

**HARROW COUNCIL**

**ADDENDUM**

**PLANNING COMMITTEE**

**DATE: 21<sup>st</sup> February 2018**

<b>1/01</b>	<p><b>Note:</b> Addendum Items 1, 2 have been updated since December 2017 Committee to reflect responses from Hillingdon Council, the GLA and updated planning policy comments and Addendum Item 15 consists of conditions recommended by planning policy officers in relation to the proposed district heat network. The other addendum items are unchanged from December 2017 Committee report.</p> <p><b>Addendum Item 1: Updated Planning Policy Response</b></p> <p><i>Principle of Development</i></p> <p>The proposal relates to the redevelopment of part of the existing central depot site, Wealdstone.</p> <p>The application site is part of the broader depot site that is safeguarded for waste purposes under the West London Waste Plan (WLWP). The Waste Plan is a statutory requirement under the London Plan and essentially demonstrates how the West London Waste Authority (WLWA) will allocate sufficient capacity to deal with the combined waste apportionment targets for member boroughs under the London Plan.</p> <p>The Waste Plan identifies the entire Central Depot site in Table 5.1: Existing waste sites considered to have <i>potential</i> for redevelopment. ‘Redevelopment’ in this instance means changing existing waste management arrangements such that an increase in the site’s recovery capacity is achieved. Table 5.1 indicates for the Depot site:</p> <ul style="list-style-type: none"> <li>a. Area: 2.31 ha (total site is identified as safeguarded)</li> <li>b. Potential contribution to waste apportionment: 150,150 tonnes per annum (tpa) (based on 65,000 t/ha)</li> <li>c. Existing contribution (i.e. the current Civic Amenity site): 25,780 tpa</li> <li>d. Potential additional contribution (i.e. difference between potential and existing): 124,370 tpa</li> </ul> <p>The most relevant policy in the Waste Plan to the assessment of the proposed redevelopment of the existing depot facilities is <i>Policy WLWP2 – Safeguarding and Protection of Existing and Allocated Waste Sites</i>. This policy has a number of elements to it. Firstly, land accommodating <i>existing waste management uses</i> in</p>
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West London will be protected for continued use for waste management. Existing waste management uses in this instance refers to the Civic Amenity Site in the western part of the site (as identified in Appendix 2 of the Plan and cross-referenced to in the policy). Secondly, the policy indicates that 'existing sites which have been allocated as having the potential for capacity expansion by redevelopment (Table 5-1) and new sites with potential for development for waste management facilities (Table 5-2) are also be safeguarded; this refers to the entire Depot site.

The third part of the policy relates specifically to how development applications will be assessed. It indicates that 'to ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste for which the site is currently permitted to manage, or that the management of the waste is being moved up the waste hierarchy'. Existing waste management sites refers to the Civic Amenity Site in the western part of the site and not subject to the re-development and therefore existing capacity (not potential capacity) of the site is not impacted upon. The final part of the policy indicates that 'development for non-waste uses will only be considered on land in existing waste management use, or land allocated in Table 5-2 if compensatory and equal provision of capacity for waste, in scale and quality, is made elsewhere within the West London Boroughs'. The subject site is currently used as depot, so not for existing waste use (Appendix 2), nor is it listed in Table 5-2: Additional sites with opportunity for developing waste facilities.

The Waste Plan identified a total existing waste management capacity of 1,636,000 tonnes per annum. The London Plan 2011 waste apportionment targets for the West London boroughs for 2031 is 2,250,000 tonnes per annum, resulting in the need for 614,000 tonnes per annum additional capacity. The Waste Plan identifies sites with potential additional capacity of 816,920 tonnes per annum, exceeding the required capacity. This element of over-allocation (i.e. more land / capacity identified than required) provides an element of flexibility, noting that not all sites identified as having potential future capacity may come forward for waste purposes. This is reflected in the report by the Planning Inspector that examined the draft Waste Plan, who recognised (at paragraph 65) the need to have a degree of flexibility, as all sites may not be developed as envisaged or indeed at all.

The draft London Plan 2017 includes new apportionment targets for London Boroughs, which requires that the boroughs comprising the West London Waste Authority to identify capacity for 2,223,000 tonnes per annum for 2041. This figure is comparable to the 2,250,000 tonnes in the London Plan 2011, but with a longer time horizon (to 2041 rather than 2031). Based on identified sites / capacity within the Waste Plan, the over-allocation against the draft London Plan 2017 targets is 229,920 tonnes per annum.

Whilst the Depot site is allocated in the Waste Plan and identified as 'suitable and available for development' for waste purposes, the availability of the full extent of the site is dependent on finding alternative locations for the existing depot functions, or consolidating depot functions on the existing site. This issue is reflected in key documents relevant to the Waste Plan, including the *Site Selection and Assessment Process – Summary Report* (bpp consulting, 2014) which indicates (paragraph 59) that the depot site was 'partially available', noting

that redevelopment of the site for additional waste capacity may require the relocation of the existing depot. It is noted that the Harrow depot site was one of four such 'partially available' sites identified and the only one taken forward to be allocated, suggesting it is the only allocated site in the Waste Plan where actual outcomes of any redevelopment is likely to be less than implied by the allocation.

In terms of the extent of the allocated Harrow site that may be available for additional waste capacity, it is considered that there is no feasible alternative location within the borough for the depot. This is reflected through Harrow's own Local Plan, which allocates the depot site (through the Harrow and Wealdstone AAP) for both depot and waste purposes. The supporting text to Policy AAP21: Harrow Waste Management Site recognises the Council does not currently own any other industrial sites within Harrow upon which to relocate all or part of the existing depot site functions. This position has been reaffirmed through more recent work undertaken by Corporate Estates and broader West London investigations (West London Alliance Property and Asset Management Programme). It is also considered consistent with the 'Allocated Sites – Position Statements on Practicalities of Reorientation' submitted by the West London boroughs during the examination of the draft Waste Plan which re-enforced the view that the site would be redeveloped for intensified / expanded waste functions and consolidated / intensified depot functions. The proposed redevelopment facilitates the intensification of the use of the site for depot purposes, in that it replaces a collection of low-rise buildings inefficiently laid-out on the site with a purpose built building of up to three storeys.

It should be noted that the application does not cover the entire site allocated under the Waste Plan and therefore there would remain scope for future expansion of waste capacity on the site, which is estimated (based on area alone) to enable the potential doubling of the existing waste throughput on the site.

Given the above, it is considered that the proposed development is consistent with the West London Waste Plan and the Harrow Local Plan (specifically the Civic Amenity and Council depot site allocation), both which recognised that the availability of the entire allocated site for waste purposes would be dependent on the relocation or consolidation of the existing depot on the site. It is Planning Policy's view that there are no alternative sufficiently large sites within the borough that are available to relocate the depot to. The Waste Plan over-allocated land, recognising that some sites may not come forward as envisaged, if at all. The draft London Plan 2017 does not significantly change the degree of over-allocation. Whilst the proportion of London's overall waste apportioned to West London has increased in percentage terms, the actual tonnage per annum remains similar. It is therefore not considered necessary to await a review of the Waste Plan (minimum 3-4 years).

The above comments are considered to address the points raised by Hillingdon relating to over-allocation, the draft London Plan 2017, alternative sites for the depot and whether or not a review of the Waste Plan is required to facilitate the development (as such an eventuality was consistently envisaged as being a potential throughout the preparation of the plan and the examination into it). The existing depot facilities are in poor condition and the proposal simply seeks to re-provide these to a modern and more efficient standard. The depot functions support a range of Council activities / infrastructure, including waste collection and transport (for Harrow and two other boroughs). As such, it is an essential piece of

infrastructure that would need to be either retained on-site or provided elsewhere and in this regard, there are no alternative sites. Part of the site remains available for future additional waste uses and the entire site remains within Council ownership.

The six London boroughs / Mayoral Development Corporates that jointly prepared the Waste Plan with Harrow were consulted on the application, with Hillingdon being the only borough to object. The application was also referred to the Mayor and the Mayor did not raise any objection, noting that 'GLA officers are satisfied that these proposals do not prejudice the capacity and throughput targets outlined within this cross borough plan. Any potential increase in throughput at the site has always been understood to be dependent upon the depot functions of the site being able to relocate to an alternative site. The Council has explored this and found that there are no suitable alternative sites available. The principle of the proposed use therefore accords with the policies outlined above.'

### *District Heating*

The applicant has provided an energy strategy to support the application and to address the relevant policies in the London Plan and the Harrow Local Plan. The proposal achieves the overall non-residential carbon reduction targets under the London Plan. However, the energy strategy fails to fully consider the potential of the site to connect to a future district heating network. In this regard, the Council has been progressing feasibility work on a district heat network serving the main Council Regeneration sites in Wealdstone, as well as major private sector development (i.e. the Origin Housing scheme at Palmerston Road). The technical feasibility work (and associated techno-economic model) indicates that the scheme is technically and financially feasible and an Outline Business Case is currently being prepared. The proposed network would be capable of serving the proposed depot site, noting that the business case will be predicated on supplying heat at a lower cost than the 'counter-factual' / business-as-usual' scenario for each development connected to the network. As the potential network would supply low-carbon heat to the development, it is likely that the renewable energy technology (solar PV panels) proposed to be installed on the depot building would not be necessary to meet the London Plan carbon reduction targets.

Given the above, the energy strategy submitted with the application needs to be updated to reflect the potential district heating network and to provide details as to how the connection to the future network can be safeguarded. Two conditions to this effect should be attached to any planning permission granted.

### **Proposed Conditions**

#### *Revised Energy Statement*

The development hereby approved shall not commence until an updated energy strategy should be submitted to and approved by the local planning authority. The energy strategy should address the energy hierarchy and carbon emissions targets in the London Plan and take into account the potential to connect the development to a district heating network serving the Wealdstone area.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the proposed development follows the energy hierarchy outlined in the London Plan and Harrow Local Plan and in order to comply with London Plan 2015 Policies 5.2 (Minimising carbon dioxide emissions), 5.5 (Decentralised energy networks) and 5.6 (Decentralised energy in development proposals), draft London Plan 2017 policies SI2 (Minimising greenhouse gas emissions) and SI3 (Energy infrastructure), and Harrow and Wealdstone Area Action Plan Policy AAP10: Harrow & Wealdstone District Energy Network.

*District Heat Network*

The development hereby approved shall not commence until a detailed strategy has been submitted and approved in writing by the local planning authority, demonstrating that the plant room/s within the development have been designed with sufficient space, appropriately located break-through / penetration points in the building fabric and agreed safeguarded route for infrastructure to the Forward Drive boundary of the site to ensure that it is technically feasible to connect the development to any future adjacent or nearby district energy network. The strategy should include details that ensure the design of the heating system is compatible with any proposed or planned district energy networks.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the proposed development allows for connection to any district energy network serving the site and in order to comply with London Plan 2015 Policies 5.2 (Minimising carbon dioxide emissions), 5.5 (Decentralised energy networks) and 5.6 (Decentralised energy in development proposals), draft London Plan 2017 policies SI2 (Minimising greenhouse gas emissions) and SI3 (Energy infrastructure), and Harrow and Wealdstone Area Action Plan Policy AAP10: Harrow & Wealdstone District Energy Network.

**Addendum Item 2:**

**Principle of Development**

Paragraph 6.2.4:

While the WLWA and other local authorities did not object to the proposal a response was received from Hillingdon Council. Hillingdon disagree with the findings in the submitted Planning Statement summarised on page 93 that the loss of the Depot Site is not significant in terms of the WLWP. In response to this a rebuttal of Hillingdon’s objection was supplied by the applicant. For ease of reference these are shown in the table below:

Hillingdon Comment	Applicant Response
They do not believe that there is a significant oversupply of waste locations to warrant departure from the plan, as the loss of just one allocation could lead to the plan falling below the required apportionment.	The Depot Site will still have the capacity to meet the waste management act requirements within the existing recycling area. The applicant’s redevelopment does not encompass the Depot Site.

<p>The Council Depot is the third largest of these allocations and its loss would reduce the potential additional contribution by 15%.</p>		
<p>The response also states that the latest Draft London Plan (2017) proposes to alter this position. This would decrease the overall projected tonnage of Household and Commercial and Industrial waste to be managed London-wide, the share to be apportioned to the six West London Boroughs has risen considerably.</p> <p>The response goes on to state that if capacity is based on new requirements outlined after the production of the WLWP they should include a full revaluation of the existing capacity.</p> <p>Overall Hillingdon state that the application does not sufficiently demonstrate what work has been undertaken since the adoption of the WLWP to find an alternative site for the depot's current functions/ consolidation of the existing use and whether the site should be excluded from the WLWP the plan projects to the year 2031.</p>	<p>The unavailability of the site was clearly identified throughout the preparation of the Harrow and Wealdstone AAP and WLWP. It was identified that it may require relocation of the existing depot. It is noted in the Site Assessment that the Depot site may not become available for additional waste management if the existing Depot facilities could not be relocated. It is considered that the site selection report presented to Harrow Council's Cabinet in April 2017 addressed these issues satisfactorily.</p> <p>Furthermore, the same Report to Cabinet clarified that the proposal does seek to consolidate and intensify the existing depot improved efficiency, etc.</p>	
<p>In light of the response from Hillingdon Council and the final GLA response, also in relation to the District Heat Network, the policy response is updated as follows:</p> <p>The West London Waste Authority (WLWA) are responsible for providing facilities and for receiving waste collected by the six West London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames and is primarily funded by a levy paid by the six boroughs. The WLWA have responded to state that they do <i>not</i> object to the current proposal. Harrow Council Planning Policy Team Leader has also responded to state they have no objection and that in effect that the scheme is policy compliant.</p> <p>Subsequent to the previous Committee meeting, an objection from Hillingdon Council was received, which has been included in the updated Committee Report.</p> <p>The Policy response acknowledges the West London Waste Plan Policy WLWP2 'Safeguarding and Protection of Existing and Allocated Waste Sites'. The Waste Plan identifies the entire Central Depot in Table 5.1: Existing waste sites considered to have potential for redevelopment. 'Redevelopment' in this instance means changing existing waste management arrangements such that an increase in the site's recovery capacity is achieved.</p> <p>Four main points are raised in the policy response:</p> <p>Firstly the existing waste management use, which refers to the Civic Amenity Site in the western part of the site must be protected for waste management.</p>		

Secondly, the entire Depot site is indicated in Table 5-1, which are sites indicated as 'existing sites which have been allocated as having potential capacity for expansion by redevelopment are to be safeguarded'. This could be interpreted to indicate that there can be no other development on the entire depot site, to ensure its potential for waste management use is safeguarded.

*However*, the third part of the policy relates specifically to how development applications are assessed. It indicates that redevelopment of any existing waste management sites must ensure that the quantity of waste is equal to or greater than the quantity of waste which the site is currently permitted to manage. The 'existing' refers to the western part of the site. This existing capacity would *not* be harmed or reduced by the current proposal.

Finally, the policy states that 'development for non-waste uses will only be considered on land in existing waste management use, or land allocated in Table 5-2 if compensatory and equal provision is made elsewhere. The current application site is not listed in Table 5-2 and is not for existing waste use.

On this basis, whilst the overall Central Depot site is 'safeguarded' for waste purposes, the application of the policy to this specific proposal indicates there is not a conflict

Other considerations are also highlighted: The existing depot is in need of upgrading and modernisation. The depot functions support essential Council activities, including waste collection and transport. It is an essential piece of infrastructure that needs to be provided on this site or elsewhere. Also, the site and nature of the depot functions means that there are limited alternative sites for the depot. This is highlighted in Area Action Plan Policy 'AAP 21: Harrow Waste Management Site' which specifically states that the site is allocated partly for depot functions. It is acknowledged in this policy part A.a that proposals for intensification of existing waste management activity/new waste facilities would require provision to relocate the existing depot elsewhere or to consolidate existing depot functions. The supporting text to this policy paragraph 4.162 states that the Council's Depot functions will still be required over the life of the Plan and the Council does not currently own any other industrial sites to relocate the depot and it is considered that there is no feasible alternative location within the borough for the depot. This is highlighted in AAP 21.

Furthermore, the Waste Plan identifies a surplus between the potential additional contribution of the allocated sites (Tables 5-1 and 5-2) (816,920 tpa) and that required to meet London Plan apportionment (614,000 tpa). So conceivably, even if the Depot site was developed, the WLWA could still meet its requirements.

In regard to the draft London Plan 2017 new apportionment targets for London boroughs, identify 2,223,000 tons per year for 2041, which is comparable to the 2,250,000 in the London Plan 2011 but with a longer time period to 2041 rather than 2031. Based on identified sites/capacity within the Waste Plan, the over-allocation against the draft London Plan 2017 targets is 229,920 tonnes per annum.

In this regard, this issue of how practical it is to prevent any redevelopment of the depot in order to safeguard the *entire* site for potential future uses which may not

take place. This needs to be balanced against the essential infrastructure nature of the depot discussed above and also the fact that the scheme would only affect part of the site.

These updated planning policy comments were made in light of the response from Hillingdon Council objecting to the scheme and these comments are considered to address the concerns raised by Hillingdon Council. The updated policy comments are also made in light of the GLA response, stating that the Mayor did not raise any objection and that GLA officers believe the proposal would not prejudice waste targets and that the issue of creating an improved depot on the existing site is acceptable. GLA Officers have supported the scheme subject to conditions related to materials, transport and sustainable development. These issues have been addressed via planning conditions. On this basis, it is considered that the scheme would on balance be overall compliant with policy and the Local Plan.

### **District Heat Network**

The applicant has provided an energy strategy to support the application. Planning policy officers consider that the existing strategy does not fully consider the potential of connecting the site to a future district heating network, which is planned for this area. The heat network would assist in meeting London Plan carbon reduction targets.

As a result, policy officers consider a revised energy strategy should be submitted to reflect this issue and two conditions have been recommended in relation to this which will be attached to this report.

### **Addendum Item 3:**

#### **Mezzanine- correction to paragraph 2.4 in 'Proposal' section**

The scheme does include a part mezzanine level at first floor level within the workspace on the southern part of the site.

### **Addendum Item 4:**

#### **Neighbour objections- Paragraph 4.2**

A neighbour objection from an occupier located within 'The Hollies' on Christchurch Avenue, stating that the 3 storey building would block sunlight to their flat. This has been addressed in the main body of the report in the 'Neighbouring Amenity' section.

### **Addendum Item 5:**

#### **Amended Flood Risk Assessment and Engineering Drainage section response, paragraph 6.35**

An amended Flood Risk Assessment has been submitted. The response from the Engineering section states that the updated FRA Revision G is satisfactory and there is no objection to the proposed development. On this basis, a condition will be attached to ensure that the scheme is undertaken and retained in accordance with this document.



**Addendum Item 6:**

**Drainage Conditions**

1. The development hereby permitted shall be undertaken in accordance with the approved Flood Risk Assessment Ref 1015124-RPT-CL-0001 Revision G dated 01 December 2017 and shall thereafter be retained in that form.  
Reason: To ensure that adequate and sustainable drainage facilities are provided, and to prevent any increased risk of flooding.
2. The development hereby permitted shall not commence until a scheme for works for the disposal of surface water, surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be completed in accordance with the approved details and shall thereafter be retained.  
REASON: To ensure that adequate drainage facilities are provided. Details are required PRE-COMMENCEMENT as the condition would be unenforceable after this time.

**Addendum Item 7:**

**Revised Plan Number for Flood Risk Assessment**

Flood Risk Assessment Ref 1015124-RPT-CL-0001 Revision B dated 11 October 2017 to be replaced with Flood Risk Assessment Ref 1015124-RPT-CL-0001 Revision G dated 01 December 2017.

**Addendum Item 8:**

**Revised response from Environmental Health Officers:**

Noise

I consider the proposed night time noise emission limit for plant etc. is too low, as it exceeds several of the lowest night time background noise levels. I have no objection to the proposed daytime limit.

The noise report only refers to plant noise emission limits. Further information is required to identify other potential noise sources, such as traffic because of changed layout and also introduction of a multi-storey car park (possible high level noise)

Air Quality

The air quality report is satisfactory.

Dust Management

It should be noted that a dust management plan will be required, which cross-references the risk analysis and mitigation measures recommended in the air quality report. Such a dust management plan is often incorporated in a general construction management plan.

Lighting

I could not see any lighting strategy, although I assume there will be external lighting. If this is indeed the case, then we need a "lighting strategy" report produced by a competent professional which should state and demonstrate that the lighting design is in accordance with the guidance notes "Guidance Notes for the Reduction of Obtrusive Light GN01:2011" recommended by the IPL (Institute

of Lighting Professionals) for the reduction of obtrusive light, to avoid nuisance and loss of amenity. This should include identification of appropriate “environmental zoning”, and that lighting meets the relevant standards for “source intensity” (glare), “vertical illuminance” and “Upward Light Ratio” set out in the guidance. Such a lighting strategy report should mean that no significant nuisance will be caused.

Please note a different type of report may be required for other planning purposes, but Environmental Health require this particular type of lighting strategy to be able to comment on possible nuisance.’

**Addendum Item 9:**

**Amendment to paragraph 6.24 Air Quality Assessment**

Comments have been received from Environmental Health Officers that a dust management plan will be required. As suggested in the EHO comment this has been incorporated in to a general construction management plan and so no further action is required.

**Addendum Item 10:**

**Amendment to paragraph 6.25 ‘Noise’**

Based on the comments from Environmental Health Officers (EHO), it is considered that the submitted Noise Report does not meet requirements for night time noise emission limit for plant and also does not refer to other noise sources. On this basis, after discussion with EHO, a condition will be attached to ensure a revised Noise Assessment be submitted and approved in writing by the Local Planning Authority.

**Addendum Item 11:**

**Noise Condition**

Existing Noise Condition will be replaced with the following:

Notwithstanding the details within the submitted Noise Report Reference 1015124-RPT-AS-0001 dated 09 October 2017, the development hereby permitted shall not be occupied until a revised Noise Report containing, but not limited to:

- a. Revised night time noise emission limit;
- b. Noise emission from sources other than plant

is submitted and approved in writing by, the local planning authority. The scheme shall be carried out in accordance with the approved details.

REASON: To ensure that adequate precautions are taken to avoid noise nuisance and to safeguard the amenity of neighbouring residents.

**Addendum Item 12:**

**New paragraph 6.25 ‘Lighting’**

Based on the comments from Environmental Health Officers (EHO), it is considered that a lighting strategy report would be required. On this basis, after discussion with EHO, a condition will be attached to ensure a lighting strategy report be submitted and approved in writing by the Local Planning Authority.

**Addendum Item 13:**

**Lighting Condition**

The development hereby permitted shall not be occupied until a Lighting Strategy report produced by a competent professional in accordance with “Guidance Notes for the Reduction of Obtrusive Light GN01:2011” recommended by the IPL (Institute of Lighting Professionals) for the reduction of obtrusive light, to avoid nuisance and loss of amenity has been submitted to, and approved in writing by, the local planning authority.

This report should include:

- a. identification of appropriate “environmental zoning”,
- b. demonstration that lighting meets the relevant standards for “source intensity” (glare), “vertical illuminance” and
- c. “Upward Light Ratio” set out in the guidance.

The development shall be carried out in accordance with the approved details and shall thereafter be retained in that form.

REASON: To ensure that adequate precautions are taken to avoid light nuisance and to safeguard the amenity of neighbouring residents.

**Addendum Item 14:**

**Cycle Parking condition to be replaced with the following:**

Notwithstanding the approved plans, prior to occupation of the development hereby approved safe and secure cycle and motorcycle storage, in accordance with London Plan standards shall be implemented and shall thereafter be retained.

REASON: To provide sufficient bicycle and motorcycle parking space for the use of future occupiers.

**Addendum Item 15**

**Conditions- Energy Statement and District Heat Network:**

*Revised Energy Statement*

The development hereby approved shall not commence until an updated energy strategy should be submitted to and approved by the local planning authority. The energy strategy should address the energy hierarchy and carbon emissions targets in the London Plan and take into account the potential to connect the development to a district heating network serving the Wealdstone area.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the proposed development follows the energy hierarchy outlined in the London Plan and Harrow Local Plan and in order to comply with London Plan 2016 Policies 5.2 (Minimising carbon dioxide emissions), 5.5 (Decentralised energy networks) and 5.6 (Decentralised energy in development proposals), draft London Plan 2017 policies SI2 (Minimising greenhouse gas emissions) and SI3 (Energy infrastructure), and Harrow and Wealdstone Area Action Plan Policy AAP10: Harrow & Wealdstone District Energy Network.

	<p><i>District Heat Network</i></p> <p>The development hereby approved shall not commence until a detailed strategy has been submitted and approved in writing by the local planning authority, demonstrating that the plant room/s within the development have been designed with sufficient space, appropriately located break-through / penetration points in the building fabric and agreed safeguarded route for infrastructure to the Forward Drive boundary of the site to ensure that it is technically feasible to connect the development to any future adjacent or nearby district energy network. The strategy should include details that ensure the design of the heating system is compatible with any proposed or planned district energy networks.</p> <p>The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure that the proposed development allows for connection to any district energy network serving the site and in order to comply with London Plan 2016 Policies 5.2 (Minimising carbon dioxide emissions), 5.5 (Decentralised energy networks) and 5.6 (Decentralised energy in development proposals), draft London Plan 2017 policies SI2 (Minimising greenhouse gas emissions) and SI3 (Energy infrastructure), and Harrow and Wealdstone Area Action Plan Policy AAP10: Harrow &amp; Wealdstone District Energy Network.</p>
<p><b>1/02</b></p>	<p><b>AMEND</b> recommendation to delegate authority to <b>GRANT</b> planning permission subject to authority being delegated to the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Director of Legal and Governance Services for the completion of the Shadow Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions or the legal agreement, and as amended by the Addendum.</p> <p>Page 64 <b>REMOVE</b> reference to Condition 31 and <b>REPLACE</b> with Condition 26</p> <p>Page 67 under Statutory Return Type <b>DELETE</b> 'Large scale'</p> <p>Page 67 under GLA Community Infrastructure Levy <b>REPLACE</b> '£81,567.50' with '£73,230.50'.</p> <p>Page 67 under Local Cil requirement <b>REPLACE</b> '£265, 355.00' with '230,153.00'</p> <p>Page 70 under Cycle Parking <b>REMOVE</b> reference to 40 Proposed Cycle Parking Spaces and <b>REPLACE</b> with 42</p> <p>Page 71 paragraph 1.1 <b>REPLACE</b> 'Love lane to the west' with 'Love Lane to the east'</p> <p>Page 71 paragraph 1.7 <b>REPLACE</b> 'Located adjacent to the western boundary..' with 'Located adjacent to the eastern boundary..'</p> <p>Page 72 paragraph 2.10 <b>REPLACE</b> 'Three of these spaces' with 'Two of these spaces'</p>

Page 76 in the overdevelopment section in the officers comments box **REMOVE** *'As discussed within the body of the report, the proposal would introduce a maximum of persons to the application site.'*

Page 97 Paragraph 6.2.9 **REPLACE** *'The provision of private rental sector (PRS) housing'* with *'The provision of a mix of market housing'*

Page 97 Paragraph 6.3.3 **REMOVE** current text in the paragraph and **REPLACE** with; *'The proposed development would provide houses in a range of tenures. The proposed housing would constitute an increase in housing stock within the Borough in terms of unit numbers. In addition to the mix type and tenure of the proposed residential units, the development would provide family sized dwellinghouses. The proposal is therefore considered to respond to the needs of different demographic groups within the community, seeking social housing or rental accommodation. In this respect, the proposed development would meet the overarching Place principle of regeneration into the area.'*

Page 98 Paragraph 6.4.4 **REMOVE** existing text and **REPLACE** with *'The applicant has submitted a Viability Assessment in support of the proposal's affordable housing offer. The assessment indicates the maximum number of affordable units that can be viably supported by the scheme is 2 units. Due to the relatively high existing use value/benchmark land value of the car park and the abnormal build costs required to deliver the regeneration of the site, as well as the Councils stated objectives to deliver high quality buildings that assist broader regeneration and economic development, this application can only viably accommodate 10% affordable housing'*.

Page 98 **ADD** new paragraphs (in relation to the update on financial viability of the scheme)

*'The Council's independent consultant has reviewed the scheme and considered that the proposed development could potentially deliver a surplus of approximately £1.31million. Accordingly, it has been agreed that a cash contribution should be paid in addition to the 2 affordable units. The trigger point for this payment will follow a Financial Viability Review Mechanism.*

*This would measure the actual viability of the development, on an open-book basis, in accordance with an agreed process that would be secured by planning condition. It would determine whether a financial contribution should be made towards off-site affordable housing provision in the context of the actual viability of the development and if so, what that should be and when and how it should be made.*

*The Council's independent consultant has confirmed that the financial viability review mechanism would be satisfactory in securing any potential uplift from scheme that could be used in terms of affordable housing contributions. Details of the wording of such a review would be subject to the agreement between the Council's Regeneration and Housing departments.'*

Page 99 Paragraph 6.4.14 **REMOVE** this paragraph from the report

Page 99 Paragraph 6.4.15 **REMOVE** the following sentence *'It is the intention of*

*the applicant to build out part of the proposed scheme as part of its 'Build to Rent' programme'*

Page 99 Paragraph 6.4.16 **REMOVE** this paragraph from the report

Page 100 Paragraph 6.4.19 **REMOVE** this paragraph from the report

Pages 99 and 100 the paragraphs have incorrectly numbered paragraphs 6.4.11 on page 99 to paragraph 6.4.19 on page 100 should be **RENUMBERED** 6.4.6 to 6.4.14.

Page 100 paragraph 6.5.2 **REMOVE** reference to page 69 and **REPLACE** with page 22.

Page 101 paragraph 6.5.9 after amenity areas, **DELETE** 'which' and **ADD** 'the open plan nature of the ground floor of the units would'

Page 116, condition 3 **REPLACE** 'at least one' with 'Unit 1'

Page 117 condition 4 **REPLACE** 'a minimum of 2 of the units' with 'Units 1 and 7'

Page 121 condition 16 **REPLACE** 'the development hereby permitted, shall be undertaken in accordance with...' with 'The development hereby permitted, in so far it relates to measures to protect trees shown to be retained on the Landscaping Strategy required by condition 12 during construction shall be undertaken in accordance...'

Page 122 condition 18 **REMOVE** 'the development hereby approved shall not progress beyond basement level' and **replace** with 'No development shall take place'

In addition to the alterations above add at the end of the reason 'This is a **PRE-COMMENCEMENT CONDITION**'

Page 122 **DELETE** condition 19 in relation to communal facilities

Page 123 **DELETE** second Condition 20 in relation to Rooftop Amenity Space

Page 124 condition 23 fifth line down **REMOVE** the words 'buildings and'

Page 125 condition 26 the date in the fifth line down should be **REMOVED** and **REPLACED** with '21/02/2018'

Page 125 **ADD** the following condition;

**'Restrict Permitted Development Rights'**\*

*Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking or re-enacting that order with or without modification), no development which would otherwise fall within Classes A, B, C, D, E and F in Part 1 of Schedule 2 to that Order shall be carried out in relation to the dwellinghouses hereby permitted without the prior written permission of the local planning authority.*

*REASON: To safeguard the character of the area by restricting the amount of site coverage and size of dwelling in relation to the size of the plot and availability of amenity space and to safeguard the amenity of neighbouring residents'*

Page 125

**ADD** the following condition;

*'Financial Viability Review Mechanism\*\**

*No development shall commence at the site before an Affordable Housing Scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The Affordable Housing Scheme shall include:*

- 1. The location and tenure of a minimum of two affordable homes at the site (one for affordable rent and one in an intermediate tenure) including details of how they would be provided at the site; and*
- 2. Details of a Financial Viability Review Mechanism (FVRM). The FVRM shall set out the process whereby a fully open book approach to all development costs and values respectively incurred and received (or projected to be incurred or received) by the developer will be adopted in order to determine whether a financial contribution towards off-site affordable housing provision should and can be made and if a contribution should and can be made, what that contribution should be or if further affordable housing is able to be provided at the site and if it can and should, what form that should take; and*
- 3. Details of how any financial contribution or affordable housing identified as being required through the FVRM will be either provided as additional affordable housing units on site or provided by way of a commuted sum to provide affordable housing off-site.*

*The development shall be carried out in accordance with the approved Affordable Housing Scheme, and any financial contribution or further on-site affordable housing identified as being required as a result of the FVRM shall be paid or provided as additional affordable housing on-site, unless otherwise agreed in writing by the Local Planning Authority.*

Page 125 **ADD** the following condition;

*'Carbon Off-Set Financial Contribution\*\**

*Notwithstanding the details contained within the Energy & Sustainability assessment, a carbon-offset contribution of £46,584.00 shall be paid to the relevant department of the Council prior to the commencement of the development. Should the final energy calculations submitted to the Council demonstrate that the carbon emissions from the residential element of the scheme exceeds 25.88 tonnes per annum, an additional carbon-offset contribution shall be paid to the Council at a rate of £1,800 per tonne of carbon in excess of 25.88 tonnes emitted from the scheme.*

*Reason: To ensure compliance with Policy 5.2 of the London Plan (2016) in terms of minimising carbon dioxide emissions.'*

Page 125 **ADD** the following condition:

*'Glazing – Obscured\**

*'The windows in the first floor north flank elevations of the proposed units 1 and 20 shall: (a) be of purpose made obscure glass, (b) be permanently fixed closed*

	<p><i>below a height of 1.7m above finished floor level, and shall thereafter be retained in that form.</i></p> <p><i>REASON: To safeguard the amenity of neighbouring residents in accordance with policy DM1 of the Development Management Policies Local Plan 2013.'</i></p> <p>Page 127 Informative 8 (Mayoral Cil)  <b>REMOVE</b> '£81,567.50' and <b>REPLACE</b> with '£73,230.50'</p> <p>Page 127 Informative 9 (Harrow Cil)  <b>REMOVE</b> '£256,355.00' and <b>REPLACE</b> with '£230,153.00'</p>
2/02	<p><b><u>Addendum Item 1:</u></b>  <b>ADD</b> the following 4 objections to section 4.3 and 4.4:</p> <p><u>48 The Avenue:</u></p> <ul style="list-style-type: none"> <li>• The proposal is a characterless square block lacking character or design, unlike other buildings Shanly Homes built; and;</li> <li>• The proposal should seek to respect the majority of the character of the road and not add to the out-dated character designed buildings.</li> </ul> <p><u>56 The Avenue:</u></p> <ul style="list-style-type: none"> <li>• The design of the building is not in keeping with the other homes on The Avenue. Other new developments on the road have been sympathetic to the existing properties.</li> </ul> <p><u>64 The Avenue:</u></p> <ul style="list-style-type: none"> <li>• Strong objection to the design of the proposal: The proposed design is not in keeping with the design and character of the vast majority of houses in the Avenue.</li> </ul> <p><u>65 The Avenue:</u></p> <ul style="list-style-type: none"> <li>• The proposed application lacks design quality and character and imitates the poorest examples of design already present on The Avenue;</li> <li>• The design of the proposal will have a visual impact on the streetscene and would set a precedent for other developers; and,</li> <li>• Concerns regarding the lack of parking.</li> </ul> <p><u>Response to Objections:</u>  Concerns relating to design and character are acknowledged and have been discussed within section 6.5 of the Officer's Report.</p> <p>Concerns regarding car parking are acknowledged. However, as discussed within section 6.8 of the Officer's Report, 9 parking spaces would be provided on-site (ratio of 1:1), to the front and rear of the proposed building.</p>



## Agenda Item 9 - Representations on Planning Applications

<b>1/02</b>	Waxwell Lane Car Park – P/5680/17	<b>Objector:</b> Mr. Kirill Kirilenko, Resident <b>Applicant:</b> Mr Chris Lloyd, Planning consultant
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