

TfL Landholdings at Northwood**HA6 2QB****in the London Borough of Hillingdon****planning application no. 71083/APP/2015/4037****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

Hybrid planning application for the comprehensive redevelopment of the site comprising full planning permission involving the demolition of existing buildings to provide 93 residential units (C3), associated car parking, and 1,440 sq.m. of new retail (A1-A5), a new operational railway station (suit generis) with step free access and associated station car parking, 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.

The applicant

The applicant is **Transport for London (property)** and the agent is **Bilfinger GVA**. The architect is **Fletcher Priest Architects**.

Strategic issues

The principle of the redevelopment of the site is generally supported. Outstanding strategic issues with regards to **housing and affordable housing, inclusive design** and **transport** should, nevertheless, be resolved before the application is referred back to the Mayor.

Recommendation

That Hillingdon Council be advised that while the application is generally acceptable in strategic planning terms, the application does not comply with the London Plan, for the reasons set out in paragraph 105 of this report; but that the possible remedies set out in the same paragraph could address these deficiencies.

Context

1 On 9 November 2015 the Mayor of London received documents from Hillingdon 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 has until 18 December 2015 to 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 Categories 2C and 3F of the Schedule to the Order 2008:

Category 2C

Development to provide—

(d) a railway station

Category 3F

1. 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 Hillingdon Council 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.

Site description

5 The 1.91 hectare application site is located in Northwood on the junction of Green Lane (B469) and Eastbury Road. It comprises land north and south of Green Lane including part of the highway but the majority of the site lies south of Green Lane.

6 The area of land north of Green Lane comprises a parade of retail units spanning over the railway bridge. The area south of Green Lane comprises the existing Northwood 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.

7 The site is bounded to the north by Green Lane (although the proposals include works to a small site to the north of Green Lane as mentioned above), to the south by the London Underground compound and to the west by the railway line. Station Approach currently provides access to the site. Central Way which marks the eastern edge of the site with the rear of Northwood Central Club, St John's United Reformed Church and residential properties fronting Hallowell Road leads to a public car park operated by National Car Parks (NPC) predominantly used by commuters. A Waitrose and associated car park sit on the other side of the railway to the west.

8 The site is part of Northwood town centre and falls in the Green Lane Conservation Area. There are no listed buildings within the boundary of the site.

9 In terms of transport, the site is remote from the Transport for London Road Network (TLRN) and the nearest section of the Strategic Road Network (SRN) is the A404 Rickmansworth Road located 650 metres to the west of the site. Northwood station, which resides within the site's boundary provides access to London Underground services on the Metropolitan Line. Four bus routes serve the site (buses 8, 331, 282 and H11; the former being a county service). Bus stops are located both within the site and on Green Lane. The public transport access level (PTAL) of the site ranges from a moderate 3 (on a scale of 1 to 6 where 6 is excellent and 1 is very poor) to 2 within the southern half of the site.

Details of the proposal

10 The proposal is submitted as an hybrid planning application. Full planning permission is sought for the demolition of the existing buildings and the provision of 93 residential units (C3) and associated car parking in approximately four to five storey buildings, 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. 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.

11 Outline planning permission is sought for the remainder of the proposed development. With respect to the outline components, all matters (including scale, layout, landscaping and appearance) are reserved for future determination, except for access. The outline components comprise the provision of up to 34 residential units (townhouses) and associated car parking and landscaping.

Case history

12 The applicant site has no relevant strategic planning history, however, the proposal was discussed at pre-application stage with GLA officers on 14 September 2015.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Retail *London Plan; Town Centres SPG*
- Housing/Affordable housing *London Plan; Housing SPG; Interim draft Housing SPG; Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Urban design *London Plan;*
- Access *London Plan; Accessible London SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Parking *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

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 the Hillingdon Local Plan: Part 1- Strategic Policies (November 2012), the Unitary Development Plan Saved policies (September 2007) and the 2015 London Plan (Consolidated with Alterations since 2011).

15 The following are also relevant material considerations:

- The National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG);
- Minor Alterations to the London Plan – draft Housing standards and Parking standards (May 2015);
- The Mayor's draft Interim Housing Supplementary Planning Guidance (May 2015);

- The Accessible Hillingdon SPD (2013) and Planning Obligations SPD (2014);
- The Hillingdon draft Local Plan: Part 2 –Development Management Policies, Sites Allocations and Designations and Policies Map – Revised Proposed Submission version (October 2015).

Principle of development

16 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 (Policy SA16: Northwood Station, Green Lane). The site is currently underutilised and in a town centre location.

Retail

17 As noted in paragraph 8, the site is located in Northwood town centre which is categorised in the London Plan as a district centre.

18 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, in particular, seeks to ensure that the scale of the retail proposals accords with the town centre hierarchy and relates to the size, role and function of a town centre and its catchment.

19 It is proposed that the 17 existing retail units on site be replaced with 24 units, equivalent to 1,440 sq.m. (GIA) of retail floorspace. To respond to the market and meet prospective tenant requirements, flexible class A1/A2/A3/A4/A5 uses is being sought across the proposed floorspace.

20 The new retail floorspace will contribute towards the vitality and viability of the existing district centre and will improve the quality of its retail units. The proposed retail floorspace is therefore supported in strategic terms in line with London Plan Policy 4.7.

Transport

21 London Plan Policy 6.1 supports developments which seek to improve the capacity and accessibility of public transport and interchange between different forms of transport.

22 It is proposed that the redevelopment of the site improves the transport infrastructure provision in Northwood through the delivery of new facilities at Northwood London Underground (LU) station, including step free access to the station platforms and from the car park, and a new station ticket hall. The proposed development also includes the re-provision of the commuter car park and an improved public transport interchange between the LU station, LU buses and the pedestrian/cycle environment.

23 The proposed station redevelopment is supported in strategic terms in accordance with London Plan Policy 6.1.

Housing

24 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The London Plan sets a target for the Council to deliver a minimum annual housing target of 559 homes in the Plan period 2015-2025. The principle of the redevelopment of this site for housing is supported in strategic terms.

Summary

25 The principle of the redevelopment of the site for a residential-led mixed use development with improved transport infrastructure is acceptable in strategic planning terms.

Housing and affordable housing

26 The application considered here proposes a total of 127 new dwellings, which include 93 flats and up to 34 townhouses. The proposed housing schedule is summarised in table 1 below:

Application	Unit type	No of units	%
Detailed	one-bed	32	25
	two-bed	56	44
	three-bed	5	4
Outline	Three or four bed house	34	27
	Total	127	100%

Table 1: Proposed accommodation schedule

Affordable housing

27 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and; the specific circumstances of individual sites. Policy 3.12 also states that affordable housing should normally be provided on-site.

28 The applicant has submitted a financial viability report in support of its proposals which is being independently assessed by the Council. It is therefore not possible at this stage to comment on the applicant's affordable housing offer and determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12 and the Council's affordable housing policy. The results of the independent report will need to be shared with GLA officers before the application is referred back to the Mayor at stage 2.

29 London Plan Policy 3.11 also establishes a strategic tenure split target of 60% social/affordable rent and 40% intermediate. For the 60% component, affordable rent will usually best maximise affordable housing delivery. At this stage it is proposed that 64% of the affordable units would be affordable rent and 34% intermediate tenures across the detailed and outline components of the application. The submitted documents indicate that intermediate tenure units would be best suited to 1 or 2-bed units.

30 Whilst it is understood that the final amount and mix of affordable housing will be determined following the completion of the viability appraisal, the tenure mix as currently proposed would be acceptable in principle. Hillingdon Council should however ensure that the proposed tenure mix and rent levels meet an identified need in the borough.

Housing Choice

31 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments.

London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes.

32 As set out in table 1, the proposed residential units would comprise one, two, three apartments and three to four bedroom townhouses.

33 The proposed unit mix and provision of family sized housing is supported. However, at the strategic and local levels, priority is given to affordable family homes. The applicant should therefore seek to maximise the provision of family sized affordable homes within the proposed affordable rent component in line with policy. The Council should also confirm that the proposed mix meets local housing needs.

34 Policy 3.8 also requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with "ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'". Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with "ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users". In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

35 The application has advised in its submitted documents that the majority of homes would be designed to Lifetime Homes Standards (89 of 93 units) and that 96% of the units across the site would be capable of being adaptable to wheelchair accessible standards. Whilst this exceeds the M4(3) requirements, this does not comply with M4(2) as discussed in the inclusive design section below and should be addressed. The Council should secure M4(2) and M4(3) requirements by condition, including the submission of a plan to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of a scheme has considered the standard.

Density

36 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the density matrix in support of this policy. Based on the characteristics of the location set out in the site description section of this report, the site can be regarded as having an 'urban' setting with PTAL rating which ranges between 2 and 3. For this setting, the matrix suggests a residential density in the region of 200-450 habitable rooms per hectare and 45-170 units per hectare.

37 Based the calculation outlined in the Mayor's Housing SPG, the proposed development generates a density of 129 units per hectare, which is within the suggested density range for a site in this location. The proposed density is therefore acceptable in principle. However, the applicant should note comments made in this report regarding residential quality and accessibility and children's play space.

Children's play space

38 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor's 'Shaping Neighbourhoods: Play and Recreation'

SPG requires proposals that include housing to provide 10 sq.m. of playspace per child, with dedicated play space for children under the age of 5 on site as a priority.

39 The applicant has advised that the proposed development will generate an estimated 54 children across all age groups and across the proposed development (detailed and full components). Given the constraints of the site, it is proposed that the 354 sq.m of new public green space at the centre of the site be used as a flexible shared space for residents, visitors and for informal play activities for children between 0-5 years (approximately 31 children).

40 The applicant's landscaping strategy suggests the inclusion of interactive pieces of play equipment to allow children to play but no dedicated play area has been identified on site and GLA officers have concerns with the quality and the safety of the space for children to play given that the public square is located at the entrance of a transport hub.

41 The applicant's proposal does not currently meet the policy requirements of the London Plan and a dedicated play area should be identified in the 'garden' for children to play.

42 The applicant is not proposing to deliver any play space for children aged 6 and more on site and has argued that older children will have access to the existing play facilities available in the surrounding area and to their own private amenity space. Based on the information provided, this is not acceptable and the applicant should demonstrate that suitable play spaces (in terms of quality, quantity and accessibility) are provided in the vicinity of the site. Contributions may also be offered to the Council to expand or improve existing spaces or make the routes to the play spaces safe, if necessary. Opportunities to use St. Helen's school's sport centres next to the site could be explored.

Historic environment and urban design

43 Good design is central to the objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. The design approach taken by the applicant has been discussed extensively at pre-planning application stage. The applicant has responded positively to some of the advice given by GLA officers at pre-application stage but some concerns remain as set out below.

Impact on heritage asset

44 As mentioned in paragraph 8, the site falls in the Green Lane Conservation Area but none of the buildings on site are listed. The proposal involves the demolition of the former National Provincial Bank building at the corner of Station Approach and Green Lane which is recognised as being of significant quality and as making a positive contribution to the Green Lane Conservation Area. The redevelopment of the site would also result in the demolition of a prominent part of the conservation area.

45 London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate and makes clear that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to development which affects any buildings or other land in a conservation area, "*special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area*". The National Planning Policy Framework encourages local planning authorities to identify and assess the particular significance of any heritage assets

that may be affected by a proposal and to consider the impact of the development on the significance of this asset. It further clarifies in paragraph 134 that *“where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”*

46 The applicant has provided a heritage appraisal which assesses the potential effect of the development on the heritage significance of the conservation area and existing buildings. The heritage appraisal concludes that the majority of the buildings in the site make a neutral contribution to the overall character and appearance of the conservation area, except for one building, the former bank building, which makes a positive contribution. The applicant acknowledged its demolition would be regrettable.

47 Having considered the redevelopment proposals, and whilst the loss of the former National Provincial Bank building is disappointing, GLA officers accept that a case has been made to justify the loss of the building given the considerable public benefits of the scheme through the provision of additional housing in an accessible town centre location with a new step free access station and improved transport infrastructure.

Proposed site layout

48 Concerns were raised at pre-application stage about the general layout of the proposal and the treatment of Central Way in particular, which did not provide enough active frontages along it to make it feel safe and welcoming.

49 In response to GLA officers’ pre-application comments, changes have been made by the applicant to the Central Way frontage, where an additional core entrance, a retail unit, a green wall and a facilities management office have been provided. These changes are welcomed and have all added to the activation of the frontage. While GLA officers consider that Central Way could have been further activated as advised by the Mayor’s Town Centres SPG which stresses that active frontages should be maximised wherever development faces publically accessible space, the efforts made by the applicant to activate Central Way are acknowledged, and on balance, the activation of the street is now acceptable.

Residential quality

50 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Housing SPG. The treatment of London Plan housing standards in relation to new national housing standards is set out in the housing section above.

51 Improvements have been made to the scheme since it was last presented at pre-application stage. The latest plans provided by the applicant suggest a high residential quality with residential units that meet or exceed the Mayor’s space standards, a good ratio of units served from each core and external corridors which ensure a high amount of dual aspect units. The internal cores also benefit from direct ventilation and natural daylight. All the ground floor units have their own front door, which is also strongly supported.

52 Whilst the proposed development provides a good amount of private amenity space with private balconies, gardens, and roof terraces accessible to residents within the blocks, no dedicated play space has been provided for children to interact and play. This is contrary to London Plan Policy 3.6 and the Mayor’s Play and Informal Recreation SPG and is further discussed in the children’s play space section of this report.

53 Four residential units facing the square are not level accessed and therefore do not meet Part M of the Building Regulations. This issue is covered in the inclusive design section of this report.

Height and massing

54 The overall height and massing of the scheme is welcomed, given its transport accessibility and town centre location. The architectural approach is very high and is supported. However, the final choice of materials and the quality of detailing will have a significant impact on the overall quality in the completed scheme. As such the applicant is asked to include a commitment to this by including a clause in the S106 agreement that will ensure the same architects, or ones of a similar calibre, are retained to produce all construction drawings or a budget is allocated to allow them to review these when they get produced.

Proposed townhouses in the outline application

55 The applicant proposes to deliver 34 town houses located south of the site as part of an outline application. To ensure the residential quality of the townhouses, the design specification should make a commitment that all of the units proposed meet the Mayor's standards set out in the Housing SPG.

Inclusive Access

56 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

57 The applicant has stated that the proposed scheme would meet Part M of the Building Regulations. The proposed development will provide a new step free access underground station and level access throughout the proposed piazza and the northern end of the site which is strongly supported. However, to meet Part M of the Building Regulations, level access on the rest of the site should also be achieved as explained below.

Residential

58 The applicant's Access Statement discusses accessibility in terms of Lifetime Homes requirements and wheelchair accessibility. As discussed under 'Housing choice' above, the applicant should provide further detail, and as a minimum it should detail how the proposals respond to Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. The wheelchair accessible units should be identified on floorplans and typical flat layouts provided. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people.

59 The applicant noted in its submission that all residential entrances within the scheme would provide level access, except for four units which are separated from the piazza level by approximately 400mm. This does not comply with Part M of Building Regulations and should be addressed by the applicant before the application is referred back to the Mayor at stage 2.

60 As discussed in the transport section of this report, further information is required on the management of the proposed Blue Badge parking spaces. The accessibility of the cycle spaces in the basement of the apartment blocks could also be improved.

Public realm

61 Surface treatments, colours and materials have been selected by the applicant to ease navigation across the site. The applicant is also proposing to include timber seating as part of the public space. Whilst this is welcomed, some of seating should incorporate back rests and arm rests to ensure that as many people as possible can use it.

Climate change adaptation

62 London Plan Policy 5.10 promotes urban greening, such as new planting in the public realm and multifunctional green infrastructure. In conjunction with this, London Plan Policy 5.11 requires that major development is designed to include green roofs, where feasible. London Plan Policy 5.12 seeks to prevent flood risks and Policy 5.13 raises the importance of utilising sustainable urban drainage systems.

63 The site is within Flood Zone 1 but the rail corridor is identified as being at risk of surface water flooding. The flood risk assessment undertaken by Buro Happold has acknowledged the surface water flood risk and is proposing to design a kerb line that will channel surface water from outside the site into oversized pipes for attenuation up to the 1 in 100 year event. This represents an acceptable approach to the risks presented at this site and therefore complies with London Plan Policy 5.12.

64 The FRA and drainage strategy prepared by Buro Happold has acknowledged the need to include sustainable drainage at this development. The drainage strategy proposes to use attenuation tanks with a 3x greenfield run-off rate to control surface water run-off. The lack of more sustainable forms of drainage management is disappointing, especially given the pre-application advice. In particular, the unsuitability of infiltration techniques has been assumed rather than demonstrated by on site soakage testing - it is notable that the site is on the border of an area of Lambeth soils which are often suitable for infiltration.

65 The development introduces some areas of soft landscaping where there is currently hard standing, therefore there will be further surface water discharge reductions that the drainage strategy has not accounted for. Given this, the proposed approach is considered to be the minimum acceptable in order to conform with London Plan Policy 5.13

66 In accordance with London Plan Policies 5.10 and 5.11, the Council should secure the delivery of the proposed biodiverse roofs.

Climate change mitigation

Energy efficiency standards

67 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

68 The demand for cooling will be minimised through shading from balconies, mechanical ventilation and exposed thermal mass in the non-domestic units. The applicant has undertaken a dynamic overheating assessment for the dwellings using both CIBSE Guide A and CIBSE TM52 methodologies. The applicant has modelled dwellings considered worst case, including dwellings facing the railway line where windows will be not open due to noise. The results presented in the

report show that the both of the CIBSE Guide A and TM52 requirements are met for the sample models. The applicant has also demonstrated that the cooling demand for the retail units will be reduced following the passive design measures proposed.

District heating

69 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development.

70 The applicant is proposing to install a communal heat network for the apartments. Individual gas boilers are proposed for the townhouses due to the relative low density and distances involved. In addition Block 7 will be individual boilers due to its location on the other side of the main road. This approach is accepted in this instance.

71 The applicant has provided a commitment to ensuring that the communal heat network will be designed to allow future connection to a district heating network should one become available.

72 The site heat network will be supplied from a single energy centre and will be located in the basement of block 4. An indicative plant room layout has been provided.

Combined Heat and Power

73 The applicant is proposing to install a 25 kWe gas fired CHP unit as the lead heat source for the communal heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (70-80% of the total heat load).

74 The applicant currently assumes that the CHP will be managed by the onsite Facilities Management team with the use of servicing contracts from specialist CHP servicers. Due to the relatively low electrical output it is anticipated that the electricity generated will be utilised on-site by the landlord supply. The applicant has undertaken an operational cost analysis to determine whether the small CHP proposed is viable to run in practice, this is welcomed. The applicant's analysis estimates that the resulting heat sales cost to customers and the annual cost per unit of heat per unit delivered is expected to be lower with the CHP than without.

Renewable energy technologies

75 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install roof mounted Solar Photovoltaic (PV) panels on the townhouses with a total PV capacity of 135kWp (863m² in panel area). A roof layout drawing has been provided.

Summary

76 A reduction of 79 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

Transport

Car parking

77 The applicant will reprovide 180 of the 191 public car parking spaces currently on site of which 17 will be designated for disabled users.

78 The London Plan SPG Land for Industry and Transport supports park and ride schemes in outer London where it can be demonstrated that they will lead to overall reductions in congestion, journey times and vehicle kilometres. The applicant should therefore provide the origin data of car park users so that its retention can be considered against London Plan Policy 6.13.

79 A total of 118 residential car parking spaces are proposed with an overall ratio of 0.93 spaces per unit. Parking for the 4 bed townhouses is provided at 2 spaces per unit and parking for the 3 bed townhouses will be provided at 1.5 spaces per unit. The apartments will be allocated 0.52 spaces per unit.

80 The parking provision for the apartments is acceptable however it is noted that the quantum of spaces proposed is at the maximum permissible under the London Plan and there would be a scope for reduction considering the proximity of a London Underground station and the site's moderate PTAL in line with the overarching sustainability objectives of London Plan Policy 6.13.

81 Electrical vehicle charging points (EVCP) will be provided in line with London Plan policy, however the applicant should clarify where the 12 disabled parking spaces will be located.

82 A draft car parking management plan inclusive of enforcement measures, disabled parking and EVCPs has been submitted which is supported. It is also recommended that all communal spaces are leased to ensure that they are efficiently managed and that they are available for blue badge holders as necessary. The final document should be secured by condition to be discharged by the Council in consultation with TfL.

Cycle parking

83 To cater for Northwood Station the applicant is proposing to increase the 13 cycling spaces currently located on site to 23; these will be located in a covered area 10 metre south of the station entrance. This is welcomed.

84 It is proposed that 54 retail spaces are provided in the public piazza. The overall quantum complies with London Plan policy, however, at least eight of these spaces need to be located internally and allocated for long stay staff parking. The applicant is proposing to install cycle parking in line with demand, however, this would be resisted as the perception of lack of cycle parking can be a barrier to cycling and therefore all 54 spaces should be provided at the outset.

85 For the residential units, 226 spaces are proposed which will be located within the basement for the apartments and on plot for the townhouses. The quantum of spaces proposed is considered to be acceptable, however, the accessibility of the spaces within the basement could be improved by relocating them closer to the residential cores. In addition, shower and changing facilities should be available for all staff employed on site.

Impact assessment

86 The applicant has undertaken a multi-modal impact assessment for the residential and retail land use. Although the approach adopted could be improved, the proposed trip rates present a worst case scenario and can therefore be considered robust.

Public transport

87 It is welcomed that a new station is proposed at this location and this will improve access to public transport with better facilities and improved gateline and ticket hall capacity. Furthermore, the Northwood area does not currently benefit from step free access to any station and therefore it is welcomed that step free will be delivered as part of the new station in line with London Plan Policy 6.1.

88 New bus stops are proposed on Green Lane and Central Way and TfL is satisfied with these arrangements however the enforcement of any stopping and waiting restrictions is critical to the success of this location as an interchange which reiterates the importance of the previously mentioned car parking management plan.

89 The existing bus stand located on site will be lost and therefore the applicant proposes that the area allocated for rail replacement buses could be used to accommodate standing facilities. TfL welcomes further discussion with the applicant on how this would be managed as buses undertaking reversing manoeuvres should be avoided.

90 Nevertheless it is welcomed that the residential and retail development can be accommodated on the local underground and bus network.

Kiss and ride / taxi and private hire

91 A pick-up and drop-off area located on the western edge of Central Way that can accommodate up to five large cars is proposed. Taxis will be limited to no more than two and will be required to store within the car park circulation and then called up by the taxi kiosk when a fare is ready to be collected at the pick-up/drop-off.

92 Pick-up and drop-off activity will be prohibited within this area between 10am and 3pm to allow for refuse collection and servicing activities to be undertaken. During this time pick-up and drop-off will occur within the basement.

93 A taxi rank in addition to a kiss and ride facility would be preferable however it is understood that space constraints means that this may not be possible. On that basis the management of the facility is important to ensure that vehicles do not queue on Central Way while waiting for a space. More detail on how this area would operate in tandem with the basement should be outlined within the car parking management plan referred to previously.

Cycling

94 The applicant should consider the feasibility of introducing traffic calming features along Central Way to assist in lowering the speeds of vehicular traffic and improving cycling priority. More discussion would be welcomed as any impact on bus performance and reliability would need to be understood.

Highway impact and access arrangements

95 The site will be accessed by all vehicles via Central Way which will form an arm of a proposed signalised staggered crossroads junction. Local highway modelling has been undertaken which indicates that the junction will mitigate the additional traffic attributed to the proposed development. It is nevertheless noted that the junction will continue to operate close to capacity and further work will be required at the detailed design stage.

Freight

96 Any vehicles undertaking a refuse collection or any delivery and servicing activity for the townhouses will use the southern section of Central Way. For the apartments or retail the facility located on Central Way previously referred to will be used. A framework delivery and servicing plan (DSP) has been provided and it is considered that the content is acceptable. The final document should be secured by condition to be discharged in consultation with TfL.

97 A framework construction logistics plan has been submitted and it is also considered that the principles contained within are acceptable. The final document should be secured by condition to be discharged in consultation with TfL.

Travel planning

98 A framework travel plan has been provided which is welcomed however before it can be considered to be fully acceptable it should include a baseline modal split, year 1, year 3 and year 5 targets, and detail on how it will be secured. Both a residential and workplace travel plan should be secured within the section 106 agreement.

CIL

99 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the borough of Hillingdon is £35 per square metre.

Summary

100 The applicant should provide origin data of those who use the public car park, provide the full quantum of commercial cycle parking and shower and changing facilities, discuss further with TfL how bus standing facilities can be accommodated on site, explore the feasibility of introducing measures along Central Way to improve conditions for cyclists and finally planning conditions are required to secure a car parking management plan, DSP and CLP with both a residential and workplace travel plan secured by section 106 agreement.

Local planning authority's position

101 Officers at the Council are generally supportive of the application, subject to the resolution of some planning issues.

Legal considerations

102 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.

103 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

104 There are no financial considerations at this stage.

Conclusion

105 London Plan policies on the principle of development, urban design and inclusive design, climate change and transport are relevant to this application. Whilst the application is generally supported in principle, however there remains some outstanding strategic planning issues. Further discussion is therefore required regarding the following issues:

- **Housing and affordable housing:** It is also not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12. The Council should confirm that the proposed tenure mix and rent levels meet an identified need in the borough. The provision of family sized affordable homes should be maximised. A condition should secure the M4(2) and M4(3) requirements. The applicant's proposal does not currently meet the Mayor's play policy requirements.
- **Design:** The proposals do not meet Part M of the Building Regulations as four residential units do not provide level access.
- **Climate change adaptation:** The proposed biodiverse roofs should be secured by condition.
- **Transport:** The applicant should provide origin data of those who use the public car park, provide the full quantum of commercial cycle parking and shower and changing facilities, discuss further with TfL how bus standing facilities can be accommodated on site, explore the feasibility of introducing measures along Central Way to improve conditions for cyclists and finally planning conditions are required to secure a car parking management plan, DSP and CLP with both a residential and workplace travel plan secured by section 106 agreement.

For further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Hermine Sanson, Senior Strategic Planner

020 7983 4290 email hermine.sanson@london.gov.uk
