

**Northwick Park Hospital, Watford Road**

in the London Borough of Brent

planning application no. 19/4272

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Erection of a multi-storey car park on 5 levels for staff only, a plant/energy facility and associated works to access road at Northwick Park Hospital.

**The applicant**

The applicant is **Apcoa Parking on behalf of Northwick Park Hospital** and the architect is **Sadler Brown Architecture**.

**Strategic issues summary**

**Principle of development:** The rationalisation and replacement of the existing staff car parks and reduction of parking spaces across the Trust's land is supported in principle, however appropriate planning mechanisms to prevent the simultaneous use of the existing and additional parking should be secured. (paras 17-22).

**Urban design:** The proposed architecture is functional and considered acceptable given the nature of the development. (paras 23-25).

**Air Quality:** The proposals represent a reduction in car parking spaces and a reduction in vehicle trips and is not predicted to lead to adverse impacts on local air quality and is therefore supported. A construction dust risk assessment and compliance with non-road mobile machinery low emission zone should be secured by condition/obligation (paras 27-36).

**Transport:** The provision of staff cycle parking and staff disabled parking should be secured by conditions/obligations. A Construction Logistics Plan, a Travel Plan and a Car Park Management Plan should be secured by condition/obligation (paras 32-37).

Further information on **energy** is required.

**Recommendation**

London Borough of Brent Council be advised that the application does not yet fully comply with the London Plan and the Intend to Publish London Plan, for the reasons set out in paragraph 40 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

## Context

1 On 24 January 2020, the Mayor of London received documents from Brent Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3F of the Schedule to the 2008 Order:

- 3F *'Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.'*

3 Once the London Borough of Brent has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The approximately 0.3-hectare site is part of Northwick Hospital and comprises a staff car park with 141 spaces.

6 The application site is within the demise of Northwick Park Hospital which is accessible through Watford Road (A404), part of the Strategic Road Network (SRN). The nearest part of the Transport for London Road Network (TLRN) is over 4 kilometres from the site. The nearest rail station is Northwick Park, approximately 800 metres to the north of the site and served by the Metropolitan Line services. There are seven bus routes operating in the vicinity of the site, with the nearest bus stops near the main site entrance on Watford Road. The site records a public transport access level (PTAL) of 5, with 6b being the highest. Part of the Greenford to South Kenton section of the Capital Ring – which accommodates pedestrians and cyclists – runs east-west along the southern boundary of the larger site. On-footway cycle lanes are presented on both sides of the carriageway along Watford Road.

7 The site sits within the context of a wider masterplan proposal to deliver a large residential-led, mixed use scheme at Northwick Park.

## Details of the proposal

8 The proposal comprises the erection of a multi-storey car park (MSCP) to provide 695 car park spaces (3,500 sq.m). The proposed building would be set over five floors and would contain two staircase cores, with the north western core containing passenger lifts.

9 A two-storey shell volume is incorporated within the building to provide for a future fit out for an energy centre associated with future planning applications.

10 The proposed development would provide spaces for active and passive electric charging points.

## Strategic planning history

11 In May 2003, the Mayor considered a Stage 1 referral (reference: PDU/0611/01) for an outline planning permission for a mixed-use development comprising residential, office, retail, restaurant/bar, leisure, multi-purpose sports pitch and open space. This application was subsequently withdrawn by the applicant.

12 The application site sits within the context of a wider masterplan for a residential-led development of Northwick Park Estate, which has not yet been submitted as a planning application.

13 The applicant has not engaged in any pre-application discussions with the GLA regarding the current proposal.

## Strategic planning issues and relevant policies and guidance

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Brent Council's 2010 Core Strategy Development Plan Document (DPD); the 2011 Site Specific Allocation Development Plan Document; the 2016 Development Management Policies; and, the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011).

15 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan; the Mayor's Transport Strategy; Mayor's Environment Strategy*
- Urban design *London Plan;*
- Environment *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; Mayor's Transport Strategy.*

16 The following are relevant material considerations:

- the National Planning Policy Framework and National Planning Practice Guidance;
- The London Plan – Intend to publish version (December 2019), which should be considered on the basis explained in the NPPF; and,
- Brent Council Draft Preferred Options Local Plan (2018).

## Principle of development

17 Policy GG2 of the Intend to Publish London Plan states that development proposals should support a strategic target of 80% of all journeys using sustainable travel, enabling car-free lifestyles. London Plan Policy 2.13 and Policy SD1 of the Intend to Publish London Plan also state that development proposals within Opportunity Areas should promote inclusive access including cycling and walking, and such proposals should meet the ambitious mode share targets as set out in Policy T1 of the Intend to Publish London Plan and the Mayor's Transport Strategy. London Plan Policy 6.13 and Policy T6 of the Intend to Publish London Plan provide further detail on preventing excessive car parking and

promoting car-free development.

18 Policy GG3 of the Intend to Publish London Plan states that those involved in planning and development must seek to improve London's air quality and reduce exposure to poor air quality. London Plan Policy 7.14 and Policy S11 of the Intend to Publish London Plan requires development proposals to minimise exposure to existing poor air quality and make provision to address local air problems of air quality.

19 The proposed multi-storey car park, with 695 car parking spaces, is proposed in the context of the planned Northwick Park Estate development, which aims to deliver a residential-led development across the wider site. London North West University Healthcare Trust (the Trust) has disposed of land to Network Homes, which includes existing staff car parking facilities. The development of the masterplan would therefore lead to loss of a large proportion of hospital staff car parking areas and it is intended that the use of existing car parks will cease from March 2021.

20 The proposed development would be a replacement, rationalisation and centralisation of existing staff parks to a new MSCP, which would also result in a reduction of around 200 parking spaces across the site. The proposed rationalisation of the existing car parking on the site, facilitating more efficient land use of the existing surface level car parks, and resulting in an overall reduction in parking spaces is supported in principle.

21 The applicant has submitted information to demonstrate that the number of parking spaces proposed is necessary for the operational needs of the hospital's staff. The applicant's submission includes a Car Park Management Plan (CPMP), which outlines that the overall parking policy of the hospital aims to incorporate more sustainable modes of transport for staff travel, which is consistent with Policy T1 of the Intend to Publish London Plan.

22 Whilst the principle of the development is accepted, it is important that any planning permission for the MSCP does not lead to an increase in the level of parking on the wider site, and as such, a condition or appropriate planning mechanism should be agreed to ensure that the MSCP does not become operational until the existing car parking (that is proposed to be displaced) ceases to be used.

## **Urban design**

23 London Plan Policies 7.1 and 7.4 and Policies D1 and D2 of the Intend to Publish London Plan seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.

24 The proposed architecture and materials for the parking structure are largely functional, which is appropriate for a multi-storey car park and is acceptable. The height and form of the proposed building would be consistent with the scale and character of the hospital buildings.

## **Fire statement**

25 In accordance with Policy D12 'Fire safety' of the Intend to Publish London Plan, all

major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The applicant is as such required to submit a Fire Statement by a third party suitably qualified assessor. The Fire Statement should be submitted prior to determination. The council should then secure its implementation through an appropriate condition.

## **Environment**

### Energy

26 The application is not accompanied with an energy statement. In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the Intend to Publish London Plan, the applicant is required to submit an energy strategy, setting out how the development proposes to reduce carbon dioxide emissions. The applicant is encouraged to maximise provision of renewables (such as PV panels) and storage for electricity generation. The applicant should provide this information prior to a Stage 2 referral.

### Air Quality

27 London Plan Policy 7.14 and Policy SI1 of the Intend to Publish London Plan requires development proposals to minimise exposure to existing poor air quality and make provision to address local air problems of air quality, particularly within AQMAs, and should take an Air Quality Neutral approach. Policy SI1 further states that development proposals should not lead to further deterioration of air quality and should not create an unacceptable risk of high levels of exposure to poor air quality.

28 The proposals represent a reduction in car parking spaces. Combined with the provisions of the car park management plan, it is predicted that there will be a reduction in vehicle trips. The MSCP will be open-sided and naturally ventilated. As such, it is not predicted that the development will lead to adverse impacts on local air quality and is therefore compliant with London Plan Policy 7.14 (b) and Policy SI 1 (B) of the Intend to Publish London Plan.

29 London Plan Policy 6.13 (D) requires all developments to ensure that 1 in 5 parking spaces provide an electric vehicle charging point (both active and passive). The proposed development will include 67 active electric vehicle charging points, which does not meet this requirement. However, it is noted that this is a marked improvement on the current situation. The applicant is encouraged to explore other measures, for example rapid charging provision, in order to accommodate for future growth in the electric vehicle market.

30 Details regarding the operational impacts of the energy centre have not been provided, as detailed design of the centre does not form part of this application. Any future application for an energy centre must provide an assessment of impacts on local air quality prior to future operation.

31 In order to ensure that the development is built in accordance with relevant GLA policies, it is recommended that the following be secured by condition or legal agreement:

- Compliance with the Non-Road Mobile Machinery Low Emission Zone for London (Policy 7.14 (b) and Policy SI 1 (D) of the Intend to Publish London Plan);

- A construction dust risk assessment accompanied with a dust management plan containing measures to control emissions during construction and demolition prior to commencement of work (Policy 7.14 (b) and Policy SI 1 (D) of the Intend to Publish London Plan.

## **Transport**

32 The proposed development would result in a reduction in staff car parking spaces across the site, and a decrease in vehicle trip generation is anticipated. As such, the development is supported in principle, provided that appropriate planning mechanisms are secured to ensure that the additional parking cannot be used in conjunction with the existing parking areas that are envisaged to be displaced, as explained in paragraph 22 above. The access arrangements to the site remain unchanged and no concerns are raised in terms of the internal access arrangements for vehicles, pedestrians and cyclists, subject to approval by the Council.

33 Any traffic impacts during the construction phase should be identified and detailed in the Construction Logistics Plan, along with appropriate mitigation. A Construction Logistics Plan and a full Travel Plan should be secured.

### Car Parking

34 The rationalisation of the staff parking facilities and a reduction of parking spaces across the site is supported. The inclusion of 67 active electric vehicle charging points (EVCPs) and 69 passive EVCPs is a marked improvement on the existing situation and therefore welcomed.

35 Disabled parking spaces are planned to be redeployed across the site, close to building entrances. This is acceptable in principle, but the location of all redeployed disabled parking should be provided in the final Car Park Management Plan, which should be secured.

### Cycle Parking

36 The application documents do not include information on the provision of additional staff cycle parking, which should be improved across the site to provide an alternative to car use. The provision of additional staff cycle parking would be consistent with Policy T1 of the Intend to Publish London Plan, which promotes the Mayor's target of 80 per cent of all trips to be made by foot, cycle or public transport by 2041; and Policy T5, which requires the provision of cycle parking in accordance with the minimum standards in Table 10.2. Details on cycle parking and additional staff cycle parking should be secured.

## **Local planning authority's position**

37 Brent Council planning officers are currently considering the proposal. A committee date for the application has not yet been set.

## **Legal considerations**

38 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning

authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

39 There are no financial considerations at this stage.

## Conclusion

40 London Plan and London Plan Intend to Publish Version policies on urban design, air quality, energy and transport are relevant to this application. While the application is supported in principle, it does not fully comply with the London Plan and London Plan Intend to Publish Version as set out below:

- **Principle of development:** The rationalisation and replacement of the existing staff car parks and reduction of parking spaces across the Trust's land is supported in principle, however appropriate planning mechanisms to prevent the simultaneous use of the existing and additional parking should be secured.
- **Urban design:** The proposed architecture and materials are acceptable given the nature of the development. A fire statement should be submitted.
- **Environment:** Further information has been requested on the energy strategy. The proposals represent a reduction in car parking spaces and a reduction in vehicle trips and is not predicted to lead to adverse impacts on local air quality and is therefore supported. A construction dust risk assessment and compliance with non-road mobile machinery low emission zone should be secured by condition/obligation.
- **Transport:** The provision of staff cycle parking and staff disabled parking should be secured by conditions/obligations. A Construction Logistics Plan, a Travel Plan and a Car Park Management Plan should be secured by condition/obligation.

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