

HARROW COUNCIL

ADDENDUM

PLANNING COMMITTEE

DATE : 23rd January 2019

1/01	<p><u>Addendum Item 1:</u></p> <p>Correction of floorspace:</p> <ul style="list-style-type: none"> • Net Additional Floor space including parking: 13,548 sqm <p><u>Addendum Item 2:</u></p> <p>CIL Calculations:</p> <p>GLA Community Infrastructure (CIL) Contribution (provisional): £693,172.85 Harrow Community Infrastructure (CIL) Contribution (provisional): 0</p> <p><u>Addendum Item 3:</u></p> <p>GLA Consultation Response update</p> <p><i>Principle of development</i></p> <p>The site is allocated as a suitable waste site within the West London Waste Plan and as such is afforded significant protection for waste uses. The wider site allocation currently processes a waste capacity of 25,780 tonnes per annum. This would remain unaltered as a result of these proposals.</p> <p>Previous discussions with GLA environment officers involved in the Joint West London Waste Plan had confirmed that redevelopment of the site for expanded Council depot uses would not prejudice the waste capacity and throughput targets outlined within this cross-borough plan. Any potential increase in throughput associated with the application site has always been understood to be dependent upon the depot functions of the site being able to relocate to an alternative site. As with the consideration given to the recent extant permission on the site, the Council has explored the potential for relocation of the existing depot functions at the site, and adequately demonstrated that there are no suitable alternative sites available. The principle of the proposed use therefore accord with the policies outlined above and is supported.</p> <p>The site is within the Harrow and Wealdstone Opportunity Area, as such the development should respond to the Harrow and Wealdstone Area Action Plan objectives in accordance with London Plan Policy 2.13 and draft London Plan Policy SD1. The opportunity area has been identified to have an indicative capacity for 3,000</p>
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jobs and a minimum of 2,800 new homes. The redevelopment of the site and proposed industrial intensification is anticipated to have a positive contribution to the realisation of the employment targets outlined within the OAPF and is therefore supported. By comparison with the extant permission for the redevelopment of the site, the current scheme provides an additional uplift of 2,078 sq.m of (B1) office space, which will provide additional employment capacity within the scheme.

As with the previous scheme, the rationalisation, increased efficiency and improved standard of design across the site are all in accordance with the principles of the opportunity area framework and are supported.

As with the extant permission on the site, the proposed redevelopment and industrial intensification of this site would optimise the existing transport depot functions, whilst preserving the existing waste processing capacity of the wider waste site. As such the proposals accord with London Plan Policy 5.17, draft London Plan Policies SI8 and SI9 and the Harrow and Wealdstone Area Action Plan. A further uplift of rented office space aligns with the employment objectives of the Harrow and Wealdstone Opportunity Area, and is consistent with London Plan Policy 2.13 and draft London Plan Policy SD1. The principle of development is therefore supported.

Urban Design

By comparison with the extant permission, some additional building mass is proposed through the incorporation of an additional level of car parking and two additional levels of office space. The resulting additional mass does not significantly alter the appearance or design quality of the consented, and is acceptable in strategic planning terms.

The internal uses are separated by an external variance in the colour scheme. The office space is identifiable by the lighter shades of panelling which acts to contrast the darker shade of the warehouse units. The elevations benefit from a generous fenestration arrangement, details of which should be secured by way of condition.

As with the previous proposal, the consolidation of the Council's transport depot functions into one rationalised space will minimise the impact of the site on the neighbouring residential properties to the north. The uses have been orientated so that the noise generating industrial/workshop uses are concentrated to the south western portion of the building. This maximises the separation distance between the residential and industrial uses. The uses which generate less noise and disturbance front the northern and eastern edges of the development, in closer proximity to the residential properties situated on Cullington Close. This approach is supported in line with draft London Plan Policy D12 which seeks to ensure new development does not prejudice pre-existing noise-sensitive development.

As with the previously approved scheme, the proposed design, scale, internal configuration and layout do not present any strategic design concerns and the rationalisation of built form on the site is supported. The Council must secure key details of facing materials to ensure a high-quality building is delivered in accordance with London Plan Policies 7.1 and 7.4 and draft London Plan Policies D1 and D2.

Transport

The transport assessment (TA) provided for the extant permission has been re-used, and updated on-street parking occupancy, trip generation and junction modelling have

been provided for the enlarged scheme in this proposal. Notwithstanding this, there are inconsistencies identified in the submitted information with regards to the assessment and mitigation of transport impacts, car parking and healthy streets. In order to comply with Chapter 6 of the London Plan and policies T2, T4 and T6 of the draft London Plan, the TA and associated modelling must be amended to address the concerns raised under the following headings.

Further clarity is sought on the number of additional car parking spaces provided within the scheme and their associated purpose. The proposed level of parking is in excess of the standards expressed for an Opportunity Area within the draft London Plan, and a detailed Car Parking Management Plan (CPMP) must be submitted and secured by condition in order to evaluate the appropriate proportion of parking provided within the scheme. For the proposed additional car parking spaces, careful management should be adhered so as not to encourage car usage rather than the use of sustainable modes. In this regard the CPMP must give consideration to measures including either limiting the use of the multi-storey car park for council staff and vehicles only, and targeting a proportion of dual spaces for operational vehicles and cars (in use at different times), in order to reduce the overall amount of the site taken up by parking.

In accordance with Policy 6.13 of the London Plan and Policy T6 of the draft London Plan, further clarification is required in regard to the provision and location of the proposed three additional blue badge parking spaces proposed, as well as the provision of electric vehicle charging points (EVCPs). This should include provision relating to operational car parking as well as staff and visitor parking.

Cycle Parking

At present, the proposal does not state the quantity, location or quality/design of additional storage spaces that will be provided to match the uplift in B1 office provided over and above the extant permission. The existing depot operations at the site had 40 cycle parking spaces in two dedicated covered areas. Whilst there is no cycle parking standard for depot operations, to serve the existing and new operational staff who would be based at the site as well those working in the proposed new offices, cycle parking should be reviewed through an amended travel plan provided and secured by condition, to demonstrate that sufficient provision will be made to cater for demand and to support mode shift.

A servicing and construction management plan must be provided in order to ensure the safe and efficient delivery of the scheme.

Energy

The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified. Detailed comments have been forwarded to the applicant under separate cover in this regard.

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised.

An on-site reduction of 74 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the non-domestic buildings, equivalent to an overall saving of 35%. The carbon dioxide savings proposed meet the target set within Policy 5.2 of the London Plan.

Flood Risk

The proposed scheme does not alter the previous flood risk assessment given to the extant consent on the site (LPA Reference: P/4767/17, granted 22/02/2018). As with the previous scheme, the proposal is in accordance with London Plan Policy 5.12 and draft London Plan Policy SI12 which require applications to have sufficient regard to flood risk. The Council should secure details of the wider sustainable urban drainage strategy. It is acknowledged that a flood risk assessment has been submitted which proposes geo-cellular storage to achieve greenfield run-off rates; however, this is the minimum acceptable implementation of the drainage hierarchy outlined in London Plan Policy 5.13 and draft London Plan Policy SI13. As such, officers would encourage further measures to secure a reduction in surface water runoff in response to London Plan Policy 5.13 and draft London Plan Policy SI13 and the Sustainable Design and Construction SPG. The Council should secure the associated details by way of planning condition.

Legal Considerations

However, in this case GLA officers are recommending that the application is acceptable in strategic planning terms, and that Mayor agrees that the Council may proceed to determine the application itself, without the need for a further referral to the Mayor.

Addendum Item 4:

Paragraph 2.4 correction: Proposed no. parking spaces is revised to 621. Table below shows full breakdown:

	Total Spaces	Buses	RCV's	Cars & Tippers
Multi Storey	250 (39,69,69,73)	39		211
Surface Level	99	49		50
Development site	349	88		261
Cullington Close Car Park (Northern car park)	89	83		6
Refuse Car Park	65		55	10
Under CA site	15			15
Kenmore Avenue Car Parks	68	43		25
Unit 3	25			25
Unit 4 car park	10			10
Outside Development	274	126	55	91
Total Depot	621	214	55	352

There are 19 visitor / staff car parking spaces and the rest are designated for the operational fleet. Of these, 5 are disabled bays.

Addendum Item 5: Updated number of vehicle parking spaces

LB Harrow commissioned Arcadis to produce a Transport Assessment (TA) to support an application for the consolidation of the Depot site. This application sought to increase the overall quantum of vehicle parking taking place on the Depot site, with the proposal for a new multi-storey car park. The revised application currently under consideration assessed a maximum level of 623 vehicle parking spaces.

As outlined in section 6.4 of the supporting TA, this figure was considered a maximum level to take account of the site being fully utilised.

Following a design amendment to the layout, it has been noted that the level of vehicle parking is to be reduced to 621 vehicle parking spaces.

This represents a reduction in the overall vehicle parking numbers of less than half a percent.

As the supporting TA assessed the higher figure of 623 vehicle parking spaces, considered a worst case scenario, a further assessment for the revised 621 vehicle spaces is not considered required.

Arcadis can advise that the same methodology, assessment and conclusion reached in the TA remains valid and appropriate for the revised vehicle parking spaces. The analysis in the supporting TA, based on the higher vehicle parking number, concluded that the proposal could be accommodated on the highway network.

Addendum Item 6:

Paragraph 2.5 replace “4 storey” car parking to with “4 level” – The application proposes three storeys of multi-storey car parking comprising four levels; ground, first, second and third floors.

Addendum Item 7:

Internal Consultee Response (Planning Policy in relation to Energy Strategy):

The energy strategy (Boon Building Services / Red Engineering, dated 25 September 2018) broadly follows the approach required under the Mayor’s Energy Assessment Guidance, noting that the statement was prepared in September 2018 and the guidance updated in October 2018. There are therefore some inconsistencies with the statement and the revised guidance, which are considered below. It is understood that the application is referable to the Mayor of London; the comments below are made on that basis.

It is noted that the policy review section of the energy statement does not reference the Harrow and Wealdstone Area Action Plan, which includes AAP Policy 10 Harrow and Wealdstone District Heat Network. The statement does however address the proposed Wealdstone Heat Network elsewhere.

Calculations within the statement have been prepared using SAP 2012 carbon factors. Updated GLA guidance (October 2018) encourages that carbon savings are calculated using the more recent ‘SAP 10’ emission factors as these better reflect carbon emissions reductions now being achieved relative to the national electricity and gas

grids. Similarly, GLA guidance indicates that developments should be achieving better than just compliance with the Building Regulations through energy efficiency measures alone (at least a 15% improvement over Building Regulations). Some of the building fabric parameters outlined in the statement appear to exceed the benchmark values (i.e. roof, external glazing (offices) and air permeability); this essentially represents poor quality construction specification with associated higher running costs going forward.

However, given the GLA guidance was updated shortly after the statement was prepared and the application registered at the end of October 2018, it is considered acceptable in this instance for the statement to be based on the SAP 2012 carbon factors. Additional energy efficiency measures (particularly building fabric) should however be incorporated into the scheme in order to maximise carbon reduction through energy efficiency measures, as this is consistent with the current London Plan.

The statement correctly references work undertaken by the Council with respect to the district heat network and indicates the 'proposed development will include provision for the future connection of the building heating systems to the proposed district heating scheme'; no detail is provided as to how this will be achieved and further details should be sought.

The energy statement considers the potential for a Combined Heat and Power (CHP) engine as a form of low-carbon technology but discounts this due to the nature of the development, with limited baseload heat demand. Such a conclusion is consistent with GLA guidance. The potential carbon savings quoted in the energy strategy (30-45%) are considered too high relative to more recently published carbon emissions factors from mains electricity and gas supplies.

The energy statement proposes a combination of solar photovoltaic (PV) panels (producing zero carbon electricity) and air source heat pumps (zero carbon heat) in order to achieve the required 35% reductions in carbon emissions. Such an approach is considered reasonable given the nature of the site. The proposed air source heat pumps will however reduce the heat demand that would be met via a future connection to a district heat network and further information is required in this regard.

The overall carbon reductions proposed are 35%, which meets the requirement of the London Plan with respect to non-residential development. These reductions are achieved entirely through renewable energy measures, namely solar PV and air source heat pumps. There are however a number of areas where further information / clarification is required:

- (1) It is considered however that there is greater scope to reduce carbon emissions through energy efficiency measures and the proposed building fabric should reflect the 'lean' benchmarks included in the statement;
- (2) Additional / more specific information is required with respect to safeguarding future connection of the building to a district heat network; this should include safeguarded routes for the connection to the external district heat network (including any breakthrough points within the building fabric) and adequate space in plant room/s for heat exchangers etc.
- (3) It is also unclear as to the extent of the proposed communal heat network within the building as workshop spaces appear to be on individual heating systems; such an approach is not considered to be consistent with the heat network hierarchy in the

London Plan and would make connection to any future heat network more difficult.
(4) The extent that the proposed air source heat pumps will compete against any future district heat network should also be addressed as this does not appear to have been a consideration in determining the preferred renewable energy proposals.

It is preferable that the applicant seeks to address the above issues prior to the application going to Planning Committee. Should this not be possible, an updated energy strategy should be sought by way of a condition on any planning permission. The separate condition should also be applied requiring details of safeguarding measures to enable future connection to any district heat network.

Addendum Item 8: Correction – replace paragraph 7.12 with wording below:

The proposed plant store at fifth floor level would remain as per the approved scheme. It would not be highly visible from public vantage points given its limited depth and setbacks from three of the four building elevations. As such, it is not considered to be an incongruous addition to the proposed building and would continue the stepped roof form already established by the approved scheme (P/4767/17). Based on this and the use of matching materials it is not considered that this element would harm the character and appearance of the proposed building and on this basis would be acceptable in design terms.

Addendum Item 9: Revised Condition Wording

Noise Management Plan (Condition 7):

The development shall not begin until a noise management plan which specifies the provisions to be made for the control of noise from mechanical works (i.e. from the vehicle repair works and other industries that are proposed on site and in the future) and service yard operation has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include such combination of physical, administrative measures, noise limits and other measures as may be approved by the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures. It is recommended that BS8233 is referred to in complying with this condition. Reason: To ensure that adequate precautions are taken to avoid noise nuisance to occupiers of the proposed office accommodation and to safeguard the amenity of neighbouring residents.

Condition 13 (Cycle Storage)

Notwithstanding the approved plans, a revised Ground Floor Layout Plan shall be submitted to and approved by the Local Planning Authority prior to commencement of development, detailing the location, number and siting of cycle spaces.

Reason: To provide safe and accessible cycle storage for the use of the occupier.

Condition 15: External Lighting

No floodlighting or other form of external lighting shall be installed unless it is in accordance with details which have previously been submitted to and approved in writing by the Local Planning Authority. Such details shall include location, height, type and direction of light sources and intensity of illumination. Any lighting that is so installed shall not thereafter be altered without the prior consent in writing of the Local Planning Authority other than for routine maintenance which does not change its details.

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

Consolidation of conditions 5 and 16:

The development hereby permitted shall not commence until an Energy Strategy is submitted to and approved by the Local Planning Authority. The Energy Strategy should address the energy hierarchy and carbon emission 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 details approved within these documents shall be implemented and retained thereafter. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the first occupation of the development, a post construction assessment shall be undertaken for each phase demonstrating compliance with the approved Sustainability Strategy which thereafter shall be submitted to the Local Planning Authority for written approval.

Reason: To ensure that the proposed development follows the energy hierarchy outlined in the 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 S13 (Energy Infrastructure), and Harrow and Wealdstone Area Action Plan Policy AAP10: Harrow & Wealdstone District Energy Network.

Addendum Item 10: Addition of conditions

(Construction Environmental Management Plan (CEMP))

Before the development hereby approved commences, a Construction Environmental Management Plan (CEMP) shall be submitted to, and approved in writing by the Local Planning Authority. The CEMP shall comprise such combination of measures for controlling the effects of demolition, construction and enabling works associated with the development as may be approved by the Local Planning Authority. The CEMP shall address issues including the phasing of the works, hours of work, noise and vibration, air quality, waste management, site remediation, plant and equipment, site transportation and traffic management including routing, signage, permitted hours for construction traffic and construction materials deliveries. It will ensure appropriate communication with, the distribution of information to, the local community and the Local Planning Authority relating to relevant aspects of construction. Appropriate arrangement should be made for monitoring and responding to complaints relating to demolition and construction. All demolition, construction and enabling work at the development shall be carried out in accordance with the approved CEMP unless otherwise agreed in writing by the LPA.

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

Addendum Item 11: Addition of SUDS informative in line with GLA response:

LBHPC I 05 SUDS

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

SUDS involve a range of techniques including soakaways, infiltration trenches,

	<p>permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soakaways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2018) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.</p> <p>The applicant can contact Harrow Infrastructure Team for further information. Reason: To manage, reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.</p>
2/02	<p>ADDENDUM INFORMATION</p> <p>1. Representations have been received by way of emails relating to time of notice for this committee meeting stating that application be deferred until February as local residents and objectors have not given 5 working days as stipulated in the Council's Guidance notes for members of the public attending the planning committee meetings so as allow the objectors to have an appropriate amount of time to review the tabled 47 page document and be in attendance and to nominate a person to speak on their behalf.</p> <p><u>Officer Comment:</u> Officers can confirm that notification letter was sent to local residents and objectors on 16th January 2019. This gives 5 working days to the date of the Committee meeting in line with Council guidance, and as such provides time for representation at the meeting. In addition, representations/ objections received have been taken into account in the consideration of the application. It is therefore considered that no one will be prejudiced by not deferring the decision process as being requested.</p> <p>2 Delete Condition 3 and replace with</p> <p><u>Materials</u></p> <p>Notwithstanding the approved layout Drawing Number 2015-20-PL-40-BLK, the development hereby permitted shall not commence beyond damp proof course level until samples of the materials to be used in the construction of the external surfaces noted below have been submitted or made available to view on site to, and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> a: the building b: the ground surfacing c: the boundary treatment

