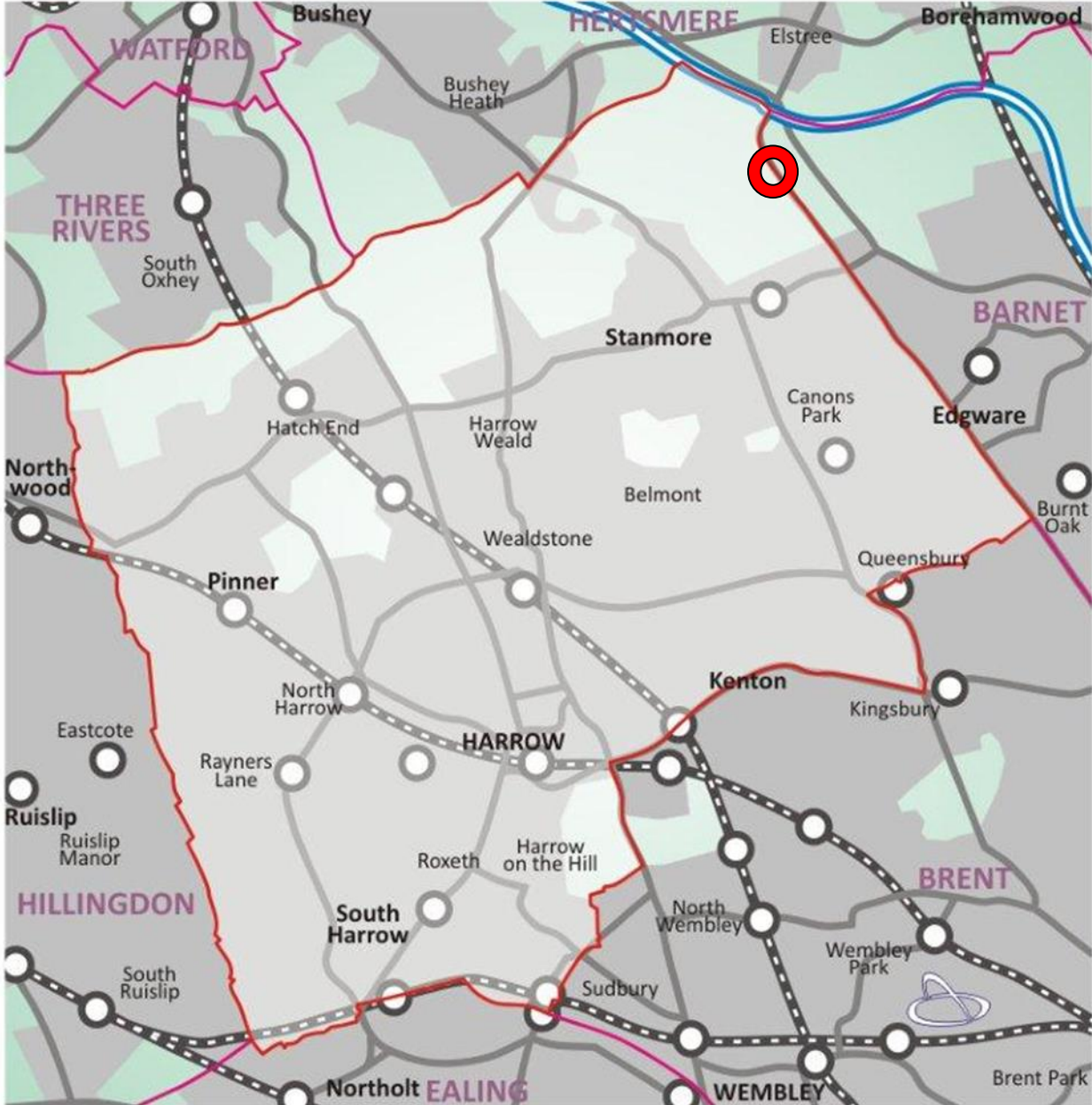


 = application site



**Royal National Orthopaedic Hospital NHS Trust, Brockley P/4341/22  
Hill, Stanmore, HA7 4LP**

## Location Plan



# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

19<sup>th</sup> July 2023

**APPLICATION NUMBER:** P/4341/22  
**VALID DATE:** 26/01/2023  
**LOCATION:** ROYAL NATIONAL ORTHOPAEDIC HOSPITAL,  
BROCKLEY HILL, STANMORE  
**WARD:** STANMORE  
**POSTCODE:** HA7 4LP  
**APPLICANT:** RNOH  
**AGENT:** TEMPLE  
**CASE OFFICER:** NICOLA RANKIN  
**EXPIRY DATE:** 22/03/2023 (EXTENDED EXPIRY DATE 28/09/2023)

### PROPOSAL

Single storey surgical theatre facility with associated rooms and link corridor to adjacent wards; associated ancillary buildings including substation and generator; proposed vehicle access; associated earth works and landscaping

### RECOMMENDATION A

The Planning Committee is asked to:

- 1) Agree the reasons for approval and the conditions as set out this report in appendix 1; and
- 2) Refer this application to the Mayor of London (the GLA) as a Stage 2 referral and the Secretary of State
- 3) Subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the local planning authority for the purposes of determining the application and the Secretary of State not Calling in the Application, delegate authority to the Chief Planning Officer in consultation with the Director of Legal and Governance Services for the continued negotiation and completion of the Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement.

The Section 106 Agreement Heads of Terms would cover the following matters:

- a) Travel Plan
- b) Carbon Off set contribution
- c) Legal Costs, Administration and Monitoring: A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

### **REASON FOR THE RECOMMENDATION**

The proposed development would result in limited visual harm to the Green Belt and a modest amount of spatial harm. As such the proposal is an inappropriate development in the Green Belt. Nevertheless, the applicant has provided a case of Very Special Circumstances setting out the pressing need to reduce the waiting time for surgery following the COVID 19 Pandemic. Officers accept that there is an acute need for this facility, which is required to provide additional medical capacity.

There will be some impacts on biodiversity value of the site, but this can be off set through securing additional net gain on the site and elsewhere around the RNOH site.

The proposal would result in a sustainable and energy efficient building which would have an acceptable impact on the character and appearance of the surrounding area.

In conclusion, given the limited harm that would be caused to the Green Belt and balancing this against the very special circumstances of providing an additional medical facility to meet demand, officers conclude that very special circumstances decisively outweigh any harm to Green Belt.

### **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 28<sup>th</sup> September 2023 (or such period as the Council may determine) of the date of the Committee decision on this application, then it is recommended to delegate the decision to **REFUSE** planning permission to the Divisional Director of Planning on the grounds that:

The proposed development, in the absence of a legal agreement to secure necessary agreement and commitments in relation to energy, sustainability and sustainable travel would fail to mitigate the impact of the development resulting in an unsustainable development on the application site, contrary to the National Planning Policy Framework (2021), London Plan 2021 policies SI2 and SI3, Harrow Core Strategy 2012 policies CS1 R and T and Harrow Development Management Polices Local Plan (2013) policies DM43, and DM50.

## **INFORMATION**

This application is reported to Planning Committee as the application is for a major development. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a) – 1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type:	<b>Major Development</b>
Council Interest:	N/A
Gross additional Floorspace:	
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	n/a
Local CIL requirement:	n/a

## **HUMAN RIGHTS ACT**

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

## **EQUALITIES**

In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

## **S17 CRIME & DISORDER ACT**

Policy D11 of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, had the proposal been considered acceptable a condition would have been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

## 1.0 **SITE DESCRIPTION**

- 1.1 The Royal National Orthopaedic Hospital (RNOH) is a 41.45 hectare site which is located within the Green Belt at the north-east of the London Borough of Harrow. The RNOH is nationally and internationally renowned as a specialist orthopaedic hospital.
- 1.2 The site is of strategic planning importance. It is one of two strategic developed sites in the Green Belt, as defined by the Site Allocations Development Plan Document (DPD) and the Development Management Policies DPD.
- 1.3 The buildings across the site are of varying ages and conditions, from the original main building (Eastgate House) built in the 1880s to the blocks of the 1920s and 1930s, some prefabricated 1940s huts as well as latter additions in the 1970s and 1980s.
- 1.4 There have been some latter additions to the wider hospital site such as the Stanmore building which was completed in 2018 and was brought forward under the hybrid masterplan for the site approved under planning permission P/3912/12.
- 1.5 The topography of the site is varied and the hospital campus is set amongst an undulating landscape, consisting of trees, woodland and grassland.
- 1.6 The main pedestrian and vehicle entrance to the hospital campus is from Brockley Hill and from there a large spinal road links the site from the east to the west.
- 1.7 The application site boundary is shown below:



- 1.8 The site is a grassed area with a hard standing path to the west, leading to the disused helicopter pad and a hospital estate path along its southern edge and within

the south eastern part of the site. The site is mostly enclosed by other surrounding hospital buildings.

- 1.9 The site is covered by a Tree Preservation Area Order and is within the Harrow Weald Ridge Area of special character.
- 1.10 The main access into the site is through the hard standing path between the Sir Herbert Seddon Teaching Centre and the Pharmacy and Coxen Ward which is used primarily by pedestrians and the occasional service vehicle.
- 1.11 The site has a PTAL of 1a with the nearest public transport being from Brockley Hill where buses 107 and 324 runs services to and from Elstree, New Barnet, Edgware and Brent Cross.
- 1.12 Stanmore London Underground Station is located 1.4 miles to the south of RNOH. It is the northern terminus of the Jubilee line running through to central London.
- 1.13 The RNOH provides a courtesy car service Monday to Friday for staff, patients and visitors, where vehicles pick up and drop off individuals from the taxi rank/bus stop outside Stanmore Station and drop off on the RNOH site at various dedicated drop down areas including Orthotics, Outpatients Department and the Main Gate.

## **2.0 PROPOSAL**

- 2.1 The proposal seeks planning permission for:
- Erection of a *temporary*, single storey new surgical theatre facility providing theatres and associated rooms, with electrical and mechanical plant; associated earth works and landscaping
  - A covered link corridor to adjacent wards; and
  - Widening of existing hardstanding path to create a new vehicular access within the Hospital Campus.
  - Earth works and landscaping
- 2.2 The applicant outlines that the proposed development is an interim development that is required to meet RNOH's clinical demand up until the new theatres within the approved masterplan (P/3912/12) come forward either under the approved masterplan or a new masterplan.
- 2.3 The new surgical theatre facility will provide:
- 4 surgical theatres
  - 2 recovery rooms
  - Associated facilities such as staff changing room and toilets
- 2.4 A covered link corridor is proposed to connect the new building to the existing wards (Ward 4 building and internal 'Hospital Street' to the west of the application site).
- 2.5 The proposed building will have 1350sqm of floorspace.

- 2.6 The building will be of modular prefabricated construction.
- 2.7 The proposed development is proposed to be car free.
- 2.8 A new vehicular and access road for fire and waste access is proposed from the east of the site, within the Hospital estate. The access has been designed to be 3.7 metres wide to accommodate a fire tender. The route has been designed to include a turning head to accommodate both fire tender and a 7.5t box van refuse collection.
- 2.9 Following a site inspection to the site at the beginning of May, it was observed that the development has commenced on site and a large part of the structure has already been built.

### **Amendments to the scheme since the submission of application**

- 2.10 The following amendments to the scheme have been submitted:
- Reposition of ancillary plant towards the southern boundary of the site
  - Provision of an additional 6 cycle parking units (and within the building associated shower and changing facilities)
  - Clarification of landscape earth works surrounding the building footprint
  - Installation of an emergency diesel generator near the south eastern boundary of the site
  - Installation of vehicular barrier at the new access road
  - Erection of roof covering over the refuse storage
  - Addition of green roofs to the ancillary buildings
  - Introduction of a footpath connecting the ancillary buildings to the walkway

### **3.0 RELEVANT PLANNING HISTORY**

- 3.1 A summary table of the relevant planning history is set out in the table below:

<b><u>Application Ref:</u></b>	<b><u>Description</u></b>	<b><u>Status and Date of Decision</u></b>
P/2152/16	Reserved matters application (condition 4) for all matters (scale appearance layout access landscaping) pursuant to hybrid planning permission reference p/3191/12 (for the phased comprehensive, redevelopment of the royal national orthopaedic hospital) for the development of phase 2a. construction of a 5 storey building of 8,480 sq (gifa) of	Granted 26/07/2016



	<p>hospital floorspace (c2 use class), including inpatient accommodation, rehabilitation space, consultancy space, patient care facilities and other ancillary clinical and service related development. development to also include associated landscaping and fences, access, bin stores, facilities management yard, pedestrian links and ancillary works</p>	
P/3191/12	<p>Hybrid planning application for the comprehensive, phased, redevelopment of the Royal National Orthopaedic Hospital ("the Development"). The application is accompanied by an Environmental Statement. The development comprises two elements:</p> <p>An Outline Element - ("the Outline Element") To include: Up to 56,871sqm (Gross Internal Floor Area) of new hospital development, including rehabilitation unit and parent accommodation (Use Class C2); Up to 21,000 sqm (Gross Internal Floor Area) multi storey car park providing up to 805 car parking spaces; Up to 88 surface car parking spaces and up to 50 undercroft car parking spaces for operational hospital use; Up to 40,260 sqm (Gross Internal Floor Area) of residential development (Use Class C3) (including ancillary floorspace i.e. garages and undercroft parking) providing up to 356 residential units of which up to 45 units will be for staff accommodation (36 proposed and 9 existing); Partial change of use of Eastgate House from office to private residential (Use Class C3);</p>	<p>Granted 05/08/2013</p>

	<p>Up to approximately 19.2 hectares of public open space; Associated landscaping and ancillary works; Closure of existing access at north-eastern end of Wood Lane.</p> <p>A Detailed Element - ("the Detailed Element") Permanent: Demolition of four structures (incinerator, patients centre, Moor House Cottage and Moor House store); Realignment and alterations to the existing service road and access from the south-western end of Wood Lane; Provision of a new internal road and a new internal access point to the Aspire National Training Centre; Provision of a total of 75 car parking spaces for the Aspire National Training Centre; Associated lighting, drainage and landscape works.</p> <p>Temporary (5 years) - Construction of an area of hard standing to accommodate 121 car parking spaces, Erection of a 3m high fence to enclose the existing boiler house, Works to the existing estates compound; Associated lighting, drainage and landscape work</p>	
P/0083/10	Extension to the time limit for implementing outline planning permission p/1704/05/cou dated 15/01/2007 for partial redevelopment to provide new hospital and associated facilities, housing (including staff), revised road junction, car parking and open space	Granted 04/06/2010
P/0963/09	Demolition of graham hill unit and construction of three storey ronald mcdonald house (sui generis).	Granted 04/02/2010
P/1704/05/COU	Outline: partial redevelopment to provide new hospital and associated facilities, housing (including staff), revised road	Granted 05/01/2007

	junction, car parking and open space	
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#### 4.0 **CONSULTATION**

- 4.1 A total of 17 consultation letters were sent to neighbouring properties regarding this application on the 26<sup>th</sup> January 2023.
- 4.2 A site notice was posted on 3<sup>rd</sup> May 2023 (Major Development/Departure from Development Plan).  
Press Advert published (Major Development/Departure from Development Plan) on 2<sup>nd</sup> February 2023.
- 4.3 The overall public consultation period expired on 16<sup>th</sup> February 2022 and no objections were received.
- 4.4 Statutory and Non-Statutory Consultation
- 4.5 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

Consultee and Summary of Comments
<p><b><u>Greater London Authority:</u></b> More information required to confirm compliance with the London Plan (2021).</p> <p>London Plan policies on Green Belt, urban design, sustainable development, environmental issues, and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:</p> <ul style="list-style-type: none"> <li>• Land Use Principles: The proposal would involve development on land within a previously developed site, which would have some (limited) harm to the openness of the Green Belt. Very Special Circumstances have been demonstrated in this case that would outweigh this harm.</li> <li>• Urban Design: No strategic issues are raised regarding the design of this functional building, however, further information is required on landscaping and planting.</li> <li>• Sustainable development and Environmental issues: Further information is required on energy, circular economy, whole life-circle carbon assessment, urban greening, loss of trees, and biodiversity.</li> <li>• Transport: Further revisions of the proposal are required to confirm that the application complies with the transport policies in the London Plan.</li> </ul> <p><b><u>Transport for London:</u></b> No objection in principle, further information required</p>

- Access arrangement for cyclists, such as proposed cycle parking and access routes
- Concerns regarding the delivery and servicing arrangements and risks of informal parking
- Further work is required to demonstrate how the development will deliver improvements that support the ten Healthy Streets Indicators and facilitate secure and inclusive active travel, particularly in hours of darkness
- The way in which the framework Travel Plan reflects the development. A TP, CLP and DSP should all be secured by legal agreement

**LBH Highways Authority:** The only objection relates to the cycle parking.

This is a very large and sprawling site. There is currently one cycle store for 28 cycles and the hospital states that currently only 5 cycles are parked here. A large sprawling site should have several small cycle stores near the entrances to different wings and blocks as cyclists do not feel their cycles are safe or can be easily checked upon if they are parked outside a different block to that in which they work.

For this reason I recommend the addition of a secure and covered cycle store for 5 to 10 cycles near the entrance to the new extension.

**LBH Landscape Officer:** No Objection, subject to conditions

2 'B' grade trees are to be removed to enable the development. There should be replacement tree planting and these should be incorporated into the landscape design proposals. An access road which runs over the RPA – root protection areas of existing trees, and therefore the construction of the road in the RPA areas will need to be no dig, as noted in the tree report, and can be covered by a planning condition.

I note a flat roof is proposed with solar PV's. Could the roof incorporate a green roof, to enhance the biodiversity of the area. Bio solar PV's could be added to the roof, with native type of planting in between and under the PV panels.

**LBH Biodiversity Officer:** Objection

- There are a number of deficiencies and inconsistencies in the information supplied. These will need to be addressed.
- Whereas there are no in principle objections on biodiversity grounds to temporary development within the identified redline, the approach as proposed is unacceptable and will require modification via condition.
- Where mitigation of impacts and/or gain are to be provided these should, depending on site circumstances, either be delivered within the redline area or in a strategically useful location that would justify an offsetting approach. In this instance, that would have involved consideration of the whole site and identification of suitable locations. Instead, the applicants' approach is to enhance the biodiversity unit value of a separate area of amenity grassland

seeking to justify the overall reduction of habitat and potential habitat area- which is generally to be discouraged.

- The following conditions are recommended
  1. unless there are over-riding and acceptable reasons for not doing so, the new building be provided with an appropriately specified bio-solar roof rather than the suggested plain partial solar panel coverage. This would have both flood risk and biodiversity benefits, minimising overall loss of soft surface and habitat as well as being in keeping with the move to a more natural SuDS approach
  2. taking account of 1, there should be adequate natural SUDS provision over the hospital site to achieve natural run-off rates
  3. there will be appropriate planting of trees to fully replace the function of what would be lost (based on a CAVAT valuation)
  4. any mitigation or gain obligations – delivering a minimum 20% uplift based on corrected baseline valuations – should be appropriately targeted within the overall hospital site, taking account of biodiversity opportunities and constraints

**LBH Urban Design Officer:** No objection

The applicant should give consideration to the following points:

- Provision of landscaping, particularly around recovery room windows and on approach to the building (for building entrances and along covered walkways).
- The proposed development footprint could be made parallel with the existing building to the north.
- Substation and generator could be relocated eastwards to be adjacent to the equipment store.
- The design team is asked to ensure natural light is maximized.
- The use of covered external walkways to the north and west elevations is queried. Clarification must be provided as to why these are not fully internal and what such walkways will be used for.
- it would be highly beneficial for visual and architectural interest to be increased at patient-facing points in the building. For example, patterned or coloured glass panels to walkways and a distinct material treatment and furniture choice to entrance lobby could do this.
- A screen should be provided to screen plant at the roof level
- Covered walkways should be provided with some screening for protection against the rain.
- A green roof to increase biodiversity should be considered.

**LBH Drainage Authority:** No objection

I can confirm that sw condition can be discharged. The applicant has confirmed that there's no additional impermeable areas from the original application discharging to the existing pond.

**Brent Council:** No objection

**Secure by Design Officer:** No objection

All NHS buildings must achieve a Secured By Design award as it's a NHS policy. A condition is therefore recommended.

## **5.0 POLICIES**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:
- 5.2 'If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.'
- 5.3 The Government has issued the National Planning Policy Framework [NPPF 2021] sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of this application.
- 5.4 In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].
- 5.5 A full list of all the policies used in the consideration of this application is provided as Informative 1.

## **6.0 ASSESSMENT**

6.1 The main issues are;

- Principle of Development
- Character and Appearance of the Area
- Residential Amenity
- Traffic, Safety and Parking
- Biodiversity, Trees and Landscaping
- Energy and Sustainability
- Development and Flood Risk
- Accessibility and Fire Safety

### **6.2 Principle of Development**

The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: G2, S2
- Harrow Core Strategy 2012:CS1B, F

- Harrow Development Management Policies Local Plan (2013):DM1, DM6 DM16
- Site Allocations (2013)

### Masterplan and Site Allocation

- 6.2.1 The RNOH site is subject to a Hybrid Planning permission (Ref: P/3191/12) for the comprehensive phased redevelopment of the hospital site to provide new hospital buildings and residential development. The consent has been partially implemented through the construction of a new hospital building in the western part of the site (Ref: P/2152/16).
- 6.2.2 The image below shows four distinct development zones which were approved through the masterplan including the Central Development Zone (CDZ) allocated for hospital functions, the Eastern Development Zone (EDZ), the Western Development Zone (WDZ), allocated for residential development and the Northern Amenity Zone (NAZ).



- 6.2.3 As part of the evaluation of the preferred solution, the proposals for the surgical hub were considered within the context of the approved masterplan. It was deemed essential that the location of the development, considered by the applicant as temporary in nature, does not compromise the future redevelopment of the masterplan to enable future phases of hospital development come forward with minimum disruption to overall service delivery of the hospital. As such, the proposed location is outside the Central Development Zone of the approved masterplan intended for the main hospital development.

- 6.2.4 The delivery of the new theatre block in the CDZ is likely to be one of the last major phases of redevelopment, given its proposed location to the southern end of the clinical campus. As such, the proposed hub will need to remain in place until the new theatre complex is delivered. However, the availability of the EDZ for disposal is also not intended until the CDZ has been fully developed with all services accommodated within it. Therefore, the Hub will have been removed prior to the EDZ's disposal, thereby not compromising the residential layouts and principles prescribed in the masterplan.
- 6.2.5 It is therefore considered that the proposed location of the development would not compromise the ability of the applicant to continue to implement the masterplan for the site or a new masterplan. As such, there would be no conflict with the site allocation for site redevelopment.
- 6.2.6 Notwithstanding the above, it is considered that the proposed development should be considered as a standalone application for a permanent building as the timeframe for removal of the surgical hub and further future development of the site is unknown and the building could be on site for many years. As such, officers have not taken into account the temporary nature of the facility when weighing up its impact on the Green Belt.

#### Buildings in the Green Belt

- 6.2.7 London Plan Policy G2 states that the Green Belt should be protected from inappropriate development and, unless VSC exist, development that would harm the Green Belt should be refused. The NPPF in Paragraph 149 point (g) states that the construction of new buildings in the Green Belt should be regarded as inappropriate, except in specific circumstances.
- 6.2.8 One of the exceptions set out in Paragraph 149 point (g) of the NPPF is:
- 'limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
- *not have a greater impact on the openness of the Green Belt than the existing development; or*
  - *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'*
- 6.2.9 The site lies within a strategic developed site in the Green Belt, as defined by the Site Allocations Development Plan Document (DPD) and the Development Management Policies DPD. Whilst the application site is open grassland, the immediate surrounding land is highly developed with hospital buildings.
- 6.2.10 The proposed development would be a single storey structure which would be in keeping with the surrounding buildings in terms of height and massing. The accompanying Design and Access Statement demonstrates that the proposed



development would have very limited visibility in relation to both immediate and distant views into the site. As such, it is considered that the development will have limited visual impact on the openness of the Green Belt. Nevertheless, the introduction of the building in this location would have a greater spatial impact on openness of the Green Belt and therefore is not considered to fall within the exception 149(g) of the NPPF (2021). Therefore, the development is considered to constitute inappropriate development in the Green Belt.

6.2.11 The NPPF states that “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.” (Paragraph 147/148).

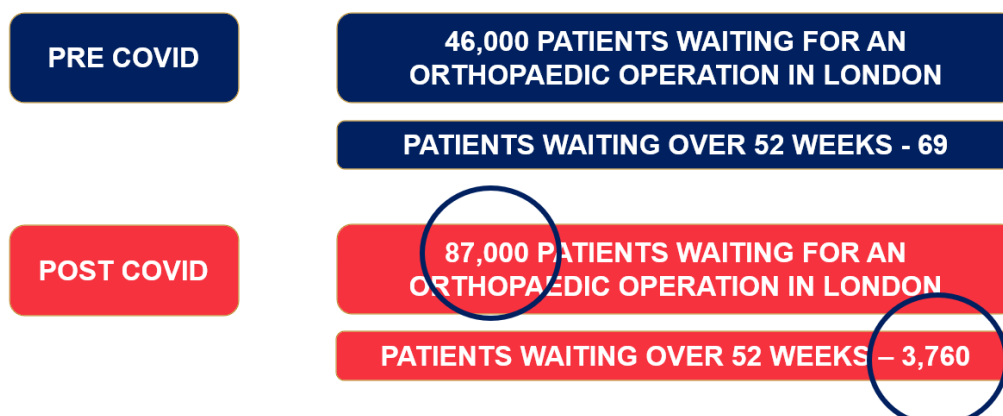
6.2.12 The applicant has put forward a case for VSC to justify the acceptability of the proposals:

Very Special Circumstances

6.2.13 The London Plan Policy S2 notes that development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need should be supported.

6.2.14 The applicant outlines that the proposed development at Stanmore is a critical piece of temporary medical infrastructure that is required following the backlog of surgery cases that accrued following the COVID-19 Pandemic. At present, the waiting times for patients to receive surgery has been extended from approximately 18 weeks up to as long as two years.

6.2.15 The following figures have been provided to give an indication for the timeframes for orthopaedic surgery in London



6.2.16 The proposed development has received direct funding approval from the Department of Health with the Secretary of State for Health confirming that the development must go ahead to ease waiting times for surgery.

6.2.17 The overall health and socio-economic impacts are summarised as follows:

- Reduced waiting times have significant health benefits, particularly for more vulnerable and lower socio-economic status patients;
- An additional £1.4m of direct gross value added (GVA) per annum, along with additional spend of around £50,000 per annum which will be created by new workers and be retained within the local economy;
- Modular hubs contribute to attracting and retaining high quality staff due to creating a recognised centre of excellence and providing an inspiring workplace;
- The RNOH will be able to build on existing clinical partnerships, offering mutual aid through increased capacity and access to training across the sector;
- There is evidence of increased patient satisfaction and wellbeing whilst receiving care in dedicated surgical hubs;
- Design of modular surgical hubs reduces impact on existing hospital services, reduces health and safety risk on site and provides ongoing operational benefits through a high-quality designed workspace; and
- The delivery of the modular hubs is less carbon intensive due to the factory-first construction and materials used within the design creating a reduced carbon footprint with resulting wider societal benefits.

6.2.18 The Applicant has assessed three alternative locations for the operating theatre. These are all within the RNOH campus because the facility is required to be delivered at the hospital to alleviate pressure on its existing services. All possible alternative locations are therefore within the Green Belt and development outside of the Green Belt is not feasible given the operation of the medical facility and synergy with existing hospital services.

6.2.19 In conclusion, given the limited harm that would be caused to the Green Belt and balancing this against the very special circumstances of providing an additional medical facility to meet demand, officers conclude that very special circumstances decisively outweigh any harm to Green Belt.

### 6.3 Character and Appearance of the Area

6.3.1 *The relevant policies are:*

- National Planning Policy Framework (2021)
- The London Plan 2021: D3
- Harrow Core Strategy 2012: CS1 B
- Harrow Development Management Policies Local Plan (2013): DM1, DM6 DM16

6.3.2 The proposal comprises a single storey building within a currently landscaped and open area between existing RNOH buildings. There is limited concern regarding the location of this building, which is located to adjoin to the building to the west, with a glazed covered link to this building part of the application. As outlined above, the proposed location of the surgical theatre facility has been determined for efficient

functionality and to ensure the potential future delivery of the master plan is not hindered.

### Massing, Scale & Built Form

- 6.3.3 The building height is considered to be acceptable and its proximity to existing buildings to the north and west is not considered to result in any overshadowing or overbearing impacts.
- 6.3.4 The enclosed link corridor to the south west of the theatres provide staff access to the theatres and would be used to transport patients from wards to operating theatres. The walkway would be enclosed and is accessible by non-ambulant patients and staff. The covered walkway connecting the theatre to the main building is located to the north west and wraps around the northern edge of the building. The walkways serves two purposes as a fire escape and for the egress of waste.
- 6.3.5 The proposal includes provision for a standalone generator and substation buildings. During the course of the application these buildings have been moved further to the south and east, thereby improving the visual outlook from the building and creating opportunity for further landscape.
- 6.3.6 The internal arrangement of spaces focuses on specialised surgical uses, including operating theatres and recovery rooms.
- 6.3.7 It is acknowledged that the proposed architectural design of the building is highly utilitarian. The Councils urban design officer has outlined that it would be highly beneficial for visual and architectural interest to be increased at patient-facing points in the building. However, the applicant has set out the way in which the design and scale of the building is a product of its required functionality and the lack of architectural visual interest to the building is not considered to be unacceptable in this case.
- 6.3.8 It is noted that the flat roof features a considerable amount of plant, PV panels and safety railings. This creates a cluttered and unsightly appearance and conveys a lack of resolution and refinement in the detailing of the buildings. It is considered that a parapet or perforated screen which can screen and enclose this plant from view at eye level is necessary and could be achieved at a low cost. A condition is therefore recommended in relation to this, should approval be granted.
- 6.3.9 The building sits within an open and lawned site. There is clear scope for a modest degree of landscaping, particularly around recovery room windows and on approach to the building (for building entrances and along covered walkways). Moreover, at least two trees have been removed to construct the building and it is considered necessary that replacement planting should be provided to mitigate their loss. Planning conditions for landscape works can be secured, should approval be granted.

6.3.10 As noted above the development has already commenced and a substantial part of the building has already been constructed. A large amount of earth works has taken place in order to construct the building. Detailed pre-existing and finished levels information has not been provided with the application. However, sectional plans have been provided showing the proposed height in relation to the surrounding buildings (see images below). Moreover, in officers' opinion, following a site visit, it is considered the building sits comfortably within the surrounding context. In this instance it is considered it would not be reasonable to impose a final levels condition on the building, given the works that have been undertaken to date. As such, it is considered that the proposal would not result in unreasonable harm to the character of the area and Green Belt, in the absence of a levels condition.



Section looking south



Section looking west

6.3.11 In summary, the proposal is considered to have an acceptable impact on the character and appearance of the surrounding area and would not cause adverse harm to the character of the Green Belt. The proposal would therefore comply with the above stated policies.

## 6.4 Residential Amenity

6.4.1 *The relevant policies are:*

- NPPF 2021
- The London Plan (2021) D3 (7), D13, D14
- Harrow Development Management Policies Local Plan (2013):DM1

6.4.2 There are no residential properties located in close proximity to the site. The nearest residential properties to the south are over 300 metre away and separated by Wood Lane. A Noise Assessment has been prepared by Temple which supports this application.

- 6.4.3 A noise survey and model of the proposed mechanical services has been used to assess the effects of the noise levels on the nearest noise sensitive receptors both on-site and off-site. This has been assessed in line with Harrow Council's guidance and British Standard.
- 6.4.4 Based on the proposed level of additional noise mitigation, it is predicted that plant noise levels at on-site noise sensitive receptors will be equal to background noise levels. plant noise levels at the nearest noise sensitive receptors off-site (at Wood Farm Close and Brockley Hill House) will be at least 10 dB below background noise levels and will not increase the background noise levels. A small proportion of attenuation is required, though, which could comprise acoustic attenuators or screens to the plant. Officers consider that full details of those could be dealt with by a planning condition.
- 6.4.5 On this basis, the scheme is considered to comply with planning policy

## 6.5 **Traffic, Safety and Parking**

6.5.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: T1, T2, T4, T6, T6.4
- Mayor's Transport Strategy: Policy 1
- Harrow Core Strategy CS1 R
- Harrow Development Management Policies Local Plan (2013):DM42 and DM 43

### Car and Cycle Parking

- 6.5.2 The proposed development is car free. The hospital provides multiple car parks around the wider site. The proposals have been referred to the Highways authority who have raised concerns with the lack of additional cycle parking facilities proposed. The applicant has reviewed the comments made in relation to cycle spaces and has outlined that 6 spaces are to be delivered (5 long-stay and 1 short-stay) near the entrance to the proposed building. The proposed cycle parking spaces would be used by staff given the nature of the Hospital's Orthopaedic specialism and the restricted access to the proposed theatres. RNOH staff will have access to the washing and storage facilities in the proposed building.
- 6.5.3 It is further outlined that patients are very highly unlikely to travel to the site by means of active travel given the nature of the hospital. Visitor access is restricted to the wards in which patients are transported back to pre and post operation and visitors can use existing shower and locker facilities within the main RNOH building on the site.
- 6.5.4 Moreover drawing H2204-PL-02.2A Proposed Block Plan shows the shower and change facilities in the proposal. Although the proposed location is situated outside of the red line boundary, it is on land within the Applicant's control. Full details of the cycle provision could be secured by condition, should approval be granted.

- 6.5.5 The proposed access road is intended to be used for infrequent deliveries and service vehicles only and would be controlled by a vehicular barrier and this will help ensure that no informal parking around the building will occur.

#### Construction, Delivery and Servicing

- 6.5.6 A draft Construction management Strategy has been submitted which is considered to be acceptable. However, it is noted the development has already commenced on site so in this case a final version cannot be secured. However, a condition will be attached requiring the applicant to build the remainder the of development in accordance with the approved documents which is considered to be satisfactory on this instance.
- 6.5.7 Refuse collection, delivery and servicing will be accommodated via a new corridor running along the northern edge of the proposed building and a new vehicle access road. Officers consider the proposed arrangement to be acceptable. Final details of a Delivery and Servicing Plan in accordance with TFLs guidance can be secured by condition.
- 6.5.8 The application is accompanied by an existing Travel Plan which is out of date. As such, it is considered that the targets within this should be reviewed and updated as part of this proposal to ensure more sustainable modes of travel to the site can be achieved. The Travel Plan can be secured by section 106 agreement.

## 6.6 **Biodiversity, Landscaping and Trees**

- 6.6.1 The relevant polices are:

- National Planning Policy Framework (2021)
- The London Plan 2021: G5, G6, G7
- Harrow Core Strategy CS1 E
- Harrow Development Management Polices Local Plan (2013): DM1, DM12, DM20, DM21, DM22,  
Other Relevant Guidance:
- Circular 06/05: biodiversity and geological conservation

- 6.6.2 The wider hospital site includes both the Royal Orthopaedic Hospital Borough Grade I Site of Importance for Nature Conservation (SINC) and the outliers of the Stanmore Country Park and Pear Wood Site of Metropolitan Importance. The former is 75+ metres distant but, although the latter is 50 metres away, the woodland which it includes continues right up to the southern edge of the development redline.
- 6.6.3 The application is supported by a report of a Preliminary Ecological Assessment which has been referred to the Council's biodiversity officer who has identified several deficiencies with the information, noting it was conducted more than a year ago in the middle of winter. Whilst some desk study was undertaken, this was very limited. The consultants did not utilise existing biological records nor to examine

publicly available information about the location and extent of locally designated wildlife sites. As such relevant species and habitat data to inform both the development and any appropriate mitigation measures have not been addressed

- 6.6.4 There has also been a lack of consideration of the regular movement or dispersal of animals between more valuable areas on the hospital site and beyond and, including across the development area. As such the assessment process is compromised and the reliance which the Planning Statement places on the report is not entirely warranted.
- 6.6.5 Given the nature of the proposals and what is within the redline and its immediate environs, in this case it is considered more appropriate to secure appropriate mitigation and gain.

### Trees

- 6.6.6 The area covered by the Arboriculture report and method statement does not include all of the red line area
- 6.6.7 Whilst the current proposal envisages the removal of one larch tree and a group of holly, it is noted that there has previously been a loss of more than 10% of the site's tree cover. An updated tree report is currently awaited to reflect minor modifications to the scheme and discrepancies between the biodiversity report and current tree report. Further details will be outlined via the committee addendum. It is considered that all trees lost should be replaced on a like basis and on the full Capital Asset Valuation of Amenity Trees (CAVAT) value of what is to be lost. CAVAT is a widely used methodology for the value of lost trees and would ensure trees of equivalent value would be retained on site. The details of this can be secured by planning condition.

### Biodiversity Net Gain

- 6.6.8 The applicant has commissioned a Biodiversity Net Gain Appraisal. This was based on the habitat mapping of the Preliminary Ecological Assessment (PEA), rather than a more up-to-date assessment, those responsible having examined the site nor the suggested offset area. This also means that the information that has been provided doesn't cover the full red line area. Additionally, the applicant has only submitted the consultant's summary report and not a copy of the Biodiversity Metric 3.1 spreadsheet. This will need to be provided to enable a proper evaluation of the consultants' appraisal together with a clear map identifying where any mitigation/gain is to be delivered, including an evaluation of potential impacts on any offset area. In the absence of any evidenced assessment and the 'assessed' value of existing habitat areas have the highest rather than the lowest. What has been provided so far should be treated as indicative rather than presenting any accurate assessment.
- 6.6.9 In summary, there are a number of deficiencies and inconsistencies in the information supplied. These will need to be addressed. Whereas there are no in principle objections on biodiversity grounds to the proposed development, the approach as proposed is unacceptable and will require modification via condition.

- 6.6.10 Where mitigation of impacts and/or gain are to be provided these should, depending on site circumstances, either be delivered within the redline area or in a strategically useful location that would justify an offsetting approach. In this instance, that would have involved consideration of the whole site and identification of suitable locations.
- 6.6.11 At the time of writing this report, further information on biodiversity net gain and UGF proposals are awaited from the applicant. Further updates to the committee can be made via the committee addendum.
- 6.6.12 It is considered that appropriate biodiversity net gain could be secured by planning conditions. As such, conditions are recommended in relation to replacement tree planting a net gain to ensure a minimum of 20% uplift within the site can be achieved. Subject to securing conditions, the proposal would comply with the above policies.

## 6.7 **Energy and Sustainability**

6.7.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: SI 2, SI 3, SI 4, SI7 SI5, SI 13
- Harrow Core Strategy CS1 T, X
- Harrow Development Management Polices Local Plan (2013): DM 12, DM 14

6.7.2 The application is accompanied by an energy strategy which follows the London Plan energy hierarchy.

6.7.3 The development site will be constructed to comply with Part L 2021 of the Building Regulations. The development will reduce regulated CO2 emissions by incorporating a range of passive design and energy efficiency measures, including improved building fabric standards beyond the requirements of Part L of the Building Regulations and energy efficient mechanical and electrical plants. These measures will enable the proposed development to exceed Target Emission Rates (TER) and Target Primary Energy Rate (TPER) minimum standards through energy efficiency measures alone.

6.7.4 After reduction of the energy demand, the strategy proposes implementation of energy efficient Air Source Heat Pump (ASHP) systems to supply space heating and hot water for the development.

6.7.5 The applicants have noted they are not able to comply to Be Seen requirements (35% improvement on site) due to the high cooling requirements for Operating Theatres and the specific fan power on the Air Handling Plant due to the specialist ventilation requirements for the building. PV panels onto the roof (in areas that will not be shaded) to go some way to compliance with Be Seen but do not have sufficient space to comply to the 35% improvement.



- 6.7.6 However, the development can achieve the zero-carbon target through a carbon-offset payment which offsets the shortfall in regulated CO<sub>2</sub>-emissions reduction. The total CO<sub>2</sub> emissions to offset have been calculated as circa 598.8 t.CO<sub>2</sub>/yr. Based on a carbon price of £95 t.CO<sub>2</sub>/yr over a 30-year period, this is equivalent to a cash-in-lieu contribution of circa £56,516. The carbon off set contribution can be secured by section 106 agreement.
- 6.7.7 A Circular Economy Statement, Whole Life Carbon and Sustainability Statement confirm that the approach to sustainability is compatible with policies of the London Plan, being within acceptable policy thresholds, the scheme being designed and capable of delivery in a sustainable way. A condition can be secured to secure a post construction assessment.
- 6.7.8 In accordance with London Plan Policy SI2 the Applicant is required to calculate and reduce whole life-cycle carbon ('WLC') emissions to fully capture the development's carbon footprint.
- 6.7.9 The GLA has noted that the applicant has not submitted a fully completed GLA WLC template spreadsheet and without a completed template a review cannot be undertaken. The additional information will be referred to the Mayor under the stage 2 referral process. A condition can be secured to secure a post construction assessment.
- 6.7.10 Taking account of the specific considerations of this building in relation to energy needs and subject to securing and the above conditions and obligations, the scheme is considered to be acceptable in relation to the above planning policies.

## 6.8 **Development and Flood Risk and Air Quality**

- 6.8.1 The relevant policies are:
- National Planning Policy Framework (2021)
  - The London Plan 2021: SI 12 and SI13
  - Harrow Core Strategy 2012: CS1U
  - Harrow Development Management Polices Local Plan (2013):DM9, DM 10
- 6.8.2 The Site falls within Flood Zone 1 land which has a low probability flooding, therefore, there is no requirement to produce a standalone Flood Risk Assessment with this Application.
- 6.8.3 The SuDS proposed, comprises:
- In principle storm water will be held on site and released to the public surface water sewer at a discharge rate of 2 l/s this is the minimum rate to prevent blockages;
  - A catchpit manhole will intercept solids and discharge to the geocell attenuation tank;

- The attenuation tanks drain to a manhole with a vortex flow restrictor, details of which are attached to the hydraulic calculations.
- The flow restrictor manhole discharges to a surface water tail limited to 5 l/s provided by the NHS Trust.

6.8.4 The application has been reviewed by the Council's drainage engineers who raised no objection, subject to conditions. It is therefore considered the proposed development is compliant with above outlined polices.

### Air Quality

6.8.5 An Air Quality Assessment has been prepared by Temple and submitted with this Application. The Assessment concludes that:

- The assessment of air quality in relation to roads during the construction and operational stages has determined that there will be a negligible impact on air quality as a result of road traffic, the proposed emergency generator and Non-road Mobile Machinery and therefore the air quality effects will not be significant;
- The dust risk assessment has identified that construction activities pose a low risk. However, with the implementation of the mitigation measures detailed the accompanying Air Quality Assessment, the activities are not anticipated to result in significant effects on local receptors;
- The baseline assessment shows that future Site users would not be exposed to poor ambient air quality; and
- The development has been assessed as air quality neutral.

6.8.6 It is noted that the GLA have outlined that on-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for Opportunity Areas (Policy SI1 para. D). This can be secured via planning condition.

6.8.7 The GLA have also noted that measures to control emissions during the construction phase relevant to a low risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. However, as the development is already commenced and a substantial part of the structure complete, compliance with such a condition can no longer be met.

## 6.9 **Accessibility and Fire Safety**

6.9.1 *The relevant policies are:*

- The London Plan 2021: D3, D5, D12
- Harrow Development Management Polices Local Plan (2013):DM2

## Accessibility

- 6.9.2 The applicant has outlined that the development of the proposals has followed extensive engagement, over several months, with the clinical users and support staff, as well as development and estates teams and the RNOH Inclusivity Team. Given the restrictive nature of the facilities, for surgical theatres, access is strictly controlled and operationally managed. There is therefore no unrestricted public access to the unit.
- 6.9.3 The facilities have been designed to BS8300, Design of buildings and their approaches to meet the needs of disabled people – Code of Practice. March 2009. Provision is made for disabled toilet facilities within the facility with accessibility for all.
- 6.9.4 It is considered that the applicant has demonstrated that the building will be suitably inclusive and accessible to all and is acceptable in this regard.

## Fire Safety

- 6.9.5 In line with policy D12 of The London Plan (2021), the applicant has provided a fire strategy, prepared by a suitable qualified third party assessor.
- 6.9.6 The GLA noted that to demonstrate compliance with policy D12 of the London Plan, the statement needs to provide details of a suitably positioned unobstructed outside space appropriate for use as an evacuation assembly point.
- 6.9.7 With reference to drawing reference H2204-PL-02.2A Proposed Block Plan, the fire assembly point has been marked and is located to the north-west of the application site.
- 6.9.8 As such, it is considered the policy requirement of Policy D12 of the London Plan has been satisfied.
- 6.9.9 A planning condition is recommended to secure the details of the fire strategy.

## **7.0 CONCLUSION AND REASONS FOR APPROVAL**

- 7.1 The proposed development would result in limited visual harm to the Green Belt and a modest amount of spatial harm. As such the proposal is an inappropriate development in the Green Belt. Nevertheless, the the applicant has provided a case of Very Special Circumstances setting out the pressing need to reduce the waiting time for surgery following the COVID 19 Pandemic. Officers accept that there is an acute need for this facility, which is required to provide additional medical capacity.
- 7.2 There will be some impacts on biodiversity value of the site but this can be off set through securing additional net gain on the site and elsewhere around the RNOH site.

- 7.3 The proposal would result in a sustainable and energy efficient building which would have an acceptable impact on the character and appearance of the surrounding area.
- 7.4 In conclusion, given the limited harm that would be caused to the Green Belt and balancing this against the very special circumstances of providing an additional medical facility to meet demand, officers conclude that very special circumstances decisively outweigh any harm to Green Belt.

## **APPENDIX 1: Conditions and informatives**

### 1. Approved Plans and Documents

Save where varied by other planning conditions comprising this permission and unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved drawings and documents.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies and policy DM 1 of the Local Plan (2013) and for the avoidance of doubt and in the interest of proper planning.

### 2. Surface Water Drainage

Prior to first occupation of the development hereby approved, details of works for the disposal of surface water, including surface water attenuation and storage, shall be submitted to, and agreed in writing by, the local planning authority. The submitted details shall include measures to prevent water pollution and details of SuDS and their management and maintenance.

The development shall be carried out in accordance with the details so agreed before the development is occupied and shall be retained as such thereafter.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited, in accordance with London Policies SI12 & SI13 of the London Plan (2021) and Policy DM 10 of the Local Plan (2013).

### 3. Foul Water Drainage

Prior to first occupation of the development hereby approved, a foul water drainage strategy, shall be submitted to and agreed in writing by the local planning authority. The development shall not be occupied until the agreed drainage strategy has been implemented.

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, in accordance with Policy 5.14 of the London Plan (2016) and Harrow Core Strategy Policy CS1, and to ensure that the development would be resistant and resilient to foul water flooding in accordance with Policy DM10 of the Local Plan (2013). To ensure that measures are agreed and put in place to dispose of foul water arising from the development, this condition is a PRE-COMMENCEMENT condition.

#### 4. Hard and Soft Landscaping

Prior to the first occupation of the building a scheme for the hard and soft landscaping shall be submitted to, and agreed in writing by, the local planning authority. The hard and soft landscape details shall include the following:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating and so on. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Include details of the tree pit, soil cells and tree fixing, details of the semi natural pond area new planting. The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer.
- b) Details of replacement tree planting which shall be based on CAVAT valuation
- c) Green roofs for the ancillary buildings, hard and soft landscape details including planting medium, buildup layers and planting plans and written specification of the planting and planting plans. Details of the maintenance and proposed ongoing plant replacement, for any plant failures, during the lifetime of the built development.
- d) Details of all furniture, boundary treatment, specification for supports and fixings for plants, landscape structures and any climbing plant frames, including proposed material and source / manufacturer, watering or irrigation system for planting and detailed drawings of such; for all communal amenity areas, raised beds, furniture and bespoke furniture.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity in accordance with Local Plan Policies CS.1B, DM1, DM7 and Policies G5, G6, G7 of The London Plan (2021) and to ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity in accordance with Local Plan Policy DM 21.

5. External Lighting

The building hereby approved shall not be occupied until details of the lighting of all external areas (including buildings) relating to the development have been submitted to, and agreed in writing by, the local planning authority

The development shall be carried out in accordance with the details so agreed prior to the first occupation of the building and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of design quality in accordance with Local Plan Policy DM1 and to ensure that the development does not unduly impact on the biodiversity potential of the site in accordance with Local Plan Policy DM 20.

6. Secured by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted and approved in writing by the Local Planning Authority. The development shall be retained in accordance with the approved details.

REASON : In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime, in accordance with Policy D 11 of the London Plan (2021) and Policy DM2 of the Local Plan (2013), and Section 17 of the Crime & Disorder Act 1998.

7. Soft Landscaping Management and Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the hard and soft landscaping relating to development has been submitted and approved in writing by the Local Planning Authority. The details shall include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years, including the ground level hard and soft landscape, green roofs and any biodiverse roofs and landscape structures for plant growth and a programme of maintenance including a calendar of routine physical tasks for all landscape areas / plant replacement for the life time of the development for landscape structures.

The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity, in accordance with Policies DM21 and DM22, of the Local Plan (2013), and to ensure a high standard of design, layout and

amenity in accordance with Policy DM1 of the Local Plan.

8. Delivery and Servicing Plan

The building hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to, and agreed in writing by, the local planning authority. The Plan will include setting out permitted delivery times. The development shall adhere to the plan so agreed.

REASON: To ensure that the transport network impact of deliveries associated with the phase one development is managed in accordance with Local Plan Policy DM1 and Policy T4 of the London Plan (2021).

9. Cycle Parking

The development hereby permitted shall not be occupied until details of the cycle parking spaces on the site have been submitted to and approved in writing by The Local Planning Authority. The cycle parking shall be implemented on site in accordance with the approved details prior to the first occupation of the building and shall be retained for the lifetime of the development.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy T5 of The London Plan 2021 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

10. Energy and Sustainability

The development shall be undertaken in accordance with the approved Sustainability Statement and Energy Strategy. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Strategy which thereafter shall be submitted to the Local Planning Authority for written approval.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2021 and policy SI 2 and SI 3 of the London Plan (2021).

11. Biodiversity Net Gain

Prior to the occupation of the building hereby approved, a plan detailing the implementation of biodiversity mitigation and net gain measures, demonstrating a minimum level of 20% gain for biodiversity, shall be submitted to the Local Planning Authority and approved in writing. The plan should include details of a programme for its implementation. The development shall be undertaken in accordance with the approved plan.

REASON: For the protection of biodiversity (in accordance with local plan Policy



DM 20) and for the enhancement of biodiversity conservation and provision of access to nature (in accordance with local plan Policy DM21) in support of the local Biodiversity Action Plan and in accordance with policy G6 of the London Plan (2021) and the National Planning Policy Framework. This is a pre commencement condition to ensure no harm would be caused to biodiversity during construction.

12. Whole life cycle carbon

Once the as-built design has been completed and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA at: ZeroCarbonPlanning@london.gov.uk. The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan (2021).

13. Circular Economy Statement

Prior to the occupation of the development, a postconstruction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The post-construction monitoring report shall be submitted to the GLA, currently via email at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with policy D3 and SI7 of The London Plan (2021)

14. Plant Screens

Prior to the first occupation of the development, details of plant screen for the mechanical plant on the roof of the building shall be submitted and approved in writing by the Local Planning Authority. The details shall be implemented as agreed prior to the occupation of the building and shall thereafter be retained.

Reason: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policy D3 of the London Plan (2021) and Policy DM 1 of the Local Plan (2013).

## **COMPLIANCE**

### 15. Noise – Mechanical Plant

The rating level of noise emitted from any plant, machinery and equipment on the site, including within the approved electrical substation, shall be lower than the existing background level by at least 10 dB(A). Noise levels shall be determined at one metre from the boundary of the nearest noise sensitive premises. The measurements and assessments shall be made in accordance with BS 4142:2014. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.

Before any plant is used, measurements of the noise from the plant must be taken and a report / impact assessment demonstrating that the plant (as installed) meets the design requirements, shall be submitted to be approved in writing by the Local Planning Authority.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Local Plan Policy DM1 and Policy D14 of the London Plan (2021).

### 16. Implementation of hard and soft Landscaping

All hard landscaping shall be carried out prior to the first occupation of the building or in accordance with a programme first agreed in writing by the local planning authority. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the New Civic office building being brought in to use or the completion of the development, whichever is the sooner.

Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity, in accordance with Policies DM22 and DM 21 of the Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Local Plan.

17. Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy DM 15 of the Harrow Development Management Policies Local Plan (2013).

18. Fire Strategy

The development hereby approved shall adhere to the approved fire strategy for the lifetime of the development

REASON: In the interest of Fire Safety and to ensure the safety of all building users in accordance with policy D 12 of the London Plan (2021).

## **INFORMATIVES:**

### 1. Policies

The following policies are relevant to this decision:

#### **National Planning Policy:**

National Planning Policy Framework (2021)

#### **The London Plan (2021)**

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive Design

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire Safety

Policy D13 Agent of Change

Policy D14 Noise

Policy S1 Developing London's social infrastructure

Policy S2 Health and Social Care Facilities

Policy HC1 Heritage Conservation and Growth

Policy G2 London's Green Belt

Policy G5 Urban Greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and Woodlands

Policy SI1 Improving air quality

Policy SI 2 Minimising Greenhouse Gas Emissions

Policy SI 3 Energy Infrastructure

Policy SI 4 Managing Heat Risk

Policy SI 7 Reducing Waste and Supporting the Circular Economy

Policy SI 8 Waste Capacity and net waste self sufficiency

Policy SI12 Flood risk management

Policy SI13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy DF1 Planning Obligations

#### **Harrow Core Strategy (2012)**

CS1: Overarching Principles

#### **Harrow Development Management Policies Local Plan (2013):**

Policy DM 1 Achieving a High Standard of Development

Policy DM 6 Area of Special Character

Policy DM 9 Managing Flood Risk

Policy DM 10 On Site Water Management and Surface Water Attenuation

Policy DM 12 Sustainable Design and Layout

Policy DM 13 Decentralised Energy Systems

Policy DM 14 Renewable Energy Technology  
Policy DM 16 Maintaining the openness of the Green Belt and Metropolitan Open Land  
Policy DM 20 Protection of Biodiversity and Access to Nature  
Policy DM 21 Enhancement of Biodiversity and Access to Nature  
Policy DM 22 Trees and Landscaping  
Policy DM 42 Parking Standards  
Policy DM 43 Transport Assessments and Travel Plans  
Policy DM44 Servicing  
Policy DM45 Waste Management  
Policy DM 46 New Community Sport and Educational Facilities  
Policy 50 Planning Obligations

Site Allocations (2013)

2. INFORMATIVE: CONSIDERATE CONTRACTOR CODE OF PRACTICE

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising any adverse effects arising from building operations, and in particular the limitations on hours of working.

3. INFORMATIVE: IMPORTANT: COMPLIANCE WITH PLANNING CONDITIONS

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.

Beginning development in breach of a planning condition will invalidate your planning permission. If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.



4. Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This decision has been reached in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

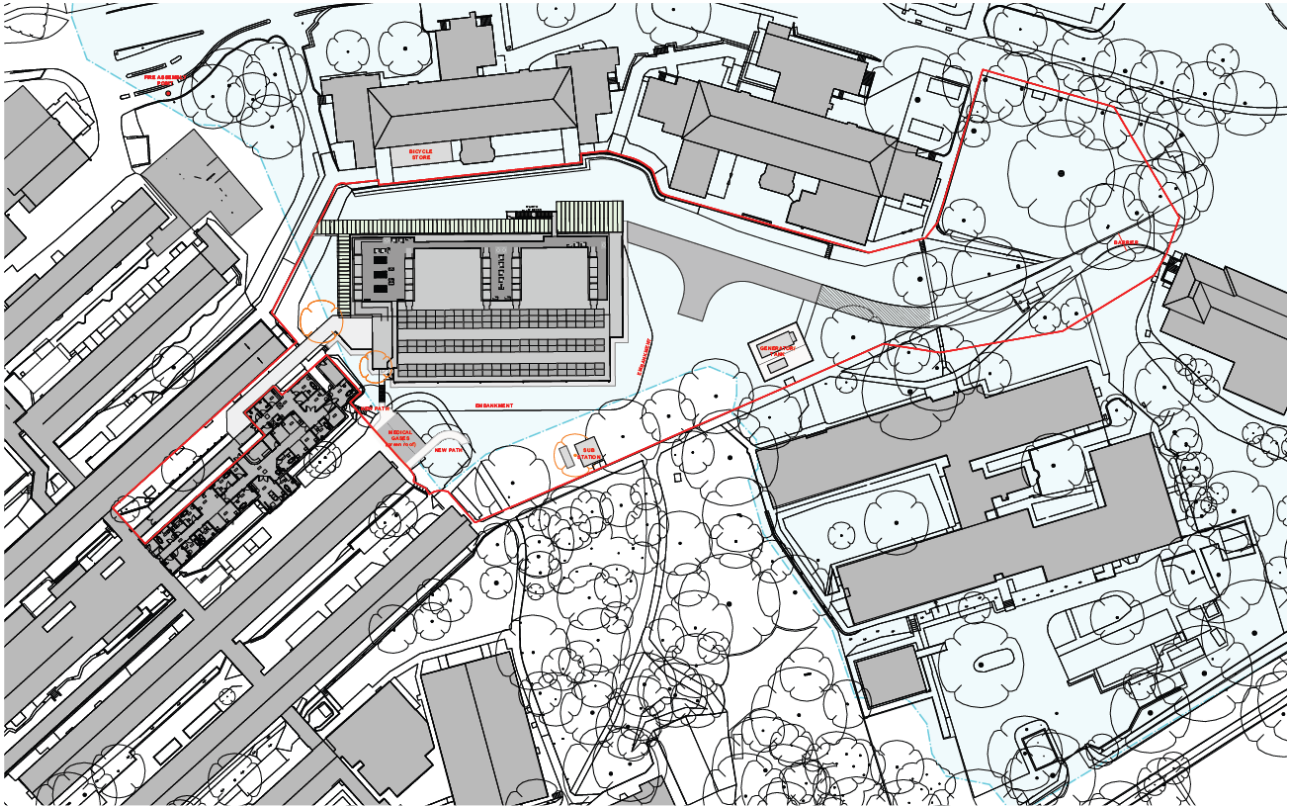
**Plan List:**

Arboricultural Method Statement by Arbtech, dated 12 December 2022; Circular Economy Statement Draft, dated 16/12/2022; Construction Management Strategy, dated November 2022; Supporting Letter Temple, dated 16<sup>th</sup> December 2022; Design and Access Statement, dated December 2022; Preliminary Ecological Appraisal, dated 17/12/2021; Energy Strategy, dated 15<sup>th</sup> December 2022; Fire Statement; Ground Investigation Report by Compass Geotechnical Ltd Ref: 222993B, dated July 2022; Planning Statement, dated December 2022; Preliminary Plant Noise Impact Assessment, dated December 2022; Site Waste Management Plan, dated 22<sup>nd</sup> November 2022; Sustainable Drainage Strategy Ref 22040-AMA-01-XX-CA-D-138001-S2-P02 Rev P02; Sustainability Statement, dated 14<sup>th</sup> December 2022; Transport Statement Doc No. D001, dated December 2022, Version 1.0; Tree Survey by Arbtech, dated 21<sup>st</sup> December 2021; Arboricultural Impact Assessment, Issued November 2012; Biodiversity Net Gain Assessment, dated 12/12/2022 Version 1.0; Air Quality Assessment, dated December 2022;

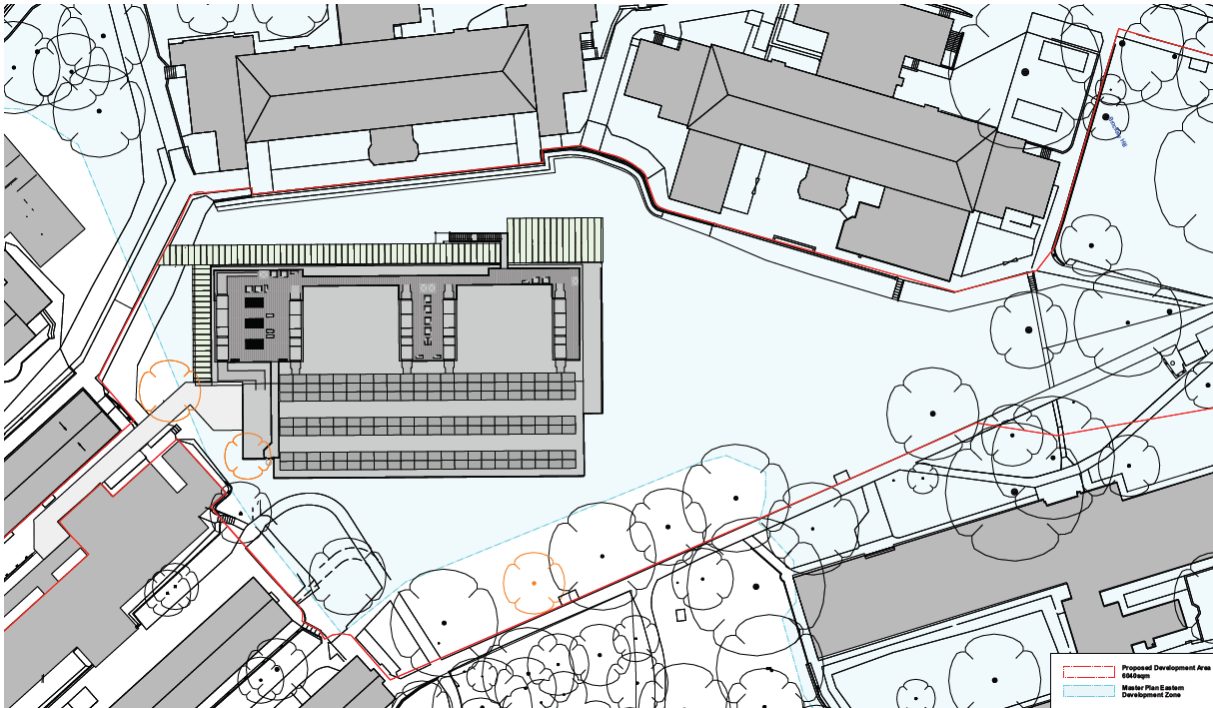
**CHECKED**

 <p>Orla Murphy Head of Development Management</p> <p>6<sup>th</sup> July 2023</p>	 <p>Viv Evans Chief Planning Officer</p> <p>6<sup>th</sup> July 2023</p>
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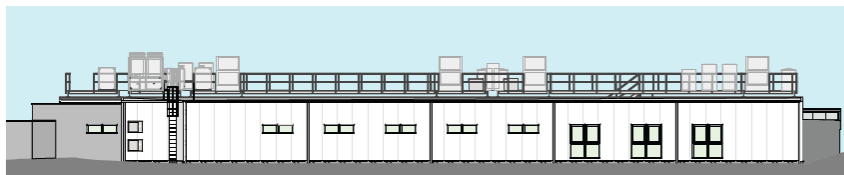
## **APPENDIX 2: SITE PLAN**



# APPENDIX 3: PLANS AND ELEVATIONS

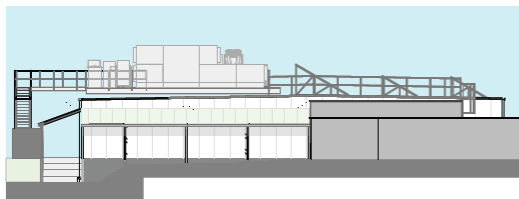


Proposed Roof Plan

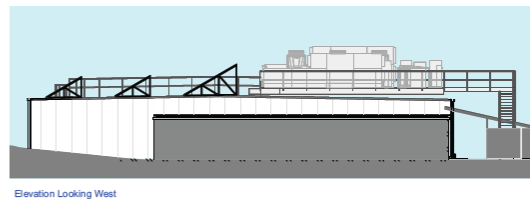


Elevation Looking North

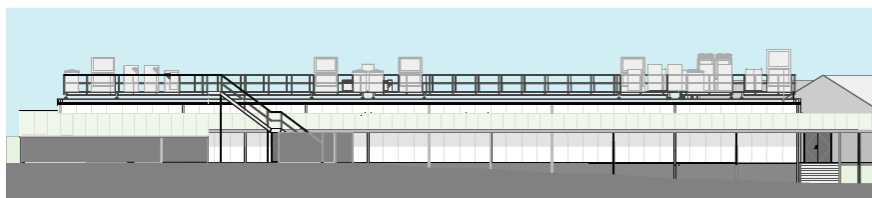
MATERIALS	
CLADDING	White Strassburg RAL 9010 Alaska Grey Kempton RAL 7000
SKY	885 Grey Facing Brickwork
JOINERY	Flaxen coated Essex Grey RAL 7012
RAIN WATER GOODS	Aluminium Powder coated White RAL 9010
STAIRS/HANDRAILS/CANOPY FRAMES	Galvalume Steel
ROOF	Asph/Flt Membrane 885 Grey RAL 7005



Elevation Looking East



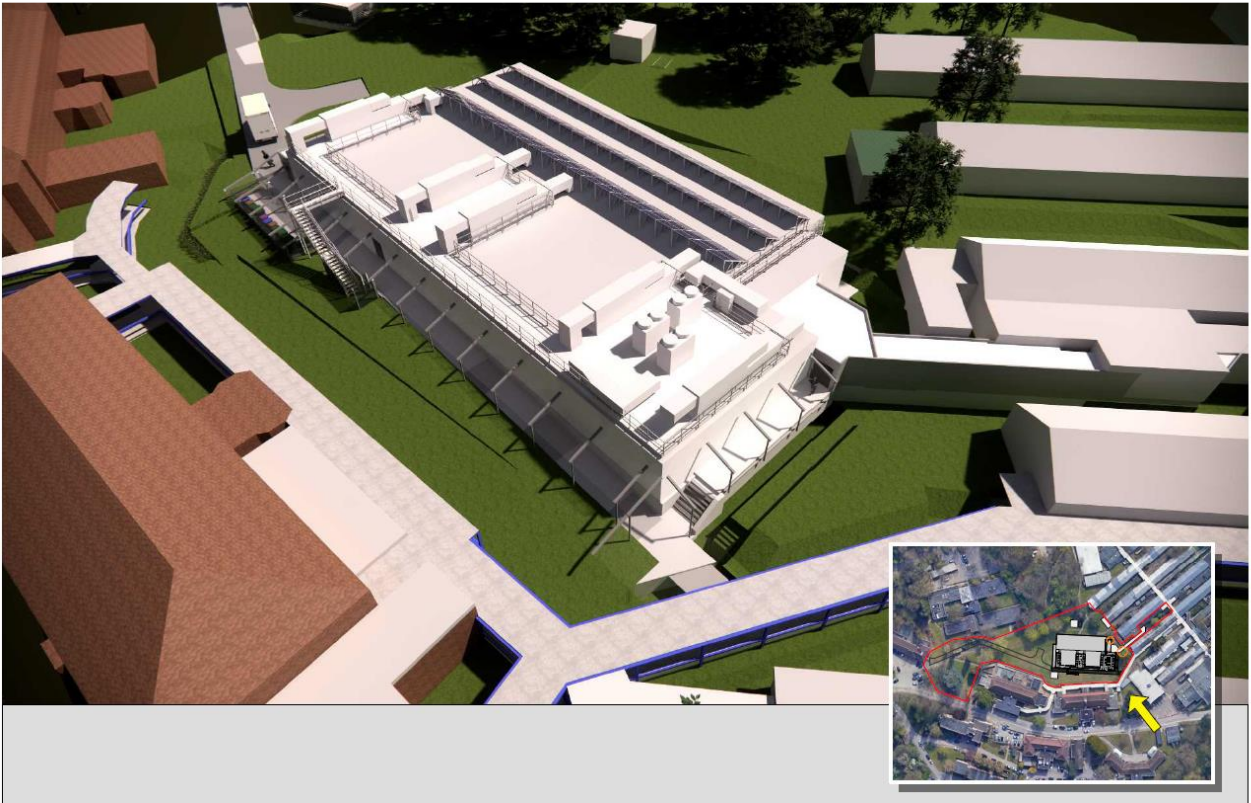
Elevation Looking West



Elevation Looking South

## ProProposed Elevations





Proposed view form west



Proposed view from north



Proposed view to south

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