

NORTHWOOD AND PINNER COTTAGE HOSPITAL

PLANNING STATEMENT

MARCH 2021



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APPENDIX 1.0 SITE LOCATION PLAN

1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement (“the Statement”) has been prepared by Montagu Evans LLP to assist with the determination of an application for planning permission at the Northwood and Pinner Cottage Hospital and Northwood Health Centre (referred to as ‘the Site’) submitted by NHS Property Services and NHS Hillingdon Clinical Commissioning Group (CCG). The application seeks permission for the partial demolition, refurbishment and extension of the existing Cottage Hospital, to provide a state of the art health centre, and the comprehensive redevelopment of the remaining site area to provide residential accommodation (Use Class C3). The application is submitted to the London Borough of Hillingdon (the Council) as the local planning authority.
- 1.2 The description of development is as follows:
- “Partial demolition, refurbishment and extension of the existing Cottage Hospital to provide a state of the art health centre and the comprehensive redevelopment of the remaining Site to provide residential (use class C3) accommodation and ancillary works including car parking, cycle parking, landscaping and associated works (phased).”*
- 1.3 The Applicant Site is situated within the jurisdiction of the London Borough of Hillingdon (LBH), to the north of Pinner Road, and comprises of a site area of approximately 1 hectare. A location plan showing the Site in the context of the surrounding area is included within this Application and is contained within **Appendix 1.0** of this Statement.
- 1.4 The Site subject to this full planning application comprises of two plots of land (Plot 1 and Plot 2), which are interconnected through a pedestrian path along the eastern boundary of Plot 1. Plot 1 which is located directly to the north of Pinner Road and comprises of the former Northwood and Pinner Cottage Hospital, which is locally listed. The Cottage Hospital is predominately vacant however part of the building is used as a rest spot for London Ambulance Service crew. Their departure from this Site has been discussed and agreed and this facility is proposed to be re-provided within Hillingdon Ambulance Station, Pinner Ambulance Station and Kenton Ambulance Station in modern, fit for purpose facilities.
- 1.5 Plot 2 is located to the north east of Plot 1 and comprises of the current Northwood Health Centre. The Northwood Health Centre is a single storey building which was built in the 1970s. The remainder of the Site comprises of hard standing, which provides parking for the health centre.
- 1.6 The proposed development includes the following :
- The retention, extension and refurbishment of the Locally Listed Northwood and Pinner Cottage Hospital to provide a state-of-the-art healthcare facility which responds to the identified need as proposed by the CCG;
 - The relocation of the Northwood Health Centre to the new state-of-the-art healthcare facility, which will provide 1,473 sqm of Healthcare floorspace (Use Class E);
 - The redevelopment of the remaining Site to deliver two high quality four storey residential blocks;
 - The delivery of 70 residential homes, which will comprise of a mix of unit sizes;
 - The provision of high quality landscaped private and communal amenity spaces for both the healthcare and residential elements of the scheme;
 - The provision of 69 car parking spaces, including 7 accessible spaces for the residential use and 52 car parking spaces, including 5 accessible spaces, for the healthcare facility; and
 - The delivery of policy compliant cycle parking provision for the residential accommodation and the healthcare floorspace.
- 1.7 The Proposal has been developed in consultation with the local community, officers at the Council and other key stakeholders as part of the pre-application consultation process. This has involved consultation on matters such as retention of the existing locally listed Cottage Hospital, design, layout, bulk, scale and massing, access and parking.
- 1.8 A suite of technical reports have been submitted as part of this planning application. The Planning Statement is one of those reports and provides a detailed planning policy analysis, considering the proposed development in light of the relevant policies of the adopted and emerging Development Plan, as well as other material considerations. As demonstrated by the

application documents it is not considered that the scheme gives rise to any adverse impacts when assessed against policy and guidance.

1.9 This Planning Statement demonstrates that the proposed scheme:

- Has evolved through extensive pre-application discussions with the Local Planning Authority (LPA) and key local stakeholders including the local community and key member groups;
- Optimises a previously developed Site to provide a new state-of-the-art Healthcare Centre and residential accommodation;
- Sensitively develops a locally listed building to bring the building back into full use, whilst ensuring its heritage value and setting is preserved and enhanced;
- Delivers a mix of unit sizes to address the needs to the local community and provides high quality residential accommodation;
- Delivers a high quality design which responds to the character of the surrounding area, whilst ensuring the most efficient use of the Site is achieved;
- Provides a quantum of development in terms of bulk, scale and massing that respects the surrounding area;
- Delivers high quality public realm throughout the Site through a high quality landscape strategy and seeks to green the Site through the delivery of new open spaces and green roofs; and
- Is on balance in accordance with relevant planning policy at national, regional and local level, and optimises sustainable development on this brownfield land.

2.0 INTRODUCTION

2.1 This Planning Statement ("the Statement") has been prepared by Montagu Evans LLP to assist with the determination of an application for planning permission at the Northwood and Pinner Cottage Hospital and Northwood Health Centre (referred to as 'the Site') submitted by NHS Property Services and NHS Hillingdon Clinical Commissioning Group (CCG). The application seeks permission for the partial demolition, refurbishment and extension of the existing Cottage Hospital, to provide a state of the art health centre (Use Class E), and the comprehensive redevelopment of the remaining site area to provide residential accommodation (Use Class C3). The application is submitted to the London Borough of Hillingdon (the Council) as the local planning authority.

2.2 The proposed description of development is as follows:

"Partial demolition, refurbishment and extension of the existing Cottage Hospital to provide a state of the art health centre and the comprehensive redevelopment of the remaining Site to provide residential (use class C3) accommodation and ancillary works including car parking, cycle parking, landscaping and associated works (phased)."

2.3 The Site subject to this full planning application comprises of two plots of land (Plot 1 and Plot 2), which are interconnected through a pedestrian path along the eastern boundary of Plot 1 (as shown in **Appendix 1.0**). In combination, the Plots comprise of a total site area of approximately 1ha. Plot 1 which is located directly to the north of Pinner Road, comprises of the former Northwood and Pinner Cottage Hospital, which is locally listed. The Cottage Hospital is predominately vacant however part of the building is used as a rest spot for London Ambulance Service crew. Their departure from this Site has been discussed and agreed and this facility is proposed to be re-provided within the Hillingdon Ambulance Station, Pinner Ambulance Station and Kenton Ambulance Station in modern, fit for purpose facilities. Plot 2 is located to the north east of Plot 1 and comprises of the current Northwood Health Centre. The Northwood Health Centre is a single storey building which was built in the 1970s. The remainder of the Site comprises of hard standing, which provides parking for the health centre.

2.4 Full details of the proposals are set out within the Design and Access Statement, and Application Drawings, prepared by Allies and Morrison, which forms part of this Application.

Overview of Scheme Proposals

2.5 The proposed development comprises of the following :

- The retention, extension and refurbishment of the Locally Listed Northwood and Pinner Cottage Hospital to provide a state-of-the-art healthcare facility which responds to the identified need as proposed by the CCG;
- The relocation of the Northwood Health Centre to the new state-of-the-art healthcare facility, which will provide 1,473 sqm of Healthcare floorspace (Use Class E);
- The redevelopment of the remaining Site to deliver two high quality four storey residential blocks;
- The delivery of 70 residential homes, which will comprise of a mix of unit sizes;
- The provision of high quality landscaped private and communal amenity spaces for both the healthcare and residential elements of the scheme;
- The provision of 69 car parking spaces, including 7 accessible spaces, for the residential use and 52 car parking space, including 5 accessible spaces, for the healthcare facility; and
- The delivery of policy compliant cycle parking provision for the residential accommodation and healthcare floorspace.

Consultation and Pre-Application Engagement

2.6 The Proposal has been developed in consultation with the local community, officers at the Council and other key stakeholders as part of the pre-application consultation process. This has included consultation on matters such as the retention of the existing locally listed Cottage Hospital, design, layout, bulk, scale and massing, access and parking.

- 2.7 Pre application discussions with the Local Planning Authority and key stakeholders were first undertaken back in 2018. Details of the Applicants engagement are set out within the accompanying Statement of Community Involvement, prepared by Cascade. This includes the War Memorial Trust. Following feedback from officers the proposed scheme evolved to reflect comments raised, including incorporating the retention of the locally listed building. Following this a further series of pre-application discussions with the LPA were undertaken between February 2020 and February 2021, during which time the scheme further evolved to reflect matters raised.
- 2.8 In addition to the formal LPA pre-application process the evolution of the scheme has also been supported through a public consultation which included webinar sessions with local residents and virtual meetings with local key stakeholder groups such as Northwood Hills Residents' Association and Northwood Residents' Association. These meetings have allowed matters and opportunities to be discussed, such as the proposed site layout, design, highways and landscaping.
- 2.9 A comprehensive summary of the pre-application consultation held to date and how the scheme has evolved in direct response to the feedback received is presented within the Design and Access Statement and the Statement of Community Involvement submitted as part of this Application.

Purpose and Format of the Planning Statement

- 2.10 The purpose of this Planning Statement is to provide information to allow the necessary consideration of the development against all relevant planning policy and all other material considerations in the determination of the application. It shows how all such considerations have been taken into account in the evolution of the scheme and the extent to which the scheme is compliant with all such considerations to help inform the overall planning balance judgement.
- 2.11 The Planning Statement forms part of the information which has been submitted with this application, and this should be read in conjunction with the following documents:
- Schedule of Application Documentation, prepared by Montagu Evans;
 - Application Covering Letter, prepared by Montagu Evans;
 - Planning Application Form, prepared by Montagu Evans;
 - Community Infrastructure Levy Form, prepared by Montagu Evans;
 - Site Location Plan, prepared by Allies and Morrison;
 - Schedule of Application Drawings, prepared by Allies and Morrison;
 - Application Drawings, prepared by Allies and Morrison;
 - Design and Access Statement, prepared by Allies and Morrison;
 - Heritage Statement, prepared by Allies and Morrison;
 - Planning Statement, prepared by Montagu Evans;
 - Energy and Sustainability Statement, prepared by Sweco;
 - Site Level Survey, prepared by ARA-Surveys;
 - Arboricultural Impact Assessment, prepared by Tamla Trees;
 - Landscaping Plans, prepared by Camlins;
 - Fire Strategy, prepared by Sweco;
 - Transport Assessment, prepared by RPS;
 - Travel Plan, prepared by RPS;
 - Noise Impact Assessment, prepared by RPS;
 - Flood Risk Assessment, prepared by Evolve;
 - Drainage Strategy, prepared by Evolve;
 - Land Contamination Report, prepared by PBA;
 - Financial Viability Assessment, prepared by Montagu Evans;
 - Air Quality Assessment and Air Quality Neutral Assessment, prepared by IDOM;
 - Ecological Impact Assessment, prepared by Tetrattech;
 - Sunlight and Daylight Assessment, prepared by Avison Young;
 - Statement of Community Involvement, prepared by Cascade;
 - Utilities Assessment, prepared by Sweco;

- Construction Waste Management Plan, prepared by Sweco; and
- Archaeological Statement, prepared by Cotswold Archaeology.

2.12 This Planning Statement demonstrates that the proposed scheme:

- Has evolved through extensive pre-application discussions with the Local Planning Authority (LPA) and key local stakeholders including the local community and key member groups;
- Optimises a previously developed Site to provide a new state-of-the-art Healthcare Centre and residential accommodation;
- Sensitively develops a locally listed building to bring the building back into full use, whilst ensuring its heritage value and setting is preserved and enhanced;
- Delivers a mix of unit sizes to address the needs to the local community and provides high quality residential accommodation;
- Delivers a high quality design which responds to the character of the surrounding area, whilst ensuring the most efficient use of the Site is achieved;
- Provides a quantum of development in terms of bulk, scale and massing that respects the surrounding area;
- Delivers high quality public realm throughout the Site through a high quality landscape strategy and which seeks to enhance the 'greening' of the Site through the delivery of new open spaces and green roofs; and
- Is on balance in accordance with relevant planning policy at national, regional, and local level and optimises sustainable development on this brownfield land.

3.0 SITE LOCATION AND DESCRIPTION

The Application Site

- 3.1 The Application Site is situated within the jurisdiction of the London Borough of Hillingdon (LBH). The Site is located to the north west of Northwood Hills Town Centre and comprises a site area of approximately 1 hectare. A location plan showing the Site in the context of the surrounding area is included within this Application and is contained within **Appendix 1** of this Statement.
- 3.2 The Site currently comprises of two interconnected plots of land, which are located to the north of Pinner Road. Plot 1 comprises of the former Northwood and Pinner Cottage Hospital, which is predominately vacant apart from the NHS Ambulance Service who occupies part of this Plot as a break service facility. The former Northwood and Pinner Cottage Hospital is a part two and part single storey building which is orientated on a North South axis. The former Northwood and Pinner Cottage Hospital was placed on LBH's Local List in 2010 and is designated as a Locally Listed Building. The Building is also listed on the National War Memorial Register, which identifies the existing wooden beam inside the building as an asset.
- 3.3 Plot 2 is located between Juniper Court, Waverley Gardens and Sovereign Court, to the north west of Plot 1. Plot 2 comprises of the current Northwood Health Centre, which is a single storey building dating from the 1970s. In addition to the Northwood Health Centre, the Plot also comprises an area of hard standing to the east which provides car parking for the health centre.
- 3.4 Vehicular access to the Site is currently via both Pinner Road and Neal Close. Access to Plot 1 is provided directly from Pinner Road, which bounds the Site to the south. Plot 1 can also be accessed from Neal Close, via Juniper Court, which is intended as part of the Application to be brought back into use. This provides both vehicular and pedestrian access. The vehicular access for Plot 2 is off Neal's Close with pedestrian access obtained from both Neal's Close and Waverley Gardens. In addition to this, a pedestrian path links both Plot 1 and Plot 2 along the eastern boundary of the Site.

Site Location

- 3.5 The Site is located approximately 350m to the north east of Northwood Hills Town Centre and approximately 1km to the west of Pinner Green. The surrounding area of the Site is predominately characterised by residential accommodation, however commercial uses are located to the south east of the Site within Northwood Hills Town Centre.
- 3.6 Plot 1 is bound to the north by an area of green space with Juniper Court, a three storey residential development beyond. Further north of this, predominately two to three storey residential units are located. To the north-east of Plot 1, Plot 2 is located. Pinner Road bounds Plot 1 to the south, with runs east to west providing connection between Pinner Green and Northwood. Beyond Pinner Road, two storey residential houses are located. To the west of Plot 1, two to three storey residential houses are also located.
- 3.7 With regards to Plot 2, the Site is bound to the north by Neal Close and to the north east by two to three storey residential accommodation within Neal Close. To the South of Plot 2 Sovereign Court is located, which is a three storey residential development. To the west, Juniper Court is located with Plot 1 to the south of this.
- 3.8 As set out above, the surrounding area is predominately characterised by residential accommodation with some commercial uses within the vicinity of the Site. Northwood School and Northwood Hills Library are located to the east of the Site, with commercial town centre facilities located to the south east.
- 3.9 The Site is located within Flood Zone 1, an area which benefits from a low probability of flooding. The Site is not located within a Conservation Area nor does it contain any statutory listed buildings. The closest Statutory Listed Building, Tooke's Folly at Pinner Hill Farm, Grade II listed, is located approximately 1.15km to the west of the Site. The Northwood and Pinner Cottage Hospital was entered onto the Council's Local List in 2010. The Building is also on the National War Memorial Register.

- 3.10 The Site is subject to a PTAL rating of 1b and 2, out of 6, which demonstrates that the Site does not benefit from high levels of accessibility. Notwithstanding this, the Site is located approximately 500m to the north west of Northwood Hills Tube Station, which is serviced by the Metropolitan Line. From Northwood Hills Tube Station connections can be obtained between Aldgate, Amersham, Baker Street, Chesham, Watford and Harrow-on-the-Hill. Regular bus services are located on Pinner Road, which adjoins the Site to the south. Bus routes 282 and H11 provide connection between Northwood, Harrow and Hanwell from Pinner Road.
- 3.11 As identified on the Council's Protected Trees Map, Plot 1 is subject to a Tree Preservation Order under reference: TPO 542, which covers the majority of the Site (with the exclusion of the northern boundary).

Planning History

- 3.12 A planning history search of LBH's available online planning records (up to 2000) has been undertaken and the following applications are of relevance to this application:
- An Application was withdrawn in December 2003 under ref:44988/APP/2003/917 for the erection of a three storey primary care centre (Class D1) with ancillary parking and landscaping. The Proposed Development also included the demolition of the existing clinic and premises;
 - Planning permission was refused on 18 May 2004 under ref: 44988/APP/2004/836 for the redevelopment of the existing health care centre to provide a part single storey, part two storey, part three storey building for the purpose of a health centre and eight residential flats at third floor. This decision was appealed by the Applicant and later withdrawn from the appeal process in May 2005; and
 - An Application was withdrawn on the 5th December 2012 for the part change of use from Use Class D1 (Non-residential Institutions) to Use Class A1 (Shops) for use as a pharmacy, involving the installation of dispensing hatch to the front (ref:44988/APP/2012/3022).

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 1.0** of this Statement, the Application proposes:

- The retention, extension and refurbishment of the Locally Listed Northwood and Pinner Cottage Hospital to provide a state-of-the-art healthcare facility which responds to the identified need as proposed by the CCG;
- The relocation of the Northwood Health Centre to the new state-of-the-art healthcare facility, which will provide 1,473 sqm of Healthcare floorspace (Use Class E);
- The redevelopment of the remaining Site to deliver two high quality four storey residential blocks;
- The delivery of 70 residential homes, which will comprise of a mix of unit sizes;
- The provision of high quality landscaped private and communal amenity spaces for both the healthcare and residential elements of the scheme;
- The provision of 69 car parking spaces, including 7 accessible spaces, for the residential use and 52 car parking space, including 5 accessible spaces, for the healthcare facility; and
- The delivery of policy compliant cycle parking provision for the residential accommodation and healthcare floorspace.

Demolition

4.2 This Application proposes a total of 1,702.2 sqm of demolition across the Site. The proposal seeks to demolish the existing Northwood Health Centre within Plot 2, which comprises approximately 960.9 sqm (GIA) of Healthcare floorspace (Use Class E, formerly Use Class D1). With regards to Plot 1 and the Northwood and Pinner Cottage Hospital specifically, the proposal seeks to sensitively demolish parts of the building which are in a poor state of repair, with signs of subsidence, and are later, more modern extensions and alterations. Demolition has therefore been restricted to later accretions or part of the building which do not contribute to its architectural significance.

4.3 Further details of the proposed demolition are contained within the accompanying Design and Access Statement.

Refurbishment and Extension – Northwood and Pinner Cottage Hospital

4.4 As set out above, this application seeks planning permission for the refurbishment and extension of the existing Cottage Hospital. The extent of demolition has been set out above.

4.5 New extensions to the Building are located on the eastern elevation and provide tailored and more efficient healthcare floorspace. The East Wing extension at the northern end of the building will create a boundary between the healthcare use and the rest of the Site, further acting as a book-end to the Building. The proposal further seeks permission for the extension to the existing Middle East Wing to improve the visibility of the Building from Pinner Road. This will also provide an enhanced entrance route into the building and will improve the visitor experience.

4.6 In addition to the extension set out above, the scheme proposes sensitive infill extensions on the western elevation of the Cottage Hospital. These infill extensions are proposed to replace a number of the single storey additions which are to be demolished. The new infills will provide architectural coherence to the western elevation and enable a more usable ground floor to be delivered.

4.7 The extent of the proposed extensions and infill is depicted within the accompanying Design and Access Statement.

4.8 With regards to the proposed refurbishment to the existing Cottage Hospital, the scheme seeks to relocate the entrance of the Cottage Hospital to its original location. The existing retained fabric will be repaired and cleaned to improve both its appearance and thermal performance of the building. The existing single glazed timber windows on both the southern and eastern elevation of the building will be replaced with new double-glazed windows that match the appearance of the existing where feasible.

Layout and Scale – New Residential Accommodation

- 4.9 The proposal seeks permission for the erection of two residential blocks (Block A and Block B) which comprise of four storeys of accommodation. Block A will be located within Plot 1, to the east of the refurbished health centre. Block A has been positioned to be set back approximately 30m from Pinner Road to ensure that the setting of the Cottage Hospital is retained. The positioning of Block A has also been designed to ensure maximum distances are achieved between the Cottage Hospital, the new residential accommodation on the Site, Juniper Court to the north, Neal Close to the east of the Site and Sovereign Court also to the east.
- 4.10 Block B is located within Plot 2 which is located within the western part of the Site. The position of Block B has been centralised within the Plot to ensure sufficient distances are retained between the new built form and the surrounding residential accommodation. The positioning of Block B broadly aligns with the footprint of the existing Healthcare building, which again seeks to ensure a positive relationship is delivered between the accommodation block and the surrounding built form.
- 4.11 A high quality landscaping scheme will also be delivered throughout the proposal. The scheme proposes high quality amenity space for both the health centre and residential accommodation.

Residential Accommodation

- 4.12 The provision of 70 residential homes, as set out above, will come forward in two four storey accommodation Blocks (Block A and Block B). Block A will comprise of 32 residential units, with Block B delivering 38 residential units. In combination, the proposal will deliver a mix of units. The below provides a breakdown of the proposed unit mix:
- 31 x 1 Bedroom Units (44%);
 - 34 x 2 Bedroom Units (49%); and
 - 5 x 3 Bedroom Units (7%).
- 4.13 All the residential units will meet Nationally Described Space Standards.
- 4.14 The provision of affordable housing within the scheme will be subject to viability and ongoing discussions with the LBH.

Residential Amenity Space

- 4.15 The scheme seeks to deliver a total of 2,070 sqm of amenity space in the form of both private and communal space, which exceeds the Local Plan requirements of 1,620 sqm.
- 4.16 939 sqm of private amenity space is provided across both Blocks A and B. All residential units will have access to private amenity in the form of either a balcony or a ground floor patio.
- 4.17 In addition to the above, the scheme proposes 1,131 sqm of shared communal amenity space in the form of both communal courtyards and roof terraces. These spaces will be fully accessible to wheelchair users, overlooked by residents for casual surveillance and designed to take advantage of direct sunlight.

Children Play Space

- 4.18 In addition to the above, the scheme proposes 280 sqm of dedicated children play space. This will be brought forward in the form of both doorstep playable space and local playable space. 140 sqm of doorstep playable space is provided in the landscape design of the roof terraces of both plots and also in the communal amenity area. The local playable space (140 sqm) which is envisaged for children aged up to 11 years will be provided in the two communal courtyards where playable landscaping features will be incorporated into the design.

Healthcare Amenity Space

- 4.19 Three Health Centre Gardens are proposed as part of this Application which will be located to the west of the retained Cottage Hospital. The Health Centre Gardens will be designed to serve different purposes and as such will be characterised differently. The Memorial Garden will be a semi-public open space and will incorporate a staff entrance. A low hedge perimeter, planting beds and a specimen tree are envisaged for the space. The cycle stands for the staff are also proposed to be provided in this space.
- 4.20 The Entrance Garden will be located around the entrance porte-cochere of the Health Centre. This space will provide an area of outdoor waiting space for the users of the Health Centre. A seating area is to be provided in this area. Finally, the Sanctuary Garden is enclosed and contained within the Health Centre environment. This is envisaged to be used by staff and children during or after their consultation. Informal play features are proposed in this Garden.

Car Parking

- 4.21 The Proposed Development will provide a total of 121 car parking spaces. The parking will be arranged in three zones across the Site. 69 car parking spaces will be provided for the residential accommodation, of which 7 will be designed as blue badge holder spaces. All residential car parking spaces, with the exception of 3 accessible parking spaces located near the entrance of Block A, will be located within Plot 2. The parking spaces located in Plot 2 will be accessed directly from Neal Close.
- 4.22 A total of 52 car parking spaces will be provided for the healthcare use on the Site. This includes the provision of 5 spaces designed as blue badge holder spaces. The parking assigned for the healthcare use will be located across two parking zones. Visitor parking will be located along the Site boundary of Pinner Road and will be predominately accessed via Pinner Road. 33 dedicated spaces have been provided for visitor parking. It should be noted however that two of the blue badge spaces will be accessed from Juniper Close. For the staff associated with the new health centre 19 dedicated car parking spaces will be provided. These are again accessed via Juniper Close.
- 4.23 Further details of the proposed car parking are contained within the accompanying Transport Statement, prepared by RPS.

Cycle Parking

- 4.24 The scheme will deliver a total of 131 cycle parking spaces across the scheme. 20 cycle parking spaces will be provided for the Healthcare Centre. This provision will comprise of both long and short stay spaces, with 10 spaces provided as Sheffield stands which are capable of accommodating large, adapted cycles.
- 4.25 For the residential element, 111 cycle spaces will be provided. This will comprise of two short stay spaces and 109 long-stay spaces which will be secure, covered and accessible. The cycle parking will be distributed between Block A and Block B in line with the number of units provided within each.
- 4.26 Further details of the proposed cycle parking are contained within the accompanying Transport Statement, prepared by RPS.

Access & Servicing

- 4.27 Pedestrian and cycle access to the proposed healthcare centre and Block A will remain as per the existing arrangement which provides access from the north side of Pinner Road. A new pedestrian and cycle access will also be provided from Juniper Court. With regards to Block B, the proposed pedestrian and cycle access to the Plot will remain as per the existing situation, where access to this Plot is from the south side of Neal Close and the western extent of Waverley Gardens. In addition, a new pedestrian access route will be provided from Pinner Road to Block B.
- 4.28 With regard to vehicular access, vehicular access to the proposed healthcare centre will be provided from two locations. Visitor vehicle access will be obtained from the existing access points located on the northern side of Pinner Road. Staff vehicle access will be taken from the southern side of Neal Close, via the access road from Juniper Close. Emergency vehicle access will also be provided to the west of the proposed healthcare centre and will be restricted to emergency vehicles only.

- 4.29 With regards to vehicular access to the residential blocks, this again will be provided from two locations. Vehicle access will be taken from the existing access points located on the northern side of Pinner Road and the southern side of Neal Close.
- 4.30 Further details of the proposed access and servicing arrangements for the Site are contained within the accompanying Transport Statement, prepared by RPS and the Design and Access Statement prepared by Allies and Morrison.

Landscaping

- 4.31 This application proposes a high quality landscaping scheme for the Site which focuses on creating a pedestrian dominated public and private environment. The proposed scheme has been designed to retain as many of the Site's trees as possible and where the loss of trees is proposed, high quality replacements have been identified. In addition, the proposed landscaping scheme seeks to create a high quality street frontage along Pinner Road. This will be achieved through the provision of new street trees and a clipped hornbeam hedge, and through the delivery of a new dedicated visitor route from Pinner Road to the facility. In combination, this ensures a high quality landscaped, welcoming experience is provided for the users of the healthcare. Three landscaped gardens are proposed for use by the health centre. The individual gardens have been designed to serve different purposes, including spaces for both visitors, patients and staff members to use.
- 4.32 Two residential communal gardens are also provided within the Proposed Development, which are located within proximity to Blocks A and B. These gardens will accommodate dedicated playspace provision for 0-11 year olds. The Scheme in total provides 280 sqm of playspace, which is divided between high quality doorstep play and playable spaces.
- 4.33 Further details of the proposed landscaping strategy for the Site is set out within the accompanying Landscaping Plans, prepared by Camlins, and the Design and Access Statement, prepared by Allies and Morrison.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 This Application has been informed by the adopted Development Plan policies and other relevant guidance. This section of the Statement provides a summary of the planning context from which such policy is drawn. **Section 6.0** then provides an assessment of the application against the policies and guidance contained within these documents.

Statutory Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the Statutory Development Plan, unless material considerations indicate otherwise.
- 5.3 The key consideration, therefore, in the determination of the planning application is the Development Plan with other material considerations being relevant as appropriate, including the guidance contained within the Framework. The weight to be attributed to the policies identified in the Development Plan will depend upon the consistency they have with the Framework.

National Framework

- 5.4 The revised National Planning Policy Framework (the "NPPF") was published on 19 February 2019. The NPPF sets out the Government's approach to planning matters, and is a material consideration in the determination of planning applications.
- 5.5 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through decision-taking (paragraph 11), and goes on to state that:

"For decision taking this means:

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

- 5.6 In March 2014, the Government published the Planning Practice Guidance ("PPG") which is a material consideration in relation to planning applications. The PPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level. The PPG is a material consideration in the determination of applications and is regularly updated.

The Development Plan

- 5.7 The Statutory Development Plan for the Site comprises of the following documents:
- The London Plan (2021);
 - The LBH Local Plan Part 1 – Strategic Policies (November 2012); and
 - The LBH Local Plan Part 2 – Development Management Policies and Site Allocations and Designations (January 2020).

Emerging Policies

- 5.8 The Mayor of London and LBH have recently adopted their respective Plans and both the Mayor of London and LBH are not in the process of producing any new development plan documents of relevance at this time.

Material Considerations

Regional Guidance

5.9 The Greater London Authority (GLA) have published a number of supporting documents that are of relevance in the consideration of this Application. Of particular relevance are:

- Accessible London, Achieving an Inclusive Environment (October 2014);
- The control of dust and emissions during construction and demolition (July 2014);
- Sustainable Design and Construction (April 2014);
- Affordable Housing & Viability (August 2017); and
- Housing (March 2016).

Local Guidance

5.10 The LBH have also adopted a Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) to provide greater detail on their strategic policies. These comprise of:

- Planning Obligations SPD (July 2014); and
- Accessible Hillingdon SPD (September 2017).

Application Site Specific Designations

5.11 Under the Councils adopted Development Plan, the Site does not benefit from any policy designations. Whilst the Site does not fall within any designation as identified on the adopted Policies Map, as set out above, the Site is subject to a Tree Preservation Order and contains a Locally Listed Building.

6.0 PLANNING APPRAISAL

- 6.1 This Section of the Statement assesses the component parts of the Proposed Development against the statutory development plan and other material considerations as outlined in Section 5.

Principle of Improved Health Care Facilities

- 6.2 A central aspect of the NPPF is the promotion of healthy communities. Paragraph 92 states that planning decisions should plan for local services that enhance the sustainability of communities and residential environments.
- 6.3 Policy S1 (Developing London's Social Infrastructure) of the London Plan states that development proposals that provide high quality, inclusive social infrastructure which address a local or strategic need and support service delivery strategies should be supported. The Policy further states that development proposals which seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
- 6.4 The Policy further requires new facilities to be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- 6.5 Furthermore Policy S2 (Health and Social Care Facilities) of the London Plan states that development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new model of care should be supported. These facilities should be easily accessible by public transport, cycling and walking.
- 6.6 At a local level, Strategic Objective SO3 of the Local Plan Part 1 identifies that the Council will seek to improve the quality and accessibility of health care facilities. Policy CL1 (Community Infrastructure Provision) of Local Plan Part 1 further states that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of existing and future populations. This will be achieved through supporting the retention and enhancement of existing community facilities and providing facilities which are accessible and inclusive to all potential users.
- 6.7 Furthermore, Policy DMC2 (New Community Infrastructure) of the Local Plan Part 2 further states that proposals for the refurbishment and re-use of existing premises for community facilities will be supported.
- 6.8 This Application seeks planning permission for the retention, refurbishment and extension of the existing Cottage Hospital to provide a state-of-the-art HealthCare Centre. The new facility will accommodate both the existing Northwood Health Centre and provide accommodation for two GP surgeries and Community Services Rooms. The new Community Service Rooms will deliver services for the community including a new baby clinic and mental health clinics. The proposed new Health Care facility has evolved through detailed discussions with the CCG and existing clinical providers to understand the need and demand for facilities in the locality of the Site. The proposal will therefore provide a modern fit for purpose Health Centre, which will contain facilities and provide services to meet the needs and demands of patients.
- 6.9 The Scheme proposes a total of 1,473 sqm of Healthcare floorspace (Use Class E), which results in an increase of approximately 512 sqm in comparison to the existing Northwood Health Centre. The existing vacant Cottage Hospital has been vacant for over 10 years and have not been utilised for its original purpose since this point. Whilst it is recognised that the Cottage Hospital has served its function and its current layout is inefficient and does not meet the needs of today's healthcare facilities, the CCG and the local NHS Providers are committed to restoring the building and as such the heritage value on the Site through bringing the building back into use. To achieve this however and ensure the refurbished Cottage Hospital meets the needs of the population, partial demolition of the building and the reconfiguration of the floorplan is required. As a consequence of this, the Site results in an overall loss of floorspace of approximately 1,510 sqm.
- 6.10 Notwithstanding the above, the Proposed Development seeks to bring back into use a locally listed building which is fit for purpose as a healthcare provision that meets the needs of the population. The new Cottage Hospital will provide purpose built and modern floorspace which can adapt and respond to the changing healthcare needs of the population. The redevelopment of the Site also accords with the health commissioning strategy and the loss of floorspace has been

confirmed as acceptable by the CCG in light of a new high quality useable development. As such, it is considered that the Proposed Development provides an additional 512 sqm of useable and high quality healthcare floorspace for the Borough.

- 6.11 The provision of improved facilities at Northwood is further in line with the NHS's Strategy which seeks to bring services closer to home, through the integration of care organisations and the establishment of Primary Care Networks within the heart of the Community. The Proposed Development on this Site will deliver this through providing 'triple integration' of services which includes primary and specialist care, physical and mental health services and health with social care. This will enable the Health Centre to provide a number of services to the local community, in the community.
- 6.12 Furthermore, as part of the Healthcare Estate Strategy for Hillingdon, which is in the process of being refreshed by NHS Hillingdon CCG, it is identified that there is a continual need for a new health centre in Northwood and Pinner. The redevelopment of the Cottage Hospital and the relocation of the Northwood Health Centre to this facility has been identified as one of three hubs which will assist Hillingdon in delivering their Estate Strategy, which includes supporting the refurbishment of Mount Vernon and a new Hillingdon Hospital.
- 6.13 The principle of healthcare floorspace on this Site has been established in light of the existing healthcare uses which currently exist on the Site. Notwithstanding this, the enhancement of the healthcare floor space aligns with both London Plan and Local Plan policies which seek to retain and enhance community uses such as healthcare facilities. In accordance with Policy SC1 of the London Plan, the Proposal seeks to make the best use of land whilst also contributing to achieving LBH's housing requirements.
- 6.14 In light of the above, the provision of a state-of-the-art Health Centre on this Site and the relocation of the existing services to a new high quality, fit for purpose facility is considered to accord with the policy requirements set out above.

Principle of Residential Development

- 6.15 Housing delivery is a key objective of the NPPF and it advocates for sufficient amount and variety of land to come forward to significantly boost the supply of housing (paragraph 59).
- 6.16 Paragraph 67 of the NPPF also requires local planning authorities to ensure that planning policies identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability. There is a specific requirement for local planning authorities to maintain a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirement, and developable sites or broad locations for 6-15 year's growth. An appropriate buffer should be included to ensure choice and competition in the market (paragraph 73).
- 6.17 Paragraph 68 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 6.18 The proposed Site is a previously developed Brownfield Site and Paragraph 118 of the NPPF states that '*Planning policies and decision should [...] give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*'
- 6.19 On the 6th August 2020, the Government published a White Paper setting out proposals for the reform of the Planning System in England which was titled "Planning for the Future". The White Paper seeks to create a planning system which is simpler, quicker to navigate and that delivers results quicker. The 2020 White Paper places great focus on the delivery of housing and identifies a national housebuilding target of 300,000 new homes annually. The White Paper also places emphasis on a need for greater land release to achieve these targets.
- 6.20 London Plan Policy H1 (Increasing Housing Supply) states that to ensure Local Planning Authorities achieve their 10 year housing targets, boroughs should prepare delivery-focused development plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, encourage the development on other appropriate windfall sites and enable the delivery of housing capacity. The Policy further states that Boroughs should also seek to optimise the potential for housing delivery on all suitable and available brownfield sites.

- 6.21 Table 4.1 of the London Plan identifies a ten year housing target for the LBH of 12,850 units. This equates to an annual requirement of 1,285 residential units.
- 6.22 At a local level, Policy H1 (Housing Growth) of the Local Plan Part 1 states that the Council will meet and exceed its minimum strategic housing requirement, where this can be achieved, in accordance with other Local Plan policies. The Borough's current housing target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021. The Policy further states that rolling forward to 2026, this target equates to a minimum provision of 6,375 dwellings over the period of Hillingdon Local Plan Part 1. The Council's housing targets will be achieved through ensuring that development makes the most efficient use of brownfield land, promotes high quality mixed use development and through promoting the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the Borough.
- 6.23 This application seeks to deliver 70 residential units (Use Class C3), which will come forward within two, four storey flatted blocks. The Proposed Development will deliver a mix of units and will specifically contribute to the delivery of housing within the LBH. The principle of residential accommodation on this Site has been supported by Officer's at the Council during pre-application engagement.
- 6.24 Whilst it is acknowledged that as of December 2019 the Council can demonstrate a five year housing land supply (6.22 years) the introduction of the new London Plan increases LBH's housing target. Within the recently adopted London Plan, the LBH ten year housing target has increased to 12,850 units or 1,285 units per annum, which is a significant increase from the housing target of 425 dwellings per annum as set out in LBH Local Plan Part 1.
- 6.25 The delivery of 70 units therefore will go towards ensuring that the LBH continue to achieve their annual and strategic housing targets. Through the granting of this permission there can be increased certainty that the scheme will come forward with additional homes, thus mitigating any sites within the current five year supply which may not come forward for unforeseen circumstances or indeed future challenges that may arise as a result of the increased housing pressure, as set out above, the Council will face. It is clear that the housing targets for the LBH have significantly increased and as such, the Council will need to ensure the best use of land is delivered to ensure these targets can be achieved. In light of the Council's increased housing target within the London Plan and the Government's Standard Housing Need Methodology, the delivery of this Site will help support the Council in ensuring that current and future targets are met.
- 6.26 The introduction of residential accommodation at this location is considered appropriate in light of the Site's surrounding character. As set out in this Statement, the surrounding area is predominately characterised by residential accommodation and as such, the introduction of additional residential accommodation in this location further accords with the residential context of the Site.
- 6.27 The proposed introduction of residential accommodation at this location therefore accords with national, regional and local planning policy and would deliver a quantum of units which are appropriate given the Council's increasing housing need, the Site's position within a sustainable residential location and the national drive to optimise previously developed land.

Housing Mix

- 6.28 Paragraph 61 of the NPPF requires a range of size, type and tenure of housing, including affordable housing, families with children, older people and students to reflect the needs of different groups within the community.
- 6.29 London Plan Policy H10 (Housing Size Mix) states that schemes should consist of a range of unit sizes. The Policy states that to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision makers should have regard to:
- 1) *Robust local evidence of need where available, or where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment;*
 - 2) *The requirement to deliver mixed and inclusive neighbourhoods;*
 - 3) *The need to deliver a range of unit types at different price points across London;*
 - 4) *The mix of uses in the scheme;*
 - 5) *The range of tenures in the scheme;*

- 6) *The nature and location of the site, with higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity;*
- 7) *The aim to optimise housing potential on sites;*
- 8) *The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock; and*
- 9) *The need for additional family housing and the role of one and two bed units in freeing up existing family housing.*

6.30 At a local level, Policy DMH 2 (Housing Mix) of the Local Plan Part 2 states that the Council will require the provision of a mix of housing units of different sizes to reflect the Council's latest information on housing need. The accompanying text to Policy DMH 2 states that the latest housing needs for the Borough identifies that there is a need for larger affordable and provide market units, particularly three bedroom properties. The LBH Strategic Housing Market Assessment (October 2018) further identifies that there is a need for larger two and three bedroom units within the Borough.

6.31 The Scheme seeks to deliver the following housing mix:

- 31 x 1 bedroom units (44%);
- 34 x 2 bedroom units (49%); and
- 5 x 3 bedroom units (7%).

6.32 Whilst it is noted that the adopted Local Plan does not prescribe a required mix of residential development, the adjoining text and Strategic Housing Market Assessment does identify a need for larger units. The proposed housing mix has been formulated in consideration of the character of the development and the Council's most up to date housing requirement and up to date market information. The proposed unit mix comprises of a mix of unit sizes and comprises of an element of three bedroom units. Given that the Proposed Development comprises of solely flatted accommodation, a unit mix which is weighted towards one and two bedroom units is considered to be appropriate in light of the character of the development. In line with the requirement of both Local Plan Policy DMH2 and London Plan Policy H10 the proposed unit mix seeks to establish a mixed and inclusive neighbourhood through the delivery of a range of unit types. Notwithstanding the Site's PTAL rating, it is further considered that the proposed unit mix is appropriate in light of the Site's accessibility and proximity to key facilities and transport hubs such as Northwood Hill Tube Station.

6.33 In summary it is considered that the proposed unit mix addresses both the aims of the London Plan and Local Plan, which seeks to ensure an appropriate mix of units is delivered, whilst delivering an element of larger family accommodation that is reflective of the nature of the Proposed Development.

Residential Density

6.34 Paragraph 123 of the NPPF sets out that *'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.'*

6.35 Policy GG2 (Making the Best Use of Land) of the London Plan states that in order to create successful sustainable mixed-use places, development proposals must proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development in locations that are well-connected by public transport, walking and cycling. The Policy further states that this will be achieved through enabling development of brownfield land. The optimum development capacity of a Site should be determined through applying a design-led approach.

6.36 Policy D3 (Optimising Site capacity through the design-led approach) further requires all development to make the best use of land following a design-led approach that optimises the capacity of sites, including site allocations. The Policy further states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

6.37 At a local level, the accompany text to Policy H1 (Housing Growth) of Local Plan Part 1 states that the Council's housing targets will be achieved through promoting the design and density of new homes to reflect the specific and different land use characteristics in the north and south of the Borough.

- 6.38 Furthermore, Policy DMHB 17 (Residential Density) of the Local Plan Part 2 requires all need residential development to take account of the Residential Density Matrix contained within Table 5.2 of the Plan. Table 5.2 identifies an appropriate density range for the Scheme, of 50-110 units per hectare, in light of the Site's PTAL rating of 2 and location within 800m of a town centre.
- 6.39 As set out above, the scheme proposes to deliver 70 residential units on a Site which measures approximately 1ha. It should be noted however that part of the Site consists of the refurbished Northwood and Pinner Cottage Hospital. The Proposed Development therefore sits comfortably (approximately 88 units per hectare) within the above density range set out within the adopted Local Plan. Notwithstanding the Local Plan density requirements, the recently adopted London Plan places emphasis on ensuring that developments make the most efficient use of land, with a focus on locating high quality high density development within sustainable locations.
- 6.40 It is also important to note that density is one measure of assessing design. Design quality is also a key factor and weight should be given to this and other significant benefits when assessing the density of the Scheme. The proposed density of the scheme has been carefully developed and established through a design-led approach in line with the requirements of the London Plan. The scheme has also evolved through extensive pre-application discussions with key stakeholders including Officers and Local Residents.
- 6.41 The proposed density of the development has been carefully considered to ensure that both the most efficient use of the land is achieved, whilst ensuring the scheme delivers a high quality development which is reflective of the Site's character and surrounding area. The scheme has been carefully designed to optimise its development potential as required by both the NPPF, The London Plan and the Local Plan. The scale of the development and resulting density is a function of an appropriate design response to the Site context and having regard to the local context, design, and site accessibility whilst making the most efficient use of land.

Affordable Housing

- 6.42 The NPPF advocates the need for Local Planning Authority to be flexible in the application of planning obligations to ensure that schemes are not at risk of being delayed or abandoned. Paragraph 62 of the NPPF requires Planning Policies to specify the type of affordable housing required and set policies for meeting this need on site, unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and it can be agreed that this approach contributes to the objective of creative mixed and balanced communities.
- 6.43 London Plan Policy H4 (Delivering Affordable Housing) identifies a strategic target of 50% of all new affordable homes delivered across London to be genuinely affordable. This will be achieved through requiring major developments, which trigger affordable housing requirements, to provide affordable housing through the threshold approach.
- 6.44 London Plan Policy H5 (Threshold approach to applications) states that the threshold level of affordable housing on gross residential development is initially set at:
- 1) *a minimum of 35 per cent; or*
 - 2) *50 per cent for public sector land where there is no portfolio agreement with the Mayor; or*
 - 3) *50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.*
- 6.45 The Policy further states that to benefit from the Fast Track Route applications must meet all the criteria including meet or exceed the relevant threshold level of affordable housing, be consistent with relevant tenure split, meet other relevant policy requirement and demonstrate that the strategic 50% target has been taken account of.
- 6.46 At a local level, Policy H2 (Affordable Housing) of the Local Plan Part 1 states that housing provision is expected to include a range of housing to meet the needs of all types of households and the Council will seek to maximise the delivery of affordable housing from all sites over the period of the Hillingdon Local Plan Part 1 (2012-2026). For all sites with a capacity of 10 or more units, the Council will seek to ensure that the affordable housing mix reflects housing needs in the Borough, particularly the need for larger family units.

- 6.47 Furthermore Policy DMH 7(Provision of Affordable Housing) of the Local Plan Part 2 states that on all sites capable of delivering 10 or more units will be required to maximise the delivery of on-site affordable housing. Subject to viability and if appropriate in all circumstances, a minimum of 30% of all new homes on sites of 10 or more units should be delivered as affordable housing. This should include a tenure split of 70% Social/Affordable Rent and 30% Intermediate.
- 6.48 In accordance with Regional and Local Policy, a Financial Viability Appraisal has been submitted as part of this planning application to support the applicant's approach to affordable housing provision in the context of the need to provide a new Health Centre in this location.

Housing Quality

- 6.49 London Plan Policy D6 (High quality and standards) requires housing developments to be of the highest design quality and provide adequately-size rooms with comfortable and function layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. The Policy requires development to meet the minimum standards set out below, which will be applied to all tenures and residential accommodation that is self-contained. The minimum standards set out below also align with the Nationally Described Space Standards.

Table 5: Table 3.1 of the London Plan – Minimum Space Standards for New Dwellings					
		Minimum gross internal floor areas and storage (square meters)			
Number of bedrooms	Number of bed spaces	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37)			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4
	8p	125	132	138	

- 6.50 At a local level, Policy DMHB 16 (Housing Standards) of the Local Plan Part 2 requires all housing development to have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this, residential accommodation should meet or exceed the most up to date internal space standards.
- 6.51 All the residential units within the Proposed Development will meet or exceed the minimum space standards as set out by both the Mayor of London within the London Plan and the National Technical Standards (2015). This ensures that a high quality living environment is delivered as part of the development.
- 6.52 Furthermore, London Plan Policy D7 (Accessible Housing) states that at least 10 per cent of dwellings should meet Building Regulation required M4 (3) 'Wheelchair user dwellings' and all other dwellings should meet M4 (2) 'accessible and adaptable dwellings'. This requirement is also reflected in Policy DMHB 16 (Housing Standards) of the Local Plan Part 2 which requires major developments to provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users. The Proposed Development will deliver a total of 7 M4 (3) units across the two residential blocks and therefore aligns with the policy requirements set out above. The remaining units will meet Building Regulations M4(2).

Design

- 6.53 High quality and inclusive design is encouraged at all policy levels. The NPPF notes that good design is a key aspect of sustainable development and plays a crucial role in promoting better places for people. Paragraph 127 of the NPPF states that planning policies and decision makers should ensure that developments:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

- 6.54 Paragraph 131 outlines that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.55 Chapter 3 of the London Plan reinforces the Mayor’s commitment to ensuring the delivery of good quality designed developments, which reflect and respond to London’s character. Policy D1 (London’s form, Character and Capacity for growth) requires developments to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality. Further, Policy D5 (Inclusive Design) requires developments to deliver inclusive environments that meet the needs of all Londoners.
- 6.56 At a local level, Policy BE1 (Built Environment) of the Local Plan Part 1 states that the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. The policy further requires all new developments to ensure that they achieve a high quality of design in all new buildings, be designed to the identity and context of Hillingdon’s buildings and make a positive contribution to the local area in terms of layout, form, scale and materials and improve the quality of the public realm and provide for public and private places which are attractive, safe and functional.
- 6.57 Policy DMHB 11 (Design of New Development) of the Local Plan Part 2 further requires all new developments to be designed to the highest standards and should incorporate principles of good design. This should include the harmonisation of developments with local context, taking into account the surroundings, ensuring the use of high quality building materials and finishes and ensuring that the internal design and layout of developments are maximised to deliver sustainable development.
- 6.58 The Scheme has evolved through extensive pre-application discussions with officers at the LPA and key local stakeholders including the local community. The surrounding context of the Site has been fully considered during the design development of the Scheme. Details of how the scheme has responded following this feedback are set out in full detail in the Design and Access Statement. During pre-application engagement the proposed layout of the scheme has evolved to ensure the Council’s concerns regarding the proximity of Block A to both the Cottage Hospital and the surrounding residential accommodation has been addressed. The orientation of Block A has been amended during pre-application engagement with LBH to increase the separation distances to the Cottage Hospital and surrounding residential blocks, alongside ensuring that Block A is appropriately set back from the Cottage Hospital to retain the significance of the building. The proposed layout therefore seeks to deliver a high quality residential development which responds positively to not only the retained Cottage Hospital but also the surrounding residential buildings.
- 6.59 As set out above, the scheme seeks to deliver two four storey residential blocks which will be located to the east of the Cottage Hospital within both Plots 1 and 2. The proposed massing of the Development has been designed to reflect the surrounding character of the Site and seeks to respond to the surrounding heights of neighbouring buildings. The residential blocks have been designed to take cues from the local context which includes the use of pitched roofs, dormer windows, expressed balconies, chimneys and gables. The roof profiles of the proposed residential accommodation blocks have also been refined during pre-application engagement to ensure the scheme positively responds to local character. The gable

ends of the residential blocks provide a distinctive profile, which has been refined during pre-application engagement to ensure that a sensitively designed roof profile is delivered that enables sufficient height to deliver high quality accommodation in this space. These features in combination ensure that the design of the buildings are not only of a high quality but respond positively to the surrounding character.

- 6.60 Furthermore, the proposal seeks to sensitively refurbish the existing Cottage Hospital. This includes the removal of the wings and outbuildings on the east side of the building which are currently in a poor state of repair. The addition of sensitively designed infill extensions will seek to improve the overall quality of the locally listed building. The proposed infills will also bring architectural coherence to the western elevation, again improving the design quality of the building whilst retaining the elements of the building which are of heritage value.
- 6.61 Finally, the proposed material palette for the Proposed Development have been developed in response to the key materials of the surrounding site context. The Scheme proposes the use of a simple but high quality materials which includes facing brickwork, bespoke filigree metal work and clay tile roofing.
- 6.62 In conclusion it is considered that the Proposed Development would transform this brownfield site and provide a significant improvement to the character, appearance and function of the Site as well as providing a modern-fit-for-purpose Health Centre and high quality residential accommodation which accords with adopted planning policy. The Design and Access Statement, prepared by Allies and Morrison, forms part of this Application and provides further details on the design evolution and architectural approach of the Scheme.

Heritage

- 6.63 A strategic policy of the NPPF is to conserve and enhance the historic environment. Paragraph 184 describes heritage assets as an:
- “...irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”*
- 6.64 Paragraph 189 further states that in determining applications, local planning authorities should require an application to describe the significance of any heritage assets affected, including any contributions made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.65 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (Paragraph 193).
- 6.66 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (Paragraph 196).
- 6.67 Paragraph 200 states that LPAs should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 6.68 London Plan Policy HC1 states that developments proposals affecting heritage assets and their setting should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed.
- 6.69 At a local level, Policy DMHB 3 (Locally Listed Buildings) of the Local Plan Part 1 states that there is a general presumption in favour of the retention of buildings included within LBH's Local Listed. The Policy further states that the Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering

planning applications which propose major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character and setting of a Locally Listed Building.

- 6.70 A Heritage Statement, by Allies and Morrison has been submitted in support of this application. As set out above, the Application seeks permission for the refurbishment of the locally listed Cottage Hospital to deliver a high quality State-of-the-art Health Centre. The retention and refurbishment of the Cottage Hospital has been supported by Officer's during pre-application engagement to date.
- 6.71 The Heritage Statement identifies that the Building is not innovative nor architecturally distinct. The significance of the building therefore lies within the Building's interest to the local area and its historical interest, through its memorial association and as such, is right to be treated as a non-designated asset. The Report further identifies that the building needs substantial investment to bring it back into functional use and as such, the Proposed Development provides viable opportunity to bring the original building back into its original use as a community medical facility. The development has ensured that the oldest and most significant parts of the building are conserved alongside providing an opportunity to reinstate the position of the original entrance and to restore the appearance of the front façade.
- 6.72 Demolition has been restricted to later additions or parts of the building that do not contribute to its architectural significance and it is concluded in the Heritage Statement that the proposed extensions will enhance the setting of the old hospital. The proposal also seeks to preserve the war memorial beam and founders tablet. During pre-application engagement with the War Memorials Trust, the preservation of the beam and the founders tablet was supported as it was considered that through retaining the war memorial beam and founders table on site would ensure these features were made more publicly accessible.
- 6.73 The architecture of the new residential buildings has been inspired by an appreciation of the exiting Cottage Hospital and has been informed by the character of the Cottage Hospital. The design of the new development is considered to be in keeping with regards to scale, proportion, materiality and architectural character of the Cottage hospital and the introduction of the new open spaces around the building have been carefully designed to ensure the significance of the Cottage Hospital is enhanced.
- 6.74 The proposal therefore seeks to retain a locally listed building and through the sensitive refurbishment and extension of the Building will bring this important local building back into its original use. The alterations to the existing building including reinstating the existing entrance and the demolition of the poor quality extensions will seek to enhance the appearance of the building. Through creating an improved setting for the Cottage Hospital it is considered that the Proposed Development will enhance the setting of the Locally Listed Building. The Building's retention and refurbishment also aligns with LBH's and Mayor's sustainability agenda which places the emphasis and prioritisation of the reuse of existing building.
- 6.75 In summary the submitted Heritage Statement concludes that the proposal fully accords with the policy requirements set out in the NPPF, the London Plan and Hillingdon's Local Plan.

Landscaping

- 6.76 Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity and geological value.
- 6.77 Policy GG1 (Building strong and inclusive communities) of the London Plan states that to build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.
- 6.78 Part E of Policy GG1 goes onto state that development must ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which fosters a sense of belonging, which encourages community buy-in, and where communities can develop and thrive.

- 6.79 Part G of Policy GG1 sets out to ensure new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.
- 6.80 At a local level, Policy BE1 (Built Environment) of the Local Plan Part 1 states that the Council will require developments to improve the quality of public realm and provide for public and private spaces which are attractive, safe, functional, diverse, sustainable, accessible to all and respect the local character. Policy EM4 (Open Spaces and Informal Recreation) further states that the Council will seek to protect existing tree and landscape features and enhance new areas of vegetation cover.
- 6.81 Policy DMHB 14 (Trees and Landscaping) of the Local Plan Part 2 requires developments to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit. The policy further requires developments to provide a landscape scheme that includes both hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity.
- 6.82 The Landscaping Chapter within the Design and Access Statement, prepared by Camlins, details the landscaping strategy for the scheme. The strategy further seeks to deliver ecological enhancements to the area and provide high quality outdoor settings for the residents, visitors and staff to enjoy. The strategy has been designed to create distinct landscape areas for the Health Care and the residential elements of the Site, whilst ensuring a cohesive approach to delivering high quality landscaping is achieved across the site.
- 6.83 The landscaping strategy for the Site seeks to create a defined street frontage along Pinner Road and seeks to formalise this boundary by adding new street trees and introducing a new hedge to the understory which will provide both screening and greening to the development. Landscaping improvements are also proposed for the frontage of the Cottage Hospital to frame the new Health Centre and create a distinct environment for the health use on the Site. The delivery of high quality landscaping surrounding the Cottage Hospital will further assist in improving the setting of the locally listed building.
- 6.84 As part of the landscaping strategy for the Site, three gardens are proposed to serve the proposed health care use. As set out above, the gardens will be located to the east of the Cottage Hospital and will have distinct characteristics to reflect their purpose. Through the inclusion of a range of hard and soft landscaping elements within these gardens, these spaces will provide spaces for both staff and visitors of the Health Care Centre to relax and enjoy.
- 6.85 Communal gardens are also provided for Blocks A and B. These spaces will be densely planted with naturalistic arrangements of planting beds amongst natural stone flag paving. The proposed planting strategy for these spaces seeks to provide diversity in the internal spaces in these communal gardens, creating areas for private contemplation.
- 6.86 The Scheme also provides Green Roofs on the Blocks A and B, which will contribute to the greening of the development alongside providing amenity for the new residents. The planting strategy for these spaces comprises of hedges, trees and shrubs around the perimeter of the roof to create privacy between these spaces and the neighbouring residential accommodation. Pergolas will also be provided within these spaces to provide shelter and will be planted with climbers to create an attractive outdoor seating area.
- 6.87 The whole development achieves an Urban Greening Factor (UGF) of 0.32. Whilst it is noted that this is below the London Plan requirement of 0.4 UGF for residential development, this exceeds the requirement of 0.3 UGF for commercial developments. The proposed UGF also demonstrates an improvement by 0.06 on the existing condition on the Site. The proposed scheme includes a high quality landscaping solution, which maximises the greening across the Site through a number of initiatives.
- 6.88 In summary the scheme proposes a high quality landscaping strategy which not only enhances the setting of the Cottage Hospital but also creates distinct spaces for the future users of the development to enjoy. Further details of the proposed landscaping strategy are contained within the Design and Access Statement, specifically the Landscaping Chapter, prepared by Camlins.

Residential Amenity Space and Child Play Space

- 6.89 The Mayor's Housing SPG (November 2012) sets out a requirement for a minimum of 5sqm of private outdoor space that should be provided for 1-2 person dwellings and an additional 1sqm for each additional occupant (Standard 4.10.1). This guidance is repeated within Policy D6 (Housing quality and Standards) of the London Plan.
- 6.90 At a local level, Policy DMHB 18 (Private Outdoor Amenity Space) of the Local Plan Part 2 states that all new residential development will be required to provide good quality and usable private outdoor amenity space. Amenity space should be provided in accordance with the standards set out in Table 5.3 of the Local Plan. Part B of the Policy further states that balconies should have a depth of no less than 1.5 metres and a width of no less than 2 meters. Table 5.3 identifies that for studio and one bedroom units should provide a minimum of 20 sqm of private amenity space, two bedrooms should provide 25 sqm and 3 + bedrooms should provide 30 sqm. The accompany text states that private outdoor amenity spaces will be required to be well located, well designed and usable for the private enjoyment of the occupier.
- 6.91 All units in the development will have access private amenity which will be directly accessed from the living room. At ground floor, this will be provided in the form of gardens and at upper levels amenity will be provided through the addition of balconies. These will either be cantilevered balconies or at the most upper levels in set balconies within the dormer structure. This will provide 939 sqm of private amenity space across both Plots A and B.
- 6.92 In addition to the balconies and patios provided as part of the scheme, 1,131 sqm of shared communal amenity space will also be provided for the residents in the form of communal courtyards and roof terraces. In total the scheme therefore delivers a total of 2,070 sqm of amenity space.
- 6.93 Whilst it is noted that the private amenity falls short of the LBH requirement by 661 sqm, the scheme exceeds the Mayor of London's requirement for private amenity space. Notwithstanding this, the provision of 2,070 sqm high quality amenity space in the form of both private and communal amenity, will ensure residents have access to amenity which is useable, accessible and overlooked.
- 6.94 Furthermore, Policy S4 (Play and Informal Recreation) of the London Plan states that development proposals for schemes that are likely to be used by children and young adults should increase opportunities for play and informal recreation and enable children and young people to be independently mobile.
- 6.95 The Policy further states that for residential development proposals should incorporate good-quality accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that provides a stimulating environment, is accessible to all safely from the street and forms an integral part of the surrounding neighbourhood. These spaces should also incorporate trees, be overlooked to enable passive surveillance and not be segregated by tenure.
- 6.96 At a local level, Policy DMHB 19 (Play Space) of the Local Plan Part 2 requires all new major residential developments which result in an occupancy of ten or more children to provide children and young people's play facilities on-site. Where the required provision of playspace cannot be provided on Site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area.
- 6.97 The Scheme delivers a total of 280 sqm of children's playspace. This will be provided through 140 sqm of door step play located within the roof terraces of both Plots A and B, and 140 sqm within communal courtyards. These spaces have been designed to respond to the needs of both 0-5 years and up to 11 years. It is also identified within the Design and Access Statement, that an accessible, equipped neighbourhood playspace is located within 400m of the development within the Northwood Recreation Ground.
- 6.98 In line with the Mayor's Play Space Calculation, the scheme is required to provide 196.9 sqm of children's play space. The Scheme therefore exceeds the required provision and delivers high quality playspace throughout the development.

Residential Amenity

- 6.99 The NPPF states (Paragraph 127) that developments should create places with a high standard of amenity for existing and future users. Paragraph 180 of the NPPF further requires new developments to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development.

Daylight and Sunlight

- 6.100 The NPPF states (Paragraph 127) that development should create places with a high standard of amenity for existing and future users. Paragraph 180 of the NPPF requires new development to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development.

- 6.101 With regard to Daylight and Sunlight specifically The NPPF states at paragraph 123 c):

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

- 6.102 London Plan Policy D6 (Housing quality and standards) states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside space.

- 6.103 At a Local Level, Policy DMHB 11 (Design of New Development) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

- 6.104 A Daylight and Sunlight Report has been prepared by Avison Young and accompanies this Submission. The report considers the potential effects of the Proposed Development upon the daylight and sunlight amenity to neighbouring residential properties and the level of sun hours on ground overshadowing to existing neighbouring amenity areas. The report also considers the provision of daylight and sunlight within the newly proposed dwellings and the level of sun hours on ground overshadowing to proposed amenity areas.

- 6.105 With regards to the impact of the development on neighbouring properties, the Report considers the impact of the proposal on the following developments:

- 16-24 Acre Way (even);
- Juniper Court;
- 6-15 Neal Court (Inclusive);
- 8-10 Waverley Gardens (even);
- Sovereign Court;
- 80 Pinner Road; and
- 74 Pinner Road.

- 6.106 The Report identifies that full compliance with the BRE Guidelines for both daylight and sunlight will be achieved at 80 Pinner Road, 74 Pinner Road, 6-15 Neal Court, 8-10 Waverley Court and 16-24 Acre Way. With regards to Juniper Court, of the 60 windows tested 92% of these would meet the BRE guidelines and therefore considered to experience a negligible effect (not significant). The remaining 5 tested windows experienced an alteration between 20-24%. In light of this it is considered in the report that the overall effect on this property is considered to be 'minor adverse' and as such are considered to be acceptable given the level of retained daylight and sunlight value and the general compliance with the BRE guidelines. With regards to Sovereign Court all windows relevant for assessment retain at least 0.8 of their former value and therefore comply with the BRE guidelines with regards to sunlight. Turning to daylight, 85% of the assessed windows retain at least 0.8 times their former value and adhere to the BRE guidelines. The remaining 11 windows retain 0.59 to 0.79 of their former values, which is considered to be acceptable as these isolated adverse impacts relate to windows which sit below amenity spaces (balconies) and are already partially restricted to daylight. The Report concludes that with

regards to neighbouring amenity, the Scheme will not give rise to any unacceptable impacts on neighbouring developments with regards to daylight and sunlight.

- 6.107 The Report also assesses neighbouring amenity areas and confirms that these areas will retain at least two hours of direct sunlight on the 21st March to over 50% of their areas in the proposed context and are therefore compliant with the BRE Guidelines.
- 6.108 The Report identifies that 97% of all habitable rooms assessed within the Proposed Development will meet the minimum recommended ADF for the specific room types. The 6 which do not meet the recommendations are either reasonably near the guidelines or located within units which already received good amenity levels to other habitable areas. The results therefore demonstrate that with regards to daylight the Proposed Development delivers very high level of daylight compliance.
- 6.109 The Report also considers the sunlight levels received within the Proposed Development. The Report identifies that whilst it is not possible to fully meet the BRE Guidelines in light of the Site's context, 93% of the windows will meet the recommendations for winter sunlight with 88% of the windows achieving total sunlight. The remaining 7% of windows are marginally below the recommended BRE guidelines however it is not considered that this would give rise to unacceptable harm on the amenity of future residents. The Report concludes that the proposed design seeks to maximise levels of light received given the Site context and the need to make the most efficient use of the Land.
- 6.110 Finally, the Report also considers the new proposed outdoor amenity spaces with regards to overshadowing. 27 of the amenity areas within the development achieve the BRE guidelines. The remaining 3 areas which do not achieve the BRE guideline requirements are located to the north of the building structures where lower amenity levels ought to be anticipated. These spaces represent a small proportion of the outdoor amenity space and are not the primary amenity areas. As such, it is anticipated that all occupants of the future development will have good access to outdoor amenity.

Noise

- 6.111 Paragraph 180 of the NPPF requires developments to mitigate and reduce to a minimum the potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on healthy and the quality of life.
- 6.112 Policy D14 (Noise) of the London Plan states that in order to reduce, manage and mitigate noise to improve health and quality of life, residential and non-aviation development proposals should manage noise by avoiding significant adverse impacts on health and quality of life, reflect the Agent of Change principle, mitigate and minimise the existing and potential adverse impacts of noise and improve and enhance acoustic environments.
- 6.113 At a local level, Policy EM 8 (Land, Water, Air and Noise) of the Local Plan Part 1 states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.
- 6.114 This Application is accompanied by a Noise Impact Assessment, prepared by Sandy Brown. The Assessment identifies that the primary noise sources associated with the scheme are a series of source heat pumps serving the residential building and the VRF units serving the medical centre.
- 6.115 Due to the COVID-19 Pandemic, the baseline noise conditions have been established by using noise mapping databases and predictions based on traffic flow data. This is in line with the guidance on undertaking a robust estimate of the environmental noise climate and is in line with the "Joint Guidance on the Impact of COVID-19 on the Practicality and Reliability of Baseline Sound Level Surveying and the Provision of Sound & Noise Impact Assessments" produced by the Association of Noise Consultants and the Institute of Acoustics.
- 6.116 Based on the requirements of the LBH, all plant will be designed to ensure that the cumulative noise level at 1 m from the worst affected windows of the nearby noise sensitive premises does not exceed LA_{eq} 40 dB during the daytime and LA_{eq} 30 dB at night. The report confirms that the predicted plant noise egress level will meet these limited and LBH's requirements set out above.

- 6.117 The Assessment also considers the sound insulation performance of the proposed development. The Assessment demonstrates that with windows open, internal noise levels in Block B and the north facing elevation of Block A may marginally exceed the LBH guidelines but this is not considered to affect the amenity of the residents. The report identifies that the internal noise levels in Block A may exceed these criteria by approximately 12-17 dB at the worst affected façade. When considering open windows for the purpose of overheating control, a comparison between acoustic comfort and sustainability is often accepted for limited periods. The current design incorporates blinds, MVHR units and external shading in the worst affected areas which reduces period of overheating and the need for open windows as far as reasonably possible. The report concludes that the need to open the windows would only be 4-13 days per year.
- 6.118 The report therefore demonstrates that notwithstanding the minor exceedances in LBH required noise levels when windows are open, the Proposed Development accords with the planning policy guidance set out above.

Air Quality

- 6.119 Paragraph 181 of the NPPF supports opportunities to improve air quality or mitigate impacts where necessary. At a local level Policy PP35 (A Safe, Connected and Accessible Transport Network) states that in relation to Air Quality any potential significant impact on local air quality will require proportionate mitigation measures to support walking and cycling and public transport use or appropriate measures to prevent adverse effects, either alone or in combination.
- 6.120 London Plan Policy SI 1 (Improving Air Quality) states that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits or delay the date at which compliance will be achieved or create unacceptable high levels of exposure to poor air quality. In order to achieve this, the Mayor will require development proposals to be at least Air Quality Neutral and be designed to prevent and minimise increasing exposure.
- 6.121 Policy EM 8 (Land, Water, Air and Noise) of the Local Plan Part 1 outlines that all developments should not cause deterioration in local air quality levels and should ensure the protection of both existing and new sensitive receptors. The Policy further states that all major developments within Air Quality Management Areas should demonstrate how air quality neutrality is achieved where appropriate.
- 6.122 Policy DMEL 14 (Air Quality) of the Local Plan Part 2 further states that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. The Policy further requires that development proposals as a minimum should be at least 'air quality neutral', include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, and actively contribute towards the improvement of air quality, especially within Air Quality Management Area.
- 6.123 To accompany this Application, an Air Quality and Air Quality Neutral Report has been prepared by IDOM. The Report identifies that the Site is not situated within an Air Quality Management Area but is partially situated within the Hillingdon's Northwood East Air Quality Framework Area. The Report identifies a 'medium' risk of dust impacts during earthworks and demolition phases of construction in the absence of mitigation. A number of mitigation measures are provided within the report and are recommended to be incorporated into any future Construction Environmental Management Plan. If appropriate mitigation is adopted it is considered that the overall effect on local air quality is considered to be 'not significant' during construction phase.
- 6.124 Turning to the proposed development, the anticipated net increase in traffic associated within the Proposed Development is considered to be 'negligible'. Furthermore, the existing gas fired boilers are to be removed from the Site as part of the Proposed Development and replaced by ASHPs for the residential accommodation and external VRF units for the Health Care Centre. This is considered to be beneficial in air quality terms.
- 6.125 The Assessment further demonstrates that the Proposed Development will be 'Air Quality Neutral'. In light of the Site's partial location within the Air Quality Framework Area, mitigation over the minimum standard is required. Any associated damage cost associated with the development will be calculated during the determination of the application.
- 6.126 The Assessment concludes that the Proposed Development adheres with the relevant policy guidance and that there is no reason which would preclude the granting of planning permission for the development as proposed.

Transport

- 6.127 Section 9 of the NPPF sets out the Government's policies with regard to transport. Paragraph 108 sets out that development should be ensured that:
- a) *"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) *safe and suitable access to the site can be achieved for all users; and*
 - c) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*
- 6.128 Chapter 10 of the London Plan provides the regional guidance for transport. London Plan Policy T1 (Strategic approach to transport) states that all developments should make the most effective use of land, reflecting its connectivity by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 6.129 London Plan Policy T2 (Healthy Streets) states that proposals should reduce the dominance of vehicles on London's streets, whilst being permeable by foot and cycle and connectable to local walking, cycling networks as well as public transport.
- 6.130 At a local level, Policy DMT 1 (Managing Transport Impacts) of the Local Plan Part 2 states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. The Policy further states that for developments to be acceptable they are required to be accessible by public transport, walking and cycling, maximise safe, convenient and inclusive accessibility to and from the development, provide equal access for all people, adequately address delivery, servicing and drop-off requirements and have no significant adverse transport impacts on noise and air quality.
- 6.131 The Transport Assessment, prepared by RPS, has been submitted with the application. The Transport Assessment identifies that the Site is accessible to several local facilities and public transport services. Whilst it is noted that the Site benefits from a PTAL rating of between 1b and 2, the Transport Assessment identifies that when utilising the TIM Mapping Tool the Site is highly accessible to several key destinations within 60-minute travelling time.
- 6.132 With regards to the proposed trip generation of the Proposed Development, the Transport Assessment considers both the trip generation for the residential and health care element of the Scheme. The Transport Assessment identifies a net change in multi-modal trip generation however the report further notes that this would not have a material impact on the local transport network. This is also considered the case for the trip generation of the servicing and delivery vehicles.
- 6.133 Furthermore, as set out above the Proposed Development seeks to improve connectivity throughout the Site. This includes the creation of a new access route from Pinner Road into Block B. The creation of this new access route encourages the provision of walking and cycling to the Site from Pinner Road.
- 6.134 The report concludes that the development will provide safe and suitable access to the development and the residual cumulative impact of the development is not considered to be server and as such the Scheme accords with the policy requirements set out above.

Car Parking

- 6.135 The NPPF requires Local Authorities to consider parking provision within new developments based upon the accessibility of the development and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.136 Policy T6.1 (Residential Parking) of the London Plan states that developments should not exceed the maximum parking standards set out in Table 10.3. In line with the requirements of Table 10.3, based on the Site's location within an Outer London Borough within an area which benefits from a PTAL rating of 2, the scheme should deliver up to 0.57 spaces per 1-2 bedroom dwellings and up to 1 space for 3+ bedroom dwellings.

- 6.137 Part G of Policy T6.1 states that disabled parking should be provided for new residential developments. Residential development proposals delivering ten or more units must as a minimum, ensure that three per cent of dwellings provide at least one designated disabled parking bay per dwelling. This should be provided from the outset. Development proposals are further required to demonstrate through a Parking Design and Management Plan how an additional seven per cent of dwellings could be provided with one designated disabled person's parking spaces per dwelling.
- 6.138 The London Plan does not prescribe maximum car parking standards for Healthcare facilities.
- 6.139 At a local level, Table 4.4 of the Local Plan Part 2 requires the provision of 1-1.5 spaces per studio, one bedroom and two bedroom units. For 2 or more bedroom units, 2 spaces should be provided. With regards to the Healthcare Centre, the Local Plan Part 2 requires car parking to be delivered on an individual site basis and a transport assessment should be used to demonstrate the parking provisions acceptability.
- 6.140 This Application is also accompanied by a Travel Plan for both the residential and healthcare element of the scheme, which identifies sustainable lifestyle measures that in turn will reduce the need to travel by private car. The adoption of the Travel Plan will ensure that reliance on the private car is reduced and in turn reduce the need for private cars on the Site.
- 6.141 The Transport Statement concludes that the provision of 69 residential car parking spaces, whilst falling short, by 1 car parking space of the Council's requirements for a 1:1 provision, would not have a significant impact on highways and therefore is considered acceptable. Furthermore, the Transport Statement draws upon Census data to demonstrate that the proposed provision of parking is appropriate in light of local car ownership. The relevant car ownership figures as established within the Census demonstrates that 19% of households within the Northwood Hills ward do not own a car. This clearly demonstrates that it is unlikely that all residents of the Proposed Development will have or require access to a car and therefore further demonstrates the acceptability of the proposed parking provision. Finally, the Site is also located within proximity to several modes of travel including London Underground, bus and cycle provision and as such the ratio of 0.98 is considered acceptable in light of the Site's accessibility.
- 6.142 The Transport Statement further demonstrates that the provision of 52 car parking spaces for the Health Centre is appropriated. It should also be noted that the Proposed Development seeks to increase the existing provision of car parking by 12 spaces in comparison to the existing provision provided for the Health Centre. This will seek to ensure that the Proposed Development can appropriately accommodate the increased provision of services to be provided within the Cottage Hospital.
- 6.143 This accords with the LBH's and the London Plan requirement to provide car parking for such a use on an individual basis using a transport assessment to demonstrate compliance and the required need for the health centre.

Cycle Parking

- 6.144 Paragraph 104 of the NPPF requires developments to provide for high quality walking and cycling networks and supporting facilities such as cycle parking.
- 6.145 Policy T5 (Cycling) of the London Plan states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through the provision of appropriate levels of cycle parking, which should be fit for purpose, secure and well-located. Developments should provide cycling parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2 of the London Plan and should be designed and laid out in accordance with the London Cycling Design Standards.
- 6.146 Table 10.2 identifies a cycle parking provision for the Site of:

Residential

- Long Stay: 1 space per studio or 1 person 1-bedroom dwelling, 1.5 spaces per 2-person 1-bedroom dwelling and 2 spaces per all other dwellings;
- Short Stay: 5 to 40 dwellings 2 spaces and 1 space per 40 dwellings thereafter.

Heath Centre

- Long Stay: 1 space per 5 FTE Staff; and
- Short Stay: 1 space per 3 FTE Staff.

6.147 At a local level, Policy DMT 5 (Pedestrians and Cyclist) of the Local Plan Part 2 states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the Site connecting it to the wider network. Provision of cycle parking and changing facilities should be delivered in accordance with the requirements set out in Table 1.

6.148 Table 1 requires the following cycle parking provision

Residential

- 1 space per studio, 1 or 2 bed units and 2 spaces per 3 or more bed unit.

Heath Centre

- 1 space per 5 staff members and 1 space per 10 visitors.

6.149 The Transport Statement is based on the assumption that there will 21 staff members who will be full time members of staff, which equates to a required cycle parking capacity requirement of 4 long stay cycle parking spaces and 7 short stay cycle parking spaces. The Proposed Development seeks to deliver 20 cycle parking spaces for the Health Centre and as such exceeds the requirements of both the Local and London Plan. Staff will also have access to lockers, showers and changing facilities to assist in encouraging staff members to cycle to work.

6.150 With regards to cycle provision for the residential element of the scheme, the proposal delivers a total of 109 long stay secured, covered and accessible cycle parking spaces which will serve both Block A and B. 2 cycle parking spaces will also be provided for visitors. Block A will accommodate 49 long stay cycle parking spaces with 42 two tier and 3 spaces as Sheffield Stand Parking. Block B will have 60 long stay spaces with 54 two tier and 6 spaces as Sheffield Parking Stands.

6.151 Whilst it is acknowledged that the provision of cycle parking falls short of the London Plan requirement, the provision of 111 cycle parking spaces for the residential element exceeds the Local Plan requirement by 36 spaces and as such is considered appropriate.

6.152 The proposed cycle provision therefore accords with the requirements as set out in the Local Plan and seeks to achieve the aims of the London Plan and the NPPF.

Energy and Sustainability

6.153 Section 14 of the NPPF relates to 'Meeting the challenges of climate change, flooding and coastal change' and states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

6.154 Paragraph 150 of the NPPF states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 153 requires new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

6.155 Policy SI2 (Minimising greenhouse gas emissions) of the London Plan outlines that major developments should be net zero-carbon, which means reducing carbon dioxide emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation;
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;

- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and
 - 4) be seen: monitor, verify and report on energy performance.
- 6.156 Policy SI2 also sets out that a minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. Non-residential development should achieve 15% through energy efficient measures. Policy SI2 outlines that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 6.157 Policy SI4 (Managing heat risk) of the London Plan outlines that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 6.158 Policy SI5 (Water Infrastructure) of the London Plan requires development proposals to achieve at least the BREEAM excellent standard for the 'Wat 01 water category' or equivalent for commercial developments.
- 6.159 Policy SI7 (Reducing waste and supporting the circular economy) of the London Plan sets out that resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible. Developments should encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products.
- 6.160 At a local level, Policy EM1 (Climate Change Adaption and Mitigation) of the Local Plan Part 1 states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This will be achieved through prioritising higher density development in urban and town centres, promoting a modal shift away from private car use, ensuring developments meet the highest design standards and targeting areas with high carbon emissions for additional reductions through low carbon strategies. The Policy further states the Council will encourage the installation of renewable energy for all new developments to assist in meeting the carbon reduction savings set out in the London Plan.
- 6.161 Policy DMEI 2 (Reducing Carbon Emissions) of the Local Plan Part 2 further requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 6.162 Policy DMEI 3 (Decentralised Energy) in addition requires all major developments to be designed to be able to connect to a Decentralised Energy Network. Proposals within 500 meters of a planned Decentralised Energy Network will be required to connect to that network, and a reasonable financial contribution to connection charge. Major developments located within 500m of a planned future Decentralised Energy Network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and development shall provide a reasonable financial contribution for future cost of connection via a legal agreement.
- 6.163 This Planning Application is accompanied by an Energy and Sustainability Statement, prepared by Sweco, which assesses the Proposed Development against the Energy Hierarchy and the development plan policies. The adopted strategy for the Site seeks to adopt an approach which combines the optimisation of passive design measures, energy efficient plant selection and renewable technologies. Through the adoption of this strategy the proposed development will result in an overall site-wide annual carbon reduction of 59.1% relative to the current Part L target emissions rate for the development which exceeds the policy target by 24.1%. With regards to the refurbishment works of the Cottage Hospital, the scheme will be compliant with the energy efficiency measures specified within Part L2B, where the new build elements will satisfy Part 2LA 2013 UK Building Regulations.
- 6.164 The proposed Energy Strategy for the residential development will comprise of a centralised Air Source Heat Pump system which will provide heating and hot water to the residential elements via a heat interface unit. Separate heat pumps will be provided for each residential building. For the healthcare element the use of hybrid variable refrigerant flow (HVRF) systems will be implemented to provide heating and cooling.
- 6.165 Whilst the proposed Energy Strategy for the development has followed the Mayor's Energy Hierarchy and seeks to achieve an overall site-wide annual carbon reduction of 59.1% relative to the current Part L target emissions rate, the Scheme does

not achieve net zero carbon and as such a carbon offset payment is required. As identified within the accompanying Energy Statement this has been calculated based on a domestic annual shortfall of 26.8 tonnes of regulated CO₂. In line with the Mayor's rate of £95 per tonne per year this equates to a payment of £2,850 over a period of 30 years (£76,537). This should be secured via an appropriately worded S106 contribution.

6.166 With regards to sustainability, the Statement identifies a number of key sustainability features proposed within the development which seek to ensure a high quality sustainable development is brought forward. In summary this includes:

- Responsible construction practices by the main contractor responsible for the works on site to reduce nuisance and environmental impacts from the construction;
- Appropriate and thorough commissioning and testing of building services prior to handover to incoming tenants;
- Improve occupant experience through the upgrade of existing building services, ventilation, heating and cooling strategies;
- Limiting internal acoustic disturbance to increase tenant wellbeing;
- Improved overall site-wide energy performance through the use of LED lighting, upgraded and new heating, cooling and ventilation services and new glazing with higher thermal performance;
- Promote sustainable modes of transport and safe access to site;
- Conserve water through water efficient fittings, water meters and leak detection systems and reduction of water consumption;
- Materials to be responsibly sourced and of low VOC where possible; and
- Re-use of existing building structure, reducing waste generated from demolition and limiting any additional waste construction waste where possible.

6.167 In conclusion, the proposed development will provide a highly energy efficient and sustainable development in compliance with national, regional and local planning policies.

Ecology and Biodiversity

6.168 The NPPF promotes biodiversity in recognition of its role in supporting the natural and local environment, under paragraph 170, by requiring planning policies to protect sites of biodiversity value and provide net gain for biodiversity.

6.169 London Plan Policy G6 (Biodiversity and Access to Nature) states that development proposals should mitigate impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

6.170 Policy EM7 (Biodiversity and Geological Conservation) of the Local Plan Policy Part 1 states that the Council will seek to protect and enhance the population of protected species and the provision of biodiversity improvements for all development, PD12756 where feasible should be explored. The policy further states that the provision of green roofs and living walls which contribute to biodiversity would be supported.

6.171 Furthermore, Policy DMHB 14 (Trees and Landscaping) of the Local Plan Part 2 states that the Council will expect all developments to retain or enhance existing landscaping, trees and biodiversity or other natural features of merit. Development proposals will be further required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity.

6.172 A Preliminary Ecological Assessment has been prepared by TetraTech and accompanies this submission. The Assessment acknowledges that previous ecological assessments were carried out on the Site in 2015 and 2017/2018, which identifies that the Site was suitable for roosting bats, reptiles and breeding birds. The 2015 bat survey confirmed within Building 1 and Building 2 that bat roosts for brown long-eared bats (*Plecotus Auritus*) were present. Updated bat surveys were further undertaken in 2018 which confirmed the results recorded in the 2015 surveys.

6.173 The purpose of the 2021 Report is to provide an update to the extended Phase 1 Habitat Survey and an up to date assessment of the potential ecological receptors present on the Site. The Assessment identifies that the habitats on the Site have not significantly changed since the previous Ecological Appraisal was undertaken in 2018.

6.174 The Report notes that the Site has suitability and/or potential to support the following protected species:

- Roosting bats;
- Foraging and commuting bats;
- Reptiles
- Badger;
- Breeding birds;
- Hedgehog; and
- Invertebrates.

6.175 In light of the above, the Assessment recommends additional survey works and mitigation measures. This includes an updated bat survey to determine the number and species of bats currently roosting within the Cottage Hospital, a sensitive external lighting strategy for the proposed development to avoid adverse impact on forage and community baths, pre-works inspection for badgers and a two stage vegetation clearance and measures to reduce the impacts on badger during construction. The inclusion of such measures will ensure that the proposal would be acceptable in terms of biodiversity and can be secured via an appropriately worded condition.

Trees

6.176 Paragraph 175 of the NPPF states that significant harm to biodiversity should be avoided and where this cannot be achieved be adequately mitigated or as a last resort, compensated for.

6.177 Policy G7 (Trees and Woodlands) of the London Plan states that development proposals should ensure wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed.

6.178 Policy EM 4 (Open Space and Informal Recreation) of the Local Plan Part 1 outlines that the Council will seek to protect the existing tree and landscape features and enhance open spaces with new areas of vegetation.

6.179 Furthermore, Policy DMHB 14 (Trees and Landscaping) of the Local Plan Part 2 states that the Council will expect all developments to retain or enhance existing landscaping, trees and biodiversity or other natural features of merit. Development proposals will be further required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity.

6.180 The Application is accompanied by an Arboricultural Impact Assessment, which is prepared by Tamla Trees. The Assessment provides details of the existing trees on the Site. The Assessment categorises the existing trees on the Site in line with the British Standard Methodology following a survey of the Trees in April 2020. As set out above, the Site is subject to a Tree Preservation Order (TPO 542). The designated Tree Preservation Order includes 5 individual trees, of which 3 are no longer on the Site. The two remaining trees on the Site are category U trees. To facilitate the Proposed Development, a total of 18 individual trees are required to be removed. Of these 18 trees, 1 A Class Tree, 9 B Class Trees, 6 C Class Trees, and 2 U Class Trees. In addition to this, of the eight tree groups surveyed, 4 groups are to be removed. These are of category B and C. The existing trees to be protected on Site will be safeguarded in accordance with the recommendations set out within the Arboricultural Impact Assessment provided as part of the Application.

6.181 Furthermore, the Landscaping Chapter and Landscaping Plans provide further details on the proposed tree planting strategy for the Proposed Development. The tree planting strategy for the Site seeks to deliver 67 new trees within the car park area and the communal gardens. In addition to this, 42 Pleached trees are proposed along the boundaries of the Site. To ensure that the proposed trees within the car parking areas can be appropriately accommodated, the Scheme proposes the introduction of fully engineered tree pits within the soil cell structures, which will extend beneath the paving. Each group of trees will be in a connected tree pit containing load bearing tree sand, drainage to the base and combined watering and aeration pipes. This ensures that the best possible condition for the Tree's survival is provided. Further details of the proposed Tree Planting Strategy is provided within both the Design and Access Statement but also detailed on plan ref: SY619-100-003.

- 6.182 Whilst it is acknowledged that the removal of 18 trees is required to facilitate development, the Proposal seeks to deliver a total of 67 new trees. The tree planting strategy has been carefully considered as part of the Application and through the adoption of the measures set out within the accompanying Arboricultural Impact Assessment the retained trees and those proposed will be safeguarded to ensure that the development delivers a high quality green and sustainable environment.

Archaeology

- 6.183 Chapter 16 of the NPPF relates to the conserving and enhancing the historic environment and identifies heritage assets as an irreplaceable resource and that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 6.184 Policy HC1 (Heritage Conservation and growth) of the London Plan, as set out above, requires development proposals affecting heritage assets and their settings to conserve their significance.
- 6.185 Policy HE1 (Heritage) of the Local Plan Part 1 states that the Council will expect developments to conserve and enhance Hillingdon's distinct and variant environment, its setting and the wider historic landscape which includes archaeological significant areas.
- 6.186 This Application is accompanied by an Archaeological Assessment, prepared by Cotswolds Archaeology which concludes that it is considered unlikely that any proposed development of the Site would impact on any significant deposits. As the Site has been subject to previous disturbances during the construction of various phases of the healthcare buildings it is likely that any upper level archaeological features would have been discovered. The proposal therefore is in accordance with the planning policy guidance set out above in relation to archaeology.

Contamination

- 6.187 Paragraph 178 of the NPPF requires planning policies and decisions to ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 6.188 At a local level, Policy DME1 12 (Development of Land Affected by Contamination) of the Local Plan Part 2 states that proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants. The Council will support planning permission of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the Site can be safely remediated so that the development can be made suitable for the proposed use.
- 6.189 This Application is accompanied by a Phase 2 Geo-environmental and Geotechnical Site Investigation, which has been prepared by RSK. The Report identifies that the Site was undeveloped agricultural land until the construction of the existing Cottage Hospital and the Health Centre. The ground investigation recorded a variable thickness of made ground comprising a gravelly clay with varying proportions of brick and concrete. The results from the subsequent soil testing recorded limited evidence of contamination that poses a potential risk to future users. Whilst it is noted that only a single elevated concentration of lead in the made ground and asbestos was noted within the sample, not all areas of the Site were able to be tested due to the existing building's presence on Site. As such, it is recommended that a clean capping layer is adopted for all future soft landscaped areas to prevent site users coming into direct contact with any impacted made ground. It is recommended a 300mm capping layer comprises clean topsoil would be suitable.
- 6.190 The Report concludes that a remediation strategy should be developed for the Site outlining the proposed mitigation measures. This can be secured through an appropriately worded condition and upon the adoption of such a condition the scheme is considered to be acceptable with regards to contamination.

Flood Risk and Drainage

- 6.191 Paragraph 155 of the NPPF requires developments in areas at risk of flooding to be avoided and where development is necessary in such areas these should be made safe for its lifetime without increasing flood risk elsewhere.

- 6.192 Policy SI 12 (Flood Risk Management) states that the current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way in collaboration with the Environmental Agency.
- 6.193 At a local level, Policy EM6 (Flood Risk Management) of the Local Plan Part 1 states that the Council will require new development to be directed away from Flood Zone 2 and 3 in accordance with the principles of the NPPF. Policy DMEI 9 (Management of Flood Risk) of the Local Plan Part 2 states that development proposals in Flood Zone 2 and 3 will be required to demonstrate that there is no suitable sites available in areas of lower flood risk. Development proposals in these areas will be required to submit a Flood Risk Assessment.
- 6.194 This Application is accompanied by a Flood Risk Assessment prepared by Evolve. The Report confirms that the Site lies within Flood Zone 1 and as such the delivery of residential accommodation (a sensitive use) is considered acceptable. The report identifies that in light of the Site position in Flood Zone 1 there is no need to provide mitigation against fluvial and tidal flooding and groundwater flooding. With regards to surface water flooding, the Report states that mitigation is required to minimise the flood risk associated with excess surface water runoff. This should be achieved through raising the ground level by 150mm and adopting a sustainable drainage system. The report also identifies that attenuation and flow rate restrictions should be considered for the proposed surface water drainage to achieve a significant reduction on the existing run off rates.
- 6.195 The Report concludes that subject to the mitigation measures identified within the Report being implemented, the development would be safe, without increasing the flood risk elsewhere and therefore acceptable with regards to Flood Risk.
- 6.196 Paragraph 163 of the NPPF outlines that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Part c of Paragraph 163 requires development to demonstrate that they incorporate sustainable drainage systems, unless there is clear evidence that this would be inappropriate.
- 6.197 Policy I13 (Sustainable drainage) of the London Plan outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:
- 1) *rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation);*
 - 2) *rainwater infiltration to ground at or close to source;*
 - 3) *rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens);*
 - 4) *rainwater discharge direct to a watercourse (unless not appropriate);*
 - 5) *controlled rainwater discharge to a surface water sewer or drain; and*
 - 6) *controlled rainwater discharge to a combined sewer.*
- 6.198 Policy SI13 goes on to state that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 6.199 Policy DMEI 10 (Water Management Efficiency and Quality) of the Local Plan Part 2 states that applications for all new build developments are required to include a drainage assessment demonstrating that appropriated sustainable drainage systems (SUDS) have been incorporated.
- 6.200 A Drainage Assessment has been prepared by Evolve and accompanies this Application.
- 6.201 The Assessment identifies that due to the clays underlying the site it would not be feasible to use infiltration drainage and as such this option has been discounted. With regards to the discharge of surface water into a Surface Water Body, given that there are no surface water bodies on the Site or in the vicinity this approach has been discounted.
- 6.202 The proposed drainage strategy for the Site therefore seeks to discharge into a surface water sewer. The proposal seeks to maintain the existing discharge regime for the surface water from the Site and connect into an existing below ground gravity drainage system. In addition to this, the Scheme also seeks to incorporate sustainable urban drainage systems

within the proposed strategy. This includes the provision of green roofs, permeable paving and underground water storage tanks.

- 6.203 The Assessment concludes that the drainage strategy has been developed with note to the Council's water cycle strategy for the reduction, recycle and re-use of water. Given the ground conditions, the reduction of the surface water into the sewer system is limited however green roofs have been utilised to reduce surface water flows. It is therefore concluded that the proposed drainage strategy accords with the relevant planning policy guidance as set out above and the inclusion of sustainable urban drainage system within the Scheme seeks to ensure the sustainability objectives of the Local Plan are also achieved.

Utilities

- 6.204 The Application is also accompanied by a Utilities Assessment prepared by Sweco. The Assessment identifies the existing utilities in the vicinity of the Site and demonstrates which services will be affected and unaffected as a result of the Proposed Development due to their proximity to the Site. The report concludes that further ground work survey work should be undertaken as part of detailed design stage and prior to the commencement of development in order to establish the exact location of the services.

7.0 PLANNING BALANCE

7.1 This section of the Planning Statement provides a planning balance assessment as required under adopted planning policies and section 38(6) of the 2004 Act.

7.2 Having regard to the assessment undertaken within this Statement, we consider the planning benefits arising from the scheme can be summarised below:

- The retention, refurbishment and extension of the existing Locally Listed Cottage Hospital to provide a state-of-the-art Health Care Centre as part of a mixed use development that would respond to the needs and requirements of the NHS and is in accordance with adopted policy;
- Sensitive refurbishment to the locally listed Cottage Hospital which enhances both the significance of the building but also the setting of the heritage asset;
- Increases visibility and public access to war memorial features;
- Successfully delivers the sustainable redevelopment of underused brownfield land;
- Delivers much needed housing which would contribute to meeting the Boroughs housing targets whilst simultaneously going towards funding the proposed Health Centre;
- Provides a key public building which contributes to the range of social and community facilities within the local area;
- The delivery of a mix of unit sizes which assists in establishing a mixed and inclusive community within the development;
- Improves connectivity throughout the Site, through the introduction of new permeable routes for both the Health Care Centre and the Residential accommodation;
- Delivers a comprehensive package of landscaping and public realm improvements alongside extensive urban greening measures;
- Delivers a high quality and sustainable building which exceeds the Policy requirement for carbon reduction;
- Delivers high quality architecture which responds to the character of the surrounding area;
- Delivers opportunities for employment through both the construction and end use phase;
- Delivers tangible environmental gains including reduced surface water run-off, sustainable urban drainage, ecological gain and energy efficient measures;
- The provision of high quality outdoor private and communal amenity space including the provision of both private balconies or patios for every individual residential unit;
- The delivery of a children's playspace provision which exceeds policy requirements;
- The delivery of a comprehensive landscaping scheme, which will deliver a high quality streetscape for the development fronting Pinner Road and contribute to the creation of new spaces for both the resident and health care users of the Site; and
- Ensuring the best use of the Site, delivering a sustainable form of development, which gives rise to no demonstrable adverse impacts on the residential amenity of existing or future residents.

7.3 It is considered that on the basis of the above, in the event that any identified harm arises from the Proposed Development the planning benefits brought about by and through the scheme represent material considerations which outweigh any such harm.

8.0 DRAFT HEADS OF TERMS AND CIL

Planning Obligations

- 8.1 Under S106 of the Town and country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in their land for the purpose of restricting or regulating the development of the land.
- 8.2 Paragraph 54 of the NPPF states that the local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 8.3 Paragraph 56 states that planning obligations should only be used where they are necessary, directly related to the development and fair and reasonable in scale and kind to the development. Paragraph 57 states that where up to date policies have set out the contributions, planning applications that comply with them should assume to be viable and it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment.
- 8.4 It is anticipated, at this stage, that the following Section 106 obligations will be applicable for the proposed scheme:
- Affordable Housing Contribution, subject to viability;
 - Carbon Offsetting Contribution;
 - Air Quality mitigation measures;
 - Travel Plan; and
 - Training and Employment.

Community Infrastructure Levy

- 8.5 The Mayoral Community Infrastructure Levy (CIL) applies to developments across all London Boroughs which propose new build floorspace above 100 sqm. This formally came into effect on 1st April 2012 (MCIL 1) and was later revised in April 2019 (MCIL 2). For LB Hillingdon, this is applied at a rate of £60 per sqm. It should be noted that developments used wholly or mainly for the provision of any medical or health services, except the use of premises attached to the residence of the consultant or practitioner, benefit from a nil rate for CIL.
- 8.6 LBH adopted its charging schedule in July 2014. The LBH also published on the 1st January 2021 their annual CIL Rate Summary which provides an indexed rate for development. For residential floorspace this is a rate of £133.48 per sqm. Floorspace which falls within a healthcare use (Use Class E) benefits from a nil CIL rate. A Cil additional Information Requirement Form has been submitted as part of this application.

9.0 SUMMARY AND CONCLUSIONS

9.1 This Planning Statement (“the Statement”) has been prepared by Montagu Evans LLP to assist with the determination of an application for planning permission at the Northwood and Pinner Cottage Hospital and Northwood Health Centre (referred to as ‘the Site’) submitted by NHS Property Services and NHS Hillingdon Clinical Commissioning Group (CCG). The application seeks the phased permission for the partial demolition, refurbishment and extension of the existing Cottage Hospital, to provide a state of the art health centre (Use Class E), and the comprehensive redevelopment of the remaining site area to provide residential accommodation (Use Class C3). The application is submitted to the London Borough of Hillingdon (the Council) as the local planning authority.

9.2 The description of development is as follows:

“Partial demolition, refurbishment and extension of the existing Cottage Hospital to provide a state of the art health centre and the comprehensive redevelopment of the remaining Site to provide residential (use class C3) accommodation and ancillary works including car parking, cycle parking, landscaping and associated works (phased).”

9.3 The Applicant Site is situated within the jurisdiction of the London Borough of Hillingdon (LBH), to the norther of Pinner Road, and comprises of a site area of approximately 1 hectare. A location plan showing the Site in the context of the surrounding area is included within this Application and is contained within Appendix 1 of this Statement.

9.4 The proposed development comprises of the following elements:

- The retention, refurbishment and extension of the existing Locally Listed Cottage Hospital to provide a state-of-the-art Health Care Centre as part of a mixed use development that would respond to the needs and requirements of the NHS and is in accordance with adopted policy;
- Sensitive refurbishment to the locally listed Cottage Hospital which enhance both the significance of the building but also the setting of the heritage asset;
- Increase visibility and public access to war memorial features;
- Successfully delivers the sustainable redevelopment of underused brownfield land;
- Delivers much needed housing (70 units) which would contribute to meeting the Boroughs housing targets whilst simultaneously going towards funding the proposed Health Centre;
- Provides a key public building which contributes to the range of social and community facilities within the local area;
- The delivery of a mix of unit sizes which assists in establishing a mixed and inclusive community within the development;
- Improves connectivity throughout the Site, through the introduction of new permeable routes for both the Health Care Centre and the Residential accommodation;
- Delivers a comprehensive package of landscaping and public realm improvements alongside extensive urban greening measures;
- Delivers a high quality and sustainable building which exceeds the Policy requirement for carbon reduction;
- Delivers high quality architecture which responds to the character of the surrounding area;
- Delivers opportunities for employment through both the construction and end use phase;
- Delivers tangible environmental gains including reduced surface water run-off, sustainable urban drainage, ecological gain and energy efficient measures;
- The provision of high quality outdoor private and communal amenity space including the provision of both private balconies or patios for every individual residential unit;
- The delivery of a policy compliant children’s playspace provision;
- The delivery of a comprehensive landscaping scheme, which will deliver a high quality streetscape for the development fronting Pinner Road and contribute to the creation of new spaces for both the resident and health care users of the Site;
- Ensuring the best use of the Site, delivering a sustainable form of development, which gives rise to no demonstrable adverse impacts on the residential amenity of existing or future residents;

- The provision of 69 car parking spaces, including 7 accessible spaces for the residential use and 52 car parking space, including 5 accessible spaces for the healthcare facility; and
- The delivery of Local Plan policy compliant cycle parking provision for the residential accommodation and the healthcare floorspace.

- 9.5 This Statement has provided an assessment of the proposals against the Statutory Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 9.6 The Proposal has been developed in consultation with the local community, officers at the Council and other key stakeholders as part of the pre-application consultation process. This has involved consultation on matters such as retention of the existing locally listed Cottage Hospital, design, layout, bulk, scale and massing, access and parking.
- 9.7 The redevelopment of this Site, which includes the retention of the Cottage Hospital, would ensure that this previously developed Site in a sustainable location is optimised in a nature which accords with the adopted Planning Policy. The scheme seeks to relocate the existing Health Care Centre within the refurbishment Cottage Hospital and bring the remainder of the underutilised Site for residential development. The delivery of a state-of-the-art Health Care provision within the Cottage Hospital will not only address the current needs of the local community but also the future needs of the Borough.
- 9.8 The delivery of 70 residential units would contribute to the LBH's increasing housing demand as set out in both the recently adopted London Plan and the Government's revised methodology for calculating housing need. The proposed unit mix has been developed in line with the Council's latest housing needs assessment and has been weighted to one and two bedroom units to reflect the nature of the proposed development.
- 9.9 The Scheme has been carefully designed to optimise the density of the development, whilst respecting the prevailing density character of the surrounding area. The delivery of the proposed massing which comprises of two four storey residential accommodation blocks would ensure that the proposal is in keeping with the surrounding building heights. The proposed layout of the Site has been developed to ensure that sufficient separation distances are maintained between both the Cottage Hospital and the new residential development and the surrounding neighbouring accommodation blocks.
- 9.10 In accordance with policy, a Financial Viability Appraisal has been submitted as part of this planning application to support the applicants approach to affordable housing provision in the context of the need to provide an enhanced, fit for purpose Health centre in this location.
- 9.11 In conclusion, the Scheme is considered to be in accordance with the relevant national planning policy guidance and the Development Plan. When assessing the Planning Balance of the scheme, it is considered that the planning benefits brought about by the proposals outweigh any perceived harm and therefore we consider that on balance this application should be approved by the Local Planning Authority.

MONTAGU EVANS

**70 ST MARY AXE
LONDON
EC3A 8BE**



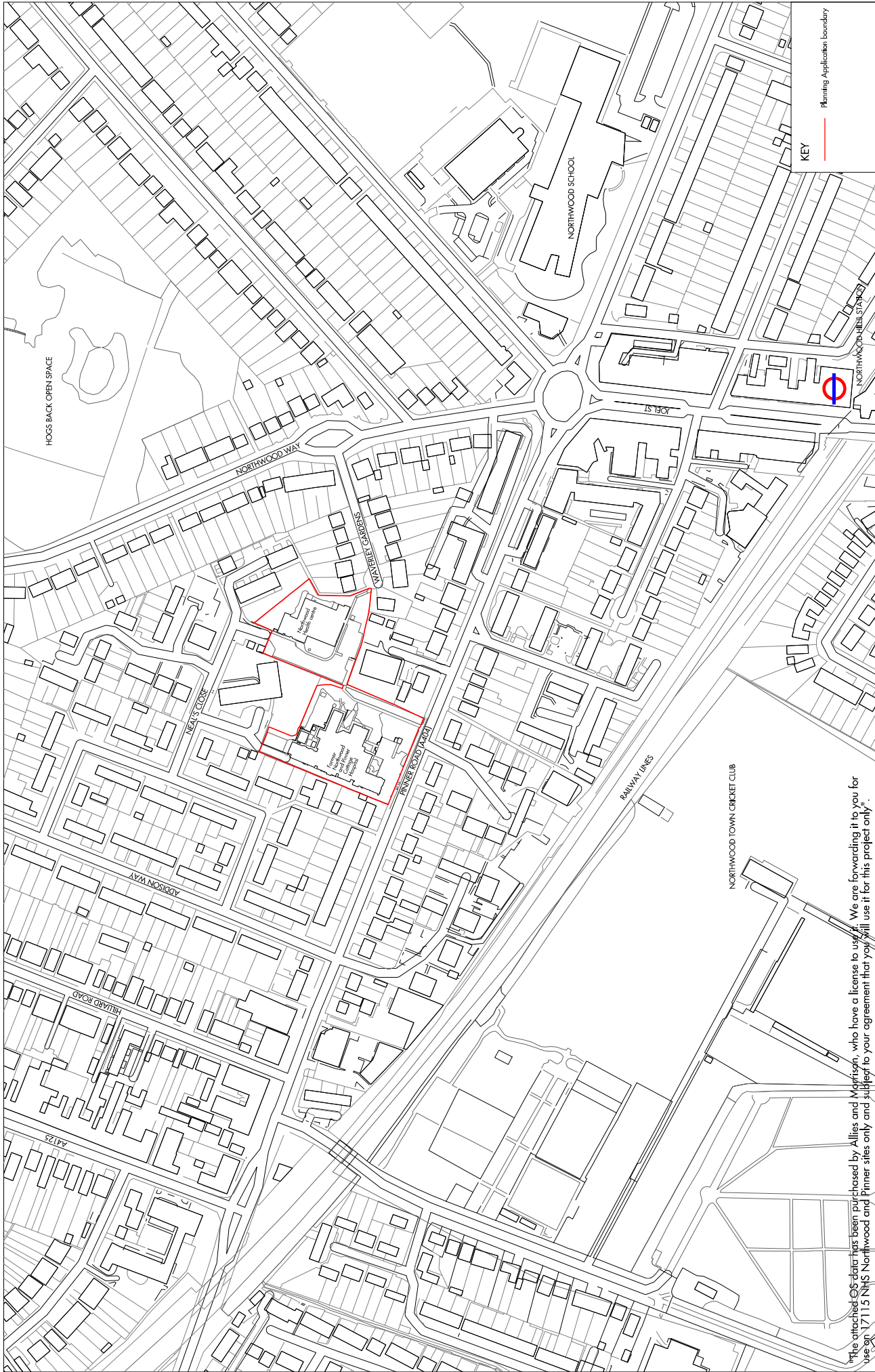
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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

APPENDIX 1.0

SITE LOCATION PLAN



The attached OS data has been purchased by Allies and Morrison, who have a license to use it. We are forwarding it to you for use on 17115 NHS Northwood and Pinner sites only and subject to your agreement that you will use it for this project only."

Allyes and Morrison LP
15, South Street
Barnet, London HA5 1JF
Telephone 020 7921 0100
Facsimile 020 7921 0101
email northwood@alliesandmorrison.com
AAW JOB NO: 17115_05
SCALE 1:1250 @A1 1:2500 @A2

NHS - NORTHWOOD AND PINNER, LONDON
SITE LOCATION PLAN
PLANNING
17115_05_00_07_001

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