

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

9 December, 2020
03
20/0701

SITE INFORMATION

RECEIVED	26 February, 2020
WARD	Northwick Park
PLANNING AREA	
LOCATION	Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA13GX
PROPOSAL	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
PLAN NO'S	See Condition 2
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case <a href="https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_<systemke">https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_<systemke</p> <p><u>When viewing this as an Hard Copy _</u></p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "20/0701" (i.e. Case Reference) into the search Box3. Click on "View Documents" tab

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: Phase 1 represents Blocks C1, C2, C3 and C4, main street and associated streets and landscaping; Phase 2 represents Block B1 and associated landscaping;
4. Affordable housing: Provision of 245 affordable units comprising:
 - a. 70 units for affordable rent at London Affordable Rent levels and 26 units 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.
 - b. 38 units for affordable rent at rent levels not exceeding 80% of current market rents, and subject to an appropriate Affordable Rent nominations agreement with the NHS Trust and the Council, securing 100% nomination rights on first lets and 75% nomination rights on subsequent lets for the NHS Trust and cascaded rights for the Council.
 - c. 111 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).
 - d. In the event that the development does not commence within 24 months, 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 achievable through financial viability assessments.
 - e. 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.
 - f. 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 2.
5. Submission, approval and implementation of a Training and Employment Plan to provide opportunities for Brent residents during construction and operation stages.
6. Sustainability and energy
 - g. Detailed design stage energy assessment and initial carbon offset payment
 - h. Post-construction energy assessment and final carbon offset payment
 - i. BREEAM pre-construction assessment and post-completion certificate evidencing achievement of BREEAM 'Excellent' rating for commercial floorspace.
 - j. Commitment to connect to nearby district heat network should a suitable network become available in the future
7. Hospital energy centre & Multi-storey car park (LPA ref 19/4272) to be operational prior to commencement of works on site and retained as such
8. Submission, approval and implementation of traffic management and routing arrangements during

construction including for buses as required, securing retention of access to hospital facilities

9. Submission, approval and implementation of temporary arrangements for nursery provision during construction
10. Financial contributions:
 - k. To Brent Parks for upgrade of Northwick Park Pavilion (£500,000)
 - l. To Brent Parks for biodiversity enhancements on park edge (£10,000)
 - m. To Brent Highways for implementation of Controlled Parking Zones in the area (£200,000)
11. Residential and commercial Travel Plans to be submitted and approved prior to occupation, implemented and monitored, and parking permit restrictions to apply to all new residential units
12. Highway works to be completed prior to occupation or use of any buildings, either under reference 20/0700 or under reference 20/0677. Construction and adoption of main street through s38 agreement, connection to highway access and to PROW 100 route to Northwick Park Underground Station.
13. Feasibility study for works to upgrade Northwick Park Underground Station to be commissioned prior to material start and completed within nine months of commencement.
14. Relocation of cycle barriers in Northwick Park station subway.
15. 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. 3 years consent
2. Approved plans
3. Number of residential units and withdrawal of C3 to C4 permitted development rights
4. Quantum and use of commercial space
5. Accessible and adaptable dwellings and wheelchair user dwellings to be implemented
6. Cycle and bin storage to be implemented
7. Water consumption limitation
8. Provision of communal aerial and satellite dish system for each building
9. Non-road mobile machinery power restriction
10. Drainage strategy to be implemented as approved

Pre-commencement

11. Phasing plan
12. Construction Method Statement
13. Construction Logistics Plan
14. Construction Environmental Management Plan
15. Arboricultural Method Statement

Post-commencement

16. Relocation of T & TTT Hospital facilities
17. Contaminated land investigation and remediation
18. Details of district heating network
19. Electric vehicle charging points
20. Fire strategy
21. Materials samples
22. Landscaping scheme
23. Tree planting schedule

24. Wind mitigation measures
25. PV panels
26. Balcony screening

Pre-occupation

27. Meanwhile use
28. Lighting, signage and wayfinding
29. Frontage and signage for commercial units
30. Plant noise assessment
31. Commercial kitchen emissions
32. Delivery and servicing plan
33. Cycle storage details
34. Car Park Management Plans
35. Bird Hazard Management Plan
36. Internal noise levels
37. Sound insulation measures

Post-occupation

38. Ecological monitoring surveys

Informatives

1. *CIL liability*
2. *Party wall information*
3. *Building near boundary information*
4. *London Living Wage note*
5. *Fire safety advisory note*
6. *Tree species recommendations*
7. *Definitions of terms in respect of conditions*
8. *Any other informative(s) considered necessary by the Head of Planning*

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

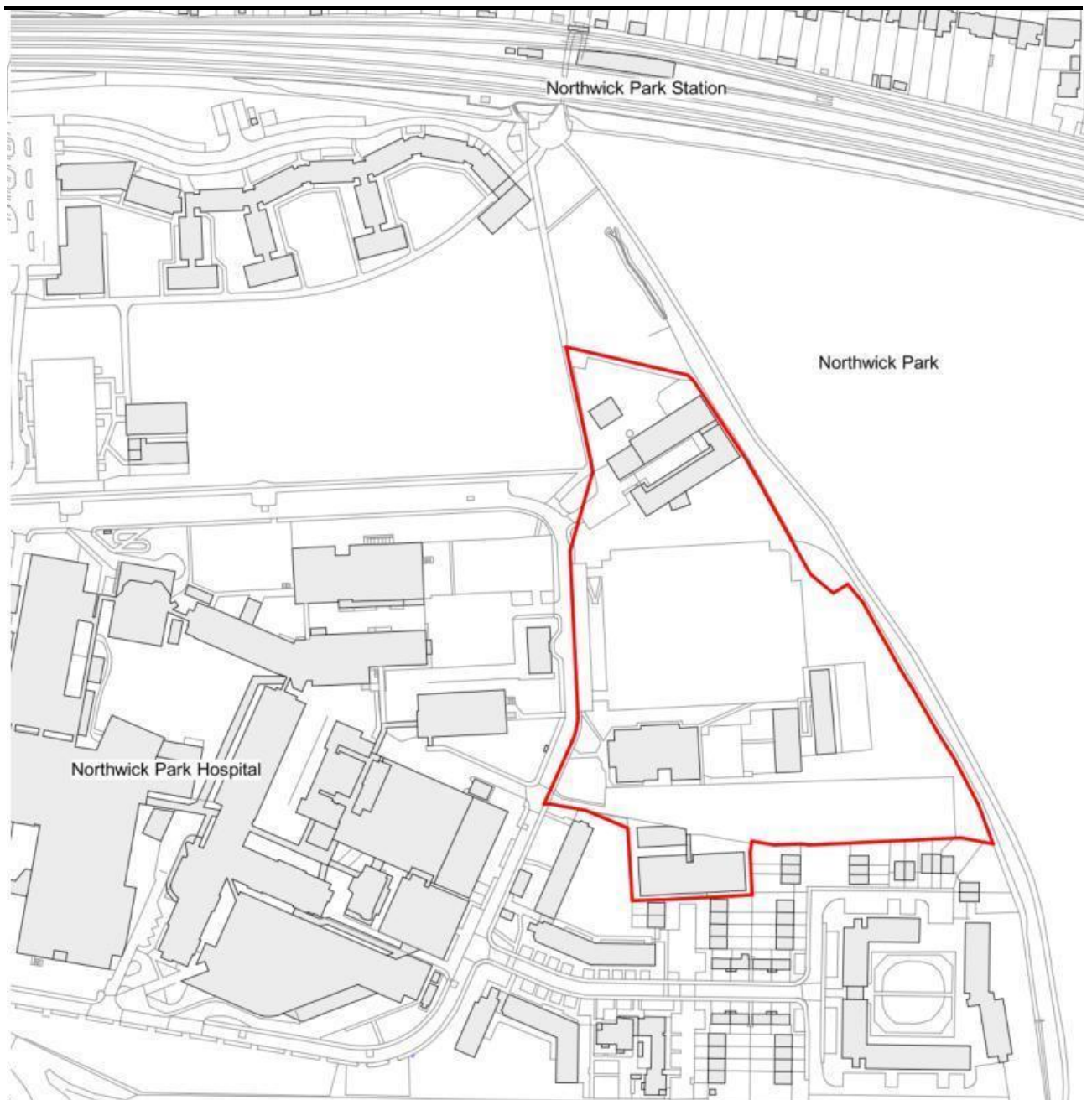


Brent

Planning Committee Map

Site address: Land adjacent to Northwick Park Hospital, Nightingale Avenue,
London, HA13GX

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This map is indicative only.

PROPOSAL IN DETAIL

All of the existing buildings would be demolished to allow for the redevelopment of the site to provide five buildings of varying sizes:

- Block B1: comprising at ground floor 1,179sqm of flexible retail floorspace (Use Classes A1 and A3) and a nursery (Use Class D1) of 408sqm in area, with 140 residential units on upper floors;
- Block C1: comprising 261 residential units;
- Block C2: comprising 83 residential units;
- Block C3: comprising 85 residential units;
- Block C4: comprising 85 residential units.

Each block would have residential cycle storage and bin storage at ground floor, and Blocks C1, C2, C3 and C4 would also have residential car parking spaces at ground floor. First floor podium gardens would be provided for each block. The total number of residential units proposed is 654.

The proposal also includes hard and soft landscaping works, including the creation of a new north-south road to adoptable standards, areas of public realm including a neighbourhood green and linear rain garden, and vehicle and pedestrian routes between the buildings.

The development is envisaged as coming forward in two phases. Blocks C1, C2, C3 and C4 would form the first phase, consisting of 514 residential units. Block B1 would form the second phase, consisting of 140 residential units in addition to the flexible retail floorspace and nursery.

EXISTING

The site comprises a roughly triangular piece of land owned by Network Homes and containing a number of buildings providing ancillary hospital facilities (a boiler house and pump room, a staff social club, a nursery and a group of single storey buildings known as 'T Block' and currently providing accommodation for occupational health staff, together with surface level staff car parking.

Vehicle access to the site is provided from Watford Road via the Northwick Park Hospital ring road, and pedestrian access is available via a public right of way to the north of the ring road, from Northwick Park station and from the Pryors Path footpath in Northwick Park.

The site is bounded by green space owned by Brent Council to the north, the eastern section of the Hospital ring road and the main Hospital buildings to the west, Northwick Park to the east and residential properties to the south. The site, the Brent Council land and the residential properties all form part of the related outline application site (ref 20/0700).

The application site is not in a conservation area and does not contain any listed buildings. It does however contain areas of land that are liable to surface water flooding and part of the land to the east of the staff car park and nursery is designated as open space. The Brent Council land and Northwick Park are designated as Metropolitan Open Land.

AMENDMENTS SINCE SUBMISSION

Amended plans were received on 20 November 2020, showing minor changes to the layouts of residential units in response to comments from officers. These did not fundamentally alter the nature of the scheme, and did not require a further period of consultation.

SUMMARY OF KEY ISSUES

The key planning issues for Members to consider are set out below. Five 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: Five 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 (654 new homes), together with small scale commercial units to serve local needs and a replacement nursery. A small area of protected open space would be replaced by more substantial areas of landscaped public open space.

The loss of other existing uses 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 £500,000 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 245 new affordable homes (comprising 70 units for London Affordable Rent, 38 intermediate rent units, 26 units at London Living Rent and 111 shared ownership units). This represents 39% affordable housing by habitable room, and the London Affordable Rent units in particular would be weighted towards family-sized homes. The applicant's Financial Viability Appraisal 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. 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 London Affordable Homes, 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. Whilst the overall proportion of family-sized homes do not comply with Brent's adopted or emerging policies in this respect, officers acknowledge that these requirements would further undermine the viability of the scheme and compromise its deliverability in this particular instance.

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 residential windows is considered to be minimal within the context of the overall scale and density of the scheme. 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 five buildings arranged in a coherent and legible layout, providing focal points, active frontages, gateways and different character areas to create a sense of place for the new community. Building heights would step down towards the boundary with Northwick Park and neighbouring housing, and are considered to be appropriate within the surrounding context. The architectural approach and materials would contribute towards a high quality development.

Residential living standards: The proposal would provide 654 new homes to comply with or exceed all relevant policies and standards, including a high proportion of dual aspect homes. A range of communal amenity spaces would be provided in addition to private balconies for all units, and notwithstanding a small shortfall against Policy DMP19 standards for some buildings, these would offer a high quality and variety of experiences including various play spaces, and would be supplemented by 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 44 trees on site, although none of these are of high quality. Trees along the boundary in Northwick Park would be protected and retained, and approx 208 new trees would be planted within the scheme to mitigate the loss of existing trees. The removal of trees and disturbance caused by construction work would lead to the temporary loss of habitat for birds and other wildlife but this would be compensated for by new tree planting and by a financial contribution of £10,000 towards off-site biodiversity enhancement measures. Further information on Urban Greening has been sought, but the proposal is considered to significantly 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 achieve a 39% reduction in carbon emissions for the residential development and a 49% reduction for the commercial element. This exceeds the on-site target reduction set out in London Plan Policy 5.2, and a contribution to Brent's carbon offsetting fund, estimated to be £671,910, 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.

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 this would also deliver wider highway benefits. Access arrangements are not included in this application but would be secured through the s106 agreement. The road layout within the site would be designed for minimal vehicle traffic with a high quality environment for pedestrians and cyclists, and residential parking would be provided at a rate of 0.11 spaces per home. 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 a feasibility study would be secured through the s106 agreement to identify options for increasing capacity and providing step-free access at the station. Financial contributions towards station works and improved bus services would be secured against later stages of the associated outline application reference 20/0700.

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	3082	0	3082	412	-2670
Shops	0	0	0	1178	1178

Monitoring Residential Breakdown

Description	1Bed	2Bed	3Bed	4Bed	5Bed	6Bed	7Bed	8Bed	Unk	Total
EXISTING (Flats û Market)										
EXISTING (Flats û Social Rented)										
EXISTING (Flats û Intermediate)										
PROPOSED (Flats û Market)	139	223	47	0	0	0	0	0	0	409
PROPOSED (Flats û Social Rented)	12	12	44	2	0	0	0	0	0	70
PROPOSED (Flats û Intermediate)	60	92	14	9	0	0	0	0	0	175

RELEVANT SITE HISTORY

Related applications

20/0700. Outline Permission. Pending. _

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 units 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 units;

-up to 50,150m² 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

20/0677. Full Planning Permission. Pending. _

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.

Previous applications within the site

The Hospital has been significantly altered and extended over the years. The following applications relate to development within the application site:

15/0516. Full Planning Permission. Granted. 19.06.2015.

Continued use of the single storey children's creche (Use class D1) with associated play area and perimeter fencing located adjacent to hospital car park.

15/0199. Full Planning Permission. Granted. 24.12.2015.

Erection of sub-station and installation of electrical generator with associated fuel storage tanks and security fencing on land located between the existing Social Club and Nursery.

12/3074. Full Planning Permission. Granted 22/05/2013.

Erection of an oxygen storage compound adjacent to P Block.

12/2734. Full Planning Permission. Granted 30/11/2012.

Erection of three new 22m boiler flues at the main boiler house at Northwick Park Hospital. The flues serve three combined oil and gas boilers which are to be refurbished and fitted with economizers which will save energy and reduce emissions.

09/2608. Full Planning Permission. Granted 23/02/2010.

Demolition of existing creche and erection of a single storey creche with associated play area and perimeter fencing adjacent to hospital car park

Previous applications within the Hospital grounds

The following applications relate to development elsewhere within the Hospital grounds:

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.

19/4011. Full Planning Permission. Granted. 05/02/2020.

Relocation of MRI portcabin from rear of block Q to adjacent block K and a ground floor extension to Block Q.

16/4838. Full Planning Permission. Granted. 10/01/2017.

Erection of a single storey building for use as a shop (Use class A1) located by the main entrance to the A&E.

16/4780. Full Planning Permission. Granted. 05/01/2017.

Erection of external link walkway to front of Q block and associated internal works as temporary accommodation to house MRI scanning and patient waiting.

14/4508. Full Planning Permission. Granted. 25/02/2015.

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

13/1842. Full Planning Permission. Granted 21/08/2013.

Erection of a single storey building to house a high voltage intake room near Block U and the main ring road.

13/0728. Full Planning Permission. Granted 22/05/2013.

Construction of a new medical oxygen storage and supply compound near Block K and the MRI unit.

12/1615. Full Planning Permission. Granted 15/05/2014.

Demolition of existing single storey building and the erection of a part 1, part 2 and part 3 storey building in order to provide a new accident and emergency department on land adjacent to blocks G and E of Northwick Park Hospital. Proposal includes a partial realignment of the existing site access road the creation of new access roads, new ambulance and public drop off areas, pedestrian ramps and footpaths, plant room, new retaining walls and landscaping, and subject to a Deed of Agreement dated 13th May 2014 under Section 106 of the Town and Country Planning Act 1990, as amended.

11/2127. Full Planning Permission. Granted 14/11/2011.

3-storey extension and alterations to Block J to provide new operating theatres and associated plant room. Work includes building an undercroft over existing parking area and subject to a Deed of Agreement dated 14th November 2011 under Section 106 of the Town and Country Planning Act 1990, as amended

10/3171. Full Planning Permission. Granted 01/04/2011.

Erection of 3 electrical substations, an electrical intake building and roof mounted chillers to hospital site.

There have been various further historic planning applications relating to the hospital site itself, which do not directly relate to the application site.

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. 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.

An objection was received from Cllr Perrin on the grounds of impacts on trees and ecological interests. These issues are covered in paragraphs 149 - 166 of the main report.

A total of nine objections from individual households have been received. The grounds of objections received refer to the following issues:

Comment	Officer response
Principle of Development	
Development on Greenbelt land	The designated Metropolitan Open Land (MOL) land would not be developed as a result of this planning application.
Loss of green space	The proposal would replace existing designated open space and provide high quality amenity space along with new public realm.
Loss of homes. Wrong to demolish recent development (Network Homes accommodation).	The proposal would not involve demolition of existing housing, which is proposed as part of a later stage in the outline proposal ref 20/0700.
Impact on character of surrounding area	
Issue with scale of development and that there is an existing shopping parade within close	The scale of development is considered appropriate in this location and the additional

proximity	retail units would be of a small scale to serve the local needs of the increased population.
Whilst the new blocks are well designed they will be higher than existing developments in the area, and have a visual impact at Northwick Park and residents on other side of railway line.	The proposed heights are considered to be in keeping with the height of the main Hospital and University buildings, and to make best use of the available land. The visual impacts on neighbouring residential areas have been assessed in the Townscape & Visual Impact Assessment. Please refer to the Heritage, townscape and visual impacts section of the report.
Affordable housing and housing mix	
Increased accommodation cost	Affordable housing would be secured through a S106 agreement. Please refer to affordable housing section of the report.
NHS Key worker displacement	The proposal would provide keyworker accommodation for staff working at Northwick Park Hospital. Please refer to affordable housing section of the report.
Transport considerations	
Increased traffic and parking demand	The application demonstrates that there would be no significant impacts arising from the development so as to result in undue harm in respect of traffic congestion or parking demand. Please refer to the transport section of the report for further details.
Additional traffic to the area and lack of parking for construction workers	A construction logistics plan will be secured as part of a condition to any forthcoming consent. This will include measures to promote non-car access to the site for construction workers.
Environmental health considerations	
Increased construction noise, pollution and dust	<p>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. Conditions would be attached in line with standard practice.</p> <p>Construction works and traffic would be managed through a construction management and logistic plan. Please refer to Environmental health section of the report for further details.</p>
Ecology and biodiversity	
Loss of trees/wildlife/habitat	An Environmental Statement has been submitted with the application to demonstrate that there would be no significant impacts arising from the development so as to result in undue harm in respect of trees, wildlife, or habitat. Please refer to the Ecology and biodiversity section of the report for further details.
Flood risk and drainage	
Flood risk assessment does not adequately address the area as it is subject to regular	Local records show areas of the site and surrounding area are affected by surface water

flooding	flooding, which is not monitored by the Environment Agency but by the Local Lead Flood Authority (LLFA). The LLFA have been consulted and consider that the proposal would deliver significant improvements in this respect.
Other	
No consultation on planning application	Publicity was carried out in accordance with the Council's statutory duty. Neighbour consultation letters were issued, ten site notices were erected and an advertisement was placed in the local paper.
Brent consultee comments are not publically viewable	Internal consultee comments are discussed below, and in greater detail in the report.
Area is being transformed by outside developers for profit	Developer profit is not a material planning consideration.

External and statutory consultees

Greater London Authority (GLA) and Transport for London (TfL)

The GLA Stage 1 response states that the application does not fully accord with the London Plan and the Mayor's Intend to Publish London Plan, although possible remedies are identified that could address this:

- **Principle of development:** The proposed optimisation of the site and the contribution to housing targets is supported. While the proposed 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.
- **Affordable housing:** The proposals comprise 39% affordable housing by habitable room subject to grant funding, with a 28/72 tenure split, in favour of intermediate housing. The submitted viability information is being scrutinised to ensure the maximum quantum and affordability of affordable 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 under separate cover to be addressed in their entirety.
- **Water efficiency:** Water efficiency information should be provided for the residential and non-residential components on the development.
- **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.

Transport for London (TfL) also provided more detailed comments:

- Secure the provision of car parking, EVCP provision, disabled parking fully in line with London Plan car parking standards.
- Secure the implementation of Car Park Design and Management Plan; and impose restriction to exempt further residents from applying for local CPZ permits.
- Secure the design and approval of cycle parking fully in line with the London Plan cycle parking standards and London Cycle Design Standards (LCDS).
- Continue to work with TfL on reviewing local highway capacity impact assessment.
- Secure adequate bus stops/ bus stands on site as well as contribution toward increase service capacity.
- Continue to work with TfL/ London Underground to develop and deliver mitigation to address station capacity issues on Northwick Park Station.
- Continue to work with local council to deliver local pedestrian, cycling and public realm improvements considering the outcome of the ATZ assessments.
- Review the Framework Travel Plan considering the comments made and secure the final submission of detailed Travel Plans for all parts of the proposals.
- Review the proposed servicing arrangement to enable off-street servicing where possible; and secure the detailed submission of DSP.
- Secure the submission and implementation of Construction Logistics Plan (CLP), produced in line with latest TfL's CLP guidance.

The applicant has responded to the issues raised by the GLA within the Stage 1 response and additional comments from TfL, and these issues have been discussed within the relevant sections of this report.

University of Westminster

No objection. The reasons for supporting the scheme include the provision of education and employment opportunities, housing, public realm improvements, and creation of new community environment.

London Borough of Harrow

No objection. Following recommendations made:

- Height of the proposed taller buildings should be reduced to limit impact and intrusiveness into open views out from Harrow on the Hill as it could undermine the open setting of the Hill by having a group of relatively tall buildings in close proximity to it.
- It would be helpful to have some of the protected views out from the Hill marked up to enable fuller analysis.
- A contribution towards the associated costs of an investigation and possible implementation of controls is required.
- Compensatory flood storage and flood resilience information for the construction of the buildings to be provided.

These issues are discussed in the relevant sections of the report.

NHS (Clinical Commissioning Group)

No objection. NHS Trust advised that any future redevelopment of the Hospital site would not be impacted by releasing adjoining land for housing. The Trust are able to develop the site in the future in a pragmatic way. Further clarification and detail was sought regarding the following matters:

- Further detail of public routes through to Northwick Park Tube station required, improved signage and safe route identified for patients who walk to the station.
- Any CIL funding obtained should be earmarked for London North West University Healthcare NHS Trust development of Northwick Park hospital.
- Any new retail units within the development should complement those already provided at the hospital.
- Clarification requested regarding proposed keyworker accommodation for staff working at Northwick Park Hospital.

The applicant has responded to the issues raised by the NHS and these issues have been discussed within the relevant sections of this report.

Sport England

No objection. Recommends use of CIL funding to deliver new and improved facilities for sport to address the

sporting needs arising from the development and needs identified in Brent's Infrastructure Delivery Plan.

Ministry of Defence

No objection. Recommend that conditions are attached related to bird nesting and refuse provision.

Secure by Design officer

Concerns during pre-application process regarding relocation of sports pavilion, which is no longer proposed. Advice provided on layout of site and other issues, which have been addressed in the proposals submitted.

Environmental Health

No objection subject to conditions to secure Construction Method Statement, control of Non Road Mobile Machinery emissions, Internal Noise Levels, Plant Noise Levels, Contaminated Land Investigation, Remediation and verification, Lighting scheme, Extract ventilation system and odour control equipment

Parks Service

No objection subject to financial contributions to upgrade of Northwick Park Pavilion and biodiversity enhancement within Northwick Park. These matters are discussed within the main body of the report below.

Sustainability and Energy

No objection subject to conditions and s106 obligations.

Lead Local Flood Authority

No objection. The proposal would include sustainable drainage measures, reduce run-off rates and contribute to reducing flood risk in the wider area.

Environment Agency

No comment.

Thames Water

No objection. Recommend that conditions are attached related to drainage infrastructure.

Community Involvement

A Statement of Community Involvement (SCI) has been submitted, providing details of the community engagement undertaken by the applicant to inform the application proposals. In accordance with the NPPF and Brent's adopted Statement of Community Involvement, the approach to engagement has been tailored to the nature of the development proposed. This has exceeded the minimum recommendations of the Brent SCI, and full details are provided within the submitted SCI and Design and Access Statement.

Consultation with the local community included public consultation events held in June and October 2019, in the form of exhibitions including information boards and a scale model of the proposals. The events were open to the wider community and public in the area, members, and staff from the hospital, the university, and existing residents. Due to the large number of potentially affected community groups the project team held a dedicated stakeholder drop in event in addition to the public consultation events. Existing residents of the wider outline site, who are Network Homes' tenants, with many also being employed by the Trust, were among the first to hear about the proposals, and were invited to an additional consultation event held a day ahead of the stakeholder consultation event.

A website for the development was also created at www.NorthwickParkOPE.com, providing contact details to allow residents and other stakeholders to get in touch to ask questions and make comments, especially for those who were unable to attend the public consultation events.

Phase 1 of the public consultation comprised four drop-in events held at the Northwick Park Hospital Social Club from 25 – 29 June 2019 to avoid public holidays and school holidays. Letters of invitation were sent to 6,159 residential properties including existing residents on the outline site and local businesses, and key community groups, Councillors and MPs were also invited. An advertisement promoting the public consultation events was placed in the 20 June edition of the Harrow and Kilburn Times. The project team worked with LB Brent's social media team to further promote the public consultation events online. The project website, which was included on the resident invitation, provided details of the public consultation events and an online map to find the venue. In total 244 individuals attended these events.

Phase 2 of the public consultation again comprised four events at the Northwick Park Hospital Social Club, held between 9 – 12 October to avoid public and school holidays. Local residents and businesses were again

invited by letter, and emails were sent to the same key community and political stakeholders and to those who provided e-mails at the phase 1 consultation events. Another advertisement was placed in the 4 October edition of the Harrow and Kilburn Times. Again, the project website, which was included on the invitation, provided details of the public consultation events and an online map. In total 149 individuals attended consultation events in phase 2.

The applicant has also held formal pre application consultation with Brent officers and the GLA, and has engaged widely with other stakeholders. The proposals have also been informed by Design Reviews by the Centre for Architecture and the Built Environment (CABE); an independent and impartial process for evaluating the quality of significant developments to ensure the highest quality of development.

POLICY CONSIDERATIONS

For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Development Plan in force for the area is the 2010 Brent Core Strategy, the 2016 Brent Development Management Policies DPD, the 2011 Site Specific Allocations DPD and the 2016 London Plan (Consolidated with Alterations since 2011).

London Plan 2016

2.6	Outer London: vision and strategy
2.8	Outer London: transport
2.18	Green infrastructure: the multi-functional network of green and open spaces
3.3	Increasing housing supply
3.4	Optimising housing potential
3.5	Quality and design of housing developments
3.6	Children and young people's play and informal recreation facilities
3.7	Large residential developments
3.8	Housing choice
3.9	Mixed and balanced communities
3.10	Definition of affordable housing
3.11	Affordable housing targets
3.12	Negotiating affordable housing on individual private residential and mixed use schemes
3.13	Affordable housing thresholds
3.15	Coordination of housing development and investment
3.16	Protection and enhancement of social infrastructure
5.2	Minimising carbon dioxide emissions
5.3	Sustainable design and construction
5.5	Decentralised energy networks
5.6	Decentralised energy in development proposals
5.7	Renewable energy
5.9	Overheating and cooling
5.10	Urban greening
5.11	Green roofs and development site environs
5.12	Flood risk management
5.13	Sustainable drainage
6.3	Assessing effects of development on transport capacity
6.7	Better streets and surface transport
6.9	Cycling
6.10	Walking
7.1	Lifetime neighbourhoods
7.2	An inclusive environment
7.3	Designing out crime
7.4	Local character
7.5	Public realm
7.6	Architecture
7.7	Location and design of tall and large buildings
7.8	Heritage assets and archaeology
7.13	Safety, security and resilience to emergency
7.14	Improving air quality
7.17	Metropolitan Open Land
7.18	Protecting open space and addressing deficiency

7.19	Biodiversity and access to nature
7.21	Trees and woodlands

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
CP17	Protecting and Enhancing the Suburban Character of Brent
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
DMP18	Dwelling Size and Residential Outbuildings
DMP19	Residential Amenity Space

Furthermore, the council is currently reviewing its Local Plan. Formal consultation on the draft Brent Local Plan was carried out under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 between 24 October and 5 December 2019. At its meeting on 19 February 2020 Full Council approved the draft Plan for submission to the Secretary of State for examination. 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.

The draft London Plan has recently been subject to an Examination in Public, and is at the intend to publish stage.

These documents collectively carry increasing weight in the assessment of planning applications as they progress through the statutory plan-making processes. Relevant policies are:

Draft New London Plan (Intend to Publish Version) 2019

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
H10	Housing size mix
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

Draft Local Plan (Regulation 19 version)

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
BH13	Residential amenity space
BSI1	Social infrastructure and community facilities
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:

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. An outline planning application has been submitted for the redevelopment of a larger site also including land parcels owned by the University of Westminster, the NHS Trust and Brent Council (ref 20/0700), of which the proposed development would form Phases 1 and 2a. A full planning application has 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) and these access arrangements are also included as part of the outline application. The three applications are complementary and would be linked together through an overarching s106 agreement.
2. The application is made on behalf of Network Homes, one of the four landowners working together under the One Public Estate programme to redevelop the outline site.

Environmental Impact Assessment

3. 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 paragraphs
Air Quality	185 - 187
Built Heritage	65 - 88
Climate Change	39, 147, 165, 181, 192, 248
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	89 - 103. Solar glare has not been assessed for this application due to the distance of the site from the railway line.
Ecology and Biodiversity	157 - 168
Health; Noise and Vibration	191 - 193
Socio-Economics	35 - 39
Townscape and Visual Impact Assessment	65 - 88
Traffic and Transport	196 - 248
Wind Microclimate	147 - 150

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4. 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

Residential-led development and delivery of proposed Growth Area

5. The site is part of the proposed Northwick Park Growth Area 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, together with existing residential accommodation to the south of the site and the University campus, and the Growth Area allocation is intended to stimulate improved Hospital and University facilities, a replacement sports pavilion and a small amount of commercial floorspace in addition to new housing.
6. The application would provide 654 new homes, together with retail floorspace in Use Class E (formerly Use Classes A1/A2/A3) and a nursery to replace the existing facility on the site. Road access from Watford Road via conversion of part of the existing Hospital ring road system into a two-way spine road is proposed as part of the outline application but also independently under the application ref 20/0677, and completion of this access to adoptable standards prior to occupation or use of this application would be secured through the s106 agreement.
7. 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. However, it is noted that substantial numbers of Build to Rent properties are being provided in more central parts of the Borough. In this case the application site has been acquired by Network Homes, a registered provider of social housing, with a view to redeveloping it for housing. Therefore it is not considered necessary to encourage housing delivery by requiring Build to Rent housing, whilst the proposed mix of tenures across this site and the outline application site (including student accommodation) is considered to provide an adequate range of housing types to suit the location. However, an element of Build to Rent accommodation could be proposed as part of the outline application under reserved matters.
8. Brent's emerging Policy BH8 also seeks at least 10% of additional dwellings in Growth Areas to be delivered as specialist older people's accommodation. This policy can be given some (albeit limited) weight at present). Whilst this form of housing is not proposed within the application, it is recommended that an assessment of the specific local need for this form of accommodation is provided as part of reserved matters for the outline application site and that appropriate proposals for such accommodation are made at that stage.
9. The outline application submitted in parallel with this application also seeks permission for the redevelopment of this site, which forms Phases 1 and 2a of the outline application (Phase 1 being Blocks C1, C2, C3 and C4 as proposed in this application, and Phase 2 being Block B1 in this application). However, the outline application, if granted permission, would be subject to a further stage of detailed plans being submitted and approved under reserved matters before development could proceed. This application, in effect, could be seen as comprising the reserved matters stage for these two phases of the outline application. However this application could also be implemented independently of the outline permission.
10. The residential-led redevelopment of the site would aid regeneration by intensifying currently under-used public land and would assist in boosting housing supply and is supported in principle by the Growth Area designation, subject to acceptable means of access being provided and other material planning considerations.

Proposed retail uses

11. 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.
12. The proposal would include 1,372sqm of flexible retail floorspace, which would be provided as four separate units within the ground floor of Block B1. These are identified on the plans as being a 'gastro-eatery' restaurant, a café, convenience store and retail unit and, whilst other permutations could also be provided, the landscaping proposals for this and the outline application site envisage the area to the north of the building being used for outdoor seating to support the restaurant / café use. This area would look onto the Brent triangle land, which is proposed to be relandscaped to include a play area as phase 2b of the outline application proposals. The combination of outdoor seating and commercial frontages would activate the streetscene and provide a focal point for residents and visitors at the junction of the proposed spine road, the main street through the development and the pedestrian route from Northwick Park station.
13. 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.
14. The quantum of retail floorspace proposed is considered to be appropriate to serve the local needs of the new 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.

Loss of existing uses on site

15. The proposed Growth Area site allocation envisages the comprehensive redevelopment of the site as described above. This establishes the principle that existing uses on site would be reprovided within the development where necessary and that the loss of other uses can be accepted in order to facilitate the development. However, a brief summary of the uses that would be lost is given below.
16. The proposal would lead to the loss of 594 staff car parking spaces serving Northwick Park Hospital, located in the surface level parking areas on the site. However, parking for Hospital staff will be reprovided in a new multi-storey car park 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 and was under construction at the time of the officer's site visit in August 2020). The provision of the new car park prior to redevelopment of this 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 will cease from 1 March 2021, regardless of any redevelopment proposals that may be approved. The number of parking spaces available to the Hospital will be reduced overall as a result of the consolidation of parking areas approved under reference 19/4272, and this was considered to be acceptable in the context of encouraging more sustainable modes of transport. Wider parking impacts of the proposed development are considered in paragraphs 204-211 of this report.
17. The boiler house and ancillary facilities on the site are in the process of being decommissioned. A new energy centre to serve the Hospital was also part of the proposals approved under reference 19/4272, and a further application for the installation of the necessary plant and equipment is currently under consideration (reference 20/3152). Consequently there is no objection to the demolition of the boiler house and ancillary facilities.
18. 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 BSI1 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.

19. A string of single-storey temporary buildings known as T Block / TTT 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, however further information to clarify how they would be relocated within the main Hospital buildings would be required by condition.

Reprovision of nursery

20. 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.
21. 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.
22. 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.
23. 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.
24. The proposed nursery would have a total floorspace of 447sqm, with 350sqm of external play space adjacent to the Park boundary, and would cater for 90 children (full-time equivalent). 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 the detailed application would, over time, create a new population of 1,395 residents including 127 under fives. 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 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.

25. 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 on site or a new development within the Hospital grounds or a proposal made under reserved matters for one of the remaining phases of the outline application site.
26. To maintain continuity of provision during the construction phase, it was originally intended that a separate application would be made for a temporary nursery within the University campus. However, the impact of Covid 19 means that this proposal would not be financially viable at this time. Instead, it is recommended that alternative arrangements are secured through the s106 agreement. Further details would need to be submitted and approved prior to demolition of the existing nursery, including a survey of existing and projected future demand amongst Hospital staff and other users of the existing nursery, discussion of options for temporary nursery provision within the Hospital or University grounds, and detailed examination of the spare capacity available amongst local providers and the convenience of accessing these in terms of pedestrian and other transport links.

Provision of community facilities

27. Core Strategy Policy CP23 protects existing community uses (subject to a number of detailed policy tests) and requires new community floorspace to be provided as a part of major developments, at a rate of 350sqm per 1000 new population. Brent's emerging Policy BS11 sets out detailed criteria for new community facilities but does not require any specific on-site provision to support new developments, and neither does the proposed site allocation identify a need for on-site community facilities to be provided as part of the delivery of the Growth Area.
28. Providing a new or enhanced Northwick Park Pavilion is a key priority of the proposed site allocation and Policy BP4 Northwest. To respond to this, during the evolution of the proposals for the outline site, it was originally intended that the Pavilion would be replaced by a new larger multi-functional building located on the Brent triangle of land within the site. This formed part of the proposals in Phase 1 of the applicant's public consultation programme, however, some local community groups, key stakeholders and members of the public expressed reservations about the plans to relocate the pavilion. Furthermore, the proposal for a larger building that might include a number of other uses unrelated to the recreational use of the park could potentially be inappropriate on this site, which shares the designated Metropolitan Open Land designation of the Park. 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.
29. The application proposal does not include any designated on-site space for community meetings. However, the proposed retail and restaurant uses would provide some scope for social interaction between residents, as would the landscaped open spaces and the nursery, for example the latter could potentially also host activities for older children or parents' meetings. Brent's Spacebook online directory of community facilities also identifies nine other community spaces available within a 3km distance, including Kenton Hall which has capacity for 300 people. Whilst the GLA has recommended securing the use of the nursery for other community uses out of nursery hours, it is considered that this is likely to be impractical given the layout and facilities needed for the nursery and would be potentially problematic in terms of management and security.
30. The existing pavilion building is dated and in a poor state of repair and, although sports changing facilities are well used, the communal hall and bar is not. Taking into account local support for retaining the pavilion in its existing location, it is proposed that the applications would secure a significant financial contribution towards its comprehensive refurbishment and upgrading. Further funding towards these works could be sought through the Community Infrastructure Levy as they would also benefit existing residents in the surrounding area, not only enhancing facilities for users of the sports facilities in the Park but also providing space for a wide range of other community activities a short distance away from both the new development and from existing residential communities. Funding from the Council's carbon offsetting fund could also be used, to which this development would contribute. A contribution of £500,000 from this application has been agreed with the applicant, and further contributions would be

secured against the outline application.

31. As the outline application would entail a significant increase in the resident population, the need for additional community space on site would be reviewed during the reserved matters stage, when provision could be made in either the residential or the University part of the outline site.

Impact on protected open space

32. Brent's Policy CP18 designates areas of open space within the borough and seeks to retain these, protect them from inappropriate development and enhance their use for recreational and amenity uses. 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.
33. The existing site contains a small area of protected Open Space, part of a grassed embankment on the boundary with the Park. This is approx 2,900sqm in area, but is not maintained, does not provide any sports or play equipment and is largely inaccessible to the public due to the steep gradient, dense scrub and overgrown vegetation. The function of this space is not clear and, due to its location, physical features and close proximity to similar grassed areas in Northwick Park, it does not invite public use.
34. The proposal would provide approx 4,767sqm of open space which would be landscaped to provide an attractive setting for the residential development, and would be provided for public recreation and enjoyment. This would include a linear park and rain garden running north-south through the development alongside the main street, a neighbourhood green and an enhanced entrance to Northwick Park, and would be additional to private communal amenity space provided for residents and dedicated external space provided for the nursery. In terms of this application, the amount of open space provided would significantly exceed the amount lost. Consequently the impact on open space is considered to be acceptable.

Wider impacts of the development

35. The proposal has been formulated in parallel with an outline application for the wider site, to ensure that the delivery of this part of the wider site would not compromise other parts coming forward in an acceptable manner in later phases. The NHS Trust and University of Westminster 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.
36. 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 270 jobs per year, the construction workforce spending £7.8m locally over the construction period. The new population is forecast to be 1,395 people in total, and this is estimated to generate £10.3m of local residential expenditure per year.
37. 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 (south west). 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. GP practices in the area have existing capacity constraints which would be made worse by the new demand generated by residents and it is expected that an element of CIL funding would be directed towards improving this situation, although Northwick Park A & E department performs well in relation to national targets and so is assumed to have few constraints. 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.
38. 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.

39. 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

40. The proposal would respond well to the aims of the proposed Growth Area site allocation. It would make a significant contribution to Brent's housing targets and would provide small scale retail and restaurant uses to serve local needs. A replacement nursery would be provided, with capacity to cater for additional demand from the development. The loss of other existing uses on site is considered to be acceptable in this instance, and a contribution to the refurbishment and upgrading of Northwick Park Pavilion would be secured to mitigate the lack of community floorspace provided 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

41. 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). Policy DMP15 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.
42. 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.
43. The emerging London Plan (Intend to Publish Version) 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.
44. 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.
45. 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.
46. The draft London Plan is at a more advanced stage than Brent's emerging Local Plan and has been subject to comments from the Planning Inspectorate. Whilst concerns have been raised about some London Plan draft policies by the Inspectorate, none of those concerns relate to these policies and it can therefore be considered that these draft policies carry reasonable weight at this stage. 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	
Emerging London Plan	Greater weight	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	

Assessment of proposal

47. The application proposes 39% affordable housing by habitable room, comprising 245 affordable housing units in the following mix of tenures:

London Affordable Rent	70 units	11%
Intermediate rent (80% of local market rents)	38 units	6%
London Living Rent	26 units	4%
Shared ownership	111 units	17%
Total affordable	245 units	37% by unit, 39% by habitable room
Market housing	409 units	63% by unit
Total	654 units	100%

48. The applicant's financial viability appraisal establishes a benchmark land value (BLV) of £9.5m, and shows that the scheme is in deficit by £17.3m. 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 including 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 mechanism.
49. In terms of tenure mix, the 70 London Affordable Rent units would be considered to be genuinely affordable whereas the other tenures would all be classified as intermediate products for middle-income households. The tenure split would be 34 : 66 in favour of intermediate units (by habitable room, or 28 : 72 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.
50. Network Homes have confirmed that staff currently occupying properties to the south of the site include 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. 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.

Council's review of proposal

51. The FVA was reviewed on behalf of the Council by BNP Paribas. They concluded that in all the scenarios tested, the scheme was in a financial deficit and that the proposed affordable housing offer

represented 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	- £7.65m	£8.64m	- £16.29m
Yes	£1.01m	£8.64m	- £7.63m

52. Further sensitivity testing was carried out to assess the impact of increasing the proportion of low cost rented products such as London Affordable Rent within the scheme. This exercise demonstrates a Residual Land Value of £8.77m which results in a small surplus of approx £0.13m against the Benchmark Land Value of £8.64m. The scheme could deliver a headline figure of 12% affordable housing by unit at a policy-compliant tenure mix of 81 : 19 in favour of more affordable products. This would deliver 64 x London Affordable Rent units and 15 x intermediate units (all located in Block C1). Alternatively, a 70/30 split could be achieved if the units were more widely dispersed through the different cores (notwithstanding the management issues this could raise) and this would result in a slightly higher headline percentage but fewer London Affordable Rent units. Therefore, the sensitivity testing has concluded that the scheme is delivering above the maximum reasonable amount of affordable housing. The scheme can not viably deliver more than the 70 London Affordable Rented homes proposed and the applicant has chosen to provide additional intermediate homes to achieve an overall higher headline figure.
53. Given the scale of the scheme and the overall delivery time, mid-stage and late-stage reviews would be required to capture any potential growth, and these would be secured through the s106 agreement. It is noted that Blocks C1, C2, C3 and C4 are intended to form the first phase of the development, and Block B1 the second phase. It is proposed that site-wide mid-stage viability appraisals should be required at two stages in the development of the site: prior to occupation of 70% of units in Blocks C1, C2, C3 and C4, and again prior to commencement and prior to occupation of 70% of the units in Block B1. 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 Block B1, with any surplus identified being secured as a financial contribution towards affordable housing in the borough or provided as additional affordable housing within Phase 3 of the outline application site 20/0700. The two applications would be linked via s106 agreements to ensure that these obligations are captured appropriately.

Housing mix

54. The housing mix proposed is 211 x 1bed or studio units, 327 x 2bed, 105 x 3bed and 11 x 4bed (17.8% family sized units). Whilst this does not comply with the 25% target for family-sized dwellings set out in Policy CP2, draft Local Plan Policy BH6 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 mainly family-sized units, to meet a specific Brent need for this type of housing ((44 of these new homes would be 3beds and two would be 4beds). It is considered that providing a greater number of family sized units would further compromise the viability of the scheme and hence the delivery of affordable housing, potentially undermining the delivery of 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 MOD safeguarding zone

55. The Ministry of Defence (MOD) were consulted, as the site occupies the statutory Technical, Height and Birdstrike safeguarding zones surrounding the RAF Northolt aerodrome.
56. 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.

57. 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.

Impact on Metropolitan Open Land and Capital Ring

58. London Plan Policy 7.17 affords Metropolitan Open Land the same level of protection as Green Belt, and this protection is carried forward into emerging Policy G3. 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. Draft London Plan Policy G3 also encourages boroughs to enhance the quality and range of uses of Metropolitan Open Land.
59. There is no Metropolitan Open Land within the application site and the proposal would not compromise the permanence of the Park as Metropolitan Open Land. The triangle of land within the outline site within Brent Council's ownership forms part of Northwick Park and is designated Metropolitan Open Land, as is the Park itself and the golf course to the south. This area is currently grassed, with tree cover along part of the eastern boundary and a footpath on the western boundary. It links this site and the rest of the outline site to the entrance to Northwick Park station, which consists of an underpass beneath the railway tracks. Although the area immediately outside the underpass is paved and includes some Sheffield cycle stands, this area generally has an open aspect and visually forms part of the open expanse of the Park.
60. 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 childrens play area, all located near to the southeastern 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.
61. 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.
62. 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.

63. 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.
64. 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 6.10 and emerging 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 outline application site (and to the north of the golf course) is part of the Capital Ring and, where this reaches the Park at the southeastern boundary of the outline application site, the Capital Ring continues southwards through the Park and along its southern boundary as PROW38. However, the site would be over 100m distant from the Capital Ring and would not have any direct impact upon it. Improvements to the Capital Ring could be sought through Community Infrastructure Levy funding, as the increased residential population may increase usage of walking routes locally.

Heritage, townscape and visual impacts

65. 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.
66. 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.
67. Two conservation areas within Brent are nearby. Sudbury Court Conservation Area is to the south of the Park, bordering Watford Road and approx 500m 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.
68. 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 impact of the demolition and construction phase is also briefly discussed, however it is assumed that site hoardings would be provided throughout this phase to mitigate the visual impact of construction work. The representative views are discussed in the following paragraphs.

69. RV1: 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 and the taller element of the marker block 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 moderate and beneficial.
70. 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 proposed development would not be visible from this viewpoint, being behind existing housing and the railway tracks, and would have no effect on the townscape.
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, and would all be situated to the north of the Church spire. 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 moderate to minor beneficial effect.
71. 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 to minor and beneficial effect on this view.
72. RV5: Northwick Park (southern boundary): This view is also on PROW83 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 to minor and beneficial.
73. 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 although the upper floors of the proposed buildings would be glimpsed in the background in winter. This effect would be minor and beneficial.
74. 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. Two of the proposed buildings would be glimpsed in the background and, given the low sensitivity of this view, it is considered that this would have no effect.
75. 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 minor and neutral effect.
76. 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 neutral.

77. 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 minor and neutral.
78. 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. The proposed buildings would be screened by the intervening built form in the middle ground, and would have no effect on this view.
79. 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 floor of the tallest building 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 minor and neutral.
80. 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. The proposed development would be screened by the intervening built form and would have no impact on this view.
81. 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 two 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.
82. 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 the tallest building, and would have no effect on this view.
83. 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.
84. 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.
85. 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.

86. 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.
87. 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.
88. 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.

Impact on neighbouring residential properties

89. Any development will need to maintain adequate levels of privacy and amenity for existing residential properties, in line with 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.
90. 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 Guidelines recommend 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.

Light, outlook and privacy – south of site

91. Nos 2 and 3 St Marks Close are immediately to the south of the site boundary, and the side elevation of the northern block of Hodgson Court is approx 5.3m to the south of this boundary. The rear garden boundaries of Nos 17, 19 and 21 Nightingale Avenue adjoin the boundary, as do the side garden boundaries of Nos 21 and 23 and the rear garden boundaries of Nos 29, 31, 33, 35 and 37. These are the nearest properties to the south of the site. The northern block of Hodgson Court is approx 18m from the southern elevation of the proposed Block C1. However there are no windows on this existing side elevation, and the building does not have any private amenity space.
92. The side elevations of Nos 2 and 3 St Marks Close would face onto the proposed neighbourhood square,

and the façade of Block C1 would be at least 50m from their side boundaries and at an oblique distance. The rear gardens of Nos 17, 19 and 21 Nightingale Avenue would also face onto the neighbourhood square, at an oblique angle, while the front windows of No 21 would be over 20m from Block C3 again at an oblique angle.

93. The side boundary of No 23 Nightingale Avenue would be approx 2m at its closest point from Block C3, and the side elevation of this property would be approx 4.7m from the habitable room windows in Block C3. There are no side elevation windows in this existing property that would be impacted in terms of privacy or outlook and a single storey side extension is built up to the side boundary. The side garden boundary would be at a distance of 14m from the nearest element of Block C3, and this distance would increase towards the rear of the garden due to the oblique relationship between the buildings. Block C3 would be at least 20m from the rear elevation windows at No 23, and overlooking would be prevented by the oblique relationship between the two. This element of Block C3 consists of part two-storey part three-storey mews houses, which would sit comfortably within a 45 degree line of the garden boundary at all points.
94. The rear garden boundaries of Nos 29 and 31 Nightingale Avenue would be at least 21m distant from the part two-storey part three-storey element of Block C3, and this distance would be sufficient to prevent any loss of privacy to the gardens or windows of these properties and to ensure that there would be no breach of the 45 degree line. The rear windows of these properties would be at least 29m from this part of Block C3, which would sit well within a 30 degree line of those windows. The corner element of Block C3 would be at least 24m from the rear garden boundaries of Nos 33, 35 and 37 Nightingale Avenue and at least 31m from their rear windows. At these distances there would be no concerns about privacy and overlooking, and the building would sit well within a 30 degree line of the windows and 45 degree line of the rear garden boundaries.
95. Whilst these properties are considered to comply with the 30 degree and 45 degree tests, further analysis of impacts on light levels has been undertaken in the applicant's Daylight, Sunlight, Overshadowing and Solar Glare Assessment (Chapter 10 of the ES). This analysis finds that, of the properties tested, Nos 2 and 3 St Marks Close and Nos 1, 3, 5, 7 and 15 Nightingale Avenue would not experience any noticeable change in light levels. The following properties would experience noticeable effects:
- 21 Nightingale Avenue: one of six windows tested would fail to meet BRE target values for VSC, with a 25.5% reduction exceeding the recommended 20%. However this is a secondary window with the primary window having no noticeable impact, and all the rooms in this property would continue to comply with NSL values;
 - 23 Nightingale Avenue: one of six windows tested would fail to meet BRE target values for VSC, with a 30.3% reduction. However this is a secondary window with the primary window having no noticeable impact, and all the rooms in this property would continue to comply with NSL values;
 - 29 Nightingale Avenue: one of two windows tested would fail to meet BRE target values for VSC, with a 32.7% reduction, and the NSL value for the corresponding room would be reduced by 36.3%. However this window is situated beneath overhanging eaves and so is particularly sensitive to change, with self-limited outlook and lower existing VSC and NSL values than the window on the floor below;
 - 31 Nightingale Avenue: both of the two windows assessed would fail the VSC test although only marginally, with reductions of 26.2% and 29.3%, whilst one of the two rooms would experience a reduction in NSL of 28.6%. However this room is on the first floor with the window beneath overhanging eaves which means the window experiences low existing light levels and is particularly sensitive to change;
 - 33 Nightingale Avenue: one of the two windows assessed would see a reduction of 24.3% in VSC, and one of the two rooms would experience a reduction in NSL of 25%, however as with No 31, this window is beneath overhanging eaves which act as a constraint on light levels, and the other window tested would not be impacted;
 - 35 Nightingale Avenue: one of the two windows assessed would see a reduction of 20.4% in VSC, however both of the two rooms would continue to comply with target NSL values, and this impact is considered to be minimal;
 - 37 Nightingale Avenue: one of the four windows assessed would see a reduction of 21.8%, however all of the rooms tested would continue to comply with target values.
 - Hodgson Court: of the 107 windows tested, 89 (83%) would continue to meet BRE target values whilst 15 would experience low impacts. The other three would experience medium impacts, however these are all third floor windows constrained by overhanging eaves and as such have low existing light levels and are particularly sensitive to change. Of the 106 rooms tested, 105 (99%) would continue to meet the target values and one would see a reduction of 25% (this room is however constrained by overhanging eaves).

•Lister Court: of the 32 windows assessed, 27 (84%) would not be noticeably affected whilst the remaining five would experience reductions of between 20.3% and 28%, marginally above the 20% target. All rooms would continue to meet the NSL targets.

96. Overall, the impacts on daylight to neighbouring properties is considered to be minimal and within the levels that would generally be considered acceptable for new urban developments. Furthermore, the light available to many of the windows affected is already constrained by features such as overhanging eaves, which accentuates impacts due to new developments. As noted above, the NPPF 2019 also supports a flexible approach to applying standards in order to make efficient use of sites.

Light, outlook and privacy – north of site

97. To the north of the site, the rear gardens of properties on Northwick Avenue would be at least 175m distant from the eight-storey element of Block B1 and separated by the existing elevated railway tracks. At this distance there are no concerns regarding privacy and overlooking and there would be no breach of the 30 degree or 45 degree line.
98. To the northwest of the site, the existing student accommodation Blocks M and N are approximately 85m from the nearest element of the proposed Block B1, which would be eight stories high. At this distance there are no concerns regarding privacy and overlooking, however the taller 16-storey element would breach a 30 degree line from these windows and the impact has been assessed in more detail in accordance with the BRE guidelines.
99. None of the 20 windows tested in Block M would experience any noticeable change in light levels. A total of 39 windows in Block N were tested, and all would comply with the BRE target values, whilst 33 of the 34 rooms would retain target levels of daylight distribution. The one room not meeting the target values would experience a reduction in NSL of 30.8% (ie to 0.692 times its former value). However this type of accommodation is considered to have low sensitivity to daylight as it is not in use as a permanent residence. Consequently the impact is not considered to be significant.

Light, outlook and privacy – west of site

100. To the west of the site are Hospital buildings. Non-residential buildings are not generally assessed for daylight impacts, but wards providing accommodation for patients have been assessed in this case. Whilst wards in Block V (St Marks Hospital) and Block J would experience no noticeable change in light levels, many of the windows in Block K would experience significant loss of light and daylight distribution would be adversely affected in a number of the rooms. These would however be considered to be less sensitive to change than permanent residential properties, as they are not occupied on a permanent basis. Consequently, while the effect in terms of light levels would be quite significant, the impact on patients' amenity and quality of life is not considered to be unduly adverse.

Sunlight and overshadowing

101. Existing windows facing within 90 degrees due south of the site have been tested for overshadowing, and there would be no noticeable impact on any of these.
102. Overshadowing effects on open amenity spaces have been assessed by plotting hourly shadows created by the development on the winter and summer solstice and the spring equinox. In the morning there would be some overshadowing of the open space within the University campus and of the Brent triangle land, whilst in the afternoon there would be some overshadowing of the nearest part of Northwick Park. These impacts are commensurate with a development of this scale and bulk, however, and are not considered to be significant given the expanse of amenity space available in the Park overall. At least 50% of each of the spaces assessed would continue to receive two hours of direct sunlight on 21 March, and this would be compliant with the BRE target values.

Conclusion

103. The proposed buildings would provide sufficient separation distances to ensure acceptable standards of privacy for existing residents and would not be detrimental to the outlook from existing properties. The impact on daylight to existing residential windows has been assessed in detail and is considered to be minimal within the context of the overall scale and density of the scheme. Some overshadowing would occur to existing open amenity spaces, but this would be of a transient nature and would be of a degree that is considered commensurate with the scale of the proposal.

Design, scale and appearance

Policy background

104. The NPPF emphasises that good design involves responding to local character and history and reflecting the identity of local surroundings and materials, while not discouraging appropriate innovation. High quality design is also promoted by London Plan Policy 7.6, draft London Plan Policy D4, CP6, and Brent Core Strategy 2010 Policy CP6. Policy DMP1 requires the scale, type and design of development to complement the locality and the Brent Design Guide SPD1 provides further advice on general design principles. SPD1 states that development should respond to the local context and respect the existing character of the landscape, streetscape, architectural and historic environment. Building heights should positively respond to existing character and massing should limit the visual impact of height and bulk by effectively breaking up facades, creating a varied roofscape and relating positively to existing surroundings.
105. 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.
106. The existing buildings adjoining the site include the main Northwick Park Hospital building, which is the equivalent of eleven storeys in height, a twelve-storey building fronting Watford Road on the University Campus, and three- to four-storey residential buildings with pitched roofs near to the park boundaries. Other buildings scattered throughout the Hospital grounds are of lower heights, generally four to six stories, and smaller in bulk and overall there is a lack of coherence, legibility and architectural character to the layout. The site is visually separated from other residential areas, which together with the scale of the development presents an opportunity to create a new character for the area.

Layout and arrangement of uses

107. The layout of the proposed development would be organised around a 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 (under ref 20/0677 or 20/0700) and to the pedestrian and cycleway leading north to Northwick Park station. At its southern end, the street would connect to the proposed Phase 3 of the outline application site ref 20/0700.
108. The built form on the site would consist of five buildings which would line the main street. Blocks B1, C2, C3 and C4 would be arranged to the east between the street and the Park boundary. Block C1 would be to the west, between the street and the eastern section of the Hospital ring road. Block B1 would be located at the junction of the main street with the new spine road and the pedestrian and cycleway to Northwick park station, and would have commercial uses and a nursery at ground floor to provide an active frontage and focal point for the development, with residential units above. The other blocks would be wholly residential in use.
109. The main street would provide a two-way vehicular and cycle route and also a tree-lined pedestrian route approx 10m wide, interspersed with seating, landscaping and pockets of play space for children. The landscaped areas would extend into the side streets leading off the main street between the blocks, providing a visual connection to Northwick Park and culminating in a neighbourhood green space to the south of Block C1. The side streets would have different characters according to their function and the character of the buildings, but would all have restricted vehicle access and an emphasis on soft landscaping. The internal layout of the buildings has been designed to provide entrances and habitable room windows onto the streets, including both communal entrances and entrances to individual properties, so as to provide natural surveillance and to minimise the areas of inactive frontage created by entrances to car parking areas and bin stores.
110. The layout is considered to provide a coherent, logical and legible environment for residents and visitors. The location of Block B1 would lead to its being a natural focal point for the development which would be reinforced by the provision of non-residential uses on the ground floor. A variation in character across the site would be achieved by the differing treatment of streets and frontages. For example, the

main street elevation of Block C1 would be activated by individual stepped entrances to three-storey maisonettes, which from the street would provide a more intimate domestic character similar to Georgian townhouses (step-free access to these units would be provided via the first floor podium) and to contrast to the larger communal entrances. The proposed 'gastro-eatery' in particular would provide an opportunity for outdoor seating that would potentially animate the space to the north of the building to provide an enhanced sense of arrival from Northwick Park station. The restricted vehicle access and extent of soft landscaping would help to create a comfortable environment for pedestrians and cyclists, and the neighbourhood green space would provide a second focal point for the development, emphasising play and recreation.

Height, mass and bulk

111. The buildings would all be in the form of perimeter blocks, apart from Block B1 which would have a continuous ground floor frontage but on the upper floors would have two point blocks of eight and 15 stories with a linking section of six stories. Along the Park edge, building heights would be restricted to five or six stories, whilst Block C1 along the Hospital ring road would rise to 12 and 13 stories. 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.
112. Each building would consist of a number of different elements of different heights. Blocks C2, C3 and C4 would all have the same basic form, with eight-storey corner elements defining and providing a sense of enclosure for the entrances to the side streets, and separate elements of two, three, five and six stories. Block C1 would be of a roughly triangular form with three corner blocks of greater height defining street junctions and interspersed by linking elements of lower height. Block B1, as noted above, would have three distinct elements above the ground floor.
113. The building heights are considered to respond effectively to the topography of the land, as the ground level rises towards the northwestern 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 element 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. The lower heights along the Park edge 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.
114. The two- and three-storey elements in Blocks C2, C3 and C4 would provide 3bed mews houses with individual entrances, and these would face onto one another across a landscaped mews street on Blocks C2 and C4, and a similar landscaping treatment would be provided for the street to the south of Block C3 so that a similar form of development could come forward as part of Phase 3 of the outline site. Although parts of these houses would be less than 18m distant from one another, this is considered acceptable in this instance as it is characteristic of the mews street scale and typology. The variation in heights across the development would help to create a variation in character, from the more intimate quality of the parkside and mews streets to the more dense urban character of Block C1 adjoining the ring road and the grander civic quality of the relationship between Block C1 and the neighbourhood green space. The combination of elements of varying heights and bulks 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.

Architectural approach and materiality

115. The architectural approach draws 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. On the Hospital ring road elevation, the elevation of Block C1 appears as a densely packed grid whereas the elevations facing onto the main street appear more loose and open, whereas those on the park edge appear looser still.
116. This approach would reinforce the variation in character across the site expressed in the layout and building heights. The Hospital ring road elevation of Block C1 would be designed to have a relatively

dense urban character, whereas the park edge elevations would have a more suburban character to reflect their proximity to the open space, and the main street elevations would provide a transitional zone between these two extremes. The grid approach would be focused on key areas such as the corner elements, 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.

117. A materials palette is proposed, with the main building material 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 Design & Access Statement sets out 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 by condition.

Conclusion

118. Overall, the design approach is considered to be of high quality and is strongly supported.

Residential living standards

Policy background

119. All development is required to comply with standards and criteria set out in draft London Plan Policy D6, including minimum internal space standards based on Technical Housing Standards – Nationally Described Space Standard 2015. Appropriate levels of light, outlook and privacy must be provided for residents, and further guidance on these issues are given in the Brent Design Guide SPD1.
120. Minimum private outside space requirements are also set out in draft Policy D6, however the policy makes clear that these only apply in the absence of higher local standards. Brent's standard is set out in Policy DMP19 and draft Local Plan Policy BH13 and is 20sqm per unit (or 50sqm for family housing including ground floor flats). Childrens' play space is required in accordance with draft new London Plan Policy S4, which requires at least 10sqm per child, and the more detailed criteria set out in the Play and Recreation SPG 2015.
121. Draft 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. Compliance with these requirements should be demonstrated in the application, however further details can be required by condition.

Internal space

122. The Design and Access Statement and drawings submitted with the application demonstrate the residential unit types and layouts that would be provided as part of the development.
123. All of the residential units would be designed to comply with or exceed minimum internal space standards, and in general the unit layouts are considered to be efficient and logically laid out to achieve good levels of outlook and access to light. Approximately 75% of the units would be dual aspect, which is considered a high proportion for a development of this size, and there would be no directly north-facing single aspect units, the majority of the single aspect units facing either north-east or west/south-west so as to avoid the risk of overheating associated with south-facing units.
124. The relationship between the non-residential units and the residential units 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.
125. The layout includes secure main entrances to the residential units in each block, in locations that would be well overlooked so as to maintain a sense of security and natural surveillance. The Mayor's Housing SPG advises that no more than eight units per floor should be accessed from a single core, to prevent an impersonal and unneighbourly character from developing. The layout of the majority of the blocks would meet this requirement. It is noted that the layout of block C1 would result in a maximum of nine units per floor accessing one core. However, whilst this is not strictly in accordance with the guidance it is not considered so excessive as to be of concern, with a glazed decked access that

overlooks the podium garden..

Accessible and adaptable units

126. The Design & Access Statement demonstrates how the development would incorporate principles of inclusive design, including step free access and unobstructed sight lines. It also confirms that 10% of new homes would be designed to accord with Building Regulations requirement M4(3), to be wheelchair accessible, or easily adaptable, and that these would be located on ground floors or accessed directly from the street or be situated with blocks that have two lifts.
127. To ensure these standards are met, a condition would be imposed to require that 90% of the units would accord with Building Regulations requirement M4(2) for 'Accessible and adaptable dwellings', and 10% would meet M4(3) requirements.

Relationship between proposed units

128. It is noted that some separation distances between proposed residential units, both within the same block and between neighbouring blocks, would measure less than the minimum 18m guidance as stipulated in SPD1. However, these would generally be between secondary windows that residents would not rely on for their light and outlook, and windows have been positioned so as to not directly face one another. Examples of these minor shortfalls include a distance of 13.37m between the balconies of the northern units in Block B1 from floors 1 to 7, and a distance of 13m between the inward facing habitable rooms of the units looking across the podium garden at their closest distance but at an oblique angle within Block C1. It is considered that on balance, the close arrangement of the proposed units is characteristic of urban living and the proposed relationship between residential units is not considered to result in any significant impact on the residential amenity of future occupiers in terms of loss of light, outlook, or privacy.
129. Some minor amendments to the design and layout of the units have been agreed with the applicants and are shown on the amended plans. These involve, for example, changes to the layout of the 3bed mews houses to increase separation distances between habitable rooms.
130. The overall arrangement of fenestration within the residential units would also add to increased passive surveillance for the public realm which is welcomed. It is noted that a number of balconies would adjoin one another, and a condition would be required to ensure details of privacy screening are submitted and approved.

Daylight and sunlight

131. Analysis of the proposed residential accommodation shows that the majority of rooms would achieve full compliance with the BRE Guidelines in each of the tested scenarios. The analysis shows that a total of 83% of the rooms assessed would meet the Average Daylight Factor (ADF) target and 69% of the assessed windows would comply with the Annual Probable Sunlight Hours (APSH) target.
132. The majority of proposed units would experience high levels of interior daylight and sunlight amenity. Where breaches of the target values occur within the scheme, they primarily relate to rooms lit by windows set directly beneath balconies. In these cases, the amenity benefits associated with the balconies is considered to offset any associated reduction in natural light. It is also noted that many of these rooms would also be served by balconies which restrict internal light levels to some extent whilst also providing valuable private external space.
133. Overall it is considered that the residential units would receive good internal light levels for a dense urban setting.

Overheating analysis

134. An overheating analysis was submitted outlining the strategies proposed to reduce the cooling demand and the overheating risks of the development, in line with the cooling hierarchy set out in London Plan Policy 5.9.
135. The proposed strategies include minimising internal heat generation through energy efficient design, reducing the amount of heat entering the building during the summer, the use of thermal mass and high ceilings to manage the heat within the building, the use of passive ventilation and use of mechanical

ventilation. Overall it is considered that that the risk of overheating would be satisfactorily resolved through these measures.

External amenity space

136. The proposed residential units would have access to a mixture of private balconies or terraces and communal gardens. For Block B1, shared amenity space would be provided in the form of a podium garden, along with ground floor amenity space in the form of an internal courtyard (the latter has not been included in the assessment of residential amenity space as it would also be accessible for commercial tenants and used to an extent for general circulation and servicing). For Block C1, shared amenity space would be provided in the form of a podium garden, along with roof top gardens on the seventh and eighth floors. Shared amenity space would be provided in the form of a podium garden and ground floor amenity space along the park edge for Blocks C2, C3 and C4.

137. The overall provision of amenity space has been assessed against the requirements of Policy DMP19 in the table below. The private balcony or terrace area for each unit has been assessed against the 20sqm or 50sqm standard as appropriate (these calculations are not provided in the report but are available on request), and a cumulative shortfall calculated for each block (where units have an excess of private amenity space this is counted as a zero shortfall). The communal amenity space available to each block has then been compared to the cumulative shortfall to derive a residual shortfall for each block.

Block	Cumulative shortfall	Communal amenity space	Residual shortfall / overprovision
B1	1,394sqm	1,311sqm (podium garden)	84sqm shortfall
C1	2,074sqm	1,986sqm (podium garden and two roof terraces)	89sqm shortfall
C2	926sqm	739sqm (podium garden and park edge garden)	187sqm shortfall
C3	887sqm	1322sqm (podium garden and park edge garden)	435sqm overprovision
C4	889sqm	1327sqm (podium garden and park edge garden)	437sqm overprovision

138. The proposed communal amenity spaces would incorporate a range of activities for future residents including doorstep play, meeting and sitting areas, garden spaces with hard and soft landscape and planting. Their design and form of access ensures that they would be accessible to users with all levels of ability. The communal gardens would incorporate appropriate lighting to highlight key elements in the evenings without creating light overspill into the adjacent dwellings. Other functional lighting would also be provided at the core entrances. Playable spaces would be sensitively integrated into the courtyard design. The communal areas would contain playable objects forming an integral part of the overall design to encourage imaginative and diverse play for younger children. The planting scheme would further enhance the courtyards, enticing the residents to use them.

139. The scheme would include residential units sited adjacent to communal garden areas, making the need for defensible space all the more important if the future occupants are to have any meaningful outlook and not be overlooked. Additional details regarding the design and quality of proposed defensible space would be secured via condition to safeguard the residential amenity of future occupiers of the units. It is noted that some residential windows would be sited adjacent to communal deck access areas without defensible space. However, these would mostly serve kitchens which is not considered to result in any detrimental harm in terms of privacy. Overall the siting of these windows is considered to result in a beneficial increase in passive surveillance for the communal areas, especially regarding the windows which would overlook play areas, and is therefore welcomed.

140. The results of the overshadowing assessment for amenity spaces indicates 62% of the total amenity space assessed would achieve direct sunlight levels in line with the BRE criteria. Whilst there are areas below the suggested targets, these areas would receive some direct sunlight for part of the day and are generally linked to well sunlit spaces.

Play and recreation

141. London Plan Policy 3.6 and Policy S4 of the draft London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10sqm per child.
142. Independent calculations show that a total of 2,704sqm play space is required for the scheme based on the GLA Population Yield calculator. The Planning Statement and Design and Access Statement for the scheme set out that 4,560sqm. of play space would be provided. Indicative plans have been provided showing the locations of play space within the scheme, including areas within communal courtyards of the blocks, as well as publicly accessible areas.
143. The submitted play strategy states that a play area for younger children would be provided in the Neighbourhood Square. This would be an open space of 1,500sqm with a range of equipment. A further 300sqm of play space would also be included in each of the four podium gardens in Blocks B1, C2, C3 and C4, and 500sqm of play space would be located in the podium garden in Block C1. Incidental play spaces and fitness elements would also be provided as part of the linear park along the main street. Overall, these features would provide 4,560sqm of play space. Further details of play equipment would be required by condition, together with maintenance arrangements (as play equipment would not be adopted or maintained by the Council) and measures to ensure children do not run out into the road.
144. The Design and Access Statement states that due to space restrictions, the type of play provided on the site would be predominantly for age up to 12yrs, with the toddlers' activity concentrated within the courtyards and play space for age 5-12yrs within the neighbourhood square.
145. Playable space must only include spaces where children's active play is a legitimate use of the space, and playable spaces typically should include design elements that have 'play value'. Further detail would be required regarding the design and nature of the proposed play spaces which would be secured via the landscaping condition. Early implementation of the play space within the delivery of the scheme would also be secured via an appropriately worded condition.

Conclusion

146. Overall, the residential units are considered to provide a high standard of accommodation and to achieve a high level of compliance with all the relevant policies and standards. Whilst Blocks B1, C1 and C2 would have a small shortfall in external amenity space against the Policy DMP19 standard, the other blocks would have a small overprovision. However, residents would all have access to amenity space in the form of private balconies or terraces and communal gardens, and would also benefit from being in close proximity to Northwick Park. These factors, together with the provision of landscaped public realm around the site such as the neighbourhood square and the linear park which would provide easily accessible additional external amenity space for residents, are considered to adequately mitigate the shortfall of private amenity space for some blocks. Furthermore, the on-site residential amenity space is considered to represent an acceptable level of provision including a range of high quality private spaces and access to wider public realm, notwithstanding some limited areas of shortfall against Policy DMP19.

Wind microclimate

147. London Plan Policies 7.6 and 7.7 and draft 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.
148. 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.

149. The assessment includes various scenarios, and the following results are based on the detailed development including the proposed landscaping measures being completed. It shows that the wind microclimate around the development would range from sitting to walking conditions during the windiest season (winter) and from sitting to standing conditions at most locations during summer. Pedestrian thoroughfares would achieve strolling conditions or calmer in the windiest season. Pedestrian crossings and entrances to buildings would have standing conditions or calmer, bus stops within the site and along the spine road would have sitting conditions in the windiest season, and roadways would have strolling conditions or calmer. Ground level and podium amenity spaces would have sitting or standing conditions in summer with seating areas located where sitting conditions can be achieved, and similar conditions would be maintained in amenity areas surrounding the site.
150. However, 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. Recommended measures include solid or semi-porous balustrades, side screens and landscaping elements. Further details of the mitigation measures to be provided would be required by condition. Subject to this condition, the proposal is considered to provide an acceptable wind microclimate for residents.

Green infrastructure and natural environment

Impacts on trees

151. 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.
152. 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 67 trees and tree groups of which 44 would be removed to facilitate the development. All trees have been categorised as of high, moderate or low quality (there are no Category U trees, those which not suitable for retention due to their poor condition, on the site), and a summary of trees to be retained and removed is provided in the following table.

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

153. No trees within the Park boundary would be removed, and so the continuous mature tree belt would be retained. These include the one Category A tree surveyed, a White Willow (T185). Trees to be removed would be of various species including Ash, Lime and White Willow, a cluster of Cypress trees on the northwestern corner of the site and a row of London Plane trees on the western edge of the car park. 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.
154. The Design and Access Statement sets out the proposed tree planting strategy. This proposes a wide variety of species including several types of street trees which would line the streets of the development and would include species chosen to contribute to the 'rain garden' linear park running along the main street, small child friendly trees and some larger trees in the neighbourhood green,

multi-stem trees along the mews streets, trees to form a native planting edge along the Park boundary, and smaller trees for the podium and roof gardens. Temporary tree planting is also proposed in the temporary amenity space area.

155. Excluding the temporary trees, a total of approx 208 new trees are indicated as being planted within the site. This represents a replacement ratio of 4.7 new trees for each tree lost, and is considered to adequately mitigate the loss of 44 existing trees and tree groups, such that a financial contribution to tree-planting off site is not required in this instance. Further details would be required as part of the landscaping condition, including the exact number, type, species, biodiversity value and location of each tree together with the design of tree pits and details of soil depths on podium gardens and roof terraces.
156. A detailed arboricultural method statement, tree protection plan, supervision schedule would also be required as a pre-commencement condition, together with details of finished ground levels within the RPA of retained trees.

Biodiversity impacts

157. London Plan Policy 7.19 provides protection for Sites of Importance for Nature Conservation (SINCs) and this protection is carried forward into draft London Plan Policy G6. Brent's draft Policy BG11 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 7.19, 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.
158. There are two SINCs relevant to this site, both classified as of Borough Importance Grade 1. The 'Northwick Park and the Ducker Pool B103' SINC includes the tree belt along the southern boundary of the outline site, the tree belt and ditch on the eastern boundary with Northwick Park, the Brent Council parcel of land to the north of this site, and part of the University site. The only area of this site within the SINC is part of the eastern boundary, as this includes some mature tree cover reinforcing the tree belt in the Park.
159. 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 BG11 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 7.19. This SINC is approximately 100m from the site, however, and would not be directly affected by the development.
160. A review of all SINC sites across the Borough was conducted on behalf of the Council in 2014. In respect of the B103 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 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 B106H 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.
161. 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, but subdivides it into distinct zones of which this site comprises A1 Boiler House Land and A2 Car Park Land. 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.
162. The proposal could also potentially affect biodiversity interests on the adjoining parts of the outline site. To the south, Zone A3 Nightingale Avenue supports small residential gardens, amenity

grassland, scattered trees, and garden beds throughout. To the north, Zone B1 Brent Site 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. To the northwest, Zone C Developable Site for University of Westminster, 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 spine road is also assessed as a separate zone.

163. Site surveys found that the vast majority of the site was identified as being of very low suitability for protected and priority species such as badgers or reptiles. Boundary habitats 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 and around the site, although the site overall is very low in suitability for protected and rare bird species 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.
164. 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. 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. There were some records of hedgehogs locally, however there were no signs or evidence of these on the site. It is possible that hedgehogs could use habitats adjacent to the proposed site, although significant use of the site was considered unlikely.
165. The impacts of climate change have also been considered. These could be beneficial or adverse depending on the specific species and habitats, but on an artificial and urban site of this nature precipitation is likely to be a more significant influence than long-term changes in average temperature. Increased temperatures could encourage a more diverse range of species such as bats, however the urban habitat of the site and surrounding area is unlikely to support these. Increased precipitation levels could increase peak flow in the boundary ditch and peak run-off across the site, however mitigation measures including sustainable urban drainage and increased tree planting would be features of the scheme to mitigate these impacts.
166. Further precautionary and compensatory measures are recommended in the Appraisal, to avoid or minimise any impacts on protected species and other wildlife in the construction period. These 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. Suitable measures would be secured under a Construction Environmental Management Plan (CEMP), which would be in place during the construction phase, and this would be required as a pre-commencement condition.
167. For the completed development, a wildlife-friendly lighting strategy is recommended, together with replacement planting of native and wildlife-attracting plants and trees, deadwood to be retained and provision of habitat boxes (including for birds, bats and hedgehogs) to enhance biodiversity value across the site. Further details would be required by condition. The CEMP would also include a requirement for an updated assessment of the ecology of the site, following completion of each Phase and no later than two years following completion of the development.
168. In terms of this application, the main adverse impact would be the loss of trees and vegetation providing opportunities for bat and hedgehog foraging, and potential bird nesting and bat roosting features, during the construction period. However, this impact is considered to be acceptable subject to the precautionary measures highlighted above. Replacement tree planting and landscaping would compensate for the loss of these features, providing new biodiverse, connected corridors, and the overall scale and nature of landscaped features would represent a significant improvement on the existing site. Nonetheless, to compensate for the temporary loss of habitat during the construction period, a financial contribution of £10,000 towards biodiversity enhancement measures in Northwick Park would be secured through the s106 agreement.

Urban greening

169. Draft 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 BG11 supports this approach but does not propose a borough-specific Urban Greening Factor, therefore the generic Factor is used to assess developments in Brent.
170. The existing site is primarily 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.
171. Further information on the Urban Greening Factor of the existing and proposed site is to be provided via the Supplementary Agenda and in response to the GLA Stage 1 report. However, officers consider the overall extent and quality of green features across the site to be very high, and there are no concerns regarding compliance with these policies.

Flood risk and drainage

Flood risk

172. 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 London Plan Policy 5.12 and Brent's Policy DMP9a.
173. 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.
174. 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 the public foul sewer could accept the flows from the application site. 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.
175. 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. However, small parts of the site are at high risk of surface water flooding, as are parts of the residential area to the south and the Pryors Path footpath running alongside the site in Northwick Park.

Drainage

176. London Plan Policy 5.13 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.
177. 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.

Conclusion

178. 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 in the wider outline site and would have a significantly positive impact on the overall flood risk to the local area including the site itself.
179. 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. 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. The proposal is acceptable in terms of flood risk and drainage, and no conditions are required other than the implementation of the approved Strategy.

Sustainability and energy

Policy background

180. Major residential developments are expected to achieve zero carbon standards, including a 35% reduction in on-site carbon emissions compared to the Building Regulations 2013 Target Emission Rates, in accordance with London Plan Policy 5.2. For non-domestic floorspace, the policy target is a 35% on-site reduction in carbon emissions. An Energy Assessment is required, setting out how these standards are to be achieved. Any shortfall in achieving the target emissions standards is 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 over a period of 30 years.
181. Brent's Policy CP19 requires a Sustainability Statement setting out measures that would be taken in response to climate change, including limiting water use to 105 litres per person per day. It also requires any proposal for commercial floorspace of over 1,000sqm to demonstrate that it achieves BREEAM Excellent standards.

Assessment of proposal

182. The residential element of the development would achieve a 39% reduction in carbon emissions compared to the Building Regulations 2013 baseline, including 11% through Be Lean measures such as energy efficient building materials, U-values and glazing. Be Clean measures would increase this to a 38% reduction, with the proposal for a hybrid (air source heat-pumps combined with gas boiler) energy centre and connection to a district heating network if one becomes available in the future. Be Green measures comprising rooftop photovoltaic panels would take the total reduction up to 39%. The commercial element has been assessed separately and would achieve a 49% reduction overall.
183. Both elements would exceed the policy requirement for reduction in on-site carbon emissions and in combination would deliver a 40% reduction in carbon emissions. Monitoring facilities would be installed to allow for energy performance to be monitored and reported for at least five years post construction.
184. The GLA considers the energy strategy to be generally compliant with London Plan and draft London Plan policies, and is discussing detailed technical issues with the applicant prior to the Stage 2 referral. Brent's Energy and Sustainability Officer also considers the proposals to have effectively optimised opportunities for carbon emissions reduction on-site. A district heat network combining this site with the University and Hospital sites has been considered, however given the disproportionately high demand for energy generated by the Hospital this is not considered a practical solution at this time. Notwithstanding this, the application would need to make provision for future connection to a district heating network, and further details of this would be required by condition. A commitment to connect to a district heating network should one become available would be secured through the s106 agreement.
185. The remaining carbon emissions would be offset by a contribution to Brent's carbon offsetting fund, which at this stage is estimated to be £671,910. An updated Energy Assessment, recalculating predicted carbon emissions based on detailed construction drawings, would be required prior to

commencement of any phase, together with an initial offsetting contribution. Following completion of each phase, an Energy Assessment Review would be required, recalculating carbon emissions again and at this stage the final offsetting contribution would be required. The resubmission of Energy Assessments and the two-stage contribution are intended to provide an incentive to developers to seek further reductions in carbon emissions during the detailed design and construction stages, in order to reduce the financial contribution payable.

Environmental health

Air quality

186. Like many areas in Brent, the site is within an air quality management area, and London Plan Policy 7.14 and draft London Plan Policy SI1 require 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.
187. 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 to ensure adequate measures are in place to control dust, noise and other environmental impacts, and this has been acknowledged in the ES.
188. 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.

Contaminated land

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

Noise and vibration

191. 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. 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.
192. 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.
193. 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.

Lighting

194. A condition is required, to ensure a scheme for external lighting is submitted for approval and that this complies with the Institute of Lighting Professionals' guidance on reduction of obtrusive light (2020).

Odour

195. An appropriate odour control system would be required for any commercial kitchens within the A3 uses. This would be secured by condition.

Transport considerations

Existing situation

196. The site depends on the one-way ring road serving Northwick Park Hospital for vehicular access from Watford Road (A404). Bus routes H9/H10 and 186 serve the ring road, stopping at the social club. 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.
197. Pedestrian access is also available along the northern section of the hospital ring road and the public right of way to the north of this, from Northwick Park station and from Northwick Park itself via the Priors Path footpath running along the eastern boundary of the site.

Access

198. Road access to the site would be provided from the existing northern access to the Hospital from Watford Road and the northern section of the Hospital ring road. This access would be converted into a two-way all-movements signalised junction including toucan crossing facilities for pedestrians and cyclists. The section of the ring road would be converted into a two-way spine road to serve the application site in addition to the existing University and Hospital facilities.
199. A new 3.5m wide shared footway and cycleway would be provided on the northern side of the spine road, and the existing zebra crossing at the eastern end of the road would be relocated approx 100m to the west. The existing 2m wide footway on the southern side of the road would be retained.
200. The works to create the spine road have been applied for separately and would be implemented under the full planning application 20/0677 or the outline application 20/0700. The three applications would be linked by a s106 agreement, and this would secure the construction of the road and footway / cycleway to adoptable standards before any of the residential units are occupied.

Road layout within site

201. The spine road would connect to a new two-way main street within the development, which would run north-south and would connect to an east-west street to the south of Block C1 which would allow traffic from within the site to exit onto the eastern section of the Hospital ring road. These would all be designed as secondary vehicle routes, catering for lower levels of traffic than the main spine road, and would mainly be used by residents of the development.
202. The streets between Blocks B1 and C2, and between Blocks C4 and C3 would be tertiary vehicle routes to allow access for servicing vehicles and to the residential parking and cycle parking areas within each block, with vehicular dead ends at defined points. The latter street would also provide a pedestrian and cycle route into Northwick Park, and works to link this to the Priors Path footpath would be secured in the s106 agreement. Between Blocks C2 and C4, and to the south of Block C3, would be mews streets designed primarily for pedestrian and cycle use although service vehicles would be able to access the entrances to these streets for bin collection.
203. To the south of Block C1 a tertiary street would run along the edge of the neighbourhood green space. This would provide access to the residential parking area, however it is proposed that the remainder of the street would be for emergency and servicing vehicles only, with all other vehicles using the main street to exit the site. Further details would be required as part of the landscaping scheme, to demonstrate how vehicle access to this and the other side streets would be restricted, to ensure that they provide pedestrian and cycle friendly environments. This route would also continue across the main

street to link to the side street providing pedestrian and cycle access into Northwick Park, and the landscaping scheme would also be required to demonstrate how pedestrian and cycle movements could be prioritised throughout this route, and other means to establish visual continuity and aid wayfinding to the Park.

204. The main street is intended to be adopted by the highway authority, as are other routes within the wider outline site (these are the proposed spine road, the pedestrian and cycle route from Block B1 to Northwick Park station and the east-west road along the existing alignment of Nightingale Avenue). The design of the street includes raised tables and kerb build outs to provide traffic calming measures, and double yellow lines would provide parking controls. 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.
205. All side streets and access roads within the site would be retained as private streets and managed by the Applicant.

Parking provision

206. Brent 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. 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.
207. Residential parking provision reflects Draft London Plan Policy T6.1, which allows up to one space per dwelling in outer London areas with poor PTAL ratings and requires developments in areas with very good ratings to be car free other than for disabled use. The application would provide parking at a ratio of 0.11 spaces per dwelling, comprising a total of 73 spaces including 20 spaces for disabled use to serve 3% of the dwellings. Parking provision is proposed as in the following table:

Block	Nbr units	Nbr standard parking spaces	Nbr disabled parking spaces	Total spaces
B1	140	0	0	0
C1	261	25	9	34
C2	83	9	4	13
C3	85	9	4	13
C4	85	10	3	13
Total	654	53	20	73

208. Block B1 would be acceptable as a car-free development given its proximity to Northwick Park Station, however this block would not contain any wheelchair accessible units it would still require disabled parking to cater for 3% of residents (four spaces) as Blue Badge holders would not necessarily also be wheelchair users. It is proposed that spaces for any Blue Badge holders resident in Block B1 would be made available in the adjacent Block C2, which has been accepted by Transport officers as it would be within the maximum acceptable distance of 50m from Block B1.
209. No details of electric vehicle charging points have been provided, and these would be required for at least 20% of the units together with passive provision for the remaining units. Further details would be secured by condition. A car park management plan would also be required by condition.
210. Commercial parking provision would be limited to one disabled space adjacent to Block B1, for visitors to the non-residential elements of that block, and two short-stay spaces on Main Street to allow for other circumstances such as drop-off and pick-up trips generated by the nursery.
211. 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 to the south 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 as Phase 3 of the outline application.

212. The nearest public roads, which are 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).
213. 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.

Cycle parking

214. 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. This results in a minimum requirement of 1,196 long stay cycle parking spaces to be provided for residential uses in this case.
215. The proposal includes 1,200 spaces, so meets the policy requirement in terms of numbers. The 3bed mews houses in Blocks C2, C3 and C4 would each have individual cycle stores located within their forecourts. For other units, cycle stores would be located within the ground floor covered parking area of each block and accessed either through the vehicular access or from the street. Non-standard cycles such as tricycles and cargo bikes could be locked securely on the 122 spaces proposed as Sheffield stands, representing 6% of the total spaces which exceeds the minimum requirement of 5% for non-standard spaces.
216. The remaining spaces would be provided as two-tier stands, with adequate access arrangements and aisle widths. Further details of the cycle storage have been provided to demonstrate that details such as spacings between stands would be provided in accordance with the product specification. For the commercial units, long-stay cycle parking would be provided by tenants as a requirement of their lease. As these units would be provided as shell and/or shell and core at this stage, cycle parking could be accommodated as part of the detailed fitout of the units, and a condition requiring further details at that stage is recommended. Short-stay cycle parking is also required, to a total of 50 spaces including both residential and commercial uses. A total of 33 Sheffield stands (providing 66 spaces) are indicated, which exceeds the requirement.

Delivery, servicing and construction traffic

217. An outline delivery and servicing plan has been submitted. Refuse vehicles would use the spine road to access the site, travelling down the main street and returning along the south of Block C1 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 strategy to be acceptable in principle.
218. Residential bin stores would be provided in each block, and would satisfy the Council's requirements in terms of the capacity provided per block. Bin store locations have been assessed by officers and further clarification provided by the applicants to demonstrate that these would be within an acceptable carrying distance of 10m from the stopping points identified, and tracking diagrams have been submitted to demonstrate that vehicles could manoeuvre safely. A small amount of managed collection arranged by the applicants would be required for Block B1, and further details would be secured in a delivery and servicing plan.
219. Other servicing activities are intended to take place from the main street, with vehicles waiting on single or double yellow lines. Transport officers have accepted this approach in principle, and have sought clarification on servicing arrangements for commercial units. These matters would be dealt with through the submission of a detailed delivery and servicing plan as a pre-occupation condition.
220. A Construction Logistics Plan (CLP) would be required as a pre-commencement condition. 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 highways impacts

221. 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 Chapter 7 of the ES (table 6.6), which predicts 44 trips into the development and 281 outbound trips in the AM peak hour, together with 187 inward trips and 101 outbound trips in the PM peak hour, and a total of 1,615 trips each way daily.
222. 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 162 car trips per day both into and out of the site. The findings have also been accepted by TfL.
223. 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 58 cars and vans, and 9 larger vehicles, per day (most of these delivering to residential units).
224. 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. This assessment has been based on the trip generation rates for the outline application site as a whole, of which the residential units are expected to be fully occupied by 2030, and therefore provides a 'worst-case' scenario compared to this application.
225. 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.
226. 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

227. 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.
228. 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.

229. 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.
230. 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 of the outline site as a whole (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. The impact of the detailed application itself was not modelled as a scenario, however it is assumed that this would be a pro-rata proportion of the 2031 baseline plus. The 2031 baseline plus scenario thus represents a 'worst case' scenario, however information specific to this application has been requested from the applicant and will be reported via the Supplementary Agenda.
231. 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.
232. 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.
233. 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.
234. 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.
235. 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 depend upon it 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. Consequently, your officers consider that this requirement should be addressed together with the need for capacity improvements.
236. 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. TfL would agree the scope of the feasibility study. 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. Given that capacity constraints are expected to occur as a result of baseline growth in any case, your officers do not consider it appropriate to seek a financial contribution from the development at this stage. This approach

has been agreed by TfL, and they note that the detailed application for 654 new homes would not in itself require mitigation for the site constraints but that this would occur as a result of the outline proposal. Therefore, a contribution would be secured against the outline application, details of which would be agreed between the applicant and TfL at that stage.

237. 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. It would therefore be appropriate to consider further funding for these works through the Community Infrastructure Levy (CIL) and/or other funding sources, although the spending of CIL would be subject to a separate regulatory and decision-making process within the Council and any decisions.
238. The impact on capacity at Harrow-on-the-Hill, Kenton and South Kenton stations has also been assessed. At Harrow-on-the-Hill, the outline development as a whole is expected to generate an increase of 18.7% of passengers boarding on the westbound Metropolitan Line in the AM peak, and 16.9% alighting in the PM peak, compared to the 2031 baseline. At Kenton station, the impact would be marginal (due to previous journeys 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.
239. In terms of capacity on trains, the outline 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. CIL funding, together with s106 contributions from other developments in the locality, could also potentially contribute to improvements to these stations.

Public transport – buses

240. 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.
241. Some changes to the bus services serving the Hospital are proposed as part of the outline application ref 20/0700. These have been agreed in principle with TfL and a number would also be secured under the detailed highways application ref 20/0677 and would come into effect following construction of the spine road. However, other changes would only come into effect following the development of the residential Phase 3 of the outline site. This development would provide a triangular route, with an east-west road connecting the main street to the eastern section of the Hospital ring road. At that stage, the intention would be to divert one of the existing bus services to loop round this triangular route. In terms of this detailed application, the proposed carriageway width of 6.5m would be sufficient to accommodate buses and so would not prejudice the rerouting of bus services in the future.
242. 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. The timing and amount of this contribution is under discussion between the applicant and TfL, but it would not be required in relation to this application, which does not directly propose any alterations to bus services.

Travel Plans

243. A Residential Travel Plan has been submitted and, as part of the measures and incentives proposed, a car club vehicle would be provided on site, together with three years free car club membership for residents. A Framework Travel Plan for the commercial units has also been provided. It is considered that the Travel Plans could be developed further to provide a wider range of measures and incentives to encourage use sustainable transport modes, for example by supporting local cycle training and creating a cycle user group. Modal shift targets should also be provided, and Travel Plan Co-ordinators identified.

244. These issues could be addressed through the submission of detailed Travel Plans which would be secured, together with monitoring and review arrangements, through the s106 agreement.

Encouraging active travel in surrounding area

245. 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.
246. 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.
247. 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.
248. 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

249. 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 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 (514 units: Blocks	2021 Q1 - 2024 Q2	Arrangements for temporary nursery

C1, C2, C3 and C4)		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 (140 units, commercial and nursery space: Block B1)	2025 Q1 - 2028 Q2	The new energy centre (reference 19/4272) would need to be completed and operational prior to the decommissioning and demolition of the boiler house.

Equalities

250. 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

251. 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.

252. Whilst the provision of external amenity space for some blocks falls slightly short of Brent's policy standard, this is considered to be more than adequately compensated for by the overall quality of the amenity space provided and of the additional areas of public realm. 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.

CIL DETAILS

This application is liable to pay **£23,263,739.08** * 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): 5195 sq. m.

Total amount of floorspace on completion (G): 70923 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) Shops	1372		1271.5	£40.00	£0.00	£75,836.08	£0.00
(Brent) Non-residen institutions	405		375.33	£0.00	£0.00	£0.00	£0.00
(Brent) Dwelling houses	69146		64081.16	£200.00	£0.00	£19,109,918.1	£0.00
(Mayoral) Shops	1372		1271.5	£0.00	£60.00	£0.00	£78,888.31
(Mayoral) Non-residen institutions	405		375.33	£0.00	£60.00	£0.00	£23,287.00

(Mayoral) Dwelling houses	69146		64081.16	£0.00	£60.00	£0.00	£3,975,809.5
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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	
TOTAL CHARGEABLE AMOUNT	£19,185,754.18	£4,077,984.90

*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: 20/0701

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:

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

and accompanied by plans or documents listed here:
See Condition 2

at **Land adjacent to Northwick Park Hospital, Nightingale Avenue, London, HA13GX**

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: 01/12/2020

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 proposal is in general accordance with the following documents:

Adopted Policy

- The National Planning Policy Framework (2019)
- The London Plan (2016 – Consolidated with alterations since 2011)
- Brent's Core Strategy (2010)
- Brent's Development Management Policies (2016)

Emerging Policy

- The Intend to Publish London Plan (2019)
- Brent's Local Plan (Reg 19 Version – 2019)

Supplementary Planning Guidance / Documents

- Mayor of London's Affordable Housing and Viability SPG (2017)
- Mayor of London's Housing SPG (2016)
- SPD1 Brent Design Guide (2018)

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

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

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

Location Plan: NP-PRP-XX-XX-DR-A-2200: P2
Existing Site Plan: NP-PRP-XX-XX-DR-A-2201: P1
Existing Plans and Elevations: NP-PRP-XX-XX-DR-A-2220: P1
Proposed Site Plan: NP-PRP-XX-XX-DR-A-2230: P2
Block B1 Proposed Ground Floor Plan: NP-PRP-B1-00-DR-A-2300: P0
Block B1 Proposed First Floor Plan: NP-PRP-B1-01-DR-A-2301: P1
Block B1 Proposed Second Floor Plan: NP-PRP-B1-02-DR-A-2302: P0
Block B1 Proposed Third Floor Plan: NP-PRP-B1-03-DR-A-2303: P0
Block B1 Proposed Fourth Floor Plan: NP-PRP-B1-04-DR-A-2304: P0
Block B1 Proposed Fifth Floor Plan: NP-PRP-B1-05-DR-A-2305: P0
Block B1 Proposed Sixth Floor Plan: NP-PRP-B1-06-DR-A-2306: P0
Block B1 Proposed Seventh Floor Plan: NP-PRP-B1-07-DR-A-2307: P0
Block B1 Proposed Eighth Floor Plan: NP-PRP-B1-08-DR-A-2308: P0
Block B1 Proposed Ninth Floor Plan: NP-PRP-B1-09-DR-A-2309: P0
Block B1 Proposed Tenth Floor Plan: NP-PRP-B1-10-DR-A-2310: P0
Block B1 Proposed Eleventh Floor Plan: NP-PRP-B1-11-DR-A-2311: P0
Block B1 Proposed Twelfth Floor Plan: NP-PRP-B1-12-DR-A-2312: P0
Block B1 Proposed Thirteenth Floor Plan: NP-PRP-B1-13-DR-A-2313: P0
Block B1 Proposed Fourteenth Floor Plan: NP-PRP-B1-14-DR-A-2314: P0
Block B1 Proposed Roof Plan: NP-PRP-B1-15-DR-A-2315: P0
Block B1 Proposed Elevations Sheet 1: NP-PRP-B1-XX-DR-A-2340: P0
Block B1 Proposed Elevations Sheet 2: NP-PRP-B1-XX-DR-A-2341: P0
Block B1 Proposed Elevations Sheet 3: NP-PRP-B1-XX-DR-A-2342: P0
Proposed Site Sections Sheet 1: NP-PRP-BC-XX-DR-A-2250: P2
Proposed Site Sections Sheet 2: NP-PRP-BC-XX-DR-A-2251: P1

Proposed Site Sections Sheet 3: NP-PRP-BC-XX-DR-A-2252: P1
 Block C1 Proposed Ground Floor Plan: NP-PRP-C1-00-DR-A-2400: P0
 Block C1 Proposed First Floor Plan: NP-PRP-C1-01-DR-A-2401: P0
 Block C1 Proposed Second Floor Plan: NP-PRP-C1-02-DR-A-2402: P1
 Block C1 Proposed Third Floor Plan: NP-PRP-C1-03-DR-A-2403: P1
 Block C1 Proposed Fourth Floor Plan: NP-PRP-C1-04-DR-A-2404: P1
 Block C1 Proposed Fifth Floor Plan: NP-PRP-C1-05-DR-A-2405: P1
 Block C1 Proposed Sixth Floor Plan: NP-PRP-C1-06-DR-A-2406: P1
 Block C1 Proposed Seventh Floor Plan: NP-PRP-C1-07-DR-A-2407: P1
 Block C1 Proposed Eighth Floor Plan: NP-PRP-C1-08-DR-A-2408: P0
 Block C1 Proposed Ninth Floor Plan: NP-PRP-C1-09-DR-A-2409: P0
 Block C1 Proposed Tenth Floor Plan: NP-PRP-C1-10-DR-A-2410: P0
 Block C1 Proposed Eleventh Floor Plan: NP-PRP-C1-11-DR-A-2411: P0
 Block C1 Proposed Twelfth Floor Plan: NP-PRP-C1-12-DR-A-2412: P0
 Block C1 Proposed Roof Plan: NP-PRP-C1-13-DR-A-2413: P0
 Block C1 Proposed Elevations Sheet 1: NP-PRP-C1-XX-DR-A-2440: P0
 Block C1 Proposed Elevations Sheet 2: NP-PRP-C1-XX-DR-A-2441: P0
 Block C1 Proposed Internal Elevations Sheets 1: NP-PRP-C1-XX-DR-A-2442: P0
 Block C1 Proposed Internal Elevations Sheet 2: NP-PRP-C1-XX-DR-A-2443: P0
 Block C2 Proposed Ground Floor Plan: NP-PRP-C2-00-DR-A-2500: P1
 Block C2 Proposed First Floor Plan: NP-PRP-C2-01-DR-A-2501: P1
 Block C2 Proposed Second Floor Plan: NP-PRP-C2-02-DR-A-2502: P1
 Block C2 Proposed Third Floor Plan: NP-PRP-C2-03-DR-A-2503: P1
 Block C2 Proposed Fourth Floor Plan: NP-PRP-C2-04-DR-A-2504: P1
 Block C2 Proposed Fifth Floor Plan: NP-PRP-C2-05-DR-A-2505: P1
 Block C2 Proposed Sixth Floor Plan: NP-PRP-C2-06-DR-A-2506: P0
 Block C2 Proposed Seventh Floor Plan: NP-PRP-C2-07-DR-A-2507: P0
 Block C2 Proposed Roof Plan: NP-PRP-C2-08-DR-A-2508: P0
 Block C2 Proposed Elevations Sheet 1: NP-PRP-C2-XX-DR-A-2540: P0
 Block C2 Proposed Elevations Sheet 2: NP-PRP-C2-XX-DR-A-2541: P1
 Block C3 Proposed Ground Floor Plan: NP-PRP-C3-00-DR-A-2600: P0
 Block C3 Proposed First Floor Plan: NP-PRP-C3-01-DR-A-2601: P1
 Block C3 Proposed Second Floor Plan: NP-PRP-C3-02-DR-A-2602: P1
 Block C3 Proposed Third Floor Plan: NP-PRP-C3-03-DR-A-2603: P1
 Block C3 Proposed Fourth Floor Plan: NP-PRP-C3-04-DR-A-2604: P1
 Block C3 Proposed Fifth Floor Plan: NP-PRP-C3-05-DR-A-2605: P1
 Block C3 Proposed Sixth Floor Plan: NP-PRP-C3-06-DR-A-2606: P0
 Block C3 Proposed Seventh Floor Plan: NP-PRP-C3-07-DR-A-2607: P0
 Block C3 Proposed Roof Plan: NP-PRP-C3-08-DR-A-2608: P0
 Block C3 Proposed Elevations Sheet 1 NP-PRP-C3-XX-DR-A-2640: P0
 Block C3 Proposed Elevations Sheet 2: NP-PRP-C3-XX-DR-A-2641: P1
 Block C4 Proposed Ground Floor Plan: NP-PRP-C4-00-DR-A-2800: P1
 Block C4 Proposed First Floor Plan: NP-PRP-C4-01-DR-A-2801: P1
 Block C4 Proposed Second Floor Plan: NP-PRP-C4-02-DR-A-2802: P1
 Block C4 Proposed Third Floor Plan: NP-PRP-C4-03-DR-A-2803: P1
 Block C4 Proposed Fourth Floor Plan: NP-PRP-C4-04-DR-A-2804: P1
 Block C4 Proposed Fifth Floor Plan: NP-PRP-C4-05-DR-A-2805: P1
 Block C4 Proposed Sixth Floor Plan: NP-PRP-C4-06-DR-A-2806: P0
 Block C4 Proposed Seventh Floor Plan: NP-PRP-C4-07-DR-A-2807: P0
 Block C4 Proposed Roof Plan: NP-PRP-C4-08-DR-A-2808: P0
 Block C4 Proposed Elevations Sheet 1: NP-PRP-C4-XX-DR-A-2840: P1
 Block C4 Proposed Elevations Sheet 2: NP-PRP-C4-XX-DR-A-2841: P1

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.

- 3 The scheme hereby approved shall contain 654 residential units as detailed in the drawings hereby approved, unless other agreed in writing by the Local Planning Authority.

The residential units hereby approved shall at no time be converted from use class C3

residential to a use class 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 equivalent provision in any order revoking and re-enacting that Order) without express planning permission having first been granted by the Local Planning Authority.

Reason: In the interests of proper planning. To ensure that an adequate standard of accommodation is maintained in all of the residential units and in view of the restricted space within the site to accommodate additional bin or cycle storage.

- 4 The scheme hereby approved shall contain 1,178sqm (GIA) of commercial floor space (use classes E(a) and E(b) as defined by The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) and 412sqm of nursery floor space (use class E(f) as defined by The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) which shall not be used other than for these purposes unless otherwise agreed in writing by the Local Planning Authority, notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification) and the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification).

Notwithstanding any internal reconfiguration of the commercial floorspace, no individual commercial unit shall exceed 499sqm in area at any time.

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

- 5 The development hereby approved shall be built so that no fewer than 589 of the residential units achieve Building Regulations requirement M4(2) – ‘accessible and adaptable dwellings’ and that no fewer than 65 of the residential units achieve Building Regulations requirement M4(3) – ‘wheelchair user dwellings’.

Reason: To ensure that the development achieves an inclusive design in accordance with London Plan Policy 3.8.

- 6 The cycle storage and bin storage facilities as shown on the approved plans shall be installed prior to occupation of the relevant building that they serve and thereafter retained and maintained for the life of the development and not used other than for purposes ancillary to the occupation of the building hereby approved, unless alternative details are agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is fit for purpose.

- 7 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.

- 8 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.

- 9 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 and London Plan policies 5.3 and 7.14.

- 10 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.

- 11 The development hereby approved shall not be commenced until a phasing plan showing the location of all phases, the sequencing for those phases, and indicative timescales for their delivery is submitted to and approved by the Local Planning Authority in writing. 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 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).

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.

- 12 Prior to the commencement of any Phase of the development a Construction Method Statement relevant to that Phase shall be submitted to and agreed in writing by the Local Planning Authority through the submission of an application for approval of details reserved by condition, outlining measures that will be taken to control dust (including measures to mitigate the impact of dust and fine particles), noise and other environmental impacts of the development during the construction works. .

The works shall thereafter be carried out in full accordance with the approved Construction Method Statement.

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.

- 13 Prior to commencement of any Phase of the development hereby approved, a construction logistics plan relevant to that 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:

- i. Forecast construction trip generation and mitigation proposed;
- ii. Site access arrangements and booking systems;
- iii. Construction phasing;
- iv. Vehicular routes to the site;
- v. Measures to improve safety for vulnerable road users and avoid conflict with routes used by hospital patients, visitors and those attending university;
- vi. 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.

- 14 Prior to the commencement of any Phase of the development a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the local planning authority. The CEMP shall provide further details of how ecological interests shall be protected during the demolition and construction works for that Phase, in accordance with the recommendations of the approved Environmental Statement Chapter 12: Ecology.

Reason: To ensure ecological interests are protected during the demolition and construction period.

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

- 15 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.

- 16 Prior to the demolition of the existing buildings known as T Block / TTT Block, sufficient evidence to demonstrate that the NHS Trust facilities provided therein have been satisfactorily relocated elsewhere within the Northwick Park Hospital site shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure the application does not compromise the delivery of healthcare services.

- 17 Following the demolition of existing buildings on site and prior to the commencement of building works on any Phase:

- (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.

Any soil contamination remediation measures required by the Local Planning Authority shall be carried out in full. A verification report shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation or use of the development, 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).

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

- 18 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 5.6.

- 19 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations) on any Phase, a plan indicating the provision of electric vehicle charging points for the approved car parking spaces for that Phase within the site 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. Thereafter, the agreed electric vehicle charging points shall be provided and made available for use prior to occupation of that phase of the development.

The provision of electric vehicle charging points shall be in accordance with adopted London Plan standards, providing at least 20% active charging points with passive charging provision for the remaining spaces..

Reason: To encourage the uptake of electric vehicles as part of the aims of the adopted London Plan policy 6.13.

- 20 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations), a RIBA Stage 3 Fire Strategy prepared by a suitably qualified third party consultant shall be submitted to and approved in writing by the Council. The development 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 draft London Plan (intend to publish version) 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 the Intend to Publish London Plan Policy D12.

- 21 Prior to the commencement of construction works (excluding demolition, site clearance and the laying of foundations) on any Phase, details of materials of the development, for all external work, including samples which shall be made available for viewing in an agreed location, shall be submitted to and approved in writing by the Local Planning Authority.

The work shall be carried out in accordance with the approved details.

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

22 Within six months of works commencing on any Phase, and notwithstanding the approved plans, a detailed landscaping scheme relating to that Phase 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.. The scheme shall include detailed proposals for the following aspects:

- Hard landscaped areas including materials samples, level changes, informal seating and other street furniture
- 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.;
- 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 hard and soft landscaping proposals for the courtyard of Block B1, including informal seating;
- Details of a pedestrian and cycle path of 3m width, to the south of Block C4 ending at the boundary with Northwick Park;
- Details of how vehicle access to side streets 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 and cycle 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 so as to prevent the use of these for informal parking and to contribute to the amenity of residents;
- Details of electric vehicle charging points to be provided for any on-street parking spaces proposed.

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 to those originally planted.

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.

23 Within six months of commencement of works on any Phase of the development, further details of proposed replacement tree planting within the relevant Phase, including species, exact locations and tree pit designs, shall be submitted to and approved in writing by the local planning authority. The number of trees to be planted (excluding any temporary trees) shall not be less than 208 in total, 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.

All tree planting shall be carried out prior to first use of the development. Any tree that is part of the approved scheme that within a period of five years after planting is removed, dies or becomes seriously damaged or diseased, shall be replaced in the next planting season and all planting shall be replaced with others of a similar size and species and in the same positions, unless the Local Planning Authority first gives written consent to any variation.

Reason: 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.

- 24 Prior to development commencing above ground floor level on any block or building or in relation to a Phase of development, further details of wind mitigation measures for any residential balconies on that building or in that Phase 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 7.9.

- 25 Within six months of commencement of work on site, 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 5.2.

- 26 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

- 27 Prior to first occupation or use of the development, a Meanwhile Use Strategy 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

- 28 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.

- 29 Prior to first occupation or use of the development, a Frontage and Signage Strategy for the 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.

- 30 Prior to first occupation or use of the 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.

- 31 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

- 32 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.

- 33 Prior to first occupation or use of the relevant units, and notwithstanding the approved plans, further details of cycle parking shall be submitted to and approved in writing by the local planning authority to include:

Cycle storage for the 3bed mews houses to comply with London Cycling Design Standards (2m width);

Long stay cycle storage including showering and changing facilities for each of the commercial units;

All cycle parking shall be provided in full accordance with the approved plans or the details approved under this condition as relevant, prior to first occupation or use of the relevant units.

Reason: To ensure adequate cycle parking for the development.

- 34 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.

No Car Park Management Plan shall be required for Block B1. However the Car Park Management Plan relating to Block C2 shall set out how parking spaces will be provided for any Blue Badge holders resident in Block B1, and no occupation of the residential units in Block B1 or Block C2 shall take place prior to the submission and approval of this Car Park Management Plan.

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.

- 35 Prior to first occupation or use of the relevant Phase or building, 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.

- 36 Prior to first occupation or use of any residential unit within any building, the results of sound tests to show that the required internal noise levels for that building, as set out below, have been achieved shall be submitted to and approved in writing by the local planning authority.

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:

Time	Area	Maximum noise level
Daytime	Living rooms and bedrooms	35 dB LAeq (16hr)
07:00 – 23:00	Outdoor amenity	55 dB LAeq (1h)
Night time		
23:00 – 07:00	Bedrooms	30 dB LAeq (8hr)

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

- 37 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

- 38 Ecological monitoring:
- Within two months of practical completion of the development, an ecological survey of the site shall be conducted and the results submitted to and approved in writing by the local planning authority.
 - Within two years and two months of practical completion of the development, 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

- 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.
- 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 to obtain a section 61 application form. Please note that the council has 28 days to process such applications.
- 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.
- The Council recommends that the maximum standards for fire safety are achieved within the development.

- 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.
- 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. Application forms should be completed on line via https://urldefense.proofpoint.com/v2/url?u=http-3A__www.thameswater.co.uk&d=DwIFaQ&c=OMjwGp47Ad5otWI0__lpOg&r=G_hzVySAkixNNJR_FDWFjexJLES8DRQ06qKk&m=u9DczQn4pNG-UoIMJm2JUweQQh3yMPN41iu6pEvCfhQ&s=1CF9hwvXbrpLI7CCtc_8nujeH4Hjbo7WQnU-m40kU&e=. Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 8 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