which shall be distributed evenly throughout the development;  
at least 20% of parking spaces being provided with electric vehicle charging points at the outset, with all remaining spaces having passive provision.

The proposals shall demonstrate how the development will be 'car-lite', providing the minimum necessary parking provision.

Reason: To ensure parking provision is appropriate to the needs of the development and compliant with the relevant policies.

- 20 Reserved matters for Phase 4 shall include details of how existing car parking spaces within the University campus shall be managed so as to accommodate any additional demand for parking arising from the development. No additional parking provision shall be proposed as part of this Phase, other than for use by disabled persons.

Reason: To ensure parking provision is appropriate to the needs of the development and compliant with the relevant policies.

- 21 Applications for Reserved Matters for Phase 3 shall include:

- an assessment of the need for, and adequacy of the provision of within the site and surrounding area, facilities for the use of the local community;
- an assessment of the need for, and adequacy of the provision of within the site and surrounding area, nursery and early years schooling, with reference to the latest version of Brent's Childcare Sufficiency Assessment;
- proposals to include community and / or nursery floorspace within the Development to meet any identified unmet needs.
- 

Reason: To ensure the development contributes to healthy communities.

- 22 Applications for reserved matters for Phase 3 shall include:

- an assessment of the local need for specialist older persons housing;
- consideration of whether any identified unmet needs could be met within the development of Phase 3;
- detailed proposals as appropriate to deliver this form of housing within the Development should this be feasible.

Reason: To ensure adequate provision of specialist housing to meet Brent's housing needs.

- 23 Applications for Reserved Matters for Phase 4 shall include a Detailed Solar Glare Analysis to update the Solar Glare Report (eb7, Ref 3761\_RO4\_SG01, 3 February 2020) submitted as part of the approved Environmental Statement Volume 3 Appendix: Daylight, Sunlight, Overshadowing and Solar Glare, to demonstrate that the likely solar glare impacts on neighbouring transport routes would be negligible as a result of the development.

Reason: To ensure the development does not cause solar glare impacts that could prejudice safety on any neighbouring transport routes.

- 24 A communal television aerial and satellite dish system for each building, or a single system for the development as a whole, shall be provided, linking to all residential units within that building unless otherwise agreed in writing by the local planning authority. No further television aerial or satellite dishes shall be erected on the premises.

Reason: In the interests of the visual appearance of the development in particular and the locality in general.

- 25 All residential premises shall be designed in accordance with BS8233:2014 Guidance on sound insulation and noise reduction for buildings, to attain the following internal noise levels:

Daytime (07:00 – 23:00) - Living rooms and bedrooms - 35 dB LAeq (16hr)

Night time (23:00 – 07:00) - Bedrooms - 30 dB LAeq (8hr)

Reason: To obtain required sound insulation and prevent noise nuisance.

- 26 The development hereby approved shall not commence until a phasing plan showing the location of phases, the sequencing for those phases and indicative timescales for their delivery has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the plan thereby approved. The phasing plan may be updated from time to time subject to the written approval of the Local Planning Authority.

Reason: To allow the Local Planning Authority to understand the relevant phase of development that is subject to condition discharge and/or reserved matters, to ensure coordination between the phasing plan as approved and the triggers in any relevant agreement made under Section 106 of the Town and Country Planning Act 1990 (as amended) and to define the extent of a CIL phase for the purposes of the CIL Regulations 2019.

Pre-commencement Reason: The precise phasing must be known prior to the commencement of works on those relevant phases for clarity of the submission of details in relation to each of those phases.

- 27 Prior to the commencement of any building or Phase within the development a Construction Method Statement shall be submitted to and agreed by the Local Planning Authority outlining measures that will be taken to control dust, noise and other environmental impacts of the relevant building or Phase of the development, including the provision of site hoarding throughout the construction process.

The development shall thereafter be carried out in full accordance with the approved details.

Reason: To ensure an acceptable impact on the surrounding environment during construction.

Pre-commencement Reason: The impacts being controlled through this condition may arise during the construction phases and therefore need to be understood and agreed prior to works commencing.

- 28 Prior to development commencing on any Phase of the development, a Construction Environmental Management Plan (CEMP) relevant to that Phase shall be submitted to and approved in writing by the local planning authority. The CEMP shall demonstrate how all relevant recommendations made in the Recommended Mitigation, Monitoring and Biodiversity Enhancement Measures report by Skilled Ecology will be implemented during the construction of the development.

The development shall thereafter be carried out strictly in accordance with the approved CEMP.

Reason: To ensure that any harm to protected species and other wildlife is avoided or minimised during the construction process, and to assess residual ecological impacts of the development.

Reason for pre-commencement condition: Harm to wildlife on site could occur at any point

during the construction process, and adequate controls need to be in place in order to control these.

- 29 Prior to commencement of any building or Phase of the development hereby approved, a construction logistics plan relevant to that building or Phase shall be submitted to and approved in writing by the Local Planning Authority, in consultation with Transport for London. The Construction Logistics Plan shall include:

- Forecast construction trip generation and mitigation proposed;
- Site access arrangements and booking systems;
- Construction phasing;
- Vehicular routes to the site;
- Measures to improve safety for vulnerable road users and avoid conflict with routes used by hospital patients, visitors and those attending university;
- Details of how construction would be co-ordinated with the construction operations of other developments in the area and scope for local consolidation to reduce the number of road trips generated, so as to minimise the cumulative impacts on local residents and businesses.

The development shall thereafter operate in accordance with the approved construction logistics plan.

Reason: To ensure the development is constructed in an acceptable manner.

Pre-commencement Reason: The condition relates to details of construction, which need to be known before commencement of that construction.

- 30 Prior to the commencement of any Phase of the development and notwithstanding the approved Arboricultural Impact Assessment, a detailed Arboricultural Method Statement, appropriate and specific to the relevant Phase of the approved scheme, shall be submitted to and approved in writing by the local planning authority through the submission of an application for approval of details reserved by condition, setting out details of

- i. all trees to be removed;
- ii. all trees to be retained, all works within the root protection area of retained trees, and their means of protection, including: specification, construction methodology and sequencing of works for no-dig surfacing; and methodology for manual/mechanical excavation within root protection areas including the protection/treatment of any roots encountered;
- iii. finished levels for all landscaped areas within the RPA of retained trees, including any necessary means of edge restraint;
- iv. a scheme of site supervision for the arboricultural protection measures required, including details of: induction and personnel awareness of arboricultural matters; identification of individual responsibilities and key personnel; timing and methods of site visiting and record keeping, including updates; procedures for dealing with variations and incidents.

Thereafter, all works shall be carried out and constructed in accordance with the approved details and shall not be varied without the written consent of the Local Planning Authority, and the scheme of supervision shall be administered by a qualified arboriculturist instructed by the applicant and approved by the local planning authority.

Reason: To ensure retained trees are protected during construction works.

Reason for pre-commencement condition: Damage to trees can occur at any time during the construction period, and adequate controls need to be in place at this time.

- 31 Prior to the commencement of construction of a relevant building or Phase of the development hereby approved, excluding demolition and site preparation works, details of the following shall be submitted to and approved in writing by the Local Planning Authority, either within the Reserved Matters application (if specifically referenced within that submission) or under separate cover unless otherwise agreed in writing with the Local Planning Authority.

- a) Details of materials for all external surfaces, including samples which shall be made

- available for viewing on site or in another location as agreed;
- b) Details of any external plant, including locations, external appearance and any proposed screening;
  - c) Details of external CCTV, lighting and any other measures proposed to enhance the safety and security of residents and other users;
  - d) Details of the on plot connections to any future district heat network;
  - e) The internal layout of the building(s), including internal circulation areas, bin storage areas to serve residential units in accordance with the requirements of Brent's Waste Planning Guidance 2015, plant room(s), any other internal area and any areas of external space;
  - f) Details of how private and communal external amenity space for residents of the relevant building or Phase, where applicable, addresses the requirements of Brent's adopted Policy in this respect;
  - g) Details of residential cycle storage to serve residents of the building(s) in a secure and accessible location within the site in accordance with the requirements of adopted London Plan policy and the London Cycling Design Standards;
  - h) Details of cycle storage to serve any non-residential uses within the relevant building(s) or Phase in accordance with the requirements of adopted London Plan policy and the London Cycling Design Standards (Details for Phase 4 shall include proposed numbers of staff and students to be accommodated with the development, in addition to the distribution of proposed floorspace across different uses);

No building shall be occupied or used unless and until a safe means of vehicular access to associated parking provision, pedestrian access to building entrances and cyclist access to cycle storage is provided and maintained throughout the lifetime of the development.

Cycle storage and bin storage shall be provided in accordance with the approved details prior to first occupation or use of the relevant building or Phase, and shall thereafter be retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the development hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Reason: To ensure an acceptable development.

- 32 (a) Following the demolition of existing buildings on site and prior to the commencement of building works:

(i) a site investigation shall be carried out by competent persons to determine the nature and extent of any soil contamination present. The investigation shall be carried out in accordance with the principles of BS 10175:2011.

(ii) a report shall be submitted to and approved in writing by the Local Planning Authority, that includes the results of any research and analysis undertaken as well as an assessment of the risks posed by any identified contamination. The report shall include an appraisal of remediation options should any contamination be found that presents an unacceptable risk to any identified receptors.

(b) Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. A verification report shall be provided to the Local Planning Authority, stating that remediation has been carried out in accordance with the approved remediation scheme and the site is suitable for end use (unless the local Planning Authority has previously confirmed that no remediation measures are required), prior to first occupation or use of the development.

Reason: To ensure the safe development and secure occupancy of the site.

- 33 Within six months of works commencing on any relevant Phase or building above ground floor level, and notwithstanding the approved plans, a detailed landscaping scheme relating to that Phase or building shall be submitted to and approved in writing by the local planning authority through the submission of reserved matters or of an application for approval of details reserved by condition. The scheme shall include detailed proposals for the following aspects:



- Hard landscaped areas including materials samples, level changes, informal seating and other street furniture;
- Details of boundary treatments relevant to that Phase;
- A planting scheme including species, locations and densities for all grass and shrubs. Suitable species include non-native flowering species providing foraging for pollinators and hardy herbaceous perennials;
- A schedule of proposed tree planting, including species, exact locations and tree pit designs;
- Play spaces including proposed equipment, measures to ensure child safety and to prevent conflict with vehicular traffic, maintenance arrangements and the underlying play strategy;
- Biodiversity enhancement measures as recommended in paragraphs 12.235 to 12.242 of the approved Environmental Statement Chapter 12: Ecology (Skilled Ecology Consulting Ltd/Trium, 2020)
- Details of defensible space of 1.5m depth to all habitable room windows facing onto the public realm or onto communal amenity spaces (not including windows facing directly onto deck access);
- Details of safe pedestrian and cycle routes throughout the site, including a pedestrian path between Blocks C3 and C4, ending at the boundary with Northwick Park, and a pedestrian and cycle path of at least 3m width, between Blocks D7 and D6, ending at the boundary with Northwick Park;
- Details of how vehicle access to side streets (other than the street to the south of Blocks D1 and D2) shall be restricted so as to discourage vehicle movements other than those required to access residential parking areas, to undertake waste bin collections and other essential delivery and servicing requirements, and to provide access for emergency vehicles;
- Details of how the side streets to the south of Block C1 and Block C4 would be designed so as to prioritise pedestrian and cycle movements and to provide a continuous pedestrian route and visual connection between the Hospital ring road and Northwick Park, including any necessary traffic calming measures across the main street and measures to aid wayfinding;
- Details of how the temporary amenity areas will be landscaped and managed so as to prevent the use of these for informal parking and to contribute to the amenity of residents;
- Details of the proposed arrangements for the management and maintenance of all hard and soft landscaped works other than those areas to be adopted by the highway authority.

The approved landscaping scheme shall be completed prior to the first occupation of the relevant phase of the development hereby approved, or in the case of planted elements, within the first planting season after the occupation of the development hereby approved and thereafter maintained, unless alternative details are first agreed in writing by the Local Planning Authority.

Any trees and shrubs planted in accordance with the landscaping scheme and any plants or trees which have been identified for retention within the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size and in similar positions to those originally planted.

The total number of trees planted across the site shall not be less than 387 (excluding any temporary trees) unless otherwise agreed in the discharge of this condition. Proposed street trees should be medium to large species appropriate to the size and scale of the street that can grow to full size without need of pruning. Suitable species include Birch, Cut Leaf Alder, Hornbeam, Liquidambar and Turkish Hazel. London Plane, Lime and Pyrus Chanticleer are not suitable as street trees and should not be included within this type.

Reason: To ensure a satisfactory standard of appearance and to ensure that the proposed development enhances the visual amenity of the locality, provides functional spaces and to maximise biodiversity benefits. To mitigate against the loss of trees on site and to provide for the planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

- 34 Prior to the commencement of works above ground floor level on Phase 3 of the development, further details of a Public Art Strategy, in accordance with the approved Design Code, shall be submitted to and approved in writing by the local planning authority.

Reason: In order to ensure a high quality development and facilitate the provision of public art within the site.

- 35 Prior to development commencing above ground floor level on any block or building, further details of wind mitigation measures for any residential balconies on that building that would not otherwise be expected to achieve sitting conditions in summer, shall be submitted to and approved in writing by the local planning authority. The details submitted shall be in accordance with the findings and recommendations of the approved Vol 1 Chapter 11: Wind Microclimate (Trium, February 2020) and Vol 3: Appendix: Wind Microclimate (Trium / RWDI) of the Environmental Statement and shall demonstrate that all balconies affected would be expected to achieve sitting conditions in summer following the implementation of the mitigation measures.

The mitigation measures shall be implemented fully in accordance with the approved details prior to first occupation or use of the relevant block or building.

Reason: To ensure comfortable wind speeds on residential balconies, in accordance with London Plan Policy D9.

- 36 Prior to works commencing on any building or Phase above ground floor level, further details of screening to balconies and terraces on the relevant building or Phase required to ensure adequate levels of privacy for residents shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure adequate levels of privacy for future residents.

- 37 Prior to commencement of works above grade on any building or Phase, a RIBA Stage 3 Fire Strategy relevant to that building or Phase prepared by a suitably qualified third party consultant shall be submitted to and approved by the Council. The development of that building or Phase shall be carried out in accordance with the approved Fire Strategy and retained thereafter. The requirements of the Fire Strategy shall be in compliance with Policy D12 of the London Plan and Part B of the Building Regulations.

Reason: To ensure that the risk of fire is appropriately addressed in the proposed development, in accordance with London Plan Policy D12.

- 38 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations) for any Phase, details of how the development is designed to allow future connection to a district heating network should one become available, shall be submitted to and approved in writing by the local planning authority and the development shall be completed in accordance with the approved details.

Reason: To ensure the development is in accordance with the principles of London Plan Policy SI3.

- 39 Within six months of commencement of work on any relevant building or Phase, detailed drawings showing the photovoltaic panel arrays on the roofs of the proposed buildings shall be submitted to and approved in writing by the Local Planning Authority.

The photovoltaic panel arrays shall be installed in accordance with the approved drawings and made operational prior to occupation of the development hereby approved.

Reason: To ensure that the development minimises its carbon emissions, in accordance with London Plan Policy SI2.

- 40 Prior to first use of the development, further details of external lighting, signage and wayfinding shall be submitted to and approved in writing by the local planning authority.

The details submitted shall include details of lux levels and light spillage diagrams and shall demonstrate that:

External lighting, signage and wayfinding within the site has been designed so as to aid wayfinding towards nearby destinations including Northwick Park Hospital and the University of Westminster, and so as to complement any lighting, signage and wayfinding proposals relating to the Hospital and University.

External lighting will comply with the Institute of Lighting Professionals' Guidance Note 1 for the reduction of obtrusive light (2020)

Light intrusion into greenspace areas and impacts on protected species and other wildlife will be minimised, in accordance with the recommendations of the approved Environmental Statement Chapter 12 Ecology (Skilled Ecology Consulting Ltd, 2020).

External lighting, signage and wayfinding shall be provided in accordance with the approved details prior to first use of the development.

Reason: To ensure an acceptable form of development.

- 41 Prior to first occupation or use of the commercial units in Phase 2a or Phase 4 of the development, a Frontage and Signage Strategy for the relevant commercial units, prepared in accordance with the guidance set out in the Shopfronts SPD3 2018, shall be submitted to and approved in writing by the Local Planning Authority. The Frontage and Signage Strategy shall include further details of the external appearance of the commercial units including:

- (i) A strategy for commercial unit windows which shall not be mirrored, painted or otherwise obscured; and
- (ii) a strategy for the design and position of signage and advertising including signs attached to the building fabric or free-standing within the site.

The works shall be carried out in accordance with the approved details prior to first occupation, and shall be retained thereafter for the lifetime of the development and the Frontage and Signage Strategy will apply to future tenants.

Reason: To ensure the appearance of the frontage and individual units thereof is unified and that it enhances the visual amenity of the street scene.

- 42 Prior to first occupation or use of the commercial units in Phase 2a or Phase 4 of the development, a Meanwhile Use Strategy relevant to those units shall be submitted to and approved in writing by the Local Planning Authority, and implemented in full thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason; In the interests of proper planning. To allow for alternative uses of the commercial units to be explored on a temporary basis in the event of any extended periods of vacancy.

- 43 Prior to first occupation or use of the University sports and leisure facilities proposed in Phase 4, a Community Access Plan shall be submitted to and approved in writing by the Local Planning Authority. The Community Access Plan shall allow for a minimum of 15 hours of community use each week and shall include details of rates of hire (based upon those charged at other public facilities), terms of access, hours of use, access arrangements and management responsibilities.

The approved Community Access Plan shall be brought into operation within 3 months of first occupation or use of the facilities and it shall remain in operation for the duration of the use of the development.

Reason: To secure well-managed, safe community access to the sports facility, to ensure sufficient benefit to the development of sport and to accord with Local Plan.

- 44 Prior to first occupation or use of any building combining residential and non-residential uses, a scheme of sound insulation measures shall be submitted to and approved in writing by the local planning authority. The insulation shall be designed so that noise from any proposed

non-residential unit does not adversely impact residential units. Use classes E(a), E(b) and E(f) shall not result in an exceedance of the indoor ambient noise levels specified within BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' in the residential units adjacent to the non-residential uses. The approved insulation measures shall thereafter be implemented in full.

Reason: To protect acceptable local noise levels.

- 45 Prior to installation of any plant within a relevant building or Phase, an assessment of the expected noise levels from installed plant 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 required noise levels below shall be submitted to and approved in writing by the Local Planning Authority .

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 (or lowest practicable levels) when measured at the nearest noise sensitive premises.

The plant shall thereafter be installed and maintained in accordance with the approved details.

Reason: To protect acceptable local noise levels.

- 46 Prior to first use of any commercial kitchen within the development, details of the extract ventilation system and odour control equipment for the kitchen, including all details of external ducting, must be submitted to and approved in writing by the Local Planning Authority.

The approved equipment shall be installed prior to the commencement of the relevant use and shall thereafter be operated at all times during the operating hours of the relevant use and maintained in accordance with the manufacturer's instructions.

Reason: To protect the amenity of nearby residents.

- 47 Prior to first occupation or use of a relevant building or Phase, a Car Park Management Plan shall be submitted and approved in writing by the local planning authority. The Car Park Management Plan shall set out how parking spaces within the relevant building or Phase will be allocated to those most in need, in accordance with London Plan Policy T6.1, and the development shall be operated thereafter in accordance with the approved details.

All car parking spaces relating to a building or Phase shall be provided in full accordance with the approved plans prior to first occupation of the residential units in that building or phase.

Reason: To ensure that residential car parking is provided in accordance with emerging London Plan Policy T6.1.

- 48 Prior to first occupation or use of the any building or Phase of the development, a Bird Hazard Management Plan shall be submitted to and approved in writing by the local planning authority in consultation with the Ministry of Defence, including but not limited to sufficient information to demonstrate that:

- the Phase will not contain large areas of open water,
- waste storage areas for food outlets will be managed so as to avoid the availability of food waste for hazardous birds;
- roof areas will be netted if other measures to prevent nesting of hazardous birds are unsuccessful.

Reason: To ensure compliance with the bird hazard safeguarding requirements of RAF Northolt.

- 49 Prior to first occupation or use of each Phase, a detailed Delivery and Servicing Plan relating to that Phase shall be submitted to and approved in writing by the local planning authority. For Phase 2a, sufficient details shall be submitted to demonstrate adequate servicing for commercial units and arrangements to present residential bins for collection where bin storage areas are not located within Brent's maximum collection distances.

Reason: To ensure adequate delivery and servicing arrangements for the development.

- 50 Prior to first occupation or use of the development, the following shall be submitted to and approved in writing by the local planning authority:

- confirmation from Thames Water that all surface water network upgrades required to accommodate additional flows from the development have been completed, or;
- confirmation from Thames Water that a development and infrastructure phasing plan has been agreed to allow the development to be occupied.

Where a development and infrastructure phasing plan is agreed with Thames Water, no occupation of the development shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid surface water flooding within and surrounding the site.

- 51 Prior to first occupation or use of Phase 3 of the development, the following shall be submitted to and approved in writing by the local planning authority:

- confirmation from Thames Water that all foul water network upgrades required to accommodate additional flows from the development have been completed, or;
- confirmation from Thames Water that a development and infrastructure phasing plan has been agreed to allow Phase 3 to be occupied.

Where a development and infrastructure phasing plan is agreed with Thames Water, no occupation of Phase 3 shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and / or potential pollution incidents.

- 52 Ecological monitoring

(a) Within two months of practical completion of the development (or within twelve months of practical completion of Phase 3 in the event that Phase 4 has not commenced by that time), an ecological survey of the site shall be conducted and the results submitted to and approved in writing by the local planning authority.

(b) Within two years and two months of practical completion of the development (or within twelve months of practical completion of Phase 3 in the event that Phase 4 has not commenced by that time), an updated ecological survey of the site shall be conducted and the results submitted to and approved in writing by the local planning authority.

Reason: To ensure that any harm to protected species and other wildlife is avoided or minimised during the construction process, and to assess residual ecological impacts of the development.

## INFORMATIVES

- 1 The applicant is advised that this development is liable to pay the Community Infrastructure Levy; a Liability Notice will be sent to all known contacts including the applicant and the agent. Before you commence any works please read the Liability Notice and comply with its contents as otherwise you may be subjected to penalty charges. Further information including eligibility for relief and links to the relevant forms and to the Government's CIL guidance, can be found on the Brent website at [www.brent.gov.uk/CIL](http://www.brent.gov.uk/CIL).
- 2 Adverse stacking: The layout of the flats should be designed so that rooms in different flats on different floors which are intended for similar purposes are in vertical alignment.
- 3 Brent Council supports the payment of the London Living Wage to all employees within the Borough. The developer, constructor and end occupiers of the building are strongly encouraged to pay the London Living Wage to all employees associated with the construction and end use of development.
- 4 There may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimise the risk of damage. Thames Water will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services they provide in any other way. Please read Thames Water's guide on working near its assets (at <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Wo>) to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near Thames Water pipes or other structures. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB
- 5 In relation to the conditions requiring the submission of details pertaining to land contamination, the quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality. The quality of imported soil must be verified by means of in-situ soil sampling and analysis. We do not accept soil quality certificates from the soil supplier as proof of soil quality.
- 6 The following definitions apply in respect of the planning conditions above:

#### **SubStructure**

Substructure works are defined as building foundations or underlying building supporting substructure. These exclude site preparation works.

#### **Superstructure**

Superstructure works are defined as part of the building above its foundations. These exclude site preparation works.

#### **CIL**

For the purposes of the Community Infrastructure Levy Regulations 2010 (as amended) this is a phased development. Each CIL chargeable development approved by this condition shall be considered a separate chargeable development for the purposes of calculating Community Infrastructure Levy.

#### **Phase**

A phase of development comprises a phase defined for the purposes of CIL and/or a phase defined for the purposes of the discharge of planning conditions and/or a construction phase or sub-phase, and for the purposes of discharging relevant planning obligations.

A phase can comprise site preparation works, demolition works, sub-structures, and/or buildings, plots or groups of plots.

#### **Site preparation works**

Site preparation works comprise demolition, surveys, site clearance, the erection of fencing or hoardings, the provision of security measures or lighting, the erection of temporary buildings or structures associated with the development, the laying removal or diversion of services, the provision of construction compounds.

- 7 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures they will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.thameswater.co.uk&d=DwIFaQ&c=wwXbrpLI7CCtc\\_8nujeH4Hjbo7WQnU-m40kU&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.thameswater.co.uk&d=DwIFaQ&c=wwXbrpLI7CCtc_8nujeH4Hjbo7WQnU-m40kU&e=) . Please refer to the Wholesale; Business customers; Groundwater discharges section.
  
- 8 Under the Control of Pollution Act 1974, noisy construction works are regulated as follows:  
  
Monday to Fridays - permitted between 08:00 to 18:00  
Saturday - permitted between 08:00 to 13:00  
At no time on Sundays or Bank Holidays  
  
For work outside these hours, the Control of Pollution Act 1974 allows the council to set times during which works can be carried out and the methods of work to be used. Contractors may apply for prior approval for works undertaken outside of normal working hours. They should email the noise team at [ens.noiseteam@brent.gov.uk](mailto:ens.noiseteam@brent.gov.uk) to obtain a section 61 application form. Please note that the council has 28 days to process such applications.
  
- 9 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Any person wishing to inspect the above papers should contact June Taylor, Planning and Regeneration,  
Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 2233