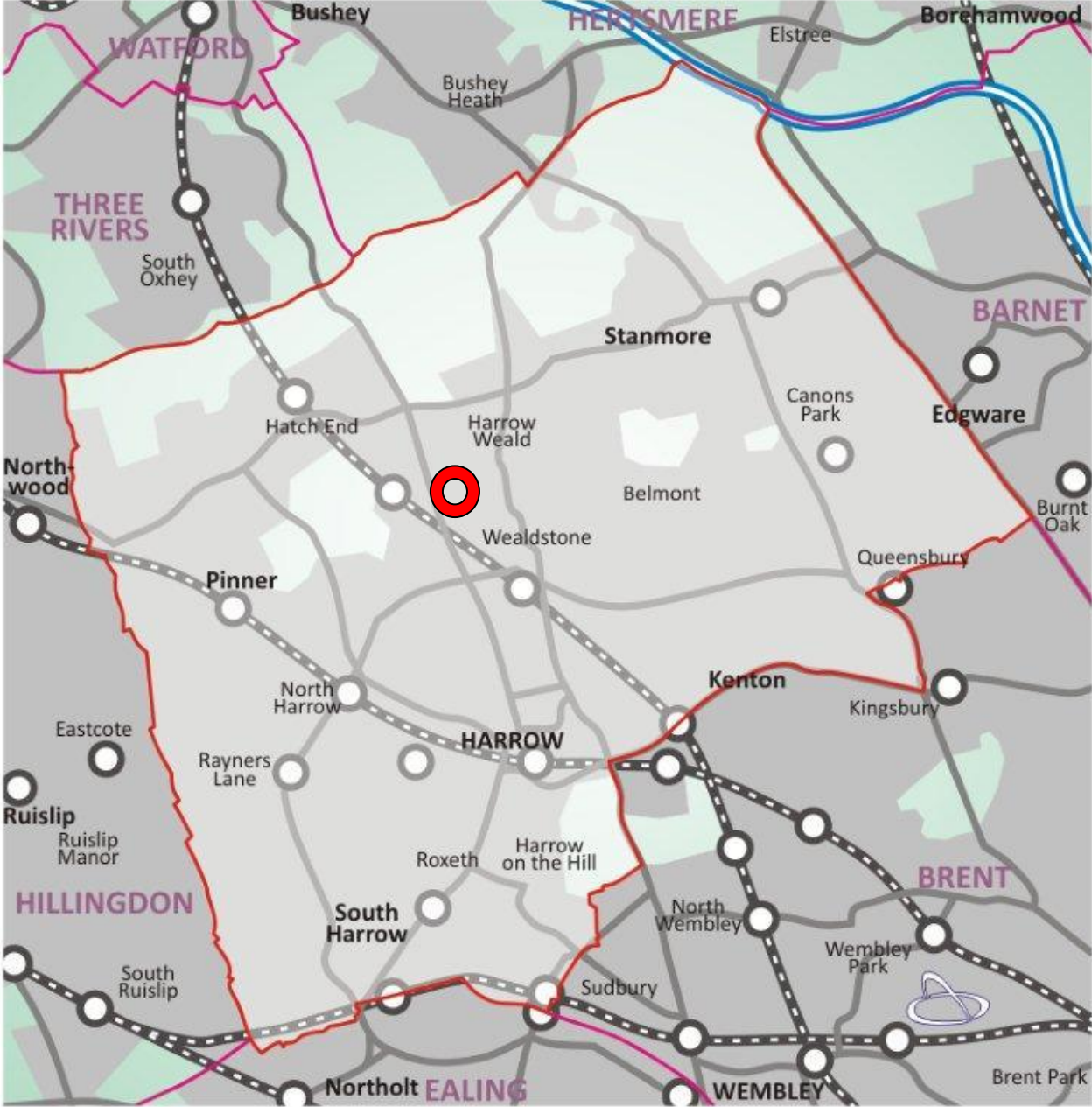
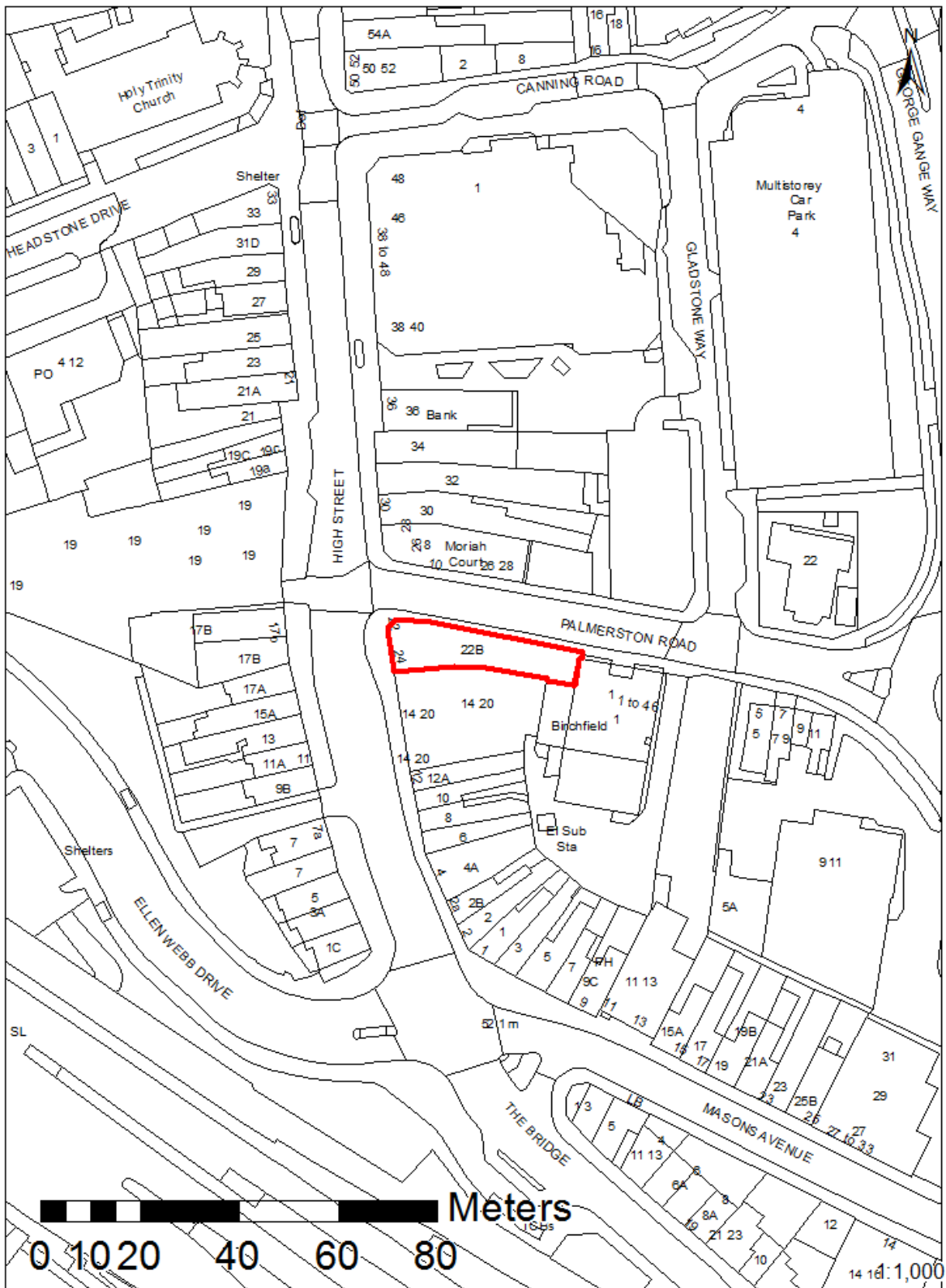


 = application site



22-24 High Street, HA3 7AA	P/4474/18
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22-24 High Street HA3 7AA



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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

17th April 2019

APPLICATION NUMBER: P/4474/18
VALIDATE DATE: 15/11/2018
LOCATION: 22-24 HIGH STREET, HIGH STREET, HA3 7AA,
WEALDSTONE
WARD: MARLBOROUGH
POSTCODE: HA3 7AA
APPLICANT: MARCHMONT DEVELOPMENTS LIMITED
AGENT: MARCHMONT CHARTERED SURVEYORS
HAMPTONS
CASE OFFICER: FIDEL MILLER
EXPIRY DATE: 27/02/2019

PROPOSAL

First floor rear extension, creation of 2nd and 3rd floors at rear comprising of 4 flats (3 x 1 bed 1 x 2 bed), bin and cycle stores.

RECOMMENDATION A

The Planning Committee is asked to:

GRANT planning permission for the reasons set out below:

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

Heads of Terms for the Legal Agreement

- i. Restriction of parking permits for future occupiers.
- ii. Legal Fees: Payment of Harrow Council's reasonable costs in the preparation of the legal agreement;

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 17th October 2019, or as such extended period as may be agreed by the Interim Chief Planning Officer in consultation with the Chair of the Planning Committee, then it is recommended to delegate the decision to REFUSE planning permission to the Chief Planning Officer on the grounds that:

The proposed development, in the absence of a legal agreement to provide appropriate mitigation measures to ensure the development would not exacerbate on street parking concerns of the proposed development, would fail to comply with the requirements of policies 6.9 of The London Plan 2016, Policy DM42 of the Harrow Development Management Policies Local Plan (2013), and policy CS1.R of the Harrow Core Strategy 2012.

REASON

The proposed development of the site would provide a quality development comprising of a satisfactory level of residential accommodation, thereby contributing to the Borough's housing stock. The housing development would be appropriate in terms of material presence, attractive streetscape, and good routes, access and make a contribution to the local area, in terms of quality and character.

The decision to GRANT planning permission has been taken having regard to the National Planning Policy Framework 2018, the policies and proposals in The London Plan 2016, the Harrow Core Strategy 2012 and the Development Management Policies Local Plan 2013, and to all relevant material considerations, and any comments received in response to publicity and consultation.

INFORMATION

This application is reported to Planning Committee as the development would be for 4 new residential units and therefore falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	(E)13. Minor Developments
Council Interest:	None
Floor Area:	394sqm
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£34,558 (based on a £60 contribution per square metre of additional floorspace)
Local CIL requirement:	£65,942 (based on a £110 contribution per square metre of additional floorspace)

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.

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	22-24 High Street, High Street, Wealdstone, Harrow, HA3 7AA
Applicant	Marchmont Developments Limited
Ward	Marlborough
Local Plan allocation	No
Conservation Area	No
Listed Building	No
Setting of Listed Building	No
Building of Local Interest	No
Tree Preservation Order	No
Other	Primary Shopping Centre, Secondary Shopping Frontage within Wealdstone Town Centre

1. SITE DESCRIPTION

- 1.1. The site consists of a part two storey and part three storey building located on the corner of Palmerston Road and High Street Wealdstone. The relevant section of the application site is above the rear two storey element along the application site's Palmerston Road frontage. The site is located with the Primary Shopping Centre within Wealdstone Town Centre. The section of the application site that fronts onto High Street Wealdstone is a Secondary Shopping Frontage.
- 1.2. The site contains a ground floor and first floor retail unit, currently operating as a Specsavers at ground floor level in A1 use class. Planning permission was granted under application P/3749/17 for the change of use of the first floor to a residential unit however this has not been implemented.
- 1.3. There are 2 existing flats on the second floor, which are held separately on a long term lease. The first floor was originally part residential and part ancillary to the retail unit; before the use was changed in the 1950's to a showroom and has been in ancillary retail use since then.
- 1.4. The attached neighbour to the south is No. 14-20 'Alder Brook' on the High Street which is a five storey building, with the top floor set back from High Street, with purpose- built flats on the upper floors and a Sainsbury's at the ground floor level. Historic plans reference P/1578/04/CFU for the redevelopment of this site show that the setback 5th floor does not have any habitable windows facing west towards High Street Wealdstone.

- 1.5. Across the junction of Palmerston Road to the north is No. 26-28 High Street, which is a three storey building with retail on the ground floor and a distinctive corner tower feature and a number of dormers facing south in the direction of Palmerston Road, with the neighbour beyond this at No. 30 at four storeys.
- 1.6. The neighbouring building to the rear/ east of the application site on Palmerston Road is 'Birchfield', is a 5 storey flatted development approved as part of application P/1578/04/CFU.
- 1.7. The site is identified within fluvial flood zone 2 and 3 according to Environment Agency flood maps and also the access to the site i.e. from 'High Street' and 'Palmerston Road' are identified within fluvial flood zone 2 and 3 plus surface water flood zone 3a and 3b according to our surface water flood maps. The site is at a highest risk of flooding.
- 1.8. The PTAL level is 6a which is very high and there are very good transport links in a close vicinity of the site.

2. PROPOSAL

- 2.1. The proposal would involve the refurbishment of the existing two-storey section along its Palmerston Road frontage and extension to create three floors of residential accommodation, above the existing ground floor storage and plant facilities including, conversion of the first-floor to residential and construction of two new storeys above to form 3x self-contained one-bedroom flats and a 1x self-contained two bedroom flat with associated refuse storage and secure bicycle storage.
- 2.2. The flats would be accessed from Palmerston Road along the application site's northern aspect. There is currently no access point along this elevation. There would be a separate entrance for the cycle store and refuse area for the flats respectively. The retail unit would remain entirely separate with its own entrance on its High Street frontage and side entrance.
- 2.3. In addition permission is also sought to convert the first floor from its current ancillary use to C3 residential use. This would involve the raising of the parapet wall fronting Palmerston Road and the installation of a flat roof to create a residential unit in that section.
- 2.4. The front ground floor of the premises is currently designated as A1 retail space and would not be affected by the proposal. The rear ground floor section along with the secure bin and bicycle storage for the units being constructed under the full planning consent P/3749/17 will be retained, extended and reconfigured to include a ground floor access to the proposed new upper parts, a self-contained plant room and separate bicycle and bin storage facilities.

2.5. The new units would consist of the following:

- 1F: 1 x 2b 3p flat
- 1F: 1 x 1b 2p flat
- 2F: 1 x 1b 2p flat
- 4F: 1 x 1b 2p flat

3. RELEVANT PLANNING HISTORY

- HAR/7910/B - Use of 1st floor as a showroom Granted: 01/01/1959
-
- LBH/27229 – Change of use of ground floor to restaurant and takeaway with ancillary accommodation on the 1st floor and conversion of 2nd floor into 2 flats Granted: 18/04/1985
-
- P/3749/17 - Change of use of first floor from retail (class A1) to two flats (class C3); creation of third and fourth floor to provide three flats; refuse and cycle storage. Granted subject to legal agreement: 26/11/2017

4. CONSULTATION

4.1. A total of 66 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 06th December 2018.

4.2. Adjoining Properties

Number of letters Sent	66
Number of Responses Received	1
Number in Support	0
Number of Objections	1
Number of other Representations (neither objecting or supporting)	0

4.3. A summary of the responses received along with the Officer comments are set out below:

Details of Representation	Summary of Comments	Officer Comments
12 Birchfield, 1 Palmerston Road, Wealdstone, HA3 7HB	<p>Objects to the application due to:</p> <ul style="list-style-type: none"> • Potential loss of access to natural daylight and sunlight, overlooking, loss of privacy, overbearing, visual obtrusion. 	Issues relating to the impact on the residential amenity of neighbouring occupiers are addressed in section 6.5 of this report.

4.4. Statutory and Non Statutory Consultation

4.5. External Consultation

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

Summary of Comments	Officer Comments
Met Police Designing Out Crime Officers: No objection to the proposal. However, a standardised 'Secure by Design' condition, which requires Secure by Design accreditation to be obtained prior to occupation of the development is recommended.	A condition has been attached as recommended.

4.7. Internal Consultation

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

Summary of Comments	Officer Comments
<p>Design Officer: No objection to the proposal, subject to the following changes:</p> <ul style="list-style-type: none"> - More details demonstrating material palettes, window thresholds, fire strategy. - Use of exposed brick instead of render and emulate clever 'patchwork' qualities of existing brick pattern. - Entrance to flats on Palmerstone Road better defined e.g. deepen 	Comments noted and are addressed in the relevant sections of the report below.

<p>brick reveal, widen opening/ glazing to entrance lobby.</p> <ul style="list-style-type: none"> - Introduction of perforated/hit and miss brick work to waste, recycling and bike store to allow for natural ventilation and a more interesting ground floor façade treatment. - A well thought out fire strategy. - Introduction of an ensuite bathroom to main bedroom of the proposed 2b3p flat on first floor. - Regularisation of size and arrangement of window openings, details of window types should be submitted. We would reject UPVC and opt for a more sustainable, higher quality material. - Ensure bicycle ramp has adequate fall for ease of parking. - Incorporation of inset balconies. - Planting could be introduced to flat roof notches on second and third floors for visual amenity. - Opportunity to encourage green wall/trellises to blank windowless façade. 	
<p>Planning Policy Officer: It is disappointing that there is more loss of employment floorspace at the site. However, it would appear necessary to enable the servicing of the flats above. The retail floorspace would still nonetheless provide for circa 150sqm, and if this is sufficient to ensure the continued operations/serving of the unit, then this is acceptable in this case. Subject to this, planning policy would not object to the scheme.</p>	<p>Comments noted and are addressed in the relevant sections of the report below.</p>
<p>LBH Highways: PTAL level 6A meaning that access to public transport is considered to be excellent. In compliance with AAP19 parking permit restriction to be applied via s106 agreement to prevent future occupiers from obtaining any parking permits for the surrounding CPZ. Proposed cycle parking acceptable. A Pre-commencement condition for a construction logistics/traffic management statement is required.</p>	<p>Comments noted and are addressed in the relevant sections of the report below.</p>

Drainage Engineering Officers: No objection to the proposal in principle. The emergency planning information details with the safe evacuation route plus surface water flood data submitted are acceptable.	Comments noted and are addressed in the relevant sections of the report below.
Waste Management Officers: No objection to the proposal.	Comments noted and are addressed in the relevant section of the report below.

5. POLICIES

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:
- 5.2. '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.'
- 5.3. 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.
- 5.4. 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].
- 5.5. While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2017), as this will eventually replace the current London Plan (2016) when adopted and forms part of the development plan for the Borough.
- 5.6. The document was published in draft form in December 2017 and is currently in the Examination in Public (EiP) stage, with the Panel's report expected in Autumn 2019. Given that the draft Plan is in the EiP stage of the formal process it holds some weight in the determination of planning applications, although lesser weight will be given to those areas of the plan that are being challenged through the EiP process (including any potential inconsistencies with the NPPF).
- 5.7. A full list of all the policies used in the consideration of this application is provided as Informative 1 in Appendix 1 of this report.

6. ASSESSMENT

6.1. The main issues are;

- Principle of the Development
- Character and Appearance
- Amenity of Neighbouring Occupiers
- Amenity of Future Occupiers
- Traffic and Parking
- Development and Flood Risk
- Secure by design issues
- Section 106 Agreement

6.2. Principle of Development

Protection of Ground Floor Retail Unit

6.3. The application site is located with a primary shopping area, High street facing frontage forms part of the secondary shopping frontage within Wealdstone Town Centre. As a result the development should comply with AAP Policy 17 which applies to Primary shopping Areas in Wealdstone Centre and D37 of the Harrow DM Policies which applies secondary Shopping Frontages. The proposal would result in the reduction of the ground floor space to 154sqm. It is considered that this would be of sufficient size to be a viable retail unit and the ground floor retail unit would not be out of keeping with the wider area. While the scheme will result in more intensive use of the site, the new residential units would have separate resident entrances and refuse storage areas and so would not impair the retail unit. On this basis it would comply with the policies as highlighted above.

Character and Appearance of the Area

6.4. The NPPF states (paragraph 130) that 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions,' The NPPF advocates the importance of good design though it is notable that the idea of 'design-led' development has not been carried through from previous national policy guidance to the National Planning Policy Framework.

6.5. The London Plan (2016) policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan 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. The London Plan policy 7.6B states, inter alia, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities

and land uses and meet the principles of inclusive design. The ethos of these principles are carried over in the draft London Plan policies D1 and D2.

- 6.6. Core Policy CS1.B specifies 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; extensions should respect their host building.'
- 6.7. Policy DM1 of the DMP seeks to ensure that "proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted".
- 6.8. The Harrow and Wealdstone Area Action Plan seeks to improve the image of Wealdstone town centre through selective redevelopment of underused gap and corner sites.
- 6.9. Paragraph 4.4 of the adopted Residential Design Guide SPD states that: "The pattern of development refers to the arrangement of plots, buildings and spaces around the building which, repeated over an area, forms part of that area's character and identity." Paragraph 4.5 states that the pattern of development plays a vital role in defining the character of the street and influencing the perception of spaciousness and landscape capacity.

Scale and Bulk

- 6.10. The application site relates to the rear/ eastern section of the corner site at the intersection of Wealdstone High Street and Palmerston Road. This application relates solely to the rear section of the property fronting onto Palmerston Road. The proposal would involve the construction of two additional storeys to create two residential units. The height of the parapet wall would be increased by 0.75m and the installation of a flat roof to contain a residential unit at the upper first floor level. The building would be lower than the neighbouring flats (Birchfield) which also has residential accommodation at the upper floors. The north-western corner of the proposed third storey would be set in from the north and west to create a flat roofed section above the second storey. The second and third storeys will also be set in on their south eastern corners creating a flat roofed area above the first floor storey.
- 6.11. It is considered that the proposed increase in height of the parapet wall and two additional storeys adjacent to the Birchfield flats would be acceptable as it will remain a subordinate addition to the subject property within its setting.
- 6.12. In a wider context the properties on the opposite side of Palmerston Road would be of a similar height to the proposal. The proposal would also be comparable in character to the existing corner block fronting High Street Wealdstone. Moreover plans submitted indicates that the applicant intends to build out the two additional storeys and mansard roof approved under application P/3749/18 simultaneously with the scheme considered under this application. In this context it is considered that the proposed additional storeys along the Palmerston Road elevation would

be subordinate to the said scheme and would therefore be sympathetic to the rhythm and pattern of development within the street scene.

- 6.13. The allocated site opposite is currently being redeveloped. The building is of a similar height, but much larger in area than the current proposal. It is not considered that the proposal would have a harmful impact on the development of this allocated site. While the building to the north of the application site, across the junction with Palmerston Road, at No.26-28 High Street is only 3 storeys, the neighbour beyond this at No.30 is 4 storeys, with a gabled roof above this. The Council's Design officer has reviewed the scheme and made the following comments 'Height and massing of the proposed densification is acceptable in principle'. Overall then, the proposal could be supported by officers in terms of scale and bulk.
- 6.14. The proposals would therefore comply with the high design aspirations of the National Planning Policy Framework 2018, Policies 7.4B and 7.6B of The London Plan (2016), Core Policy CS1.B of the Harrow Core Strategy (2012), Policy DM1 of the Harrow Development Management Policies Local Plan (2013), Policy AAP4 of the Harrow Council Area Action Plan and the adopted Supplementary Planning Document: Residential Design Guide (2010).

Design and Materials

- 6.15. In terms of materiality, the brickwork at ground floor level would match the existing. The proposal would involve the introduction of a main entrance lobby and entrance to the bicycle storage area and waste and recycling area.
- 6.16. The Council's Design Officer has indicated that the ground floor elevation would benefit from natural ventilation to the refuse/recycling and bicycle storage area which could be achieved by introducing perforated/ hit and miss brickwork to allow for air circulation and a more interesting ground floor façade treatment. Notwithstanding the drawings submitted a condition has been attached to this effect.
- 6.17. The first second and third floors would feature white render however the Council's Design Officer has indicated that exposed brick instead of white render would be more desirable. Notwithstanding the drawings submitted a condition has been attached to this effect. Following the Council's Design Officer's comments at pre-application stage the applicant has attempted to arrange the size and position of fenestration. However the Council would require details of window types to be submitted prior to commencement; a more sustainable, higher quality material than UPVC should be used. For the reasons outlined above a condition has been attached.
- 6.18. In terms of roof design, there is a wide variety of roof forms in the immediate area and so there is not an existing pattern that could be followed. The proposed flat roof of the proposed two storey element would be subordinate in its setting especially when compared to the additions to the corner block approved under application P/3749/1 to the east, 1 Palmerston Road (Birchfield) to the west, nos. 26 and 28 to the north which are lower in height than the proposal and features a number of smaller dormers to the upper floors.

- 6.19. It is considered that the proposed layout, bulk, scale and height of the proposed development would not result in an unacceptable impact on the character and appearance of the existing site, streetscene, or wider area. Subject to planning conditions, the proposed materials are considered acceptable in principle.
- 6.20. The development should be secured by design accreditation and a condition has been attached to this effect.

Landscaping

- 6.21. Whilst there is limited scope for soft landscaping, policy DM22 seeks that proposals include hard and soft landscaping. However, given the existing site constraints it is not considered that the site could provide any meaningful form of landscaping. It is therefore considered that in this case the hard landscaping as retained would be acceptable. The use of the first and second floor flat roof areas for planting and the introduction of trellising would not be practical due to the small areas and the lack of access to maintain the planting.

7. Housing Supply, Mix and Density

- 7.1. The NPPF encourages the effective use of land through the reuse of suitably located previously developed land and buildings. London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. 6.4.2 London Plan Policy 3.4 Optimising Housing Potential seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. The application site area is 0.03 hectares and it has a public transport accessibility level (PTAL) score of 6a indicating a very good level of public transport accessibility. Within the definitions of the London Plan density matrix, the site is considered to have an urban setting. The proposed units and habitable room densities fall well within the overall matrix ranges for urban setting sites.
- 7.2. Policy DM24 of the Harrow DM Policies requires an appropriate mix of residential unit sizes. The proposal would comprise 2 units in the additional floors (2nd and 3rd) and 2 units on the first floor level, creating a total of 4 new units, 3 of which would be 1 bed and the remaining unit being a 2 bed. In this type of town centre environment, this would be considered an appropriate housing mix and so would accord with policy DM24.

Room Size and Layout

- 7.3. The Technical Housing standards (2015) (THS) specifies Gross Internal Areas (GIA) for new dwellings, and footnote 57 of the London Plan explains that 'new dwellings in this context includes new build, conversions and changes of use.' A minimum ceiling height of 2.3m is provided for at least 75% of the dwelling area, and from the proposed cross section the application would be above this standard at 2.5m.

London policy 3.5 table 3.3

Flat no.	Room	Proposed Floor Area (m ²)	Minimum Floor Area Required (m ²)
1F: 2b 3p flat	Bedroom (single)	10.1	7.5
	Bedroom (double)	14.3	11.5
	Internal Storage	0	2
	Total GIA	65	61
1F: 1b 2p flat	Bedroom (double)	16.8	11.5
	Internal Storage	0	2
	Total GIA	62	50
2F: 1b 2p flat	Bedroom (double)	18.3	11.5
	Internal Storage	0	2
	Total GIA	58	50
3F: 1b 2p flat	Bedroom (double)	18.3	11.5
	Internal Storage	0	2
	Total GIA	58	50

- 7.4. The submitted drawings show that the proposed layouts would make acceptable provision for the accommodation of furniture and flexibility in the arrangement of bedroom furniture.
- 7.5. The GIA for all the proposed new units and habitable bedrooms would meet the minimum space standards required. Internal storage is shown on the plans and would also meet the London Plan 2016 thresholds, as such, it is considered that the proposed units would provide a reasonable standard of living for occupiers, contrary to policies DM1 and DM26 of the Development Management Policies Document (2013).

Floor to Ceiling Heights

- 7.6. The London Plan Housing Standards (March 2016) calls for a minimum floor to ceiling height of 2.3 metres across 75% of the GIA of a dwelling. The proposed plans (Sections) indicate that the proposal would achieve a floor to ceiling height of over 2.5m throughout the building. The proposed layouts would provide a satisfactory level of accommodation for future occupiers. As such, the floors to ceiling heights are considered acceptable in this instance.

Layout & stacking

- 7.7. Paragraph 4.55 of the Residential Design Guide SPD specifies that ‘the vertical stacking of rooms between flats should ensure that bedrooms do not overlap living rooms, kitchens and bathrooms on other floors. Where possible, the horizontal arrangement of rooms between flats in a block should also avoid bedrooms adjoining neighbouring living rooms, kitchens and bathrooms, as well as communal areas such as halls and stairs’. Further to this the SPG seeks to limit the transmission of noise from lifts and communal spaces to sensitive rooms through careful attention to the layout of dwellings and the location of lifts. The SPG also recognises the importance of layout in achieving acoustic privacy. Both of these points are picked up by Policy DM1 Achieving a High Standard of Development which undertakes to assess amenity having regard to the adequacy of the internal layout in relation to the needs of future occupiers and, at paragraph 2.15 of the reasoned justification, echoes the SPG position on noise and internal layout.
- 7.8. It is noted that the proposed floor plans generally provide vertical stacking that is considered to be satisfactory; there is an instance where living room to the second floor flat is partially placed above first floor bedroom. However, since there is only a small degree of overlapping, this is not considered to constitute a reason for refusal. Accordingly, it is considered that the vertical stacking between the proposed units would meet this requirement, and would therefore not give rise to unacceptable living conditions for future occupiers of the units.

Dual Aspect

- 7.9. All proposed units would be dual aspect, facing north and south. Moreover the submitted daylight and sunlight assessment indicates that the future occupiers of the subject property would have sufficient access to natural daylight and sunlight. On this basis, it is therefore considered that the proposal would provide a satisfactory level of outlook and light for the habitable rooms, and as such would not have an unacceptable impact on the future occupiers of this unit.

8. Privacy

- 8.1. The proposed site is situated within a town centre, urban location of medium rise buildings. The proposed habitable windows would be distributed between the north and south facing elevations with the exception of the second and third floor east facing bathroom window openings. The north facing fenestration fronts onto Palmerston Road and while the fenestration on the southern elevation would create a level of inter-visibility with the west facing window openings to Birchfield and the window openings on the rear elevations of nos14 to 20 and 4 – 12 High Street. Although there would exist a separation distance of 1.6m away at first floor level and 3.4m at second and third between the proposed fenestration on the southern elevation and the window openings on Birchfield they would be positioned at a perpendicular angle which would preclude unacceptable loss of privacy. Moreover these windows are small and non-opening below 2m thereby providing little opportunity for overlooking and loss of privacy. For the reasons

outlined above the proposed development would not have an adverse impact on the privacy of neighbouring occupiers.

Outdoor Amenity space

- 8.2. 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.
- 8.3. In terms of private outdoor amenity space, the SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1m² for each additional occupant. However the applicant has not proposed private amenity space for future occupiers.
- 8.4. Policy states that amenity space should have regard to the likely needs of future occupiers and the character and appearance of existing development in the area. It is not considered that on this type of building, a balcony would be considered part of the existing pattern of development. Although no outdoor amenity space is provided it is stated in section 2.3.3.2 of the Housing SPG 2016 that in exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead provide additional internal living space equivalent to the area of the private open space required. It would be very difficult to provide high quality outdoor space in this very urban environment. Further to this due to the application site's town centre location this it is not a location where inset balconies would be encouraged as it has the potential to impact the residential amenity of neighbouring occupiers. On this basis, it is considered that outdoor amenity space is not required and it is considered that the proposed arrangement would be considered acceptable in accordance with policy DM27.

Amenity of Neighbouring Occupiers

- 8.5. 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 2010.
- 8.6. Section 4.68 of the Residential Design Guide SPD 2010 states the size and siting of buildings must avoid unreasonable loss of light to, or overshadowing of, adjoining buildings and spaces. Developments which have an overbearing visual impact, when viewed from within a neighbouring building or its amenity space, and those which leave inadequate outlook from habitable room windows will not be acceptable
- 8.7. The applicant has submitted a daylight and sunlight report that considers the impact of the proposal upon the existing occupiers and the future occupiers of the proposed Housing Scheme. The tests were undertaken in accordance with the Building Research Establishment (BRE) guidelines with specific reference to Vertical Sky Component (VSC), No-Sky Line Contour (NSC) and Average Daylight

Factor (ADF) for calculating daylight and the Annual Probable Sunlight Hours (APSH) method to calculate sunlight.

- 8.8. The BRE Guidelines are intended for building designers, developers, consultants and local planning authorities. The advice it gives is not mandatory and should not be used as an instrument of planning policy. Of particular relevance, it states: "This guide is a comprehensive revision of the 1991 edition of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location."
- 8.9. The most immediate neighbours are at 'Birchfield, 1 Palmerston Road' to the immediate east of the application site which is a purpose built flatted development. An objection to the proposed development was received from an occupier of a flat contained within this building.
- 8.10. This neighbour does have windows facing west in the direction of the application site. The proposed development would be built adjacent to the wall of Birchfield. However the proposed development would not obstruct the flank window openings of the said property as the fenestration is set 3.4m away from the southern section of the flank wall and is positioned at a perpendicular angle to the proposed development. The occupier of No 12, Birchfield is concerned with the potential loss of access to natural daylight and sunlight, overlooking, loss of privacy, overbearing presence of the development and visual obstruction.
- 8.11. However it is considered that the set back is adequate as it clearly shows a 3.4m separation between the flank wall of the proposed development and the affected window opening. Moreover the proposed situation provides a much better set back from the existing situation on ground and first floor which is 1.6m. Further to this the proposed development would not interrupt a 45 degree vertical or horizontal splay from the window openings on the western wall of no.1 Palmerston Road.
- 8.12. Section 4.3.1 of the submitted daylight and sunlight assessment highlights that the BRE guide is intended to be used flexibly, particularly in urban locations in this context the application site is located in a high density town centre location. It is noted in the daylight and sunlight report submitted in support of this application that window openings closest to the proposed development would be subject to some loss of access to natural daylight and sunlight. The loss would be to the window openings of the habitable rooms at first and second floor levels located closest to the proposed development on the west facing flank of 1 Palmerston Road (numbered windows 45 and 46 in the submitted daylight and sunlight assessment please see appendix 1 drawing 3 of 4 and drawing no.2873).
- 8.13. The loss to windows 45 and 46 would be 8.7 and 8.5 respectively. However it is also noted that the results for windows 46 and 49 are fairly marginal (before/after ratios of 0.74 and 0.79 respectively – against BRE target of 0.8) which is not considered to be significant. Further to this it is highlighted that the BRE guide explains that daylight in bedrooms is less important than in other habitable rooms such as kitchens and living rooms. It is therefore acknowledged that there would be some loss of access to natural daylight and sunlight and outlook however this is considered to be within an acceptable tolerance.

- 8.14. In respect to the impact on nos.26-28 High street, Nos.14-20, the extant planning permission P/3749/17. There is not considered to be any unacceptable negative impact in respect to loss of access to natural daylight and sunlight, loss of outlook, loss of privacy or visual intrusion that would harm the residential amenity of the occupiers of the said properties.
- 8.15. In summary, it is considered that the proposal would accord with the National Planning Policy Framework (2018), policies 3.5C and 7.6B of The London plan (2016), policies DM 1 and DM 27 of the Harrow Development Management Policies Local Plan (2013), Supplementary Planning Guidance: Housing Design Guide (2012) and adopted Supplementary Planning Document (SPD): Residential Design Guide (2010).

9. Transport and Parking

- 9.1. The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use. 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 sets out maximum parking standards for new development dependent up on their use and level of public transport accessibility. Policy DM42 of the Development Management Policies Local Plan (2013) 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.
- 9.2. The application site is located in an area with a PTAL of 6a which is very high. The application site is within 150m of Harrow and Wealdstone station. Given the location of the proposed development it is considered that the future occupiers of the proposed development would benefit from high public transport capacity. The proposal for a car free development would therefore be considered acceptable given the highly sustainable location and would comply with policy DM42. While the policy does expect provision for disabled parking provision, the Council's Highways Officer has indicated that the site circumstances are such that this would not be expected in this instance as there is no scope for this within the application site.
- 9.3. The scheme proposes to combine the cycle spaces for the flats approved in application P/3749/17 with those considered under this scheme. The proposal includes 12 cycle parking spaces which would be located to the west of the main entrance to the proposed flats on Palmerston Road. This would not meet the London Plan standard in terms of cycle parking spaces for new units as the minimum provision is 1 space per one bed and 2 per two bed. The Highways Authority has stated that the number of spaces to be provided would be acceptable due to the site location.

- 9.4. It is considered that the proposed development would therefore accord with the relevant policies with regard to walking and cycling.
- 9.5. The Highways Authority requires a construction logistics plan which has been addressed through a planning condition.
- 9.6. Refuse storage is proposed to be located at the lower ground floor of the development and would include 5 x1100 litre/1280 litre bins which would meet the requirements of the Councils Code of Practice for Refuse Storage. Access will be from the Palmerston Road elevation, which would provide access to the waste area ramp. While occupants would be required to carry refuse approximately 40m from their front entrance, no objection has been raised by the Waste Management Team in this regard. The proposed refuse storage arrangement would be acceptable as it would allow a concealed location for refuse storage and safe access for occupiers . The refuse and cycle storage would be separated. Due to the large wheeled bins, occupiers would have a weekly refuse collection service. A condition has been attached seeking details of ventilation provision for the refuse storage area.

10. Flood Risk and Development

- 10.1. The Council's Strategic Flood Risk Assessment maps show that the site is located within Flood Zone 2 and 3 and Critical Drainage Area. Policy DM9 of the Harrow Development Management Policies Local Plan (2013) requires proposals should make appropriate provision for flood risk mitigation and not increase the risk or consequences of flooding.
- 10.2. While the development is not increasing the footprint of development at the application site, it is increasing the level of residential occupancy significantly. The applicant has submitted a Flood Risk Assessment to address the relevant issues. The response from the Engineering Drainage Section has stated the emergency planning information details with the safe evacuation route plus surface water flood data submitted are acceptable.
- 10.3. Subject to the conditions securing the above, it is considered that he proposed development would accord with policy 5.2 of London Plan (2016) and policy DM10 of the Harrow Development Management Polices Local Plan (2013).

Accessibility

- 10.4. Core Policy CS1.K of the Harrow Core Strategy and Policies 3.8, 7.1 and 7.2 of The London Plan (2016) require all new housing to be built to Lifetime Homes Standards. This has been replaced by New National Standards which require 90% of homes to meet Building regulation M4 (2) - 'accessible and adaptable dwellings'.

- 10.5. In terms of access, the flats would have one main access point to the lobby fronting onto Palmerston Road. This arrangement is considered to be in keeping with the area and therefore acceptable. The future occupiers would access the units on the upper floors of the building by way of the internal stairs.
- 10.6. London Plan policy 3.8 which addresses housing choice, requires 90% of new housing to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% of new housing to meet Building Regulation requirement M4 (3) 'wheelchair user dwellings, i.e., is design to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The application site does not have any ground floor residential units proposed, nor does it have a lift and it would not be considered reasonable to make M4 (3) a requirement, especially with the limited number of new units. However, there are specifications that can be included to make residential units of this type to be more accessible and so the requirement to meet M4 (2) as far as possible will be secured via a planning condition.
- 10.7. CONCLUSION AND REASONS FOR APPROVAL
- 10.8. The principle of providing additional residential accommodation at the application site has been considered as acceptable. The proposed housing development would bring forward housing provision of a satisfactory mix to provide housing choice to the borough and of an adequate level to ensure suitable accommodation for future occupiers. It is considered that the proposed additional two storeys would have an acceptable design and external appearance and would not have an undue impact on the character and appearance of the area or the residential amenity of neighbouring occupiers. The proposal would provide appropriate living conditions for the future occupiers of the development. In addition to this, the details submitted in relation to refuse and cycle parking is considered to be acceptable subject to conditions requiring further details. For all the reasons considered above, and weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification the proposed development is recommended for approval.

APPENDIX 1: Conditions and Informatives

Conditions

1. Timing

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.

2. Approved Drawing and Documents

The development hereby permitted shall be carried out in accordance with the following approved plans and documents: 2841 Revision No.4, 2842 Revision No.3 2842 Revision No.1, 2844 Revision No.0, 2846 Revision No.1, 2873, Site Plan, Daylight and Sunlight assessment, Design & Access Statement, Flood Risk Assessment (Including Evacuation Plan)

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

3. Materials

Notwithstanding the details on the approved plans, the development hereby permitted shall not commence until samples of the materials to be used in the construction of the external surfaces noted below have been submitted to, and approved in writing by, the local planning authority:

Facing materials and roof

Windows and doors;

Rainwater goods

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

REASON: To safeguard the appearance of the locality

4. Construction Logistics Statement

No development shall take place until a Construction Logistics Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

Arrangements for loading/unloading of vehicles including anticipated numbers of HGV's and hours of deliveries

Parking for site operatives and visitors

Any specialist vehicle needs eg. crane – how these will be installed/removed

Temporary traffic management requirements – pedestrians and vehicular

Project timescale

Site layout plan

Location of materials storage/welfare

REASON: To ensure that the construction of the development does not unduly impact on highway safety and the amenities of the existing occupiers of the properties adjacent to the site.

5. Refuse Storage

Notwithstanding the details on the approved plans, the development hereby permitted shall not commence until details of ventilation for the refuse storage area have been submitted to, and approved in writing by, the local planning authority

The refuse and waste bins shall be stored at all times, other than on collection days, within the designated refuse storage areas as shown on the approved plans.

REASON: To enhance the appearance of the development and safeguard the character and appearance of the area.

6. Secure by Design

Evidence of certification of Secure by Design Accreditation for the development shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

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

7. Flues and Pipework

No soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevation fronting Palmerston Road of the buildings hereby approved.

REASON: To enhance the appearance of the development and safeguard the character and appearance of the area.

8. Cycle Storage

Prior to occupation of the development hereby approved safe and secure cycle storage for 12 x bicycles shall be provided for the use of future occupiers. The bicycle storage shall be implemented and shall thereafter be retained.

REASON: To provide safe and secure cycle storage for the use of future occupiers.

9. M4 (2) Accessibility

The development hereby permitted shall be constructed to the specifications of: “Part M, M4 (2), Category 2: Accessible and Adaptable Dwellings” of the Building Regulations 2013 as far as possible and thereafter retained in that form.

REASON: To ensure that the development is capable of meeting ‘Accessible and Adaptable Dwellings’ standards.

Informatives

1. Policies

The following policies and guidance are relevant to this decision:

National Planning Policy and Guidance: National Planning Policy Framework (2018)

The London Plan (2016):

- 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
- 3.6 Children and Young People's Play and Informal Recreation Facilities
- 3.7 Large Residential Developments
- 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
- Local Development Framework
- Harrow Core Strategy 2012
- CS1 B Local Character
- CS 1 U Flooding
- Harrow and Wealdstone Area Action Plan (2013)
- AAP3 – Wealdstone
- AAP4 – Achieving a High Standard of Design and Layout throughout the Heart of Harrow
- AAP 9 – Flood Risk and Sustainable Drainage
- AAP13 – Housing within the Heart of Harrow
- AAP19 – Transport, Parking and Access within the Heart of Harrow
- Development Management Policies Local Plan 2013
- DM1 Achieving a High Standard of Development
- DM2 Achieving Lifetime Neighbourhoods
- DM9 Managing Flood Risk
- DM10 On Site Water Management and Surface Water Attenuation
- DM12 Sustainable Design and Layout
- DM23 Streetside Greenness and Forecourt Greenery
- DM24 Housing Mix
- DM27 Amenity Space
- DM37 Secondary Shopping Frontage

DM42 Parking Standards
DM44 Servicing
DM45 Waste Management
Supplementary Planning Documents
Mayor of London Housing Supplementary Planning Guidance (2012)
Residential Design Guide Supplementary Planning Document (2010)
Accessible Homes Supplementary Planning Document (2010)
Building Regulations 2010 M4 (2) Category 2: Accessible and Adaptable Dwellings
Technical Housing Standards- Nationally Described Space Standard 2015
Code Of Practice For The Storage And Collection Of Refuse And Materials For Recycling In Domestic Properties 2016

2. Grant with 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. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3. Mayor CIL

Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £34,558

This amount includes indexation which is 323/323. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date please also complete CIL Form 6:

https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties.

4. Harrow CIL

Harrow has a Community Infrastructure Levy which will apply Borough wide for certain uses of over 100sqm gross internal floor space. The CIL has been examined by the Planning Inspectorate and found to be legally compliant. It will be charged from the 1st October 2013. Any planning application determined after this date will be charged accordingly.

Harrow's Charges are: £36,520

Residential (Use Class C3) - £110 per sqm;
Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2),
Student Accommodation, Hostels and HMOs (Sui generis)- £55 per sqm;
Retail (Use Class A1), Financial & Professional Services (Use Class A2),
Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)
Hot Food Takeaways (Use Class A5) - £100 per sqm
All other uses - Nil.

The Harrow CIL Liability for this development is: £36,520

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.

5. 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

6. 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

7. INFORMATIVE:

Notwithstanding the details set out in condition 16 above, the Construction Management Plan should also be produced in accordance with Transport for London guidance. Further information can be found at: <https://tfl.gov.uk/infofor/urban-planning-and-construction/transport-assessment-guide/guidance-bytransport-type/freight>

8. INFORMATIVE:

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

9. STREET NAMING AND NUMBERING INFORMATIVE

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939. All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc.

You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link.

http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

Plan Numbers: 2841 Revision No.4, 2842 Revision No.3 2842 Revision No.1, 2844 Revision No.0, 2846 Revision No.1, Site Plan, Daylight and Sunlight assessment, Design & Access Statement, Flood Risk Assessment (Including Evacuation Plan)

Checked:

Interim Chief Planning Officer	Beverley Kuchar	Yes
Corporate Director	Paul Walker	Yes

APPENDIX 2: SITE PLAN

Ordnance Survey Site Plan – 22-24 High Street, Wealdstone HA3 7AA



APPENDIX 3: PHOTOGRAPHS



High Street Wealdstone elevation



Palmerston Road elevation



26 to 28 High Street Wealdstone

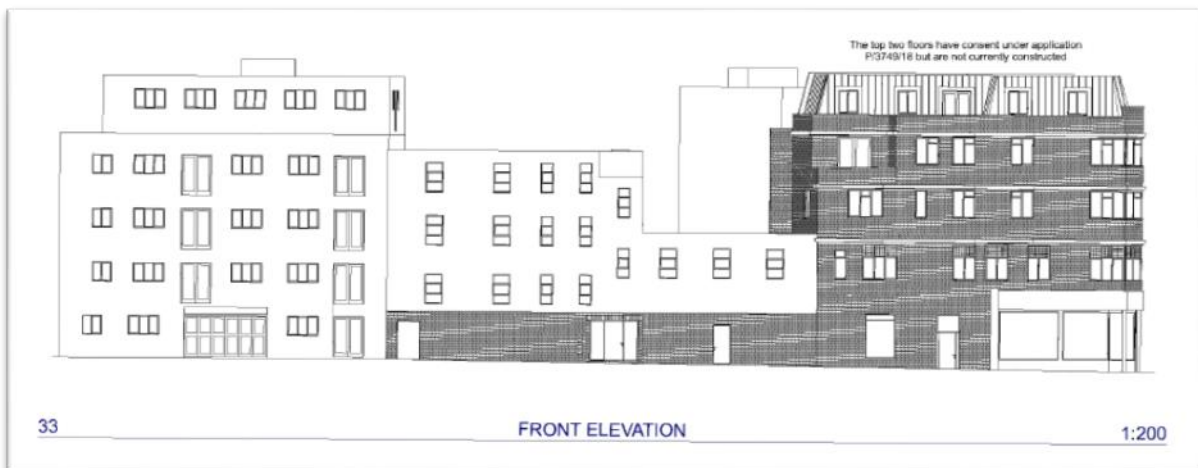


Side windows of Birchfield

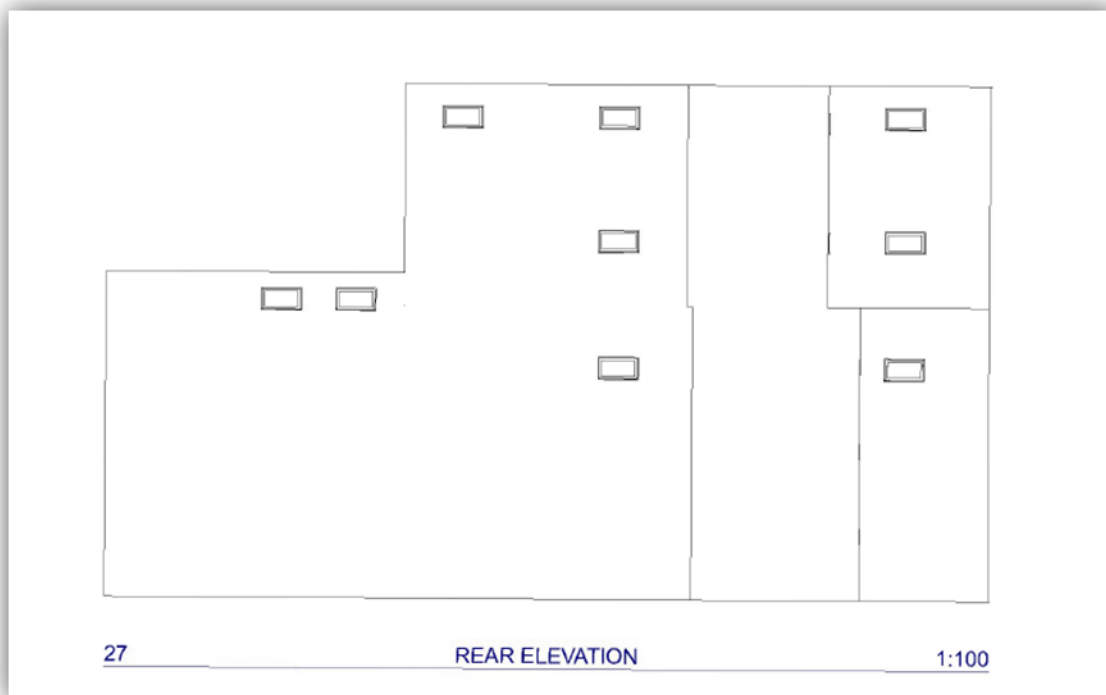


Side elevation of Birchfield

APPENDIX 4: PLANS AND ELEVATIONS



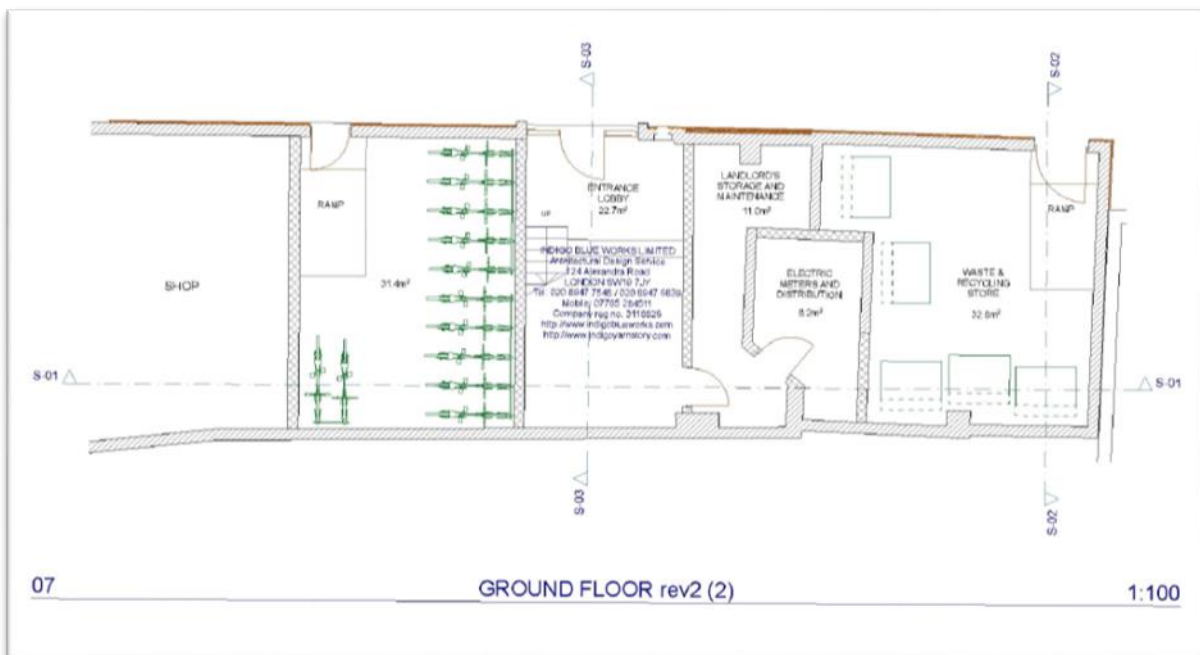
Front elevation



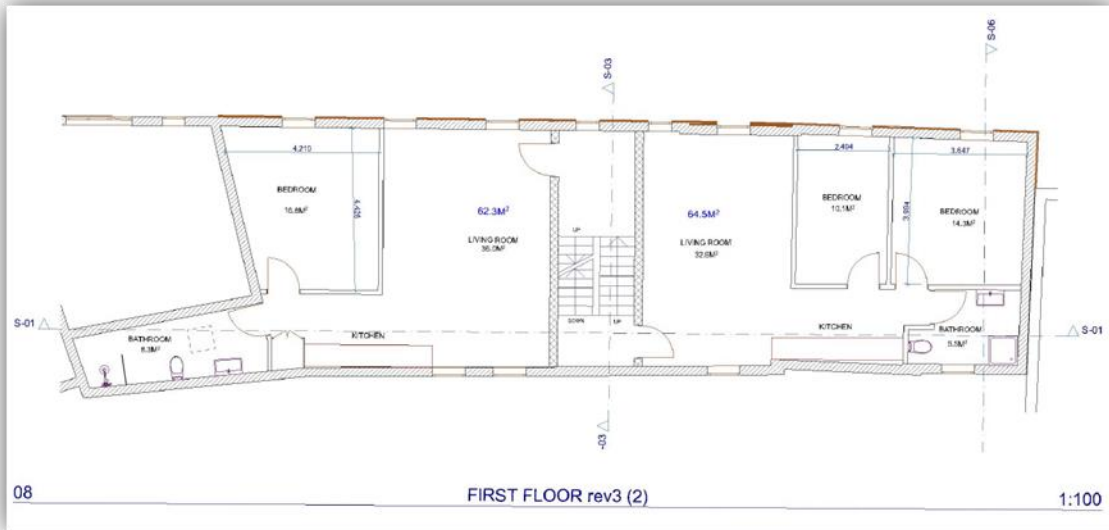
Rear elevation



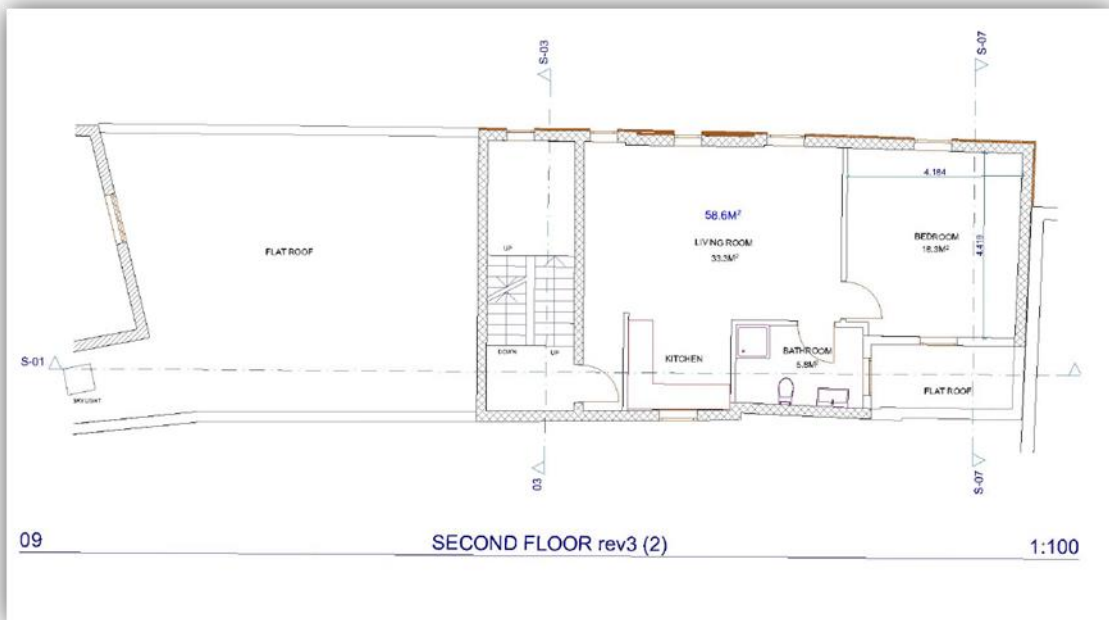
Cross sections



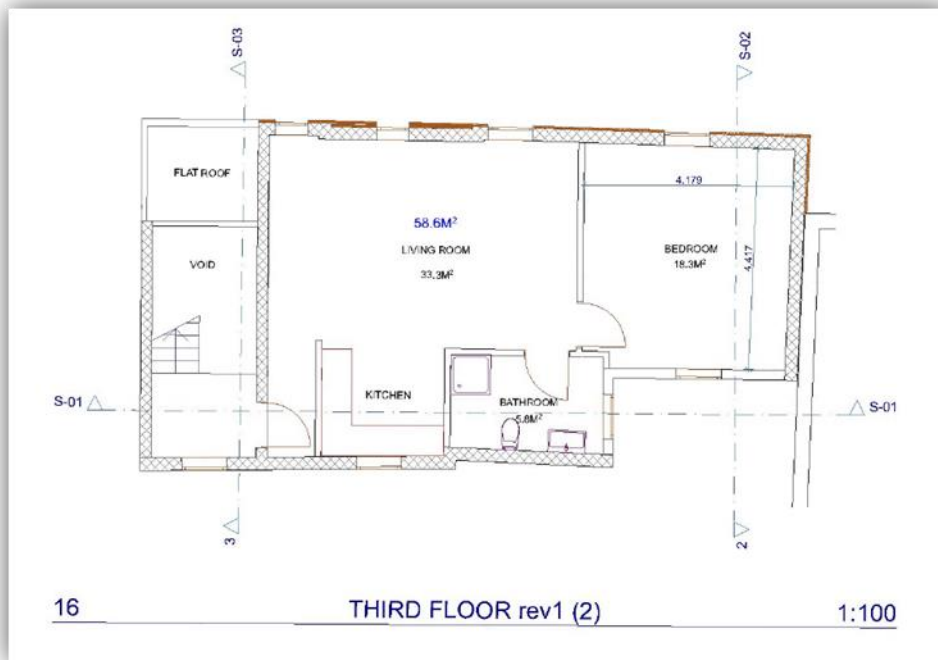
Ground floor plan



First floor plan



Second Floor plan



Third floor plan

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