

SECTION 1 – MAJOR APPLICATIONS

ITEM NO. 1/01

ADDRESS: THE ROYAL NATIONAL ORTHOPAEDIC HOSPITAL, BROCKLEY HILL, STANMORE, HA7 4LP

REFERENCE: P/3191/12

DESCRIPTION: **Hybrid planning application** for the comprehensive, phased, redevelopment of the Royal National Orthopaedic Hospital. The application is accompanied by an Environmental Statement. The development comprises two elements:

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);
- 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.

Detailed Element (Full):

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.

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 works.

WARD: Canons

APPLICANT: The Royal National Orthopaedic Hospital, NHS Trust

AGENT: Drivers Jonas Deloitte

CASE OFFICER: Olive Slattery

EXPIRY DATE: 02/04/2012

RECOMMENDATION A

GRANT planning permission subject to:

- Conditions set out at the end of this report;
- Referral to the GLA under Stage 2 of The Town and Country Planning (Mayor of London) Order 2008;
- Referral to the National Planning Casework Unit (DCLG) under The Town and Country Planning (Consultation) (England) Direction 2009; and
- The completion of a Section 106 agreement with the heads of terms set out below (subject to further negotiation and agreement).

Authority to be given to the Divisional Director of Planning in consultation with the Director of Legal and Governance Services for the sealing of the Section 106 agreement and to agree any minor amendments to the conditions or the legal agreement.

PROPOSED HEADS OF TERMS

Open Space, sport and recreation

The submission of a long term management strategy for the publicly accessible open spaces, including funding arrangements, to be agreed in writing. Implementation of the strategy within 1 year from the first occupation of any of the new hospital buildings or residential development (whoever is the sooner).

Compliance with an environmental management Plan to be introduced across the site on a phased basis starting 1 year from the commencement of the development. The Environmental Management Plan to be agreed in writing with the Council prior to the implementation of the development. This will mitigate the impact of the demolition of the buildings on the land and the construction of the development on the surrounding environment. To include trees, biodiversity and green belt management

Public access strategy – the introduction and operation of a management plan to permit public access at reasonable times to the NAZ area of the site, and to permit its use in a manner consistent with its contribution as part of Harrow's Green Grid.

An off site contribution to sports and leisure facilities

Education

Off site contribution to Education provision in the Borough commensurate with the child yield of the development.

Transport and Travel

On and off site Traffic management and Highway works as follows:

- i) Parking Controls - A contribution [£75,000] towards the investigation and

implementation of any combination of parking controls (including a Controlled Parking Zone) in the locality surrounding the site following completion of the PFI hospital at phase 2.

ii) Strategic Green Travel Plan - A financial 'performance bond' [£30,000] to be applied to the CDZ (phase 2 onwards), WDZ (phase 4 onwards) and EDZ (phase 8 onwards) to incentivise modal shift targets toward sustainable transport once SMART targets are established at relevant future reserved matters application stages.

iii) Bus Service/Infrastructure Contributions -

A contribution toward providing a bus service either through or alongside the site for 3 years post mid-2015).

- A contribution (£22,000) toward two bus stop 'countdown' facilities in Brockley Hill.
- A contribution (£20,000) toward provision of 'real time' information facilities within the site.
- A contribution (£20,000) toward the upgrade of the Brockley Hill bus stops.

iv) Traffic Calming- A contribution toward the implementation of traffic calming measures in Wood Lane.

All remaining highway enhancement works would be entered into and executed under s278 of the Highways Act 1980 with all related implementation costs absorbed by the developer at source negating any direct up front financial contribution.

Security of access for TfL/or appropriate alternative bus operator to enter and leave the site via a designated site access road without charge, and to drop off and pick up passengers from within the site at specific, designated points, pursuant to the operation of a public transport bus service.

Staff/Key worker Housing

All staff/key worker housing to be provided as intermediate housing and to be retained for that purpose

Employment and training

Engagement with the Councils Xcite programme (or other related employment programme operated for the purpose of promoting/enabling employment at the site), including an annual contribution for a period not greater than 5 years, starting with the commencement of the development hereby approved.

Enabling Development

To ensure that the development and disposal of the residential developments is tied to the delivery of the Hospital, and that any surplus receipts generated by the disposal of land for residential development, is utilised on the development of hospital facilities supporting RNOH at Stanmore, or on related infrastructure or environmental mitigations.

Monitoring and Compliance

Payment of the Councils monitoring costs

EXECUTIVE SUMMARY

The Royal National Orthopaedic Hospital Trust in Stanmore enjoys a world-wide reputation for orthopaedics. Its 41.5Ha site in the Metropolitan Green Belt has nevertheless grown sporadically and without an overarching masterplan. Substandard

and decaying buildings are dispersed throughout the site, leading to significant operational costs and inefficiencies, and reducing the capacity of the Trust to continue to provide world class clinical care.

This hybrid planning application, comprising an outline and a detailed element to facilitate early implementation, is for the comprehensive, phased, redevelopment of the Royal National Orthopaedic Hospital and its associated grounds. The application follows an earlier scheme approved by the Council in 2007, and renewed in 2010. Having exhausted all other options to secure funding for the longstanding aspirations on this site, the application proposes a greater quantum of residential “enabling” development than the earlier scheme (up to 356 residential units – from 191), to complement PFI funding and proposed borrowing by the Trust. The overall masterplan nevertheless describes development programme in excess of £400m, which will lead to the transformation of this designated Previously Developed Site.

The sites location, varied built form and character, elevated position, rich and varied topography and ecology, coupled with its relatively remote location for public transport and major roads has nevertheless caused some unease amongst a small number of the 1300 homes consulted on the proposals. Through a managed pre-application process, the masterplan accompanying the application has evolved from the earlier planning permission to more fully embrace the opportunity for the site to contribute towards London, and Harrows’ evolving green grid. The transport assessment and the access strategy reflect a deliberate trade-off between the efficient operation of the road network near to the site, and the mitigation of the potential adverse ecological impact of more widespread highway works. The layout and configuration of the development zones on the site, whilst likely to lead to dramatic changes to localised views within the site itself, seeks to promote the openness and enjoyment of the extensive landscaped areas in the pursuit of Green Belt and development plan policy objectives.

The planning application is accompanied by a comprehensive suite of documents, including an environmental statement. During the processing of the application, there have been 2 rounds of consultation (once upon receipt and once following the submission of additional environmental information). Over 1300 near neighbours have been notified of the proposals, alongside a range of local and borough wide interest groups, and statutory consultees.

Based upon the consideration of the application and the representations received through consultation, officers are satisfied that the principle of a mixed use development encompassing an element of enabling residential use represents the only way of achieving the replacement and upgrade of the hospital facilities proposed. Subject to validation of the viability report prepared to accompany the application, the Mayor of London supports this conclusion. Notwithstanding a different approach to the prevailing green belt policy, both the GLA and Council officers believe that the application is able to demonstrate very special circumstances which would justify the residential component of the development. Subject to specific conditions and the obligations within the proposed S106, the report concludes that the environmental and ecological impacts of the development are capable of being satisfactorily mitigated. The layout of the site, the design parameters and associated amenities provide to residents, employees, visitors and patients are also, subject to the controls proposed, considered to meet the requirements of local and regional planning policy. Taken as a whole, the proposals are considered to amount to “sustainable” development as defined by the National Planning Policy Framework. In line with the NPPF presumption, officers are accordingly able to

recommend approval of the application.

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 21st July 2013 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 provide appropriate provision for infrastructure that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social and physical infrastructural improvements arising directly from the development, contrary to the NPPF (2012), policies 3.8, 3.18, 3.19, 4.12, 6.3, 7.16, 7.18, 7.19 and 7.21 of The London Plan (2011), Core Strategy (2012) policies CS1 and CS7, and saved policies T6 and C2 of the Harrow Unitary Development Plan (2004).

INFORMATION

This application is reported to the Committee as the number of residential units and floorspace proposed falls outside of the thresholds (six units and 400 sq m respectively) set by category 1(d) of the Council's Scheme of Delegation for the determination of new development.

Statutory Return Type: Largescale Major Development

Council Interest: None

GLA Community Infrastructure Levy (CIL) Contribution (provisional): £1,939,280

Site Description

Borough Level Policy Context

- § 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.
- § The site is of strategic planning importance. It is one of four strategic developed sites in the Green Belt, as defined by the draft Site Allocations Development Plan Document (DPD) and the Draft Development Management Policies Development Plan Document.
- § The Harrow Core Strategy (2012) recognises the national significance of the RNOH as a leading medical institution and supports proposals to secure the future of the RNOH, where there is no conflict with Green Belt policy and the special character of Harrow Weald Ridge would be preserved.
- § The Harrow Core Strategy (2012) anticipates that the site will contribute towards the Borough's housing allocation.

Description of Application Site

- The RNOH is located within the Harrow Weald Ridge Area of Special Character. There are significant changes in levels across the site. The site lies between 120 and 148.1 m above Ordnance Datum ('AOD'). The landform 'curves' around the eastern and western site boundaries at approximately 125 – 135 AOD and falls to approximately 120 m within the central parts, forming a 'bowl' within the centre of the site.
- The northern-most part of the site is predominantly undeveloped land. This part of the site is generally gently sloping, except for the former landfill site, a raised plateau landform with steep slopes on all sides. This open space comprises open grassland,

scrub, orchard and woodland.

- The southern, eastern and western parts of the site are in operational use by The Royal National Orthopaedic Hospital, NHS Trust (the 'Trust').
- This land is occupied by a range of clinical and administrative buildings and also buildings which contain staff accommodation. There is also a variety of associated plant and machinery on the site, as well as car parking.
- The majority of buildings on the application site are in a deteriorating condition with many of them derelict.
- The western part of the site contains both clinical buildings and residential buildings (staff accommodation). This part of the site is visually separated from the remainder of the site by trees. The buildings have a range of storey heights, the maximum being three storeys.
- The main clinical functions of the hospital are located within the southern and eastern parts of the site. The buildings here are generally one and two storey buildings, although there are some three storey buildings.
- The buildings containing hospital wards and theatres are centrally located within the southern part of the site. These buildings were built in the 1930's and comprise interconnected classic Nissen huts.
- The Aspire National Training Centre and the Mike Heaffy buildings are located within this part of the site. These are the most recently built structures on the application site.
- Eastgate House is a substantial locally listed building which is located at the south-eastern corner of the site.
- There are no formal parking controls or parking charges in place on the site. Car parking is distributed in a haphazard fashion across the site.
- There are five vehicular access points to the site; one access point is located off Brockley Hill to the east, three access points are located off Wood Lane to the south and one access point is located off Warren Lane to the south-west.
- The Brockley Hill access point is the main access to the site.
- The western-most access point from Wood Lane serves the Aspire National Training Centre and Rehabilitation Centre.
- The site is subject to a Tree Preservation Order which includes 326 individual trees and 33 groups of trees
- The RNOH site is subject to two non-statutory ecological designations and one proposed non-statutory ecological designation:
 - Areas within the north and west of the site form part of the RNOH Grounds Site of Borough Grade 1 Importance for Nature Conservation (SBINC);
 - The southern edge of the RNOH site forms part of Pear Wood and Stanmore Country Park Site of Metropolitan Importance for Nature Conservation (SMINC)
 - An area of the site directly to the north forms part of the Watling Chase Community Forest planting site and environs a proposed Site of Local Importance for Nature Conservation (pSLINC)
- An Area of Archaeological Priority lies immediately south of the site.
- There are two Scheduled Ancient Monuments on the site.
- The Locally Listed Buildings within the site are Eastgate House (original hospital building) and its associated roadside walls
- Little Common Conservation Area lies immediately to the south-west of the site and slightly extends into the site. The conservation area was created on the basis of its particularly mix of high quality, period properties, a high proportion of which is statutorily and locally listed and the trees and open spaces provided by Stanmore Common surround and interact with the attractive groups of buildings in Little Common, imparting much of the special landscape and qualities of the conservation

area.

Description of Immediate Locality

- The site is bounded by Brockley Hill (the A5) to the east. This London Distributor Road is the borough boundary with the London Borough of Barnet. Open countryside and a small number of residential units are located to the east of Brockley Hill (within the London Borough of Barnet).
- There is a pocket of land to the west of Brockley Hill (within the London Borough of Harrow) which does not form part of the application site. This site is currently occupied by former hospital buildings, three of which are locally listed.
- Brockley Hill Farm also lies to the west of Brockley Hill (within the London Borough of Harrow) and is located immediately north of the application site.
- Wood Lane is located to the south of the application site and this separates the application site from Pear Wood Nature Reserve and Wood Farm.
- The northern part of the Little Common Conservation Area is located to the south-east of the application site. This part of the Conservation Area is heavily wooded.
- The London Outer Orbital Path ('Loop') is a public footpath which runs along the western part of the site. This separates the application site from Grove Farm, which is located to the west of the site. Beyond this lies the former BAE Systems site, which is now a residential development comprising approximately 198 residential units.
- There is open countryside located to the north-west and north-east of the site and beyond this is the M1 motorway.
- Watling Farm Gypsy and Traveller site is located immediately north of the application site.

Proposal Details

Form of Application

A comprehensive, phased, redevelopment of the site is proposed. This application is a hybrid planning application, and comprises two elements: an outline element and a detailed element.

The **OUTLINE ELEMENT** seeks to reserve all matters:

Use – the types of use or uses proposed for the development and any distinct development zones within the site identified;

Amount – the amount of development proposed for each use, in the form of floorspace, footprint or number of residential units;

Layout – an indicative layout showing the approximate location of buildings, routes and open spaces in the proposed development;

Scale – the upper and lower limit for the heights, widths and lengths of buildings, and

Access – the locations where access points to the development would be situated, along with primary and secondary routes within the development.

As such, details of the layout, scale, access, appearance and landscaping of the development, other than where outlined above and set by the **Parameter Plans**, **Parameter Plan Explanatory Text** and **Design Guidelines**, are not under consideration at this stage and would be considered under future reserved matters applications. The above documents would provide a framework for these subsequent details to be prepared.

Buildings to be Demolished

The proposed development would entail the demolition of the majority of the existing

buildings on the site. However, the following four buildings would be retained; the Aspire National Training Centre; the Mike Heaffey Building, Eastgate House and Orchard Court.

Overall Amount of Development Proposed

The table below sets out the development Gross Internal Floorspace (GIFA) applied for under each use class, which would be the maximum amount that could be provided across the development under the OPA:

Use Class	Total Amount	Types of Use
Hospital Development (C2)	56,871sqm (GIFA)	Hospital use, including rehabilitation unit and parent accommodation
Multi-storey carpark	21,000sqm (GIFA)	Multi-storey carpark
Residential (C3)	40,260sqm (GIFA)	Dwellinghouses and flats, including staff accommodation

The Parameter Plans also provide for approximately 19.2 hectares of public open space within the development.

Development Zones

The submitted Parameter Plans set out three distinct development zones and one amenity zone that comprise the masterplan for the site, and these are also considered within the Parameter Plan Explanatory Text and the Design Guidelines. The details of each zone are set out below.

The Central Development Zone (CDZ)

- 9.4 hectares in area
- Up to 19, 378 sqm in footprint (including the multi-storey carpark)
- Up to 56,871sqm (GIFA) of hospital development (C2 use), including rehabilitation unit and parent accommodation
- A multi-storey carpark would comprise up to 21,000 sqm (GIFA)
- The maximum proposed building height is 148.10 AOD. This would not exceed the existing highest building within this part of the site, i.e. the CDZ.

The Western Development Zone (WDZ)

- 7.4 hectares in area
- Up to 6,682 sqm in footprint
- Up to 15,008sqm (GIFA) of residential development (C3 use)
- The building heights would not exceed the existing highest building within this part of the site, i.e. the WDZ.
- Four zones are proposed:
 - Zones 1 – 3: A maximum of 54 dwellinghouses are proposed. They would not exceed 9 m in height and would be comprised of two-storey dwellinhouses with habitable roofspace
 - Zone 4: A maximum of 38 flats are proposed. The building height would not exceed 10m and would be comprised of 2-3 storey’s.

The Eastern Development Zone (EDZ)

- 5.3 hectares in area
- Up to 8,399 sqm in footprint (including Eastgate House and excluding Orchard Court)
- Up to 25,252sqm (GIFA) of residential development (C3 use) (including Eastgate

House and excluding Orchard Court)

- The building heights would not exceed the existing highest building within this part of the site, i.e. the EDZ.
- Seven zones are proposed:
 - Zones 1 – 3: A maximum of 117 residential units are proposed. 9 existing units within Orchard Court would be retained. The buildings would not exceed 13 m in height and would be comprised of three-storey buildings.
 - Zones 4 – 7: A maximum of 138 residential units are proposed, and this includes the proposed change of use of Eastgate House (zone 7). The proposed buildings within zone 4 and 6 would not exceed 10 m in height and would be comprised of three-storey buildings. The proposed buildings within zone 5 would not exceed 11 m in height and would be comprised of three-storey dwellinghouses.

Northern Amenity Zone (NAZ)

- 19.2 hectares in area.
- There is no proposed built development
- This is comprised of land at the northern part of the site and land between the above development zones

Access and Routes

- The application proposes to utilise four of the existing five access points to the site.
- The Parameter Plans set a number of secondary routes that provide access to the development zones within the scheme.

The **DETAILED ELEMENT** seeks full planning permission for works to enable the first phase of the hospital development. This includes both temporary and permanent works and would be located within the CDZ.

Permanent planning permission is sought for:

- Realignment and alterations to the existing estate 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;
- Alterations to the existing car park serving the Aspire National Training Centre to provide a total of 75 car parking spaces
- Associated lighting, drainage and landscape works.

Temporary (5 years) planning permission is sought for:

- 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 works.

Phasing

The development would come forward on a phased basis, which is expected to take up to 12 years. There would be 10 phases of development:

Initial Stage: The submitted phasing strategy identifies a number of enabling works that are required to be completed prior to commencement of construction of the Phase 2 development.

- The diversion, adaptation and removal of underground services

- Highway improvements (further details in section 4 of the appraisal)
- Implementation of the detailed element of this hybrid application (as set out above)

Phase 1: CDZ

- Expected delivery: 2013 – 2014
- Construction of the Princess Eugenie House and Graham Hill Unit. This would be ancillary to the main hospital and would mainly provide accommodation for relatives of patients who are being treated in hospital.

Phase 2: CDZ

- Expected delivery: 2013 – 2016
- Construction of a 'Private Finance Initiative' (PFI) hospital. This would consist principally of in-patient wards for paediatrics, adults and spinal injury patients, together with associated diagnostics facilities and rehabilitation and physiotherapy services.

Phase 3: EDZ

- Expected delivery: 2013 – 2014
- Construction of two new residential blocks to provide staff accommodation, adjacent to the existing staff accommodation within the retained Orchard Court

Phase 4: WDZ

- Expected: 2013 – 2014
- Sale of the WDZ

Phase 5: CDZ

- Expected delivery: 2013 – 2016
- Construction of a multi-storey carpark.

Phase 6: CDZ

- Expected delivery: 2013 – 2017
- Construction of a Private Patients Unit (PPU). It is the Trust's intention to enter negotiations with an appropriate private healthcare provider for the construction and service delivery of this private patients unit.

Phase 7: CDZ

- Expected delivery: 2014 – 2020
- Construction of an Outpatients Department and Estates Wing
- The Outpatients Department would provide a range of services, including consulting and exam rooms, treatment rooms, general diagnostics and out-patients therapies.
- The Estates Wing would contain estates maintenance functions and a large proportion of the Trust's clinical and non-clinical administration.

Phase 8: EDZ

- Expected: 2014/15 – 2018/20
- Sale of the EDZ

Phase 9: CDZ

- Expected delivery: 2015 – 2025
- Construction of a Theatres Wing. This would contain all of the hospital's theatres, a high dependency unit and an intensive treatment unit. The provision of existing

teaching facilities for the Institute, which is part of University College, London, would also be contained within this wing.

Phase 10: CDZ

- Expected delivery: 2015 – Future
- The use of this building will be driven by the clinical needs at this time.

Revisions to Application Following Original Consultation: Received on 11th February 2013:

Following the initial round of consultations on the planning application, and in response to officer feedback, a number of modifications were made to the application. These changes fall within four broad categories, as follows:

- (i) Those that relate to the description of development
 - Required to address inconsistencies across the application documents
- (ii) Those that relate to the parameter plans;
 - Correction of maximum floorspace figures, footprint figures, building parameters
 - Removal of quantum of car and cycle space
 - Removal of quantum of car and cycle spaces
- (iii) Other minor typographical errors which we have used this opportunity to amend;
 - Textual and typographical inconsistencies have been amended
- (iv) Those that relate to clarifications and provision of further information following receipt of consultation responses.
 - Clarification of playspace provision
 - Omission of previously proposed second Wood Lane access
 - Clarification in relation to proposed bus route

Where relevant, additional information has been provided within the technical reports, the Environmental Statement and Illustrative masterplans

Relevant History

P/1704/05/COU - Outline: Partial redevelopment to provide new hospital and associated facilities, housing (including staff), revised road junction, car parking and open space
Granted - 15- January -2007

P/0963/09 - Demolition of Graham Hill unit and construction of three storey Ronald McDonald House (Sui Generis)
Granted - 04-February-2010

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-June-2010

P/3213/12 - The laying of a services duct and associated excavation works and the approval for tree removal

Background - The Case For Change

RNOH Stanmore enjoys a world class reputation for Orthopaedics. However, the existing RNOH facilities are no longer fit for purpose. Services are currently being delivered in a range of aged hospital buildings. Clinical adjacencies are poor, the internal layout is inflexible and the accommodation does not provide an environment that is conducive to modern standards and methods of care. The facilities fail to adequately support clinical need, patient expectations and care requirements.

The history of deliberation over the future of the Hospital stretches back over 30 years, and has resulted in the preparation and submission of a number of Business Cases and ten independent reviews. Most recently, and as per the above site history, outline planning permission was granted for a redevelopment of the site to provide a new hospital and enabling residential development. This outline planning permission was originally granted in 2007 (reference: P/1704/05/COU), and was renewed in June 2010 (reference: P/0083/10).

The Trust has recently been advised by the Department of Health and the Treasury that approval has been given to the proposed first phase of the hospital's redevelopment, under the PFI process. However, in reviewing the brief for the new hospital, it has become clear that the original development parameters secured under the extant planning permission are now obsolete and do not fit the Trust's recently developed models of care and revised phasing strategies. It was decided that a new outline planning application should be prepared, which would take account of a number of new parameters in defining the scope and nature of the redevelopment.

Pre-Application Discussion

The Royal National Orthopaedic Hospital, NHS Trust entered into a Planning Performance Agreement (PPA) in July 2012 with the Council to formalise the pre-application stage of engagement in respect of the proposals. Comprehensive pre-application discussions have taken place with Council officers, Transport For London (TfL), the Greater London Authority (GLA) and other statutory and non-statutory consultees under the terms of the PPA.

Community and Stakeholder Engagement

The Council's Statement of Community Involvement (2006) states that 'ideally the results of pre-application consultation should be included in the planning application and form part of the planning application process'. A Statement of Community Involvement accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including extensive flyer distribution, press releases, presenting to a number of stakeholders and hosting two separate public exhibitions in April 2012 and July 2012. In addition, the applicant attended the Major Development Panel (MDP) in September 2012.

Applicant Submission Documents

These documents set the development limitations and parameters for future reserved matters applications and reflect the position following amendments made to the application in February 2013, in response to consultee and stakeholder comments.

Site Location Plan
Parameter Plans
Design Guidelines
Parameter Plan Explanatory Text

Supporting Documentation

Indicative Plans
Planning Statement & Application
Design and Access Statement
Flood Risk Assessment
Viability Appraisal
Outline Energy Strategy
Transport Assessment
Strategic Site Wide Travel Plan
Heritage Assessment
Green Belt Position Statement
Landscape Strategy
Arboricultural Report
External Lighting Specification
Framework Ecological Management Plan
Phasing and Implementation Programme
Sustainability Statement (includes BREEAM and Code for Sustainable Homes)
Statement of Community Involvement

With the exception of the Heritage Assessment, the External Lighting Specification, the Framework Ecological Management Plan and the Green Belt Position Statement, addendums have been received from each of the above documents.

Environmental Impact Assessment (EIA)

The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the EIA Regs), whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was issued by the Council on the 26th June, 2012. Following design alterations and subsequent increases in proposed floorspace, a revised Scoping Opinion was issued by the Council on 28th September, 2012. The Scoping Opinion comments on the approach and methodology for assessing the impact of the following environmental topics:

- § Socio-Economic Issues
- § Landscape and Visual Issues
- § Ecology and Nature Conservation
- § Archaeology and Built Heritage
- § Noise and Vibration
- § Air Quality
- § Traffic and Transportation
- § Ground Conditions
- § Water Resources and Flood Risk

An Environmental Statement (ES) has been submitted as a supporting document to the application, which includes environmental information under the above topics. Further information was also submitted in the form of an Environmental Statement Addendum to address the changes made to the scheme during the course of the application. Officers are satisfied that this represents the environmental information for the purposes of

Regulation 3. Officers have had full regard to the content of the Environmental Statement in the preparation of this report.

Consultations

Greater London Authority Stage 1 Response:

Development does not fully comply with the London Plan policies. Whilst the GLA stage 1 report acknowledges that the principle of development is on balance acceptable, the Mayors response raises a number of specific concerns in respect of relevant London Plan policy Areas:

Principle of development: The principle to deliver a bespoke re-provision of a nationally significant and world class hospital facility on an existing hospital site within the Green Belt is acceptable. The proposal to deliver enabling residential development (to directly cross-subsidise the new hospital development), replacement staff affordable accommodation and other needed uses to support the delivery of the new hospital is also accepted; the applicant has provided adequate material and justification for development on the Green Belt and in doing so has demonstrated that there will be no increase of development footprint and that there will be no greater impact on the openness or character of the Green Belt. The applicant has also demonstrated very special circumstances exist. Therefore, in this exceptional case and on balance the principle of development is supported in London Plan policy terms.

Housing: Within the context of the Green Belt justification the delivery of housing on this site is acceptable. The small loss of staff accommodation is also accepted exceptionally in this instance as the applicant has demonstrated through viability work that any additional provision would render the delivery of the important first phase of the hospital unviable. Notwithstanding this, in order to satisfy policy tests of the London Plan, the applicant's viability work which has been submitted will be independently assessed is in line with policies 3.11 and 3.12. Further clarification is sought with respect to the indicative residential mix for the staff accommodation. With regards to residential quality a number of planning conditions will need to be secured before the scheme is referred back at stage two for the scheme to be compliant with London Plan policy 3.5. The residential density is lower than the threshold set out in London Plan policy 3.4 and table 3.3 respectively; however, given the site's Green Belt context, the residential density is accepted.

Children's playspace: Clarification of the child yield figures and associated play space requirement is sought and a play strategy should be submitted so that the scheme complies with London Plan policies 3.6 and is acceptable in this regard.

Urban design: The proposed design is generally supported in line with London Plan policies contained in chapter seven and the applicant has demonstrated that there will be no impact on openness of the Green Belt, however, the applicant is requested to provide clarification of some longer views.

Heritage/archaeology: The development will not result in substantial harm to or total loss of significance of any designated heritage assets; therefore the development proposals are acceptable and in line with London Plan policy 7.8.

Inclusive access: The scheme currently fails to comply fully with London Plan policies 3.8 and 7.2. before the scheme is referred back to the Mayor clarification is needed.

Air quality: The applicant has provided adequate information and the development proposals comply with policy 7.14 of the London Plan.

Trees: Whilst it is acknowledged that the outline masterplan parameters mean it may be difficult to definitively identify all the effected trees at this stage, the applicant will need to provide further clarity on this matter to ensure accordance with London Plan Policy 7.21.

Biodiversity: The applicant has demonstrated that the value of the site in terms of biodiversity and ecology will be maintained and, in the long-term will provide significant enhancements for wildlife, which is in accordance with London Plan Policy 7.19. The Council should ensure that the necessary and appropriate planning conditions/section 106 legal agreement in this regard are secured.

Sustainable development: In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

Transport: TfL accepted the parking levels for the site, which are in line with London Plan policies. The applicant will need to submit a parking management plan, provide 20% electric vehicle charging points, details of blue badge parking, a PERS audit and relevant travel and delivery and servicing plans, all of which will need to be secured by the Council via planning condition and S106 as appropriate. Further information is also required with regards to staff and visitor cycle parking. With regards to bus provision before the scheme is referred back at stage two, the applicant will need to give assurances that both the shuttle bus and UNO 615 services will cease once the 324 extension is established, and TfL would expect this to be secured through the s106 agreement or similar appropriate legal undertaking. A commitment to agreeing the precise details of the key bus infrastructure requirements with TfL should therefore be embedded into the section 106 agreement.

If minded to approve, the application would need to be referred back to the Mayor under Stage 2.

External Consultees

Environment Agency: Conditions recommended in relation to protection of watercourse and ponds, mitigation of Japanese Knotweed, surface water storage and land contamination

English Heritage: No objections. The setting of the Brockley Hill Romano British pottery and settlement Scheduled Ancient Monument will not be adversely affected. The obelisk is already somewhat compromised by the trees in close proximity and it would be helpful if the trees could be managed and thinned, to allow better access and appreciation of it, as the obelisk will be further hemmed in as a result of the proposed new scheme.

English Heritage Archaeology: Conditions recommend requiring the implementation of a programme of archaeological mitigation and standing building recording.

Natural England: Badgers, barn owls and breeding birds¹, water voles, widespread reptiles, freshwater fish, invertebrates, higher and lower plants or white-clawed crayfish are all species protected by domestic legislation and the LPA should use the standing advice to assess the impact on these species. Permission may be granted subject to appropriate conditions including a detailed mitigation and monitoring strategy for bats. The planning authority should consider whether the proposal would be likely to be granted a licence.

Sport England: The applicant has failed to consider the needs of sport specifically, both in terms of built sports provision and open space in the form of pitches. It is Sport England's view that the sporting needs arising as a result of the development should be considered and met as part of the proposed development.

Thames Water/Veolia: Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. A 'Grampian Style' condition is suggested requiring a drainage strategy to be submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage.

No objection to full element of the scheme, subject to a condition relating to surface water drainage.

Design for London: Much is to be determined at reserve matters stage if the Council is minded to approve this outline.

WDZ – Concerns raised in relation to the link to the London Loop, openness at the Warren Lane entrance and the need to replace the Zachery Merton building

CDZ – Concerns in relation to the internal highways around the hospital and the balancing pond, the form of the proposed Princess Eugenie House and the surface level carparking

EDZ – Concerns in relation to pedestrian links and the extent of hardsurfacing for internal access roads

The Ancient Monuments Society – No response received

The Council for British Archaeology – No response received

The Georgian Group – No response received

The Society for the Protection of Ancient Buildings – No response received

The Victorian Society – No response received

The 20th Century Society – No response received

National Casework Unit – No response received

Homes and Communities Agency – No response received

Harrow Primary Care Trust – No response received

Health & Safety Executive – No response received

NHS Harrow – No response received

London Wildlife Trust – No response received

London Green Belt Council – No response received

Neighbouring Boroughs

Three Rivers: No comments to make due to the distance of the site from the boundary with Three Rivers.

Hertsmere: No response received.

Hillingdon: No response received.

Ealing: No objection raised.

Brent: Objection to the Transport Assessment - this is primarily related to the residential component. Satisfied with the trip generation figure, but concerns are raised in relation to how the mode has been split.

Barnet: Concerns raised, particularly in relation to the growth forecasts and junction assessments for Brockley Hill and Wood Lane and the resultant impact on the A5 (Brockley Hill) and on the Canons Corner Roundabout.

Internal Consultees

Highway Authority: The outline application would be acceptable subject to s.106 contributions and conditions (set out in detail in appraisal section 4).

Landscape Architect: Some concerns in relation to the extent to surface carparking in the EDZ and the WDZ Zachery Merton Building. Overall, the proposed development provides an opportunity for a designed, well planned and coordinated Landscape Masterplan, to provide a visually attractive setting for the new buildings and surrounding rural areas. Details of landscaping and landscape management should be required at reserved matters stage, or by condition.

Tree Officer: The survey appears to be objective and an accurate assessment of the trees' amenity value. The loss of so many B grade trees is unfortunate. It is accepted however that many of these are of average/moderate quality and have limited retention span (20 yrs or less): these trees would be better replaced with a diverse selection of good quality trees & hedging. No objections subject to conditions relating to the provision

of replacement trees and tree protection measures.

Conservation Officer: No objections to the loss of the locally listed wall or the impacts on the setting of Grade II listed Brockley Hill Farm and Barn. The proposal would preserve the Conservation Area and its setting given the dense screening already in place. It is recommended that detailed design gives consideration to the setting of the 18th century obelisk. The proposal would have a negligible impact on the setting of the other locally listed buildings. The impact on the setting of the Grotto and Brockley Grange would be negligible.

Biodiversity Officer: All surveys have been carried out in accordance with relevant standard guidance. Advise against the main hospital entrance being situated on Wood Lane as this may lead to an increase in traffic and an increase in wildlife accidents will ensue. However, a reduction in wildlife accidents would be anticipated if accident prevention measures are implemented. No objections with regards to other aspects of the proposed development subject to imposition of conditions relating to habitat enhancement, creation and management and appropriate mitigation for protected species.

Drainage Engineer: Conditions recommended in relation to both outline and detailed element. These relate to surface water storage and attenuation, SUDS and sewage disposal.

Environmental Health: Contaminated land: Conditions are recommended. Noise: A comprehensive noise study has been prepared of proposed noise impact during construction. They have suggested several mitigating noise measure which we are happy with as there should be minimal noise effects on the amenity. But it may be more prudent to apply some standard conditions. Air quality: Satisfied with their assessment of impact on local air quality so no need for any planning conditions. Dust could be a problem from demolition and construction works, but should be insignificant with the mitigation listed, e.g. from the GLA best practice guidance, with a dust management plan (possibly incorporated into a construction environmental management plan). As the development will be large scale and over many years, it might therefore be prudent to impose a condition to this effect. In relation to odour, the Environmental Statement conclusions are made taking into account a 25 m buffer zone between the site boundary and the proposed development. In view of this, and the conclusions of the comprehensive odour survey, I have no adverse objections to the application.

Economic Development: The Economic Development Unit welcomes the proposals for the comprehensive redevelopment of the RNOH site to allow for the provision of a state of the art new facility for the hospital. Given the amount of development proposed on site, a comprehensive construction employment training initiative would be put in place. This would be secured through a s106 agreement. It will be a requirement on the developer to submit for Harrow Council's approval a Recruitment and Training Plan.

Housing Officer: The submission contains an offer of 0% social/affordable rent units and 36 (10%) intermediate housing units (staff/key worker units) across the site. It is considered inappropriate to insist on the inclusion of a normal viability review clause requirement given the positive contribution the scheme will make towards the provision of other community benefits. In relation to the proposed intermediary units (staff housing), the Housing Department would wish to see further detailed proposals regarding nomination rights, housing management proposals and rents proposed by the Trust. These variables should be tied to the S106 agreement to ensure long term affordability of the units for future occupiers.

Waste Management Officer: Details should be provided in relation to refuse storage and collection.

Sustainability Officer: The proposed Energy Strategy is unacceptable. Suggest a pre-commencement condition to address this matter.

Metropolitan Police Crime Prevention Design Officer: Condition recommended requiring a scheme of measures to minimise the risk and fear of crime.

Advertisement/Site Notice – First Consultation

Major Development / Character of a Conservation Area / Departure from the Development Plan / EIA Development – Harrow Observer 27/12/2012, Expiry 24/01/2013

On December 19th 2012, site notices were posted at 20 different locations within the London Borough of Harrow and the adjoining Authorities, the London Borough of Barnet and Hertsmere Borough Council - Expiry 24/01/2013

Notifications – First Consultation

Sent: 1383

Replies: 12 (including residents associations and amenity groups)

Expiry: 18/01/2013

Addresses Consulted – First Consultation

Notification letters were sent to properties within a wide area surrounding the site, extending south to London Road, west to Common Road, north to the M1 and east to Brockley Hill. In addition to this, properties within the London Borough of Barnet were also notified by letter. Following advice from Hertsmere Borough Council, notification letters were not sent to properties within this Borough. Eight site notices were however posted within the Hertsmere Borough.

Summary of Responses – First Consultation

Residents Associations and Local Amenity Societies

§ Harrow Nature Conservation Forum

- The Wood Ant Area should be protected by robust fencing to deter pedestrian access
- If it is not possible for vehicles to use the Brockley Hill access, a green bridge should be built to provide a safe route for wildlife crossing Wood Lane
- The main access to both the hospital and the EDZ should be from Brockley Hill
- Developers and Harrow Planners should determine what sort of junction and road improvements would make the entrance safe
- Wood Lane is a narrow rural lane with heritage trees on both sides. It is completely unsuitable as the main access for a major hospital and housing development.
- Increased traffic would kill large numbers of grass snakes, toads, badgers and deer, all of which are known to cross Wood Lane frequently.
- As well as the considerable damage to wildlife populations, impacts with badgers and especially deer will likely cause serious car accidents
- If a layout in which the majority of vehicle access is from Brockley Hill cannot be devised, and increased traffic along Wood Lane is inevitable, then a green bridge should be built to provide a safe route for wildlife between Pear Wood to the south and the RNOH site to the north.
- The proposed access to the housing in the western development zone is a narrow lane running to Warren Lane. To reduce vehicle traffic along this narrow lane, we propose that it serve only the houses in the western development zone and not the proposed apartment block
- The existing west lodge building should be refurbished and donated to the borough for use as a base by volunteer naturalists and school groups visiting the open spaces in the area, with sufficient section 106 monies given to maintain the building for a set

period, perhaps ten years.

§ Pear Wood Nature Reserve

- Putting the main entrance/exit with a roundabout on Wood Lane would increase the traffic enormously and have an absolutely devastating effect upon local wildlife crossing Wood Lane
- The larger mammals would surely pose a danger to humans also, having the potential to cause traffic accidents.
- If the present junction of Brockley Hill and Wood Lane is not good enough and big tail backs do occur there already, then surely this is the place to put a roundabout or perhaps traffic lights.
- Having the main entrance on Wood Lane would encourage all vehicles visiting the hospital or travelling north to drive up through Stanmore and Little Common, instead of driving round and coming up the A5.
- Wood Lane is already becoming a bit of a 'rat run' caused by vehicles avoiding the London Road.
- The Little Common, eastern end of Wood Lane, has also become much more congested recently since the opening of the Islamic Centre and the Hindu Temple.
- More traffic coming up through Stanmore and via Little Common would have a huge impact on this part of our Green Belt which is an 'Area of Special Character'.
- A 'mini roundabout' would not be sufficient to cope with all the cars used for residential and hospital purposes, let alone the new buses and all the lorries that would be used by the hospital both during and after its construction.
- The main perimeter fence should be wide enough for large mammals such as deer to pass through. I trust the same provision will be made in any temporary fencing.
- Pollution is another concern. Pollution has recently appeared at Pear Lake and this may have come up through the ground – has this been taken into account by the hydrologists
- Extremely alarmed to find out that 834 trees are to be removed, some of which have preservation orders on. I trust that all larger trees will have been surveyed for the presence of bats, all species of which are highly protected. I feel that I must ask this as we were not impressed by the surveying carried out by Aspect Ecology for reptiles and amphibians. I know that there are details of the bat surveys available but regretfully have not had enough time to go through them in great detail. Nevertheless it is deeply saddening that so many trees are to be lost from the site. I am not sure that the above described plans include those for service ducts and believe this is a separate planning issue, hence my query.
- These plans are open ended.

§ Elm Park Residents Association

- In favour of the RNOH being rebuilt
- Oppose to the extent of proposed housing in an unsustainable location (PTAL rating 1) which will lead to residents relying almost entirely on vehicles for every day activities.
- The housing is also to be built on the very rare areas of acid grassland and we believe the suggestion to "replace" this loss elsewhere on the site to be highly unlikely.
- We note that some 1400 car parking spaces are required under the Outline application and a further 196 spaces for the detailed application. In addition, there will be a huge influx of visitors, taxis and other transport not necessarily parking but dropping off and picking up, as well as numerous service and delivery vehicles for the hospital and residential units alike.
- Object to the proposed accesses, not just on grounds of safety but also being hugely

detrimental to the surrounding environment of Wood Lane and the Little Common Conservation Area.

- The works access for extremely large heavy vehicles during the associated excavation works as well as the building works has not been detailed in any documentation we were able to view.
- The "Outline" element is so that, at any time in the future, a further increase in levels of housing units or car parking spaces is possible and we strongly object to this "open ended" application.
- No projections of pollution or run off associated with moving the access to Wood Lane which, bearing in mind its ecological and environmental importance, could lead to degradation of the Ancient Woodland in particular and the Wood Lane corridor in general.
- Also what is the projected effect on air quality in this corridor particularly with traffic jams already in existence from the Islamic Temple and Mosque areas?
- Bearing in mind the site is on a gravel base, run off of contaminants could cause major and significant issues in any of the surrounding areas, including Stanmore Common, ponds, water courses and lakes in the area. Surely a detailed survey and methodology report is required on this issue?
- Objection to felling of some 834 trees. The survey work on the trees has been carried out from a planning perspective only and the value of the existing trees has been greatly overlooked or diminished by the reports.
- Concerns about the accuracy of some of the reports being put through for this application. The ecologist's report lists it as a "minor" species only. We do not feel the survey work accurately reflects the reptiles present on site or their numbers.
- If close boarding is allowed during construction, then it is effectively isolating species both on and off site to the detriment of their well being.
- We could find no reports or comments from Harrow's Bio-diversity or Tree Officers.
- Failed to find any communication with the Forestry Commission as to whether they have been notified of the huge tree loss requested
- The application has been rushed through with little time for consultation of the wider public. There should have been at least a public meeting or exhibition of these latest proposals so the wider public is fully aware of the implications.
- We believe that granting an "open ended" Outline application could lead to further applications for increasing any of the housing, parking or associated works and, as such, the applications should be refused.

§ Conservation Area Advisory Committee

- 7 storey elements may be visible from conservation area.
- It would also overshadow the landscaped area.
- There would not be any major impact on the Little Common Conservation area.
- It may increase some traffic, but the provision of buses would ease the traffic.

§ Little Common Residents Association –

- No in principle objection to the redevelopment of the hospital.
- Concerned about further development at the site, mainly because of its impact on traffic flows in Wood Lane.
- It is suggested in the planning application, that the traffic flows would not necessarily increase – this is not credible
- Adding hundreds of houses to the site is going to create several bottlenecks of traffic where the entrances are to be placed or redeveloped along Wood Lane
- Great strain will be put on Wood Lane, Warren Lane and Dennis Lane
- The cumulative effect of the rugby club, the Islamic Centre and the Hindu Temple has

already exacerbated the problem

- Several blind corners on Wood Lane, leading to increased levels of danger to road users and residents
- The main entrance to and exit from should be on Brockley Hill with suitable road improvements to facilitate the flow of traffic

Local Residents

Traffic, parking, servicing and highways improvements

- Concerns in relation to the impact on traffic on Wood Lane, which is already a very busy and over-used route
- Existing traffic results in congestion at the junctions of Wood Lane, particularly the junction with Brockley Hill – the proposed development will increase traffic at this junction. There is no proposal to signalise this junction or put a roundabout here. Suggests signalisation this junction or improving the Brockley Hill / Wood Lane junction
- Concerns in relation to the impact of the residential development on the traffic flows along Wood Lane, which is now a major bypass for Stanmore - The submitted reports suggest that the proposal will change traffic flows but will not increase them. This is a mystery.
- It is obvious that the proposal will put a great strain on Wood Lane, which is totally inadequate for its purpose. Suggests widening Wood Lane near the hospital entrances; Removing the sharp bend; Providing traffic lights at the junction with Brockley Hill and Stanmore Hill; A ban on all construction traffic using Wood Lane for the duration of the development
- Object to the access points for the CDZ being directed to Wood Lane and the access point for the WDZ being directed to Warren Lane. This will increase traffic on an already busy Wood Lane, lead to the destruction of the rural appearance of Wood Lane and cause a threat to wildlife
- The proposal will result in a significant increase in the use of Wood Lane and Warren Lane, and will exacerbate congestion, will damage the environment, the margins of the road and will have a detrimental effect on wildlife crossing the road
- An increase in the use of Warren Lane will be harmful to the natural environment of the parts of Stanmore Common that abut the lane – suggests maintaining Brockley Hill as the main entrance and to introduce a suitable traffic control system at this entrance.
- Concerns that Wood Lane will be turned into a major arterial route
- No need to increase parking over and above the present provision as there are frequent bus stops along Brockley Hill and Stanmore Hill
- Have the hospital considered running a dedicated bus service for patients and visitors?

Character of the area

- Impact on the character of Wood Lane which is a rural road, part of the Little Common Conservation Area and has a distinct character – the proposed development will increase traffic noise in the area
- The opening of visual vistas means the loss of a continuous line of trees and tree spines
- The access on Wood Lane will be detrimental to the surrounding environment and the Little Common Conservation Area
- Object to the loss of 834 trees from the site - There is no guarantee with the proposed destruction of current soil conditions that replacement trees will thrive or mature

- Having the main entrance on Wood Lane would encourage all vehicles to drive through Stanmore and Little Common – this will impact on the Green Belt and the Area of Special Character
- The proposed 7 storey multi-storey car park will be higher than any existing building on the hospital site – it will be intrusive and unsympathetic to the Conservation Area

Ecology:

- The new lighting of the new access road will destroy valuable boundary woodland between the RNOH and the Grove Estate, which is a migration route for bats
- Increased light levels will disturb bat roosts along Warren Lane. No bat survey was done along this road
- Inadequate bat surveys provided
- Destruction of acid grassland habitat on the WZ and the EDZ. Any replacement will not be like for like
- No justification as to why there would be no effect on Stanmore Common
- No invertebrate assessment of site quality – the ecologists paid scant regard to plant, tree and vegetation structure and only assessed botanical diversity
- Disturbance to a badger set would lead to disturbance of a protected species
- Almost half of the woodland area is being lost and the arboricultural report does not consider wildlife value of trees
- Removal of less woodland in the first place will avoid the use of new planting – the arboricultural report has classified trees poorly
- Destruction of trees is to make life easier
- Increase in light levels will impact on the feeding, movement and foraging of bats.
- There has been no assessment of existing dead wood potential on the existing tree stock There is a lot of talk about views and opening up views – what people want is privacy
- The ecology study is a baseline one and there is no schedule for re-examination to determine if the mitigation is actually successful
- Ecology Management is often not adhered to and the site degrades in quality, as a result
- The new pond is effectively ecologically destroyed by having a road surrounding it and by cutting it off from natural surroundings.
- There is no detailed ecological data on the existing bat roosts, the presence of standing dead wood and invertebrate habitat assessments
- Moving the access to Wood Lane will have a detrimental impact on local wildlife

Amenity:

- Loss of amenity due to proximity of new hospital entrances to residential properties
- Loss of house value

Ground Conditions:

- This is a contaminated site – intrusive investigations will be carried out in phase 2 which is too late
- There are no projections of pollution and run off associated with moving the access to Wood Lane
- What is the effect on air quality along Wood Lane
- Details in relation to existing contaminants on-site have not been provided

Planning process and Plans:

- The plans are outdated
- The online and even some hardcopy documents are hard to read and there is document duplication
- This is an open-ended application and there is nothing to stop further development of the site

S106

- The S106 money from such a development should be directed to the preservation and improvement of adjacent wildlife sites, through Harrow Nature Conservation Forum

Advertisement/Site Notice – Second Consultation

Major Development / Character of a Conservation Area / Departure from the Development Plan / EIA Development – Harrow Observer 04/03/2013, Expiry 06/03/2013

On February 13th 2013, site notices were posted at 20 different locations within the London Borough of Harrow and the adjoining Authorities, the London Borough of Barnet and Hertsmere Borough Council - Expiry 06/03/2013

Notifications – Second Consultation

Sent: 1383

Replies: 5

Expiry: 06/03/2013

Addresses Consulted – Second Consultation

As per the first consultation.

Summary of Responses – Second Consultation

Residents Associations and Local Amenity Societies

§ Stanmore Society

- Understand the need for housing development to raise finances
- Fully endorse and support the RNOH redevelopment
- Strong objection to the proposal for the main entrance on Wood Lane – increased traffic on what was one time a country lane

Local Residents

Traffic, parking, servicing and highways improvements

- Concerns in relation to traffic and parking as this is already a major problem for residents in the area
- The existing Warren Lane entrance will be closed – will all traffic therefore use the Brockley Hill entrance?
- Has an independent highways / traffic report been commissioned? If so, has it been scrutinised by Highways Officers?
- The proposed entrance from Wood Lane will create great difficulties for the users of Wood Lane – the road is not adequate for the purpose
- There are several possibilities for a purpose built access on the A41 which could be considered
- Concerned as to how traffic will be affected on Wood Lane and the access road to the hospital. Opposed to any use of common land (eg for a wider road) which is

fundamental to the character of the area.

Amenity:

- Additional traffic will impact on residents amenity

Support:

- Support the proposed redevelopment
- Amazed by the quality of pioneering work that is undertaken but ashamed that society has failed to replace the old Victorian buildings
- Should be proud of this hospital provide it with up-to-date facilities
- It creates job opportunities and prestige for the Borough

Basis for Assessment

The Government has issued the National Planning Policy Framework [NPPF] which consolidates national planning policy and is a material consideration in the determination of this application.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

'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.'

In this instance, the Development Plan comprises The London Plan 2011, the Harrow Core Strategy 2012 and the saved policies of Harrow's Unitary Development Plan 2004 [Saved by a Direction of the Secretary of State pursuant to paragraph 1(3) of Schedule 8 of the Planning and Compulsory Purchase Act 2004].

While this application has been principally considered against the saved policies in the Harrow Unitary Development Plan (2004), regard has also been had to relevant policies in the Development Management Policies and Site Allocations DPDs (Pre-submission Draft) which form part of the emerging Local Development Framework for the Borough.

The draft Development Management Policies DPD will, when adopted, replace the Harrow Unitary Development Plan (2004). Both documents have been subject to two rounds of consultation; between 13 May 2011 and 24 June 2011 on the Council's Preferred Options Development Management Policies, and between 27 July 2012 and 7 September 2012 on the Pre-submission Draft document. They were submitted to the Planning Inspectorate on 8th October 2012 for independent Examination in Public (EiP).

As part of the EiP process the Planning Inspector can consider modifications that address issues of soundness or legal compliance raised by participants. The Council therefore proposed a series of minor modifications to respond to representations made during the pre-submission consultation, and these modifications were themselves the subject of public consultation during Oct/Nov 2012. Public hearings on a range of matters were held by the Planning Inspector during January and, following those hearings, the Council has proposed further post-hearings modifications which are currently the subject of public consultation (March/April 2013). The EiP process will conclude upon the receipt of the Planning Inspector's report, and this is expected in June.

The draft Development Management Policies DPD and the draft Site Allocations DPD do not form part of the 'Development Plan' for the Borough until they are adopted. However,

as explained above, they are at a very advanced stage of the plan preparation process and their relevant content is therefore capable of being afforded substantial weight (taking into account any relevant proposed modifications) as a material consideration in the determination of this planning application.

MAIN CONSIDERATIONS

- 1) Principle of the Development
- 2) Impact on Green Belt Openness and Purposes of the Green Belt
- 3) Impact on the Visual Amenities of the Green Belt and on the Character and appearance of the Area, and the Area of Special Character
- 4) Traffic, Parking, Access, Servicing and Sustainable Transport
- 5) Impacts on Biodiversity
- 6) Provision of Healthcare
- 7) Housing Provision and Affordable Housing
- 8) Residential Amenity
- 9) Impact on Heritage Assets
- 10) Flood Risk and Drainage
- 11) Land Contamination and Remediation
- 12) Sustainability and Climate Change Mitigation (including noise and odour)
- 13) Accessibility and Inclusivity
- 14) Equalities Implications
- 15) S17 Crime & Disorder Act
- 16) S.106 Obligations and Infrastructure
- 17) Mayoral CIL Liability
- 18) Consultation Responses

1) PRINCIPLE OF THE DEVELOPMENT

The National Planning Policy Framework (NPPF) was published by the Government on March 27th 2012. The NPPF does not change the law in relation to planning (as the Localism Act 2012 does), but rather sets out the Government's planning policies for England and how these are expected to be applied. It remains the case that the Council is required to make decisions in accordance with the development plan for an area, unless other material considerations indicate otherwise (S.38(6) of the Planning Act). The development plan for Harrow comprises:

- The London Plan 2011
- The Harrow Core Strategy 2012
- The saved policies of the Harrow UDP 2004

The NPPF sets out policies and principles that local planning authorities should take into account, when both preparing local plans, and determining planning applications. The policies within the NPPF are a material consideration that should be given significant weight. Of particular note within the NPPF is the (much debated) requirement that there is a presumption in favour of sustainable development. Paragraph 6 of the NPPF states that 'The policies in paragraphs 18 – 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system' and paragraph 7 sets out three dimensions of sustainable development:

An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The Government announced its intention to introduce the presumption in favour of sustainable development (in the 2011 budget and the ‘Planning for Growth’ paper) in 2011 and issued a draft NPPF for consultation. Both the emerging presumption and draft NPPF were in the public domain before the Examination in Public hearing sessions of Harrow’s Core Strategy in late summer 2011. Upon the advice of the examining Planning Inspector, the Council undertook a post-hearings re-consultation exercise to *inter alia* solicit views about the implications of these for the Core Strategy. Paragraph 7 of the Planning Inspector’s report into the soundness of the Core Strategy confirms that he took into account representations received in respect of these matters. The published NPPF formalises the presumption in favour of sustainable development and carries forward the thrust of the Government’s intentions for a streamlined, pro-growth national planning policy position as set out in the 2011 draft. Officers are therefore confident that the Core Strategy (2012) is in general conformity with the published NPPF and that, taken together with the London Plan (2011), there is a clear and up-to-date Development Plan for the delivery of sustainable development in Harrow.

The Royal National Orthopaedic Hospital (RNOH) is located within the Green Belt. The National Planning Policy Framework (2012) consolidates previous National Planning Policy Statements and Guidance, including Planning Policy Guidance 2 ‘Green Belts’. Paragraphs 79 – 92 of the NPPF provide policy guidance in relation to ‘Protecting Green Belt Land’, stating that the fundamental aim is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. Policy 7.16 of the London Plan supports the aim of the NPPF and states that ‘the strongest protection should be given to London’s Green Belt...Inappropriate development should be refused except in very special circumstances.’ This is further supported by Policy CS1.F of Harrow’s Core Strategy which seeks to safeguard the quantity and quality of the Green Belt from inappropriate or insensitive development.

Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF goes on to inform the determination of whether any particular development in the Green Belt is appropriate or not, by stating in paragraph 89 that ‘a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt’. It does however set out six exceptions to this, including:

‘limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’ (bullet point 6 of paragraph 89)

The RNOH is a previously developed site within the Green Belt and the current proposal is for the redevelopment of the site. This paragraph of the NPPF is therefore relevant to the assessment of the current proposal.

The Core Strategy (2012) sets out Harrow's spatial strategy for managing development and growth in the Borough over the plan period from 2009 to 2026. The strategy provides a positive plan for ensuring that the Borough's housing, employment, infrastructure and other needs are met over the plan period in a way that contributes to achieving sustainable development. This spatial strategy includes specific reference to the RNOH, reflecting the importance of the site in strategic planning terms; the national significance of the hospital as a leading medical institution and the importance of the site locally as a major employer. It recognises that the existing RNOH facilities are no longer fit for purpose and that redevelopment of the site offers the potential to provide modern, fit for purpose accommodation that befits the hospital's status. The Core Strategy further recognises that such redevelopment offers the potential to improve the openness of the site by rationalising the existing complex of buildings on the site. On this basis, the Development Plan contains a commitment to secure the future of the hospital, subject to there being no conflict with Green Belt policy and preservation of the special character of the Harrow Weald Ridge (Core Policy CS7.D).

The Core Strategy is underpinned by the principle that the Borough's development needs will be met on previously developed land and in accordance with the spatial strategy. The draft Site Allocations DPD gives effect to this and seeks to allocate sufficient, previously-developed sites to accommodate the development needs of the Borough outside of the Harrow and Wealdstone Intensification Area. This draft DPD offers reaffirms the Council's commitment to secure the future of the RNOH site and the modernisation of nationally significant health-care facilities by identifying the RNOH as one of four Strategic "Previously Developed Sites" in the Green Belt.

The Core Strategy recognises the financial challenge in delivering this objective by acknowledging that a component of 'enabling' development may be required to subsidise the cost of the delivering a new hospital. Having explored alternative uses (offices and hotel uses), this hybrid planning application proposes 'enabling' residential development to create necessary revenue to cross-subsidise the delivery of a new hospital. This principle underpinned the previous planning permission and is a material consideration which can carry weight in the determination of the current application. The Core Strategy anticipates that the enabling residential development at RNOH will also contribute towards the Borough's delivery of homes between 2009 and 2026 (Core Policy CS7.J).

It is clear that adopted and emerging policies, subject to specific policy provisions, could support the redevelopment of the RNOH site. The Development Plan recognises that the desirability of securing the future of the hospital would justify the principle of enabling development that would otherwise, on its own, be "inappropriate." Officers therefore consider that the proposal for comprehensive redevelopment of the site to provide a new hospital enabled by residential development taken as a whole is supported by the adopted development plan, subject to there being no conflict with Green Belt policy and preservation of the special character of the Harrow Weald Ridge (this is discussed in sections 1 and 2 of this appraisal). The redevelopment of the site would also accord with the statement issued by the Secretary of State for Communities and Local Government on 6 September 2012 in relation to the re-use of previously developed land in the Green Belt and making better use of this land.

In his Stage 1 response (above), the Mayor of London whilst also considering the principle of development acceptable adopts a slightly different interpretation of development plan and NPPF policy in relation to the application. Whilst recognising that the masterplan components seeking the re-provision of the hospital facilities fall within the scope of the Core Strategy and NPPF as appropriate development, the Mayor considers that the residential development “enabling” the construction of the hospital is “inappropriate development” for the purposes of green belt policy.

Paragraph 88 of the NPPF states that *‘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, is clearly outweighed by other considerations’*. This is supported by draft policy DM23 of the Development Management Policies DPD which states that proposals for inappropriate development which would harm the Green Belt will be refused in the absence of clearly demonstrated very special circumstances. The Mayor believes that in this case, an argument for very special circumstances is required. Officers have accordingly also assessed the application for the residential component of the development (accepting that the hospital development falls squarely under policy for ‘Previously Developed Sites’ in the Green Belt).

In their submission, the applicants have put forward an argument that ‘Very special circumstances’ (VSC) exist to justify the development. These VSC comprise:

§ Delivery of a New Hospital:

The delivery of a new hospital will provide much needed patient care, research and education - enabling residential development is required to part fund the delivery of this new hospital.

The Development Plan contains a commitment to secure the future of the hospital. This commitment is reflective of the importance of the site in strategic planning terms; the national significance of the hospital as a leading medical institution and the importance of the site locally as a major employer.

It is clear that a redevelopment of the hospital is urgently required. The existing RNOH facilities are no longer fit for purpose. Services are currently being delivered in a range of aged hospital buildings, which are predominantly of 1930’s construction. This includes the ward blocks which are classic Nissen hut structures. Since 2000, the Trust has leased a number of modular buildings on a temporary basis to address the issues presented by the aged buildings. The existing estate presents the Trust with considerable challenges. Clinical adjacencies are poor, the theatre complex is comprised of temporary buildings, the internal layout is inflexible and the accommodation does not provide an environment that is conducive to modern standards and methods of care. The facilities fail to adequately support clinical need, patient expectations and care requirements. It is clear that the Trust cannot afford to delay development of a new hospital for much longer.

The Core Strategy recognises the financial implications of delivering a new hospital by acknowledging that a component of ‘enabling’ development may be required to subsidise the cost of delivering a new hospital. For an application for enabling development to be successful, the quantum of development proposed should be no more than is necessary to secure the benefit. A viability appraisal has been submitted as part of the application

documents. The purpose of the viability appraisal is to demonstrate that the proposed quantum of residential units is the minimum required in order to deliver the new hospital, along with infrastructure contributions. Having explored alternative uses (offices and hotel uses) and alternative sources of funding, this hybrid planning application proposes 'enabling' residential development to create necessary revenue to cross-subsidise the delivery of a new hospital.

This appraisal, along with a supporting letter from Trust, concludes that all receipts from the sale of land in the WZ and EDZ are essential to enable the delivery of the hospital. In the first instance, receipts from the sale of the WZ are required to part fund the second phase of the hospital's development; the Private Finance Initiative (PFI) element. Receipts from the EDZ would secure later stages of the hospital delivery. In themselves, these receipts would not secure any one phase of the proposed hospital. Trust borrowings and PFI procurement are also required. Given the scale of expenditure associated with the proposed redevelopment, the Trust is required to achieve business case approval from the NHS Commissioners, NHS London and the Department of Health and Treasury. The submitted documentation acknowledges that funding requirements are not clear for latter phases of the hospitals redevelopment. However, it does make clear that the Trust cannot use these receipts for purposes other than investment in the RNOH site in Stanmore.

Whilst the Mayors Stage 1 response seeks independent verification of the viability appraisal, based in part on the uncertainty around forecasting sales values for the site, Officers from Harrow are fully satisfied that the receipts from the enabling residential development represent the most efficient (in land use terms) and effective way of securing the necessary income to support the PFI initiative and the long term renewal of the medical facilities on the site. Following the GLA comment, Officers are seeking further clarification and advice from the Councils estates department, as well as sensitivity testing from the applicants, to demonstrate that the development quantum's are justified. The unique condition of the site, and the particular characteristics of funding can, in the opinion of Officers, in this case be considered to amount to a very special circumstance.

§ The achievement of beneficial uses of the Green Belt:

Paragraph 81 of the NPPF states that 'Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'.

In this instance, a redevelopment of the site is proposed and this presents an opportunity to enhance the beneficial use of the Green Belt.

The London Plan promotes the development of a strategic network of open spaces for London (policy 2.18). A key element of this policy is to protect, promote, expand and manage access to London's green infrastructure of multi-functional green and open spaces. The North-East of Harrow plays a strategic role in London's network of open and green spaces, as the All London Green Grid Supplementary Planning Guidance recognises Stanmore Common as a large accessible open space within The Brent Valley and Barnet Plateau green grid area. Stanmore Common is a Statutory Local Nature Reserve which is located to the west of the RNOH and provides 48 hectares of woodland and heathland. Further to this, Pear Wood and Stanmore Country Park (both Sites of Metropolitan Importance for Nature Conservation of Metropolitan Importance) are located

to the south of the RNOH. Planning permission has recently been implemented at Wood Farm to the south of the RNOH. This permission secured a substantial extension to Stanmore Country Park.

Core Strategy policy CS1.F states that 'Harrow's open spaces and green grid will be managed as an interconnected, multifunctional environmental resource that contributes to biodiversity, adaptation to climate change, and to people's health and wellbeing'. Draft policy 26 of the Development Management Policies DPD states the 'Proposals for new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space'. Given its location in relation to strategic green spaces, the redevelopment of the RNOH provides a unique opportunity to improve access to and connectivity within the green belt.

The northern part of the RNOH site is not currently openly accessible to the public as a large part of it is fenced off from the main part of the site where the hospital is located. It is clear that this northern part of the site is generally not maintained and underutilised. This part of the site is ecologically rich with areas of acid grassland and natural habitats (discussed in details in section 5 of this appraisal). A key component of the proposed masterplan is the introduction of the Northern Amenity Zone (NAZ). This is comprised of 19.2 hectares of open land at the northern part of the site and between the distinctive development zones. The introduction of this zone is a material difference from the extant scheme, which treated this part of the site as "left-over" space. The submitted Design Guidance and Landscape Strategy recognises that this zone provides the opportunity to provide informal recreational opportunities, habitat creation and links to the surrounding network of green spaces. Both documents set out the key landscape design principles for this zone:

- (i) provide enhanced public access and links to the surrounding countryside;
- (ii) provide opportunities for a wide range of informal recreational activity;
- (iii) accommodate woodland planting to minimise visual impacts and help integrate the proposed development into the Green Belt;
- (iv) retain and enhance the existing landscape structure;
- (v) create new wildlife habitats and enhance existing ones; and
- (vi) provide long-term ecological and landscape management.

The Landscape Strategy sets out broad aims and objectives for the long-term landscape management of the site. In addition to this, a Framework Ecological Management Plan that has been submitted as part of Volume 2 of the Environmental Statement provides a framework for works to be undertaken to establish and manage new and existing wildlife habitats at the site. It is anticipated that these documents will form the basis of a detailed Landscape and Ecological Management Plan.

The above circumstances, are together considered to amount to the "very special circumstances" required by the NPPF to justify inappropriate development. Equally, the Environmental Information submitted in support of the application does not suggest that there is a specific reason why the proposed uses on the site would not be acceptable in principle. .

2) IMPACT ON GREEN BELT OPENNESS AND PURPOSES OF THE GREEN BELT

In order for the current proposal to be considered as an appropriate development in the Green Belt, the NPPF (under bullet point 6 of paragraph 89) requires two criteria to be

satisfied;

- (i) The redevelopment of the site must have no greater impact on the openness of the Green Belt than the existing situation;
- (ii) The redevelopment of the site must have no greater impact on the purpose of including land within Green Belt than the existing situation;

§ Impact on Green Belt openness:

Unlike PPG 2, the NPPF does not give specific guidance on how to assess impacts on Green Belt openness. The London Plan is also silent on this matter. In terms of adopted local policies, saved Policy EP35 of the Harrow Unitary Development Plan (2004) identifies the site as one of five Major Developed Sites in the Green Belt and refers to Annex C of PPG2 'Green Belts'. PPG2 was deleted on adoption of the National Planning Policy Framework (2012). Harrow's draft Development Management Policies DPD contains a specific policy (Policy DM23) which relates to the '*Redevelopment of Previously Developed Sites within the Green Belt and Metropolitan Open Land*'. This DPD is a material consideration and it is therefore considered helpful and appropriate to assess the impact of the proposal on Green Belt openness against this policy. The application includes a Green Belt Position Statement which also uses this policy to consider the impact of the proposal on Green Belt openness.

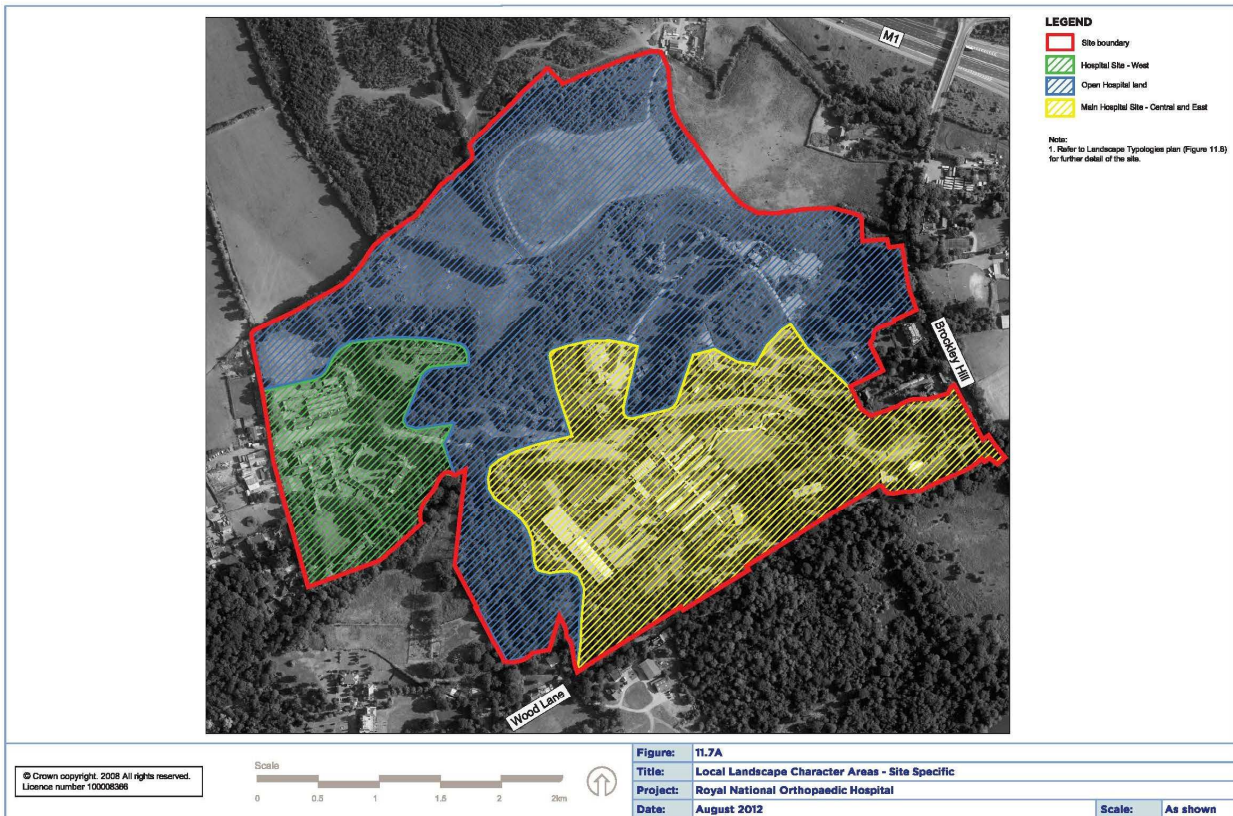
Section A of Draft Policy DM23 of Harrow's draft Development Management Policies DPD states:

The redevelopment or infilling of previously-developed sites in the Green Belt and Metropolitan Open Land will be supported where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

- a. the height of existing buildings on the site;*
- b. the proportion of the site that is already developed;*
- c. the footprint, distribution and character of existing buildings on the site; and*
- d. the relationship of the proposal with any development on the site that is to be retained.*

An appropriate starting point for an assessment of Green Belt openness are the existing site circumstances, and these need to be considered in the context of points (a) – (d) above. A Landscape Strategy has been submitted to the Planning Authority as part of the application documents, and this was revised in February 2013. This strategy identifies three distinct landscape character areas (LCA's) within the site. These LCA's (see map below) comprise:

- The hospital site (West) – shaded in Green below
- Main hospital site (Central and East) – shaded in yellow below
- Open hospital Land. – shaded in blue



The hospital site (West)

- This part of the site is visually separated from other parts of the hospital site, by trees, woodland areas and differences in levels. The land gently slopes from the south to the north. Approximately two-thirds of this area is occupied by buildings, car-parking, areas of hardstanding, or internal access roads and footpaths. There are pockets of open space between buildings, which do provide some setting space for the buildings. The buildings to the south and south-east are generally three storey buildings, and the buildings to the central and northern areas are generally one to three storey buildings. The buildings with the highest ridge height are the Water Court and Chomley Court Staff Residence. These have respective ridge heights of 158.79m AOD and 155.37m AOD and are located at the south-west of the site, towards the Warren Lane entrance. The majority of buildings are predominantly of 1930's construction and a number of these are derelict. An 18th century obelisk, which is a scheduled ancient monument, is located on this part of the site. There are a number of mature trees on this part site, most notable are those that line the internal access road from the site entrance. Members will have observed on their site visit, the more open, if institutional, arrangement of buildings and blocks in this part of the site, together with the limited external views and predominance of "internal, short distance views within the site.

Main hospital site (Central and East)

- This part of the site is almost entirely developed, either by buildings, car parking, areas of hardstanding and internal access roads and footpaths. The main hospital complex is contained on this part of the site with buildings mainly clustered in the central and northern areas. There are small pockets of grassland and woodland located along the southern boundary but due to their limited size, they provide little amenity value. The central hospital buildings are generally 1 – 2 storeys high, whilst

buildings to the north and east vary between 2 – 3 storeys. There are also a number of smaller single storey buildings sited close to the southern boundary along Wood Lane, the highest part of this LCA. The buildings with the highest ridge height are the Spinal Injuries Unit (located at the south of the site, towards Wood Lane) and Eastgate House (located at the south-eastern corner of the site). The Spinal Injuries Unit has a ridge height of 148.10m AOD and Eastgate House has a ridge height of 154.07m AOD. The buildings on this part of the site date from as far back as the 1890's (Eastgate House) to the more recently built ASPIRE National Training Centre (1990's). However, the majority of buildings are predominantly of 1930's construction and include classic Nissen hut structures. Eastgate House is a Locally Listed Building and is of historic and architectural interest. The remainder of the buildings have little or no architectural merit. From a number of locations within this part of the site, views and vistas are entirely "internal" – dominated by the diverse range of hospital buildings and associated paraphernalia.

Open hospital Land

- With the exception of a derelict pig shed, there are no buildings within this area. It contains a former landfill site which is raised plateau with steep slopes on all sides. With the exception of this feature, this part of the site is generally gently sloping from the south to north. Mature trees are generally located along the site boundaries and there are larger woodland areas located to the south-west and centre. Ponds and two orchards are attractive natural landscape features but are generally not well maintained. The northern part of the site is generally more open due to the levels and use as pasture. This offers views towards the M1 which dissects the landscape to the north of the application site.

It is clear from the above that the site has a varied character and that the extent to which openness is perceived across the site depends on location. There are significant changes in levels across the site but generally, the topography has a pronounced fall from the southern site boundary close to Wood Lane, towards the northern site boundary. In addition to this, some parts of the site are densely wooded, whilst others parts have less tree coverage. The northern part of the site is predominantly undeveloped and open. There are far fewer opportunities for open views across the southern, eastern and western parts of the site due to the presence of low-level buildings and dispersed areas of carparking.

The RNOH is located within the Harrow Weald Ridge Area of Special Character, defined by saved policy EP31 of the HUDP (2004). The Landscape and Visual Appraisal contained in both the Environmental Statement and the Landscape Assessment (distant viewpoints) indicate how the Harrow Weald Ridge provides an elevated horizon of tree cover and open countryside which spans across the north of the Borough. Although there are dispersed developments surrounding the RNOH site, the area as a whole, with the exception of occasional new homes (BAE systems site) or more established glimpsed structures during winter tends to be viewed as a continuous wooded ridge due to the woodland of Stanmore Common, Pear Wood and the RNOH.

The current application proposes an area of built footprint, which upon completion would be identical to the existing situation (37,270m²). Unlike the current 'sprawl' it is proposed to consolidate this built development into three different and distinct development zones. The inevitable consequence of this approach is the creation of more intense development within parts of the site. During the intermediate phases, there will be a net increase in footprint overall, as facilities need to be provided before existing building services and

uses can be replaced. This is to ensure that the hospital can remain functional at all times during the construction process. During such times, localised impacts upon openness, may be more acute – with “old and new” buildings sitting tight to one another in the CDZ in particular. In relation to footprint. However, it is clear that upon completion of the development described by the application, the footprint of the development on the site will not change. Notwithstanding this, it is acknowledged that judging impacts on Green Belt openness involves more than a mathematical exercise of comparing existing and proposed footprints.

The masterplan proposes three distinct development areas; the Western Development Zone (WDZ), the Central Development Zone (CDZ) and the Eastern Development Zone (EDZ) along with a Northern “Amenity” Zone (NAZ). This approach is broadly consistent with the extant scheme. The approach contributes to openness by;

- Creating order to buildings and spaces between and improving the site’s untidy appearance: There is a plethora of buildings, structures and hardstanding ‘sprawled’ in an untidy fashion across the southern, eastern and western parts of the site. These structures and features are disruptive to Green Belt openness and do cause harm. There are buildings and hardstanding proposed as part of the sites redevelopment. However, they would be more consolidated and would have a tidier appearance than the existing unkempt situation.
- Creating deliberate and obvious “green corridors” through the site (between the WDZ and the CDZ and between the CDZ and the EDZ): The submitted Design and Access Statement claims that this would maintain and enhance the openness of the site and the setting of the WDZ, the CDZ and the EDZ. It is accepted that the green corridors would provide visual breaks in the built development and would also rationalise the distribution of buildings across the site.
- Providing visual links to off-site green infrastructure and enabling the “inter-connectedness” of sites on the south side of Wood Lane and open land and London Loop to the north, to be reflected in the use and organisation of land, landscape and spaces within the site
- Providing an opportunity for new tree planting/landscaping and pathways to create new vistas/ views and destinations within and beyond the site.

The parameters plans indicate that new buildings within each of the three development zones would not exceed the ridge height of the tallest existing buildings within these areas. This design approach is consistent with the extant scheme and it is considered given the size of the site, its different character areas and its varying topography, that this is an appropriate response to proposed building heights. In some cases, the greater scale of the CDZ, through taller and more substantial building blocks, will bring radical change to local, internal views. These impacts will be balanced by the more modest suburban/domestic forms of the WDZ (and its spaces) which replace institutional blocks of a larger scale and format.

Conclusions based upon the masterplan of the extent of change within each of the masterplan zones is provided below:

§ WDZ:

The WDZ has been subject to much discussion, particularly in relation to how ‘openness’ within the Green Belt is interpreted and achieved.

The proposed parameter blocks, Z1, Z2 and Z3, would be sited towards the western and northern site boundaries. Up to 54 dwellings are proposed which would take the form of two-storey detached houses with habitable roof space. Parts of the proposed development would be concentrated on the footprint of existing buildings but it is clear that some elements, particularly Z3 and the northern part of Z2, would be sited on undeveloped land towards the northern site boundary. Arguably, this is the least visible part of the overall site due to its location, it being the lowest part of the WDZ and also due to the presence of mature trees (to be retained) along the northern and western site boundaries which generally screen it from neighbouring sites.

The layout for the southern part of Zone 1 proposes a new “wedge” of green space to replace more informal and undeveloped spaces between the and around the existing buildings. This would create a permanent area of open space within the WDZ, linking the Warren Lane entrance and the NAZ.

Up to 38 flats are proposed within block Z4. This would be sited in approximately the same location as the existing Zachery Merton building. Similar to the Zachery Merton building, this building would be largely screened by the presence of mature trees and woodland which would, for the large part, be retained. It is unlikely that this would give rise to any greater impact on openness than the current situation.

The tallest existing buildings within the WDZ are the Water Court and Chomley Court Staff Residence. These have respective ridge heights of 158.79m AOD and 155.37m AOD and are located at the south-west of the site, towards Warren Lane. The height of the proposed buildings within the WDZ would not exceed the height of these existing buildings.

Whilst all of the existing buildings within the WDZ would be demolished, the existing 18th century obelisk would be retained and the proposed masterplan offers an opportunity to provide this Scheduled Ancient Monument with an improved setting (supported by the GLA and English Heritage) and to open views towards it.

§ CDZ

The main hospital complex would be contained on this part of the site. The proposed development blocks would be sited centrally (to the east and north of the existing Aspire Centre) and would follow a gentle crescent shape. The Design and Access Statement suggests that the masterplan compactness of the overall hospital footprint; the pulling of the most northern edge of the hospital further south than the previous approved planning application; the creation of two major green ‘shoulders’ along the eastern and western edges and the replacement of a substantial footprint of hardstanding for carparking and irregular parking on grass verges with a multi storey carpark will improve the openness of the green belt. The more compact footprint, consolidated siting (when compared to the previous permission), consolidated car parking (at the lowest point of the site) and new green shoulders to the buildings are recognised for their contribution to openness.

With the exception of the Aspire National Training Centre and the Mike Heaffey Building, all buildings within the CDZ would be demolished. The new hospital buildings whilst providing opportunities to significantly improve healthcare and treatment regimes for patients and clinicians at lower cost, will result in substantial new buildings being introduced in the CDZ (up to 7 stories). This would result in a significant change to the existing situation on site.

There are significant differences in levels within the CDZ. It contains one of the highest points on site, towards the southern site boundary. It also contains the lowest part of the overall site which is in the centre. The proposed building heights seek to take advantage of this topography. The lowest buildings would be sited at the south and would equate to a two-storey building. The highest building would be located towards the north and would equate to a seven-storey building. The tallest existing building within this zone is the Spinal Injuries Unit. This has a ridge height of 148.10m AOD and is located at the south of the site, towards Wood Lane. The height of the proposed hospital buildings within the CDZ would not exceed the height of this existing building. Verified views have confirmed that the new hospital will be partially visible from certain viewpoints to the north of the site, but that the majority of its massing will be concealed by trees and natural topography.

§ EDZ

Up to 255 residential units are proposed across 7 separate blocks. This includes 9 existing staff units to be retained within Orchard Court. These proposed blocks would be sited towards south-eastern corner of the site and include the existing Eastgate House (Z7) which would be retained and converted to flats.

The proposal is to cluster the development parcels around the main internal access road from the Brockley Hill entrance. This is similar to the existing situation on site. The development blocks would be mainly concentrated on the footprint of the existing buildings, and in terms of layout within the Green Belt, this is considered to be appropriate. However, there are two main areas where this is not the case. One of the Z1 blocks (to the east) would be sited on undeveloped land, as would the southern part of Z4. The tallest existing building within the EDZ is Eastgate House. This Locally Listed building has a ridge height of 154.07m AOD and is located at the south-east of the site, towards the junction between Wood Lane and Brockley Hill. The height of the proposed buildings within the EDZ would not exceed the height of this existing building. There is no new development proposed within immediate proximity of this building, and the amount of hardsurfacing surrounding this building would be reduced when compared to the current situation. The Environmental Statement accordingly concludes that the residual significance of effect upon the significance of this building is considered to be negligible. Given the form and density of this development zone, the impact on the appearance (and openness) of the Green Belt arising from the development on the EDZ is considered to be nominal.

§ Summary:

The proposals involve the comprehensive re-modelling of development across the majority of the site. Some aspects of the proposed scheme will introduce new impact to established views of the Green Belt from within the site and beyond – which will in turn change perceptions of openness. Other aspects of the proposed scheme will have a more positive impact, creating new vistas, substantially reducing the clutter of indiscriminate car parking and providing a range of distinct, and consolidated character areas across the site, separated by deliberate spaces and landscaping. Following the site visit, it will be a matter for the committee to form their views on whether the impact on the openness of the Green Belt arising from the development is positive overall. Officers are of the view that, on balance, the masterplan does satisfactorily address this policy test.

§ Purposes of the Green Belt:

Paragraph 80 of the NPPF states that the Green Belt serves five purposes and these are

set out in the form of bullet points. In order to consider if the current proposal would impact on the purposes of including the application site within the Green Belt, it is therefore necessary to consider the proposal in the context of each of these bullet points.

- 1) **To check the unrestricted sprawl of large built-up areas:** It is acknowledged that the site is in close proximity to the residential development to the west, known as the Grove. However, there is no physical connection between the application site and the Grove nor is there any physical connection between the application site and the nearby urban centres within Harrow (Stanmore), Hertsmere (Elstree) or Barnet (Edgware). The proposal would not therefore lead to unrestricted sprawl of large built-up areas.
- 2) **To prevent neighbouring towns merging into one another:** Similarly, the lack of connection between the application site and the above-mentioned centres prevent this from happening. The proposal would not therefore exacerbate the merging of neighbouring towns into one another.
- 3) **To assist in safeguarding the countryside from encroachment:** The site is a recognised major development site in the Local Plan. Some encroachment is long-established through the use of the site for hospital purposes.
- 4) **To preserve the setting and special character of historic towns:** This is not relevant to the circumstances of this site.
- 5) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:** The site contains an untidy 'sprawl' of derelict and aged buildings, internal roads, enclosed compounds, hardstanding and carparking across the southern, eastern and western parts of the site. These structures and features are disruptive to Green Belt openness and do cause harm. Many of these elements would remain as a result of the proposed redevelopment of the site, but they would be more consolidated and would have a tidier appearance than the existing unkempt situation.

Summary

On the basis of the assessment of the development against paragraph 89 of the NPPF, the proposal is not considered to result in an unacceptable adverse impact upon either the purpose or openness of this part of London's Metropolitan green belt. This conclusion nevertheless hinges upon the applicant taking particular care during the implementation of the development, and the satisfactory realisation of the design and landscape parameters defined within the application.

3) IMPACT ON THE VISUAL AMENITIES OF THE GREEN BELT AND ON THE CHARACTER AND APPEARANCE OF THE AREA, AND THE AREA OF SPECIAL CHARACTER

Policy Context and Key Design Considerations

The NPPF states (paragraph 64) that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. The London Plan (2011) policy 7.4B states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. Core Strategy policy CS1.B states that 'all development shall respond

positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design'. Saved UDP policy D4 states that 'the Council will expect a high standard of design and layout in all development proposals'. Section A of Draft Policy DM1 of Harrow's draft Development Management Policies DPD requires all development proposals to achieve a high standard of design and layout.

Core Strategy policy CS1.F states that 'The quantity and quality of the Green Belt, Metropolitan Open Land, and existing open space shall not be eroded by inappropriate uses or insensitive development'. Section B of Draft Policy DM1 of Harrow's draft Development Management Policies DPD requires all proposals for the redevelopment or infilling of previously-developed sites in the Green Belt and Metropolitan Open Land to have regard to the visual amenity and character of the Green Belt and Metropolitan Open Land.

Core Strategy policy CS7.C states that 'identified views of Harrow Weald Ridge will be safeguarded from inappropriate development through the Development Management Policies DPD. Draft Policy 6 of this DPD seeks to protect Areas of Special Character from inappropriate development, as does saved policy EP31 of the HUDP.

Paragraph 66 states that 'applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community' and this is reinforced in London Plan policy 3.7, which seeks the involvement of local communities and stakeholders in the planning of large developments. The proposals have been subject to two rounds of public consultation. The applicant claims that these events, together with the contextual analysis and engagement with officers from across the local authority have helped to inform the masterplan.

The Design Response

In the main, this application is submitted in outline, with all matters reserved for future determination. As such, the detailed design, layout and elevational form of buildings is not before the Council, nor is the detailed design of the public realm. The application is however accompanied by a number of documents that seek to explain the design and layout of the proposed scheme: Parameter Plans, Parameter Plan Explanatory Text, Design Guidelines, Design and Access Statement and Indicative Plans, all which were revised in February 2013. The layout of the principle vehicular routes, spaces and development blocks is indicated by the Parameter Plans and would be fixed as part of any planning decision.

Parameter Plans – These set design parameters in terms of site layout, maximum building heights and provision of open space.

Parameter Plan Explanatory Text – This provides further explanation of the parameters but does not justify the proposals.

Design Guidelines – Sets out detailed design guidance for future phases on matters such as massing and scale, frontages, access, orientation, amenity, architectural character and materials.

Indicative Plans – Provide an indication of how the development could come forward.

Design and Access Statement – Provides a narrative as to the vision, objectives, design principles and key design elements of the scheme, including masterplanning and site layout, open space, character areas and landscaping.

The over-arching master planning strategy is based upon the following principles which

are set out in section 6.1 of the applicant's Design and Access Statement (DAS):

- The creation of a compact clinically efficient hospital to be developed within a flexible development framework;
- The delivery of strong north/south green links 'shouldering' the CDZ and containing the future hospital, sited within its southern sector;
- An appropriate level of residential development in the WDZ for private residential use and the introduction of a major new green link through the development linking to the NAZ and existing public footpaths;
- An appropriate level of residential development in the EDZ for private residential use and staff accommodation, designed and phased to respond to the hospital's development strategy;
- A strategy to enable rationalized vehicular access to the hospital and residential zones;
- A complimentary phasing strategy to respond to the Trust's clinical needs and funding ability.

The DAS and the Landscape Assessment (LS) provide an analysis of the character and appearance of the existing site and wider area. The DAS provides an outline of the historic development of the site, and goes on to explain how and why the scheme has evolved through the phases of public consultation, before providing a more detailed narrative of individual zones of the masterplan; the WDZ, CDZ, EDZ and NAZ. In order to assess the impacts of the proposed development, the Environmental Statement (ES) considers the both the landscape and visual impacts of the proposed development. The Environmental Statement claims that the proposed illustrative masterplan provides a sensitive response to the existing site constraints and opportunities, whilst at the same time accommodating the new hospital buildings and associated residential development necessary to secure the future of the RNOH. This is explored in detail below.

Landscape Impacts:

Following the members site visit, it will be clear that the site has a varied character. This is due to the site's topography, the location and dispersal of trees and woodland areas and the untidy dispersal of buildings and haphazard carparking across the site. Notwithstanding the dispersal of aged buildings on the site, the trees, woodland and other landscape features provide in parts of the site an attractive landscape setting and contribute towards the rural character of the Green Belt site.

The Proposed Masterplan:

The masterplan proposes three separate and distinct development zones and an amenity zone. This principle also underpinned the extant planning permission, which establishes the principle of the site's redevelopment. In terms of the visual amenities of the Green Belt and the character of the area, this proposed layout will result in dramatic changes through the creation of more intense development within parts of the site. Arguably, this would be most obvious in the WDZ. However, this change must be viewed in context. At present, there are over 100 hospital buildings and associated clinical paraphernalia to be found in some shape or form sprawled across the site. By consolidating development into three distinct areas, the masterplan allows the provision of deliberate Green corridors to be created. These Green corridors would create new north/south axes and associated views through the site, and they would also create a new carefully landscaped setting for the proposed built development. It is acknowledged that these Green corridors would not be entirely unrestricted, as surface carparking and vehicular routes are proposed at either side of the main hospital building. However, as a whole, it is considered that they would provide a qualitative improvement over the existing situation. The proposal to consolidate

development into three separate development zones would therefore represent an appropriate design response to the site in terms of the visual amenities of the Green Belt and the character of the area. These Green corridors would be fixed within the Parameter Plans.



- Proposed Hospital Element:

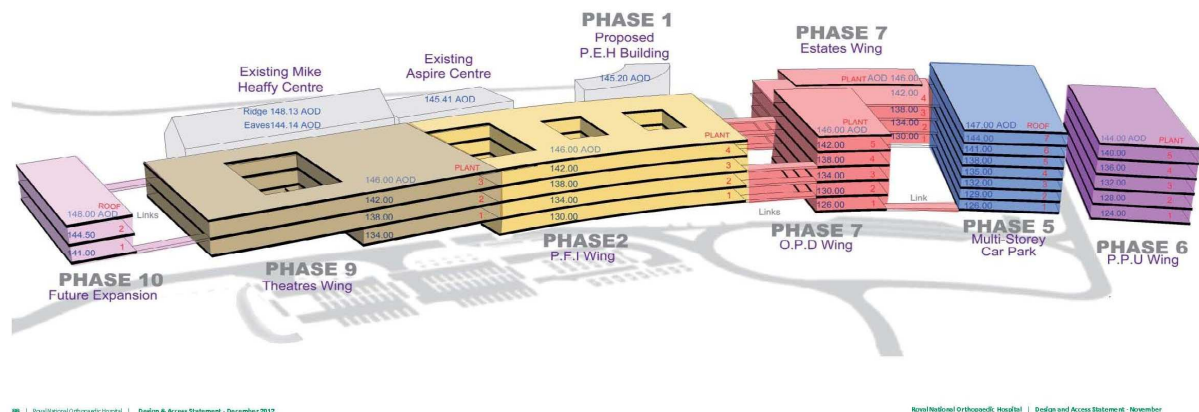
As per the extant scheme, the proposed parameters for the hospital complex would give rise to a substantial mass and physical presence on the central part of the site. To a large extent, this is due to the clinical need for the main hospital buildings to be interlinked. The proposed massing and the relationship of the hospital complex to the site's topography are clearly demonstrated within the submitted Design Guidelines and DAS.

6.6.2 CDZ Scale, Massing & Height

6.6.2 CDZ Scale, Massing & Height

The underlying principles behind the criteria established for the core clinical accommodation, which is all to be located within the CDZ, are not fundamentally different from those attached to the earlier Outline Planning Approval (OPA). In general, the principle has been to contain the overall footprint of the phased hospital development to as compact an area as possible, while still addressing the practicalities of the necessary phased approach, and ensuring that fundamental clinical adjacencies are achieved.

The general location and orientation of the proposed phased development again have not departed radically from the earlier consented scheme, although the footprint of the core clinical accommodation is now reduced (The previously consented scheme had a total clinical footprint, including retained estate, of approx. 30,000 sq.m., whereas the present proposal occupies only 21,300 sq.m.). The building footprint has also been brought further south and has been shortened in the north-south direction, thereby reducing its impact on the northern landscaped zone, which we have now identified as the North Armenty Zone (NAZ).



It is inevitable that the proposed hospital complex would give rise to a significant change to the site's landscape. This must be viewed in the context of the existing sprawl of low level buildings across the site. The GLA Stage 1 report welcomes the consolidation of hospital uses into fewer, larger buildings, arranged in a gentle crescent shape floorplan and taking advantage of the falling land levels, because of the opportunities for new views, and order in the site layout.

The submitted Design Guidelines seek to ensure that an acceptable, cohesive design approach is adopted throughout future reserved matter stages. The Guidelines suggest that the design of the new buildings 'should demonstrate a contemporary architectural language that has its own identity, and relates in a sensitive and appropriate way to the retained estate'. Importantly, they also recognise that the proposed hospital development will be built in phases and that the first phase will set a benchmark in terms of overall design but that ultimately the final development will be viewed as a whole and as such consistency in terms of materials and detailing is crucial. The GLA have emphasised the importance of ensuring good design of these significant buildings and the need to ensure enduring compliance with the design parameters and aspirations in the DAS, and Development Plan policies, and the Mayors associated Design Guidance/SPD.

The overall success of the hospital complex is not only dependent on appropriate and high quality building design but is dependent on a high quality public realm. The Design Guidance pays particular attention to this, referencing appropriate street furniture, lighting and surface materials that could help to achieve this aim. The Design Guidelines specify that the zone to the east of the main complex is intended to comprise the main hospital entrance. This must befit the status of the hospital but also integrate with the rural

character of the site. The Design Guidelines state that high quality landscaping and public art will be central to this particular area. In contrast, the Design Guidelines also explain the importance of private open spaces that will be for the use of patients only (e.g. potential courtyards for patients use only). High quality landscaping is also central to the success of these areas.

As discussed in section 4 below, the hospital exhibits a high demand for carparking spaces. The proposal for a multi-storey carpark (MSCP) will replace much of the ad hoc and dedicated surface car parks. This would significantly reduce the level of hardsurfacing on the site and visibility of parked vehicles, impacting not only on Green Belt openness but also on the visual amenities of the Green Belt and ecology. Subject to location and design details, the proposed MSCP represents an appropriate design if substantial response. With seven storey's, the MSCP is the bulkiest structure proposed. Its indicative location is the central part of the site, which is the lowest in terms of site levels and the indicative location of the proposed Private Patients Unit would serve to break up the perceived mass of the building. The Design Guidance pays particular attention to the north-facing elevation of the main hospital campus and recognises that a careful consideration is required at reserved matters stage in order to achieve a successful transition between the formal structures in the CDZ (including the MSCP) and the more informal NAZ.

- Proposed Residential Element:

The proposed quantum of residential units is considered to be the minimum required to secure the delivery of the hospital. When compared to the existing situation, the development would result in a different 'type' of buildings on parts of the site together with associated access roads, lighting, boundary treatments and other domestic paraphernalia. This must be viewed in context. The existing site contains derelict and aged buildings, a range of internal roads, enclosed compounds, hardstanding and haphazard carparking that are 'sprawled' in an untidy fashion across the southern, eastern and western parts of the site. These structures and features are disruptive to Green Belt openness. The redevelopment of the site provides an opportunity to create a coherent if more ridged layout, which responds to the rural/semi rural character of the site.

Detailed building and public realm designs are not before the Council at this stage. As such, it is necessary to consider the extent to which the submitted Design Guidelines would ensure that an acceptable, cohesive design approach is adopted throughout future reserved matters submissions. Having regard to their locations and varied character, and the proposed building typologies, the 'identity' and character of the two proposed residential zones is intended to be different. This is considered to be appropriate to the circumstances of the site. Crucially, it is intended that the proposed buildings in both zones would be influenced by the rural location of the site. In relation to the residential areas, the submitted documents demonstrate that a high quality scheme that is consistent with the rural character of the site is capable of being delivered, in accordance with the development plan aspirations. The GLA have queried the provision of children's play facilities within the layout of these areas but this concern – to meet the Mayors space standards, is capable of reconciliation at reserved matters stage (subject to condition).

- Proposed Open Space:

A set out in section 2 above, a key component of the proposed masterplan is the introduction of the Northern Amenity Zone (NAZ) which would comprise of 19.2 hectares

of accessible open space. The submitted Design Guidance and Landscape Strategy recognise that this will be more than just left over space in the Green Belt but will provide informal recreational opportunities, habitat creation and links to the surrounding network of green spaces. The Landscape Strategy sets out broad aims and objectives for the long-term landscape management of the site. It is anticipated that this will form the basis of a detailed Landscape Management Plan which could be provided at reserved matters stage, thereby ensuring that the visual amenities of the Green Belt and the rural character of the area are maintained.

- Public Realm

The Parameter Plans propose a number of vehicular routes to serve the proposed development zones and connectivity between them. The Parameter Plans and Design Guidelines propose a clear hierarchy between primary routes, which would provide the main vehicle routes within the site; and secondary routes that would serve as accesses to development blocks. This includes an orbital route to serve the hospital. The Parameter Plans seek to fix these routes. In the main, the existing vehicular route running east to west through the site would be retained and widened where necessary to facilitate bus access (as discussed in section 4). In terms of visual amenity, this is deemed appropriate. It is considered that the submitted Parameter Plans, in conjunction with the Design Guidelines, would ensure that the development complements the rural character of the site, in line with policy objectives. Appropriate limits of “deviation” are incorporated into the plans to enable flexibility with the final detailed scheme/plot design.

One of the overarching landscape principles of the scheme is to provide safe and legible routes through the development, including both formal and informal pedestrian and cycle links and to provide connections between the three Development Zones, the Northern Amenity Zone, the wider countryside and the surrounding network of public footpaths. The masterplan also provides opportunities for casual “rehabilitation” of patients using the new network of paths and roadways – especially within the NAZ and to destinations like the nearby Stanmore Country Park viewpoint. Given the location of the site in relation to strategic green spaces (Stanmore Common, Pear Wood and Stanmore Country Park) and the London Outer Orbital Path (Loop), the careful specification of these paths is imperative to the success of the overall scheme. The Parameter Plans do not seek to fix these routes. However, the Design Guidelines would ensure that an acceptable design approach is adopted throughout future submissions and this could be secured through a S.106 obligation.

The ES proposes landscape mitigation measures in order to minimise landscape impacts, integrate the development into the landscape and to provide to provide benefits to the wider landscape. Detailed guidance for each of the proposed zones are included in the Design Guidelines. The submitted Landscape Strategy sets out broad aims and objectives for the long-term landscape management of the site. These documents will form a framework for a detailed Landscape and Ecological Management Plan which would be required. Overall, the submitted documents demonstrate that a high quality, integrated public realm, consistent with development plan policy aspirations can be delivered throughout the scheme.

- Loss of Trees

Policy 7.21 of The London Plan seeks to ensure that existing trees are retained and any loss as a result of development should be replaced following the principle of ‘right place, right tree’. On sites where there are existing trees, saved UDP policy D10 requires a full tree survey to be submitted, accurately plotting all trees on site with records of height,

spread, health, age and amenity value.

One of the main characteristics of this Green Belt site is the large number of trees and woodland cover of varying ages and condition. The submitted Design and Access Statement advises that a key principle driving the proposed layout has been the retention of as many trees as possible. Due to the scattered nature of trees across the entire site and their close proximity to buildings (in many cases), this aim has presented significant challenges. This has been the subject of much discussion during the pre-application advice process. In order to address this challenge, the application seeks to retain the trees of highest quality and amenity value in the first instance (A grade trees). It also proposes replacement tree planting and landscaping, full details of which could come forward at the reserved matters stage.

A full Arboricultural Report has been submitted in support of the application and this was revised in February 2013 in response to comments from the Council's Tree Officer, who raised specific concerns in relation to how the information was presented. The survey contained in the revised Arboricultural Report is considered by the Tree Officer to be objective and reflective of the trees' amenity value. The GLA response suggests that the information provided is not clear as to the impact of the development on trees.

Members will recall that Planning permission was granted for the removal of 170 trees from the site in January. The rationale behind this application was the statutory protection which is given to birds' nests. This application was approved to enable the first phase of the hospital's redevelopment to be realised. The current proposal would involve the removal of a further 663 trees from the site (including protected trees (TPOs)) and 1.01 hectares of existing woodland. The extant scheme allows for the removal of a comparable number of trees, and this 'fall back' position is a material Planning consideration.

The revised Arboricultural Report confirms that 96.6 % of A grade trees would be retained (i.e. 96.6 % of the trees of highest quality would be retained). The majority of the other removals would comprise trees of lower amenity value and woodland. Critically, the majority of boundary trees would be retained. The impact of the proposed tree removals would be significant and discernible in each of the proposed development zones, particularly during the early years of the development, before replacement planting has matured. However, in the context of the wider site, this impact is likely to be less significant owing to the proposed retention of the majority of trees and 8.42 hectares of woodland on the site overall.

The ES proposes a series of mitigation measures to address these impacts. This includes the planting of replacement trees and woodland - this proposal presents the opportunity to increase the number of high quality trees within the site, as replacements for the lower quality trees that would be removed. Where possible planting would take place in advance of the proposed phases of built development. In line with existing best practice, tree protective fencing will be used during demolition and construction. The submitted plans show all of the trees to be retained as part of the proposed development and some details of tree protection measures are set out in the submitted Arboricultural Report. Notwithstanding this, a condition requiring further specific details of the particular tree protection measures proposed in relation to each of the phases of development would be necessary and this should accompany each reserved matters application.

Despite the significant potential short term impact of the proposal in arboricultural terms,

the proposal presents an opportunity to provide high quality replacement trees and woodland on appropriate parts of the site and hence the opportunity for improved overall landscape quality. These measures are capable of securing the long-term visual amenity value of this Green Belt site.

Visual Impacts:

A Landscape and Visual Impact Assessment (LVIA) has been undertaken and this has established that there are few views of the site from publicly accessible areas in the surrounding landscape. It has also established that views are primarily local with few distant views. On this basis, a total of twenty-two view points, each within 3 km of the site, were identified for detailed consideration in the LVIA. The locations of these view points were discussed in detail in advance of the submission of the application. Thirteen of the identified view points are taken from roads and footpaths immediately adjacent to the site (local), whilst nine of the view points are taken from over 1 km (distant). The likely landscape and visual impacts of the current proposal have been analysed and the full results have been incorporated into the application documents.

- Local Views:

At present, local views are generally limited to glimpsed views due to dense vegetation along the boundaries of the site. Along the northern site boundary, they tend to be limited due to the topography of the site and the surrounding land. The main exceptions to this are from viewpoint 2 (along the southern part of the western site boundary) due to sparse vegetation. Further exceptions are view point 6 (main Wood Lane entrance to the site) and view point 7 (main Brockley Hill entrance to the site). These views tend to be dominated by visual clutter associated with the existing hospital; signage, security fencing, buildings.

As set out in section 4 below, the Transport assessment envisages that vehicles seeking to access the CDZ (Hospital) would over time “re-assign” to use the ‘central’ access in Wood Lane rather than from Brockley Hill. Having explored alternative options, the Transport assessment expects that a new mini-roundabout would be required as a traffic calming measure. Wood Lane has a rural character and it is inevitable that the proposed mini-roundabout would give rise to a significant change to the streetscene in the immediate vicinity of the new roundabout. It is clear from the responses to the consultation process that some local residents view this change as potentially harmful to the character of the area. The concerns are acknowledged and are responsible for the less intrusive highway engineering response embodied in the current application – where the transport effects might otherwise have warranted more substantial re-engineering of the site edges. It is clear from site visits in winter especially, that visual clutter associated with the hospital; signage, security fencing, buildings (view point 6) already impact upon perceptions of the character of Wood Lane to drivers and pedestrians. Improved highway safety (as discussed in section 4 below) and the potential to incorporate pedestrian crossing facilities to the Country Park at Wood farm must also be considered.

In relation to the EDZ, buildings would generally be sited on the same footprint as existing buildings. Having regard to this, the proposed building heights (no higher than existing buildings) and the existing and proposed vegetation along the site boundaries, it is considered that the existing situation will not significantly change as a result of the proposed development. In the CDZ, the proposed hospital buildings would generally be drawn away from the site boundaries. The lowest building would equate to a two-storey building with a ridge height of 148.10m AOD, and would be located closest to the highway (Wood Lane). There is no doubt that the proposed hospital buildings would be

visible from local view points, particularly along Wood Lane (as are the existing buildings). However, it is likely that these views will generally be more positive as new buildings would replace aged and derelict buildings. Furthermore, additional landscaping is proposed within the site and along the site boundaries. In the WDZ, buildings would generally be drawn closer to the northern and western site boundaries. However, the parameters are proposed such that new buildings would not exceed the ridge height of the tallest existing buildings within this area. Having regard to this, the limited opportunities for publicly accessible viewing points in this area and the existing and proposed vegetation along the site boundaries, it is unlikely that the proposed layout of the WDZ would have an undue negative impact upon local views.

- Distant Views:

As stated in section 1, the RNOH is located within the Harrow Weald Ridge, which provides an elevated horizon of tree cover and open countryside spanning across the north of the Borough. In this context, the site is generally not discernable from distant views at the north of the site, as the area tends to be viewed as a continuous wooded ridge due to the woodland of Stanmore Common, Pear Wood and the RNOH. There are no distant views from the south of the site, mainly due to the topography of the land. As discussed, the proposal would involve the removal of 663 trees from the site and 1.01 hectares of existing woodland. However, in the context of the Harrow Weald Ridge, this impact is unlikely to be significant owing to the proposed retention of the majority of trees on the site and 8.42 hectares of woodland, and also the extent of tree cover in the surrounding area.

In terms of scale, the application proposes a range of building heights and sizes across the site. The parameter plans fix the maximum building heights (no higher than existing buildings on the site) and the maximum footprint of zones. As per the extant scheme, the proposed parameters for the hospital complex would give rise to a substantial mass and physical presence on the site. The LVIA has confirmed that this would be partially visible from certain viewpoints to the north of the site. However, the majority of its massing would be concealed by trees (existing and proposed) and by natural topography. As set out in the Design Guidelines, the use of appropriate materials is imperative to prevent the development from playing a detrimental role within the wider wooded ridge. The changes to the landscape panorama associated with the form of development outlined would not, officers consider, erode the fundamental qualities of these views. Nonetheless and as per the GLA request, consideration of long distance views at reserved matters would enable the consideration of the proposed materials and massing of the hospital buildings.

Conclusion

Having regard to the requirements of the NPPF, the Development Plan, and the emerging Development Management Policies DPD, it is considered that the design response set out in the Parameter Plans and Design Guidelines, and supported by the Design and Access Statement and other submitted documents, is appropriate. The development would deliver a number of benefits, such as the provision of useable open space, the delivery of a contemporary fit for purpose hospital complex with its own identity, and the creation of new vistas through the site. Subject to consideration of detailed reserved matters applications, the proposed development is capable of successfully integrating with rural character of the site, and each zone is also capable of creating a unique character in its own right. The scheme would positively impact on the visual amenities of the Green Belt, the character and appearance of the area and the Harrow Weald Ridge Area of Special Character, in line with NPPF and development plan.

4) TRAFFIC, PARKING, ACCESS, SERVICING AND SUSTAINABLE TRANSPORT

Policy Context

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It further recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. London Plan policy 6.3 states that ‘development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed’. Policies 6.9 and 6.10 relate to the provision of cycle and pedestrian friendly environments, whilst policy 6.13 relates to parking standards. Core Strategy policy CS1Q seeks to ‘secure enhancements to the capacity, accessibility and environmental quality of the transport network’, whilst policy CS1R reinforces the aims of London Plan policy 6.13, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan.

Traffic Generation/Site Access Provisions

There are five existing access points serving the site which include the main access into and out of the hospital situated off Brockley Hill, three located off Wood lane and one off Warren Lane. The main access from Brockley Hill is currently the most heavily used aperture with a relatively ‘low key’ use of the remaining four access points. In junction capacity terms the main Brockley Hill access works well within available capacity without notable impediment of traffic on Brockley Hill. The remaining junctions exhibit very minor usage during peak periods without notable highway impact.

The proposed site access arrangements comprise:

- the alteration and retention of the existing entrance point on A5 Brockley Hill for the EDZ and CDZ,
- the alteration and retention of the existing entrance point on Wood Lane for the EDZ and CDZ (Spinal Injuries Unit access),
- the exclusive use of the existing Warren Lane access for WDZ,
- the upgrade and enhancement of the existing access point serving Aspire
- the closure of an existing access, originally envisaged to serve the EDZ on Wood Lane (Institute of Orthopaedics access).

The application is accompanied by a transport assessment, which has been subject to further amendment and reconsultation following submission of the application in response to local feedback and the comments of the adjoining Highway Authorities and Officers.

§ Overview

The current planning application follows from the earlier grant of planning permission for a substantially similar sized hospital proposal, albeit the quantum of residential development now required to “enable” the development has increased from circa 190 units to some 356 combined. In considering the transport impacts of the current proposals, this “fall back” position is nevertheless material.

The earlier planning permission was granted conditional upon the introduction of a range of off site transport mitigation measures, including the provision of a full size roundabout at the Brockley Hill/Wood Lane junction, a £300,000 contribution toward a new bus service and £50,000 for a traffic calming scheme in Wood Lane.

The Transport Assessment accompanying the current application is based upon modelling undertaken using TfL's strategic traffic model for London. In addition, updated traffic counts for Wood lane and Brockley Hill were undertaken, to establish peak and off peak vehicle profiles. Trip rates, based upon comparable residential developments (such as the Grove nearby) and using TRAVL database trips for the hospital uses were used to identify the quantum of traffic expected to arrive and depart from the site at the peak hours.

The hospital operates on a 3 shift basis. This currently coincides with the peak hours on the wider network. The effect of this shift pattern is to place the network outside the site under stress for specific parts of the working day. Outside of the "shift change" time, the Transport Assessment demonstrates that the network operates within normal tolerances. In particular, the junctions into the site and those nearest to the site, at Wood Lane/Brockley Hill and Warren Lane/Wood Lane are free flowing in normal circumstances.

The previous planning permission saw forecast trips and congestion at the junctions rise by up to 5% at both the peak hours. The current application forecasts increases beyond the existing base line level of between 5-10% at the final completion of the development.

The way that the development is expected to be funded, the complex operational requirements within the site, the uncertainty of partner funding for projects such as the Private Patient Unit, and difficulty in forecasting of build rates for the proposed housing makes accurate "interim" modelling of the traffic impacts difficult. The applicants have therefore analysed future forecast years of 2017 (phases 1-8) and 2025 (phases 7-10)

§ Hospital traffic and access

The transport assessment considers the current base line traffic flows through Wood Lane and Brockley Hill during the am and pm peak periods and how they correspond to the existing hospital activity profile during these times. It is apparent that during the am peak there is a steady stream of arrivals and departures from the site between the hours of 07.45 and 09.15 with 2-way peak flows peaking between 08.15 and 08.30. The weekday pm peak profile demonstrates that between 17.00 and 17.15, the 2-way hospital activity is at its peak. On this premise the peak hospital-linked activity coincides with highway network peak periods of 07.30 - 08.30 and 17.00 – 18.00 with a commensurate and rapid decline in profile activity outside of those periods.

The existing hospital consists of a fragmented arrangement of 217 hospital beds. A comparable number of bed spaces are proposed to be consolidated into the new hospital development. In the future there is the possibility of a marginal increase in bed space. The predicted impacts are unlikely to be significant – within the confines of the planning permission. The baseline of vehicular activity linked to the redeveloped hospital should therefore be comparable to current levels of activity. The main difference will be the reassignment of vehicular activity into and out of the site through the several access points resulting from the reconfiguration of site activities with the creation of the three main development zones.

The Transport Assessment envisages that the CDZ proposal will be accessed from the 'central' access in Wood Lane rather than from Brockley Hill - although this access would still be available (and upgraded to allow for through bus access). The Brockley Hill access would also serve the EDZ residential element. Works are also proposed to upgrade the Wood Lane/Brockley Hill junction to a signal controlled junction

(incorporating a pedestrian phase) and to create a mini-roundabout at the entrance to the site on Wood Lane,

The effect of these works and the improvements to the site access points on Wood Lane will certainly be to shift some of the existing traffic to the site, from Brockley Hill to Wood Lane. The Transport Assessment suggests that this shift will amount to approximately 230 trips 2 way in the peak hour. It is important to note however that the *actual* levels of use/reassignment that takes place from one entrance to another will depend upon a range of factors, including the signage strategy, wider network conditions (such as off site congestion elsewhere), the origin of the trips (from staff and visitors), the phase of development/conditions on the site and the tolerance of individual drivers to delay/congestion. Officers expect that as the site develops, this “balance” of assignment between the access points on Wood Lane and Brockley Hill will change dynamically, from day to day. In considering the impact of traffic, the Committee should therefore be mindful of this dynamic condition.

The Brockley Hill entrance has existing and long standing highway safety concerns as a consequence of the sub standard inter-visibility. There is a history of accidents at this junction over the last 5 years (see below). The effect of traffic reassigning from this entrance to the improved access upon Wood Lane is accordingly acceptable in principle from a highways perspective.

Up to the projected completion of the EDZ, activity at the Brockley Hill access would nevertheless remain comparable to current activities (with approximately 250-275 vehicles per hour (2-way trips) generated in each a.m. and p.m. peak period) as the hospital and related uses would still require substantive use of this access. At the projected 2025 completion year, activity is modelled to reduce by some 30% as compared to today’s usage as a result of traffic activity being reassigned to the Wood Lane access.

The Wood Lane access is currently very limited in use at present and the proposed use intensification would require a new mini-roundabout, designed to accommodate all anticipated movements by all vehicles entering and leaving the CDZ, including bus services. The Transport Assessment suggests that a significant proportion of vehicular activity will re-assign from the Brockley Hill access at year 2025. The mini-roundabout at the Wood Lane access will therefore experience the highest uplift in usage as compared to the existing baseline and projected usage for the 2017 and 2025 forecast years with an approximate increase of 50–230 and 80–210 vehicles per hour (2-way trips) at a.m. and p.m. peak periods respectively for year 2025.

Junction capacity calculations for this “worst case” 2025 scenario indicate that the provision of a mini-roundabout will allow the junction to function within its technical capacity on each of the 3 arm approaches without notable delay or impediment to traffic using Wood Lane. Given the representations that have been received – drawing attention to the safety and ecological concerns associated with speeding traffic on Wood Lane, the application envisages some form of traffic calming scheme along the site boundary. Officers consider this proposal, which should incorporate appropriate crossing facilities to the Country Park at Wood farm, as an essential component of the access arrangements to the site – to ensure that the effects of additional traffic on the safety of wildlife, pedestrians and other road users is optimised. It is also anticipated that some street lighting revisions will also be required to further complement designs on road safety. Any lighting solution will need to have regard to the ecological sensitivity of the location and

the rural character of this part of the Green Belt.

These improvements and alterations to enable the hospital access proposals can be delivered through a combination of agreements (under S106 and S278) and planning condition.

§ WDZ (92 indicative residential units) – Warren Lane access

The sole vehicle access to the WDZ residential site is to be via Warren Lane. Minor alterations at the site entrance to facilitate this change are considered to be acceptable in principle. The transport assessment observed traffic volumes currently using the access point to be greater than the forecast usage by the new residential dwellings proposed. The transport assessment uses established vehicle trip rates generated by the neighbouring 'The Grove' residential development of 198 units as it is considered a reflective example of the area context and anticipated future usage profile of the WDZ development of 92 residential units. The trip rates have been validated and deemed representative by comparison with recognised TRAVL and TRICS databases.

On that premise it is estimated that vehicular activity during peak periods would reduce by somewhere in the region of at least 50% following phase 4 completion of the WDZ as compared to the current Hospital related usage with an approximate decrease from 130–50 and 50–37 vehicles per hour (2-way trips) at a.m. and p.m. peak periods respectively. Some of this reduction is achieved by the relative isolation of the WDZ from the rest of the site in vehicular terms which limits usage solely to residents and their visitors. Owing to this reduced intensity of use there are no physical changes proposed to this section of Warren Lane which features a shared surface roadway with no formal footway provisions. In that context the rural nature of Warren Lane will remain preserved.

§ EDZ (264 indicative residential units) - Brockley Hill / Wood Lane (eastern) access points

Following the submission of the planning application, a proposed access point to the EDZ from Wood Lane was omitted. Vehicular activities linked with the EDZ are anticipated to result in a total of 142 and 105 vehicles per hour (2-way trips) at a.m. and p.m. peak periods respectively. These movements will be focused on Brockley Hill and the main hospital access/egress in Wood Lane. This anticipated traffic flow is considered acceptable in the context of overall traffic flows on the surrounding road network. As with the main hospital however, *actual* assignment of trips from the EDZ will depend upon a wide range of circumstances and is likely to evolve and change over time. Improvements to these access points are nevertheless envisaged within the application and will be addressed by conditions.

As referred to within the above 'Hospital' appraisal, up to the projected completion of the EDZ, activity at the Brockley Hill access would remain comparable to current activities (with approximately 250-275 vehicles per hour (2-way trips) generated in each a.m. and p.m. peak period) as the hospital and related uses would still require substantive use of this access. At the projected 2025 completion year, activity would reduce in excess of 50% as compared to today's usage as a result of some trips being reassigned to the Wood Lane access. This reduction encompasses predicted activities linked with the EDZ.

In meeting with local residents, concerned at the assignment of more traffic onto Wood Lane, a suggestion was made that the existing Brockley Hill access be closed, and a new access opened up to the north, alongside a building just outside the hospital perimeter. Officers invited the applicants to consider this as an alternative to addressing the visibility

and highway safety concerns of the existing access point. Whilst no assessment has been provided by the applicants, a preliminary assessment of this option by Officers has suggested that the forward visibility requirements and significant alterations to internal site roads and layout within the site required to enable the solution to be delivered offer no practical benefits over the retained use of the existing entrance.

§ ASPIRE – Wood Lane Western Service Road (WSR) access

This existing access point is to be widened to serve the newly aligned WSR. This will initially facilitate construction processes associated with the enabling works and future phases, segregating construction traffic from the continued hospital operations and will later continue to serve the Aspire unit and the new hospital's servicing area. During construction the access will also serve Aspire and the temporary 121 space car park to the north of the PFI.

There will be a moderate increase in predicted use throughout the phased evolution of the project and this will be generated by construction and Aspire traffic. At scheme completion in 2025 the priority junction exhibits ample spare operational capacity at the forecasted level of activity of approximately 200 2-way vehicle trips (less than 3-4 vehicles per minute) generated in each a.m. and p.m. peak hour period and is therefore predicted to function adequately in the context of the location. The junction as proposed meets current standards related to sight-line provisions and hence is considered safe in operational terms subject to improvements to the bell mouth access (as per the detailed element of the application).

Accident Data for the Local Highway Network

In total there have been 21 reported personal injury accidents in the vicinity of the site for the most recent preceding 5 year period of available data.

Eighteen of these occurred at the following junctions: Warren Lane/Wood Lane (6), Wood Lane/Dennis Lane (3), Rockley Hill/Wood Lane (3), Wood Lane /RNOH egress (1) and Rockley Hill/RNOH main entrance (5). The remaining 3 accidents occurred between junctions on the highway links in Rockley Hill (1) and Wood Lane (2).

It can be argued that most, if not all, accidents are speed related to some degree. However, the majority of accidents listed above can be predominantly attributed to errors of driver judgment rather than outright speed as an underlying cause, with the exception of the 2 recorded accidents on the Wood Lane link which were most likely due to excessive speeding. Otherwise there has been no established pattern or trend in terms of identifying common causation factors for the remaining accidents.

The proposed measures to the site access', the traffic calming along Wood Lane and the off site works described below – including a pedestrian phase to the Wood Lane/Brockley Hill junction - are not considered to result in any additional, adverse safety impacts.

Local Road Network Junction Impact

The scheme will be delivered in 10 separate and distinct phases denoted as 1 -10 spanning an anticipated period of 12 years. The phasing is depicted in plan form and would inherently generate variations of traffic flows on various junctions as phase's progress as compared to those expected on full scheme completion. The Council is satisfied that once the appropriate highway mitigation is identified and where required, implemented, the development can be accommodated without significant anticipated detriment to the surrounding road network. Representations from Brent Council and

Barnet Councils (see below) nevertheless raise some concerns about the effect of the development's modelled impacts upon the wider area network.

It is accepted that the replacement hospital will generate a comparable number of trips to the existing operation. Hence, it is only the residential element within the EDZ and WDZ that will potentially result in any impact on the highway network.

Vehicular activities linked with the EDZ are anticipated to result in a total of 142 and 105 vehicles per hour (2-way trips) at a.m. and p.m. peak periods respectively. The WDZ is anticipated to generate 50 and 37 vehicles per hour (2-way trips) at a.m. and p.m. peak periods respectively. Hence the cumulative additional traffic generated results in a total of 192 and 142 vehicles per hour (2-way trips) during these peak periods.

Traffic surveys undertaken in 2012 indicate that Brockley Hill currently exhibits approximately 1500-1600 vehicles per hour in the a.m. peak and 1300-1400 in the p.m. peak and Wood lane exhibits approximately 900 -1000 vehicles per hour in the a.m. peak and 800 in the p.m. peak.

In that context, the total overall potential uplift in traffic flows in Brockley Hill and Wood Lane equates to somewhere in the region of 5-10% when compared to existing total flows in the corresponding a.m. and p.m. peak periods respectively. This does not factor in any potential further reductions by way of modal shift toward sustainable means of travel resulting from a successful travel plan and parking management strategy.

§ Brockley Hill /Wood Lane junction

This priority junction currently experiences congestion including lengthy queuing on the eastbound approach in Wood lane, particularly during the morning peak period. For the projected 2017 and 2025 forecast years of development the anticipated usage of this junction is envisaged to increase owing to general 'year on' background traffic growth with hospital activities contributing accordingly. The position is particularly acute at year 2025 at 'whole scheme' completion where delays and vehicle queuing is predicted predominantly during the peak hours. As a result of general traffic and population growth in and around London, this situation is likely to occur irrespective of the redevelopment of the hospital.

Owing to the limited highway land available, both within and external to the site, the scope for junction enhancement to improve peak hour capacity is limited. The extant planning permission for a new hospital allowed for a full size roundabout through the planned demolition of the adjacent (and Locally Listed) Eastgate House and an extension into the surrounding fields to the south and east, releasing land to accommodate the proposal.

The current application envisages a signalised junction in place of the priority junction. This solution combines modest physical kerb realignments with junction signalling and would allow for improved pedestrian facilities at the junction, which are deficient at this time (as supported by a Pedestrian Environment Review System (PERS) audit). A '4 stage' signal operation has been considered and would follow a typical 3-arm junction arrangement which allows all vehicle manoeuvres to be undertaken in an optimised manner. The 3 phase stages would facilitate all vehicle movement at the junction with a 4th 'all red' pedestrian phase which is called on pedestrian demand. A new pedestrian refuge positioned between this junction and the existing main hospital entrance in Brockley Hill would also be provided to better link the site with the TfL bus stop on the

eastern side of Brockley Hill, which serves the No.107 bus route.

Initial modelling of the junction for the 3 stage operation (4th pedestrian stage omitted) for the projected 2017 assessment year of operation suggests that the junction would work reasonably well within capacity. Queue lengths on Wood Lane would potentially reduce with the trade off of additional queuing on Brockley Hill as compared the existing priority junction or mini-roundabout option (see below). If the 4th 'all red' pedestrian phase is included within the assessment then the capacity benefit over the priority junction is diminished and replaced with a pedestrian safety benefit.

At scheme completion (by 2025 assessment year) the whole junction would nevertheless be over capacity during the peak hours. This would be the case even without the development due background traffic growth. The actual level of congestion, compared with other junctions nearby on the network, may prompt some traffic reassignment which will depend upon time of year (term time etc) and wider transport/junction conditions arising from other committed development.

The impact of traffic, and the actual (as opposed to modelled) levels of reassignment will be dynamic over the life of the scheme. Officers are of the view that the signalised junction arrangements strike an appropriate balance between vehicle, environmental, heritage and pedestrian safety interests. Nevertheless, following feedback and discussion with local residents, officers have also considered whether an alternative form of junction to the signalised solution proposed, would be appropriate and, in particular, would provide benefits to vehicle flows that would outweigh the potential adverse impacts. Options considered included a mini roundabout, alternations to the existing junction only and a full size roundabout (similar is size and scale to the earlier approved scheme).

- Mini-Roundabout

This is an option that can be physically introduced. National design standards advise that mini-roundabouts are inappropriate for roads exhibiting a speed limit in excess of 30 m.p.h. Brockley Hill has a 40 m.p.h limit. Capacity calculations for the junction indicate that for the future projected years of analysis (2017 & 2025) a mini roundabout would still be overcapacity - leading to vehicle queues and congestion. A mini roundabout would nevertheless result in improved traffic flows on Brockley Hill. The main drawback of this option would be the difficulty in providing enhanced pedestrian crossing facilities - this has already been identified as an issue within the Pedestrian Environment Review System (PERS) audit, undertaken by the applicant. Given the potential increase in footfall resulting from the redevelopment, this is an important consideration.

- Kerb line alterations to the existing priority junction

There is some scope to simply alter junction kerb lines, allowing an improved priority junction through improved manoeuvrability into and out of Wood Lane. This is particularly key in terms of larger HGV's and buses which can at present encounter physical difficulties negotiating the right turn into Wood Lane when travelling southbound on Brockley Hill (A5). Such junction enhancement would improve traffic flow for some vehicles, and provide some consequential improvement to capacity but the improvements to traffic flows would be expected to be marginal.

- Full size roundabout

The use of a full size roundabout would require development of the corner field and re-alignment of the centre line of Brockley Hill. The proposals would improve capacity of the junction and reduce potential queue lengths, but this would impact upon the safety of

pedestrians crossing. It would have significant environmental consequences through the revised levels, land re-profiling, signage, lighting and the effect of “punching through” the existing hedge boundary in the field to the south. The land required to facilitate this junction arrangement is outside of the public highway.

Clearly, a large roundabout would improve vehicle flows. The extent to which this benefit would outweigh the environmental harm to the Green Belt is marginalised by the levels of congestion on the wider network at peak times (notably at the bottom of Brockley Hill at the Canons Corner junction. The freer flowing junction is also considered more likely to impact upon traffic levels along Wood Lane as this would potentially increase ‘rat run’.

Summary

It is the view of the Highway Authority that the introduction of a mini-roundabout is no more desirable than the present situation; that there are delivery issues with the full size roundabout option and that the kerb line alterations provide only very limited capacity improvements. The signalised option with a pedestrian phase is the only option that would afford the enhanced pedestrian environment that the Council seeks. In terms of capacity, the signals option is predicted to reduce queuing in Wood Lane in 2025 and will increase queuing on Brockley Hill but overall the junction would be safer and manage conflicts between opposing traffic streams more efficiently and effectively.

When considering the physical limitations of this location and the need to balance capacity, traffic flow and improved pedestrian environment, it is considered that, on balance, the signalised junction offers an appropriate compromise and is acceptable – subject to conditions that enable the Council and Hospital to manage the changing pattern of use to optimise all interests over the implementation and following completion of the development.

In strategic road network terms this section of the A5 is outside of TfL’s Strategic Road Network (SRN) control. Transport for London are satisfied with the proposals and trip generation figures used in this case and raise no strategic objection to the development.

Partial ‘early phase’ development related impacts on the road network will commence once the WDZ is in place and substantially occupied (2017 onwards). However construction related traffic will impact from the onset of the redevelopment. Given the uncertain and dynamic impacts associated with the changing traffic assignment over the implementation of the development, Officers consider that much of the key junction works should be carried out during the early phases of the development. This will ensure that the effects of the development on the network can be managed safely and that appropriate mitigation and management strategies, including the site parking, can be optimised to minimise as far as possible, wider network impacts.

Impacts beyond immediate highway network

All road junctions leading off Wood Lane and Warren Lane towards Stanmore Hill and The Common operate well under available capacities and are not predicted to be unduly impacted in future years owing to the generated development traffic dissipating to a level that would be de- minimis in junction impact terms. The London Borough of Barnet has expressed some concern with regard to potential impacts on the A5/A410 Canons Corner roundabout junction situated on their borders and the associated traffic forecast used in the analysis.

It is noted that Barnet did not object to the original application for a new hospital and two

new residential development zones at the time of determination in 2005 and at the renewal of the same permission in 2010. Both Harrow and Barnet accept that the baseline of vehicular activity linked to the redeveloped hospital will be comparable to current generated levels, hence there will be minimal variance to existing traffic movements. The predominant change in analytical terms will be activity related to both the residential element within the EDZ and the WDW.

It is accepted that the indicative residential quantum for the EDZ and WDW has increased by approximately 87 and 78 units respectively as compared to the extant permission. The increase in unit numbers is not directly proportionate to the potential increase in vehicular generation, hence a lesser disproportionate rise in traffic generation would be expected in reality.

This is demonstrated in the following comparison table which indicates that the predicted increase in overall traffic generation above that predicted within the consented scheme, particularly for the EDZ element, to be marginal with a more substantive rise in WDW activity. The rise in the latter has however been considered within the capacity analysis undertaken for the network as a whole and it has been demonstrated as containable within the highway network subject to highway enhancements being brought forward as outlined in this report.

	Planning Permission (P/1704/05 & P/0083/10)		Planning Application (P/3191/12)	
	EDZ	WDZ	EDZ	WDZ
Indicative no. of Units	177	14	264	92
Traffic generation at peak (2-way vehicle trips per hour)				
AM	95	7	120	50
PM	71	6	90	37
Assignment/ Distribution assumed for assessment purposes	50/50 split via Brockley Hill and main Wood Lane hospital access /egress. Thereafter a further 50/50 directional split onto Brockley Hill and Wood Lane.	100% via 'Aspire' access road onto Wood Lane. Thereafter a 50/50 directional split onto Wood Lane in an easterly and westerly direction.	50/50 split via Brockley Hill and main Wood Lane access/egress. Thereafter a further 50/50 directional split onto Brockley Hill and Wood Lane.	50/50 split distribution onto the main stretch of Warren Lane (junction with The Grove). Thereafter a further 50/50 directional

				split onto Wood Lane in an easterly and westerly direction.
Potential vehicle impact on Barnet (A5)				
AM	47	3	60	12
PM	35	3	45	9

In response to Barnet's concerns an assessment has however been made based on surveyed flows which have been factored to encompass DfT traffic growth forecasts with apportioning of development related traffic which includes for committed development in Stonegrove. A worst case scenario has been applied for both the 2017 and 2025 projected years of assessment and percentage impacts on the junction do not exceed 3.6% on the A5 Rockley Hill junction arm with the remaining 3 arms (London Road, Spur Road and Stonegrove) affected by substantially less than a 1% traffic increase. Given the dilution of development traffic flows, the predicted low percentage impact on Canons Corner is considered negligible and hence does not warrant mitigation measures.

The London Borough of Brent have also made representations with regard to the residential and public transport mode share forecast which they consider as optimistic for the projected year of 2025.

As part of the mode share analysis the trip rate base assumption for the residential element has been determined from 'The Grove' site adjacent to the RNOH site which is considered representative in terms of it's characteristics of location and public transport accessibility. In the case of the latter, the RNOH site is better located in bus accessibility terms and would therefore benefit further from an increase of public transport modal share and corresponding reduction in private car mode share with a formal bus service cutting through the site.

Although it is anticipated that the WDZ may not in itself reach the envisaged 2025 residential mode split of 55% car borne travel (which is broadly consistent with the Canons ward modal split derived from the 2001 census) due to the related tenure profile, it is however likely to be counter balanced by the "less car reliant" EDZ which will have a markedly improved public transport accessibility with a bus service running through the site. Hence a figure comparable to the predicted 55% mode share should in reality be achieved. With regard to the Underground mode share of 22% also queried by Brent,

what must be factored into this estimation is the anticipated success of both the parking management strategy (PMS) and the site wide travel plan will contribute positively to achieving the predicted mode shift. The proposed PMS is likely to reduce private vehicle movements to and from the site related to the hospital itself. Hence this will valuably contribute to a reduction in overall site traffic generation thereby counterbalancing impacts related solely to the residential element.

Even if the predicted modal shift was a fraction optimistic and favoured the private car, Officers consider that any related traffic generation would be satisfactorily dissipated well before Brent's boundary is reached nearly 3 miles away. It is therefore concluded that there will be no discernable impacts within Brent's domain.

Notwithstanding localised concerns expressed in the representations, the submissions from LB Barnet's (and LB Brent's), the Council and applicants will need to work with neighbouring Boroughs to try and minimise wider impacts of this development on the area. The potential traffic impact is nevertheless acknowledged. This impact will need to be considered in the context of forecast background traffic growth on this part of the network, regardless of this proposal, through surrounding Local Plan development (and London Plan) allocations. Whether the transport impacts on the wider network are sufficient to outweigh the other development plan policy objectives achieved through the proposal is a matter for the committee to consider. Officers will consider this further.

Internal Roadways/Pedestrian/Cycling/Green Grid Provisions

At the 2025 full scheme completion year, the parameter plans highlight a two-tier road layout for both the EDZ and WDZ's of the site consisting of primary routes which serve to connect the internal road network to all points of site access/egress such as at Brockley Hill, Wood Lane and Warren Lane. These primary routes are supported by a secondary route network which acts as a link from the primary routes to the residential dwellings and parking areas. Although the roads are not proposed to be adopted by the Highway Authority, they will be of high quality and constructed to adoptable standards.

The application proposes that an emergency access only would be available between the WDZ and the CDZ, effectively isolating the WDZ. The EDZ is to be served by the revised and improved access off Brockley Hill which serves as the hospital at present.

The CDZ varies from the two residential development zones in that a single-tier road layout is applied. It will consist of some of the existing road network but will predominantly require substantive new road provision allowing for an 'orbital route'.

The combined 'new and old' network will importantly incorporate scope for widening of the site spine road to facilitate the diversion of a future bus service through the site, running between the existing main Brockley Hill and new Wood Lane (mini- roundabout) access. The realisation of this objective is a key part of the mode shift strategy which in turn creates a tolerance for the car parking levels proposed across the site.

At this outline stage it has been demonstrated that larger vehicles such as refuse trucks can traverse through each of the 3 development zones without impediment allowing them to enter and leave in a forward gear as is recommended best practice on safety grounds. The existing and new roadways which connect the EDZ with the CDZ can feasibly accommodate an acceptable road width to facilitate future bus service requirements but some sections of existing roadway would require localised widening. Final design solutions could be secured through planning conditions and will need to reflect the

practical difficulties in some sensitive locations where the proximity of mature trees limits specific widening. This provision of new hard surfacing will be counter balanced by the removal of redundant roadways thereby least compromising the Green Belt.

At phase 5 with the provision of the MSCP, a temporary (2017-2025) 'ring road' connecting with the east/west estate road and the WSR will be constructed around the new and existing hospital operations within the CDZ to facilitate subsequent development build phases. At phase 9 (2025) the ring road will be substantially revised to marry with the final designs as set out in the submitted parameter plans.

To facilitate pedestrian and cycling activity there will be comprehensive network of formal and informal path links which are to connect all the development zones including the Northern Amenity Zone (NAZ) which is encapsulated within Harrow's Green Grid network. This will allow for a Green Link to be created between the Stanmore Country Park within Wood Farm (on the southern side of Wood Lane) and the NAZ. There will also be the opportunity to create the desired linkage between the site and the London Outer Orbital Path (LOOP) which partially follows the contour of the site boundary.

This green link gateway to the NAZ through what is the middle of the site will be facilitated in line with the phased programme therefore it will come to fruition once the phase 9 element is complete in 2025.

Detailed designs for the all the road layouts and how they interact with the Green Link provisions, servicing/delivery/emergency service aspects together with pedestrian and cycle facilities thorough the site will be subject to future reserved matter applications as they come forward as part of the phased regime of the project. At the reserved matters stages it will also be expected that some of the secondary and more minor access roads leading to residential parking areas will be traffic calmed in a 'Home Zone' fashion to achieve the desired aim of affording sustainable travel modes such as walking and cycling a clear priority over the motor vehicle.

At this illustrative outline stage the designs broadly follow the principles as set out by the Department for Transport's Manual for Streets (2007) best practice for new development streetscape design and are therefore considered acceptable in that context.

Bus Route 'through site' Provision and Viability

The unique location of the site on the borders of Harrow and Hertfordshire does not help in the promotion of public transport access. However a new bus service (615) operated by Hertfordshire based UNO commenced last summer now runs via Rockley Hill and Wood Lane and connects the site with Stanmore Station. The service is contracted to run until June 2015. The hospital also runs a frequent and relatively successful free shuttle bus service to and from Edgware and Stanmore Stations with numerous pick up and drop off points within the site itself.

In accepting the high on site parking levels for the CDZ, it is considered that the applicant should also work to further improve public transport provisions to this site. In discussions between the Council and the applicant, Officers sought to secure the routing of bus services through the site (as opposed to dropping off and picking up on the periphery) in order to, minimise the mode shift penalty and improve the amenity, convenience and safety of users of public transport.

The whole development will undergo a phased construction process commencing in 2013

with completion in 2025. Owing to the site's road configuration and overspill parking on the existing roadways it is not possible to consider routing a formal bus service at this time. It is therefore accepted that the hospital will maintain their free shuttle service until such time a formal bus service can physically traverse the site. The earliest this can potentially occur is anticipated to be at the completion of phase 5 in 2017 by which time the PFI hospital, WDZ, EDZ (stage 1) and MSCP with revised road layouts surrounding the hospital.

As, the revised internal road network will not be fully complete until phase 10 scheduled for completion by 2025, bus routing from phase 5 (2017) is likely to be facilitated via Brockley Hill and the east/west estate roadway linking through to the Western Service Road (WSR) - this will also serve as an access facility for construction purposes and the Aspire centre. Alternatively if construction related activities make the western service road inappropriate for bus use then the newly built link road linking the east/west estate road and the Wood Lane access to the CDZ (served by a mini- roundabout) would be utilised. This would require an early intervention with regard to the introduction of the mini-roundabout scheduled for 2025 (phases 9 & 10). This and other detailed aspects such as bus stop locations within the site would be determined at a future reserved matters application stage.

By phase 9/10 (2025 completion) the internal road network will be complete and will then allow for a bus service to enter and leave the site through Brockley Hill and the new Wood Lane mini-roundabout hospital access as originally intended.

There are two service operator choices available to provide a 'through site' service via the Brockley Hill and Wood Lane access /egress points:-

- UNO Bus Service

The current UNO 3 year service contract (external to the site) terminates in mid-2015 and there will be the opportunity to renew this contract for a further 3 years, with a possible clause to re-route through the site (in 2017). Early indications suggest that the operator may be conducive to the proposal. To ensure continuity of the service from 2015 onwards, whether it be through the site or via the Brockley Hill /Wood Lane highway network, it would be expected that the applicant would fund the service via legal agreement until contract renewal in mid-2018 at a cost of £100,000 per annum. However, this would however only be necessary if UNO demonstrate a lack of patronage which would therefore require continued financial 'pump priming' to justify maintaining a service.

Following this period, it is likely owing to the substantial completion of the scheme that the service may be financially self sustaining (i.e. the uplift in patronage will cover UNO's service operational costs and profit which would then cease direct financial contribution to UNO). However if this is not the case, it would be envisaged that monies raised through the hospital charging regime as outlined within the parking management strategy (PMS) would subsidise the service either partly or fully.

- TfL Bus Service

A TfL service does have some notable benefits as compared to UNO, such as the wider ticket availability including Oyster card recognition and wider promotional capabilities which UNO are not in a position to deliver.

TfL advise that it would be unfeasible to offer a through site service until full completion of the scheme at phase 10 in 2025 owing to the requirement for a completed and fully linked

internal road network to satisfy their service needs. An earlier provision of a service would diminish the likelihood of satisfying TfL's criteria for providing a service, in terms of potential patron numbers.

To fully justify a bus service, TfL's criteria demands that 400-500 daily bus trips are required with developer contributions of £220,000 per annum over a five year term. Again this could be potentially funded by way of receipts raised from the hospital parking charges (either fully or partly). After that time the service would be continued and funded by TfL if this level of anticipated patronage is achieved or exceeded. The applicant has demonstrated that once the scheme is fully complete in 2025, a forecasted 348 daily bus trips are likely without factoring in the anticipated positive impacts of the PMS and the strategic travel plan (STP) in modal shift terms.

It is possible that at scheme completion in 2025, TfL (or equivalent authority at the time) may accept this slightly lower figure and provide a service at cost. The free 'through site' hospital shuttle service would need to be maintained until such time that a new provider such as TfL is contracted to undertake a service. TfL's business case would demand that the shuttle service be terminated at that time to avoid a potential reduction in patronage and hence justification of a bus service.

At scheme maturity at phase 10, bus routing would be achieved by a suitable road arrangement through the site with a bus route (possibly No.324) turning left into the site from Brockley Hill, running through the EDZ and terminating in the CDZ. Buses would then leave the site by turning left onto Wood Lane, using the enhanced CDZ mini-roundabout junction and routing through the Brockley Hill/Wood Lane junction. To aid bus movements and running times through this junction, TfL have indicated that bus priority measures such as selected vehicle detection (SVD) mechanisms be applied if a signal installation is introduced at the Brockley Hill/Wood Lane junction. This would speed up journey times. Although the internal roadways are not proposed for adoption by the Highway Authority, they will need to be of appropriate quality/alignment to cope with larger vehicles including buses. In lieu of formal adoption, TfL require a licence agreement to be in place to safeguard their service operation.

In terms of internal bus stop infrastructure, TfL accept that the service would terminate within the CDZ in proximity of the hospital entrance. Bus stop/stand and bus driver provisions would fall in-line with TfL's relevant design standards.

TfL also require an internal site road width of 7.5m to facilitate ease of bus movement within the development envelope. Studies show that the relevant existing and new roadways which connect the EDZ with the CDZ can physically accommodate a comparable width but some sections of existing roadway would require localised widening. Final designs would be secured at later reserved matters stages and will need to address impacts on trees, green space and the residential character of the EDZ.

Summary

It is clear that a bus service can be provided through the site which will clearly have positive implications in helping to achieve a modal shift toward sustainable means of travel to and from the site.

TfL have confirmed that a TfL sponsored service is in reality unlikely to be achieved at an early stage of development as a more stringent 'patronage' criteria (as compared to UNO) is applied to justify new or re-directed services. A TfL service albeit more desirable

in terms of ticket compatibility as compared to UNO would therefore potentially come forward at the end of the project at phase 10 in 2025.

In the interim period prior, to full scheme completion, the continued delivery and operation of the UNO service should be supported. It is also considered important that the access to the site by buses is maintained within any planning permission so that the “facility” is available to TfL and/or other future bus operators and safeguarded by way of condition/S106 obligation.

In order to maintain service continuity throughout the development phases, consistent with supporting mode shift targets for staff and visitors, arrangements will therefore be required to ensure that bus services to the site can be maintained, and in the longer term enhanced through both access and financial support where required.

Development Phasing

Phase	Development Phase	Completion/ occupation by
N/A	Enabling works	2013
1	Princess Eugenie House and Graham Hill Unit	2017
2	PFI hospital development	2017
3	EDZ key worker/ staff accommodation	2017
4	WDZ residential development	2017
5	Multi-Storey car park (MSCP)	2017
6	Private Patients Unit (PPU)	2017
7	Outpatient Department, Estates and administration block	2025
8	EDZ residential development Stage 1 – 37% provision Stage 2 – 63% provision	2017 2025
9	New hospital theatres	2025
10	Future potential hospital expansion	Post 2025

Car Parking Provision

This outline application (in the main) and parameter based approach does not furnish the Council with full scheme details such as precise parking locations and their interaction with the street scene. As the overall scheme would progress on a phased basis, these important details would be appraised within future planning applications. This means that a ‘strategic overview’ is cast over the proposals at this stage allowing for later determination of total parking quantum and appropriate mechanisms to establish an internal parking management regime.

- Central Development Zone (CDZ) - Hospital Car Parking Provisions

There are currently in the region of 722 car parking spaces both formally marked and

informal in nature spread throughout the whole site. There are no on-site management regimes that attempt to constrain the number of vehicles on-site at any one time as available parking is purely demand lead.

Updated parking surveys undertaken last year indicate that demand raises the site parking to approximately 1015 vehicles. Such uplift is accommodated within the site by a high level of injudicious parking, with some undesirable encroachment onto landscaped grassed areas. Throughout the development, the hospital will continue to function as normal and this quantum of parking will be maintained where possible. The redevelopment of the site allows for the opportunity to rationalise and review this current position with the consolidation of hospital buildings in the CDZ.

Although there are no prescribed parking standards for C2 hospital uses within the 2011 London Plan, both the Highways Authority and Transport for London (TfL) wish for sustainable travel modes as far as is reasonably possible. This needs to consider that the site is relatively poorly served by public transport with a Public Transport Accessibility Level (PTAL) rating of 1. However a new bus service operated by Hertfordshire based UNO which runs via Brockley Hill and Wood Lane commenced last year and conveniently connects the site with Stanmore Station. The hospital also runs a free shuttle bus service to and from Edgware and Stanmore Stations with numerous pick up and drop off points within the site itself. It is the intention that all available mechanisms would be applied to encourage the transfer of visitors and staff to sustainable travel modes thereby reducing and minimising end user parking demand.

On the premise of existing patient/visitor and staff demand, it is proposed to maintain the existing total on-site quantum of approximately 1015 spaces but in a consolidated and rationalised. This is to be achieved by enclosing the vast majority of spaces, totalling 805, within a seven storey multi-storey car park (MSCP). 88 spaces surface parking spaces would be located in close proximity of the new hospital with a further 50 spaces located below the proposed Private Patients Unit (PPU). 75 spaces would be provided for the existing Aspire unit which is to remain within the development envelope. This equates to a total quantum of 1018 parking space provision for the CDZ.

To justify such a provision, the applicant proposes a specific management strategy be introduced, aimed at promoting mode shift.

- Parking Management Strategy (PMS)

A PMS (applicable to the CDZ) is expected to efficiently address both on and off site parking arrangements in order to achieve a controlled and enforced environment which safeguards the design aims of the scheme, the Green Belt and the surrounding public realm external to the site. The application proposes that a PMS is to be supplied for each relevant phase of development. The PMS would be supported by charging and enforcement structures such as the introduction of pay and display controls within the MSCP and surface level parking areas. Staff would be required to obtain a 'charged for' parking permit under a strict criteria which encourages the use of alternate sustainable travel modes such as public transport, car sharing etc. This will assist in ensuring that parking demand is reduced and managed coherently over the operational life of the hospital.

Discussions between the Council, GLA and applicants originally suggested that the revenue raised from charging practices would potentially provide the opportunity to support improved bus connections and to enable a bus to be routed through the site in

the long term. However, the financial appraisal suggests that, for the multi storey car park, the revenues raised might be required to fund that part of the development.

To successfully deliver the charging approach, an effective enforcement regime is to be provided to ensure conformity to the charging structure. This will provide a holistic solution to the aims of achieving an exemplar scheme on this site.

To ensure that the whole site benefits from this process, both the EDZ and WDZ residential elements would be covered by the same enforcement regime but without the pay and display aspect. This would pre-empt any potential migration of car users of the CDZ to the residential areas in an attempt to avoid payment. This would ensure that roadways and green amenity spaces are protected and maintained in-line with design aims.

On the basis of a successful internal PMS, it must be anticipated that there is potential for the surrounding public road network to be impacted by some displaced parking. It would be the responsibility of the Council to introduce/enforce parking control on adopted highways. Once the substantive element of the Hospital redevelopment is completed at phase 2 stage anticipated to be by 2017, a monitoring regime of the surrounding road network would be expected. Any S106 should make provision for the monitoring, and if required, introduction of car parking controls at the applicants expense.

- Strategic Site-Wide Travel Plan (STP)

A Strategic Site Wide Travel Plan (STP) has been submitted on an area wide basis encompassing the whole site. Specific and detailed travel plans will inform this overarching STP as the development evolves through the phased build. This approach conforms to Transport for London's (TfL) established guidelines to achieve a modal shift away from the private motor car thereby leading toward a sustainable personal travel mode to and from the site.

Owing to the long term and phased evolution of the project, the STP adopts a broad approach to maintain flexibility to cater for change over the projected 12 year build period.

Implementation, monitoring and management of the STP would be undertaken by an appointed single Travel Plan Co-ordinator who would work in partnership with the Highways Authority, TfL and stakeholders within the site. Therefore under the STP, an overall modal shift target for the reduction in private car travel linked to the residential EDZ and WDZ's would be in the order of 10-20%. To achieve this aim, modal shift targets relating to all sustainable travel modes such as walking, cycling, public transport use would be established post permission.

Recent travel surveys undertaken by the applicant indicate that 79% of existing Hospital staff travel to work as sole occupants of their private motor vehicles. The applicant accepts that this figure of 79% can be reduced in the long term. On this basis, it is considered realistic to apply a flexible target aim in the region of a 19 % reduction in single occupancy private car use in perpetuity which the applicant has accepted.

With regard to patients/visitors, there appears to be evidence of an even distribution of private car usage modal split with 24% single occupancy car travel, 25% car driver with passenger(s) journeys and 25% car passengers only. Some of the remaining 26% utilise sustainable means. The applicant proposes that such activity is not subject to any

specific 'target' modal shift regime as patients are not able to travel by other means owing to their health status coupled with the nationwide catchment. This is accepted by the Council. However, in the case of visitors, it is considered that some success can be achieved in terms of encouraging a modal shift toward sustainable travel modes. It is nevertheless considered helpful to apply a target aim of 5-10 % reduction in single occupancy private car use in perpetuity.

At substantive completion of the project (phase 9), a full review would be undertaken to ensure that the individual travel plans for each appropriate phase over the 12 year period conform to STP 'whole site' objectives. In order to ensure the success of the STP and individual travel plans, a financial 'Performance Bond' would be applied as this would act as a clear incentive toward meeting reasonable SMART targets set post permission for both the STP and individual travel plans. This Bond would amount to £30,000 and cover on-going monitoring costs and assist in guaranteeing the target based performance of the STP.

Full detailed Travel Plans for each relevant phase of the development will therefore be submitted post permission and secured under a S106 agreement. They will relate to the narrative within the submitted overarching strategic site wide area travel plan.

- EDZ / WDZ - Residential Parking Provisions

The London Plan (2011) sets maximum parking standards. However it is highlighted that in certain relatively unsustainable locations, there is a danger of parking under-provision which may have the consequence of encouraging injudicious/inappropriate parking occurring irrespective of stringent on-site parking enforcement.

Both parking quantum's for the EDZ and WDZ are based on the indicative development mix provided. Although, they are at the higher end of the maximum parking standards set by the London Plan (2011), they are considered acceptable in this respect. Final parking quantum, in accordance with the London Plan standards, are to be determined at future reserved matters stages when a precise development mix will be secured.

The new hospital and residential segments will be afforded electric vehicle/disabled provision in line with LP 2011 standards (or relevant standard at the time) for sustainable private car travel at the reserved matters application stages, which the applicant has acknowledged.

- Pedal Cycle / Motor Cycle Parking

In relation to the EDZ and the WDZ, final cycle parking quantum, in accordance with the London Plan standards, are to be determined at future reserved matters stages when a precise development mix will be secured.

The provision of cycle parking for the hospital use is to be at a level of 1 space/ 5 staff and 1space/10 visitors. This too would be determined at Reserved Matters stage. Discussions with the GLA have indicated that this can take account of the shift patterns.

In accordance with the Council's Local Development Framework (LDF) and accepted good practice, there should be a motor cycle parking provision equivalent to 5% of the total car parking quantum for each development zone.

Detailed provisions for both facilities will be considered and secured under a future reserved matters submission at the appropriate phase.

Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

In terms of construction works it is anticipated that HGV flows to and from the site will naturally be variable, although some indications are provided within the Transport Assessment. The potential impacts and activities resulting from each phase will be unique and must be mitigated against in order to minimise/avoid potential detriment to the public realm. Full and detailed CLP and SDP will be secured under a planning condition considering the constraints and sensitivities of the local road network. As part of the penultimate phases 9 & 10, a comprehensive overarching SDP will be provided to reflect the substantive maturity of the scheme.

Detailed element

The revised roadway will be widened to cater for two-way traffic and will be substantively straightened, allowing for the new WSR to initially facilitate safe construction access. Vehicles for the Aspire Centre will also be afforded use of this enhanced route. A revised parking layout specific to Aspire is also proposed - 75 spaces are proposed as compared to the 39 existing. There are no specific parking standards associated with Aspire's multi-function rehabilitation, training, leisure use. It is considered that demand indicates a healthy use of the existing provisions with rampant injudicious parking on the nearby roadways and landscaped areas - this forms a justification for a rationalised and enhanced parking provision for Aspire patrons. On this basis the quantum proposed is considered acceptable.

To cater for the wider WSR provision the existing access from Wood lane will be widened to the east to allow the new roadway to perform its new functions. Such alterations have been considered in the context of the ecological sensitivities of the southern site boundary. When construction works are complete, the WSR will then continue to serve the Aspire unit and the new hospital's servicing area.

The proposed temporary car park (five year term) consists of 121 spaces north of the PFI plot. This is considered a crucial element of the enabling works as it is to provide replacement spaces for the 120 patient/staff surface car parking spaces which are to be lost as a result of the new hospital construction site. It will therefore allow for the continuity of clinical care during construction phases 3-4 (PFI construction) and completion of the new 805 space MSCP at phase 5. The car park will be required for this use until the completion of phase 4 in 2017. At phase 5 it would be made redundant by the permanent MSCP. The car park is therefore considered a key and necessary requirement to proceedings for this interim period and is accepted in principle.

The requirement for a detailed Construction Management Strategy to support the proposal will be secured as discussed earlier in the outline element of this report.

Conclusion

It is therefore concluded that the principle of this redevelopment is broadly acceptable and the outline and full application put forward by the applicant is satisfactory in operational terms subject to application of mitigation measures and associated allocation of monies toward public realm/public transport improvements via legal agreement as outlined within this report. The acceptability of final design layouts will be subject to future detailed planning application submissions for each relevant phase to ensure conformity with the outline application, Local Development Framework Core Strategy objectives and National Planning Policy Framework.

5) IMPACTS ON BIODIVERSITY

Policy context

The NPPF states that the planning system should contribute to and enhance the natural environment (paragraph 109) recognising that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status (paragraph 113). The NPPF also applies the following principles to the determination of planning applications (paragraph 118):

- if significant harm cannot be avoided, adequately mitigated or (lastly) compensated, then permission should be refused;
- if an adverse effect on a Site of Special Scientific Interest (SSSI) is likely, either individually or in combination with other developments, the development should not normally be permitted;
- opportunities to incorporate biodiversity should be encouraged; and
- development resulting in the loss or deterioration of irreplaceable habitats should be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Policy 7.19.C of the London Plan requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity, wherever possible. Policy CS1 of the Harrow Core Strategy seeks to safeguard ecological interests and, wherever possible, provide for their enhancement. Saved policies EP26 and EP27 of the HUDP are concerned with species protection, and the conservation and enhancement of biodiversity. Policies DM27 and DM28 of the emerging DMP DPD seek the protection and enhancement respectively of biodiversity and access to nature.

When determining a planning application for a development which has an impact on European Protected Species, the Local Planning Authority (LPA) has a legal duty under the Conservation of Habitats and Species Regulations 2010 to take into account the three derogation tests contained within Article 16 the Habitats Directive 1992.

Ecological designations:

There are no international or national ecological designations on the RNOH site. However the Bentley Priory SSSI, a national statutory designation, is located approximately 1 mile to the west of the site. Local Nature Reserves (LNR) are a local statutory designation. The Stanmore Common LNR is located to the west of the site, whilst Stanmore Country Park LNR is located to the south of the site.

Sites of Importance for Nature Conservation (SINCs) are identified by the Greater London Authority and given effect locally through local plans. They are classified in accordance with their importance. The RNOH site is subject to two adopted SINCs and one proposed SINC:

- 1) Areas within the north and west of the site form part of the RNOH Grounds Site of Borough Grade 1 Importance for Nature Conservation (important from a borough perspective). This SBINC is designated due to the various habitats it supports, including ancient woodland, acid grassland and mature trees. Several plant species uncommon to London have also been recorded in the SBINC. A further SBINC (Wood Farm) is located immediately south of the site.

- 2) The southern edge of the RNOH site forms part of Pear Wood and Stanmore Country Park Site of Metropolitan Importance for Nature Conservation (important from a London perspective). This SMINC is designated due to the woodland, scrub, acid and neutral damp grass habitats it supports as well as several floral species uncommon to London which have been recorded here. The SMINC also supports important invertebrate fauna and an important colony of Southern Wood Ants, which is one of only two in Greater London.
- 3) An area of the site directly to the north forms part of the Watling Chase Community Forest planting site and environs a proposed Site of Local Importance for Nature Conservation (important from a local perspective). This pSLINC is an area of former agricultural land and landfill, now covered in moderately species-rich rough grassland with remnant hedgerows with standing dead wood. This area is an important resource for a wide range of vertebrate and invertebrate fauna.

Evidence

An Ecological Baseline Assessment (EBA) was undertaken during March to September 2012 to establish an up-to-date baseline against which to assess the likely impacts of the proposed development upon ecology. The ecological impacts of the proposal are addressed through an Ecological Impact Assessment (EclA), chapter 15 of the Environmental Statement (ES) and chapter 15 of the addendum to the Environmental Statement. The main impacts of the proposed development are discussed below.

Likely Impacts of the Proposed Development on Ecological Designations

§ *Impact on Bentley Priory SSSI*

No adverse effect on the Bentley Priory Site of SSSI is likely, taking into account the distance of the application site from the SSSI and the provision of public open space on the application site.

§ *Impact on Stanmore Common and Stanmore Country Park LNRs*

Stanmore Common and Stanmore Country Park LNRs are located outside of the site and are separated by physical barriers. As such, these areas would not be subject to any encroachment by the proposed development. However, the proposed residential use could increase use of the Country Park which may result in some potentially adverse effects such as trampling of flora, disturbance of wildlife, littering or damage to vegetation.

§ *Impact Pear Wood and Stanmore Country Park SMINC*

Only a small part of the SMINC is located within the Site itself, the majority lying to the south of Wood Lane. This would not be subject to direct effects of the proposed development as the built footprint would not encroach upon it. However, construction works would occur within close proximity of this ecological designation and this could result in indirect effects, including noise and lighting disturbance, and the potential for contamination of surface run-off resulting in pollution of wetland habitats. There is a notable population of Southern Wood Ant within the SMINC on the site and this is a likely receptor of such effects (discussed in detail further in this appraisal).

As discussed in section 4, two of the existing three Wood Lane accesses would be retained. There is a possibility that Wood Lane may be subject to some increases in traffic, although no widening of the road is proposed. The ES identifies an increased risk of road traffic accidents involving wildlife (associated with the SMINC), such as Badgers

and species of deer.

§ *Impact on RNOH Grounds SBINC*

Approximately 2.17ha of SBINC area would be lost as a result of the proposed masterplan. A loss of this SBINC was also proposed under the extant permission. In this case, the loss of habitats would comprise 0.52ha of woodland, 0.13ha of acid grassland, 1.41ha of grassland, tall ruderal and scrub and 0.11ha of hardstanding (a car park is currently present within the SBINC boundary to the south of the orchard). The ES advises that the retained parts of the SBINC are likely to be subject to effects during the operational phase, including noise and lighting disturbance, increases in recreational use, and the greater risk of contamination of surface run-off resulting in pollution of wetland habitats.

§ *Impact on Watling Chase Community Forest and proposed SLINC*

The ES does not address this proposed SLINC. However, Officers have given this consideration. The footprint of the proposed development would not encroach upon this proposed SLINC and there would not therefore be direct impact. Indirect impacts are not expected to be significant given its location at the northern part of the site.

Likely Impacts of the Proposed Development on Habitats and Species

§ *Habitats*

The submitted Ecological Baseline Assessment advises that habitats of ecological value including woodlands, scrub, orchards, ponds and scattered trees are generally situated towards the margins of the site. However, areas of acid grassland of moderate to high ecological value are located within the immediate surrounds of the hospital buildings and at the western part of the site. This is a relatively uncommon habitat, identified as a priority habitat under the UK, London and Harrow Biodiversity Action Plans, and listed under the RNOH Grounds SBINC citation (see above).

The Environmental Statement claims that the proposed development would result in relatively limited losses of habitats of ecological value (outside of the RNOH Grounds SBINC), since the footprint of the proposed development would be largely confined to the parts of the site already dominated by buildings and hardstanding. The notable exception is the loss of approximately 1.6ha of acid grassland areas.

§ *Bats*

The submitted Ecological Baseline Assessment advises that no breeding bat roosts were recorded on the site. However, two confirmed, and two possible, non-breeding bat roosts were identified within Eastgate House (EDZ), the old piggery (NAZ), the Zachery Merton Building (WDZ) and a building containing staff accommodation (WDZ). These support single or small numbers of, either Brown Long-eared, Common Pipistrelle or Soprano Pipistrelle bats, listed as European Protected Species (EPS). Eleven other buildings with a potential for roosting bats were also identified, as were a number of trees. Site survey work nevertheless recorded low levels of bat activity within the site. However, foraging and commuting opportunities for bats were identified in the woodland, semi-improved grassland and pond habitats within the site.

The Environmental Statement claims that the two confirmed and two possible non-breeding bat roosts would be lost due to demolition (the old piggery the Zachery Merton Building and a building containing staff accommodation) or renovation (Eastgate House). Whilst the majority of trees offering bat roosting potential would be retained, a small number of trees with low-medium potential for roosting bats would be lost.

The Ecological Baseline Assessment advises that bat activity was generally observed in the northern part of the site, which is proposed for open space. The proposed development footprint would be largely located within the vicinity of the existing hospital buildings, and this area was being found to support very limited bat foraging and commuting activity. The possible exception to this is the western part of the site, where a concentration of foraging activity was recorded.

The Environmental Statement claims the main issues likely to affect foraging and commuting bats would be lightspill, and disturbance associated with recreational use and residential areas (e.g. noise). The majority of the site which is proposed for built development and access creation (and hence likely to be subject to lighting), was found to support relatively low levels of bat activity. A moderate concentration of bats was noted within the western part of the site. Whilst the Warren Lane access at the south-western corner of the site would continue in use, no works (including lighting) are proposed along this road.

§ *Badgers*

The Ecological Baseline Assessment advises a single outlier badger sett was recorded within the northern part of the site and that a single badger latrine was recorded within woodland in the north of the site.

Due to its location approximately 60m from the proposed development footprint, the proposed works are unlikely to result in disturbance to badgers. However, construction works may pose a hazard, e.g. through the creation of trenches in which Badgers could become trapped. Direct effects on the outlier badger sett are not anticipated. However, areas of existing amenity grassland, which is potentially used by badgers for foraging, would be lost.

§ *Other mammals*

The UK BAP species hedgehog was recorded within the site. The site provides opportunities for a number of common mammal species, with evidence of rabbit, fox, grey squirrel and mole recorded during the surveys.

Construction works may pose a risk to mammal species, e.g. through the creation of trenches in which animals could become trapped or through disturbance associated with movement of vehicles and lighting. Areas of existing amenity grassland surrounding the main hospital, which is used by hedgehogs, would also be lost.

§ *Breeding Birds*

The woodlands, grassland, orchards, scrub, trees and ponds provide opportunities for breeding bird species. Survey work recorded common bird species within the site, including a small number of common UK BAP species. However, no protected or rare species were recorded.

The ES claims that the potential effects on birds during the construction phase would relate to direct loss of active nests and to disturbance to nesting birds. These effects are anticipated to be highly localised, particularly in relation to nest destruction. A large proportion of habitats of value to birds are generally located outside of the proposed development footprint and they are therefore likely to be largely unaffected. Some loss of potential nesting habitats (trees and buildings) would occur, as well as the loss of foraging habitat (amenity grassland).

§ *Amphibians*

Outgrown grassland, scrub and woodland habitats offer suitable terrestrial opportunities for amphibians. The survey work advises that there was no evidence of the presence of Great Crested Newt or any other newt species on site. A small number of the UK BAP species common toad were recorded within the large pond at the north of the site. The potential risk of pollution of the large pond is likely to pose potential hazards to the common toad, and other amphibians.

§ *Reptiles*

The outgrown grassland, scrub and woodland habitats offer suitable opportunities for common reptiles. A low population of Grass Snake was recorded at the north of the site which would be retained as open space. Substantial losses of reptile habitat are not therefore expected as a result of the proposed development. However, construction works within other areas of tall vegetation could result in a risk of injury. Whilst such effects are unlikely to be significant at a population level, injury or killing of individual reptiles would constitute an offence under the legislation relating to this species group

§ *Invertebrates*

Habitats within the site that are likely to support a range of common invertebrate species would be largely retained as part of the proposed development e.g. woodlands, high value trees, orchards, ponds and scrub.

As stated earlier, the 'nesting zone' of the Southern Wood Ant (located along Wood Lane) would not be affected by the footprint of the proposed development. However, the ES acknowledges that it would be particularly sensitive to the proposed upgrade of the existing access point which would serve the CDZ. The movement of vehicles during construction and operational phases would also give rise to potential effects, as would the risk of damage or disturbance from recreational disturbance once the development is complete.

Mitigation of impacts of proposed development

It is clear from the above that both the construction and the operational phases of the proposed development are likely to give rise to environmental effects upon designations, habitats and species. To address these impacts, mitigation measures are proposed within the ES and its addendum. Central to the proposed mitigation measures is the submitted Framework Ecological Management Plan, which provides a framework to establish and manage new and existing wildlife habitats at the site. The submitted Landscape Strategy is also central to the proposed mitigation measures as this establishes the key principles of how public open space could be successfully integrated within the scheme. It is anticipated that these documents would form the basis of a detailed Landscape and Ecological Management Plan which would be used to help consider the risk of specific impacts at reserved matters stage. The Construction Environmental Management Plan (CEMP) is also central to the proposed mitigation measures as this would set out commitments for environmental protection; details on measures of control and activities to minimise environmental impact; monitoring and record keeping requirements; and a commitment for review mechanisms. .

- Ecological Designations

There are no anticipated impacts upon Bentley Priory SSSI and mitigation measures are not therefore proposed.

The protection of Southern Wood Ants is central to the proposed mitigation measures relating to the Pear Wood and Stanmore Country Park SMINC and these measures are discussed in detail below. A number of representations have been received drawing attention to additional vehicular movements along Wood Lane and the impacts that this would have on wildlife crossing between the two parts of this SMINC (north and south of Wood Lane). The ES sets out a number of measures to address this. These include strategically placed wildlife reflectors, the provision of signage to warn road users of the potential for wildlife crossings and the introduction of traffic calming measure along Wood Lane (as discussed in section 4 above).

The creation and enhancement of habitats is a key aspect of the proposed mitigation measures relating to RNOH Grounds SBINC. It is specifically proposed to increase the extent and quality of woodland and grassland habitats as these are listed as key features of the RNOH Grounds SBINC. Although impacts in relation to the Watling Chase Community Forest and proposed SLINC are not likely, the proposed scheme of habitat creation and enhancement is likely to make a positive contribution to the ecological value of this.

The use of SUDS features is proposed to help control surface water runoff rates and to attenuate pollutants prior to discharge into the wider surface water network. Replacing the current, informal and casual management of the non operational areas of the site with deliberate long-term management of areas of open space areas is proposed.

The Environmental Statement suggests that full details of proposed mitigation measures would be detailed in the Construction Environmental Management Plan (CEMP). A summary of the main measures proposed is nevertheless provided below:

- Habitats and Species

§ *Habitats*

A substantial scheme of habitat creation and enhancement is proposed as part of the scheme and the ES claims that these measures would deliver significant benefits for biodiversity. This would focus on the enhancing retained habitats and creating new habitats, particularly along the proposed green corridors linking the NAZ to the Pear Wood and Stanmore Country Park. The delivery of new habitats is proposed by:

- § Creating and enhancing woodland areas which would increase opportunities for species such as bats, birds and invertebrates;
- § Planting new trees and shrubs, including species of wildlife value;
- § Creating new acid grassland which would be enhanced by scattered tree and shrub planting;
- § Creating new grassland to provide a foraging resource for birds, invertebrates and small mammal species;
- § Creating new grassland around the nesting zone for Southern Wood Ants;
- § Creating wetland features including wet swales and drainage ponds as part of the SUDS strategy.

The submitted Framework Ecological Management Plan provides a means to establish and manage new and existing wildlife habitats at the site and it is anticipated that this would form the basis of a detailed Ecological Management Plan.

A number of mitigation measures are proposed during the construction phase, including the erection of protective fencing around retained habitats of ecological value, damping down of potential sources of dust and management of drainage/surface water run-off. Full

details of these would be provided in a CEMP.

§ *Bats*

The demolition or renovation of buildings containing bat roosts has the potential to cause an offence under the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations). The ES proposes that further survey work is carried out immediately prior to the commencement of each phase of development onsite. This would confirm the level of use of the buildings by bats, and inform mitigation and licensing requirements. Importantly, this up-to-date information would inform an assessment of whether such 'roosts' would constitute a 'roosting site' under the legislation and if licensing would be required.

In order to minimise the risk to bats during demolition or renovation works, a number of safeguarding measures are proposed: (i) sensitive timing of works; (ii) pre-works inspections; (iii) soft stripping of features identified as having potential to support roosting bats; and (iv) briefings to construction staff. Similarly, safeguarding measures are also proposed during the felling of trees which have bat roosting potential. Importantly, if bats are encountered during tree felling, it is proposed to stop all works in respect of that tree and contact a suitably qualified ecologist for further advice. To mitigate for the loss of roosting habitats, replacement roosting opportunities are also proposed.

A detailed lighting scheme has not been provided with the outline application for the whole site. This could be provided at reserved matters stage and would incorporate measures to reduce the effects of lighting on bats, particularly species that are more sensitive to an increase in light levels. However, a scheme of lighting is proposed as part of the detailed element of the hybrid application and details (including a proposed layout) have been provided as part of the application. Proposed lighting would be limited to the areas of hardstanding (mainly comprising car parking areas and access roads) and the edge of woodland. The Environmental Statement claims areas of hardstanding are unlikely to support bat foraging and commuting activity. Given the adjacent woodland, Officers consider the matter is not quite so clear cut and following the advice of the Council's Biodiversity Officer, further information relating to the intensity of light spillage should be required by condition.

§ *Badgers*

A series of mitigation measures are proposed to minimise risk to badgers from general construction works across the site, including a proposed 20m cordon sanitaire around the badger set. The Council's Biodiversity Officer has advised that there may be a need to increase this distance if particularly disruptive work proposed (e.g. pile driving). This could be secured through a planning condition.

The proposed habitat creation and enhancement measures would increase foraging opportunities for badgers, particularly along the proposed green corridors. Mitigation measures outlined above in relation to bats would also reduce adverse effects on badgers associated with lightspill, as would the measures discussed in relation to the risk of road traffic accidents.

§ *Other mammals*

The ES states that mammal species are likely to benefit from the increased diversity and quality of habitats proposed for creation and enhancement, including UK BAP species such as hedgehog. Mitigation measures already outlined in relation to the movement of vehicles along Wood lane and lighting would serve to reduce adverse effects on

nocturnal mammal species.

§ *Breeding Birds*

It is proposed to mitigate against the potential loss of active nests by either undertaking clearance of potential bird nesting habitats (outside the breeding season) or preceding any clearance by an inspection by a professional ecologist. Any nests found would be cordoned off and protected until they ceased to be active. It is anticipated that the proposed habitat creation and enhancement measures would provide habitats for a range of bird species. In addition, it is proposed that nesting opportunities would be created through the provision of nest boxes across the site.

§ *Amphibians*

As discussed in section 11 relating to Land Contamination and Remediation, the Construction Environmental Management Plan would seek to prevent adverse impacts to ponds within the site. The proposed increase in the number and quality of waterbodies is expected to provide enhanced breeding habitat for amphibian species. In addition to this, it is anticipated that the implementation of a SUDS scheme would help to mitigate against the risk of pollution of ponds and ditches.

§ *Reptiles*

It is proposed to establish a restricted zone around the retained area of RNOH Grounds SBINC, which includes the habitat supporting Grass Snake at the Site. It is also proposed to implement a precautionary approach during vegetation clearance and ground preparation works. In the event that any reptiles are encountered, a suitably qualified ecologist would be contacted to advise on how to proceed. The ES advises that the proposed habitat creation and enhancement measures would increase the area of suitable reptile habitat within the site, particularly the establishment of new acid grassland, heathland areas and waterbodies.

§ *Invertebrates*

A number of representations have been received drawing attention to the retention of an access point at both sides of the Southern Wood Ant 'nesting zone' along Wood Lane. Revisions to the scheme in February 2013 have incorporated the closure of one of these access points. In recognition of the proximity of the 'nesting zone' to the CDZ entrance, the scheme proposes a mini-roundabout rather than a right turn lane as this would avoid widening of the road which impact upon the 'nesting zone'.

The erection of protective fencing around the Southern Wood Ant nesting zone is proposed during construction works to prevent encroachment. On completion of the development, the erection of permanent fencing is proposed around this 'nesting zone' to deter access to this area and safeguard the long-term future of the nests. It is expected that the establishment of heathland and provision of new acid grassland and scattered woodland areas to the north of the existing nesting zone would allow the expansion of the Southern Wood Ant population currently present at the site.

The ES expects that the proposed habitat creation and enhancement measures across the site would provide substantial benefits in terms of the diversity and quality of habitats, allowing for the site to support a greater diversity of invertebrate species.

§ *Exotic Invasive Plant Species*

A number of stands of Japanese Knotweed were recorded within the Site, along with the shrub *Rhododendron ponticum*, whilst a large amount of amenity planting is also present

which may support Cotoneaster species. These species are listed under schedule 9 Part II of the Wildlife and Countryside Act 1981 as amended, making it an offence to cause these plants to grow in the wild.

The majority of the Japanese Knotweed stands recorded within the Site are already subject to chemical treatment. However, a small number of additional stands were recorded during the course of the survey work that do not appear to be part of the treatment programme. As such, there is the potential to cause the spread of the invasive species both Japanese Knotweed and Rhododendron through movements of soil contaminated with this species.

It is proposed to incorporate additional stands of Japanese Knotweed into the existing Japanese Knotweed strategy before any works commence in the vicinity of affected areas to ensure that the stands are treated, or would be relocated to treatment piles, through a 'dig and dump' exercise, before any groundworks commence. Measures would also be put in place to ensure the appropriate removal and disposal of Rhododendron (and any other invasive species) from the Site. These measures would be detailed in the CEMP.

Consideration of Article 16 the Habitats Directive 1992

The demolition or renovation of buildings containing bat roosts has the potential to affect Brown Long-eared, Common Pipistrelle and Soprano Pipistrelle bats, listed as European Protected Species (EPS). The Local Planning Authority has a legal duty under the Conservation of Habitats and Species Regulations 2010 in relation to EPS, namely that when determining a planning application for a development which would have an impact on EPS, the LPA must take into account the three derogation tests contained within Article 16 the Habitats Directive 1992 at the planning stage. The applicant has considered each of these three derogation tests as part of their submission and it is necessary for the LPA to also consider how the proposal would meet each of these three tests.

1) Imperative Reasons of Overriding Public Interest

This report considers if the benefits of the development would sufficiently outweigh any harm resulting from inappropriate development in the Green Belt. The conclusions are equally pertinent to the particular test contained within Article 16 the Habitats Directive 1992. The earlier consideration of this question concluded that there were a compelling set of circumstances, relating to clinical, economic and physical regeneration and use of the site that amounted to very special circumstances. Set against the test within the Directive, and with the advice from the Councils ecologist on the severity of the impacts identified, Officers consider that there are imperative reasons of overriding public interest in this case.

2) No Satisfactory Alternative

Chapter 3 of the Environmental Statement relating to Alternatives and Design Evolution considers four alternative options to the current proposal:

- (i) The 'do nothing' alternative where the development is not progressed:
As set out in the paragraph above, the existing facilities are in poor physical condition. They do not meet the current and future operational demands of service provision and patient care. It is clear that the Trust cannot afford to delay development of a new hospital for much longer. This scenario has therefore been discounted.

- (ii) Alternative locations for the proposed development:
The submitted ES advises that the Trust do not own any other land in the Borough. It further advises that the Trust does not have access to funds that would cover the cost of acquiring new land and developing the facilities. On this basis, this alternative is not an option.
- (iii) Alternative uses for the site:
The primary objective of the proposal is to improve the hospital facilities in order to adequately support clinical need, patient expectations and care requirements. This objective is supported by the Development Plan, which recognises that the financial implications of delivering a new hospital are likely to require a component of 'enabling' development to subsidise the cost of the delivering a new hospital. Alternative uses (offices and hotel uses) have been explored but would not provide sufficient funds to enable the hospital. Officers are also aware of previous interest by a Free School promoter which has now lapsed on the basis that it would not have generated sufficient confidence around the capital receipt to meet the PFI timetable. On this basis, these alternative uses do not offer a viable option. The hybrid planning application therefore proposes 'enabling' residential development to create necessary revenue to cross-subsidise the delivery of a new hospital.
- (iv) Alternative design/layout for the proposed development in the context of the design evolution:
The site is located in the Green Belt and is subject to a Tree Preservation Order. Part of it is of Borough Grade 1 Importance for Nature Conservation (SBINC) and part of it is of Metropolitan Importance for Nature Conservation (SMINC) within the adopted Harrow Biodiversity Action Plan. There are two Scheduled Ancient Monuments and a locally listed building on the site. As such, the site is subject to a number of planning constraints. The Royal National Orthopaedic Hospital, NHS Trust entered into a Planning Performance Agreement (PPA) in July 2012 with the Council to formalise the pre-application stage of engagement in respect of the proposals. As per the submitted Design and Access Statement, the layout of the proposal has evolved throughout this PPA, with discussions taking place in relation to a number of alternative layouts.

3) Favourable Conservation Status of the Species Must be Maintained

Two confirmed and two possible non-breeding bat roosts which support single or small numbers of, either Brown Long-eared, Common Pipistrelle or Soprano Pipistrelle bats have been located within buildings proposed for demolition or renovation. Using guidance set out within Natural England's Bat Mitigation Guidelines (2004), these are considered to be of low conservation significance as they are transitory in nature and unlikely to be of high value to bats in the local area. No breeding roosts have been recorded. Therefore these roosts are unlikely to be critical in terms of Favourable Conservation Status of the bat population using the site. The loss of these roosts is unlikely to be significant at local level.

Nevertheless, a suite of safeguards, mitigation and enhancement measures are also proposed in relation to these roosts to ensure Favourable Conservation Status of bat species is maintained or enhanced. To mitigate for the loss of roosting habitat under the development, replacement roosting opportunities are proposed. Opportunities will also be explored for the provision of more extensive roosting areas within the roof spaces of new hospital buildings or residential buildings, providing suitable roosting conditions for

species such as Brown Long-eared bat. Given the low conservation significance of the roosts present within the site, it is considered that such provision will provide equal or greater roosting opportunities within the site than are currently present. Habitat creation and enhancement measures are proposed which should provide substantial benefits to bats. Notably, enhancement of existing woodlands, establishment of new areas of species-rich grassland, new tree and shrub planting and new wetland habitat creation will provide habitats likely to be rich in invertebrates, creating increased foraging opportunities for bats within the site. Regular monitoring of bat populations on site would take place during all stages of the development. Feedback from which will be used to minimise any disruption and to hone the management undertaken with regards to populations of bats.

Subject to conditions, the lighting design for the development would embrace measures to minimise the adverse effects of lighting on bats (particularly regarding light sensitive species such as *Myotis*).

Following implementation of these measures, it is considered that the populations of bats currently present within the site will be fully safeguarded. Furthermore, the creation of new areas of habitat under sympathetic management regimes and new roosting opportunities should allow the expansion of the existing populations and ensure the long-term Favourable Conservation Status of bats within the site and the local area.

Conclusion:

The ecological baseline position of the site and the key potential impacts of the proposed development (from both construction and operational phases) have been considered. Representations received from nature conservation interests equally highlight a number of specific concerns with the potential ecological impacts arising from the development. Officers have previously acknowledged the importance of the ecological interests on and adjacent to the site and through the pre-application stage and ES scoping, have sought to ensure that these are respected through the masterplan and site layout, and in accordance with regulations.

There is likely to be no adverse effect on the Bentley Priory Site of SSSI, and there is likely to be no significant harm to Stanmore Common and Stanmore Country Park LNRs. The likelihood of an increased traffic on Wood Lane poses a risk to wildlife associated with Pear Wood and Stanmore Country Park SMINC (particularly the Southern Wood Ant) which will in part be mitigated by reduced traffic speeds associated with the proposed traffic calming. There would be permanent losses of habitat at the margins of the RNOH Grounds SBINC and temporary indirect effects associated with construction.

The proposal would have a direct impact upon bats as a result of the loss of two confirmed and two possible non-breeding bat roosts (although these roosts are not considered to be critical – see section on consideration of Article 16 (above), as well as some trees with potential for roosting bats. There would also be some indirect impact associated with increased lighting and activity, particularly at the periphery of the site.

The development is unlikely to directly affect badger habitats, although there would be loss of foraging grassland and increased risk to badgers associated with traffic and construction. Similarly there would be some loss of habitat to common mammal species and risks associated with traffic and construction. Breeding birds would be subject to some loss of habitat and foraging grassland, as well as disturbance during construction. There would be no significant harm to amphibians or reptiles. No significant impact upon

common invertebrate species is likely, but a species of local biodiversity importance (the Southern Wood Ant) would be at risk of temporary indirect impacts associated with construction and, more permanently, associated with operational and recreational disturbance.

In all instances, mitigation measures are proposed. These are set out in the ES and key elements of the mitigation are referenced above. The mitigation is considered by Officers to be realistic and capable of implementation. The creation and enhancement of habitats is a key aspect of these mitigation measures, as this is likely to enhance the overall biodiversity of the site and to improve the significance of the ecological designations.

In relation to protected species, Natural England have advised that on the basis of the information available, they are satisfied that the mitigation proposals, if implemented, are sufficient to avoid adverse impacts on the local population of bats and therefore avoid affecting favourable conservation status. Natural England have further advised that permission may be granted subject to appropriate conditions including a detailed mitigation and monitoring strategy for bats.

The Council's Ecologist, along with third party conservation groups have raised concerns in relation to the CDZ access on Wood Lane, as this may lead to an increase in traffic and an increase in accidents involving wildlife. These concerns are noted. However, given the proposal to close one Wood Lane access along with the proposed mitigation measures to reduce speed along this already heavily-trafficked highway, it is considered on balance that the scheme would not give rise to undue impacts to wildlife crossing Wood Lane. The Council's Ecologist raises no objections to any other aspect of the proposed development, subject to imposition of conditions relating to habitat enhancement, creation and management and appropriate mitigation for protected species. The GLA are satisfied with the information that has been provided, subject to condition.

It is acknowledged that interested parties have objected to the proposal for a number of reasons relating to biodiversity, including the adequacy of the surveys that have been undertaken. The scope of the surveys was agreed with Harrow Council and Natural England as part of the Environmental Statement scoping opinion. The Council's Ecologist is satisfied that all surveys have been carried out in accordance with relevant standard guidance and has reviewed the findings of the surveys. Officers have considered these findings in assessing the merits of the application.

The proposal provides opportunities for the establishment of new habitats, the enhancement of existing habitats, and the appropriate management of the sites biodiversity. Biodiversity across the site is not currently actively managed and Officers consider that the proposal is therefore capable of resulting in an overall improvement, when compared to the existing situation. The proposal would also enable the effective control of invasive plant species, including Japanese Knotweed.

In summary, it is considered that the harmful impacts identified could be overcome by the mitigation measures proposed and secured by conditions and the obligations of a S.106 agreement. Officers consider that the proposal would provide a benefit to the biodiversity of the site as a whole. On this basis, it is considered that the proposed benefits would outweigh the harm caused to the identified ecological designations, habitats and species thereby complying with the NPPF, policy 7.19.C of the London Plan, policy CS1 of the Harrow Core Strategy and saved policies EP26 and EP27 of the HUDP and the

appropriate Directive (above).

6) THE PROVISION OF HEALTHCARE

The published Health and Social Care Bill formalises the Government's clear vision in relation to the important role of Local authorities in the delivery of healthcare. This Bill is crucial to the Government's vision to modernise the NHS. It represents a major restructuring, not just of healthcare services, but also of Councils' responsibilities in relation to health improvement and the coordination of health and social care. Subject to the Health and Social Care Bill becoming law (by April 2013), Primary Care Trusts will be abolished and the majority of public health functions will be transferred to local authorities. Integral to this is the duty for local authorities to promote the health of their population and commission specific public health services.

Policy 3.17 of The London Plan 2011 supports the provision of high quality health and social care facilities. Saved UDP policy C8 seeks to ensure sufficient appropriate health and social care provision in the borough and supports the provision of new or extensions to existing facilities, provided that certain criteria are met. This policy makes specific reference to the potential development of the RNOH site. Draft Policy 57 of the Development Management Policies DPD supports proposals to refurbish and re-use existing community facilities (including primary healthcare facilities).

The RNOH, Stanmore is the largest orthopaedic hospital in the UK, providing a comprehensive range of neuro-musculoskeletal services unique to the NHS. The hospital treats in excess of 100,000 outpatients and undertakes over 11,000 essential surgical procedures per year. It also trains over 20% of the UK's orthopaedic consultants. It is clear from section 1 of this appraisal that securing healthcare facilities at the RNOH is a local policy objective. This policy objective is reflective of the importance of the site in strategic planning terms; the national significance of the hospital as a leading medical institution and the importance of the site locally as a major employer. It is the urgent need to improve the existing healthcare facilities and the associated delivery of appropriate patient care that lies at the heart of the current proposal. The application proposes the provision of an exemplary new modern hospital in order to deliver high quality care. Failure to redevelop the hospital would threaten the hospital's future role in delivering orthopaedic care.

The proposals are considered to satisfy the requirements of the development plan in respect of the delivery of healthcare.

7) HOUSING PROVISION AND AFFORDABLE HOUSING

Housing Mix

London Plan policy 3.9, Core Strategy policy CS1.I and saved UDP policy H7 require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.

Core Strategy policy CS1.H seeks to allocate sufficient previously developed land to deliver at least 6,050 net additional homes between 2009 and 2026. Core Strategy Policy CS7.J anticipates that the RNOH site will contribute towards this delivery of homes, as the principle of enabling residential development underpins the extant planning

permission. It is on the basis of this extant permission that the draft Site Allocations DPD anticipates that the site will deliver 127 new homes. As per the extant scheme, this hybrid planning application proposes ‘enabling’ residential development to create necessary revenue to cross-subsidise the delivery of a new hospital. The current proposal would contribute 347 new residential units to the Borough’s housing supply, in addition to the 9 existing staff units which would be retained within Orchard Court. The applicant is not seeking consent for a specific mix of residential units on the site, although at this stage an indicative mix has been put forward. The table below shows this indicative mix of housing and includes the retained Orchard Court:

WDZ	1 Bed	2 Bed	3 Bed	4 Bed	5+ Bed	Total
Flats (market)	4	18	16	0	0	38
Houses	0	0	13	29	12	54
EDZ						
1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	Total	
Flats(market)	59	100	48	3	0	210
Houses(market)	0	0	0	9	0	9
Staff (including Orchard Court)	9	23	13	0	0	45
Total	72	141	90	41	12	356

Discussions with the GLA following their stage 1 response have focused around the mechanism for securing an appropriate mix through the reserved matters stages. Officers and the GLA consider that this should be secured by way of a condition aligned to each phases. At this stage, and following discussion with the Housing Directorate, this indicative housing mix is considered to be acceptable and the proposal would deliver a wide choice of housing in line with the requirements of paragraph 50 of the NPPF.

Housing Density

The submitted Parameter Plans set out the maximum quantum of residential units within each of the proposed residential development zones.

Zone	Site Area	Maximum no. of units	Units per ha.
WDZ	7.4	92	12.4
EDZ	5.3	264 (including Orchard Court)	49.8

Table 3.2 of the London Plan provides density ranges for central, urban and suburban settings but does not provide density ranges for rural settings, such as the application site. To address this and other issues that the London Plan density matrix presents, the Mayor has adopted the Housing SPG (2012). This seeks to “optimise” rather than simply maximise housing potential. It recognises that density is only one among a much wider range of amenity, transport and social policies to manage development in ways to secure sufficient numbers and types of home in a high quality environment while respecting local character.

It is clear from the above table that there is a considerable difference in the proposed densities for each of the residential zones. Higher density residential development would be located in the EDZ, and a lower density is proposed in the WDZ. Given their location and the difference in the levels of public transport accessibility, this is considered to be an appropriate design response. Having regard to the sites low PTAL rating, its rural

character and its Green Belt location and function, it is considered that the site would not be suitable for a higher density of development than currently proposed.

Affordable Housing

London Plan policy 3.12 requires Local Planning Authorities to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. Core Strategy policy CS1J states that 'the Council will aim for a Borough-wide affordable housing target of 40% of the housing numbers delivered from all sources of supply across the Borough'. The viability appraisal prepared by the applicants argues that, because of the specific and unique purpose of the housing proposed in this case, the application will not be able to meet the requirement for a range of affordable housing tenures and units. Instead, the application proposes to provide 10% of the housing units (across the site) as staff/key worker accommodation.

As per the extant scheme, this is an 'enabling' proposal. For an application for enabling development to be successful, the quantum of development proposed should be no more than is necessary to secure the benefit. In the first instance, the viability report along with a supporting letter from Trust, concludes that all receipts from the sale of land in the WDZ and EDZ are essential to enable the delivery of the hospital. Receipts from the sale of the WDZ are required to help fund the second phase of the hospital's development; the Private Finance Initiative (PFI) element. Receipts from the EDZ will help secure later stages of the hospitals delivery. Although it is acknowledged that funding requirements are less clear for latter phases of the hospitals redevelopment, the documentation does make clear that the Trust cannot use these receipts for purposes other than investment in the application site. Crucially, these receipts in themselves would not secure any one phase of the proposed hospital and Trust borrowings together with PFI procurement would also be required.

In the second instance, this viability report highlights a range of affordable housing contributions that have been tested across the site. It concludes that the 10% affordable housing offer is justified as the provision of further affordable housing on the site would render the scheme unviable and undeliverable.

In their response at Stage 2, the GLA have asked for an independent appraisal of the viability assessment submitted. In clarifying the extent of such an appraisal – given that the financial modelling as part of the PFI is the subject of scrutiny by Treasury Officers it is agreed that such an assessment focus's on the residential sales values, and their validation for the purposes of the report's conclusions. Harrow Council officers are broadly satisfied that the research used to inform these values applied appropriate evidence from sales at nearby sites to determine the values. Nevertheless, in response to the challenge from the GLA, further evidence is being sought from the applicants, and the Councils own property team. The conclusions of this investigation will be reported to the meeting.

Staff Accommodation

London Plan policy 3.8 requires developments to provide a range of housing sizes and types to encourage a full range of housing choice. London Plan policy 3.14 states that the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need will not be supported unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

All of the proposed affordable housing would comprise of intermediary housing units (staff/key worker units) and would equate to 36 units. In addition to this, 9 of the existing staff units would be retained on site. These 45 units would accommodate up to 82 members of staff. There are 65 staff units on the site at present, containing 110 bed spaces. The proposal would therefore result in a net loss of 20 units equating to 28 members of staff.

As part of the proposed redevelopment, the Trust has assessed the need, quantum and mix for modern staff facilities. In doing so, they have considered that many of the existing units are in need of repair and are not fit for purpose, and also that 12 of the existing units are vacant. The reduced provision of staff accommodation is deemed by the Trust to be appropriate for current and future levels of staff. On this basis, the GLA and Council officers are prepared to accept the modest loss of staff accommodation can be accepted in this instance.

It is proposed that the intermediate units will be managed by the Trust or a registered provider, and will be available to staff at less than market rent. The Housing Department wish to see further detailed proposals regarding nomination rights, housing management proposals and rents proposed by the Trust, and wish to see these variables tied to the S106 agreement to ensure long term affordability of the units for future occupiers

8) RESIDENTIAL AMENITY

Policy Context

Policy 7.6.B of The London Plan (2011) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. Saved policy D5 of the Harrow Unitary Development Plan similarly seeks to ensure that the amenities and privacy of neighbouring occupiers is not adversely affect by development. Policy 1 of the emerging Development Management Policies DPD broadly reflects the thrust of saved policies D4 and D5 of the HUDP (2004).

Amenities of Neighbouring Occupiers

There are few residential properties immediately adjacent to the application site. Buildings within the proposed development would generally be sited away from the boundaries of these neighbouring residential properties. On the basis of this and the limited heights of the buildings, it is therefore considered that the proposed development would not be overbearing to the occupiers of neighbouring dwellings, nor would the buildings result in unacceptable loss of light or outlook. Acceptable fenestration arrangements could be devised to ensure that the proposed residential units would not overlook neighbouring properties. The proposal would therefore ensure that an acceptable impact on the amenities of neighbouring residential occupiers would be provided, in accordance with the requirements of saved UDP policy D5 and the Residential Design Guide SPD.

It is acknowledged in section 4 above that there would be an uplift in traffic movements in the area mainly as a result of the proposed residential element of the scheme. An objection has been received which raises concerns over the impact of these additional traffic movements on neighbouring amenity, particularly along Wood Lane. It is apparent that Wood Lane is frequently being used as a 'rat run' to avoid Stanmore and London

Road, and this is an issue which was raised in response to the consultation process. This scenario is likely to continue even if the development does not go ahead. The application envisages that the proposed mini-roundabout at the CDZ entrance would provide a form of traffic calming to ensure that the effects of additional traffic on the safety of wildlife, pedestrians and other road users is optimised. In terms of the movements of construction vehicles, it is considered that the full Construction Environmental Management Plan, required by condition would ensure that the future demolition and construction works would not unduly impact on neighbouring amenity in terms of traffic movements, noise and/or vibration.

A further objection has been received raised concerns in relation to the proximity of site accesses to residential properties. However, as discussed in section 4, existing accesses would remain in use and there is no proposal for new accesses to the site.

It is therefore considered that the proposed development would not compromise the amenity or safety of neighbouring occupiers.

Living Conditions of Future Occupiers

As the proposal is submitted in outline, no detailed layout plans of the proposed residential buildings have been submitted. There are however illustrative details in the Design Guidelines in relation to housing layout and typologies, which give an indication of how the site could be developed. On the basis of the information provided, Officers are satisfied that the proposed houses and flats could be designed to comply with the space standards set out in the London Housing Design Guide and the Residential Design Guide SPD. Acceptable external amenity space could also be provided and, subject to further consideration of this issue at reserved matters stage, the proposal is considered to be acceptable in this regard. Given the GLA's concerns, expressed at Stage 1, Officers consider that a condition requiring the submission of a statement with each relevant application concerning the layout and design of the future units and explaining how the Mayors requirements are being addressed, will help to ensure that the objectives of the development plan with regard to the quality of future homes, are realised.

Noise and Air Quality

Detailed consideration of the impact of the development on noise and vibration and air quality is undertaken in appraisal section 12, below.

Children's Play Space

London Plan policy 3.6 requires development proposals that include housing to make provision for play and informal recreation, based on the expected child population of the scheme and an assessment of future needs and this is re-inforced by Core Strategy policy CS1. The Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation' (2012) contains more detailed guidance, including a benchmark of 10sqm of usable playspace per child. However, the Council's Open Space, Sport and Recreation Study sets the requirement for Harrow at 4sqm of usable playspace per child.

It is anticipated that there will be approximately 197 children within the proposed development. This calculation is based on an indicative housing mix. The applicant is proposing to provide 1,100sq.m of play space (600sq.m for the EDZ and 500sq.m for the WDZ). This would represent an over-provision of 312 sqm when considered against the Council's requirements. On the basis of this, along with the proposal to provide 19.2ha of open space, the proposed provision of children's play space would therefore meet the expected and future needs of the development and is considered to be acceptable.

Detailed designs of the play spaces are not before the Council at this time, although an appropriate condition would ensure that future reserved matters submissions include adequate detail. A discussion with the GLA has confirmed that they accept this approach.

9) IMPACT ON HERITAGE ASSETS

Paragraph 129 of the NPPF states that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise'. Policy CS1 of the Core Strategy states that 'proposals that would harm the significance of heritage assets including their setting will be resisted. The enhancement of heritage assets will be supported and encouraged'.

The applicant has submitted a Heritage Statement in support of the application, which sets out the history of the sites development and addresses the impacts of the current proposal on designated heritage assets within the site and its surrounds. This is also addressed in chapter 12 of both the ES and the ES addendum. These documents consider the significance of the identified heritage assets and their settings. The documents also consider the potential physical and non-physical impacts of the proposed development and proposed mitigation measures. This information has been considered and the key findings are addressed below.

The following designated heritage assets are within the site:

- § Locally Listed Buildings: Eastgate House (original hospital building) and roadside walls
- § Little Common Conservation Area lies immediately to the south-west of the site and slightly extends into the site.
- § The Brockley Hill Romano British pottery and settlement Scheduled Ancient Monument is located at the easternmost part of the site. There are no above ground remains.
- § An 18th Century obelisk Scheduled Ancient Monument is located towards the western part of the site.

Eastgate House, the associated lodge buildings and roadside walls are the earliest buildings which can be associated with the hospital on the site. Unlike the extant scheme, this application seeks to retain Eastgate House. This proposal is welcomed not only from a conservation viewpoint but also from a place making viewpoint, as this building provides a reminder of the origins of the hospital. The lodge buildings would also be retained. In order to carry out improvements at the Wood Lane / Brockley Hill junction, it is necessary to demolish the roadside wall along Wood Lane. Little remains of the original roadside wall and its heritage significance is its association to Eastgate House rather than the significance of this asset in itself. On the basis of this and on the basis of the fall back position (demolition of Eastgate House), it is considered that the proposed removal of this wall can be accepted. Importantly, the roadside wall along Brockley Hill would be retained. The Councils Conservation Officer has advised that there are no objections to the proposal to remove the roadside wall along Wood Lane.

The Little Common Conservation Area lies immediately to the south-west of the site and slightly extends into the site. This part of the site and the northern part of the Conservation area are mainly comprised of woodland and trees. In January 2013, planning permission was granted for the laying of services, associated excavation works

and for tree removal within the RNOH site and close to this Conservation Area. However, a buffer of woodland and trees has been retained and this application does not propose to remove this buffer. A green corridor would be created between the built development in the WDZ and the Conservation Area, thereby enhancing the setting of the Conservation Area. The proposed first phase of the redevelopment (the Princess Eugenie House and Graham Hill Unit) would be the closest building to the Conservation Area. It is considered that the proposed height of this building (no higher than existing buildings with the central part of the site), coupled with the separation distance from the Conservation Area, would ensure that an acceptable relationship could be maintained. The detailed design of this building, the use of materials and landscaping would be considered further at reserved matters stage. Although the realigned western service road would be sited closer to the Conservation Area than the current situation, the aforementioned trees and woodland would buffer any undue impacts. The Councils Conservation Officer has advised that the proposal would preserve the Conservation Area and its setting given the dense screening already in place.

The proposed built footprint would not encroach on the Brockley Hill Romano British pottery and settlement Scheduled Ancient Monument. As it is below ground, English Heritage have advised that its setting would not be adversely affected by the current proposal. English Heritage have however advised that new trees should not be planted at this particular part of the site, and that there is a need for future landscaping to respect the extent of the monument. English Heritage have further suggested conditions requiring the implementation of a programme of archaeological mitigation and standing building recording and these are set out at the end of this report.

The application proposes that the built footprint and access roads in close proximity to the 18th Century obelisk would be sited in approximately the same location as the existing situation. Its setting would however be changed as a result of the current proposal. English Heritage recognise that the setting of the obelisk is already somewhat compromised by the trees in close proximity and have not objected to this change of setting. However, they have advised that it would be helpful if the trees could be managed and thinned, to allow better access and appreciation of it, as the obelisk. The applicant proposes to remove the trees in immediate proximity of the obelisk and it is considered that this would address the concerns of English Heritage.

There are also a number of designated heritage assets in the area surrounding the site, including:

- § Linear Works within Pear Wood Scheduled Ancient Monument;
- § A number of Grade II Listed Buildings, the nearest of which are Brockley Grange, Brockley Hill Farmhouse, Brockley Hill timber clad barn and an 18th century grotto
- § A number of Locally Listed Buildings including the hospital lodge buildings
- § Brockley Hill Archaeological Priority Area

With the exception of Brockley Hill Farmhouse and barn, the ES claims that the impacts of the proposed redevelopment on each of these heritage assets would be negligible. The Councils Conservation Officer agrees with this conclusion, and has advised that the impacts on Brockley Hill Farmhouse and barn relate to the wider views to the south-west as it is possible that the new development would be partially visible. However, this needs to be balanced against the proposal to remove the untidy sprawl of buildings across the site, which would open up views. The Councils Conservation Officer raises no objection to this 'impact'.

Subject to further consideration of design and layout at reserved matters stage, the proposal is considered to meet development plan policy objectives aimed at safeguarding national heritage assets.

10) FLOOD RISK AND DRAINAGE

Chapter 14 of the ES addresses Water Resources, Drainage and Flood Risk, and a Flood Risk Assessment (FRA) accompanies the application documents. The application site is located within flood zone 1, and is therefore not at high risk of flooding. The ES claims that there could be some minor adverse effects caused by site preparation, the enabling works and the establishment of the site offices and contractors compound, whilst moderate adverse effects could result from substructure works and the effects on water resources. In terms of the operational development, the ES claims that effects on the existing surface water system are considered to be moderate adverse and the effect on water resources is considered to be minor adverse. In order to address these impacts, a number of mitigation measures are proposed. In particular, a surface water management system, including an attenuation pond and other SuDs features is proposed.

The Environment Agency (EA) and the Council's Drainage Engineer have confirmed that the submitted information is satisfactory, subject to a number of conditions. Subject to these conditions, the proposal would not increase the risk of flooding on the site or elsewhere and the proposals would therefore accord with the expectations for consideration of flood risk contained within the NPPF, and the requirements of Core Strategy policy CS1 and saved UDP policy EP12.

In terms of waste water disposal, Thames Water has carried out initial investigations and identified an inability of the existing waste water infrastructure to accommodate the needs of the proposal. In terms of mitigation, the ES claims that Thames Water advised, through a pre-development enquiry application, that the most appropriate way to deal with this issue is to impose planning conditions enabling the matter to be considered at reserved matters stage, when the impact on demand is more tangible. Thames Water have commented on the current Planning application and suggested that a 'grampian style' condition is attached to any Planning approval. This would require a drainage strategy to be submitted prior to the commencement of development. No discharge of foul or surface water from the site would be accepted into the public system until the drainage works referred to in the approved strategy have been completed. The Councils Drainage department and the Environment Agency have advised that they too are satisfied with this approach, subject to each Reserved Matters application adhering to this strategy.

Subject to this condition, the proposal would not lead to sewage flooding on the site or elsewhere and the proposals would therefore accord with the expectations for consideration of flood risk contained within the NPPF, and the requirements of Core Strategy policy CS1.X and saved UDP policy EP14.

11) LAND CONTAMINATION AND REMEDIATION

The NPPF (paragraph 121) requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented. This reflects the requirements of saved UDP policy EP22, which

also requires an investigation of the hazards posed and appropriate.

Chapter 13 of the ES advises that a preliminary ground contamination risk assessment has been undertaken as part of a Phase 1 Ground Conditions Report to determine the presence of possible pollutants and any significant risk to receptors such as human health, controlled waters, ecology and properties. Whilst off-site hazard sources have not been identified, a number of potential on-site hazard sources have been identified as possible pollutants and are set out within the ES. These include activities undertaken at the hospital and a historical landfill site situated in the northern part of the site. This takes the form of a raised plateau with steep slopes on all sides. The ES advises that this was a Registered site which was authorised to accept inert waste, but prohibited from accepting clinical, notifiable, poisonous, noxious, polluting, sludge and liquid and special wastes. The licence as a Registered Site lapsed in June 1989, although the last input date was December 1992.

The following construction activities have been identified as being likely to affect ground conditions; site preparation, enabling works, site offices, and welfare, contractors compound and substructure. Human health, groundwater and property have been identified as possible receptors. A number of mitigation measures are proposed within the ES.

Whilst the initial risk assessment has indicated that there will be no significant risk to the identified receptors, further investigations are required to target areas of potential concern. The risk assessment would then need to be reconsidered when the findings and results are available. A further geo-environmental investigation would also be required to provide the information necessary to progress the initial and more detailed foundation design. These assessments would inform a Phase 2 Generic Quantitative and/or Detailed Quantitative Assessment of the identified potential risks. Crucially, this would determine if any remediation and / or gas protection measures are required to protect end users, construction and maintenance workers, the surrounding soil and groundwater environment and the buildings that will form the development.

Representations have been received raising concerns in relation to contamination and the level of information that has been provided. The EA and the Council's Environmental Health department have reviewed the submitted information and consider it to be satisfactory, subject to a number of conditions. Subject to compliance with these conditions, it is considered that the site can be made safe for future end users (residents, employees and the general public) and the proposal is therefore considered to be acceptable in this regard.

12) SUSTAINABILITY AND CLIMATE CHANGE MITIGATION (INCLUDING NOISE AND ODOUR)

Energy Strategy

Paragraphs 96-98 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 5 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. Specifically, policy 5.2 sets out an energy hierarchy for assessing applications, as set out below:

- 1) *Be lean: use less energy*
- 2) *Be clean: supply energy efficiently*

3) *Be green: use renewable energy*

Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction, whilst policies 5.9-5.15 support climate change adaptation measures.

The applicant has submitted an Energy Statement, which details the likely energy demands of the proposed development and proposed a strategy to increase energy efficiency. A Sustainability Statement has also been submitted, which describes the sustainability principles of the proposed development and measures that would be incorporated to ensure high levels of performance and long-term viability.

The applicant proposes a range of passive design features and demand reduction measures to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. However, details of savings in regulated carbon dioxide emissions in tonnes per annum resulting from energy efficiency measures have not been provided. Given that this is (in the main) an outline application, this is understandable. However, detailed information is required by condition for each phase of the development.

London Plan which requires major development proposals to select energy systems in accordance with the hierarchy set out in Policy 5.6:

- 1) Connection to existing heating or cooling networks;
- 2) Site wide CHP network;
- 3) Communal heating and cooling

The applicant has carried out an investigation and concluded that there are no existing or planned district heating networks (DHN) within the vicinity of the proposed development. In the absence of this, and in accordance with the above hierarchy, London Plan policy 5.6 requires the installation of a site wide CHP network. The applicant is not proposing this. It is noted that the GLA have sought a site wide CHP network or consideration of the provision of communal heating and cooling to the hospital buildings and residential blocks. However, the proposal is for mainly detached residential units in the WDZ and this would be an enabling part of the scheme which requires an upfront 'bullet payment'. LBH Officers have discussed these considerations with GLA Officers, and both recognise that whilst a site wide CHP may not be feasible in this instance, there is a clear opportunity for the CDZ and EDZ to connect to a CHP. In light of this, Officers suggest an appropriate condition to secure a revised energy strategy for the site.

In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

Urban Greening

London Plan policy 5.10 promotes urban greening measures, such as green infrastructure and public realm planting to contribute to the adaptation to, and reduction of, the effects of climate change. London Plan policy 5.11 requires major development proposals to be designed to include roof, wall and site planting where feasible.

The proposed provision of a Green Corridors through the site is supported in this regard, as is the Northern Amenity Area. In addition to this the revised Design Guidelines advise

that green' or 'brown' roofs may be provided within each of the proposed development zones, where feasible and appropriate.

Sustainable Urban Drainage

London Plan policy 5.13 seeks to ensure that development utilises sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

The submitted Flood Risk Assessment (FRA) seeks to ensure that properties within the development would be protected from flooding in a sustainable manner, including the provision of SUDS techniques to supplement on-site attenuation facilities. The Environment Agency support the implementation of SUDS as part of the scheme and recommend a condition to ensure that the drainage scheme is implemented in line with the recommendations in the submitted FRA.

Air quality

London Plan policy 7.14 seeks to ensure that development proposals minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within air quality management areas and where the development is likely to be used by large numbers of people vulnerable to poor air quality (such as children or older people), such as by design solutions buffer zones or steps to promote greater use of sustainable transport modes. It requires particular attention to be paid to proposals such as housing, homes for elderly people, schools and nurseries.

Air quality impacts arising from the proposed development have been assessed in the ES. Four sources of emissions, which may affect air quality, have been identified:

- 1) Increase in traffic on the local roads, which may impact on air quality at existing residential properties;
- 2) The new residential properties and hospital buildings will be subject to the impacts of road traffic emissions from the adjacent road network;
- 3) Odour from Grove Farm, and adjacent equestrian centre, may have an effect close to the western boundary of the site;
- 4) Construction activities may impact upon both existing and new properties

In relation to point 1 above, the assessment has determined that the increase in traffic volumes on local roads, as a result of the proposed development, would lead to an imperceptible to small increase in concentrations of nitrogen dioxide at all of the receptors, apart from one, and the impact upon these receptors would be negligible. In relation to the one exceptional receptor (R9), the impact is predicted to be slight adverse. In relation to point 2 above, the impacts of local traffic on the air quality at receptors within the site have been shown to be acceptable, at the worst case locations, with concentrations being well below the air quality objectives. No mitigation measures are proposed. The Environmental Health department has advised that they are satisfied with the assessment and does not suggest any planning conditions.

In relation to point 3 above, the ES has specifically considered the impact of odour from Grove Farm and the adjacent equestrian centre, on the proposed residential development in the WDZ. The ES concludes that the potential for odour annoyance from Grove Farm is unlikely, with any odour being infrequent, of short duration, low intensity and not particularly unpleasant. Central to this conclusion is the proposed buffer of 25m between the western site boundary and proposed residential units. The Environmental Health department has advised that the submitted survey is of a satisfactory standard. Having visited the site, considered the proposed buffer zone and the conclusions of the

comprehensive odour survey, they have advised that there are no objections to the relationship between the proposed residential development in the WDZ and Grove Farm and the adjacent equestrian centre.

In relation to point 4 above, the ES concludes that the construction works have the potential to create dust and proposes a number of mitigation measures to minimise the impacts of this. These relate to site planning, construction traffic, demolition works and site activities. The Environmental Health department have advised that with the proposed mitigation measure, the dust impacts should be insignificant. However, due to the scale of the proposal and the proposed 12 year phasing of the scheme, they have advised that the submission of a dust management plan is required at reserved matters stage.

On the basis of the ES findings, the proposed mitigation measures and the advice received from the Environmental Health department, it is therefore considered that the proposed mitigation measures would ensure that the development would not give rise to undue air quality impacts. The proposal would therefore comply with the NPPF and London Plan policy 7.14 in this regard.

Ambient noise

London Plan policy 7.15 seeks to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. Chapter 10 of the ES considers the likely effects of the proposed development with respect to noise and vibration. This includes the effects of the existing conditions on the proposed development and the effects of noise and vibration generated by the development on surrounding properties, during demolition, construction and operational phases. The amendment of the application in February 2013 to close one entrance on Wood Lane has been considered within the ES addendum.

The assessment has been based on a series of environmental noise measurements undertaken at the site and noise predictions. The impact of noise and vibration during construction has been predicted and assessed in accordance with the relevant British Standard. Mitigation measures have been recommended, which when implemented are capable of ensuring that the impact of noise and vibration during the construction of the development would be adequately controlled, e.g. using 'silenced' plant and machinery; fitting acoustic enclosures to suppress noisy equipment; switching off engines where vehicles are left standing for a significant period of time.

An assessment has also been carried out to determine the suitability of the site for residential and hospital uses. This has concluded that the proposed dwellings located adjacent to the road network and Grove Farm would, in some instances require upgraded glazing and ventilation specifications, in order to achieve the required internal noise levels.

The impact of the traffic associated with the proposed development has been also assessed. It has been concluded that no significant increase in road traffic noise would be experienced at receptors adjacent to the surrounding roads, and the effects would therefore be negligible.

The Council's Environmental Health Officer is satisfied, subject to conditions, that the contents of the ES chapter on noise and vibration adequately address potential concerns over noise and vibration both during construction and during operation.

It is therefore considered that the proposed mitigation measures would ensure that neighbouring occupiers and future users of the site would not experience excessive noise and vibration levels as a result of construction activity or as a result of the types of uses proposed. The proposal would therefore comply with the NPPF and London Plan policy 7.15 in this regard.

12) ACCESSIBILITY AND INCLUSIVITY

As the application is (in the main) submitted in outline, full details of site levels and designs of individual buildings are not before the Council for consideration at this stage. The submitted Design Guidelines do address the matter of accessibility and inclusivity. However, they do not adequately address policy requirements. Notwithstanding this, it is considered that a fully accessible scheme is capable of being delivered. Detailed designs could therefore be the subject of a reserved matters submission. Subject to this condition, the proposal would comply with London Plan policies 3.8 and 7.2, which require all new developments to be fully accessible to all.

13) S17 CRIME & DISORDER ACT

As the application is submitted in outline, detailed drawings of building design and layout are not before the Council for consideration at this stage. Nonetheless, the Design Guidelines do refer to the need for the scheme to follow 'secure by design' principles. The illustrative masterplan indicates that an acceptable layout of each of the development zones can be provided in terms of natural surveillance of streets, spaces and parking courtyards. However, given the distances between each of the proposed development zones, careful consideration of the lighting of public spaces will be required. Further consideration would be given to this issue at reserved matters stage.

The Metropolitan Police Crime Prevention Design Advisor has requested detailed information relating to Secured by Design measures and this can be requested by condition. A further condition is also recommended to ensure that the public open spaces are adequately lit and further consideration of the layout of these spaces will be undertaken on consideration of reserved matters applications.

It is therefore considered that an acceptable arrangement can be provided throughout the scheme and the proposal would therefore not increase the risk or fear of crime.

14) EQUALITIES IMPLICATIONS

Equalities Act 2010

Section 149 of the Equalities Act 2010 created the public sector equality duty. It states:-

(1) A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have taken this into account in the assessment of this application and the Committee must be mindful of this duty inter alia when determining all planning

applications.

The redevelopment of the site seeks to provide by a modern 'fit for purpose' hospital replacing existing aged buildings. Detailed building and public realm designs are not before the Council at this time. Officers consider that the detail set out in the submitted Design Guidelines provide an approach that, in conjunction with the Parameter Plans, would ensure that detailed applications should make provision for the highest levels of inclusiveness. The proposal presents an opportunity to provide 19.2 hectares of valuable open space, to create green links to the surrounding network of green spaces and to provide on site play space, supporting community wellbeing, improving the quality of health and community facilities within the Borough and social cohesion. Social inclusion will be enhanced over the construction period by securing an appropriate employment and construction training programme by legal agreement.

In light of the above, it is considered that the proposed development would not result in any infringement on Equalities legislation.

Human Rights Act

In addition Members should note that the Human Rights Act 1998 (HRA 1998) makes it unlawful for the Council to act incompatibly with Convention rights. Decisions by the Committee must take account of the HRA 1998. Therefore, Members need to be aware of the fact that the HRA 1998 makes the European Convention on Human Rights ("the Convention") directly applicable to the actions of public bodies in England and Wales. The specific parts of the Convention relevant to planning matters are Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

This report has outlined the consultation that has been undertaken in relation to this planning application and the opportunities for people to make representations to the Council as the local planning authority. Members need to satisfy themselves that the measures proposed to minimise, inter alia, any adverse effects of the development are acceptable and that any potential interference with Article 8 rights will be legitimate and justified.

Both public and private interests are to be taken into account in the exercise of the Council's planning authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. Members must, therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

As set out above, it is necessary, having regard to the Human Rights Act 1998, to take into account any interference with private property rights protected by the European Convention on Human Rights and ensure that the interference is proportionate and in the public interest.

In this context, the balance to be struck between individual rights and the wider public interest has been carefully considered. Officers consider that any interference with Convention rights is justified. Officers have also taken into account the mitigation measures governed by planning conditions and the associated section 106 agreement to be entered into.

14) S.106 Obligations and Infrastructure

Below is the list of the proposed heads of terms that follow from the consideration of the

effects of the development (outlined in the appraisal) and the likely means by which these effects will be mitigated. The broad headings and contributions are considered to be reasonable and justified in accordance with the requirements in regulation 122 of the Community Infrastructure Regulations on the use of planning obligations, i.e. that they need to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) Fairly and reasonable related in scale and kind to the development.

Refinement of the schedule of contributions is currently on-going and a full schedule of proposed contributions with individual justification is expected to be reported finally to the Planning Committee, together with the phasing of such payments.

Open Space, sport and recreation

The submission of a long term management strategy for the publicly accessible open spaces, including funding arrangements, to be agreed in writing. Implementation of the strategy within 1 year from the first occupation of any of the new hospital buildings or residential development (whoever is the sooner).

Compliance with an environmental management Plan to be introduced across the site on a phased basis starting 1 year from the commencement of the development. The Environmental Management Plan to be agreed in writing with the Council prior to the implementation of the development. This will mitigate the impact of the demolition of the buildings on the land and the construction of the development on the surrounding environment. To include trees, biodiversity and green belt management

Public access strategy – the introduction and operation of a management plan to permit public access at reasonable times to the NAZ area of the site, and to permit its use in a manner consistent with its contribution as part of Harrow's Green Grid.

An off site contribution to sports and leisure facilities

Education

Off site contribution to Education provision in the Borough commensurate with the child yield of the development.

Transport and Travel

On and off site Traffic management and Highway works as follows:

- i) Parking Controls - A contribution [£75,000] towards the investigation and implementation of any combination of parking controls (including a Controlled Parking Zone) in the locality surrounding the site following completion of the PFI hospital at phase 2.
- ii) Strategic Green Travel Plan - A financial 'performance bond' [£30,000] to be applied to the CDZ (phase 2 onwards), WDZ (phase 4 onwards) and EDZ (phase 8 onwards) to incentivise modal shift targets toward sustainable transport once SMART targets are established at relevant future reserved matters application stages.
- iii) Bus Service/Infrastructure Contributions - A contribution toward providing a bus service either through or alongside the site for 3 years post mid-2015).

- A contribution (£22,000) toward two bus stop 'countdown' facilities in Brockley Hill.
 - A contribution (£20,000) toward provision of 'real time' information facilities within the site.
 - A contribution (£20,000) toward the upgrade of the Brockley Hill bus stops.
- iv) Traffic Calming- A contribution toward the implementation of traffic calming measures in Wood Lane.

All remaining highway enhancement works would be entered into and executed under s278 of the Highways Act 1980 with all related implementation costs absorbed by the developer at source negating any direct up front financial contribution.

Security of access for TfL/or appropriate alternative bus operator to enter and leave the site via a designated site access road without charge, and to drop off and pick up passengers from within the site at specific, designated points, pursuant to the operation of a public transport bus service.

Staff/Key worker Housing

All staff/key worker housing to be provided as intermediate housing and to be retained for that purpose

Employment and training

Engagement with the Councils Xcite programme (or other related employment programme operated for the purpose of promoting/enabling employment at the site), including an annual contribution for a period not greater than 5 years, starting with the commencement of the development hereby approved.

Enabling Development

To ensure that the development and disposal of the residential developments is tied to the delivery of the Hospital, and that any surplus receipts generated by the disposal of land for residential development, is utilised on the development of hospital facilities supporting RNOH at Stanmore, or on related infrastructure or environmental mitigations.

Monitoring and Compliance

Payment of the Councils monitoring costs

15) Mayoral CIL Liability

On 1st April 2012, the Mayor of London introduced a Community Infrastructure Levy (CIL) to raise £300 million towards the delivery of the Crossrail project. The CIL is applicable to any development granted planning permission on or after the 1st April 2012 and is collected by the Council once development commences. In Harrow, the CIL is chargeable at a rate of £35 per sqm and the chargeable amount should be calculated in accordance with Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended).

The applicant has provided a breakdown of the existing buildings on the site and their use. It is considered that this is an accurate representation of the existing situation and the total existing floorspace is 46,854sqm. The proposed hospital floorspace is not chargeable under the Mayoral CIL. However, the residential floorspace and the multi-storey carpark are both chargeable. The chargeable area is 55,408sqm at £35 per sqm, making a total of £1,939,280 payable for the whole development. A provisional liability

notice will be issued on this basis, with detailed payment arrangements to be agreed.

Harrow Council is progressing the preparation of a local CIL, but this has not yet been adopted.

16) CONSULTATION RESPONSES

Apart from the points raised in the above sections, other issues raised are:

- If a layout in which the majority of vehicle access is from Brockley Hill cannot be devised, and increased traffic along Wood Lane is inevitable, then a green bridge should be built to provide a safe route for wildlife between Pear Wood to the south and the RNOH site to the north - *This provision of a green bridge, in light of the other mitigation measures proposed and those that will be secured by condition and S.106 obligations, is not considered necessary.*
- The existing west lodge building should be refurbished and donated to the borough for use as a base by volunteer naturalists and school groups visiting the open spaces in the area, with sufficient section 106 monies given to maintain the building for a set period, perhaps ten years - *Regulation 122 of the Community Infrastructure Levy Regulations 2011 sets out the relevant tests for obligations that should be secured through a legal agreement on planning applications. This requirement would not meet these tests.*
- Extremely alarmed to find out that 834 trees are to be removed, some of which have preservation orders on - *Planning permission was granted for the removal of 170 trees from the site in January. The current proposal would involve the removal of a further 663 trees from the site (including protected trees (TPOs)) and 1.01 hectares of existing woodland. A tree replacement strategy would be secured by condition.*
- Oppose to the extent of proposed housing in an unsustainable location (PTAL rating 1) which will lead to residents relying almost entirely on vehicles for every day activities – *As detailed in the above appraisal, this is an enabling essential proposal and this is supported by the Development Plan. Furthermore, there is scope to provide a bus through the site and discussions are ongoing*
- We note that some 1400 car parking spaces are required under the Outline application and a further 196 spaces for the detailed application – *This figure is incorrect. Full details of carparking spaces are provided in the above report.*
- The "Outline" element is so that, at any time in the future, a further increase in levels of housing units or car parking spaces is possible and we strongly object to this "open ended" application - *The nature of an "Outline application" is to consider the principle of development within defined 'upper limit' parameters. Further detail of the application will be required in 'Reserved Matters' applications.*
- No projections of pollution or run off associated with moving the access to Wood Lane which, bearing in mind its ecological and environmental importance, could lead to degradation of the Ancient Woodland in particular and the Wood Lane corridor in general - *Consideration of pollution, contamination and ecological issues have been addressed in response above and in the Appraisal section of the report.*
- We could find no reports or comments from Harrow's Bio-diversity or Tree Officers – These comments are summarised within this appraisal
- Failed to find any communication with the Forestry Commission as to whether they have been notified of the huge tree loss requested – *The Forest Commission is not a statutory consultee*
- *The application* has been rushed through with little time for consultation of the wider

public – *A Statement of Community Involvement accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including extensive flyer distribution, press releases, presenting to a number of stakeholders and hosting two separate public exhibitions in April 2012 and July 2012. In addition, the applicant attended the Major Development Panel (MDP) in September 2012.*

- No need to increase parking over and above the present provision as there are frequent bus stops along Brockley Hill and Stanmore Hill. Have the hospital considered running a dedicated bus service for patients and visitors? – *The Hospital currently runs a shuttle bus from the hospital. Full consideration of the parking provision is contained within the above appraisal*
- The ecology study is a baseline one and there is no schedule for re-examination to determine if the mitigation is actually successful – *this will form part the long term management strategy to be secured through the S.106*
- Ecology Management is often not adhered to and the site degrades in quality, as a result - *Failure to adhere to the approved strategy would represent a breach of planning control which could be enforced*
- Loss of house value – *This is not a material planning consideration*
- This is a contaminated site – *Intrusive investigations will be carried out in phase 2 which is too late - The suggested conditions are considered to be robust and would address this matter*
- The online and even some hardcopy documents are hard to read and there is document duplication - *Given the scale of the application, some duplication of text within the document is unavoidable. Hard copies of the application have been placed in various locations within the borough and are considered adequate for the purposes of this application*
- The S106 money from such a development should be directed to the preservation and improvement of adjacent wildlife sites, through Harrow Nature Conservation Forum – *The long term management strategy for the site will be secured through the S.106*

CONCLUSION

This hybrid application for the comprehensive redevelopment of RNOH follows from an earlier and extant planning permission granted in 2007. In 2007, and 2010, the Council considered that the principle of redeveloping the hospital using resources secured by an “enabling” residential development was acceptable, notwithstanding the sites location in the green belt, and its particular environmental and physical characteristics.

Since the grant of that planning permission, the Council has adopted a new Core Strategy, and has reached an advanced state in the preparation of the site allocations DPD. Both documents provide explicit support and recognition of the need for enabling residential development to support new healthcare development on the site. The National Planning Policy Framework, adopted in early 2012, reaffirm the governments commitment to Green Belts, but recognises, along with the provisions within the Localism Act, the importance of promoting sustainable development – to include economic as well as environmental sustainability. Officers, and the Mayor of London are satisfied that the principle of development described in the current application, despite the inclusion of a greater quantum of residential “enabling development” (which would usually be inappropriate development on its own), is acceptable, both having regard to National Planning policy, and to the Mayor and Harrow’s existing and emerging development plan

documents.

The environmental assessment, transport assessment and associated documentation accompanying the application, make it clear that the proposals will result in significant, prolonged and permanent changes within the site. The creation of 3 development zones and the dedication of a large amenity zone require comprehensive demolition across the site, and the creation of substantial new buildings, access routes, and landscaping. The “amenities” associated with the new development, including an internal bus route, service roads, play areas for residential sites and the substantial new buildings, including Multi storey car park, will change the character of the built environment within the site. The master plan has nevertheless been developed collaboratively with officers from the Council with the objective of recognising the objectives set for the use of green belt land, and with particular regard to the policy requirement to promote openness. The master plan replaces the ad-hoc and piecemeal layout of uses and spaces within the site with a more deliberate layout of buildings, functions and spaces that respond to the sites role within the “Green Grid” emerging in this part of London.

The master plan has been informed by the sensitivity of the ecological assets that the site enjoys. The environmental information within the submitted environmental statement is considered sufficient to enable the assessment of environmental effects, and the identification of appropriate mitigation measures. Considerable unease remains, expressed through the representations received, about the effect of the development itself on the ecology, groundwater and biodiversity within the surrounding the site. These concerns are acknowledged. Officers are nevertheless satisfied that these impacts can be adequately mitigated by planning conditions and controls, so that they need not require refusal of the planning application.

The representations received also demonstrate almost universal concern about the effect of traffic arising from the development, and its assignment/change compared to the existing circumstances. This includes concerns expressed by the neighbouring Council. The applicant’s master plan provides for fewer access points than existing on Wood Lane, and for signalisation of the Wood Lane Brockley Hill Junction. A new mini roundabout access to the site adjacent to the point of an existing access on Wood lane is claimed to result in the re-assignment (once the scheme is completed) of a proportion of traffic from the Brockley Hill entrance to Wood Lane. The transport assessment acknowledges that the effect of the development will be to create congestion and queuing around the site at the peak hour. Outside of these times, traffic (and the junctions) will operate within capacity.

The transport impacts of the development can only be partially mitigated. The site has PTAL rating of 1 and has limited access to public transport. Car ownership in this part of the borough is high, along with car usage. The roads pass through Green Belt which has a rich ecology, and attractive rural character. Accommodation of the full implications of traffic growth arising from the development is considered by Officers to be undesirable, because of the significant and adverse consequences of the physical works on the environment of this part of the green belt. Instead, the application proposes to balance physical improvements with demand/behaviour change strategies – captured in the green travel plan and parking management strategy. The development will nevertheless be required to contribute towards reducing traffic speeds on Wood lane, improving pedestrian safety and crossing facilities, and supporting directly public transport. Officers consider that this balanced approach, tolerating peak hour congestion but retaining much of the existing rural character and safeguarding the ecology of the site and surroundings,

is an appropriate and proportionate approach.

The outline planning applications reserves much of the detail of the development for future consideration by this committee, and by officers. The impacts and measures identified in the sections above, and the concerns of residents, amenity associations and neighbouring interests are all acknowledged. Subject to a comprehensive schedule of planning obligations and planning conditions, set out within the recommendation, officers nevertheless consider that the principle of this development, and the specific characteristics of the master plan and enabling development are worthy of support. The development will bring about a £450m investment into the borough supporting existing jobs at the site and creating many more in construction and through apprenticeships/skills development. The development will enable RNOH to continue to occupy the site at Stanmore in buildings worthy of their world class reputation. Through the S106 agreement, the proposal will enable pro-active management of the ecology and spaces within this part of the green belt. The proposal will also make a significant contribution to housing delivery within the borough.

The detailed parts of this application represent the pre-cursor to this exciting project. The works enable the delivery of the master plan, having regard to the funding and operational limitations that the RNOH trust is under. On their own, the temporary and permanent works would be ad hoc and undesirable. In enabling the delivery of the master plan, and subject to the specific controls identified, they are nevertheless considered to be acceptable.

As a whole, the proposals are considered to represent a viable, and on balance acceptable form of development, compliant with the provisions of the NPPF and the adopted and emerging development plan documents. Subject to the appropriate referral of these proposals to the Mayor of London, and to the Secretary of State, and the prior completion of a S.106 agreement, the application should accordingly be approved.

CONDITIONS

COMMENCEMENT

1 The development shall be begun not later than three years from the date of this permission or two years from the final approval of the first Reserved Matters application, whichever is the later.

REASON: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

2 This permission shall lapse unless the first Reserved Matters application is made within two years of the date of this permission.

REASON: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

APPROVAL OF RESERVED MATTERS

3 Approval of the details shown below (the Reserved Matters) for each phase of development shall be obtained from the local planning authority in writing before any development in that phase is commenced:

- a) layout
- b) scale
- c) appearance
- d) access

e) landscaping

REASON: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

4 No later than ten years following the date of this permission, an application or applications shall have been submitted to the local planning authority for the approval of Reserved Matters in respect of all the built accommodation in the development hereby permitted.

REASON: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

5 No Reserved Matters approval shall be implemented more than twelve years from the date of this permission or two years from the date of the final approval of any Reserved Matters application, whichever is the later.

REASON: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

PHASING

6 The development shall be carried out only in accordance with an approved scheme of phasing that shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development described in the first approved reserved matters application. The scheme of phasing shall set out how each phase of development will be accompanied by associated transport and public realm works, and the on and off site mitigation measures, comprised within the planning permission and associated conditions.

REASON: To ensure that the impacts of the development throughout the implementation of the planning permission, are properly mitigated in accordance with the Environmental Assessments and the conclusions of officers in respect of the developments compliance with the National Planning Policy Framework and the Development Plan.

7 Unless otherwise agreed in writing by the Local Planning Authority, all of the site access works required by this planning permission shall be completed prior to the occupation of Phase 5 of the development in accordance with detailed plans to be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the transport impacts associated with the access provisions hereby permitted are completed in the interests of managing traffic flows and the safe passage of pedestrians and vehicles on roads surrounding the site in accordance with the provisions of Policies 6.3 and 6.12 of the London Plan and Harrow Core Strategy respectively.

DEVELOPMENT TO BE CARRIED OUT IN ACCORDANCE WITH PERMISSION

8 The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Outline Element - Plans for Approval:

001_P-LCN_Rev B Site Location Plan; 101204-D-786-Rev S CDZ Development Parameter Plan; 101204-D-789-Rev K CDZ Landscape Parameter Plan; WDW_PP_001_Rev J WDW Development Parameter Plan; WDW_PP_002_Rev G WDW Landscape Parameter Plan; EDZ_PP_001_Rev K EDZ Development Parameter Plan; EDZ_PP_002_Rev J EDZ Landscape Parameter Plan; 32-1011.01-J Tree Survey + Retention Renewal Plan; S1-32-1011.01-J Tree Survey + Retention Renewal Plan; S2-32-1011.01-J Tree Survey + Retention Renewal Plan; S3-32-1011.01-J Tree Survey + Retention Renewal Plan; Design Guidelines

Detailed Element - Plans for Approval:

50200267_U9022 Enabling Works Site Locations; 50200267_U9100 Key Plan; 50200267_U9000 Temporary Car park Layout ; 50200267_U9001 Road Vehicle Track; 50200267_U9002 Junction Vehicle Track; 50200267_U9003 Access Road Vehicle Track; 50200267_U9004 Access Road Vehicle Track; 50200267_U9005 Access Road Layout
50200267_U9006 Access Road Layout; 50200267_U9008 Estate Compound Layout; 50200267_U9009 demolition Site Plan; 50200267_U9010 Service Route & PH; 50200267_U9011 Temporary Car parks External; Lighting; 50200267_U9012 Access Road Lighting Sheet 1; 50200267_U9013 Access Road Lighting Sheet 2; 50200267_U9014 Estates Compound Lighting ; 50200267_U9015 Access Road Sections; 50200267_U9018 Extent of Enabling Works; 50200267_U9019 Visibility Splays; 50200267_U9020 Task 1 Site Locations; 50200267_U9021 Temporary Car park details; U9024 REV A Typical Street Lighting Details; 2620-101B Enabling Works - Access Road and Car Park (1 of 2); 2620-102B Enabling Works - Access Road and Car Park (2 of 2); 2620-103B Enabling Works Temporary Car Park; 2620-104B Enabling Works Temporary Estates Compound; 50200267_U9007_F Aspire Buildings Access Road & Car park

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

PARTICULARS TO ACCOMPANY RESERVED MATTERS APPLICATIONS

- 9 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by a design audit. The design audit submitted shall set out (as appropriate) how the development described in the reserved matters:
- a. complies with the approved "Design Guidelines," Masterplan and Parameters Plans
 - b. complies with the Mayors of London's adopted housing design guidance in force at the time of the reserved matters submission and any SPD in force as part of the Harrow Local Plan
 - c. complies with the London Plan requirements for Lifetimes Homes and accessible housing in force at the time of the reserved matters submission.
 - d. meets the required commitment to a reduction in Carbon Dioxide emissions in force at the time of the reserved matters submission through the Local (Development) Plan or associated SPD for the area.
 - e. how energy shall be supplied to the building(s), highlighting;
 - i. how the building(s) relate(s) to the site-wide energy strategy; and
 - ii. any other measures to incorporate renewables.
 - f. how the proposed non residential building(s) have been designed to achieve a rating of BREEAM 'Excellent' or and how the proposed residential development has been designed to achieve a minimum Code for Sustainable Homes Level 4; (or equivalent replacement standard in force at the time of the reserved matters submission)
 - g. contributes to the objectives of "secure by design" (or its replacement).

REASON: To ensure good design and high quality architecture throughout the development in line with the principles set out in the approved Design Guidelines (February 2013), including protection of Green Belt openness and the character and appearance of the wider area, in accordance with the Environmental Impact Assessment, in line with the objectives of the NPPF, London Plan (2011) policies 7.3, 7.4, 7.5, 7.6 and

7.16, Core Strategy (2012) policy CS1, saved UDP policies D4 and D9 and Section 17 of the Crime & Disorder Act 1998 and contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11 and Harrow Core Strategy (2012) policy CS1.

10 Unless otherwise agreed in writing with the Local Planning Authority, applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping in the Central Development Zone shall be accompanied by information sufficient to demonstrate the impact of the development on views from the north of the site.

REASON: To ensure that the large scale developments in the CDZ respond positively to the sites visibility from, and special character within the Green Belt; in the interests of safeguarding openness and the character and appearance of the wider area, in accordance with the Environmental Impact Assessment and the objectives of the NPPF, London Plan (2011) policies 7.4, 7.6 and 7.16, Core Strategy (2012) policy CS1, saved UDP policy D4.

11 Applications for approval of Reserved Matters submitted pursuant to this permission shall be accordance with the site-wide Energy Strategy to be approved by the local planning authority under condition 35. The Energy Strategy shall explain:

- (a) how the proposed building design(s) realise(s) opportunities to include design and technology energy efficiency measures;
- (b) the reduction in carbon emissions achieved through these building design and technology energy efficiency measures, compared with the emissions permitted under the national Building Regulations prevailing at the time the application(s) for approval of Reserved Matters are submitted;
- (c) the specification for any green and/or brown roofs;
- (d) how energy shall be supplied to the building(s), highlighting;
 - i. how the building(s) relate(s) to the site-wide strategy for district heating incorporating tri-generation from distributed combined heat and power; and
 - ii. any other measures to incorporate renewables.
- (e) how the building(s) have been designed to achieve at least the minimum requirement under BREEAM or Code for Sustainable Homes (or an equivalent assessment method and rating) prevailing at the time the application(s) for approval of Reserved Matters are submitted; and
- (f) preparation of a Site Waste Management Plan (SWMP), to comply with Best Practice Standards.

REASON: To ensure that the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11 and Core Strategy (2012) policy CS1.

12 Unless otherwise agreed in writing by the Local Planning Authority, applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping of the public realm shall be accompanied by a detailed Ecology and Biodiversity Statement. The Ecology and Biodiversity Statement

shall demonstrate how the development will facilitate :

- (a) the incorporation of new habitats, including bird boxes, bat roosts and other wildlife features;
- (b) the creation of wildlife habitats within the public realm, integrated into the detailed SUDS designs (i.e. standing and running water, grassland, log piles, green/brown roofs); and
- (c) the management arrangements for these features.

REASON: To ensure that the development contributes to improving the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 7.19, Core Strategy (2012) policy CS1 and saved UDP policy EP26.

13 Unless otherwise agreed in writing by the Local Planning Authority, applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Construction Environmental Management Plan (CEMP). This document shall include:

- (a) details of the proposed Best Practice Measures (BPM) to be implemented during construction of that phase of development to suppress dust and minimise noise and vibration associated with demolition/building works;
- (b) a full detailed noise and vibration assessment for that phase;
- (c) the measures proposed to reduce and remove risks to the water environment and reduce flood risk during construction;
- (d) a full Construction Logistics Plan, which demonstrates how the impact of construction vehicles would be minimised;
- (e) details of proposed hours of work for construction activity; and
- (f) a summary of how the measures proposed address the mitigation identified in the Environmental Impact Assessment.

REASON: To ensure that the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11 and Core Strategy (2012) policy CS1.

14 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale and appearance in the Eastern Development Zone and the Western Development Zone shall be accompanied by a detailed Housing Schedule. This document shall explain:

- (a) the type and mix of units proposed;
- (b) the housing typologies
- (c) the gross internal floor areas of each dwelling;

REASON: To ensure that the development provides an appropriate mix and quality of housing, in accordance with the NPPF, London Plan (2011) policies 3.5, 3.8 and 3.12, Core Strategy (2012) policy CS1 and the Mayor of London's Housing Supplementary Design Guidance (2012)

15 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale and appearance of residential development in the Eastern or Western Development Zones shall be accompanied by a detailed play strategy. This document shall:

- (a) explain how the proposed play space provision meets the needs of the housing mix within the respective Development Zones;

- (b) provide a clear rationale for the proposed location of play space;
- (c) provides age appropriate play facilities
- (d) Meets the standards for play space provision set out in the development plan for the area in force at the time of the reserved matters submission.

REASON: To ensure that the development provides an appropriate mix and quality of housing, as well as providing an appropriate amount and mix of affordable housing having regard to the relevant viability assessment, in accordance with the NPPF, London Plan (2011) policies 3.5, 3.8 and 3.12, Core Strategy (2012) policy CS1 and the Mayor of London's Housing Supplementary Design Guidance (2012)

16 Unless otherwise agreed in writing with the Local Planning Authority, applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and landscaping shall be accompanied by a detailed Surface Water Drainage Scheme for the area covered by that reserved matter. The Surface Water Drainage Scheme shall explain how the development proposed meets the requirements of the approved Surface Water Drainage Strategy secured by condition no. 28. This details submitted shall explain:

- (a) the proposed use of Sustainable Urban Drainage Systems (SUDS) to manage surface water run-off, including the provision of soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands;
- (b) surface water attenuation, storage and disposal works, including relevant calculations;
- (c) works for the disposal of sewage associated with the development.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with the Environmental Impact Assessment, in line with the recommendations of Core Strategy (2012) policy CS1 and the NPPF.

17 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Accessibility Strategy. This document shall explain:

- (a) how the proposed public realm areas would be accessible to all, including details of finished site levels, surface gradients and lighting;
- (b) how each of the hospital buildings and the multi-storey carpark would be accessible to all, including details of level access and internal accommodation arrangements;
- (c) that each of the residential dwellings would comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance;
- (d) that the patients family accommodation would comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance.

REASON: To ensure that the development is accessible and inclusive to all, in line with the recommendations of London Plan (2011) policies 3.8 and 7.2 and Core Strategy (2012) policy CS1.

18 Unless otherwise agreed in writing by the Local Planning Authority, applications for approval of landscaping Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Lighting Strategy in line with the Code of Practice for the Reduction of Light Pollution issued by the Institute of Lighting Engineers. This strategy shall include details of the location, height and design of all lighting, the intensity of light to be emitted and the surface area to be illuminated. It shall explain:

- (a) the requirement for the lighting proposed in public realm areas and buildings.
- (b) how the proposed lighting minimises impacts on biodiversity

REASON: To ensure that the development is adequately lit in order to minimise the risk

and fear of crime, whilst ensuring that the proposed lighting would not unduly impact on local character, amenity or biodiversity, in line with the recommendations of London Plan (2011) policies 7.3 and 7.19 and Core Strategy (2012) policy CS1.

19 Prior to the commencement of each phase of the development hereby approved, details of:

- (a) the storage and disposal arrangements for refuse and waste associated with buildings and external areas within the phase, including vehicular access thereto;
- (b) the storage and disposal arrangements for refuse and waste associated with proposed public realm areas, including vehicular access thereto;
- (c) the proposed arrangements for the Management of clinical waste.

shall be submitted to and approved in writing by the LPA. The development shall be carried out in accordance with the details hereby approved unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that adequate refuse storage and disposal facilities are provided, in the interests of local character and amenity, in line with the recommendations of Core Strategy (2012) policy CS1.

20 Development within each of the phases of development hereby approved shall be carried out only in accordance with a detailed Arboricultural Report for that phase of development which shall be submitted and approved in writing by the Local Planning Authority prior to commencement of any development within that phase. This document shall explain how the trees outlined in pink on drawing No XXXXXXXX are to be retained, together with measures for their protection during the course of the development. If any trees outlined in pink are to be removed, lopped or topped, a full justification must be provided. This document shall also provide details of and a rationale for the proposed replacement tree planting within that phase, in accordance with the site-wide landscape strategy and the mitigation required by the Environmental Statement.

REASON: To safeguard the Green Belt and the character and appearance of the area and to enhance the appearance of the development, in line with the requirements of London Plan (2011) policies 7.4 and 7.21, Core Strategy (2012) policy CS1 and saved UDP policies D4, D9 and D10.

21 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and access shall be accompanied by a parking and access statement.

This document, where appropriate, shall include:

- (a) details of car parking provision for the Eastern and Western Development Zones, in accordance with London Plan policy 6.13;
- (b) a detailed Parking Management Strategy for that part of the development (including car club provision);
- (c) details of cycle parking provision for each of the proposed uses;
- (d) details of the location and specification of electric car charging points;
- (e) details of pickup and drop off facilities for the hospital (in applications relating to the hospital only);
- (f) details of motorcycle and scooter parking;
- (g) details of pedestrian and cycle routes throughout that part of the scheme and how this relates to the overall site-wide approach as set out in the Design Guidelines;
- (h) details of pedestrian and vehicle signage and wayfinding within the development;
- (i) details of enforcement procedures for parking offences on unadopted roads;

Unless otherwise agreed in writing by the Local Planning Authority, the development shall be carried out in accordance with the approved parking and access statement.

REASON: To ensure that adequate levels of parking are proposed, that sustainable means of transport are encouraged and to ensure that no unacceptable increase in traffic movements result, in line with the recommendations of the Transport Assessment, the addendum to the Transport Assessment and Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policies 6.3 and 6.13, Core Strategy (2012) policy CS1 and saved UDP policy T6.

22 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by a detailed Heritage Impact Assessment. This document shall explain how the proposed development addresses the setting and special interest of the heritage assets on and off the site.

REASON: To ensure that the development preserves or enhances the setting and special interest of heritage assets on the site and elsewhere, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 7.8, Core Strategy (2012) policy CS1 and saved UDP policy D11 and D14.

TRANSPORT

23 Prior to the commencement of any part of the development within the CDZ, a scheme for the improvement of the safety and amenity of bus passengers on Brockley Hill shall be implemented in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the development helps support the achievement of the mode shift targets within the submitted Transport Assessment, in the interests of mitigating the transport impacts of the development on surrounding roads in accordance with policy objectives of the London Plan and Harrow Core Strategy.

HERITAGE AND ARCHAEOLOGY

24 A) No development shall take place in the Eastern Development Zone until the applicant has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority.

B) No development or demolition shall take place in the Eastern Development Zone other than in accordance with the Written Scheme of Investigation approved under Part (A).

C) Development within the Eastern Development Zone shall not be occupied until the site investigation and post investigation assessment for that phase has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

REASON: Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with the Environmental Impact Assessment and recommendations given by the borough, the NPPF, London Plan policy 7.8 and Core Strategy policy CS1.

25 A) No development shall take place in the Eastern or Western Development Zones until the applicant has secured the implementation of a programme of archaeological recording of the standing historic buildings in accordance with a Written Scheme of

Investigation which has been submitted by the applicant and approved by the local planning authority.

B) No development or demolition shall take place in the Eastern or Western Development Zones other than in accordance with the Written Scheme of Investigation approved under Part (A).

C) Development within the Eastern and Western Development shall not be occupied until the site investigation and post investigation assessment for that phase has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.

REASON: Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with the Environmental Impact Assessment and recommendations given by the borough, the NPPF, London Plan policy 7.8 and Core Strategy policy CS1.

LAND CONTAMINATION AND REMEDIATION

26 Prior to commencement of each phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), no development shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

(i) A site investigation scheme undertaken by competent persons, based on the submitted Phase 1 Ground Conditions Report (produced by cnm, dated September 2012), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. The report of the findings must include;-

(i) A survey of the extent, scale and nature of contamination

(ii) An assessment of the potential risks to

- Human health
- Property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes
- Adjoining land
- Groundwaters and surface waters
- Ecological systems
- Archaeological sites and ancient monuments

(ii) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

(iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

REASON: To protect groundwater and the future end users of the site and neighbouring sites, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policies 5.3 and 5.21, Core Policy CS 1 and saved UDP policy EP22.

27 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, 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 protect groundwater and the future end users of the site and neighbouring sites, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policies 5.3 and 5.21, Core Policy CS 1 and saved UDP policy EP22.

27 Prior to occupation of buildings in each phase of development, a verification report demonstrating completion of the works set out in the approved remediation strategy for that phase and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.
REASON: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21. This condition ensures that any verification works identified in the plan are successfully carried out.

FLOOD RISK AND DRAINAGE

28 Prior to the submission of the first reserved matters application(s), a drainage strategy for the entire site shall be submitted to and agreed in writing by the local planning authority in consultation with the sewerage undertaker. This drainage strategy shall provide details of any on and/or off site drainage works. In accordance with the submitted Flood Risk Assessment (produced by cnm, revision P4, dated January 2013), the drainage strategy shall include:

- SuDS features, including green roofs, ponds, swales and infiltrations strips.
- Soakage tests for where infiltration is proposed.
- All required attenuation to be provided using above ground SuDS.
- Runoff following development to be limited to no greater than 5 litres per second per hectare, up to the 1 in 100 year event plus climate change.
- For the detailed application works, runoff following development to be limited to no greater than 133 litres per second up to the 1 in 100 year event plus climate change.
- Details of how the scheme shall be maintained and managed after completion.

Any application for Reserved Matters shall be in accordance with the approved drainage strategy.

Unless otherwise agreed in writing by the Local Planning Authority, the development shall be carried out only in accordance with the approved strategy.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with the Environmental Impact Assessment, in line with the recommendations of Core Strategy (2012) policy CS1 and the NPPF.

29 No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

REASON: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21. This condition ensures that any verification works identified in the plan are successfully carried out.

ECOLOGY AND BIODIVERSITY

30 No development shall take place until a scheme for the provision and management of at least a five metre wide buffer zone alongside the watercourse and ponds has been submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority.

REASON: Land alongside watercourses and ponds is particularly valuable for wildlife and it is essential that this is protected in line with your policies EP26 and EP28, draft Development Management policies 18, 27 and 28 and policies 5.3, 7.19 and 7.28 of the London Plan.

31 No development shall take place until a detailed method statement for removing the Japanese Knotweed on site is submitted to and approved in writing by the local planning authority. Development shall proceed in accordance with the approved method statement.

REASON: This condition is necessary to prevent the spread of Japanese Knotweed which is an invasive species. Without it, damage could be caused to the nature conservation value of the site contrary to the National Planning Policy Framework, your policies EP26 and EP28, draft Development Management policy 27 and policies 5.3 and 7.19 of the London Plan.

32 No demolition of buildings or removal of trees or shrubs shall take place between the months of February to September inclusive, unless otherwise agreed in writing by the local planning authority.

REASON: To safeguard the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF, London Plan policy 7.19 and Core Strategy policy CS1.

33 No demolition of buildings or removal of trees or shrubs shall take place in any phase of development hereby permitted until up-to-date bat and breeding bird surveys has been submitted and approved by the local planning authority for that phase of development. If evidence of bat or breeding birds are found prior to demolition, specific mitigation measures should be included in any submission for the written approval of the local planning authority. Development shall proceed in accordance with any approved mitigation measures.

REASON: To safeguard the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF, London Plan policy 7.19 and Core Strategy policy CS1.

34 The development hereby approved shall make provision for the incorporation of bird boxes, bat roosts and other wildlife features on buildings;

(d) the creation of wildlife habitats within the public realm, integrated into the detailed SUDS designs (i.e. standing and running water, grassland, log piles, green/brown roofs); and

(e) the management arrangements for these features.

Details explaining how these features are to be provided, shall be included with each, relevant, reserved matters submission and shall be implemented prior to occupation of that building or area to which the mitigation measures relate.

REASON: To ensure that the development contributes to improving the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 7.19, Core Strategy (2012) policy CS1, and saved UDP policy EP26.

ENERGY

35 Notwithstanding the Energy Strategy submitted, a revised site-wide energy strategy shall be submitted to and agreed in writing by the local planning authority prior to the submission of the first reserved matters application(s). Any application for Reserved Matters shall be in accordance with the approved Energy Strategy.

REASON: To ensure that the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11 and Harrow Core Strategy (2012) policy CS1.

DETAILED ELEMENT

36 The 'detailed element' of this Hybrid application hereby permitted shall not be commenced until works for the disposal of surface water have been submitted to, and approved in writing by, the local planning authority.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with the Environmental Impact Assessment, in line with the recommendations of Core Strategy (2012) policy CS1 and the NPPF.

37 The 'detailed element' of this Hybrid application hereby permitted shall not be commenced until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with the Environmental Impact Assessment, in line with the recommendations of Core Strategy (2012) policy CS1 and the NPPF.

38 Notwithstanding the lighting details provided in relation to the 'detailed element' of the Hybrid application, this 'detailed element' shall not commence until details of the intensity of light emissions (including the surface area to be illuminated) have been submitted to and approved in writing by the local planning authority.

REASON: To ensure that the proposed lighting would not unduly impact on biodiversity, in line with the recommendations of London Plan (2011) policy 7.19 and Core Strategy (2012) policy CS1.

INFORMATIVES

1 REASON FOR GRANT OF PLANNING PERMISSION

The local planning authority considers that the principle of the hybrid application for the comprehensive redevelopment of the site to provide new hospital buildings worthy of the world class reputation of the Royal National Orthopaedic Hospital 'enabled' by new residential development is acceptable, notwithstanding the location of the site in the Green Belt, and the particular environmental and physical characteristics of the site.

The application material, including the Environmental Information contained within the Environmental Statement, Traffic Assessment and numerous other technical reports demonstrate that the proposals will result in significant, prolonged and permanent changes within the site and surrounding environs. However, the proposals have been developed to adhere to the masterplan for redevelopment of the site, recognising the objectives of the use of green belt land, with particular regard to the policy requirements to promote openness ensuring that the existing ad-hoc and piecemeal layout of uses and spaces within the site is replaced with a layout of function that responds positively to the sites roles within the 'Green Grid' emerging in this part of London.

The masterplan for the development of the site has been informed by the sensitivity of the ecological assets that the site enjoys and the proposals will result in long term and permanent impacts on the ecological assets of the area. Nonetheless, the robust use of conditions, development obligations and mitigation strategies proposed will ensure the overall impact on development will not adversely impact on the long-term ecological importance of the site.

The site is located within an area of low public transport accessibility and car ownership levels in this part of the borough are high. The proposals will result in significant levels of additional vehicular traffic through and around the site. To mitigate against the increased levels of vehicular activity in the locality, contributions are sought in relation to strategies to ensure that highway safety and convenience is maintained including the provision of bus routes through the site and these strategies are considered to be appropriate and proportionate.

Having regard to the environmental, economic and social impacts of development, the development will result in significant levels of investment derived from the development to support existing and future jobs on the site whilst providing for world class healthcare facilities on the site. The particular environmental impacts of the development are acknowledged. However, having regard to the robust mitigation strategies proposed for the development, the provisions of the NPPF and the adopted and emerging development plan document and all other material planning considerations including representations received through the consultation process, the proposals are considered to represent a viable, and on balance, acceptable form of development.

The following policies in the NPPF, London Plan, Core Strategy and Harrow Unitary Development Plan are relevant to this decision:

National Planning Policy and Guidance:

National Planning Policy Framework (2012) (NPPF)

Planning for Town Centres: Practice Guidance on Need, Impact and the Sequential Approach (2009)

The London Plan (2011):

2.13 – Opportunity Areas and Intensification Areas

- 2.15 – Town Centres
- 2.17 – Strategic Industrial Locations
- 2.18 – Green Infrastructure: The Network of Open and Green Spaces
- 3.1 – Ensuring Equal Life Chances for All
- 3.2 – Improving Health and Addressing Health Inequalities
- 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
- 3.11 – Affordable Housing Targets
- 3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- 3.13 – Affordable Housing Thresholds
- 3.16 – Protection and Enhancement of Social Infrastructure
- 3.17 – Health and Social Care Facilities
- 3.18 – Education Facilities
- 3.19 – Sports Facilities
- 4.5 – London’s Visitor Infrastructure
- 4.6 – Support for and Enhancement of Arts, Culture, Sport and Entertainment Provision
- 4.7 – Retail and Town Centre Development
- 4.8 – Supporting a Successful and Diverse Retail Sector
- 4.9 – Small Shops
- 4.10 – New and Emerging Economic Sectors
- 4.12 – Improving Opportunities for All
- 5.2 – Minimising Carbon Dioxide Emissions
- 5.3 – Sustainable Design and Construction
- 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
- 5.15 – Water Use and Supplies
- 5.21 – Contaminated Land
- 6.3 – Assessing Effects of Development on Transport Capacity
- 6.9 – Cycling
- 6.10 – Walking
- 6.12 – Road Network Capacity
- 6.13 – Parking
- 7.1 – Building London’s Neighbourhoods and Communities
- 7.2 – An Inclusive Environment
- 7.3 – Designing Out Crime
- 7.4 – Local Character
- 7.5 – Public Realm
- 7.6 – Architecture
- 7.8 – Heritage Assets and Archaeology
- 7.13 – Safety, Security and Resilience to Emergency
- 7.14 – Improving Air Quality

7.15 – Reducing Noise and Enhancing Soundscapes
7.17 – Metropolitan Open Land
7.18 – Protecting Local Open Space and Addressing Local Deficiency
7.19 – Biodiversity and Access to Nature
7.21 – Trees and Woodlands
Supplementary Planning Guidance: Industrial Capacity (2008)
Draft Supplementary Planning Guidance: Land for Industry and Transport (February 2012)

Local Development Framework Core Strategy and Area Action Plan

Local Development Framework: Harrow Core Strategy (2012)
Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation Document (2012)

Evidence Base Documents

Retail Study Review (2009)
Employment Land Review (2010)
Strategic Flood Risk Assessment (2009)
Draft Harrow Views Assessment (2012)
Open Space PPG17 Study (2011)
Draft Outdoor Sports Strategy (2012)

London Borough of Harrow Unitary Development Plan (2004):

EP12 – Control of Surface Water Run-Off
EP15 – Water Conservation
EP22 – Contaminated Land
EP25 – Noise
EP26 – Habitat Creation and Enhancement
EP27 – Species Protection
EP43 – Green Belt and Metropolitan Open Land Fringes
EP47 – Open Space
D4 – The Standard of Design and Layout
D5 – New Residential Development – Amenity Space and Privacy
D9 – Streetside Greenness and Forecourt Greenery
D10 – Trees and New Development
D11 – Statutorily Listed Buildings
D19 – Ancient Monuments
D20/D21/D22 – Sites of Archaeological Importance
D31 – Views and Landmarks
T6 – The Transport Impact of Development Proposals
T12 – Reallocating Available Roadspace and Managing Traffic
T13 – Parking Standards
T15 – Servicing of New Developments
H7 – Dwelling Mix
H14 – Residential Institutions
EM6 – Limiting Goods Sold at Out or Edge of Centre Developments
EM9 – Variety of Unit Sizes
EM12 – Small Industrial Units and Workshops
EM14 – Land and Buildings in Business, Industrial and Warehousing Use – Designated Areas
EM22 – Environmental Impact of New Business Development
EM25 – Food, Drink and Late Night Uses

R4 – Outdoor Sports Facilities
R7 – Footpaths, Cyclepaths and Bridleways
R8 – Play Areas
R11 – Protecting Arts, Culture, Entertainment and Leisure Facilities
R13 – Leisure Facilities
C2 – Provision of Social and Community Facilities
C7 – New Education Facilities
C8 – Health Care and Social Services
C10 – Community Buildings and Places of Worship
C16 – Access to Buildings and Public Spaces
C17 – Access to Leisure, Recreation, Community and Retail Facilities
Supplementary Planning Document: Sustainable Building Design (2009)
Supplementary Planning Document: Accessible Homes (2010)
Supplementary Planning Document: Access For All (2006)
Supplementary Planning Document: Residential Design Guide (2010)

2 COMMUNITY INFRASTRUCTURE LEVY

Please be advised that approval of this application (either by Harrow Council, or subsequently by PINS if allowed on Appeal following a Refusal by Harrow Council) will attract a liability payment of £1,939,280 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and S211 of the Planning Act 2008.

Harrow Council as CIL collecting authority on commencement of development will be collecting the Mayoral Community Infrastructure Levy (CIL).

Your proposal is subject to a CIL Liability Notice indicating a levy of £1,939,280 for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of sqm

You are advised to visit the [planningportal](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil) website where you can download the appropriate document templates.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

3 COMPLIANCE WITH PLANNING CONDITIONS

IMPORTANT: 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.

Plan Nos:

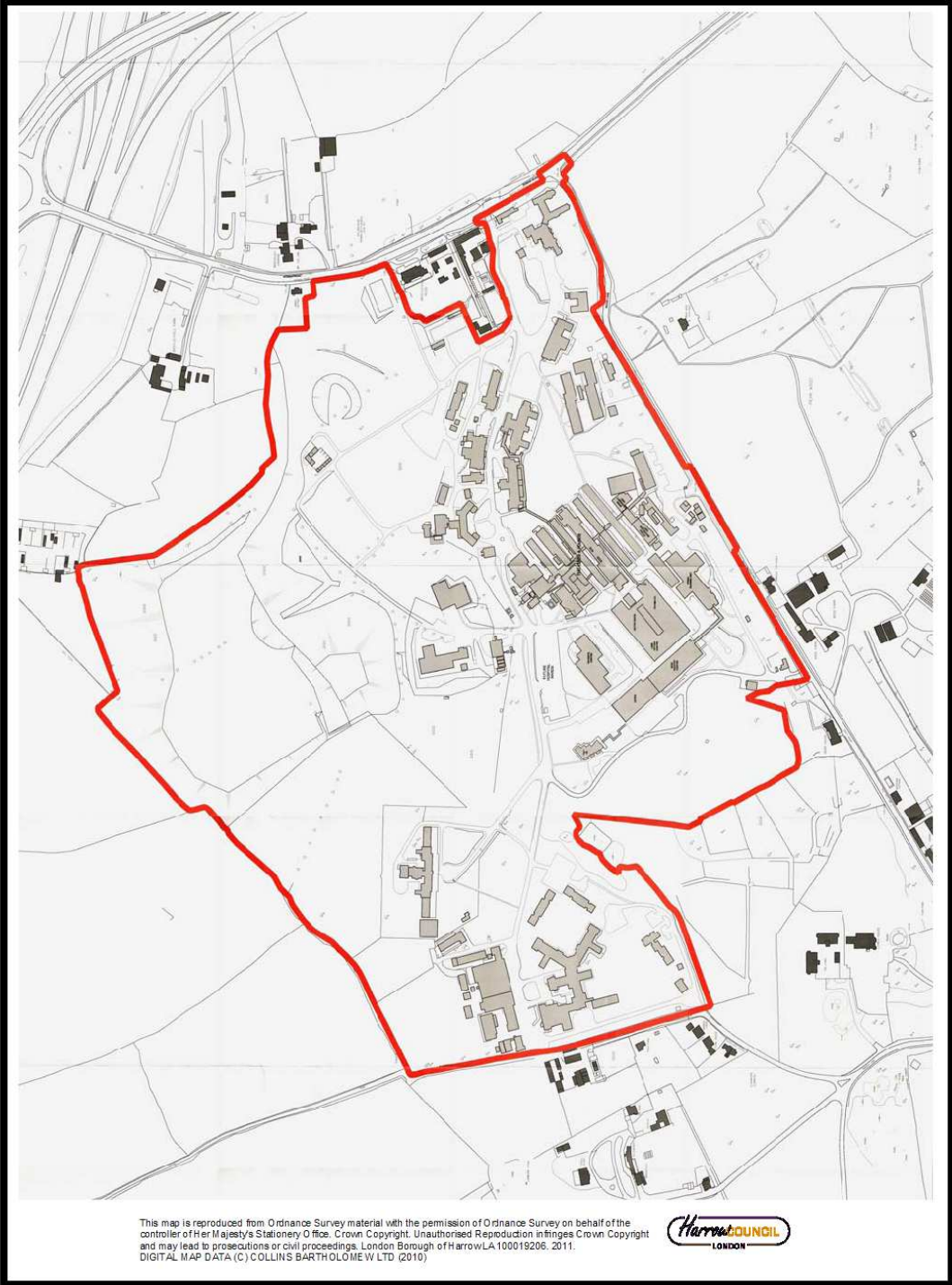
Outline Element - Plans for Approval:

001_P-LCN_Rev B Site Location Plan; 101204-D-786-Rev S CDZ Development Parameter Plan; 101204-D-789-Rev K CDZ Landscape Parameter Plan;

WDZ_PP_001_Rev J WZ Development Parameter Plan; WZ_PP_002_Rev G WZ Landscape Parameter Plan; EDZ_PP_001_Rev K EDZ Development Parameter Plan; EDZ_PP_002_Rev J EDZ Landscape Parameter Plan; 32-1011.01-J Tree Survey + Retention Renewal Plan; S1-32-1011.01-J Tree Survey + Retention Renewal Plan; S2-32-1011.01-J Tree Survey + Retention Renewal Plan; S3-32-1011.01-J Tree Survey + Retention Renewal Plan; Design Guidelines Revision A

Detailed Element - Plans for Approval:

50200267_U9022 Enabling Works Site Locations; 50200267_U9100 Key Plan; 50200267_U9000 Temporary Car park Layout ; 50200267_U9001 Road Vehicle Track; 50200267_U9002 Junction Vehicle Track; 50200267_U9003 Access Road Vehicle Track; 50200267_U9004 Access Road Vehicle Track; 50200267_U9005 Access Road Layout 50200267_U9006 Access Road Layout; 50200267_U9008 Estate Compound Layout; 50200267_U9009 demolition Site Plan; 50200267_U9010 Service Route & PH; 50200267_U9011 Temporary Car parks External; Lighting;50200267_U9012 Access Road Lighting Sheet 1; 50200267_U9013 Access Road Lighting Sheet 2; 50200267_U9014 Estates Compound Lighting ; 50200267_U9015 Access Road Sections; 50200267_U9018 Extent of Enabling Works; 50200267_U9019 Visibility Splays; 50200267_U9020 Task 1 Site Locations; 50200267_U9021 Temporary Car park details; U9024 REV A Typical Street Lighting Details; 2620-101B Enabling Works - Access Road and Car Park (1 of 2); 2620-102B Enabling Works - Access Road and Car Park (2 of 2); 2620-103B Enabling Works Temporary Car Park; 2620-104B Enabling Works Temporary Estates Compound; 50200267_U9007_F Aspire Buildings Access Road & Car park



SECTION 2 - OTHER APPLICATIONS RECOMMENDED FOR GRANT

None.

SECTION 3 - OTHER APPLICATIONS RECOMMENDED FOR REFUSAL

None.

SECTION 4 - CONSULTATIONS FROM NEIGHBOURING AUTHORITIES

None.

SECTION 5 - PRIOR APPROVAL APPLICATIONS

None.