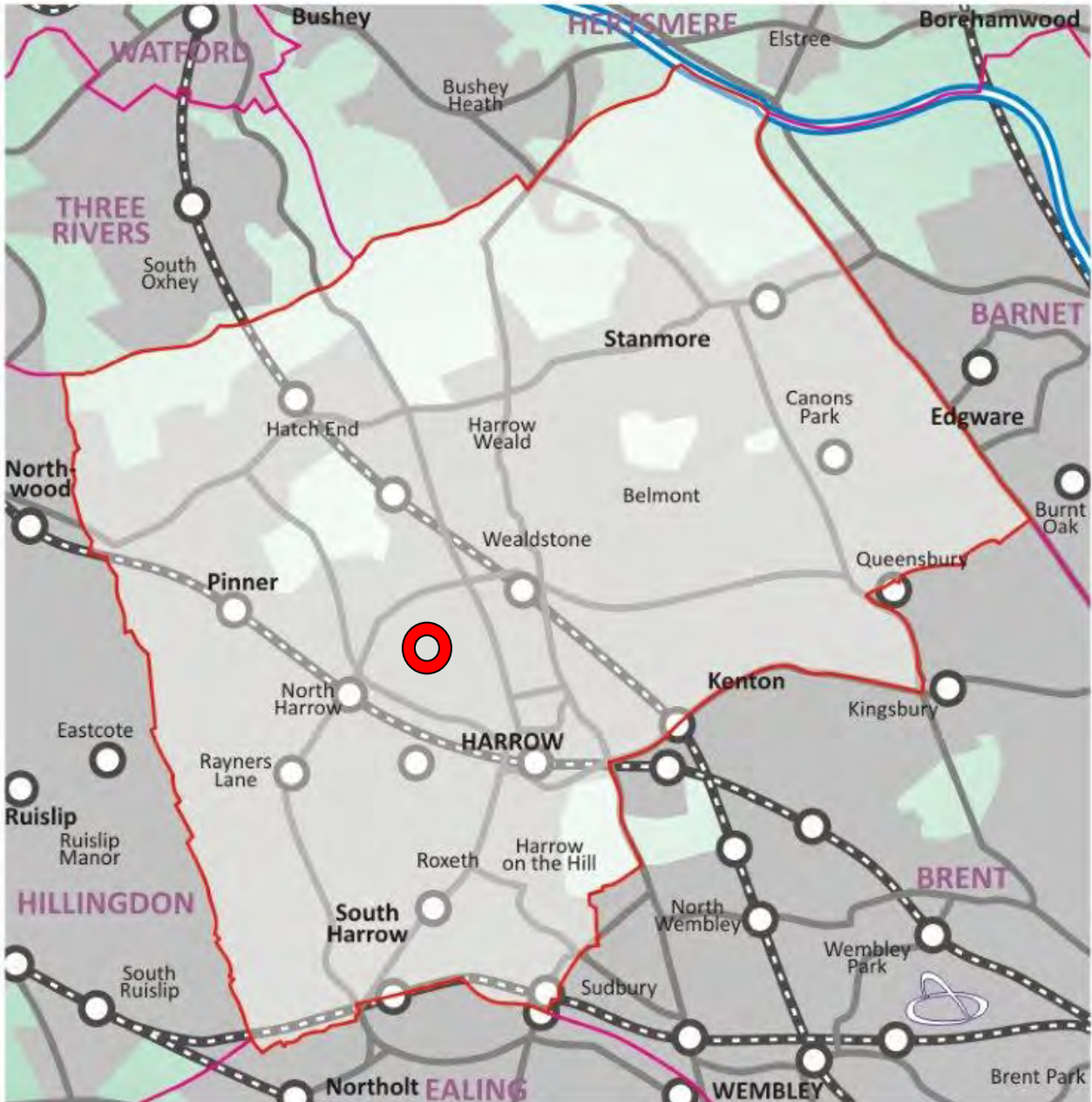
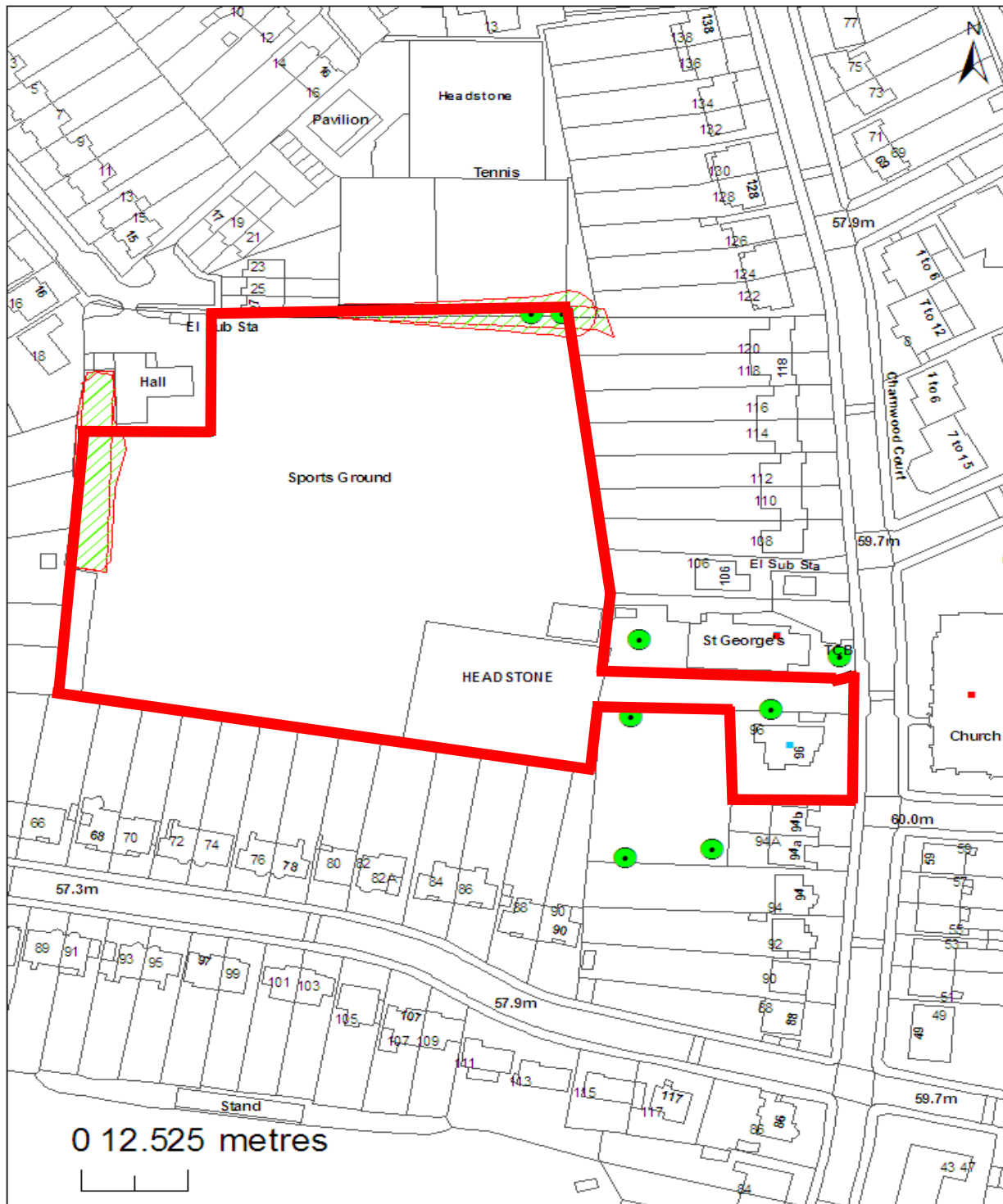


 = application site



St Georges Church Field, Pinner View, Harrow	P/3673/16 & P/3882/16
---	----------------------------------



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA 100019206. 2011. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2010)



St Georges Church Field, Pinner View, Harrow **P/3673/16 & P/3882/16**

LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

16TH November 2016

Application Number: P/3673/16 & P/3882/16
Validate Date: 11/08/2016
Location: St. Georges Church Field, Pinner View, Harrow
Ward: Headstone North
Postcode: HA1 4RJ
Applicant: Notting Hill Housing
Agent: GL Hearn
Case Officer: Graham Mansfield
Expiry Date: 23rd November 2016

PURPOSE OF REPORT/PROPOSAL:

The purpose of this report is to set out the Officer recommendations to The Planning Committee regarding applications for planning permission relating to the following proposals.

P/3673/16; Minor Material Amendment to Vary Condition 1 (Approved Plans) of Planning Permission P/0479/15 dated 04/09/2015 to Allow Alterations to 8 of the residential units to Provide 3 Bedroom Units in place of the Approved 4 Bedroom Units; Alteration to Siting and Scale of the Turning Area For Refuse and Emergency Vehicles; Minor Changes to the Porches on 14 units.

P/3882/16; Modification to Section 106 Agreement relating to Planning Permission P/2336/11 dated 10/02/2012 to allow amendment of 8 of the residential units from 4 bed houses to 3 bed houses with authority to be given to the Divisional Director of Planning in consultation with the Director of Legal and Governance Services for the sealing of the Section 106 agreement and to agree any minor amendments to the conditions or the legal agreement.

- i) To connect the change of bedroom mix for the affordable residential units
- ii) To Amend the S.106 to capture the administrative changes

RECOMMENDATION

The planning committee is asked to:

- 1) Agree the reasons for approval set out in this report
- 2) Grant both planning permissions subject to the conditions listed in appendix 1 of this report.

REASON FOR THE RECOMMENDATIONS:

The proposed development would continue to provide new private and affordable homes, contributing to the delivery of new housing required by The London Plan (2016) and the Harrow Core Strategy (2012). The minor amendments in terms of the variations to the front porches would continue to provide a high quality development within both the application site and surrounding area. The revised turning circle would improve the highway safety and access for the proposed development whilst maintaining the

functionality and appearance of the remaining open space. The revisions to the bedroom numbers would reflect the needs of Harrow's Housing requirements and whilst maintaining the mix of accommodation on site.

RECOMMENDATION B

That if, by 16th March 2017 or such extended period as may be agreed in writing by the Divisional Director of Planning, the section 106 is not amended, then delegate the decision to the Divisional Director of Planning to REFUSE planning permission for the appropriate reason:

The proposed development, in the absence of a legal agreement to provide appropriate level of affordable housing on site provision that directly relate to the development, would fail to comply with the requirements of policies 3.11 and 3.12 of The London Plan 2016 and policy CS1.J of the Harrow Core Strategy 2012, which seeks to maximise the provision of affordable housing delivery within the borough.

INFORMATION

This application is reported to Planning Committee as it is for the construction of more than two dwellings and therefore falls outside Schedule 1b of the Scheme of Delegation.

Statutory Return Type:	E(18) Major Development: All Other
Council Interest:	None
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	N/A
Local CIL requirement:	N/A

HUMAN RIGHTS ACT

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

EQUALITIES

In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk.

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 BACKGROUND PAPERS USED IN PREPARING THIS REPORT:

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- Nation Planning Policy Framework
- London Plan
- Local Plan - Core Strategy, Development Management Policies, SPGs
- Other relevant guidance

LIST OF ENCLOSURES / APPENDICES:

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

Appendix 2 – Site Plan

Appendix 3 – Site Photographs

Appendix 4 – Plans and Elevations

OFFICER REPORT

PART 1 : Planning Application Fact Sheet

The Site	
Address	St. Georges Church Field, Pinner View, Harrow, HA1 4RJ
Applicant	Notting Hill Housing
Ward	Headstone North
Local Plan allocation	n/a
Conservation Area	n/a
Listed Building	Adjacent to St. Georges Church Hall Grade II Listed
Setting of Listed Building	n/a
Building of Local Interest	Adjacent to St. Georges Vicarage Locally Listed
Tree Preservation Order	Various around the boundary to the site
Other	n/a

Housing		
Density	Proposed Density hr/ha	48.8
	Proposed Density u/ph	15.8
	PTAL	0
	London Plan Density Range	35 – 55
Dwelling Mix	Studio (no. / %)	N/A
	1 bed (3no. / %)	7
	2 bed (3no. / %)	8
	3 bed (no. / %)	12
	4 bed (no. / %)	N/A
	Overall % of Affordable Housing	66%
	Affordable Rent (no. / %)	14 (51%)
	Intermediate (no. / %)	4 (14%)
	Private (no. / %)	9 (33%)
	Commuted Sum	N/A
	Comply with London Housing SPG?	Complies
	Comply with M4(2) of Building Regulations?	Secured by Condition

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	N/A
	Existing Use Class(es) sqm	Open Space
Proposed Use(s)	Proposed Use / Operator	Residential Development and Open Space
	Proposed Use Class(es) sqm	Use Class C3
Employment	Existing number of jobs	Unknown
	Proposed number of jobs	Unknown

Transportation		
Car parking	No. Existing Car Parking spaces	0
	No. Proposed Car Parking spaces	37 (includes 10 spaces for Church Hall)
	Proposed Parking Ratio	1:1
Cycle Parking	No. Existing Cycle Parking spaces	None
	No. Proposed Cycle Parking spaces	Storage for each dwelling
	Cycle Parking Ratio	1:1
Public Transport	PTAL Rating	0
	Closest Rail Station / Distance (m)	1,350m (North Harrow Station)
	Bus Routes	No's H9 and H10 on Parkside Way No. 183 on Pinner Road
Parking Controls	Controlled Parking Zone?	N/A
	CPZ Hours	N/A
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls	N/A
Parking Stress	Area/streets of parking stress survey	N/A
	Dates/times of parking stress survey	N/A
	Summary of results of survey	N/A
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Secured by Condition

Sustainability / Energy	
Development complies with Part L 2013	Secured by Condition
Renewable Energy Source / %	Secured by Condition

PART 2 : ASSESSMENT

1.0 SITE DESCRIPTION

- 1.1 The application site is an area of open space associated with St Georges Parochial Church located on Pinner View.
- 1.2 The site is bound by a largely residential area made up of typical metroland semi-detached properties. The rear gardens of properties on Kingsfield Avenue are located to the south, Kingsway Crescent to the west, Churchfield Close/Headstone Lawn Tennis Club to the north and Pinner View to the east.
- 1.3 The site is approximately 1.7 ha in size, roughly rectangular with a generally flat topography. A number of trees and shrubs are adjacent to the boundaries of the site.
- 1.4 St. George's Church Hall which is a Grade II Listed building adjoins the development site to the eastern boundary.
- 1.5 A large single storey scout headquarters building is located adjacent to the north west corner of the site.
- 1.6 Outline Permission under P/2336/11 for a redevelopment to provide 27 dwellings, open space and improved access was granted by planning committee on 10/02/2012.
- 1.7 Since planning permission P/2336/11 was granted, a number of conditions have been approved under planning references P/4533/15, P/1849/16 and P/2115/16 in relation to Boundary Treatments, Drainage, Underground Works, Carriageway Details and Construction Method Statement
- 1.8 A Reserved Matters Application (P/0479/15) in relation to design and appearance of the development was granted by committee on 04/09/2015.
- 1.9 A Section 106 Agreement was secured in relation to the development and was completed on the 8th February 2012.
- 1.10 Construction of the development has now begun on site.

2.0 PROPOSED DETAILS

- 2.1 Outline Planning permission was granted planning permission under P/2336/11 on the 10/02/2016, subject to a S.106 agreement.
- 2.2 A Planning Application relating to Reserved Matters for appearance and layout was granted on 04/09/2015
- 2.3 Planning Application P/3673/16 seeks permission to vary condition 1 attached to reserved matters application P/0479/15 to allow amendments to the approved

plans for an increased turning circle for refuse vehicles, an amendment to bedroom numbers from four bed to three bed and minor alterations to porch detailing.

- 2.4 The proposed amendment to the turning circle would result in an increase from 26m² to 47m²
- 2.5 The proposed amendment to the housing mix would relate to the eight units of Affordable and Shared Ownership housing and would result in 3 bed, 5 persons units in place of the approved 4 bed, 5 persons units.
- 2.6 The proposed amendments to the porch detailing relate to type 1, 2 and 3 houses, of which there are 14 units in total and would result in a change of material from concrete pillars to metal and canopy flashings to a GRP (glass reinforced plastic) material.

3.0 RELEVANT PLANNING HISTORY

P/2336/11

Outline permission for access and layout: redevelopment to provide 7 x 1 bed flats, 8 x 2 bed flats, 4 x 3 bed houses and 8 x 4 bed houses; provision of approximately 0.69 hectares of open space; improved access, parking for users of St George's Hall and a detached double garage for use by the vicarage.

Granted ; 10-Feb-12

Claim For A Judicial Review Dismissed 07/11/13

P/0479/15

Approval of reserved matters for appearance, landscaping and scale attached to outline planning permission P/2336/11 dated 10/02/12: redevelopment to provide 7 x 1 bed flats, 8 x 2 bed flats, 4 x 3 bed houses and 8 x 4 bed houses; provision of approximately 0.69 hectares of open space; improved access, parking for users of St George's Hall and a detached double garage for use by the vicarage.

Granted ; 04-Sept-15

4.0 CONSULTATION

- 4.1 Site Notices were erected on 20th October 2016, expiring on 10th November 2016.
- 4.2 Press Notice was advertised in the Harrow Times on the 20th October 2016, expiring on 10th November 2016.
- 4.3 The application was advertised as being within the setting of a listed building and a Major Development.
- 4.4 A total of 568 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 10th November 2016.

4.5 Adjoining Properties

Number of Letters Sent	568
Number of Responses Received	3
Number in Support	1
Number of Objections	2
Number of other Representations (neither objecting or supporting)	0

Details of Representation and date received	Summary of Comments	Officer Comments
<p>Ms Marion Garner-Patel Kingsfield Estate Residents' Action Group60 Kingsfield Avenue, Harrow HA2 6AS Date Received: 19/08/2016 & 01/11/2016</p>	<p>Objects to the application due to: The change in the number of bedrooms from the original scheme. It is hoped 4 bedroom rooms would be provided</p> <p>Rainwater and Drainage concerns</p> <p>A summer environmental study should have been provided</p> <p>Objection to increase in turning circle and loss of further open green space</p>	<p>This is addressed within section 6.5 of the report below.</p> <p>Drainage details have been approved as part of previous conditions. This was addressed under the substantive consent and subsequent discharge of conditions. This issue was dealt with under the outline permission application</p> <p>This is addressed in section 6.6.7 of the report below.</p>
<p>Ms Sandra-Lee Palmer 122 Pinner View Harrow, HA1 4RL Date Received: 07/09/2016</p>	<p>Objects to the application due to: The enlargement of the turning point would reduce the open space provision Concerns regarding impacts on the Scout Hall and the development in relation to proximity to Churchfield Close</p> <p>Concerns regarding drainage</p>	<p>This is addressed within section 6.6.7 of the report below</p> <p>This was addressed in the previous outline permission</p> <p>Drainage details have been approved as part of previous conditions. This was addressed under the substantive consent and subsequent discharge of conditions.</p>

Mr Robert Smith 120 Pinner View Harrow, HA1 4R Date received; 22/08/2016	Supports the Proposal: Support for the proposal due to the change in bedroom numbers reducing the impact on parking.	Number of occupants and car parking spaces will remain the same as previous approved permission.
---	---	--

4.6 Statutory and Non Statutory Consultation

4.7 The following consultations have been undertaken:

LBH Drainage
LBH Highways
LBH Sports and Culture
LBH Design
LBH Waste Officer
LBH Conservation Officer
LBH Tree Officer
Sports England
Environment Agency
Thames Water
Pinner Association
Designing Out Crime

4.8 External Consultation

4.9 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

Consultee	Summary of contents	Officer Comments
Sports England	No Response	Noted
Environment Agency	No Objection	Noted.
Thames Water	No Response	Noted
Pinner Association	No Response	
Designing Out Crime	No objections	Noted

4.10 Internal Consultation

4.11 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

Consultee	Summary of contents	Officer Comments
LBH Design	No Objection	Noted
LBH Highways	No Objection	Noted
LBH Drainage Team	No Objection	Noted
Harrow Sports & Culture	No Response	Noted
Conservation Officer	No Objection	Noted

5.0 POLICIES

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that: 'If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.'
- 5.2 The Government has issued the National Planning Policy Framework [NPPF] which consolidates national planning policy and is a material consideration in the determination of this application.
- 5.3 In this instance, the Development Plan comprises The London Plan 2016 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

6.0 APPRAISAL

- 6.1 The main issues are:-

Principle of the Development
Regeneration
EIA Development
Housing Supply, Density and Overall Housing Mix
Design, Character and Appearance of the Area
Residential Amenity
Trees & Development
Traffic, Parking, Access, Servicing and Sustainable Transport
Flood Risk and Development
Sustainability
Biodiversity

6.2 Principle of Development

- 6.2.1 Since the grant of the outline application P/2336/11, the Harrow Unitary Development Plan (2004) has been replaced with Local Development Framework (LDF). The LDF comprises The Harrow Core Strategy 2012, Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan (DMP) 2013, the Site Allocations Local Plan (SALP) 2013 and Harrow Local Area Map (LAP) 2013. The 2011 London Plan has also been replaced by the 2016 version.
- 6.2.2 The principle of the development has already been established through previous planning permissions for the site (P/2336/11 and P/0475/15). There are no additional policies within the Harrow Development Plan which would warrant a different conclusion in relation to the principle of development on site.

6.3 Regeneration

6.3.1 The London Borough of Harrow published a Regeneration Strategy for 2015 – 2026. The objective of this document is to deliver three core objectives over the plans life, which include;

- **Place;** Providing the homes, schools and infrastructure needed to meet the demands of our growing population and business base, with high quality town and district centres that attract business investment and foster community engagement;
- **Communities;** Creating new jobs, breaking down barriers to employment, tackling overcrowding and fuel poverty in our homes and working alongside other services to address health and welfare issues;
- **Business;** Reinforcing our commercial centres, promoting Harrow as an investment location, addressing skills shortages, and supporting new business start-ups, developing local supply chains through procurement.

6.3.2 Whilst it is acknowledged that the proposed development would not address all of the aspects noted in the above bullet points, it would achieve the overall aspiration of regeneration of the Borough. Currently, the site is underutilised, and not the most efficient use of the site. The proposed development allows the site to be used in a much more efficient way that would at least for the short term assist in providing employment for local trade workers during the construction process. Furthermore, the site would bring long term community benefits in the provision of public open space.

6.3.3 The proposed development would provide for housing within Harrow, whereby providing a much more attractive area to further promote growth into the area. It is therefore considered that the proposed development would meet the overarching principles of regeneration into the area.

6.4 Environmental Impact Assessment Development

6.4.1 A screening opinion was carried out under the original permission P/2336/11 which determined the development

6.4.2 Since the grant of planning permission P/2366/11, there has been a change to the EIA regulations (6 April 2015). The changes to the regulations, amongst other things, increased the size of site areas that would need to be screened. In this instance the application site is less than the 5.0ha threshold set by the amended EIA regulations. Accordingly, the application site would be less than the requirements of the amended EIA regulations and therefore still not an EIA development

6.4.3 Notwithstanding the above, a further EIA Screening for the current application has been carried out and it is considered that the application site is not an EIA Development

6.4.4 The Environment Agency has been consulted regarding the current application and has no objection.

6.5 Housing Supply, Density and Overall Housing Mix

6.5.1 Paragraph 49 of the NPPF reminds local planning authorities that housing applications should be considered in the context of the presumption in favour of sustainable development.

6.5.2 The mix of the proposed housing for the scheme was previously assessed under outline permission P/2336/11. Under this application it was considered that the proposing housing mix would be acceptable.

6.5.3 The following is a breakdown of the proposed housing mix across the scheme.

Unit Size	Approved, February 2012 (P/2336/11)		Proposed amendment (No change to P/2336/11)	
Total Dwelling Numbers	27		27	
Affordable	14		14	
Market	13		13	
Mix	Private	Affordable	Private	Affordable
1Bed 2 Person	5	2	5	2
2Bed 3 Person	4	2	4	2
2Bed 4 Person	0	4	0	4
3Bed 4 Person	0	0	0	0
3Bed 5 Person	0	0	2	6
4Bed 5 Person	2	6	0	0

6.5.4 As highlighted in the table above, the proposed amendment would relate to the substitution of the approved eight 4 bedroom 5 person units to eight 3 bedroom 5 person units. There would be no change to the number of the approved units, nor would there be a change in the occupancy of each unit, and as such would be acceptable and not materially change the approved scheme under P/2336/11.

6.5.5 Furthermore, the balance between affordable housing and market housing would not change since the approved scheme under P/2336/11 and as such would be satisfactory.

6.5.6 The amendment under the current application seeks to alter the eight 4 bedroom, 5 person units to 3 bedroom, 5 person units. An objection has been raised from an adjoining neighbour in relation to the proposed change in bedroom numbers. However, it is considered that the proposed change would not materially alter the approved application. The proposed amendments would still result in acceptable housing mix and furthermore would provide family size dwellings.

6.5.7 Harrow Council's Housing Department have been consulted as part of the application. The proposed amendment to the bedroom numbers have been reviewed by the housing department and it is considered that the amendment

sought would be supported.

- 6.5.8 It is considered that in terms of occupancy 3 bedroom 5 person units are in high demand in terms of affordable rented accommodation. Housing needs for the borough have changed since the original permission P/2336/11 and it is considered that 4 bedroom 5 person units are harder to allocate for. Therefore in this instance the proposed amendment to the previously approved 4 bedroom, 5 person units would be supported.
- 6.5.9 In addition to the current application a parallel application under reference P/3882/16 seeks to capture the above amendments to the bedroom numbers. The number of affordable homes would not change as a result of the proposed amendments. The mechanism to secure the above amendments through a modified S.106 agreement, would be consistent with the objective of maintaining the affordable housing output from the site, whilst reflecting the proposed amendments to the bedroom numbers of the affordable units. For these reasons, the proposed development would accord with the spatial development strategy for the borough set out in the Core Strategy, whereby providing a development within the borough that would be in a coherent, efficient and effective manner, according with National Planning Policy Framework 2012, policy 3.5A of The London Plan 2016 and policies CS1.A and CS1.B of the Harrow Core Strategy 2012.
- 6.5.10 The proposed development would therefore meet the strategic housing aim for the borough and accord with policy 3.13 of the London Plan (2016), Policy CS1.J of the Harrow Core Strategy, policies DM24 and DM50 of the Harrow Development Management Policies Local Plan (2013) and the Supplementary Planning Document: Planning Obligations and Affordable Housing (2013).

6.6 Design, Character and Appearance of the Area

- 6.6.1 The National Planning Policy Framework (NPPF) was published by the Government on March 27th 2012. The NPPF does not change the law in relation to planning (as the Localism Act 2012 does), but rather sets out the Government's planning policies for England and how these are expected to be applied. It remains the case that the Council is required to make decisions in accordance with the development plan for an area, unless other material considerations indicate otherwise (S.38(6) of the Planning Act). The development plan for Harrow comprises The London Plan 2016 [LP] and the Local Development Framework [LDF].
- 6.6.2 The London Plan (2016) policy 7.4B states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. Core Strategy policy CS1.B states that 'all development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design'. The NPPF and policy 7.8.C/D/E of The London Plan 2016 set out similar aims. Policy DM7 of the Harrow Development Management Local Policies Plan (2013)

provides further guidance on managing heritage assets and requires new development not to adversely affect the character or amenity of Conservation Areas, Listed Buildings or other heritage assets.

- 6.6.3 Policy DM1 of the DMP gives advice that “all development proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.”
- 6.6.4 The character and appearance of the development was previously considered under the reserved matters application P/0479/15. Within this application it was considered that the two storey nature of the development and the high quality brick detailing would result in a high quality and legible development. As such the proposed development would have an acceptable impact on the character of the surrounding area.
- 6.6.5 The current application seeks to vary the approved plans attached to the reserved matters application P/0479/15. The variation of the approved plans is to facilitate minor changes to material details on the front porches of house types 1, 2 and 3.
- 6.6.6 It is proposed to substitute the approved concrete columns for steel columns on the porch supports and provide GRP flashings for the top of porch roofs. It is considered that the change in material would be minor and would not unduly impact on the overall legibility and design of the approved scheme.

Variation to Turning Circle

- 6.6.7 An objection has been received in relation to the amendment to increase the size of the turning circle and its impact on the open space. The increase in the size of the turning circle is required to ensure that the development can function in regards to highway and public safety.
- 6.6.8 Drawing number 141552/AT/B01.1 shows the size difference between the approved turning circle and proposed amended turning circle. The amended turning would result in the loss of 20sqm of open space.
- 6.6.9 While it is noted that there would be a small loss of open space, it is considered that increase of turning circle would not unduly impact upon the function and use of the proposed public open space.
- 6.6.10 In terms of appearance, a condition was attached to P/2336/11 requiring the applicant to submit boundary treatments (condition 3) and a Landscape Management Plan (condition 19). These conditions were approved in writing by the local authority under planning reference P/4533/15.
- 6.6.11 Under the approval P/4533/15 a landscape drawing numbered 2553-SK-01 demonstrated that the turning circle would consist of a ‘reinforced grass turning area’ (i.e. grasscrete). The use of this material is considered to soften the appearance of the turning circle to ensure it would not impact on the

appearance of the turning circle.

- 6.6.12 A condition has been attached to this permission to ensure that the proposed enlarged turning circle consists of the approved reinforced grass for the turning area. Subject to this condition the proposed enlargement to the turning circle would have a satisfactory impact upon the open space.
- 6.6.13 The remainder of submitted ground surfacing materials are considered to be appropriate and would provide a high quality appearance within the area in terms of both the internal informal area and also adjacent to the public realm. Accordingly, it is considered that the proposed materials would achieve the intent of the condition imposed on the original permission (P/2336/11).

Conclusion:

- 6.6.14 Subject to the conditions mentioned above, it is considered that the external appearance and design of the buildings together with the proposed landscaping scheme are consistent with the principles of good design as required by the National Planning Policy Framework (2012). The resultant development would be appropriate in its context and would comply with policies 7.4B and 7.6B of The London Plan (2016), Core Policy CS1(B) of the Harrow Core Strategy, policy DM1 of the Council's Development Management Policies Local Plan and the Council's adopted Supplementary Planning Document – Residential Design Guide (2010), which require a high standard of design and layout in all development proposals.

6.7 Residential Amenity for Future Occupiers

- 6.7.1 London Plan Policy 3.5 *Quality and Design of Housing Developments* sets out a range of criteria for achieving good quality residential development. Part B of the policy deals with residential development at the neighbourhood scale; Part C addresses quality issues at the level of the individual dwelling.
- 6.7.2 Implementation of the policy is amplified by provisions within the Mayor's Housing SPG (2016). The amplification is extremely comprehensive and overlaps significantly with matters that are dealt with separately elsewhere in this report, particularly Lifetime Neighbourhoods. In response to a request for clarification about the detail internal arrangements of the proposed flats and houses the applicant has advised that the development has been designed to accord with the London Housing Design Guide. Furthermore, the Housing Standards Minor Alterations to the London Plan have now been adopted as at March 2016. Where relevant these are addressed in the appraisal below.
- 6.7.3 Core Strategy Policy CS1 K requires a high standard of residential design and layout consistent with the London Plan and associated guidance. Policies DM1 *Achieving a High Standard of Development* and DM27 *Amenity Space* set out a number of privacy and amenity criteria for the assessment of proposals for residential development.

- 6.7.4 The layout of the proposed dwellings were assessed under the outline permission P/2336/11 and reserve matters application P/0475/15. Under these applications it was deemed that the proposed development would provide accommodation that meets the Gross Internal Floor Areas as detailed within the London Plan (2016).
- 6.7.5 It was also considered that the proposed layouts would provide a functional living accommodation, with habitable rooms that would receive a satisfactory level of light and adequate outlook for future occupiers.
- 6.7.6 The proposed amendment to the approved plans for reserved matters application P/0475/15 seeks to alter the approved 4 bedroom units for the Type 1 Affordable Units to 3 Bedroom Units. It is considered that the proposed amendment would be satisfactory.
- 6.7.7 Each of the three bedrooms would remain acceptable in terms of minimum room sizes, outlook and privacy. Furthermore, the storage for the units would remain at an acceptable level as stipulated by the London Plan (2016).
- 6.7.8 Overall, it is considered that the amendments to the proposed bedroom layouts provided for the proposed type 1 dwellinghouses would be satisfactory in size, and each of them would provide acceptable layouts to ensure the habitable space is useable and functional.

Amenity space

- 6.7.9 Policy DM27 Amenity Space of the Development Management Policies Local Plan document states that the appropriate form and amount of amenity space should be informed by the Mayor's Housing Design Guide (i.e. the SPG) and criteria set out in the policy
- 6.7.10 There would be no change to the amenity spaces as a result of the proposed amendments to the bedrooms in the type 1 affordable houses. Furthermore, there is no proposed changes to the remainder of the approved dwellings as approved under planning applications P/2336/11 and P/0475/15.

6.8 Residential Amenity of Neighbouring Occupiers

- 6.8.1 London Plan Policy 7.6 Architecture states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 6.8.2 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DM1 *Achieving a High Standard of Development* sets out a number of privacy and amenity criteria for the assessment of the impact of development upon neighbouring occupiers. Harrow has also produced a Residential Design Guide SPD.

- 6.8.3 Policy 7.6B, subsection D, of The London Plan (2016) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 6.8.4 The layout of the development was assessed under the outline planning application P/2336/11. It was considered that the proposed development, by its two storey nature, would not result in having overbearing impacts in terms of the residential amenity of adjacent dwellinghouses.
- 6.8.5 Furthermore, there would be no changes to the footprint or height of the approved dwellings as a result of the proposed amendments under this current application. As such, the impact on residential amenity of neighbouring occupiers would be acceptable.

6.9 Trees and development

- 6.9.1 Planning permission P/2336/11 attached Condition 17 which required further details to be submitted to demonstrate how the trees located on site, that are subject to Tree Protection Orders, would be protected throughout and after the construction phase.
- 6.9.2 The applicant submitted an Arboricultural Report that detailed how the trees within the site, subject to Tree Protection Orders, would be protected throughout the construction phase. The detailed information was reviewed by the Council's Arboricultural Officer who considered that the information was satisfactory, and the mitigation measures proposed would ensure that the protected trees would not be damaged during construction works. As such Condition 17 was approved in writing by the local authority under planning application P/4533/15.
- 6.9.3 Notwithstanding the above, the proposal to amend the size of the turning circle would not impact upon any of the protected trees due to the location and separation of the turning circle in relation to protected trees on site.

6.10 Traffic, Parking, Access, Servicing and Sustainable Transport

- 6.10.1 The London Plan (2016) Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimize additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan (2016) which has been updated sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility.
- 6.10.2 Policy DM42 of the DMP gives advice that developments should make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access.
- 6.10.3 The Council's Highway Authority raised no objection to the previously approved application in terms of car parking levels or impacts on the free flow and safety of the public highway. Within this current scheme, there would be no change to

the provision of onsite parking.

- 6.10.4 The proposed amendments to the development would not result in an increase in residential units to the site, and as such would not result in an increase in car parking for the development.
- 6.10.5 Harrow Highways department have reviewed the proposed amendment to the revised turning circle and are satisfied that the amended layout would be satisfactory in terms of highway safety in regards to waste servicing and access for emergency vehicles.
- 6.10.6 In order to ensure that throughout the construction of the approved development of P/2336/11, a safeguarding condition was imposed to control the manner in which the construction would be undertaken. Condition 8 (Construction Method Statement), to be submitted to and approved in writing by the Local Planning Authority. Whilst it is acknowledged that the development impacts of the physical construction of the scheme would be temporary, a development of this scale may still have significant impacts on the amenity of the neighbouring occupiers and residents. The applicant submitted a Construction Method Statement to demonstrate how potential impacts on public amenity would be limited throughout the demolition and construction phase. This document was considered to satisfactorily demonstrate that any potential impacts on public amenity and the local transport network would be acceptable. Accordingly, Condition 8 (Construction Method Statement) was discharged under P/1849/16. Notwithstanding this, a condition is attached to ensure that the approved Construction Environmental Management Plan be implemented during the construction works on site and retained until the completion of the construction of the development.
- 6.10.7 Overall the proposed variation to the approved scheme would not noticeably intensify use of the site in terms of highway safety or parking. On this basis, it is considered that the proposed development would give rise to no conflict with the above stated policies.

6.11 Flood Risk and Development

- 6.11.1 Policy 5.13A of The London Plan (2016) and policy DM10 of the Harrow Development Management Policies Local Plan (2013) require development proposal to incorporate sustainable drainage system to ensure that surface water run-off and storage water from the development is managed close to the site as possible.
- 6.11.2 An objection has been raised in relation to the on site drainage and potential impact on neighbouring properties. The flood risk impacts were assessed under the outline planning permission P/2336/11. Under planning permission P/2336/11 it was determined that the development site had a low risk of flooding and a Flood Risk Assessment was submitted which included mitigation methods in relation to finished floor levels and sustainable Urban Drainage Systems.

6.11.3 Notwithstanding the above, conditions were attached to P/2336/11 requiring the applicant to submit details of sustainable urban drainage systems and sewage disposal details. Accordingly, Condition 12 (Sewage Disposal) and Condition 14 (drainage) were reviewed by the Drainage Authority, who considered that the proposed measures would ensure that the development would not result in an increase in flood risk to the area. As such, the submitted information met the intent of Conditions 12 and 14 of P/2336/11 with regard to flood risk and this condition was subsequently discharged under P/4533/15.

6.11.4 In conclusion, it is considered that the minor amendments to the housing mix, turning circle and porch detailing would not impact upon the flood risk and drainage of the proposed development.

6.12 Sustainable Development

6.12.1 Policy 5.1 of The London Plan seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent by 2025. Policy 5.2A/B of The London Plan (2016) sets out the 'lean, clean, green' approach to sustainability, which is expanded in London Plan policies 5.3A, 5.7B, 5.9B/C, 5.10C and 5.11A. Harrow Council has adopted a Supplementary Planning Document on Sustainable Building Design (adopted May 2009).

6.12.2 Whilst this Decision would be made after the 1st October whereby any major residential development would be required to meet zero carbon, the proposed development is already significantly progressed for the preparation of the build phase as such it would be unreasonable to enforce conditions in relation to carbon free development.

6.12.3 Notwithstanding the above, outline permission P/2336/11 required the applicant to submit details to be approved in writing by the local authority in relation to carbon dioxide emissions on site, as stipulated by Condition 5. As such it is necessary to re-attach such a condition. Furthermore, it is noted that Condition 5 of P/2336/11 was a pre-commencement condition. Therefore an appropriate time limit for the submission of such details to be approved has been attached to the current permission.

6.13 Bio-diversity

6.13.1 An objection has been raised in relation to the impact of bio-diversity on site. The outline application P/2336/11 assessed the impact of the development on biodiversity and concluded that the development would not unduly impact on bio-diversity.

6.13.2 Under planning application P/2336/11 an ecological report was submitted which was reviewed by the Council's bio-diversity officer and it was considered that the findings in this report would not be detrimental to locally important biodiversity.

6.13.3 Notwithstanding the above, the proposed amendments sought under the current application would not alter the conclusions of the original findings.

6.14 Conclusions

- 6.14.1 The proposed development would continue to provide new private and affordable homes, contributing to the delivery of new housing required by The London Plan (2016) and the Harrow Core Strategy (2012). The minor amendments in terms of the variations to the front porches would continue to provide a high quality development within both the application site and surrounding area. The revised turning circle would improve the highway safety and access for the proposed development whilst maintaining the functionality and appearance of the remaining open space. The revisions to the bedroom numbers would reflect the needs of Harrow's Housing requirements and whilst maintaining the mix of accommodation on site.

APPENDIX 1: Conditions and Informatives

1 Timing

The development shall be begun no later than two years from the date of the reserved matters application p/0475/15 dated 04/09/2015

Reason; to comply with the provisions of section 92 of the Town and Country planning Act 1990 (as amended)

2 Approved Plans and Documents

The development hereby permitted shall be carried out in accordance with following approved plans and documents: 580_P-200 Rev B; 581_P-601; 581_P-602; 581_P-603; 581_P-604; 581_P-605; 580_P002 Rev C; 580-P001 Rev C; 580_P003 Rev B; 580_P000; 580_P100 Rev B; 580_P-301, 580_P-300, 580_P-303, 580_P-401, 580_P-400, 580_P-501, 580_P-500, 580_P-103, 580_P-504 Rev B, 580_P-503 Rev C, 580_P-502 Rev C, 580_P-404 Rev C, 580_P-403 Rev D, 580_P-402 Rev D, 580_P-304 Rev B, 580_P-302 Rev F, 580_P-202 Rev D, 580_P-201 Rev G, 580_P-102 Rev D, 580_P-101 Rev G 580_P-004 Rev C, 2553_SK_01 580_P-105 Rev A, 141552/TA/BO1.1

Reason: For the avoidance of doubt and in the interests of proper planning.

3 Landscaping

The hard and soft landscaping shall be implemented in accordance with the details approved under P/4533/15 dated 09/06/2016. The development shall be carried out in accordance with the approved details.

Reason: To safeguard the appearance and character of the area, and to enhance the appearance of the development

4 Planting and Seeding

All planting, seeding or turfing comprised in the approved details of landscaping plans shall be carried out in the first planting and seeding seasons following the occupation of the building(s), or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 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 a similar size and species, unless the local authority agrees any variation in writing.

Reason: To safeguard the appearance and character of the area, and to enhance the appearance of the development

5 Turning Circle

The revised turning circle hereby approved shall consist of the approved 'reinforced grass turning area' as stated in the approved drawing 141552/AT/B01.1 attached to planning permission P/4533/15 dated 09/06/2016

Reason: To safeguard the appearance and character of the area, and to enhance the appearance of the development

6 Boundary Treatment

The boundary treatments shall be implemented in accordance with the details approved under P/4533/15 dated 09/06/2016. The development shall be carried out in accordance with the approved details and retained thereafter.

Reason: To safeguard the appearance and character of the area, and to enhance the appearance of the development

7 Drainage and Sewage

The disposal of sewage, surface water and surface water attenuation and storage works shall be implemented in accordance with the details approved under P/4533/15 dated 09/06/2016. The details as approved shall be retained in that form.

Reason: To prevent the increased risk of flooding, reduce and mitigate the effects of flood risk.

8 Junction Arrangements

The details in relation to the junction arrangements shall be implemented in accordance with the details approved under P/4533/15 dated 09/06/2016. The details as approved shall thereafter be retained.

Reason: To ensure the safety of the users of the highway.

9 Trees and Underground Works

The details in relation to Underground works and protection measures for trees shall be implemented in accordance with the details approved under P/4533/15 dated 09/06/2016. The details approved shall thereafter be retained.

Reason: To safeguard any trees of amenity value and mitigate the impact of development on local ecology.

10 Construction Method Statement

The details in relation to the Construction Method Statement shall be implemented in accordance with the details approved under P/1849/16 dated 16/06/2016. The details approved shall thereafter be retained.

Reason: To manage the impact of the development upon the local area during its construction in the interests of public amenity and local natural environment.

11 Levels

The details in relation to the levels of the buildings, roads and footpaths in relation to the adjoining land and highway and other changes proposed in the levels of the site shall be implemented in accordance with the details approved under P/2078/16 dated 08/07/2016 and thereafter retained.

Reason: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties

12 Carriageway Works

The details in relation to the base course and levels of the carriageways shall be implemented in accordance with the details approved under P/2115/16 dated 06/07/2016 and thereafter shall be retained.

Reason: To ensure that the traffic generated by the building operations will not interfere with the free flow of traffic on the public highway and that the road and footway shall be of an adequate specification for anticipated traffic

13 Accessible and Adaptable Homes

The residential units hereby permitted shall be constructed to the specifications of: "Part M, M4 (2), Category 2: Accessible and Adaptable Dwellings" of the Building Regulations 2013 and thereafter retained in that form.

Reason: To ensure that the development is capable of meeting 'Accessible and Adaptable Dwellings' standards.

14 Waste and Refuse Arrangements

The development hereby permitted shall not be occupied until a scheme for the storage and disposal of refuse/ waste has been submitted to, and approved in writing by, the local planning authority. The development shall not be occupied or used until the works have been completed in accordance with the approved details and shall thereafter be retained.

Reason: To ensure adequate standards of hygiene and refuse / waste collection without prejudice to the enjoyment by neighbouring occupiers of their properties.

15 Car Parking

Prior to the occupation of the development detailed drawings showing the levels; precise siting, materials to be used and marking out of the car parking areas hereby approved shall be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details before the development hereby approved is occupied.

Reason: To ensure that the visual appearance of the parking areas is acceptable and that the parking areas are appropriate and safe in respect of their function.

16 Permitted Development Restriction

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, D and F in Part 1 of Schedule 2 to that Order shall be carried out in relation to the dwellinghouse 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.

17 Secure by Design

Prior to occupation of the development hereby permitted, measures to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of the application site / development shall be installed in accordance with details to be submitted to and approved in writing by the local planning authority. Any such measures should follow the design principles set out in the relevant Design Guides on the Secured by Design website: <http://www.securedbydesign.com/guides/index.aspx> and shall include the following requirements:

1. all main entrance door sets to individual dwellings and communal entrance door sets shall be made secure to standards, independently certified, set out in BS PAS 24-1:1999 'Security standard for domestic door sets';
2. all window sets on the ground floor of the development and those adjacent to flat roofs or large rainwater pipes (downpipes), balcony pole supports, shall be made secure to standards, independently certified, set out in BS.7950 'Security standard for domestic window sets'.

Following implementation the works shall thereafter be retained.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime.

18 Sustainability and Energy

The development hereby permitted shall not commence beyond DCP Level until within 3 Months of the date of the permission hereby permitted details of a scheme aiming to achieve a reduction in carbon dioxide emissions of 25% or such percentage which is feasible from on-site renewable energy generation and low carbon technologies shall be submitted, and approved in writing by the local planning authority. The development shall be completed in accordance with the approved details before any part of the development is first occupied and shall thereafter be retained

Reason: To ensure the delivery of a sustainable development

19 External Lighting

The development hereby approved shall not be occupied until details of the external lighting for the development has been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details before the development hereby approved is first brought into use or is occupied.

Reason: To ensure the proposed lighting will not cause unacceptable levels of light pollution to the detriment of the amenities of neighbouring occupiers.

20 Bat Boxes

Prior to first occupation of the development hereby approved, details of bat boxes to be provided within the site shall be submitted to, and approved in writing by the Local Planning Authority. The bat boxes shall be installed in accordance with the approved details, and shall be retained as such thereafter.

Reason: To compensate for any potential loss of foraging habitat arising from the development site

Informatives

1 Policies

The following policies and guidance are relevant to this decision:

National Planning Policy and Guidance:

National Planning Policy Framework (2012)

The London Plan (2016):

- 2.13 Opportunity Areas and Intensification Areas
- 3.1 Ensuring Equal Life Chances for All
- 3.3 Increasing Housing Supply
- 3.4 Optimising Housing Potential
- 3.5 Quality and Design of Housing Developments
- 3.8 Housing Choice
- 3.9 Mixed and Balanced Communities
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 6.3 Assessing Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.12 Road Network Capacity
- 6.13 Parking
- 7.1 Building London's Neighbourhoods and Communities
- 7.2 An Inclusive Environment
- 7.3 Designing Out Crime
- 7.4 Local Character
- 7.5 Public Realm
- 7.6 Architecture

7.8 Heritage Assets and Archaeology

Local Development Framework

Harrow Core Strategy 2012

CS1 Overarching Policy

CS2 Harrow and Wealdstone

Development Management Policies Local Plan 2013

DM1 Achieving a High Standard of Development

DM2 Achieving Lifetime Neighbourhoods

DM12 Sustainable Design and Layout

DM45 Waste Management

Supplementary Planning Documents

Mayors Supplementary Planning Guidance: Housing (2016)

Harrow Supplementary Planning Document: Residential Design Guide 2010

Harrow Supplementary Planning Document: Planning Obligations 2013

2 Grant Without Pre-Application Advice

Statement under Article 31 (1)(cc) of The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended)"

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

3 Considerate Contractor Code Of Practice

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising any adverse effects arising from building operations, and in particular the limitations on hours of working.

4 Party Wall Act:

The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building

work which involves:

1. work on an existing wall shared with another property;
 2. building on the boundary with a neighbouring property;
 3. excavating near a neighbouring building,
- and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or

building regulations approval.

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering

Also available for download from the CLG website:
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>
Tel: 0870 1226 236 Fax: 0870 1226 237
Textphone: 0870 1207 405
E-mail: communities@twoten.com

5 Compliance With Planning Conditions

IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval

of Details Before Development Commences

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
- Beginning development in breach of a planning condition will invalidate your planning permission.
- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

6 Sustainable Urban Drainage

The applicant is advised that 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, 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 soak ways 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 (2012) 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 (2012) 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. The applicant can contact Harrow Drainage Section for further information.

7 Request To Remove Site Notice

A yellow Site Notice relating to this planning application describing the development and alerting interested parties of the development has been placed in the vicinity of the application site. You should now REMOVE this Site Notice.

8 Liability For Damage To Highway

The applicant is advised to ensure that the highway is not interfered with or obstructed at any time during the execution of any works on land adjacent to a highway. The applicant is liable for any damage caused to any footway, footpath, grass verge, vehicle crossing, carriageway or highway asset. Please report any damage to nrswa@harrow.gov.uk or telephone 020 8424 1884 where assistance with the repair of the damage is available, at the applicant's expense. Failure to report any damage could result in a charge being levied against the property.

APPENDIX 2: SITE PLAN



APPENDIX 3: PLANS AND ELEVATIONS



APPENDIX 4: SITE PHOTOGRAPHS





This page has been left intentionally blank