



Report to West Area Planning Committee

Application Number:	21/06007/VCDN
Proposal:	Variation of condition 2 (plan) attached to 18/08309/FUL (Demolition of existing buildings and construction of an up to five storey building containing 58 x 1 bed flats to be provided as temporary housing accommodation, re-provision of the British Red Cross Office in dual (B1 and A1) use, together with alterations to access, landscaping and associated works) to allow for substitution of amended plans
Site Location:	Car Park 0505 C35 West End Road High Wycombe Buckinghamshire
Applicant:	Buckinghamshire Council
Case Officer:	Declan Cleary
Ward(s) affected:	Abbey
Parish-Town Council:	High Wycombe Town Unparished
Date valid application received:	5 th April 2021
Statutory determination date:	5 th July 2021
Recommendation	Approve with conditions

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The application seeks amendment to the approved drawings attached to Planning Permission 18/08309/FUL.
- 1.2 The proposed alterations include the installation of a substation, the removal of windows within the southern elevation, minor repositioning of buildings within the site layout, and details of hard and soft landscaping.
- 1.3 While the siting of the proposed sub-station is not ideal in the context of the streetscene, it is noted that the development is necessary and the location proposed is the more convenient and practical location for the building. Furthermore, strengthened landscaping would help to soften the impact of the sub-station. Therefore, the amended scheme is considered to be acceptable in terms of issues relating to design, amenity and highways and the application is recommended for approval.
- 1.4 The application is referred to the West Area Planning Committee for determination because the applicant is Buckinghamshire Council.

2.0 Description of Proposed Development

- 2.1 The application site relates to the former Desborough Road public car park which is located within the Town Centre Boundary for High Wycombe. Planning permission 18/08309/FUL was granted on 30th April 2019 for the construction of a five storey building comprising 58 1-bedroom flats to provide temporary housing accommodation, along with a replacement British Red Cross office. That development was considered and approved by Planning Committee.
- 2.2 That planning permission has been implemented and the development is at an advance stage of construction.
- 2.3 This application seeks amendments to the approved development by seeking to regularise the minor changes in the footprint, layout, elevational detail, and internal layout of the development. In summary the alterations relate to:
- Size and shape of central lift core;
 - Position of riser locations in stair cores;
 - Position and size of stair cores;
 - Orientation of cycle store;
 - Removal of partition in plant room
 - Change to openings serving Housing Office;
 - Removal of windows in British Red Cross building;
 - Provision of higher balcony screens in south eastern corner; and,
 - Removal of openings in the south elevation at 1st to 4th floors.
- 2.4 The alterations also seek approval for the construction of a sub-station and associated meter kiosk which is proposed to be sited adjacent to the access from Desborough Road.
- 2.5 Finally, the application also seeks approval of the hard and soft landscaping within the site.
- 2.6 The application is made under Section 73 of the Planning Act. Although often referred to as an application to vary or remove a condition an application under this section of the Act actually has no effect on the original permission; it is not an amendment to the earlier permission. It is a separate freestanding permission that the applicant is entitled to implement or ignore. This application must therefore be capable of being implemented in its own right and therefore all appropriate conditions and obligations must be imposed.
- 2.7 The merits of the condition(s) must be assessed against an up to date development plan. As any permission granted would in effect be a free standing planning permission all conditions to which the planning permission should adhere must be reattached. Section 73 of the Town and Country Planning Act 1990 (as amended) states:
- “Determination of applications to develop land without compliance with conditions previously attached.
- (1) This section applies, subject to subsection (4), to applications for planning permission for the development of land without complying with conditions subject to which a previous planning permission was granted.
- (2) On such an application the local planning authority shall consider only the question of the conditions subject to which planning permission should be granted, and—

(a) if they decide that planning permission should be granted subject to conditions differing from those subject to which the previous permission was granted, or that it should be granted unconditionally, they shall grant planning permission accordingly, and

(b) if they decide that planning permission should be granted subject to the same conditions as those subject to which the previous permission was granted, they shall refuse the application.”

3.0 Relevant Planning History

Reference	Development	Decision	Decision Date
18/08309/FUL	Demolition of existing buildings and construction of an up to five storey building containing 58 x 1 bed flats to be provided as temporary housing accommodation, re-provision of the British Red Cross Office in dual (B1 and A1) use, together with alterations to access, landscaping and associated works	PER	30 April 2019

4.0 Policy Considerations and Evaluation

Principle and Location of Development

Wycombe District Local Plan (August 2019): CP1 (Delivering Sustainable Development); CP2 (Overall Spatial Strategy); CP3 (Settlement Strategy); CP4 (Delivering Homes); CP6 (Delivering Vibrant and High Quality Town Centres); DM21 (The Location of New Housing)

DSA: DM1 (Presumption in favour of sustainable development); DM6 (Mixed-Use Development); DM7 (Town Centre Boundaries)

4.1 Planning permission 18/08309/FUL has established that the principle for the development of 58 flats as temporary accommodation, and the delivery of a British Red Cross Office in this location is acceptable. That permission has been implemented and is at an advanced stage of construction. The proposed alterations do not alter the quantum or nature of development to that previously approved. Therefore, it is not necessary to revisit the principle of the development under this current application. The main considerations in this instance are therefore whether the proposed alterations give rise to any additional design, amenity or highways issues, these are explored below.

Transport matters and parking

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), DM33 (Managing Carbon Emissions, Transport and Energy Generation)

DSA: DM2 (Transport requirements of development sites)

4.2 The scheme does not propose to change the quantum of development or the number of bedrooms within the scheme, and therefore there would be no requirement to reconsider the parking provision within the development. Notwithstanding this, the scheme proposes parking for the adjacent Kings Church High Wycombe which is accessed via Desborough Road. Concern has been raised that the proposals would result in the loss of a car parking space to serve that development.

- 4.3 The layout as proposed includes the availability of the parking spaces as proposed, however one of the spaces is no longer numbered on the plans, and its accessibility would be impeded by a re-sited cycle parking rack. The space would therefore be unavailable for practical use. The applicant has provided written agreement to the principle of re-siting the cycle spaces to an alternative location within the site.
- 4.4 BC Highways have observed the loss of this parking bay and the removal of a drop off pick up bay, but have concluded that these alterations would not result in highway safety concerns given the surrounding restricted parking and waiting zone. Therefore, the LPA conclude that no adverse impacts on highway safety would arise from the proposed development.
- 4.5 Notwithstanding this, it is considered reasonable for the purposes of good planning to ensure that all parking spaces which are provided are available for use. Therefore, a condition should be attached to any approval for the cycle parking to be re-sited within the development. There is an opportunity for these to be provided on the grassed area adjacent to the parking bays/proposed substation.

Raising the quality of place making and design

Wycombe District Local Plan (August 2019): CP9 (Sense of place); DM35 (Placemaking and Design Quality)

- 4.6 The application proposes numerous alterations to the approved development, including slight changes to layout and design. The majority of these alterations, including the changes to lift and stair cores, riser locations, orientation of cycle store, internal alterations, balconies, and openings to British Red Cross Building and Housing Office, are very minor alterations and imperceptible changes in the context of the scale of the scheme and, as such, are likely to be considered to be non-material minor amendments to the scheme proposed both individually and cumulatively.
- 4.7 The more noticeable alterations in respect of the scheme relate to the provision of a substation and the removal of 4 openings in the upper floors of the southern elevation.
- 4.8 The proposed substation would be provided on the Desborough Road frontage, sited adjacent to the Kings Church and access to the parking area. The substation would be housed in a grey chamber measuring 3.1m (w) x 3.1(l) x 2.2m (h), to the rear of the substation a smaller meter kiosk is proposed. The proposed substation and meter kiosk would be surrounded by a fenced enclosure. The fencing would match the approved fencing found within the remainder of the development.
- 4.9 The siting and design of the substation is such that it would result in a noticeable addition on the streetscene which would not contribute towards, or enhance, the character and appearance of the area to any significant degree. The LPA has therefore some concerns over the integration of the development into the substation. Additional information has been provided to justify the location of the proposal which is dictated by the location of High Voltage network cabling in the location, which runs along Desborough Road. Alternative locations would be further away from the HV network and would require strengthening of existing substations and underground cabling. Furthermore, the location has 24/7 unhindered access from the public highway which is required for maintenance.
- 4.10 Alternative locations have been considered. Providing the substation within the courtyard of the development would have no vehicular access, while the site would be secure and not have 24/7 access for the utility provider. A location off West End Road was considered but deemed not to be appropriate due to the proximity from the HV network,

the loss of parking for the British Red Cross, and due to its likely proximity to buildings would need to be within a larger brick structure.

- 4.11 It is therefore accepted that a substation is required to serve the development proposed and the location of the substation is the only feasible option. It is proposed within the landscaping scheme to provide planting along the roadside frontage, which would help to soften the impact of the development. Notwithstanding this, the landscaping proposed is low level and would not be sufficient for screening purposes. It is considered that alternative landscaping could be provided which would provide suitable screening of the development. This could be secured by condition.
- 4.12 It should also be highlighted that substations can often be permitted development and it is possible that a similar proposal could be provided on the land without requiring planning permission. While the LPA have the control over the development at this time, it is considered that the proposed additional landscaping measures, to soften the appearance of the proposal, would be advantageous to the quality of the scheme which could not be insisted upon through any installation provided under permitted development.
- 4.13 With regard to the removal of openings on the southern elevation, concern has been raised by the Urban Design Officer that the removal of these windows would remove the surveillance from the site of the car parking spaces immediately below the openings. While this concern is noted it must be acknowledged that there are windows and balconies within adjoining properties to the north and west which have direct sight of this area and would provide the surveillance over this parcel of land. In terms of character and appearance of the development, no concerns have been raised in respect of their removal. Therefore it is considered that the removal of these openings would not have a detrimental impact on the overall design quality of development.
- 4.14 With regard to the proposed hard and soft landscaping, the proposals include landscaping of appropriate quality to provide interest in the streetscene and a quality environment for the residents of the proposed development. The landscaping scheme has been supported by the Urban Design Officer, subject to additional screening of the substation.

Amenity of existing and future residents

Wycombe District Local Plan (August 2019): DM35 (Placemaking and Design Quality)

- 4.15 The proposed development does not seek to alter the scale of the approved building and the relationship with adjoining properties would remain largely as previously approved. There are no additional openings provided which would face directly towards residential properties. The development would therefore have no greater impact on the amenity of neighbouring dwellings through overbearing, loss of daylight/sunlight, overlooking or loss of privacy.

Other Matters – consideration of previously imposed conditions

- 4.16 As this application is made under s.73 of The Act, it is necessary to consider whether the conditions imposed on planning permission 18/08309/FUL remain relevant and should be re-imposed on any approval.
- 4.17 Condition 1 – Standard Time Limit. Condition 1 should be deleted as the development has commenced.
- 4.18 Condition 2 – Approved Plans. Condition 2 to be amended to reflect the amended plans approved under this application.

- 4.19 Condition 3 – Restriction of use for temporary accommodation. Condition 3 to be retained unaltered.
- 4.20 Condition 4 – Materials – Condition 4 to be retained and amended to reflect approved details approved under discharge of condition applications.
- 4.21 Condition 5 – Surfacing Materials – Condition 5 retained and amended to reflect hard surfacing materials approved under this application.
- 4.22 Condition 6 – Surface Water Drainage – Condition 6 retained and amended to reflect drainage scheme approved under discharge of condition application.
- 4.23 Condition 7 – Surface Water Drainage Maintenance Plan - Condition 7 retained and amended to reflect details approved under discharge of condition application.
- 4.24 Condition 8 – Surface Water Drainage Verification – Condition 8 to be retained unaltered.
- 4.25 Condition 9 – Ecological Impact and Management Plan - Condition 9 retained and amended to reflect details scheme approved under discharge of condition application.
- 4.26 Condition 10 – Installation of photovoltaic panels - Condition 10 retained unaltered.
- 4.27 Condition 11 – Hard and Soft Landscaping scheme - Condition 11 retained and amended to reflect landscaping scheme approved under this application.
- 4.28 Condition 12 – Security Assessment - Condition 12 retained and amended to reflect details scheme approved under discharge of condition application.
- 4.29 Condition 13 – Secured by Design Silver Award - Condition 13 retained and amended to reflect details scheme approved under discharge of condition application.
- 4.30 Condition 14 – Lighting Scheme - Condition 14 to be retained unaltered.
- 4.31 Condition 15 – Provision of access to West End Road parking - Condition 15 to be retained unaltered.
- 4.32 Condition 16 – New access - Condition 16 to be retained unaltered.
- 4.33 Condition 17 – Stopping up of West End Road Access - Condition 17 to be retained unaltered.
- 4.34 Condition 18 – Removal of permitted development rights for access road gates - Condition 18 to be retained unaltered.
- 4.35 Condition 19 – Parking scheme to be provided - Condition 19 to be retained unaltered.
- 4.36 Condition 20 – Construction Traffic Management Plan - Condition 20 retained and amended to reflect details scheme approved under discharge of condition application.
- 4.37 Condition 21 – Replacement Car Park – Condition 21 shall be deleted as planning permission 18/08040/R9FUL has been implemented.

5.0 Weighing and balancing of issues / Overall Assessment

- 5.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
- b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
- c. Any other material considerations

5.2 As set out above it is considered that the proposed development would not give rise to any additional adverse design, amenity or highways issues, subject to additional conditions, and as such would accord with the policies within the development plan policies.

6.0 Working with the applicant / agent

- 6.1 In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 6.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 6.3 In this instance concerns were raised with regard to the development and the opportunity was given to address the concerns, and provide additional information to support the development.

7.0 Recommendation

Approve subject to the following conditions and reasons:

1. Standard Time Limit – DELETED
2. The development hereby permitted shall be built in accordance with the details contained in the planning application hereby approved and plan numbers:
 - DES-RSHP-XX-ST-DR-AR-0001 REV P01 - Existing Site Plan (approved under 18/08309/FUL)
 - DES-RSHP-XX-ST-DR-AR-0004 REV P01 - Existing Block Plan (approved under 18/08309/FUL)
 - DSB-AST-XX-XX-DR-A-010610 – Proposed Site Plan
 - DSB-AST-XX-XX-DR-A-010615 - Proposed Block Plan
 - DSB-AST-XX-GF-DR-A-010720 - Ground Floor Plan
 - DSB-AST-XX-01-DR-A-010721 – Proposed First Floor Plan
 - DSB-AST-XX-02-DR-A-010722 – Proposed Second Floor Plan
 - DSB-AST-XX-ZZ-DR-A-010723 – Proposed Typical Upper Levels 3 and 4
 - DSB-AST-XX-RF-DR-A-010725 – Proposed Roof Plan
 - DSB-AST-XX-ZZ-DR-A-010810 – Proposed North Elevation
 - DSB-AST-XX-ZZ-DR-A-010811 – Proposed South Elevation
 - DSB-AST-XX-ZZ-DR-A-010812 – Proposed East Elevation
 - DSB-AST-XX-ZZ-DR-A-010813 – Proposed West Elevation
 - DES-RSHP-XX-D-DR-AR-15000 REV P01 - External Elevations - Typical Unit (approved under 18/08309/FUL)
 - DSB-AST-XX-ZZ-DR-A-010910 - Section A-A
 - DSB-AST-XX-ZZ-DR-A-010811 - Section B-B
 - DSB-AST-XX-ZZ-DR-A-010812 - Section Z-Z

Landscaping Plans:

- Q096/02 REV A - Existing Site Tree and Existing Trees (approved under 18/08309/FUL)
- SD/572/1.1 Rev 6 – Masterplan
- SD/572/1.2 Rev 6 – Hard Landscape Materials
- SD/572/1.3 Rev 6 – Soft Landscaping
- SD/572/2.2 Rev 6 – Dimensions
- SD/572/3.1 Rev 6 – Tree Scheme
- SD/572/3.2 Rev 6 – Planting Scheme – perennials and shrubs

Reason: In the interest of proper planning and to ensure a satisfactory development of the site.

3. The development approved shall only be used as temporary accommodation for people deemed by the Local Housing Authority to be homeless and shall not be used for any other residential purpose within use class C3 without the prior approval of the Local Planning Authority.

Reason: The proposal has been assessed on the basis that it provides temporary accommodation for those assessed as homeless and this has carried significant weight in terms of parking considerations, affordable housing requirements and open space requirements. Were the development to be used for general residential purposes these various aspects would have to be assessed differently and planning permission would not necessarily be forthcoming.

4. The development shall not be carried out other than in accordance with the materials approved under the applications for detail reserved by condition references 20/05878/ADRC, 20/06361/ADRC, 20/06806/ADRC and 21/06431/ADRC.

Reason: To secure a satisfactory external appearance.

5. The development shall not be carried out other than in accordance with the hard surfacing details hereby approved.

Reason: To secure a satisfactory appearance.

6. The development hereby approved shall be implemented in accordance with the surface water drainage scheme approved under the application for detail reserved by condition referenced 20/06284/ADRC.

Reason: To ensure that there is a satisfactory solution to managing flood risk.

7. The development hereby approved shall be implemented in accordance with the “whole life” maintenance plan for the drainage scheme, as approved under the application for detail reserved by condition referenced 20/06284/ADRC.

Reason: To ensure that maintenance arrangements have been arranged in the interest of managing flood risk.

8. Prior to the first occupation of the development, a demonstration (such as as-built drawings and/or photographic evidence) of the as-built surface water drainage scheme carried out by a suitably qualified person must be submitted to and approved by the Local Planning Authority to demonstrate that the Sustainable Drainage System has been constructed as per the agreed scheme.

Reason: The reason for this pre-occupation condition is to ensure the Sustainable Drainage System has been constructed as per the approved is designed to the technical standards

9. The development shall be carried out in accordance with the approved Ecological Impact and Management Plan, approved under the application for detail reserved by condition referenced 20/06284/ADRC, unless otherwise first agreed in writing by the Local Planning Authority.
Reason: To make appropriate provision for natural habitat within the approved development and to provide a reliable process for implementation and aftercare.
10. Prior to occupation of the development details of the photo voltaic panels to be installed on the roof of the development shall be submitted to and approved in writing by the Local Planning Authority. Thereafter only the approved details shall be installed on the roof and retained for the life of the development unless otherwise agreed in writing.
Reason: To ensure that the design of the photo voltaic panels are appropriate to the building and do not impact negatively on the character of the street scene.
11. The development shall be implemented and maintained in accordance with the hard and soft landscaping details hereby approved, and as detailed in the plans referenced under condition 2, unless otherwise agreed in writing by the Local Planning Authority.
All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the buildings or the completion of the development, whichever is the sooner. Any trees, plants or areas of turfing or seeding which, within a period of 3 years from the completion of the development, die are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority first gives written consent to any variation.
Reason: In the interests of amenity and to ensure a satisfactory standard of landscaping.
12. Prior to occupation a security needs and operational requirement assessment (security strategy) must be conducted and submitted to the Local Planning Authority. This should include the provision of CCTV to enable adequate surveillance internally and externally of the development. Once approved the security strategy should then be implemented prior to the occupation of the building.
The police Secured by Design (SBD) website will provide further information and companies who can assist <http://www.securedbydesign.com>
Reason: In the interests of preventing crime and anti-social behaviour.
13. The development shall be carried out in accordance with the approved Secured by Design Application, as approved under the application for detail reserved by condition referenced 21/06431/ADRC, and shall not be occupied or used until the Local Authority acknowledges in writing it has received written confirmation that the site has successfully achieved the Silver Physical Security Award.
Reason: To ensure that the development is designed to achieve the physical security requirements that the crime statistics indicate would be appropriate for this location.
14. Prior to occupation a lighting scheme which provides sufficient lighting along West End Road (Eastern section) to allow any natural surveillance that may be present on Desborough Road to be effective shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved details shall be implemented and should remain in place for the lifetime of the development.

Reason: In the interests of preventing crime and anti-social behaviour by enhancing the lighting in West End Road to enable natural surveillance of this area from Desborough Road.

15. No other part of the development shall be occupied until the new means of access to the West End Road parking spaces has been sited and laid out in accordance with the approved drawing and constructed in accordance with Buckinghamshire County Council's guide note "Private Vehicular Access Within Highway Limits" 2013.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

16. No other part of the development shall be occupied until the new means of access has been sited and laid out in accordance with the approved drawing and constructed in accordance with Buckinghamshire County Council's guide note "Commercial Vehicular Access Within Highway Limits" 2013.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

17. Within one month of occupation, the West End Road car park access not incorporated in the development hereby permitted shall be stopped up by raising the existing dropped kerb and reinstating the footway and highway boundary to the same line, level and detail as the adjoining footway and highway boundary.

Reason: To limit the number of access points along the site boundary for the safety and convenience of the highway user.

18. Notwithstanding the provisions of Part 2 of the Second Schedule to the Town and Country Planning (General Permitted Development)(England) Order 2015 (or any Order revoking or re-enacting that Order) no gates shall be erected over the Desborough Road vehicular access point.

Reason: To enable vehicles to draw off clear of the highway for the safety and convenience of the highway users.

19. The scheme for parking and manoeuvring indicated on the submitted plans shall be laid out prior to the initial occupation of the development hereby permitted and that area shall not thereafter be used for any other purpose.

Reason: To enable vehicles to draw off, park and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

20. The development shall be carried out in accordance with the Construction Traffic Management Plan as approved under the application for detail reserved by condition referenced 20/06284/ADRC.

Reason: To ensure that the development does not cause danger, obstruction and inconvenience to users of the highway.

21. Implementation of 18/08040/R9FUL – DELETED

22. Notwithstanding the details contained within the landscaping scheme hereby approved, prior to the first occupation of the development, a detailed scheme for planting to screen the approved substation enclosure shall be submitted to the Local Planning Authority for

approval. The approved details shall be implemented and maintained in accordance with the requirements set out in condition 11.

Reason: In the interest of the satisfactory appearance of the development.

23. Notwithstanding the details contained within the approved plans, prior to the first occupation of the development, a scheme for an alternative siting of the cycle parking to serve Kings Church High Wycombe, shall be submitted to the Local Planning Authority for approval. The cycle parking shall be provided in accordance with the approved details only prior to first occupation of the development hereby approved.

Reason: To ensure that ensure satisfactory access and egress to parking spaces.

INFORMATIVE

In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments. The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application. In this instance concerns were raised with regard to part of the development and an opportunity to address the concerns and provide additional information was given to ensure that a sustainable form of development could be delivered.

APPENDIX A: Consultation Responses and Representations

Councillor Comments – None received

Parish/Town Council Comments – N/A

Consultation Responses

BC Highways – The application seeks a variation of condition 2 of planning permission 18/08309/FUL to allow for alterations to the plans. The main amendment from a highway perspective is the removal of one on-site pick-up and drop-off bay. It also appears that one church parking space located partially within the site is lost.

In consideration that this section of Desborough Road is within a restricted parking and waiting zone, I am satisfied that the removal of these bays would not result in an unacceptable impact to highway safety and convenience.

The Highway Authority raises no objections to the variation of condition 2 attached to planning permission 18/08309/FUL. (05/05/21)

BC Urban Design Officer – Further Comments - Sub Station - The applicant seems to have exhausted all other options for the substation. The planting proposed in front of the Substation does not have a very tall mature height (075-1m). I suggest replacing it with larger, taller shrubs to provide a better visual screen from the street. I also suggest the landscape screen needs to extend down the side of the substation facing the Kings Centre to mitigate views from the entrance.

Omission of windows on upper floors of the southern elevation - From the letter it is a little unclear what they are proposing. I am presuming that the windows are being reinstated as it was an oversight to omit them?

Landscape Details - Revisions / additions to the planting plan are now acceptable

Watering - as this is on the recommendations of the tree nursery, this is accepted. (15/07/21)

BC Urban Design Officer - Initial Comments - Sub Station - The new substation is a regrettable addition to the scheme that will impact the quality of the street scene. Could it be repositioned further into the site so it is less prominent?? The applicant mentions the substation at Safe Store. It is positioned alongside an existing building so it is less prominent in the street scene than this one will be.

Omission of windows on upper floors of the southern elevation - These windows were added to the scheme to provide more surveillance to the corner parking area in response to previous comments made at the time of the application. This corner is not otherwise well overlooked by the development so their removal could not be supported in Urban Design terms.

The other minor amendments outlined in the letter do not raise any Urban Design concerns. (06/05/21)

Representations

2 letters of representation received, on following grounds:

- Proposals show 6 spaces to serve the adjacent church. Deeds with Council state that 7 spaces should be provided;
- Location of substation will degrade area, should be relocated to West End Road which will allow for more parking spaces to be provided and easier maintenance;
- Cycle racks will obstruct access to parking space and should be relocated.

APPENDIX B: Site Location Plan

21/06007/VCDN

Scale 1/1250

