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TfL Land Holdings at Northwood
Planning Statement

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Report

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TfL Landholdings at Northwood

Hybrid Planning Application

Planning Statement

October 2015

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Appendix 1 – Goad Plan Survey and Composition of Northwood District Centre

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Appendix 3 – Northwood Tenants Letter dated 15th September 2015

Appendix 4 – Local Open Space Audit and Playspace Strategy

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For and on behalf of GVA Grimley Ltd

Foreword

This foreword explains the following:

- The type of application that has been submitted;
- The documents that have been submitted; and
- What happens next.

The Application

A Hybrid Planning Application ('the Application') has been prepared for the redevelopment of Transport for London (TfL) landholdings at Northwood ('the site') and is submitted by TfL ('the Applicant'). A Hybrid Planning Application is one that seeks Outline Planning Permission for one part and Full Planning Permission for another part of the same site.

This Foreword has been prepared to explain how the many submission documents fit together in order to help stakeholders and interested parties navigate the Application.

The paragraphs below explain the purpose of the documents that have been submitted within the Application and the inter-relationship between them.

The Documents

The Application includes a number of documents that are submitted for approval which relate to the Proposed Development in its entirety and others that pertain only to the outline or detailed components.

The paragraphs below explain the purpose of each document, how they inter-relate with one another and how they have been used to define the Proposed Development.

A number of documents are submitted for approval ('the Primary Control Documents'), whilst others will provide background, illustrative and supporting information ('the Secondary Control Documents') to help the London Borough of Hillingdon (LBH) and Greater London Authority (GLA) reach their decision as to whether to grant permission for the application being made.

The Primary Control Documents

The document submitted for approval in respect to the entire Application is:

- **Red Line Boundary Plan**, identifying the extent of the Application Site (within which development is proposed) and the extent of land within the ownership of the Applicant.

The detailed component of the Hybrid Planning Application includes the following documents which are submitted for approval:

- **Detailed Plans, Sections and Elevations**, setting out in full how the detailed components will be developed, including full details on matters of layout, scale and appearance of the buildings, landscaping and access arrangements; and
- **Development Schedule**, setting out the quantity and mix of development proposed for the detailed components within the context of the site-wide allowable quantity and mix.

The outline components of the Hybrid Planning Application are set out within two Primary Control Documents which define the specified parameters of the proposed development and are submitted for approval. These comprise:

- **Parameters Plan**, defining the extent of the proposed buildings, routes and spaces against allowable deviations/tolerances.
- **Development Schedule**, setting out the type (uses) and quantity of development that could be provided within the context of the site-wide allowable quantity and mix.

The Secondary Control Documents

In addition to the above, other documents are submitted to provide information to help the LBH and GLA to consider the proposals and determine the Application. A full suite of supporting documents is submitted which relates to both the outline and detailed components of the Hybrid Planning Application.

A number of these documents make commitments and recommendations in order to make the Proposed Development acceptable. Where this is the case, it is clearly stated. The documents are as follows:

- **Illustrative Masterplan**, providing an indication of what the overall Proposed Development could look like. It is not submitted for approval, but shows one way in which a development of this type and scale proposed might fit within the specified parameters for the outline components, for which planning permission is sought;
- **Planning Statement**, explaining how the Proposed Development responds to the planning policies of London Borough of Hillingdon and the Mayor of London. It also sets out why the Proposed Development is being promoted and what benefits are expected to arise from it; and
- **Design & Access Statement (DAS)**, explaining the design evolution of the Proposed Development (both the detailed and outline components). The document explains how the amount, scale, layout, appearance, landscaping, inclusive design and community safety issues have been developed. It includes a landscape strategy, details of the access design and the evolution of the Illustrative Masterplan. It also includes illustrative design principles for the outline components of the application, along with associated landscaping and access.

A number of topic-based technical reports complete the suite of supporting documents, including for example a Transport Statement and Sustainability Statement.

The table below provides a complete schedule of the documents submitted as part of the Application.

Reference	Document Reference
Forms	
Application Forms and Ownership Certificates	N-01
CIL Forms	N-02
Background Documents	
Existing Site Layout & Sections	N-03
Topographical Survey	N-04
Primary Control Documents	
Red Line Plan	N-05
Development Schedule	N-06
Parameters Plan (Outline Component)	N-07
Plans & Elevations (Detailed Component)	N-08
Secondary Control Documents	
Illustrative Masterplan	N-09
Planning Statement	N-10
Design & Access Statement	N-11
Acoustic and Vibration Assessment	N-12
Affordable Housing Viability Statement	N-13
Air Quality Assessment	N-14
Arboricultural Survey	N-15
Arboricultural Impact Assessment & Method Statement	N-16
Daylight & Sunlight Assessment	N-17
Energy & Sustainability Statement	N-18
Flood Risk Assessment & Surface Water Drainage Strategy	N-19
GeoEnvironmental/GeoTechnical Assessment	N-20
Heritage Appraisal	N-21
Preliminary Ecological Appraisal (including Bat Inspections and Surveys)	N-22
Phasing Strategy	N-23
Statement of Community Involvement	N-24
Transport Assessment (including Framework: Travel Plan, Construction and Logistics Plan, Delivery and Servicing Plan and Car Park Management Plan)	N-25
Utilities & Foul Sewerage Assessment	N-26
Waste Management Plan	N-27
Verified Massing Views Report	N-28
Landscape Strategy Report	N-29

What Happens Next?

LBH will formally consult on the Applicant's proposals for a period of no less than 21 days once the application has been submitted, registered and validated. During this time, interested parties will have the opportunity to make any representations that they may wish to.

If you are an interested party and you have any questions about the Application that has been made, please direct these in the first to the LBH case officer dealing with the Application, Mandip Malhotra (mmalhotra@hillingdon.gov.uk) or to Tim Sturgess (tim.sturgess@gva.co.uk) and Nick Alston (nick.alston@gva.co.uk) at Bilfinger GVA, the Applicant's planning advisors.

1. Introduction

- 1.1 This planning statement has been prepared in support of a hybrid planning application ('the application') submitted October 2015. The application seeks planning permission for the redevelopment of TfL's landholdings at Northwood ('the site') in the London Borough of Hillingdon (LBH). The application is submitted by Bilfinger GVA (BGVA) on behalf of Transport for London (TfL) ('the applicant').
- 1.2 The application is submitted in hybrid form. It seeks part full planning permission (detailed components) and part outline planning permission (outline components) with all matters reserved except access.
- 1.3 The purpose of this statement is to set out the planning rationale that underpins the proposed development and to demonstrate its acceptability in planning terms.
- 1.4 This statement is structured as follows:
- **Section 2: The Site** – provides a brief background to the application proposal and describes the site and its surroundings;
 - **Section 3: Proposed Development and Application Specification** – describes the proposed development and the application specification;
 - **Section 4: Planning Context** – sets out the national, regional and local planning policy framework against which the application is to be considered. This section also outlines the pre-application consultation process that has been on-going throughout the proposals development;
 - **Section 5: Pre-Application Consultation** – outlines the extensive pre-application undertaken with the local community, stakeholders, London Borough of Hillingdon and the Greater London Authority.
 - **Section 6: Tenant Engagement** – outlines the engagement that the applicant has undertaken with existing tenants prior to submission of the application.
 - **Section 7: Planning Assessment** – evaluates the application proposal in the context of relevant planning considerations;
 - **Section 8: Planning Obligations** – Considers CIL and s.106 matters; and
 - **Section 9: Conclusions** – summarises our conclusions in support of the application proposals.

2. The Site

Description

- 2.1 The site extends to 1.91 ha, and is outlined in red on the Site Location Plan which accompanies the application.
- 2.2 The site is located on the junction of Green Lane (B469) and Eastbury Road in Northwood, London Borough of Hillingdon. It comprises land north and south of Green Lane including part of the highway. The area of land north of Green Lane comprises a parade of single storey retail units spanning over the railway bridge with a two storey adjoining unit on the corner of Eastbury Road. The northern part of the site is bounded by the Eastbury Surgery to the north, Green Lane to the south, Eastbury Road to the East and the retail units on the bridge to the west.
- 2.3 The majority of the site lies south of Green Lane, and comprises the existing underground station and a mix of A-Class uses, residential flats, vehicle repair workshop, dental practice, area of surface car parking and associated access road (which includes a bus stop/stand and turning facilities). The southern part of the site is bounded by Green Lane to the north, the London Underground compound to the south, the railway line to the west, and the rear boundaries of the Northwood Central Club, St John's United Reformed Church and residential properties fronting Hallowell Road to the east.
- 2.4 The site currently comprises the following existing uses:
- Commercial units (Class A1-A5, D1 and B2);
 - 14 residential flats located above the commercial units (Class C3);
 - Northwood London Underground (LU) Station (Sui Generis); and
 - Car Park operated by NCP (Sui Generis).
- 2.5 Appendix 1 identifies the extent of existing uses and current occupiers at the site as surveyed on 20th October 2015.
- 2.6 The site has a Public Transport Accessibility Level (PTAL) rating that ranges from 3 in the north of the site to 2 further south. It includes Northwood Underground Station (London Underground Metropolitan Line, Zone 6), and is directly served by London Bus routes 282, 331 and H11 as well as Arriva route 8. Routes 282, H11 and 8 provide eastbound and westbound services with stops located along Green Lane connecting the surrounding areas of Uxbridge, Ruislip, Harrow and Watford. Route 331 utilises the existing turning circle and Station Approach bus stop

within the site. The site is located approximately 9km to the south-east of Junction 18 of the M25, and 10 km to the south-west of Junction 5 of the M1.

- 2.7 No statutory or locally listed buildings are present on site. The northern part of the site falls within the Northwood District Centre (secondary frontage) and the Northwood Town Centre, Green Lane Conservation Area. The Northwood, Frithwood Conservation Area (north east) and Old Northwood Areas of Special Local Character (east) are located adjacent to the site. The site is located within Flood Zone 1.

Context

- 2.8 The history of the sites transport use dates back to the late 19th century, with the first station opening in 1887. The Metropolitan line brought significant growth to the area and the station was rebuilt by London Underground (LU) in 1961 in order to include platforms on the new Watford line, rather than the Amersham line. Whilst the existing LU station remains a functional building it lacks efficiency and fails to comply with TfL's modern aspirations to improve accessibility to its network, i.e. the current lack of step-free access.
- 2.9 The surrounding existing buildings which fall within TfL's landholdings around the LU station are reaching the end of their useful life and will require substantial maintenance/renovation works. Therefore, as part of their aspirations to improve the LU station, TfL has commissioned a design team to bring forward a comprehensive development of its landholdings that delivers TfL's strategic aspirations to improve its transport network whilst benefitting Northwood, the local community and its stakeholders.
- 2.10 Through comprehensive redevelopment of their landholdings at Green Lane, it is TfL's intention to create an exemplar scheme which benefits Northwood, whilst also allowing TfL to carry out the improvements necessary to keep their stations, railway lines and associated infrastructure capable of meeting the ever-increasing demand placed on them.

Northwood

- 2.11 Northwood is a suburban settlement situated in north-west London, within the administrative area of London Borough of Hillingdon (LBH). It is located approximately 38 km north-west from Central London and 9 km south-west of Watford.
- 2.12 Northwood is designated as a District Centre by the adopted LBH Local Plan Part 1: Strategic Policies document (Local Plan Part 1). The extent of the centre boundary and secondary frontages are proposed to be designated as part of the emerging Local Plan Part 2: Development Management Policies, Site Allocations and Designations and Policies Map (Local Plan Part 2). No changes are proposed from the previous boundary/frontages as

previously designated by the Unitary Development Plan. The Goad Plan which identifies the currently retail composition and health of the centre is enclosed at Appendix 1, surveyed on 20th October 2015 identifies the current composition and the health of the centre. The centre's vitality and viability is considered in Section 7 of this statement.

- 2.13 A full appreciation and analysis of the history and character of Northwood is set out within the accompanying Heritage Appraisal, prepared by Portico Heritage. This should be read alongside the Design and Access Statement, prepared by Fletcher Priest Architects.

3. The Proposed Development and Planning Application Specification

- 3.1 The purpose of this section is to describe the proposed development for which planning consent is sought and to set out the 'specification' of the planning application.

Description of Development

- 3.2 Planning permission is sought for the following:

"Hybrid planning application for comprehensive redevelopment of the site comprising full planning permission involving demolition of existing buildings to provide 93 residential units (C3) and associated car parking, 1,440 sq.m retail (A1-A5), a new operational station (Sui Generis) with step free access and associated car parking for the station; new bus interchange, and a new piazza. Outline planning consent for up to 34 residential units, car parking (all matters reserved apart from access) and refurbishment works to existing retail units along Station Approach."

- 3.3 In summary, the proposed development comprises:

- A new ticket hall to Underground Station with step-free access;
- Improved accessibility for all users around the station;
- Improved interchange at the transport hub between underground trains, buses, vehicle users, pedestrians and cyclists;
- 298 parking spaces (including 180 public spaces);
- 306 cycle parking spaces (including 28 public spaces);
- A dedicated area for drop off/pick up and taxis;
- Demolition of existing buildings (within the conservation area);
- 127 new residential units comprising 93 apartments (detailed) and 34 townhouses (outline);
- A new public space in the form of a piazza;
- 1,440 sq.m A1-A5 retail space which will improve and enhance the vitality and viability of the existing centre;
- External works associated with refurbishment of retained existing units; and
- Associated site preparation and infrastructure works.

- 3.4 The development is to be brought forward in phases which will allow the underground station to remain fully operational for the duration of the project. This is set out within the Phasing Strategy, prepared by Buro Happold (BH) which accompanies this application and explained further in Section 7 of this statement.

Type/Form of the Application

- 3.5 The application is submitted in hybrid form. Full planning permission is sought for part of the development and outline planning permission (with all matters reserved except access) is sought for the remainder.

Full Application

- 3.6 Full planning permission is sought for demolition of the existing buildings and the provision of 93 residential units (C3) and associated car parking, 1,440 sq. m retail (Class A1-A5), a new operational station (Sui Generis) with step-free access and associated car parking, new bus interchange and a new public piazza, as well as refurbishment works to existing retail units along Station Approach.

Outline Application

- 3.7 Outline planning permission is sought for the remainder of the proposed development, hereafter referred to as the 'outline components'. With respect to the outline components, all matters are reserved for approval at a later date, except for access. The outline components comprise the provision of up to 34 residential units (townhouses) and associated car parking and landscaping.

Amount

- 3.8 The amount of development (for which planning permission is sought) is set out in the Development Schedule (and as described above).

Access

- 3.9 Details of the proposed access arrangements are provided in the accompanying highways plans, prepared by Buro Happold. Approval is sought for means of access to the site (Central Way) via a new junction south of Green Lane. This is as per the proposed highway arrangements as indicated on the proposed detailed plans.

Scale

- 3.10 Details of the proposed scale of development are provided in the plans and elevations for the detailed components (see the detailed plans and elevations). Details of scale for the outline components are reserved for future determination. However, approval is sought for scale parameters as defined on the Parameters Plan.

Layout

- 3.11 Details of the proposed layout of development are provided in the plans for the detailed components (see the detailed plans and elevations). Details of layout for the outline components are reserved for future determination. However, approval is sought for layout parameters as set out on the Parameters Plan, which defines Development Zones within which buildings may be sited, and zones within which streets must be sited.

Landscaping

- 3.12 Details of the proposed landscaping are provided in the plans for the detailed components (see detailed landscaping plans). Details of landscaping for the outline components are reserved for future determination. However, approval is sought for landscaping parameters as defined on the Parameters Plan.

Appearance

- 3.13 Details of the proposed appearance of development are provided in the drawings for the detailed components and in the landscape plans. Details of external appearance for the outline components are reserved for future determination.

Planning Application Package

- 3.14 The planning application package comprises a completed application form (with associated certificates, notices and fee payment), plans/documentation for approval, and supporting plans/documentation.
- 3.15 The following plans and documents are submitted for approval:
- **Site Location Plan** (document ref: N-05) – A plan showing the application site boundary
 - **Development Schedule** (document ref: N-06)– This presents the type and quantity of development for approval, including floorspace, units and housing mix
 - **Parameter Plan Zone B: Outline Application** (document ref: N-07)
 - **Detailed Plans and Elevations** (document ref: N-08)
- 3.16 The following plans/documents are submitted in support of the application:

- **An Illustrative Masterplan** (document ref: N-09) – This illustrates how the proposed development could come forward within the proposed parameters;
- **Planning Statement** (document ref: N-10) – This justifies the proposed development in planning terms;
- **Design & Access Statement** (document ref: N-11) – This statutory document explains and justifies the proposed development with reference to the detailed drawings, Parameter Plans and Illustrative Masterplan;
- **Acoustic and Vibration Assessment** (document ref: N-12) – This presents the findings of the noise and vibration surveys and includes proposals/commitments necessary to ensure the protection of the existing sensitive receptors, and to make the proposed development acceptable in acoustic terms, as appropriate;
- **Affordable Housing & Viability Statement** (document ref: N-13) – This present the findings of the viability assessment and implications for affordable housing;
- **Air Quality Assessment** (document ref: N-14) – This presents the findings of the air quality monitoring and modelling and includes proposals/commitments necessary to ensure the protection of the existing area and to make the proposed development acceptable in air quality terms, as appropriate;
- **Arboricultural Survey** (document ref: N-15) – This presents the findings of the tree survey;
- **Arboricultural Impact Assessment and Method Statement** (document ref: N-16) – This presents the impact of the proposed development on trees and recommendations for the level of protection required for trees to be retained during the proposed works;
- **Daylight/Sunlight Assessment** (document ref: N-17) – This presents the findings of the assessment of daylight and sunlight availability for the proposed development and existing windows and amenity spaces;
- **Energy and Sustainability Statement** (document ref: N-18) – This presents the results of the energy assessment conducted for the proposed development and the strategy for providing sustainable development and energy provision;
- **Flood Risk Assessment & Surface Water Drainage Strategy** (document ref: N-19) – This presents the findings of the flood risk assessment and strategy for providing surface water drainage infrastructure, including the provision of sustainable urban drainage system (SUDs);
- **Phase 1 Geoenvironmental and Geotechnical Desk Study** (document ref: N-20) – This assessment identifies the existing conditions and potential environmental risks and includes proposals/commitments necessary to ensure the proposed development is acceptable in geoenvironmental/technical terms, as appropriate;

- **Heritage Appraisal** (document ref: N-21) – This appraisal quantifies the existing context of the site and surrounding area and justifies the proposals in respect of heritage terms;
- **Preliminary Ecological Appraisal (including Bat Inspections and Surveys)** (document ref: N-22) – This reports the findings of the desk study and extended Phase 1 habitat survey to gather baseline ecological data for the site and proposals to ensure the proposed development is acceptable in ecological terms, as appropriate;
- **Phasing Strategy** (document ref: N-23) – This document outlines the phasing strategy for the proposed development;
- **Statement of Community Involvement** (document ref: N-24) – This reports on how the public and stakeholders have been engaged and consulted on the proposed development, and explains how feedback has been accounted for in the planning application proposals;
- **Transport Assessment (including Framework: Travel Plan, Construction and Logistics Plan, Delivery and Servicing Plan and Car Park Management Plan)** (document ref: N-25) – This justifies the proposed development in transport terms and includes proposals/commitments necessary to ensure access to the site and to make the proposed development acceptable in transport terms, as appropriate;
- **Utilities & Foul Sewerage Assessment** (document ref: N-26) – This summarises the findings of the utilities survey and presents the strategy for providing utilities to support the proposed development, including foul drainage infrastructure;
- **Waste Management Plan** (document ref: N-27) – This presents the strategy for providing managing operational waste across the site;
- **Verified Massing Views Report** (document ref: N-28) – This details verified views of the proposed development around the site; and
- **Landscape Strategy Report** (document ref: N-29) – This presents the landscape strategy for the detailed element of the proposed development.

3.17 The above application package is in full accordance with published national and local validation requirements and has been agreed with the LBH officers in advance.

4. Planning Context

- 4.1 This section sets out the planning history, existing lawful use, and policy framework (including other material considerations) against which the planning application should be determined.

Planning History and Existing Lawful Use

- 4.2 The site comprises a mix of existing lawful uses comprising Class C3, A1-A5, D1 and B2 use, as well as Sui Generis. A full list of the existing uses and occupiers is enclosed at Appendix 1.
- 4.3 The site has a long planning history associated with the London Underground station and town centre uses. However, there is no history of any particular relevance in the context of the development proposed by this application. The principle of the proposed land uses are already established in planning terms on the application site.

Policy Framework

Adopted

- 4.4 The National Planning Policy Framework (NPPF), published 27 March 2012, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is the framework beneath which local and neighbourhood plans sit and which respond to the needs and priorities of local communities. It sets out a presumption in favour of sustainable development (Para 14). This means that development which is sustainable should be approved without delay (Para 15). The NPPF requires that in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development (Para 197).
- 4.5 In accordance with Section 38(6) of the Planning and Compulsory Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan is the London Plan (2015) and the London Borough of Hillingdon (LBH) Local Plan Part 1: Strategic Policies (2012) and the Unitary Development Plan Saved Policies (2007).
- 4.6 In March 2014 the Government published National Planning Practice Guidance (NPPG) which provides updated guidance to be read in conjunction with the National Planning Policy Framework (NPPF).

- 4.7 Alongside the London Plan (2015), the GLA has also published a range of Supplementary Planning Guidance/Documents, and those that are of relevance have been considered in the preparation of the Application.
- 4.8 The suite of Supplementary Planning Guidance Documents (SPG) and Supplementary Planning Documents (SPD) adopted by LBH are also relevant, including the Accessible Hillingdon SPD (2010), Planning Obligations SPD (2014), Hillingdon Design and Accessibility Statement SPD (2006), Affordable Housing SPD (2006) and Noise SPD (2006). It is noted that some of this guidance is dated. Therefore, in accordance with the NPPF it will only be considered relevant where it is consistent with national planning policy.

Emerging

- 4.9 The draft Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map (draft Local Plan Part 2). Once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (Local Plan Part 1).
- 4.10 The draft Local Plan Part 2 was published for public consultation between 22 September and 4 November 2014. In the interests of engaging in the plan-led approach, BGVA submitted representations of behalf of TfL promoting the site for mixed-use redevelopment on the 4th November 2014.
- 4.11 On 24 September 2015, Cabinet gave approval to undertake further consultation on proposed changes to the proposed submission version of the Local Plan Part 2. Consultation commenced on 26 October and will end on 8 December 2015. Following the consultation, it is LBH's intention that the Local Plan Part 2 documents and comments received will be submitted to the Secretary of State for Communities and Local Government for public examination.

Site/Area Specific Policies

- 4.12 The site is not allocated for development by the development plan, but the proposed changes to the proposed submission version of the Local Plan Part 2 proposes to allocate the site for mixed-use development (ref: SA16).
- 4.13 The site falls within Northwood District Centre, as designated in the Hillingdon Local Plan Part 1. Part of the site also falls within the Secondary Shopping Area, as designated within the Saved Policies Unitary Development Plan (UDP).

- 4.14 The draft Local Plan Part 2 proposes to define Northwood's district centre boundary and shopping frontages. It is noted that these reflect the existing boundary and shopping frontages approved under the saved UDP policy.
- 4.15 The northern part of the site falls within the Northwood Town Centre, Green Lane Conservation Area. The Northwood, Frithwood Conservation Area (north east) and Old Northwood Areas of Special Local Character (east) are located adjacent to the site. An overlay of these designations on and adjacent to the site is set out within the accompanying Design and Access Statement.

5. Pre-Application Consultation

- 5.1 TfL and the wider project team have undergone a robust and comprehensive process of pre-application consultation throughout the proposal's development. This has involved extensive engagement and consultation with the local community and stakeholders; pre-application discussions with the LBH and GLA and consultation with TfL's Operations teams.
- 5.2 This section provides a summary of all pre-application consultation undertaken to date.

Public and Stakeholder Engagement

Local Community

- 5.3 During the public exhibition held in September 2015, it came to our attention that Northwood's Voice, a local objection group, commenced a petition. Within this petition, a number of inaccurate statements were made regarding landlord and tenant matters, alongside the environmental impacts of the scheme. On the 7th October 2015, TfL responded to all points made, this is in Appendix 2.
- 5.4 A comprehensive and robust public engagement strategy was incorporated throughout the duration of the proposal's development, with a total of 2,336 people attending the various events. A Statement of Community Involvement (SCI), prepared by Make:Good accompanies the application. The SCI provides full details of the extent of the community engagement with the local community and stakeholders.
- 5.5 In summary, the process has been split into three phases:
- **Phase 1 Gathering Insight** - involved an open dialogue process inviting feedback on what people felt were the opportunities and concerns around change on Transport for London's (TfL) land holdings at Northwood. This phase aimed to establish if there was a local appetite for change and if so what the key community parameters would be.
 - **Phase 2 Feasibility Study** - using the insight gathered in phase 1 alongside other technical data gathered by the project team, two visions were created with the aim of establishing a preferred vision that balanced the needs of TfL and the local community.
 - **Phase 3 Pre-Planning** - taking the preferred vision from phase 2 (vision 2), this was then developed further into a final proposal. The last phase was an opportunity for people to comment on the various design elements, talk through the proposals with the design team and establish an understanding of the level of local support for the scheme prior to submission.

5.6 The timeline of events listed below identifies the extent of public engagement that all contributed towards shaping the final proposed scheme:

- **2nd July 2014**, TfL and Northwood Futures launched the extensive community engagement approach.

Phase 1

- **July-October 2014**, Northwood Futures held weekly open days in 65 Green Lane and shared information online, 1,504 individuals to the in the local area responding.
- **End October 2014**, Local people were invited to a series of workshops with the consultant team to discuss the issues in more detail.
- **4th November 2014**, Phase 1 of Northwood Futures closed with a public meeting and online update.
- **November 2014**, Project team prepared initial design in response to information received in Phase 1.

Phase 2

- **27th-31st January 2015**, public exhibition held in 65 Green Lane presenting the two visions for the scheme. A total of 1,781 people responded to the event, with 80% of respondents stating a preference for Vision 2.
- **March 2015**, TfL Board approves Vision 2.

Phase 3

- **May 2015**, full design team is appointed and detailed design work commences.
- **June 29th-1st July 2015**, Public exhibition held in St John's Church and online sharing design progress.
- **September 29th-3rd October 2015**, Pre-planning public exhibition in 65 Green Lane and online.

LBH Formal Pre-Application Advice

5.7 The applicant has undertaken extensive pre-application consultation with the LBH which has informed the design evolution of the scheme. Initial pre-application discussions took place in May 2015 with LBH planning and design officers to discuss the principle of the proposed scheme.

5.8 A series of bi-weekly meetings including further pre-application meetings with planning and conservation/design officers, and focussed engagement with LBH's officers on highways, access, air quality, noise and sustainability have taken place up to October 2015. In addition

to these meetings, separate focussed meetings have taken place between the architect and design officers to discuss the progression of detailed design matters. Further information on this is provided within the Design and Access Statement, and where principles or scopes have been agreed with officers these are clearly set out within the relevant statements which accompany this application.

GLA Formal Pre-Application Advice

- 5.9 As part of the on-going consultation process during the design evolution of the proposed development, formal pre-application advice was sought from the GLA. A pre-application planning meeting was held on the 14th September 2015 with key officers to discuss the strategic position on the key issues, being: principle of development; housing, urban design, energy and transport.
- 5.10 Formal written feedback was received dated 20th October 2015 which the proposal positively respond to, as summarised below.

Principle of Development

- **Retail** - The proposed quantum of 1,436 sq.m A1-A5 floorspace (quantum at the time of pre-application submission) is considered to strengthen the district centre and is supported in strategic terms.
- **Transport** - The proposed new Underground station ticket hall with step-free access and a better interchange at the transport hub between different transport modes is supported in strategic terms.
- **Housing** - The proposed quantum of housing will make a significant contribution to meeting the London Plan target (559 homes per annum in the Plan period 2015-2025 for LBH), and therefore, the principle of the redevelopment of this site for housing was supported in strategic terms.

Housing and Affordable Housing

- **Affordable Housing** - affordable housing would be subject to viability, but the maximum reasonable amount should be provided on-site as proposed which was supported.
- **Housing Choice** - The proposed provision (29% of 3+ bed family homes at the time of the pre-application submission) was supported on site, with affordable family homes encouraged. The provision of family housing has been increased as part of the application submission as detailed within Section 7 of the statement.

- **Density** - It was advised that the applicant follows the guidance laid out in the London Plan Housing SPG (2012) which ensures the density implications of mixed uses are taken into account. This has been addressed in Section 7 of this statement.

Urban Design

- **Urban Design** - The proposed scheme involves the replacement of Station Approach with Central Way further to the east and the demolition of existing buildings on Station Approach. It was recognised that none of the buildings on site are listed. However, the former bank building at the corner of Station Approach and Green Lane (currently occupied by Coral) is recognised as currently making a positive contribution to the Green Lane Conservation Area. Although officers noted the loss of this building would be regrettable, the case which justifies its loss is accepted given the considerable public benefits the scheme will create (i.e. provision of additional housing in a town centre location in a well-designed development).
- **Active Frontage** - In response to comments raised at the meeting, further changes were made to the Central Way frontage which has added to the activation of that frontage through the inclusion of a residential access, facilities management suite and a green wall, which has been welcomed by Officers.
- **Height/Massing** – the proposed height and massing across the development is considered appropriate given its transport accessibility and town centre location.
- **Appearance** - The overall appearance of the proposed scheme is supported and recognised as being of high-quality.
- **Quality** – The proposal to far-exceed the Mayor's space standards where possible was welcomed. The town houses submitted in outline are also welcomed and recognised as having the potential to also provide good residential quality and a defined public realm.
- **Inclusive Design** – The proposal for step-free access at the LU station is supported.

Climate Change / Energy

- **Energy Efficiency** - The proposal to meet Part L 2013 standards by efficiency measures alone is supported. The proposed single energy centre for the apartment blocks and commercial units, and individual gas boilers for the townhouses is also supported.
- **Sustainability/Energy** - The overall strategy of fabric, CHP and PV panels to meet the policy requirements in respect of energy is supported.

Transport

- **Parking** - The proposed overall quantum of car and cycle parking provision on-site is supported.

- **Accessibility** - The proposals to improve pedestrian accessibility and the transport hub interchange is supported in principle.

Summary

- 5.11 In summary, pre-application advice from the GLA confirms that there is support for the proposed development. Some minor comments were issued in relation to the accessibility of the scheme, and these have been addressed as part of the proposed application.

6. Tenant Engagement

- 6.1 TfL has liaised with the tenants throughout the entire process which commenced in 2014. This has included a significant amount of one to one discussions, and also wider public meetings attended by the tenants to discuss the evolving proposals. The proposals presented to date have been the culmination of 18 months dialogue with the local community, resulting in a scheme which delivers on their aspirations. As discussed within this Statement, the scheme proposes a retail offer that accommodates the food and beverage sector, which has been driven by the local community.
- 6.2 As part of this process, TfL met with the tenants in 2014 through one-to-one meetings to understand their concerns associated with the former development scheme, and also to understand the development opportunities and constraints associated with any future scheme.
- 6.3 Following the appointment of the project team in September 2014, at the request of the local community, a number of workshops were held throughout October and November, followed by a public consultation event in January 2015 whereby two visions were presented. Throughout this process, the tenants were regularly informed and encouraged to participate in these events.
- 6.4 Following the local community's clear support for vision two in January 2015, TfL instructed the project team to progress this to the preparation of a planning application.
- 6.5 In addition to the consultation undertaken with existing tenants, any new tenants to the estate in the last year were made fully aware of development proposals and timescales, in advance of signing the lease.
- 6.6 In May 2015, TfL met with the tenants to discuss the outcomes of the January exhibition along with the programme of activities that would be undertaken over the coming months, namely:
- A public exhibition in June/ July 2015;
 - A public exhibition in September/October 2015;
 - the submission of the planning application;
 - the possible determination period; and
 - Outcomes of the planning application in respect of a refusal or approval.
- 6.7 During the Public Exhibition period held at St John's Church between June 29th and 1st July 2015, two key questions regarding the retail provision were raised by TfL, namely:

- What was the desired retail proposition for the proposed square; and
- What local retail categories should be accommodated in the proposed development.

6.7.1 Some category uses were viewed unfavourably, such as the late night bar, and fast food outlets; whilst others were seen as in plentiful supply in Northwood, such as estate agents. However the community feedback identified four local priority uses which should be accommodated within the proposed scheme, namely:

- Barbers;
- Dry Cleaners;
- Cobblers; and
- Post Office.

6.8 On the 6th July 2015, TfL attended a meeting with all Tenants. This meeting was attended by TfL Head of Property Development and TfL Senior Category Manager. The transcript of the meeting was made publicly available on the NorthwoodFutures website to ensure transparency regarding those discussions.

6.9 TfL relayed the feedback received from the July exhibition and explained a series of intervention measures and commitments which would be undertaken, namely:

- seek to accommodate the four category uses within TfL's estate in Northwood, however in line with TfL's legal requirements, would be advertised on the open market. These uses could be accommodated as part of the proposed scheme, namely 1 Eastbury Road which will comprise three retail units or alternatively, TfL's existing vacant stock;
- The appointment of a Senior Category Manager whom would work with, and support the existing businesses. This includes assistance in reviewing their existing business efficiency; formulating business plans; preparing bid documentation in response to vacant unit tenders; and understanding lease terms/ durations;
- enable early release or extension for those who wish to relocate or remain, until September 2017 to allow further solutions for business continuity to be agreed.
- consider options surrounding relocation, such as turnover leases (i.e. TfL sharing any risk), or rent-free periods to cover fit-out and relocation costs; and
- Project phasing to ensure continuation of business. The planning proposal as currently drawn illustrates 1 Eastbury Road as the first phase of development, this seeks to redevelop Blockbusters for affordable housing on upper floors with three retail units at ground floor. The rest of the properties on the bridge structure will be subject to minor refurbishment works to the shop fronts. There is an opportunity for a number of businesses to relocate in advance of any wider redevelopment, therefore safeguarding continuous operations.

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- 6.9.1 TfL's Senior Category Manager has continued to provide existing tenants the opportunity to engage throughout the summer months, prior to the submission of the application.
- 6.9.2 On the 7th September, TfL sent a letter to all tenants (Appendix 3), again inviting them to engage. Following this, public consultation was undertaken and all tenants were personally invited to attend the event and share their views.
- 6.10 TfL is committed to engaging with the existing tenants. Furthermore, TfL has publicly committed to a series of intervention measures (listed above), which have to date, been put in place. TfL will continue to engage with the tenants throughout the lifecycle of the project and implement the intervention measures in place.

7. Planning Assessment

- 7.1 This section reviews the Application being made and assesses it against the relevant planning considerations set out in national, strategic, and local planning policy.
- 7.2 It assesses both the outline and detailed components submitted as part of the Hybrid Planning Application.
- 7.3 It assesses the following key planning considerations in turn:
- Principle of mixed use development;
 - Housing (amount, loss of existing housing, density, housing mix, affordable housing and housing quality);
 - Retail uses (loss of existing retail, proposed quantum and uses);
 - Loss of other existing uses;
 - Open space/Playspace;
 - Design and Heritage;
 - Environmental and technical (acoustic, air quality, arboriculture, daylight/sunlight, ecological, flood risk and drainage, geoenvironmental and utilities and energy and sustainability);
 - Transport and accessibility; and
 - Community aspirations.

Principle of Mixed Use Development

- 7.4 The principle driver of the proposed development is to improve the transport infrastructure provision in Northwood, specifically inclusive/step-free access within the LU station which is a London-wide strategic objective. This site also offers the opportunity to improve the vitality and viability of the district centre and to increase housing supply within the borough. Critically the delivery of this new ticket hall, which will bring the benefit of inclusive/step-free access and improved facilities to the LU station which is reliant upon the inclusion of residential and commercial floorspace. The inclusion of this floorspace is required to fund the LU station improvements. Therefore, each of the proposed uses are considered to be dependent upon one another.
- 7.5 The Proposed Development is considered to be entirely consistent with the Core Planning Principles set out in the NPPF (2012).
- 7.6 At the heart of the NPPF is a presumption in favour of sustainable development. This means that development proposals that accord with the development plan should be approved without delay (Para 14). It is considered that the Proposed Development should benefit from the presumption in favour of sustainable development insofar as it accords with national, regional and local planning policy requirements to proactively drive and support sustainable economic development that delivers the homes, businesses, infrastructure and thriving local places that the country needs; encourages the effective use of land by reusing land that has previously been developed (brownfield land); promotes mixed use development and encourages multiple benefits from the use of land in an urban area; and focuses significant development in locations which are or can be made sustainable (Para 17).
- 7.7 The site is brownfield land, in a district centre location, well served by public transport (underground and buses), and located in an area which is subject to significant housing need. As such, the principle of redeveloping the site for residential-led mixed-use development is firmly supported by the provisions of the NPPF.
- 7.8 The proposed development provides a major opportunity to deliver a comprehensive mix of uses, providing new homes, commercial spaces, communal open space and a new improved accessible underground station. This comprehensive redevelopment will result in social, economic and environmental benefits that will be of local and wider borough significance. Accordingly, the principle of comprehensive redevelopment of this site for the proposed mix of uses and quantum of development is considered to be firmly supported by planning policies operating at all levels.
- 7.9 Numerous discussions have also been undertaken between the applicant (and its advisors) and London Borough of Hillingdon (LBH) and Greater London Authority (GLA). It has been
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confirmed through these discussions that the comprehensive redevelopment of the site is acceptable in principle. Furthermore, the site (known as Northwood Station, Green Lane) is proposed to be allocated (ref: SA16) for mixed use redevelopment in the emerging Local Plan Part 2. This draft allocation supports the proposed redevelopment of Northwood Station to deliver an improved interchange and step free access; residential and retail uses; a public space; and commuter car parking.

- 7.10 Therefore, any harm which may arise as a result of the proposed development can be successfully mitigated (discussed further in this Section), then the principle of the proposed development is considered to be acceptable as it accords with the adopted development plan, which in accordance with the NPPF should be approved without delay (Para 15).

Transport Infrastructure

- 7.11 The principle of the proposed development is also supported by the core planning principle (Para 17) that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- 7.12 London Plan Policy 6.1 reflects the NPPF's strategic approach to transport by encouraging patterns and nodes of development that reduce the need to travel and improve the capacity and accessibility of public transport, walking and cycling. The policy also states that relevant development should improve the interchange between forms of transport, particularly around major rail and Underground stations. Local Plan Part 1 Policy T1 also encourages development to locate in the most appropriate/accessible locations.
- 7.13 The proposed development will improve transport accessibility at the site directly through the delivery of new facilities at Northwood LU station including step-free access to the station platforms and from the car park, and a new station ticket-hall.
- 7.14 The re-provision of the commuter car park will continue to provide with an income generator required to assist TfL with the on-going funding its transport network. It also performs an important strategic role in providing wider access for the surrounding suburban area to its network.
- 7.15 The wider development of TfL's landholdings will also create improvements to the existing transport network an improved public transport interchange between the LU station, LU buses and pedestrian/cycle environment and will maximise the opportunity to provide new accessible new homes and town centre uses.

7.16 Therefore the principle of the development in transport terms is supported by all levels of policy. The potential impacts of the proposed development on the transport network are considered further in this Section below.

Housing

Amount

- 7.17 The NPPF Core Planning Principles (Para 17) state that decision making should proactively drive and support sustainable development to deliver the homes “*that this country needs*”. To contribute to the achievement of sustainable development, one of the key objectives of the NPPF is to boost the supply of housing required to meet the needs of present and future generations whilst delivering a wide choice of high quality homes, widening opportunities for home ownership, and creating sustainable, inclusive and mixed communities. This is one of the key themes that runs throughout the NPPF and is a central area of focus for Government as it seeks to deliver substantial numbers of new homes as part of its focus on delivering economic growth and prosperity.
- 7.18 Policy 3.3 of the London Plan (2015) refers to increasing the supply of new homes and states that the Mayor will seek to ensure that housing need is met. It recognises the pressing need for more homes across London. Policy 3.3 requires Boroughs to achieve and **exceed** their minimum annual average housing target. In addition, it states that Boroughs should realise the potential opportunity for brownfield housing capacity to be brought forward.
- 7.19 At the local level, LBH Local Plan Part 1 Policy H1 states that the borough’s current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021. This was previously reflective of the London Plan (2011) which has since been superseded. The London Plan (2015) increased LBH’s annualised housing target from 425 residential units to 559 units per annum, in order to deliver the minimum of 5,590 units required over the period 2015 to 2025.
- 7.20 LBH published a background paper relating to its Five Year Housing Land Supply in March 2015 to inform its emerging Local Plan Part 2. The report sets out the most up-to-date published housing supply position for the borough.
- 7.21 The current monitoring target for Hillingdon is set out against the London Plan (2015) housing target of 559 units per annum. This equates to 2,795 net additional homes over 5 years. Including a 5% buffer (consistent with the NPPF) the Council is required to deliver 2,935 additional homes (587 units per annum). The report highlights that LBH is only able to identify a deliverable supply of 2,781 units over the next 5 years which, when compared to identified need, equates to a 5-Year housing land supply of 4.74 years. Accordingly, LBH is currently unable to demonstrate a deliverable supply of housing land in line with the requirements of the NPPF. Whilst this shortfall is not significant it is still relevant.

- 7.22 The principle of housing on this site is supported by national, strategic and local policy in that it will contribute to the pressing need to deliver more homes within the borough and in London. The site is currently underutilised and within a sustainable location within a district centre, with a LU station on site and numerous local bus services, which are proposed to move closer to the site achieving the higher standards of urban design and in ensuring scheme viability.
- 7.23 The application proposes a total of 127 new dwellings. This quantum has been derived from a design-led approach has been taken to inform the proposals for the site, underpinned by the policy objective of optimising housing potential having regard to the considerations identified above (i.e. centre location, brownfield land, accessibility).
- 7.24 The proposed development would provide a substantial contribution towards achieving the GLA and LBH housing targets for the provision of new homes within the borough through a windfall site. Whilst the density is assessed below, the overall amount is considered appropriate in the context of optimising the use of the site.
- 7.25 Therefore, as outlined above, the proposed quantum will deliver on sustainable objectives to meet housing targets where there is an identified need, and is therefore in accordance with the relevant national, strategic and local planning policies.

Loss of Existing Housing

- 7.26 There are fourteen existing dwellings within the site boundary associated with the existing commercial tenancies for which there is an existing relocation strategy in place. All are located above the existing ground floor commercial units. The demolition of these residential properties will enable the comprehensive redevelopment of the site which would not be possible if they remained. The existing apartments will be replaced with higher quality, more energy efficient and higher density residential and mixed use development. The Proposed Development will therefore make more effective and efficient use of the site by optimising the housing output, in accordance with the NPPF and London Plan Policy 3.4 and in assisting the contribution of delivering new housing in accordance with the policies outlined above.

Housing Mix

- 7.27 The NPPF requires local planning authorities to deliver a wide choice of high quality homes and to plan for a mix of housing in terms of size, type, tenure and range based on local demand (Para 50).
- 7.28 London Plan Policy 3.8 states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New developments are required to offer a range of housing choices in terms of the mix of housing sizes and types.

- 7.29 London Plan 3.9 also sets a clear priority to create communities that are mixed and balanced by way of tenure, fostering social diversity, responsibility and identity.
- 7.30 Saved UDP Policy H4 states that wherever practicable a mix of housing units of different sizes should be provided in schemes of residential development. The policy also states that within town centres, predominantly one and two bedroom developments will be preferable, although the council will encourage dwellings suitable for large families, where the needs of the area suggest it is appropriate.
- 7.31 LBH Local Plan Part 1 Policy H2 expects all housing developments to include a range of housing, and will seek to maximise the delivery of affordable housing from all sites over the Local Plan period. The policy also seeks to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units. Similarly, policy 3.3 of the London Plan seeks to maximise affordable housing provision over the plan period.
- 7.32 Draft Local Plan Part 2 Policy DMH2 also supports the provision of a mix of housing units of different sizes in schemes of residential development and that this should to reflect the Council's latest information on housing need.
- 7.33 The key policy principles associated with housing mix applicable to the proposed development are as follows:
- The mix should contribute to the creation of mixed and balanced communities (within the site itself and the wider area) via the provision of a range of types, sizes and tenures;
 - The mix should aim to deliver against assessed housing requirements (borough and London-wide) in terms of unit size, affordability, and the needs of specific groups of occupiers;
 - It should assist in providing a wide choice of housing (i.e. broaden choice);
 - Affordable housing should be maximised, subject to viability and the need to encourage development to come forward, rather than being a constraint;
 - A London Plan target tenure mix of 60% social/affordable rent and 40% intermediate tenures, comparable with 70% social/affordable rent and 30% intermediate. (Tenures defined below)
- 7.34 The policy requirements identified above should also be considered in the context of market demand and viability/deliverability. It is important that market demand is considered alongside identified need on the basis that delivery and take-up is dependent upon the market.

Proposed Housing Types

- 7.35 The site's location within the town centre places it in an urban context. The opportunity has been taken to provide a mix of housing types within the proposed development, with 93 flats proposed within the detailed element to the north of the site, and up to 34 townhouses proposed within the outline element to the south.
- 7.36 In terms of housing types this represents a split of 73% flats and 27% houses. Given the constraints of the site (detailed within the DAS), the design of the proposed development has maximised the ability to provide a mix of house types.
- 7.37 The Development Schedule sets out the proposed mix of housing types for each block submitted for approval which is summarised in Table 6.1 below.

Table 6.1 Proposed Housing Mix

Component	Unit (Size/Tenure)	Number of Units	Percentage
Detailed	1-bed flat	32	25
Detailed	2-bed flat	56	44
Detailed	3-bed flat	5	4
Outline	3 or 4-bed house	34	27
Total (Detail/Outline)	All	127	100

Proposed Dwelling Sizes

- 7.38 The proposed mix of dwellings sizes (number of bedrooms) across the site is set out within the development schedule, and summarised in Table 6.1 above. In accordance with London Plan Policy 3.8 and LBH saved UDP Policy H4 and Local Plan Part 1 Policy H2 a range of dwelling sizes is proposed including 1, 2, 3 and 4 beds.
- 7.39 Delivering a significant proportion of family accommodation is a core objective of the proposed development. It is noted that the development will deliver up to 39 x 3-bed/4-bed units across the detailed and outline components which comprises 31% of the of the dwelling size mix across the scheme. The majority of this (up to 34 houses) is proposed to come forward as part of the outline component. However, five 3-bed flats will be delivered within the detailed component.
- 7.40 In addition to these units an additional 17 x 2-bed/4-person units are proposed which are capable of accommodating families. This means that the total percentage of family-sized accommodation to 56 units (44%), demonstrating that the proposed development makes a significant contribution to delivering on the need for family sized accommodation.
- 7.41 The proposed development also seeks to provide a mix of smaller 2-bed/3 person and 1-bed/2 person units. No studio units are proposed as there is not identified market demand.

The site's location within a district centre is supported by the draft Local Plan Part 2 as an appropriate location for smaller units. It recognises that a significant proportion of the need for 1 and 2 would be best met within the borough's centres. It also recognises that these units are most likely to be provided in the form of flats above shops as they will be well suited to those who wish to live in close proximity to town centre uses, employment opportunities and to public transport.

- 7.42 The proposed mix of unit types and sizes will increase housing supply and improve housing choice in this part of the borough and is considered suitable for a district centre location. On this basis, the proposed housing mix is considered to be in full accordance with the requirements of London Plan Policies 3.8 and 3.9, saved UDP Policy H4, Local Plan Part 1 Policy H2 and the emerging Policy DMH2 of the draft Local Plan Part 2.

Viability and Affordable Housing

- 7.43 The applicant's proposed approach to affordable housing is set out in the Affordable Housing and Viability Statement. The proportion of affordable housing proposed is the maximum that the proposed development can absorb without becoming unviable (which is supported by the outcome of a viability assessment which is to be submitted separately to the LBH), and therefore, is in accordance with the requirements of London Plan Policies 3.12 and 3.13 and LBH Local Plan Part 1 Policy H2.

- 7.44 Policy confirms the following tenure definitions:

- Social Rent: Owned by Local Authorities or Registered Providers and provided at target rents determined by the national rent regime;
- Affordable Rent: Owned by Local Authorities or Registered Providers and subject to rent controls that require a rent of no more than 80% of the local market rent; and
- Intermediate: Homes to rent or buy at a cost above social rent but below market levels. Includes shared equity (shared ownership or equity loans), low cost homes for sale, and intermediate rent.

- 7.45 At this stage it is proposed that 64% of the affordable units would be affordable rent and 34% intermediate tenures in order to comply as far possible with the London Plan and LBH Policies on tenure mix. The final amount and mix of affordable housing will be determined in due course following completion of the viability appraisal during the determination period.

- 7.46 The viability assessment will determine the amount of value (subsidy) that the scheme is able to attribute to affordable housing provision. The most appropriate amount/mix of affordable provision will then be determined within this defined subsidy parameter. A critical

consideration in determining the most appropriate affordable mix is ensuring that affordable housing units are capable of genuinely affordable. This is considered below.

Intermediate

- 7.47 The Mayor sets eligibility criteria (defined by household income) to qualify for intermediate housing in London. These incomes are capped at £64,300 (for up to 2-bed homes) and £74,200 (for 3-bed and above). The combined costs of rent and mortgage payments mean that family sized shared ownership homes in this location are unlikely to be capable of being afforded by households with incomes below £74,200. Therefore, we consider that the intermediate tenure units would be best suited to 1 or 2-bed units.

Affordable Rent

- 7.48 In order to be genuinely affordable the rental value of units must be set at a rate that is affordable by eligible households. This is a challenge in much of London under the affordable rent regime which allows rents at up to 80% of market value to be charged. Whilst a greater per unit subsidy could be applied, this would reduce the number of affordable units that the scheme is able to support (noting that the value of affordable housing subsidy that the scheme can support will be fixed by the viability assessment).
- 7.49 The key is to secure an appropriate balance between the policy objectives of maximising the provision of affordable housing, meeting the policy priority for family sized affordable homes, and ensuring viability.

Housing Density

- 7.50 In relation to delivering new housing, the NPPF advises that local authorities should set out their own approach to housing density to reflect local circumstances (Para 47). It also outlines that planning policies and decisions should aim to ensure that developments optimise the potential of sites to accommodate development (Para 58).
- 7.51 Density guidance for new residential developments are set out in the London Plan, and relate to the accessibility of sites (Table 3.2 Sustainable residential quality (SRQ) density matrix (London Plan, 2015). Policy 3.4 states that development should optimise housing output for different types of locations within the relevant density range shown in Table 3.2.
- 7.52 The site has a PTAL rating which ranges between 2 and 3. In accordance with notes associated with table 3.2 in the London Plan, the site is located within an 'Urban' setting ("areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of

two to four storeys, located within 800 metres walking distance of a district centre or, along main arterial routes”).

- 7.53 The London Plan Housing SPG (2012) sets out further guidance on how to calculate appropriate housing densities for mixed use schemes. The guidance advises that when calculating density in vertically-mixed schemes (i.e. where housing is on top of non-residential uses), the size of the site should be reduced by an amount that is equivalent to the proportion of total floorspace allocated to non-residential uses (both below and above ground, measured as GIA) before calculating residential density in the normal way.
- 7.54 London Plan Table 3.2 states that for sites in an ‘Urban’ setting with a PTAL between 2 and 3, the appropriate density range is between 45 and 170 units per hectare. Therefore, the site, with a proposed density of 129 u/ha sits comfortably within the desired residential density and is policy compliant.
- 7.55 It should be noted that whilst the PTAL measure might indicate an average level of accessibility across the site, PTAL is a quantitative, crude measure. Access to public transport is only one aspect of accessibility, and residents will have good access to local shops, schools and other facilities all within walking distance.
- 7.56 As noted previously and demonstrated by the DAS, the residential densities are the product of a comprehensive design evaluation process which has sought to establish the most appropriate design solution for the site. This design-led approach is advocated by the London Plan (para 3.28), which states that determining density should have regard to local context and character, the principles of good urban design, access to and the capacity of public transport and social infrastructure.

Housing Quality

- 7.57 Planning policy at all levels places great importance on the need for new homes that are of high quality design, and identifies the role that this plays in creating successful communities. The London Plan is clear that the policy support for increasing housing supply should be delivered whilst securing appropriate housing quality.
- 7.58 The development plan includes a raft of development management policies relating to housing specification, including Lifetime Homes, Wheelchair Units, minimum floorspace standards and outdoor amenity space. Alongside local policy, the Mayors Housing SPG is of particular relevance.
- 7.59 The proposed development will create a high quality environment for future residents of the site both externally in the street environment and surrounding landscaping, as well as within

the proposed new homes. As explained in the accompanying DAS, there are a number of key attributes of the proposed development that help to achieve this:

- Including a balance of homes across the site, including a high proportion of family sized homes;
- Creating public streets and spaces that are active and overlooked to ensure safe places to live;
- Proposing a large proportion of houses and apartments at ground floor and other units that provide front doors directly on to streets and public spaces;
- Maximising the number of dual aspect homes and avoid single aspect north facing homes;
- Maximising the amount of active frontage and avoiding lengths of inactive frontage to streets and public spaces; and
- Providing high quality communal and amenity spaces for all homes.

7.60 As demonstrated by the DAS, the design of the proposed development provides the highest residential quality by meeting policy requirements and exceeding the baseline standards contained within the London Plan Housing Design SPG and adhering to a number of the good practise principles. The majority of homes proposed in the detailed component are designed to Lifetime Homes Standards (89 of 93 units) and 96% of the units across the site are capable of being adaptable to wheelchair accessible standards which far exceeds the required 10%.

7.61 For the reasons set out above, the proposed development represents the highest residential quality and is in accordance with London Plan and LBH Policies.

Summary

7.62 The proposed development will result in and contribute towards being part of a mixed and balanced community providing a comprehensive mix of dwelling types, sizes and tenures, including a significant proportion of family housing. The proposed development makes an efficient and effective use of the site by developing at an appropriate density that responds to the local character and public transport accessibility.

7.63 The proposed development has been designed to the highest standards which will result in the creation of a place within the centre of Northwood where people will enjoy living, while delivering on the critical housing needs of the borough and greater London.

7.64 For the reasons set out above, the proposed development is wholly in accordance with the requirements of national, regional and local policy.

Retail Uses

Loss of Existing Retail

- 7.65 There are currently 17 existing retail units on the site comprising xx sq. m.

Proposed Quantum and Uses

- 7.66 The NPPF recognises that town centres are often at the heart of communities and LPAs should pursue policies to support their vitality and viability. It requires local plans to identify a network of centres and allocate sites to meet objectively assessed needs in full.
- 7.67 Similarly, London Plan Policy 2.15 promotes town centre development that enhances the vitality and viability of a centre. The policy seeks to ensure that development in town centres accommodates economic and housing growth in appropriate locations. London Plan Policy 4.7 seeks to ensure that the retail proposals accord with the town centre hierarchy and relate to the size, role and function of a town centre and its catchment.
- 7.68 Local Plan Part 1 Policy E5 states that the Council will accommodate additional retail growth in established centres. The policy also seeks to direct growth of comparison retail to the borough's district centres.
- 7.69 A health check survey of Northwood district centre was undertaken on 20th October 2015 in order to gain an up-to-date understanding of the centre's vitality, viability and current performance. This confirmed that the centre is 'healthy' and therefore resilient to change. The London Plan (2015) defines a district centre as 'providing convenience goods and services for local communities. Typically they contain 10,000 – 50,000 sq.m of retail, leisure and service floorspace'. Northwood currently comprises approximately 11,900 sq.m of floorspace, indicating that it is a relatively small district centre in classification terms. However, Northwood district centre benefits from a reasonably diverse retail composition and low vacancy rate, although, as the Goad plan attached at Appendix 1 illustrates, many the units are relatively small in size. Furthermore, the units currently present within the application site are particularly small.
- 7.70 In accordance with the policies mentioned above, the application proposes 1,440 sq.m GIA floorspace. The proposed floorspace is located within the detailed component to the north of the site fronting Green Lane and around the new public piazza.
- 7.71 The proposed plans (document ref. N-08) show the extent of the retail floorspace (1,440 sq. m). Whilst these areas will be fixed by the primary control documents, the application does not seek to define the configuration and use of the floorspace (i.e. to subdivide the space).

The largest area of floorspace shown is 660 sq. m. However, it is envisaged that this will be subdivided in order to meet prospective tenant requirements when these are known. Therefore, in order to provide flexibility to respond to the market, flexible class A1/A2/A3/A4/A5 use is sought across the proposed floorspace.

- 7.72 This new floorspace will play a key role in enhancing and solidifying Northwood's role as a district centre in accordance with strategic and local policies. The new commercial floorspace proposed will provide larger, modern floor plates which may be more attractive to a wider range of retail and service operators.

Sequential and Impact Policy Matters

- 7.73 The site is located within the district centre boundary, and more specifically within the secondary frontage. In policy terms this is an edge-of-centre location for retail uses and in-centre location for other town centre uses. We consider there to be no sequentially preferable locations (i.e. in-centre) to meet the development need on the following grounds:

- This is a location specific need. The inclusion of retail (and other than town centre uses) is necessary to support the deliverability of the proposed transport infrastructure and other community objectives (i.e. the mixed use development). This need is not capable of being satisfied anywhere else; and
- There are no sites available for redevelopment in the primary shopping frontage (in the context of the very low shop unit vacancy rate).

- 7.74 On the above basis, we consider the sequential test is satisfied.

- 7.75 The proposed development involves a small increase in retail floorspace which falls under the 2,500 sq. m threshold set out in the NPPF where a retail impact assessment would be required. There is no adopted local threshold. The proposed development also falls under the proposed local threshold set out in draft Local Plan Part 2 Policy DMTC2. Therefore, the impact policy test is satisfied.

Open Space

Public Open Space

- 7.76 The NPPF (paragraph 74) requires green infrastructure to be created within developments where possible. The London Plan seeks enhancements to London's green infrastructure.
- 7.77 The London Plan promotes the provision of new green infrastructure which is integrated into the wider network and which links green infrastructure to improve accessibility.
- 7.78 At the local level, and as identified within both LBH Open Space Strategy 2011-2026 (2011) and GVA's Local Open Space Audit attached at Appendix 4, Northwood District Centre meets the quantity standard for all open space types, with provision in Northwood and Northwood Hills exceeding 6.0 ha of unrestricted open space per 1000 population. Therefore, the application site is not within an area of deficiency for public open space. The needs generated by the future population of the Proposed Development must however be met appropriately.
- 7.79 The amount, type and location of open space proposed by the planning application is set and controlled by the detailed landscape drawings and Parameter Plans. The strategy and justification for the provision is explained within the DAS. The proposals comprise a minimum of 1,457 sq. m of Public Open Space across the site, within the detailed components of the Application through the following:
- Public green space (354 sq. m); and
 - Piazza (768 sq. m).
- 7.80 Unrestricted public access to the green space and piazza will be available at all times. The proposed amount, type and location of Public Open Space is considered to be in full accordance with the policy requirements and objectives of the London Plan and Local Planning Policy.

Children's Playspace

- 7.81 Policy 3.6 of the London Plan requires proposed developments that include housing to make provision for play and informal recreation based on the expected child population generated by the scheme and an assessment of future needs. It refers to the London Plan Play and Informal Recreation SPG for further guidance (please see Appendix 4 for further details).
- 7.82 In accordance with the London Plan Play and Informal Recreation SPG (2012), the proposed development will generate an estimated 54 children across all age groups. This figure is based

on the maximum number of residential units being delivered across the proposed development (i.e. 93 units in the detailed component and up to an additional 34 in the outline component).

- 7.83 Given the constraints of the site, it is proposed that appropriate play space will be provided on site for children between 0-5 years. Older children will have access to the existing play facilities available in the surrounding area, and therefore, no on-site provision is considered necessary for these age groups. It should be noted that all dwellings will have access to their own private amenity space in addition.
- 7.84 The proposed development will generate a yield of approximately 31 children across the ages of 0-5 year olds which results in a requirement for 310 sq. m of children's play space. An area 354 sq. m flexible space will be provided for informal play activities. This space will include interactive pieces of play equipment in the form of naturalistic elements and allow children to explore the landscape and explore the spaces. Therefore, the proposed development will provide adequate provision of children's playspace in accordance with mayor's policy requirements.

Design and Heritage

Heritage

- 7.85 The NPPF sets out the government's guidance on conserving and enhancing the historic environment. It encourages LPAs to set out a positive strategy for the conservation and enjoyment of the historic environment within their Local Plans (Para 126). In determining planning applications, LPAs will require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting. Importantly, 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 (Para 128). A Heritage Appraisal prepared by Portico Heritage accompanies the application. It sets out the heritage context of the site and identifies the heritage assets associated with the site.
- 7.86 Para 132 states that when considering the impact of the proposed development on the significance of a designated heritage asset, great weight should be given to the assets' conservation. As previously identified, the site falls within a conservation area, but there are no statutory or locally listed buildings. However, the former bank building at the corner of Station Approach and Green Lane (currently occupied by Coral) is recognised as currently making a positive contribution to the Green Lane Conservation Area and its loss would be of harm (in heritage terms).
- 7.87 In this context, it is important to recognise that good design will ensure attractive, useable, durable and adaptable places and is a key element in achieving sustainable development (Para 133). Para 133 also states where a proposed development will lead to substantial harm or total loss of significance of a designated heritage asset, LPA should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 7.88 LPAs are encouraged by the NPPF to look for opportunities for new development within conservation areas (Para 137). National policy guidance is reflected in Local Plan Part 1 Policy SO1 which sets a strategic objective to conserve and enhance the conservation area.
- 7.89 The Heritage Appraisal recognises that some of the existing buildings within the conservation area as a whole, specifically the former Bank building, are of quality. However, this quality has been eroded through the replacement of shopfronts and details alongside less successful development throughout the conservation area. As such, there is an opportunity to enhance the conservation area through a carefully considered scheme at the site. This is considered further in the section below and within the accompanying Heritage Appraisal and Design and Access Statement.

Urban Design

- 7.90 The proposed design has been the product of an extensive analysis of the site and its surroundings undertaken by the design team to understand fully the context for the proposed development. A thorough assessment of the physical constraints and opportunities presented by the site and its surroundings has been undertaken. The accompanying DAS explains in more detail how the proposed development has been developed in response to the identified context, and described in full detail how the proposals have taken shape in the context of a series of identified key principles.
- 7.91 The NPPF outlines a number of core planning principles which includes the requirement to always seek to secure a high quality design and a good standard of amenity for all existing and future occupants of land and buildings (Para 17).
- 7.92 Good design is identified in the NPPF as a key aspect of sustainable development, indivisible from good planning, and should contribute positively to making places better for people (Para 56).
- 7.93 In determining applications, LPAs are also encouraged to give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area (Para 63). Permission should be refused for development of poor design that fails to take account of opportunities available for improving the character and quality of an area and the way it functions (Para 64).
- 7.94 Policy 7.1 of the London Plan states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.2 further states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments achieve London Plan Policy 7.2 have been addressed throughout the evolution of the development proposals for the Site.
- 7.95 Policy 7.4 of the London Plan goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings. The policy further states that buildings should provide contemporary architectural responses that:
- Have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
 - Contribute to a positive relationship between the urban structure and local natural landscape features;

- Are human in scale;
- Allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
- Are informed by the surrounding historic environment.

7.96 Local Plan Part 1 Policy BE1 further reflects the NPPF and London Plan objectives. It 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. New development must achieve a high quality of design, and should be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area.

7.97 The DAS demonstrates that the design of the proposed development has evolved in response to the site's context and on the basis of a series of underlying principles/objectives and pre-application consultation. Specifically, this includes the positive contribution that the scheme will provide through the activation of Central Way through the inclusion of retail frontages, a facilities management suite, an entrance to the residential core and a green wall.

7.98 As discussed more fully in the DAS, the proposed development provides the framework through which a high quality new place can be delivered. It will enhance the appearance of, and make best use of the site, whilst also successfully knitting into surrounding areas and creating a new focal point for the centre of Northwood and its conservation area.

7.99 The DAS (alongside the SCI and Section 5 of this statement) also demonstrates how the proposed development has evolved through extensive consultation with the determining authorities, stakeholders, and the local community.

7.100 The proposed development is a result of an extensive design process and is considered to be in compliance with the design principles set out in national, regional and local policy guidance.

Environmental and Technical

Acoustic and Vibration

- 7.101 London Plan Policy 7.15 states that development proposals should seek to avoid significant adverse noise impacts on health and quality of life, and mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development. The policy also states that proposals should improve and enhance the acoustic environment and promote appropriate soundscapes.
- 7.102 LBH Noise SPD (2006) considers both noise sensitive development (such as housing) and noise-generating development. The SPD sets out detailed guidance for the control of noise as part of new development in Hillingdon, and is the main reference point for the Acoustic Planning Report submitted alongside the application.
- 7.103 An Acoustic Assessment prepared by Buro Happold (BH) has assessed the potential noise impacts from the proposed development, and demonstrates how the proposal will comply with all relevant noise and vibration standards and requirements.
- 7.104 The table below provides a summary of the noise and vibration impact of the proposed development in respect to existing receptors (i.e. existing residents) and introduced receptors (i.e. new residents), as well as any mitigation measures which should be adopted:

Description	Nature of Impact	Geographical Scale	Comments
Ambient Noise and Vibration Environment and Suitability of Site for Proposed Uses			
Ambient Noise	Noise from Northwood Station and local roads (Green Lane) may impact upon the new residential and commercial development	Local	Following the use of sound insulation (as detailed in the full report) and orientation of noise sensitive rooms, the site is considered suitable for its intended use
Ambient Vibration	Vibration from Northwood Station railway movements	Local	A vibration survey adjacent to the Northwood railway station has been carried out and the levels measured show that there will be a "Low probability of adverse comment" as per BS 6472.
Operational Impacts			
Noise and	Any new fixed plant	Local	Using low noise plant

Vibration from Building Services Plant	introduced at the Proposed Development will need to be, if necessary, mitigated to meet LBH's noise limits at noise sensitive receptors		items and/or suitable noise mitigation it is likely that the noise emissions will meet criteria. No sources of vibration associated with the Proposed Development have been identified.
Road Traffic Impacts			
Road Traffic Noise	Increases in road traffic on surrounding roads of the development may have a negative impact while a decrease in road traffic will have a positive impact.	Local	The increase in road traffic noise of the local roads adjacent to the Proposed Development are predicted to have a Negligible impact
Construction Impacts			
Construction Noise	Construction Noise	Local	Adhering to hours of works and the guidance in BS 5228 Part 1 and LBH SPD, it is likely there will be a negligible to minor impact to the surrounding environment
Construction Vibration	Construction Vibration	Local	Adhering to hours of works and the guidance in BS 5228 Part 2 and LBH SPD, it is anticipated that there will be a negligible impact due to vibration on the surrounding environment.

7.105 Accordingly, we conclude that the existing and future noise environment is appropriate for the proposed uses and that the proposed development will not have a significant impact on the existing noise environment for existing use and therefore occupiers.

Air Quality

7.106 London Plan Policy 7.14 promotes sustainable design and construction to reduce emissions from the demolition and construction of buildings, and states how developments should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality. Similarly, Local Plan Part 1 Policies SO11 and EM1 also seek to reduce a development's impact on local air quality by incorporating low carbon strategies.

- 7.107 An Air Quality Assessment prepared by BH for the proposed development. A three month monitoring survey was undertaken at four locations near the proposed development as agreed with LBH. The results demonstrate that air quality objectives are being met at all locations except one located on Green Lane, however, it is intended to continue monitoring for a further three month period in order to provide robust monitoring results on which to base annualised data.
- 7.108 In addition to monitoring, modelling of the potential impact of the development once fully operational has also been assessed.
- 7.109 The impact from emissions due to proposed on-site plant has been considered at onsite and offsite residential receptors. The results show that the impact on air quality as a result of plant emissions will be negligible at all locations tested. In addition, all on-site gas boilers will meet the GLA's emission limit.
- 7.110 The impact of traffic emissions on proposed residential receptors has been considered at proposed residential properties. The assessment considers that pollutant concentrations at all proposed residential receptors will meet the relevant air quality objectives.
- 7.111 During the construction and demolition phases of the development, it has been recommended that mitigation measures are implemented to ensure that any impact on local air quality remains negligible.
- 7.112 The assessment considers that the proposed development will meet air quality neutral benchmarks for both transport and buildings emissions as set by the London Plan Policy 7.14. For further details please refer to the accompanying document.

Arboriculture

Arboricultural Survey

- 7.113 An Arboricultural Survey prepared by Thomson Ecology has identified that there are 70 trees within and immediately adjacent to the site. Trees were given a category rating of A, B or C in descending order of value and assigned one or more subcategories qualifying the basis of that value as either arboriculture, landscape or cultural. Trees with only short-term remaining value or that require immediate removal for safety or management reasons are given a U category rating.
- 7.114 A total of 22 individual trees and 13 groups were recorded of which there was one Category A tree, one Category B tree, four Category B groups, 19 Category C trees, nine Category C groups and one Category U group. The survey advises that strong effort should be made to retain Category A and B trees within the proposed development. The report also states that

whilst Category C trees should be retained where possible, they should not be retained where they would present a serious constraint to development. Please refer to the full document submitted with the application for details.

Arboricultural Impact Assessment and Method Statement

- 7.115 An Arboricultural Impact Assessment and Arboricultural Method Statement have been prepared by Thomson Ecology to consider the impacts of the proposed development on trees and to provide recommendations and mitigation measures as necessary.
- 7.116 The Arboricultural Impact Assessment concludes that the proposed development will result in the loss of 14 trees and six groups of trees from the site. However, all of the individual trees and four of the groups of trees are Category C and Category U. These losses will also be offset with new tree planting which will ultimately increase the arboricultural value of the site.
- 7.117 The Arboricultural Method Statement details how existing hard standing will provide an adequate level of protection for trees that are to be retained during the proposed works. Please refer to the supporting document for full details. These details should be read in conjunction with the proposed landscaping strategy which sets out the provision of planting mitigation.

Daylight/Sunlight

- 7.118 Saved UDP Policies BE21 states how planning permission will be granted for new buildings or extensions which by reason of their siting, bulk and proximity, where they will not result in a significant loss of residential amenity. Draft Local Plan Part 2 Policy DMHB17 also states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.
- 7.119 The Daylight and Sunlight Assessment prepared by Buro Happold evaluates the daylight and sunlight availability within and surrounding the proposed development. In respect of findings of the assessment conclude that surrounding:
- Buildings will receive adequate daylight once the proposed development is complete.
 - Buildings will receive adequate, direct sunlight once the proposed development is complete.
 - Open spaces will receive adequate direct sunlight once the proposed development is complete.
- 7.120 The assessment also confirms that:

- The proposed development receives adequate daylight access at all but six residential window locations, but adequate daylight and sunlight access could be achieved by careful consideration of room layouts and window arrangements.
- Through detailed design of the room layouts, room uses and window sizes the townhouses can maximise the daylight potential of the proposed development.
- The proposed development receives adequate direct sunlight at all but six windows, all of which meet either the BR209 recommended APSH or WPSH.
- The proposed development generally receives adequate direct sunlight, considering its urban setting.
- The proposed piazza will receive adequate direct sunlight.

7.121 For further details, please refer to the full report attached to this application.

Ecology

7.122 A Preliminary Ecological Appraisal prepared by Thomson Ecology evaluates the ecological value of the site. A desk-based study and extended Phase 1 habitat survey were undertaken to gather baseline ecological data for the site and surrounding area.

7.123 The main findings of the desk study were that Northwood Railway Cutting Site of Importance for Nature Conservation (SINC) overlaps the north-west boundary of the site. The application site is also within 2km of Ruislip Woods Site of Special Scientific Interest and National Nature Reserve. Areas of ancient woodland, lowland mixed deciduous woodland and traditional orchard are located within 2km of the site.

7.124 The appraisal concludes that the proposed development will not have a significant effect on the statutory and non-statutory nature conservation sites identified in the desk study. Northwood Railway Cutting SINC should not be impacted, however, there is potential for Broadleaved woodland to be impacted which is suitable habitat for invertebrates, breeding birds and mammals.

7.125 The following mitigation measures were recommended to ensure the development complies with the relevant biodiversity legislation and policy:

- Replacing any scattered broadleaved trees removed during the proposed development with new trees;
- Necessary clearance of trees and shrubs to be undertaken outside of the breeding bird season or following a check for nesting birds by an ecologist if this is not possible;
- Using native trees, shrubs and wild flowers in the landscape design for the redeveloped site;

- Incorporation of ecological enhancements such as bat and bird boxes on mature trees and new buildings, incorporation of log piles to create invertebrate habitat, and water features for breeding birds;
- Incorporation of transition habitats and small gaps for the passage of hedgehogs could be incorporated into the landscape design; and
- Green walls and green roofs could be incorporated into the building designs.

7.126 Subject to the above recommendations being adopted within the proposal, it is concluded that the development will not cause any significant ecological impact. Full details are set out within the accompanying Appraisal.

Flood Risk

7.127 London Plan Policy 5.12 seeks to minimise flood risk issues in a sustainable way. Local Plan Part 1 Policy EM1 requires development to be located and designed in a way that minimises the probability and impacts of flooding. Similarly, Local Plan Part 1 Policy EM6 states that development will be directed towards sites in Flood Zone 1. The Council will also require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.

7.128 A Flood Risk Assessment (FRA) prepared by BH was undertaken as the site is greater than 1 ha. The proposed development is within Flood Zone 1, which has a low risk of flooding. As a result, the proposed land uses are considered appropriate.

7.129 The assessment concludes that the risk of surface water flooding will not increase as a result of the development both on and off site for events up to and including a 1 in 100 year event (with an allowance for climate change). Furthermore, the risk of flooding from sewers is expected to decrease due to the reduction in demand on the combined sewer system by collecting the surface water runoff on the site in storage tanks. The site is also not expected to be at risk of flooding from groundwater or artificial sources. The proposed development is therefore considered to be compliant with planning policy in terms of flood risk. Full details are set out within the accompanying FRA.

Geoenvironmental and Geotechnical

7.130 Geoenvironmental and Geotechnical Desk Study prepared by BH has assessed the potential ground related risks associated with the comprehensive redevelopment of the site.

7.131 The desk-based study identified potential risks relating to potential contamination (including gas/vapour) and potential impact upon future site occupants, users, construction workers and site neighbours. Potential risks to controlled waters from migration of contaminants via

permeable strata or preferential pathways created during construction of the development, as well as drainage and surface run-off to the neighbouring tertiary river. Other potential risks identified included the possible presence of Unexploded Ordnance. However, all of the potential risks identified were concluded as being capable of being mitigated.

7.132 The study concludes that the ground conditions on site are not anticipated to be particularly problematic. The scheme is likely to involve the construction of both shallow and deep piled foundations, basements and foundations on or close to existing slopes, as well as construction close to existing LUL assets including running track and bridges. The study also concludes that slope stability and groundwater will be important considerations both for temporary and permanent works.

Energy and Sustainability

7.133 Paragraphs 93 to 97 of the NPPF underpin the Government's priority in delivering sustainable development. In line with the NPPF, development proposals are expected to comply with local requirements and should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and to increase the use and supply of renewable and low carbon energy.

7.134 London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide (CO₂) emissions in accordance with the following energy hierarchy:

- Be Lean: use less energy;
- Be Clean: supply energy efficiency; and
- Be Green: use renewable energy.

7.135 At a local level, Local Plan Part 1 Policy EM1 seeks to ensure that climate change mitigation is addressed at every stage of the development process. Some of the measures include:

- Prioritising higher density development in urban and town centres that are well served by sustainable forms of transport;
- Encouraging the installation of renewable energy for all new development; and
- Promoting a modal shift away from private car use.

7.136 A Sustainability and Energy Statement has been prepared to predict the energy consumption and CO₂ production of the Proposed Development, and outline the measures being taken to maximise sustainable energy production. The Proposed Development includes the following sustainable design attributes:

- The development will achieve the required 35% reduction in Co2 emissions over Part L 2013 as required by London Plan policy through a fabric, CHP and photovoltaic panels.
- All residential units will be constructed with Code for Sustainable Homes (CSH) Level 4 in terms of energy and water. A full CSH assessment is not required for the development as the scheme is being discontinued. This was confirmed in correspondence with Hillingdon Council;
- All fully-fitted out, non-residential floorspace is to be constructed to BREEAM Very Good Standard. Non-residential floorspace which is not to be fully fitted out by TfL will be designed so as not to prejudice the BREEAM Very Good Standard;
- Buildings will be specified with high energy efficiency building fabric and services measures meeting Building Regulations 2013 standards as minimum without the aid of CHP.
- The Mayor of London's Priority Standards as set out in the Sustainable Design and Construction SPG (2014) will be met; and

For the reasons set out above (and detailed in the accompanying documents), it is considered that the Proposed Development incorporates suitable measures within its design to adequately meet energy and sustainability requirements in accordance with national, regional and local planning policy.

Summary

- 7.137 As demonstrated by the suite of environmental and technical reports prepared by BH, there are no environmental or technical constraints that would prevent the proposed development for coming forward.

Transport and Accessibility

- 7.138 Paragraph 30 of the NPPF encourages design solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraphs 32 and 36 also state that all development that generates significant amounts of movement should be supported by a Transport Assessment and Travel Plan. Similarly, paragraph 34 seeks to guide development that generates significant amounts of movement to a location where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 7.139 London Plan Policy 6.1 reflects the NPPF's strategic approach to transport by encouraging patterns and nodes of development that reduce the need to travel and improve the capacity and accessibility of public transport, walking and cycling. The policy also states that relevant development should improve the interchange between forms of transport, particularly around major rail and Underground stations.
- 7.140 London Plan Policy 6.3 requires development proposals to assess the impacts on transport capacity and the transport network at both a corridor and local level. Policy 6.9 requires developments to provide secure, integrated and convenience and accessible cycle parking facilities, and Policy 6.13 requires proposals to adhere to the maximum car parking standards set out in the London Plan's Parking Addendum (Table 6.2). Furthermore, developments must:
- Ensure that 1 in 5 spaces provide an electrical charging point (20% + 20%);
 - Provide parking for disabled people;
 - Meet the minimum cycle parking standards set out in Table 6.3; and
 - Provide for the needs of businesses for delivery and servicing.
- 7.141 London Plan Table 6.2 'Parking for residential development' states that development within a PTAL of 2-4 in an 'urban' and 'suburban' setting should provide up to 1.5 spaces per unit. The maximum residential parking standards are as follows:
- 1-2 Bed: less than 1 per unit
 - 3 Bed: up to 1.5 per unit
 - 4 or more: up to 2 per unit
- 7.142 At a local level, Local Plan Part 1 Policy T1 seeks to steer development to the most appropriate locations in order to reduce their impact on the transport network. Saved UDP Policy AM2 states that proposals will be assessed against the present and potential availability of public transport and its capacity to meet increased demand.

- 7.143 The Saved UDP Policies document contains interim parking standards in Appendix 1. For residential (C3) uses, the local parking standard is 1.5 spaces per dwelling for flats with communal parking, and 2 spaces per dwelling for housing with curtilage parking. Draft Local Plan Part 2 Parking Standards are as follows:
- Studio: 1 space per 2 units
 - 1-2 Bed flat: 1-1.5 spaces per unit
 - 3+ Bed flat: 2 spaces per unit
 - Houses: 2 spaces per dwelling
 - A1 Non-food: 1 space per 50-60 sq.m (Gross)
- 7.144 The proposed number of car parking spaces averages at 0.95 spaces per dwelling. As agreed by LBH and GLA, we have proposed a scheme which falls between the London Plan and Local car parking standards which has been deemed acceptable.
- 7.145 A Transport Assessment has been submitted to accompany this application in accordance with paragraph 32 of the NPPF. In summary, the assessment concludes that the Proposed Development will not result in any material impact on existing traffic flows within and around the site, and outlines measures which will improve access and connections between various transport modes.
- 7.146 The results from the Transport Assessment indicate that for all time periods (i.e. AM, PM, School and Saturday peaks) that the proposed junction layout will mitigate the impacts of any additional traffic that is likely to be generated as a result of the proposed development. The proposed junction layout allows the network to operate notably better than if no development or junction improvements are delivered.
- 7.147 The Transport Assessment also identifies how the proposed development will foster a greater use of sustainable transport modes. The development will increase cycle parking spaces which will be located in convenient and secure areas. It has been designed to increase pedestrian permeability and usability of the site, thereby further encouraging walking and cycling. Furthermore, the improved accessibility and functionality between the Underground station, pedestrianised piazza, cycle parking and bus stops will encourage greater use of sustainable transport modes in accordance with national, strategic and local planning policies.

Community Aspirations

- 7.148 In recognition of the relevant planning policy requirements, the proposed development has been prepared within a framework of thorough, early and plentiful community and stakeholder consultation.
- 7.149 The overarching purpose of the applicant's strategy has been to identify community/stakeholder concerns at the earliest opportunity and to respond to these as part of the preparation of the planning proposals in order to achieve support for the scheme prior to the submission of a planning application. The approach taken (in terms of consultees, timing, and scope/style/extent of consultation events) was prepared at the outset of the planning strategy. The strategy involved regular meetings, workshops and correspondence with LPA officers and statutory bodies together with a bespoke programme of engagement with the local community.
- 7.150 Reference should be made to the Statement of Community Involvement (SCI) submitted in support of the application. This sets out details of how the applicant engaged with the local community and how their comments have helped shape the Proposed Development. The SCI also provides a comprehensive overview of consultation events and the stakeholders that the Applicant has engaged with in the process of preparing the application. It demonstrates the far-reaching and rigorous approach that the applicant has taken to stakeholder consultation.

8. Planning Obligations

Community Infrastructure Levy

- 8.1 The Applicant will be required to provide planning contributions in the form of the LBH and Mayoral Community Infrastructure Levy (CIL).
- 8.2 The Council's adopted CIL charging schedule provides for the infrastructure impacts associated with the proposed development and the scheme will contribute in accordance with the LBH levy as well as the Mayor's CIL.

Section 106 Heads of Terms

- 8.3 It is recognised that there is a need to provide a Section 106 agreement to cover Employment and Construction Training which has been identified as priority for the LPA which falls outside of CIL.
- 8.4 The level of affordable housing contribution will be determined following discussions with the LPA during the determination period.

9. Conclusions

- 9.1 This Planning Statement has been prepared in support of the Hybrid Planning Application being made for the site.
- 9.2 The applicant has undertaken significant engagement with the local community and stakeholders over a 14 month period leading up to submission. The feedback and support has shaped the proposed development which has also been the subject of pre-application consultation with the London Borough of Hillingdon and Greater London Authority.
- 9.3 In bringing forward TfL's aspirations, the proposed development will provide a significant contribution to transport accessibility in Northwood. The proposed new ticket hall will provide step-free access to Northwood LU station improving accessibility for all users. The improved interchange around the LU station will also improve the transport hub between underground trains, buses, vehicle users, pedestrians and cyclist.
- 9.4 The proposed development will also make a substantial contribution towards the recent increase in housing targets for the borough, helping to meet the critical need for housing identified by the Mayor, by providing an appropriate mix of house types, sizes and tenures.
- 9.5 In addition, the proposed development will be of public benefit providing a new piazza around which new retail uses and the station will be centred. This will positively contribute to the vitality and viability of Northwood. This has been brought forward through extensive consultation with the local community.
- 9.6 The proposed development, as set out throughout this Statement, is considered to be in accordance with planning policy and guidance at national, regional and local levels. When read as a whole, the proposed development accords with the development plan and the identification of the site at both the strategic and local levels as a significant opportunity to provide new homes, jobs and public benefits for Northwood, the LBH and London.
- 9.7 On this basis, LBH should there take the opportunity to apply the presumption in favour of sustainable development and grant planning permission for this application.



Appendices



Appendix I
Goad Plan
Survey and
Composition
of Northwood
District Centre



50 metres

Experian Goad Plan Created: 20/10/2015

Created By: GVA

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Northwood District Centre Composition

Use Class	Number of units	Percentage %
A1 (Shops)	45	50.00
A2 (Financial & Professional Services)	17	18.88
A3 (Cafes & Restaurants)	9	10.00
A4 (Drinking Establishments)	2	2.22
A5 (Hot Food Takeaways)	7	7.77
Other	8	8.88
Vacant	2	2.22
Total	90	100%

Current Occupiers of Application Site

Address	Current Occupier (20/10/15)	Use Class
59-61 Green Lane	Ladbrokes Betting Office	Sui Generis
63 Green Lane	Regal Kebab & Fish Bar	A5
65 Green Lane	Vacant	-
65-65A Green Lane	Lamertons Optician	A1
65C-65E Green Lane	Gibbs Gillespie	A2
1 Eastbury Road	Hard 8	A3
64 Green Lane	Taylor Made	A5
64B Green Lane	Electronics Store	A1
62 Green Lane	Post Office	A1
60 Green Lane	Steve's Hair	A1
58 Green Lane	David Lichfield Estate Agents	A2
54-56 Green Lane	Coral Betting Office	Sui Generis
7 Station Approach	Dental Surgery	D1
8 Station Approach	Express Dry Cleaners	A1
9 Station Approach	Senses Natural Therapy	Sui Generis
10 Station Approach	K.P.A Shoe Repair & Services	A1
11 Station Approach	Townsend's Estate Agent	A2
12 Station Approach	Ritz Beauty & Sparkle Nails	A1
13-16 Station Approach	Black Soda Bar	A4
17 Station Approach	Farmhouse Pizza	A5
1 Station Approach	Ace Cars Taxis	A1
2 Station Approach	Gentleman's Barbours	A1
-	Northwood London Underground Station	Sui Generis
-	Station Bookstall	A1
Coachworks	TfL	B2
Station Car Park	NCP	Sui Generis

Composition of Application Site

Use Class	Number of units	Percentage %
A1 (Shops)	10	38.46
A2 (Financial & Professional Services)	3	11.54
A3 (Cafes & Restaurants)	1	3.85
A4 (Drinking Establishments)	1	3.85
A5 (Hot Food Takeaways)	3	11.54
Other	7	26.92
Vacant	1	3.85
Total	26	100%



Appendix II
Northwood
Voice Letter
dated 7th
October 2015



Transport for London
Commercial Development
Directorate (Property)

5th Floor, West Wing
55 Broadway
London
SW1H 0BD
peterelliott@tfl.gov.uk

7th October 2015

Northwood's Voice

Northwood's Voice petition September 2015

Dear Northwood's Voice

I write following the recent TfL public consultation event, at which we exhibited our latest design proposals for the Northwood Futures development. These proposals have been developed following comments from both the public (as received during the June/July consultation event) and Hillingdon Council comments. The attached petition was brought to my attention during the consultation week, and I am sure you will welcome the opportunity to correct a number of the inaccuracies within the statements upon which the petition is predicated.

The proposals presented to date have been the culmination of 18 months dialogue with the local community, resulting in a scheme which meets the requirements listed by the local community, in October 2014. This includes the provision of a new station with step free access, a new transport interchange, new piazza, retention commuter car parking spaces and a retail offer that accommodates the food and beverage sector.

TfL has committed to the Northwood Futures public engagement campaign to understand both positive and negative comments, and provide regular updates; meeting transcripts; and development proposals have been shared publicly and online to ensure transparency. I am sure therefore you understand my alarm that some of these facts are at risk of mis-representation, through your statements, to the people of Northwood. In order to resolve this, I have commented under each of your statements:

Overpowering the whole aspect of Northwood by replacing 2-storey buildings with 4/5 storey buildings in height.

At the June consultation, community feedback requested a reduction of height, particularly within the southern half of the site, therefore the majority of buildings are now 2/3 storeys; however there are a few four storey buildings towards the north of the site.

Up to 500 new residents on this small site with only 57 dedicated parking spaces.

Since the June exhibition, density has reduced, subsequently residential unit numbers have reduced to 127, with approx. 25% 1 bed; 50% 2 bed; and 25% 3 and 4 bed units. Therefore, resident numbers are likely to be circa 310, not 500 as you state.

The loss of 17 local businesses some of long standing.

At the June exhibition, community feedback identified four existing priority uses on the site. These were Gentlemen's barber; Post office; Dry cleaners; and Shoe repairs (cobblers). TfL therefore committed to prioritise these within relocation provisions either through vacant TfL units or as part of an accommodation strategy for the scheme, whilst also assisting other businesses. This commitment has already commenced with the marketing of 65 Green Lane.

TfL has also agreed to extend existing leases where these were due to expire, so as to create more time for solutions to continued business operations.

Twelve residential tenants will lose their flats.

The existing accommodation is proposed to be demolished; however the current scheme proposes 127 new residential units, with a high percentage of these designated to affordable tenures. Numerous options for residential re-provision exist and TfL have commenced conversation with tenants.

No help has been offered by TfL to the affected businesses.

TfL has held continued conversations with tenants over the last 18 months, with the following assistance offered:

- i. Extension of existing occupation to allow more time to reach solutions;
- ii. The services of a dedicated business manager to assist with business plans, bid documentation etc., and lease terms;
- iii. Options surrounding relocation, such as turnover leases (i.e. TfL sharing any risk), or rent-free periods to cover fit-out and relocation costs; and
- iv. Project phasing to ensure continuation of business.

Removal of shops would threaten the vibrancy of Northwood's community.

Community feedback has repeatedly requested a re-invigorated retail proposition for the town, including a family-oriented food/beverage destination, alongside re-provision of some existing facilities as mentioned above.

The loss of 150 jobs across 17 businesses.

The current scheme includes almost double the existing retail footprint, therefore will increase jobs proportionally, and significantly, but will also provide flexibility regarding business relocation.

Loss of car parking spaces

There will be no loss of parking within the site, indeed parking spaces will increase across the scheme to 300. (NCP has a contract to provide 175 public parking spaces – this will be increased to 180, including an increase in disabled and brown badge parking provision).

Excessive traffic congestion.

BuroHappold have modelled the proposed traffic scenarios upon the revised junction, and this produces both an increase in junction capacity, and increases in traffic flows through the junction. A full traffic report will be submitted as part of any planning application.

Increased danger to local school children and the elderly who cross the roads due to increased traffic movements.

Notwithstanding the emotive nature and difficulty in measuring this statement's accuracy, the proposed scheme arranges bus stops and the new station around a pedestrian square, reducing the need to cross roads. Any road crossings, however, will be designed in strict accordance with regulations and highway standards, and will also reduce current informal wandering diagonally across the existing Green Lane/ Eastbury Road junction. The eastern edge of Eastbury Road is also being widened to create a safer environment for the large number of school children that wait on this corner before they cross Green Lane.

Substantially increased noise.

In order to substantiate this statement, it is necessary to have recordings/ readings of existing noise levels. TfL have taken these readings and these show the scheme will not substantially increase noise. This information will be available for all to review within any forthcoming planning application.

Increased air pollution due to higher traffic levels. Hillingdon has the highest increase in air pollution deaths.

Again, in order to substantiate this statement, it is necessary to have recordings/ readings of existing air quality. TfL have taken these readings, with models showing indiscernible differences in air quality, and comfortably within regulatory parameters. This information will again be available for all to review within any forthcoming planning application.

Many heavy lorry movements during demolition, deep excavation and rebuilding over years if the plans are approved.

Any construction activities will require delivery/waste vehicles. However, the impact of these is mitigated by careful phasing, and will be agreed with the Local Planning Authority, whereby the timings of vehicle movements will avoid busy traffic periods. These details will be controlled through any planning permission/ condition and the Construction Management plan.

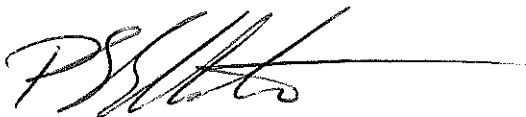
Northwood's Voice has no objection to change. It supports a new station with step-free access, development of the old Blockbuster site and on the existing tube car park.

It should be noted that the majority of buildings along Station Approach are in an advanced state of disrepair, therefore, regardless of any wider redevelopment scheme, change is inevitable. It should also be noted that a large number of the existing tenancies are due to expire within the next 6 – 12 months.

It is understood that Northwood's Voice has prepared development proposals for the site; TfL would be very grateful to see these. However, as has been stated publicly numerous times by TfL, any scheme needs to be viable with the costs of the public transport improvements (circa £22m) weighing heavily upon the scheme.

Having reviewed the above comments, I would be very interested within any substantiating information you may have behind these statements, as many appear inaccurate, spurious in instances, and potentially libellous. I would be grateful, therefore, if you would correct these inaccuracies and inform any signatories that may have signed to date.

Yours faithfully



Peter Elliott
Head of Property Development
Transport for London

cc. Nick Hurd MP, Member of Parliament for Ruislip, Northwood and Pinner;
Dr Onkar Sahota AM, London Assembly member for Ealing and Hillingdon;
Tony Ellis, Chairman of Northwood Residents' Association; and
Cllr Douglas Mills, Cabinet Member for Community, Commerce and
Regeneration, Hillingdon Council.



Appendix III
Northwood
Tenants Letter
dated 15th
September
2015

**Transport for London**

Commercial Development
Directorate (Property)

5th Floor, East Wing
55 Broadway
London
SW1H 0BD
siobhanjared@tfl.gov.uk

7th September 2015

**Ref – Northwood**

Dear 

At the TfL Northwood tenants' meeting, held in St John's church on 6th July 2015, I introduced myself as a resource to support you and your business during the next stages of any redevelopment proposal for TfL's Northwood estate. A transcript of this meeting can be found, and read, at <http://northwoodfutures.com/2015/07/14/transcript-from-tfl-tenants-meeting-6th-july-2015/>.

To refresh your memory, I work within an asset development role within TfL commercial projects, with the aim of procuring the appropriate retail proposition upon TfL's estate.

At the tenants' meeting, TfL confirmed the intention to work with all existing tenants to identify as comfortable a solution as possible, whilst accepting the Community's aspiration (as voiced through the numerous exhibition events held to date) to prioritise the categories of:

1. Gentlemen's barber;
2. Post office;
3. Shoe repairs (cobblers); and
4. Dry cleaners.

As TfL's Senior Category Manager responsible for Northwood, it is my role, as offered at the above meeting, to assist you in reviewing your existing business efficiency; formulating business plans; preparing bid documentation in response to vacant unit tenders; and understanding lease terms/ durations, especially in regards to turnover leases.

Whereas, I have spoken to a number of the tenants upon the estate, to date, I have not heard from you and wanted to check if you are interested in setting up some time to meet and review your future options.

You can book time on siobhanjared@tfl.gov.uk.

Please do not hesitate to contact me with any queries

Yours faithfully

Siobhan Jared
Senior Category Manager

cc. Nick Hurd MP, Member of Parliament for Ruislip, Northwood and Pinner;
Dr Onkar Sahota AM, London Assembly member for Ealing and
Hillingdon; and
Tony Ellis, Chairman of Northwood Residents' Association.



Appendix IV
Local Open
Space Audit
and
Playspace
Strategy

TFL Northwood Proposed Child Yield Calculation

Proposed Residential Development:

Detailed Component:

Flats: 93 (32 x 1 bed, 56 x 2 bed, 5 x 3 bed)

Outline Component:

Town Houses: 34 (6 x 3 bed, 28 x 4 bed)

Total: 127 homes

Assumed Indicative Mix (For purposes of assessment only):

	Market @ 83%	Affordable @ 17%		Total
		Intermediate @ 6%	Rent @ 11%	
1 Bed Flat	23	6	3	32
2 Bed Flat	45	2	9	56
3 Bed Flat	3	0	2	5
3 Bed House	6	0	0	6
4 Bed House	28	0	0	28
Total	105	8	14	127

Child Yield (using GLA 2012 child yield figures):

Age (School)	Total
0-4 (Nursery)	31
5-10 (Primary)	14
11-15 (Secondary)	6
16-18 (Secondary)	3
Total	54

When determining the play space requirements for new development, paragraph 4.24 of the GLA Shaping Neighbourhoods Play and Informal Recreation SPG (2012) recommends the proposed benchmark standard of providing a minimum 10 sq.m per child regardless of age. On the basis of the above calculations, 540 sq.m would need to be provided on site. However, this should be considered in the context of the site's location and proximity to existing space and facilities. This is considered further below.

Existing local play/open space provision audit

The London Plan 'Shaping Neighbourhoods Play and Informal Recreation' SPG (2012) recommends the following benchmark standards for play space in respect of different age bands:

Child Age	Actual Walking Distance from residential units (taking into account barriers)	Suitable Facilities
Under 5s	100m	Small age appropriate equipped play/public open spaces with potential for informal play, climbable objects
5-11	400m	Equipped age-appropriate play area, kickabout areas, skatepark
12+	800m	Adventure playgrounds, sport or recreation space with open access, skatepark, youth shelters, fitness trails

Hillingdon's Open Space Strategy 2011-2026 (2011) states that Northwood District Centre meets the quantity standard for all open spaces types, with provision in Northwood and Northwood Hills exceeding 6.0 hectares of unrestricted open space per 1000 population. With the addition of 127 units, it is considered that Northwood would still meet the quantity standard for all open space types.

However, the report also states that much of this provision is natural and semi-natural green space and the quantity of recreational open space falls below the minimum standard of 2 hectares per 1000 population. An additional 17 hectares of recreational open space is identified as being required during the lifetime of the Core Strategy to achieve the standard. The application site is constrained but provides an opportunity to deliver door stop playspace on-site for 0-5 year olds.

Current Position

The proposed development will provide appropriate play space on site for children between 0 and 5 years old. As the calculations above show, the development is expected to foster an approximate yield of 31 0-5 year olds (i.e. requirement for 310 sq.m play space). The proposed development will provide 352 sq.m of playspace in the form of raised garden which will include simple, robust and 'natural' play elements, thereby meeting and exceeding GLA requirements.

We consider there to be enough suitable, existing play space in the local area that is within walking distance to mitigate the need for further play space for other age groups to be provided on-site.

The existing local open/play space and their details are provided in the table below. Aerial images of each site are provided in Appendix 1.

Site Ref/location	London Plan Classification	Distance from site (taking into account barriers)	Size	Facilities
1. Frithwood Park	Local Park/Open Space	600m	1.17 ha	Open space, large formal play area – apparatus includes swings/slides etc., informal play areas, wooded areas.
2. Northwood Lawn Tennis Club	Local Park/Open Space	850m	4 x tennis courts	4 astro turf tennis courts
3. Hogs Back	Local Open Space	1.2km	3.35 ha	Open space, wooded areas
4. The Gravel Pits	Local Open Space	750m	5.56 ha	Open space, wooded areas
5. Northwood Recreation Ground	District Park	1.2km	8.92 ha	Recently refurbished playground area, multi-use sports pitches, tennis courts
6. Haste Hill (Adjacent to Northwood Recreation Ground)	Local Park/Open Space	1.2km	2.20 ha	Open Space
7. Highfield Crescent	Small Open Space	1km	0.066 ha	Open Space
8. Ruislip Woods National Nature Reserve	N/A	2.2km	58.29 ha	Woodland

Appendix 1: Site Photos

1. Frithwood Park
2. Northwood Lawn Tennis Club



Image Source: Google Maps 2015

3. Hogs Back



Image Source: Google Maps 2015

4. The Gravel Pits



Image Source: Google Maps 2015

5. Northwood Recreation Ground
6. Haste Hill (East of Northwood Cemetery, South of Recreation Ground)



Image Source: Google Maps 2015

7. Highfield Crescent



Image Source: Google Maps 2015

8. Ruislip Woods National Nature Reserve

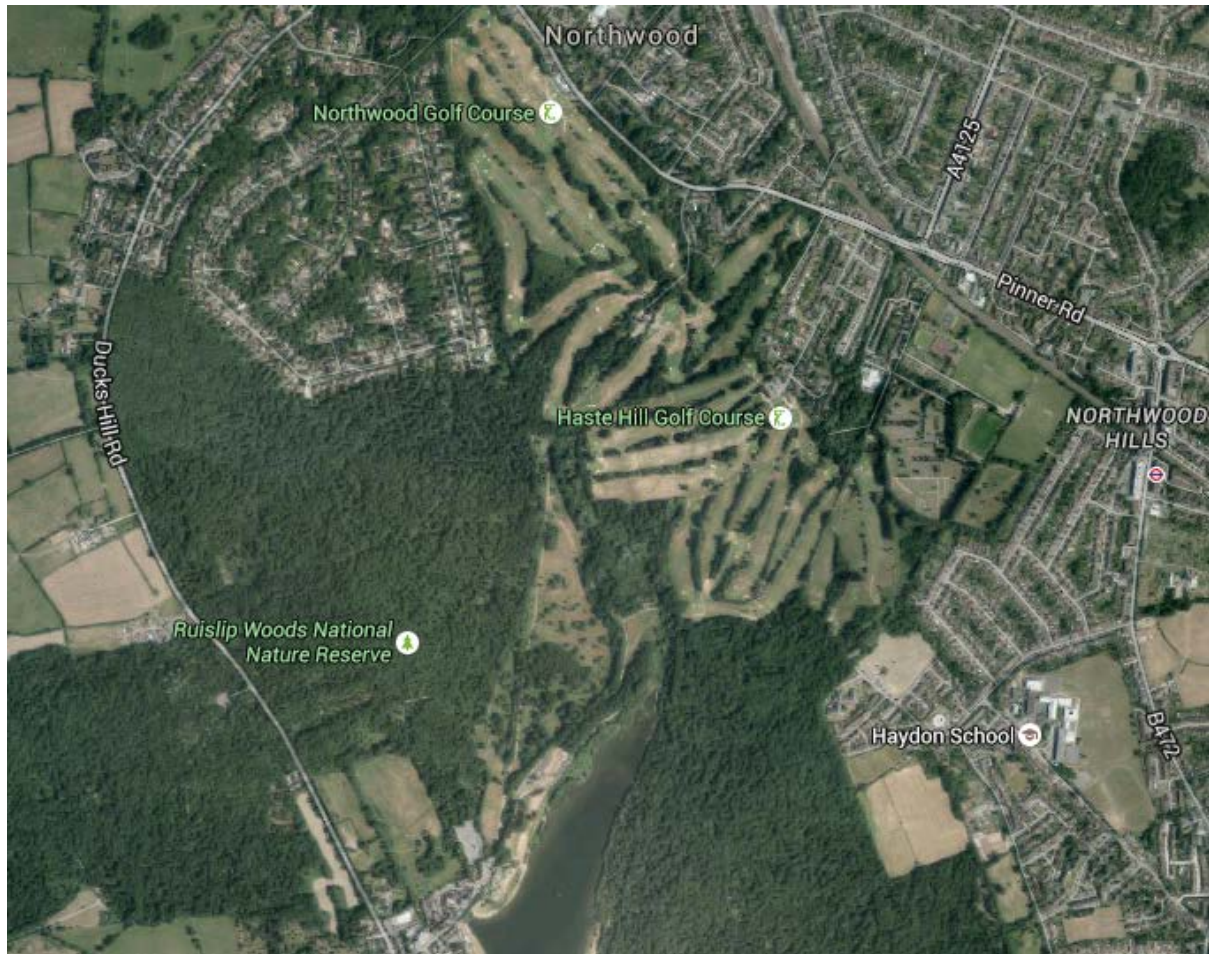


Image Source: Google Maps 2015