

Planning Committee Report	
Planning Ref:	FUL/2017/2239
Site:	The Old Dairy Crest Site, Harper Road
Ward:	St Michael's
Applicant:	Crosslane Group
Proposal:	Demolition of existing Dairy Crest Distribution Depot with the erection of a three to six-storey student residential building containing 50 cluster flats totalling 266 student bedrooms with associated amenity space, communal facilities, cycle parking and landscaping
Case Officer:	Rebecca Grant

SUMMARY

The application proposes to demolish the existing Dairy Crest Distribution Depot which has been vacant for approximately 5 years and replace it with high quality student accommodation. The building will be a mixture of 3, 5 and 6 storeys with the 3 storey element fronting Harper Road, opposite existing residential properties. The 6 storey element will front the River Sherbourne and the 5 storey element will provide a link to the 3 storey block. A total of 266 student bedspaces will be provided.

The proposal will not have a significant adverse impact on neighbour's amenity or highway safety and overall will provide an improvement to the character of the area.

KEY FACTS

Reason for report to committee:	Representations from more than 5 properties
Site area:	0.31 ha
Height of building:	3 storey section Harper Road, 6 storey section fronting the River Sherbourne and 5 storey middle section
Number of students:	266
Number of car parking spaces:	2
Number of cycle parking spaces:	132
Proposed materials:	Brickwork proposed for lower storeys and bronze metal cladding for upper storeys
Unilateral Undertaking:	£26,129.00 towards NHS Trust and securing the tenure for students only

RECOMMENDATION

Planning committee are recommended to grant planning permission subject to conditions and completion of a Unilateral Undertaking towards NHS Trust and securing the tenure for students only.

REASON FOR DECISION

- The proposal is high quality design improving the character of the area
- The proposal will not adversely impact upon highway safety
- The proposal will not adversely impact upon the amenity of neighbours

The proposal accords with Policies OS2, OS3, OS4, OS6, OS7, OS10, EM2, EM4, EM5, EM6, EM8, GE14, GE15, H1, H12, E10, AM1, AM9, AM12, AM22, BE2, BE19, BE20 and BE21 of the Coventry Development Plan 2001, together with the aims of the

NPPF and Policies DS1, DS3, HW1, JE3, H1, H10, GE3, DE1, HE3, AC3, AC4, EM1, EM2, EM3, EM4, EM5 and EM6 of the emerging Local Plan 2016.

BACKGROUND

APPLICATION PROPOSAL

Planning permission was granted last year for a very similar scheme in terms of the form, massing and layout of the site. The previous application provided 200 student bedspaces however this current application proposes 266 student bedspaces which will be provided in cluster bedrooms. The overall footprint and height of the proposed building has been slightly reduced. The difference between the proposed scheme and the approved scheme is that the current proposal is solely for cluster flats. The approved scheme included 1 bedroomed studios which took up a greater floorspace.

At ground floor level to serve the student accommodation is a common room, plant and management office. In addition at ground floor level is the cycle store. The common room will be the heart of the development with access from both Harper Road and off the riverside walk fronting the River Sherbourne.

The scale of the proposal varies with the block fronting the River Sherbourne being 6 storeys, the block fronting Harper Road being 3 storeys and the middle block being 5 storeys. The scale reduces in height and mass towards Harper Road to reflect local context. Following the granting of the previous approval for student accommodation, the mass of the section of the building fronting Harper Road has been reduced as part of the building has been pulled further back from Harper Road.

Materials proposed are varied and include red brickwork and bronze metal cladding. The site has been designed to ensure that the building provides a built form to Harper Road in order to replicate the existing dwellings opposite the site. Vehicular access to the site is gated and located along Harper Road, centrally positioned within the site frontage. 2 parking spaces are provided for staff and visitors within the internal courtyard of the development. The cycle store, comprising secure storage for 132 cycles, is proposed on the ground floor of the development, accessible from this internal courtyard.

The application is supported by the following documentation:

- Design and Access Statement
- Noise Assessment
- Ground Investigation
- Policy E8 Justification
- Ecological Assessment
- Flood Risk Assessment
- Statement of Community Involvement
- Air Quality Assessment
- Student Management Plan
- Transport Assessment
- Energy and Sustainability Assessment
- Planning Statement
- Unexploded Ordnance Survey
- Japanese Knotweed Survey

SITE DESCRIPTION

The site is located on Harper Road, approximately 300m from the Ring Road and 100m from Coventry University. The site was previously occupied by Dairy Crest however it has been vacant for approximately 5 years. The existing building on site is a large barrel roofed

warehouse with multiple flat roofed extensions. The existing site is not aesthetically pleasing to view from the adjacent residential properties.

Immediately to the north of the application site is a tyre repair centre. Beyond this sits the edge of the Coventry University campus, with its car park, library and engineering building. The area directly adjacent to the east and south of the site are industrial units with some commercial uses. Beyond the industrial units to the east and south lie residential properties. To the north west and west of the site are traditional two storey residential properties. A number of these residential properties are houses in multiple occupation (HMO's) and are occupied by students.

Harper Road is relatively narrow which does not lend itself to large industrial vehicles. The majority of the dwellings along Harper Road do not have dedicated off road parking.

PLANNING HISTORY

There have been a number of historic planning applications on this site; the following are the most recent/relevant:

Application Number	Description of Development	Decision and Date
FUL/2016/1257	Demolition of existing Dairy Crest Distribution Depot with the erection of a new 4, 5 and 7 storey building comprising of 3, 4, 5, 6 and 7 bedroom clusters and studio totalling 225 students bedroom with associated communal facilities, car parking, cycle parking and landscaping	Withdrawn 15/08/2016
FUL/2016/2087	Demolition of existing Dairy Distribution Depot with the erection of a new 3/5/6 storey building comprising of 3/4/5/6/7 bedroom clusters and 1 bedroom studios totalling 200 student bedrooms, with associated communal facilities, car parking, cycle parking and landscaping (revised scheme)	Approved 03/10/2016
FUL/2016/3054	Partial demolition of existing building and change of use to B1 offices	Approved 01/02/2017

Application FUL/2016/1257 was withdrawn to allow negotiations to take place with the design of the scheme.

POLICY

National Policy Guidance

National Planning Policy Framework (NPPF). The NPPF published in March 2012 sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that is relevant, proportionate and necessary to do so. The NPPF promotes sustainable development and good design is recognised as a key aspect of this.

The National Planning Practice Guidance (NPPG) 2014, this adds further context to the NPPF and it is intended that the two documents are read together.

Local Policy Guidance

The current local policy is provided within the Coventry Development Plan 2001 (CDP) relevant policy relating to this application is:

- OS2 – Strategic regeneration sites
- OS3 – Local area regeneration
- OS4 – Creating a more sustainable city
- OS6 – Change of land use
- OS7 – Mixed use development
- EM2 – Air quality
- EM4 – Flood risk and development
- EM5 – Pollution protection strategy
- EM6 – Contaminated land
- EM8 – Light pollution
- H1 – People and their housing needs
- H2 – Balancing new and existing housing
- H12 – Design and density of housing development
- E10 – Accessibility to job opportunities
- AM1 – An integrated, accessible and sustainable transport strategy
- AM9 – Pedestrians in new developments
- AM12 – Cycling in new developments
- AM22 – Road safety in new developments
- BE2 – The principles of urban design
- BE19 - Lighting
- BE20 – Landscape design and development
- BE21 – Safety and security
- GE14 – Protection of landscape features
- GE15 – Designing new development to accommodate wildlife

Emerging Policy Guidance

The Draft Local Plan 2016 to 2031 has been submitted to the Inspectorate, examination hearings and consultation on modifications has concluded and the Inspector's report has been received. The draft plan and report have been published and are a material consideration in the determination of applications. The draft plan and report will be presented to Full Council in December, if recommendations are approved it will become the adopted development plan. Policies within the draft local plan that are relevant include:

- DS1 – Overall Development Needs
- DS3 – Sustainable Development Policy
- HW1 – Health Impact Assessment (HIA)
- JE3 – Non-Employment Uses on Employment Land
- H1 – Housing Land Requirements
- H10 – Student Accommodation
- GE3 – Biodiversity, Geological, Landscape and Archaeological Conservation
- DE1 – Ensuring High Quality Design
- HE3 – Charterhouse Heritage Park
- AC3 – Demand Management
- AC4 – Walking and Cycling
- EM1 – Planning for Climate Change Adaption
- EM2 – Building Standards
- EM3 – Renewable Energy Generation
- EM4 – Flood Risk Management

EM5 – Sustainable Drainage System (SuDS)

EM6 – Air Quality

Supplementary Planning Guidance/ Documents (SPG/ SPD):

SPG Design Guidelines for New Residential Development

SPD Delivering a more sustainable city

CONSULTATION

No Objections subject to conditions received from:

Ecology

Drainage (CCC)

Environmental Protection (CCC)

Highways (CCC)

Urban Design (CCC)

Conservation (CCC)

University Hospitals Coventry and Warwickshire NHS Trust

Sustainability

Objections have been received from:

Environment Agency

Immediate neighbours and local councillors have been notified; a site notice was posted on 19/10/2017. A press notice was displayed in the Coventry Telegraph on 19/10/2017.

8 letters of objection have been received, raising the following material planning considerations:

- a) Acknowledge that there have been minor reductions to the size of the proposed building from the previous application however the 6 storey building is not in keeping with the houses on the opposite side of Harper Road.
- b) The proposed number of students will affect the population density of the area significantly.
- c) The site is an industrial site. To be converted to residential land it must be demonstrated that the site cannot be used for industrial purposes. There has been little attempt to use or market this site for employment.
- d) There is big demand in the area for affordable housing for non-students. This development does not enhance or preserve the mix of housing.
- e) Concern about level of noise and general disturbance from 266 students.
- f) Pressure on existing drainage system.
- g) Pressure on levels of car parking.
- h) Potential impact upon ecology.
- i) Impact upon privacy of residents opposite the application site.
- j) Potential issues with anti-social behaviour.

The Historic Coventry Trust have objected to the application on the following grounds;

- Concerns over the cycle and pedestrian link to the Heritage Park as the area shown on the plans includes a steep bank with mature landscape that leads up from the river to the boundary of the existing building;
- Sunlight is very important to the river health and to ecology. The height of the proposed building would put the river almost perpetually in shadow over a 55m stretch.

- The potential for retention of employment use at the site is very real as there is a high level of demand for offices in this location. It removes a site for digital creative industries in exactly the location where it is needed and creates a precedent that will make it impossible to create a digital creative cluster along the riverside. The loss of the city by not tapping into the growth of the digital sector will be highly significant in jobs growth, attracting new businesses, existing businesses and graduate retention.

Any further comments received will be reported within late representations.

APPRAISAL

The main issues in determining this application are principles of development, design, impact upon neighbouring amenity, highway considerations, flood risk, contaminated land, sustainability and archaeology.

Principle of development

The principle of student accommodation on this site has been accepted by the granting of planning permission (ref 2016/2087).

At the heart of the NPPF is a presumption in favour of sustainable development and this report will demonstrate that the proposal is acceptable after consideration of a number of key issues and therefore the proposal is considered to accord with the aims of the NPPF.

Policy OS6 of the CDP and Policy DS1 of the emerging Local Plan state that except where specific proposals are shown on the proposals map, the general policies of the plan will apply and developments should be compatible with nearby uses.

Accessible location

The proposed development sits adjacent to the city centre boundary as defined by the CDP and is located in a highly sustainable location that is accessible by public transport (bus and train) and within walking distance of Coventry University and city centre shops. It therefore supports the aims of Policies OS4 and AM1 of the CDP and Policies DS3 and AC1 of the emerging Local Plan, which together, encourages development to be planned in accessible locations and promote alternatives to the use of the private car.

Regeneration benefits

The local planning authority welcomes the proposed development which offers strong regeneration benefits by redeveloping a previously developed site in close proximity to the city centre which has been unoccupied for a number of years and providing uses appropriate to this city centre location which will add vibrancy to the locality. It is hoped that the development will also act as a catalyst for further re-development of other nearby sites.

Principle of student accommodation

The NPPF recognises the importance of providing a supply of housing and paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. The proposal is considered to constitute sustainable development and whilst not a traditional 'residential' use, would help deliver the housing needs of the city. The proposal in this regard can therefore be considered to be in harmony with the NPPF.

Policy H1 of the CDP states that all existing and proposed citizens should have access to a range of housing that is of satisfactory size and condition and within a high quality residential

environment. Whilst the size and condition of residential properties is a matter for other legislation, the development will provide attractive residential accommodation suitable for students within a highly sustainable location within the city centre and nearby Coventry University and therefore it is considered that the proposal accords with this policy.

CDP policy H2 highlights that priority for new housing should be given to the re-use of previously developed land and buildings. The proposed development complies with this policy as the application site is previously developed land and the proposal would provide high density living accommodation on a site within close proximity to the city centre which is also likely to alleviate pressure on traditional family housing in areas near to the city centre which may currently be or otherwise be occupied by students in the future.

Policy CC3 encourages 'A living heart' which supports this application and it is also likely that the development will support other services including retail and leisure uses and the night-time economy. As such, the development can also be considered to be in harmony with the aims of Policy CC2 'A vibrant and entertaining market place'.

A number of objectors have raised concerns with the need for more student accommodation. As the University grows, so does the need to provide high quality accommodation. The aim of purpose built student accommodation is to try to free up dwellings which have been converted to houses in multiple occupation within established residential areas.

Loss of employment land

Policy E8 of the CDP seeks to protect existing employment sites, unless substantial evidence demonstrates that the re-use for employment purposes is not realistic or would produce unacceptable environmental, amenity or traffic problems. The policy states that in such cases, 'quasi-employment' uses may be introduced but only to the extent necessary to bring about the redevelopment of the site for employment uses. It further highlights that, where the introduction of 'quasi-employment' uses will not bring about redevelopment, proposals for mixed uses including a predominance of employment uses will be considered, but only to the extent necessary to bring about re-development. Only where redevelopment cannot be brought about by these means will proposals for residential, open space or other uses be permitted, subject to other plan policies.

The NPPF has been published more recently than the CDP and differs in its approach to the protection of employment sites. Paragraph 22 states that: "Planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose.....Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities".

Policy JE3 of the emerging Local Plan also refers to paragraph 22 of the NPPF and advises that the loss of employment land may be acceptable if the land is no longer suitable for employment uses bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land uses.

Following the granting of the previous consent for student accommodation, a planning application to demolish part of the building and change the use of the building to offices was submitted. Planning permission (reference FUL/2016/3054) was granted in February this year. This consent has not been implemented. Whilst planning permission was granted for an office scheme, the owner's intention is to redevelop the site for student accommodation

for either 266 student bedspaces under the current application or the fall-back position of the approved scheme.

It is acknowledged that Historic Coventry Trust have objected to the proposal on the basis that there is real potential for employment use at the site. Given that the applicants for application 2016/3054 (which approved partial demolition of existing building and change of use to B1 offices) are not the owners of the site, there is no real potential for this site coming forward.

Given the location of the application site, outside of the commercial core, within a predominately residential area and having poor road access, it is considered that the site is not ideal for office or industrial uses. On this basis, and bearing in mind the City Council's desire to see the site and area redeveloped and regenerated, the loss of employment land in this instance is considered to be acceptable.

Overall, the proposal is considered to be acceptable in principle subject to the detailed considerations outlined elsewhere in the appraisal section of this report.

Design

The Design and Access Statement sets out the design rationale of the development and provides computer generated images of the development, details of the design evolution and the rationale behind the design.

Policy BE2 of the CDP and Policy DE1 of the emerging Local Plan require development to be of good design whilst Policies BE20, H12 and Policy H9 of the emerging Local Plan also seek to ensure that development is appropriately designed. The NPPF further emphasises the importance of good design with paragraph 56 highlighting that good design is a key aspect of sustainable development and is indivisible from good planning.

Officers consider the development, which has evolved further following the approval of the previous student scheme, to be of a high standard of design that will have a positive impact upon the appearance of the local area and city as a whole as its prominent location and scale means that it will be viewed by residents and visitors to the city centre. The principle changes involve;

- A reduction in the mass of the southern section of the building fronting the properties in Harper Road;
- A reduction in the overall height of the section fronting Harper Road by 0.3m;
- A reduction in the overall height of the middle section of the building by 0.3m; and
- A reduction in the height of the section of the building fronting the River Sherbourne by 0.4m

It is considered that designing the building so that it fronts Harper Road provides a development more appropriate in scale with the existing residential properties within Harper Road. It also provides a dynamic street frontage, vastly improving the visual appearance of the site.

There are three distinct sections to the building, 1) fronting Harper Road, 2) fronting the River Sherbourne and 3) the middle section. The section of development fronting Harper Road is 3 storeys with the eaves of the proposed building being only marginally higher than the dwellings opposite. The section of the middle building is 5 storeys however there are no windows in the elevation which fronts Harper Road and this section is partly hidden from

view by the frontage building. The roofline of this section varies representing the form of more historical industrial buildings within the local area.

It is considered that the proposed development sits comfortably within the surrounding environment, in particular, the existing residential properties opposite the site in Harper Road. Whilst the scale of the development increases towards to the rear of the site, this section is more in context with the River Sherbourne.

As part of the emerging Local Plan, Policy HE3 states that the Council will create a 'Heritage Park' in the grounds of the Charterhouse. This will include measures to improve linkages along the River Sherbourne between the Charterhouse and Far Gosford Street. The policy goes on to state 'proposals to establish the park will be supported along with measures to improve heritage linkages to the area, and improve accessibility between the city centre and the Charterhouse grounds. These should include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along Harper Road and Humber Avenue.'

The Historic Coventry Trust have raised concerns over the cycle and pedestrian link to the Heritage Park as the area shown on the plans includes a steep bank with mature landscape that leads up from the river to the boundary of the existing building. The agents have provided an indicative section to illustrate how this river walkway may work. This illustrates that the building is set back from the top of the river bank by 9.7m. There is sufficient space to create a walkway within the application site which allows the potential to link to other sites. The land on which the walkway is to be located will be levelled. The land will then slope down to the river bank. This land provides access for the Environment Agency for maintenance of the river.

The Local Plan is near adoption and consequently is a material consideration when determining any planning application. The scheme complies with Policy HE3 by creating a riverside walkway within the site boundary, along the River Sherbourne, allowing for future development of the riverside link from the historical Far Gosford Street to the new Charterhouse Heritage Park.

The proposed materials reflect the industrial heritage of the site in its material palette, with facing brickwork proposed for the lower storeys and bronze metal cladding for the upper storeys. The varying angles of the roof reflect an industrial aesthetic with bronze metal cladding and roofing. The roof/wall finish also maintains an industrial feel. The ground and first floor have been given a red blended mix brick finish to give a connection to the houses on Harper Road and is considered to be a complementary material to the bronze metallic cladding. The roof on the five storey block (the middle section) on both sides of the courtyard is covered in a green sedum roof, to help with surface water run-off.

One of the overarching aims of the development is to kick-start the wider development of this run down area. The site has been designed so as to not stifle the development of adjacent sites in terms of window positioning and the scale of the building. The agents have submitted an initial indicative masterplan of how the area could be developed, creating a riverside walk and connecting with the community around it. This is however not being assessed as part of this development.

It is considered that the scheme proposed is well designed and will provide a high quality development. The scale of the buildings is proportionate to the scale of development within

the surrounding area in accordance with Policy BE2 of the CDP and Policy DE1 of the emerging Local Plan 2016.

Impact on neighbouring amenity

Paragraph 17 of the NPPF seeks to protect the amenities of all existing and future occupants of land and buildings. As indicated elsewhere in this report, the proposed uses are considered to be appropriate for their location and are compatible with other nearby uses.

SPD 'Design Guidelines for New Residential Development' provides guidance for new residential development. The document provides useful guidance on distance separation although it is clearly written for family housing developments outside a city centre location. Generally, a window-window distance separation of 20m+ is recommended where windows are clear glazed.

The closest residential properties to the application site sit to the west of the site, on the opposite side of Harper Road. The scheme has been redesigned to provide a built frontage to Harper Road bringing the development closer to the existing residential units on the opposite side of the road. There is a maximum of 21m and minimum of 19m from the front of the proposed student accommodation to the front elevation of the existing dwellings. The variation in distance is due to the location of the existing dwelling and the proposed building following the curve of Harper Road. This distance between the proposed building and the existing properties has increased due to the southern section of the building fronting Harper Road being pulled back from the highway. The proposed scheme therefore allows for a slightly increased distance between properties.

Whilst it is appreciated that the distance between habitable windows does not meet the guidance in our SPD, given the edge of city centre location and the relatively high density of the terraced streets surrounding the site, it is considered that the distance is acceptable. In addition, from an urban design perspective, it was considered that a more acceptable design could be achieved by the building providing a frontage to Harper Road. This relationship is not different to nearby surrounding residential streets where the front elevation of dwellings face each other.

The height of the proposed building fronting Harper Road has been reduced in scale to ensure that it is more comparable to the existing two storey dwellings on the opposite side of Harper Road. The eaves line of the proposed student accommodation has been lowered and balconies have been removed.

The section of building fronting Harper Road has been designed to provide direct access from the highway to a number of units in order to create an active frontage along Harper Road and enliven the street.

Whilst the concerns of residents in relation to the increase of students within an established residential area are understood, it is considered that the location of the development on the edge of the city centre, in close proximity to the University campus, public transport and shops, is ideal for student accommodation. On balance, given the design of the building, it is not considered that the proposed development will significantly impact upon the amenity of existing residents within the immediate area in accordance with Policy BE2 of the CDP and Policy DE1 of the emerging Local Plan 2016.

Highway considerations

Policies AM1 and AM22 of the CDP relate to highway and transport matters including highway safety. The NPPF also promotes sustainable travel.

The site is within walking and cycling distance of a range of amenities, shops, bus stops providing services around the city, Coventry Railway Station and Coventry University and therefore accords with Policies AM1 and OS4 of the CDP. The proposal is considered to accord with section 4 of the NPPF which encourages reductions in greenhouse gas emissions and congestion and also the use of sustainable modes of transport.

The applicant has submitted a Transport Statement. This highlights that the development will provide 2 parking spaces for staff and visitors. The report states that there will be no further provision for car parking due to the vicinity of the building to the city centre and existing transport links. As the development is in such a sustainable location, as part of the tenancy agreement, there will be a 'no car' policy in place which prevents students bringing cars to the site.

Representations have raised concerns with the pressure on parking within Harper Road. Residents will still be able to park as they currently do. Harper Road is not wide enough to have parking on both sides of the road whilst still allowing enough space for vehicles to pass. Currently cars are parking on the forecourt to the site which is not authorised. Harper Road however provides parking for residents permit holders only and therefore no additional cars would be allowed to park on Harper Road without first obtaining a permit and permits are not provided for students as only residents who pay Council Tax are eligible to apply.

The application proposes 132 secure cycle spaces which is in accordance with the requirements of the SPD.

Servicing to the student accommodation will be directly from Harper Road as the current situation.

In order to minimise the impact of the development upon the local highway network during construction, a construction management plan condition is proposed.

A Student Management Plan with regards to car parking has been submitted with the application however additional information has been requested on how the arrival and departure of students will be managed in order to minimise any disruption to residents living within Harper Road. At the time of drafting the committee report this information was not available. An update will be provided as a late item. If the details contained within the Student Management Plan are not acceptable, then the application be recommended for refusal based on the fact that insufficient information has been submitted in order to justify the level of parking proposed.

Flood Risk/drainage

Policy EM4 of the CDP states that development should be designed and located to minimise the risk of flooding and to maximise the absorption of surface water run-off by the ground. Mitigating flood risk is a core planning principle of the NPPF and paragraph 100 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, it should be made safe without increasing flood risk elsewhere.

The Flood Risk Assessment (FRA) forming part of the application highlights that the site is located within Flood Zone 1 and therefore there is a low risk of fluvial flooding. However due

to the proximity of the site to the River Sherbourne, Environmental Agency flood data has been requested and is addressed in the FRA.

The Ground Investigation identified that the site does have quite high groundwater, ranging between 1m above ground level and 3m above ground level. It is concluded that there could be a risk of encountering groundwater during the construction phase. This was also highlighted when the previous application was approved.

Surface water flood risk mapping has been prepared by the Environment Agency. It shows that the site is at some risk of surface water flooding. The site itself is shown to fall within an area which is generally at very low risk of flooding, with low and medium risk of surface water flooding in the northwest quarter of the site.

The mapping shows that there is a low point along Harper Road outside the site, where flows of runoff from high risk events could pond, which could affect access and egress to the site. The development plan shows the site has been designed to ensure residential dwellings are well removed from the areas at high risk of surface water flooding and finished floor levels should be raised 150mm above the existing ground levels to reduce residual risk.

The FRA demonstrates that the proposed development is not at significant flood risk, subject to the recommended flood mitigation strategies being implemented. The Drainage Team have confirmed they have no objection to the proposal subject to a number of conditions being attached to any planning consent.

At the time of drafting this report, the Environment Agency is objecting to the application. The agent is in discussion with the Environment Agency to remove their objection. Any update will be reported as a late item.

Noise and Air Quality

Policy EM5 of the CDP states that proposals which could result in the pollution of water, air or ground or pollution through noise, dust, vibration, smell, light, heat or radiation will only be permitted if:

- the health, safety and amenity of the users of the land and neighbouring land; and
- the quality and enjoyment of the environment are assured.

The policy further states that proposals for uses which are sensitive to pollution will not be permitted close to existing or proposed potentially polluting uses or in their areas of influence. Paragraph 129 of the NPPF also seeks to prevent new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Policy EM2 states that where damage to air quality cannot be satisfactorily mitigated, development will not be permitted. Paragraph 124 of the NPPF also seeks to ensure that development within Air Quality Management Areas (which includes the whole of Coventry) is not harmful to air quality.

The submitted Air Quality Assessment states that the basic hierarchy principles of determining appropriate mitigation measures for a development scheme are as follows;

1. Preventing and avoiding – if possible, prevent or avoid exposure to the pollutant by isolating or removing potential sources through the design process.

2. Reduction and minimisation – all options for avoiding exposure and preventing exposure should be then implemented.
3. Off-setting – compensating for impact associated with the new development by contributing to air quality improvement elsewhere.

As there are no exceedances in air quality, no embedded mitigation into the scheme design is considered to be required. It is not proposed to impose vehicle charging point as the scheme will be car-free.

The submitted Noise Assessment recommends that specific glazing/vent configurations are followed for bedrooms, dining rooms and living rooms within the building in order to meet internal noise criteria. It is noted that the internal guideline criteria for habitable rooms will only be achieved if the windows are closed.

The Council's Environmental Protection team supports the approaches taken in the Noise Assessment. A number of conditions are recommended to ensure conformity with Policies EM2 and EM5 of the CDP and the NPPF and Policy EM6 of the emerging Local Plan 2016.

Contaminated Land

CDP Policy EM6 states that development on or adjacent to contaminated land will be permitted only if any measures for remediation and protection required to ensure the health and safety of the development proposed and its users are identified and implemented.

Paragraphs 120-122 of the NPPF also seek to ensure that sites are suitable for their proposed use and that after remediation; land is not classed as contaminated land. A Geoenvironmental Desktop Study has been submitted which recommends that once the existing Depot building has been demolished and the external hardstanding removed, a supplementary scheme of investigation is implemented to further characterised the ground conditions and concentrations of contaminants.

The Council's Environmental Protection Team supports the approaches taken in respect of contamination. A number of standard conditions are recommended to ensure conformity with Policies EM2 and EM5 of the CDP and Policy EM4 of the emerging Local Plan 2016.

A preliminary unexploded ordnance (UXO) assessment has been carried out which recommends that a detailed UXO threat and risk assessment should be carried out and as such a condition is proposed.

Sustainability

Policy OS4 of the CDP seeks to promote the good stewardship of the natural and built environment whilst the SPD 'Delivering a more sustainable city' also encourages sustainable development. The NPPF states that the purpose of planning is to help achieve sustainable development and one of the core planning principles is to support the transition to a low carbon future. As areas relating to the accessibility of the site have been covered elsewhere in this report, this section will specifically look at the energy efficiency of the development.

A Sustainability Report has been prepared and highlights that an energy efficient design which uses renewable energy technologies has been proposed for the development. The report highlights that the development has been analysed to ensure the benefits of passive design and efficient plant are maximised to reduce the overall energy consumption of the building, prior to the incorporation of low zero carbon/renewable technologies. The report

identifies that combined heat and power (CHP) will be used to achieve the required reduction in carbon emissions and to generate renewable energy on site.

The Sustainability Officer has confirmed that they are comfortable with the approach in the revised Low and Zero Carbon Feasibility Study and that the development is in accordance with Policy DS3 in the emerging Local Plan 2016.

Archaeology

The application site is adjacent to the River Sherbourne and the remains of Shut Lane water mill and as such there is potential for archaeological remains associated with the river and the mill to be present. It is therefore recommended that an archaeological condition be attached to the permission.

Non material planning considerations

A number of comments have been about the use of the site for student accommodation and the perceived view that students bring issues of noise (coming and going from the site), general disturbance, increase in litter and anti-social behavioural issues to a predominately residential area. Whilst an increase in noise levels is a material planning consideration, this is concerned with how the building may be insulated to ensure that future occupiers are protected from noise from outside of the site. The other issues raised in relation to antisocial behaviour are not material planning considerations and consequently cannot be taken into account when assessing the application.

The University Hospitals Coventry and Warwickshire NHS Trust have provided comments on the application and requested a contribution of £26, 129.00. This will be dealt with via a Unilateral Undertaking.

Conclusion

Having regard to the pattern of existing development in the area, representations received and the relevant provisions of the development plan, as summarised below, it is considered that subject to compliance with the suggested conditions and completion of a Unilateral Undertaking for NHS contribution and securing the tenure for students only the proposed development would be in accordance with the development plan.

By virtue of the acceptable design, no adverse impact upon neighbouring amenity, suitable highway impact and appropriateness of the development in all other respects, the proposal is in accordance with Policies OS2, OS3, OS4, OS6, OS7, OS10, EM2, EM4, EM5, EM6, EM8, GE14, GE15, H1, H12, E10, AM1, AM9, AM12, AM22, BE2, BE19, BE20 and BE21 of the Coventry Development Plan 2001, together with relevant SPG/SPD and the NPPF and Policies DS1, DS3, HW1, JE3, H1, H10, GE3, DE1, HE3, AC3, AC4, EM1, EM2, EM3, EM4, EM5 and EM6 of the emerging Local Plan 2016.

CONDITIONS/REASON

1. The development hereby permitted shall begin no later than three years from the date of this permission.

Reason: *To comply with Section 91 of the Town and Country Planning Act 1990.*

2. The development hereby permitted shall be carried out in accordance with the following approved documents;
- Existing and Proposed Site Plan ASK-04-001 P01
 - Existing Block Plan ASK-02-002 P01
 - Proposed Sections ASK-04-001 P01
 - Proposed Site Plan AL-04-000 P01
 - Location Plan AL-02-001 P01
 - Proposed Ground Floor Level ASK-04-001 P01
 - Proposed First Floor Level ASK-04-002 P01
 - Proposed Second Floor Levels AL-04-003 P01
 - Proposed Third Floor Level ASK-04-004 P01
 - Proposed Fourth Floor Level ASK-04-005 P01
 - Proposed Fifth Floor Level ASK-04-006 P01
 - Proposed Roof Plan ASK-04-007 P01
 - Proposed Street Elevations AE-04-000 P01
 - Proposed Harper Road Elevation AE-04-001 P01
 - Proposed North East Elevation AE-04-002 P01
 - Proposed South East Elevation AE-04-003 P01
 - Proposed North West Elevation AE-04-004 P01
 - Ecological Impact Assessment prepared by Ridgeway Ecology
 - Letter from Ridgeway Ecology dated 14/09/2017
 - Flood Risk Assessment prepared by BWB
 - Planning Statement prepared by Day Architectural Ltd
 - Statement of Community Involvement prepared by Day Architecture Ltd
 - Transport Statement prepared by Day Architectural Ltd
 - Preliminary Unexploded Ordnance (UXO) Threat Assessment prepared by Landmark Information Group
 - Noise Assessment prepared by noise.co.uk
 - Knotweed Management Plan prepared by Japanese Knotweed Ltd
 - Ground Investigation prepared by GIP
 - Design and Access Statement prepared by Day Architectural Ltd
 - Policy E8 Justification prepared by D&P Holt
 - Low and Zero Carbon Feasibility Study prepared by Patrick Parsons

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

3. The development hereby approved shall not be occupied unless and until the car parking areas indicated on the approved drawings have been provided and thereafter those areas shall be kept marked out and available for such use at all times.

Reason: *To ensure adequate off-street car parking in the interests of both highway safety and visual amenity in accordance with Policies AM22 of the Coventry Development Plan 2001 and Policy AC1 and Policy AC1 of the emerging Local Plan 2016.*

4. Before the development hereby approved is occupied the redundant existing vehicular access onto Harper Road shall be permanently closed and the footway reinstated in accordance with full engineering details submitted to and approved in writing by the Local Planning Authority.

Reason: *To ensure the safe and free flow of traffic using the adjoining highway in accordance with Policy AM22 of the Coventry Development 2001 and Policy AC1 of the*

emerging Local Plan 2016.

5. The development hereby approved shall not be occupied unless and until the cycle parking and bin storage facilities as indicated on the approved drawings are made available for use and once occupied shall be maintained as such thereafter.

Reason: *In the interests of encouraging the use of alternative modes of transport with the aim of creating a more sustainable city in accordance with Policies OS4 and AM12 of the Coventry Development Plan 2001 and Policies DS3 and AC1 of the emerging Local Plan 2016.*

6. The development hereby approved shall not be occupied unless and until the vehicular access, by means of a vehicular crossover, has been constructed in accordance with a specification to be submitted to and approved in writing by the Local Planning Authority.

Reason: *To ensure an adequate safe access in the interests of both highway safety and visual amenity in accordance with Policies AM22 of the Coventry Development Plan 2001 and Policy AC1 of the emerging Local Plan 2016.*

7. The development hereby permitted shall proceed only in strict accordance with a construction method statement which shall first have been submitted to and approved in writing by the local planning authority prior to the commencement of development. The approved statement shall be strictly adhered to throughout the construction period and shall provide for; the routing of construction vehicles to and from the site; parking of vehicles of site operatives and visitors; the loading and unloading of plant and materials; the storage of plant and materials used in constructing the development; the erection and maintenance of a security hoarding including decorative displays and facilities for public viewing where appropriate; wheel washing facilities and other measures to ensure that any vehicle, plant or equipment leaving the application site does not carry mud or deposit other materials onto the public highway; measures to control the emission of dust and dirt during construction; a scheme for recycling / disposing of waste resulting from demolition and construction works; proposed hours of working; and details of monitoring, recording and reporting of incidents.

Reason: *In the interests of highway safety and the amenities of the occupiers of nearby properties, the free flow of traffic and the visual amenities of the locality and to minimise any adverse environmental impacts in accordance with Policies AM1, EM5 and BE2 of the Coventry Development Plan 2001 and Policies AC1, EM1 and DE1 of the emerging Local Plan 2016.*

8. No development shall take place unless and until a scheme for targeting and utilising local people for the construction of that phase has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the scheme shall be implemented in full accordance with the approved plans.

Reason: *In the interests of promoting employment opportunities for local people in accordance with Policy EM10 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

9. The development shall proceed in accordance with the recommendations set out in the Low and Zero Carbon Feasibility Study prepared by Patrick Parsons . The measures

specified within the approved report shall be incorporated in full into the development and those measures shall remain in place at all times thereafter.

Reason: *To aid sustainable development by ensuring that at least 10% of the development's energy requirements are provided through the on-site generation of renewable/low carbon energy and in the interests of the visual amenities of the area in accordance with Policies OS4 and BE2 of the Coventry Development Plan 2001 and Policies DS3 and DE1 of the emerging Local Plan 2016.*

10. The development shall be carried out only in full accordance with sample details of the external facing and roofing materials and a materials schedule which shall first have been submitted to and approved in writing by the Local Planning Authority.

Reason: *To ensure that the proposed development has a satisfactory external appearance in the interest of visual amenities of the area in accordance with Policy BE2 of the Coventry Development Plan 2001 and Policy DE1 of the emerging Local Plan 2016.*

11. No development shall take place within the application site unless and until the following have been submitted to and approved by the Local Planning Authority:
 - i) A written scheme of investigation for a programme of archaeological evaluation, including post excavation analysis and publication.
 - ii) A strategy for mitigating the impact of the development if archaeological remains are discovered
 - iii) A timetabled programme for post excavation analysis and publication.Once approved the development shall only be undertaken in full accordance with those approved details (or any subsequently approved amendments).

Reason: *In order to ensure any remains of archaeological importance, which help to increase our understanding of the City's historical development are recorded, preserved and protected where applicable, before development commences in accordance with Policy BE15 of the Coventry Development Plan 2001 and Policy HE2 of the emerging Local Plan 2016.*

12. Prior to commencement of development an unexploded ordnance survey shall be carried out to establish whether there is any unexploded ordnance, the details of which shall include any necessary mitigation measures and shall be submitted in writing to the Local Planning Authority. Any necessary measures shall be carried out within the agreed timescale.

Reason: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risk to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

13. Before the development hereby permitted is brought into use details of any proposed plant on the roof top; including any screening, shall be submitted to and approved in writing by the Local Planning Authority. Once approved, such details shall be fully implemented prior to the occupation of the student accommodation and thereafter these measures shall not be removed or altered in any way without the prior written approval of the local planning authority.

Reason: *In order to protect the amenity of adjacent residents and ensure that a high quality design is achieved in accordance with Policies EM5 and BE2 of the Coventry Development Plan 2001 and Policies EM1 and DE1 of the emerging Local Plan 2016.*

14. The development hereby permitted shall only be undertaken in strict accordance with details of both hard and soft landscaping works which have been submitted to and approved in writing by the local planning authority. Details of hard landscaping works shall include boundary treatment, including full details of the proposed boundary walls, railings and gates to be erected, specifying the colour of the railings and gates; footpaths; and hard surfacing which shall be made of porous materials or provision shall be made to direct run-off water from the hard surface to a permeable or porous area. The hard landscaping works shall be completed in full accordance with the approved details within three months of the first occupation of the student accommodation hereby permitted; and all planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the first occupation. Any tree(s) or shrub(s) which within a period of five years from the completion of the development dies, is removed or becomes in the opinion of the local planning authority seriously damaged, defective or diseased shall be replaced in the next planting season with another of similar size and species, unless the local planning authority gives written consent to any variation. All hedging, tree(s) and shrub(s) shall be planted in accordance with British Standard BS 8545:2014 Trees: from nursery to independence in the landscape - Recommendations and BS4428 - Code of Practice for General Landscape Operations.

Reason: *To ensure a satisfactory standard of appearance of the development in the interests of the visual amenities of the area in accordance with Policies BE2 & BE20 of the Coventry Development Plan 2001 and Policy DE1 of the emerging Local Plan 2016.*

15. The development hereby permitted shall take place in accordance with details of all external light fittings and external light columns which shall be submitted to and approved in writing by the Local Planning Authority. Lighting shall be restricted on the canal side and be kept to a minimum at night across the whole site in order to minimise impact on emerging and foraging bats. This could be achieved in the following ways:
1. low pressure sodium lamps should be used in preference to high pressure sodium or mercury lamps;
 2. the brightness of lights should be as low as legally possible;
 3. lighting should be timed to provide some dark periods;
 4. connections to areas important for foraging should contain unlit stretches.
- The development shall thereafter be carried out in accordance with the approved measures.

Reason: *In order to protect the river corridor and its habitat which provides commuting and foraging habitat for bats and habitats for nesting birds, amphibians and hedgehogs in accordance with Policies GE14 and GE15 of the Coventry Development Plan 2001 and Policies GE2 and GE3 of the emerging Local Plan 2016.*

16. The development hereby permitted shall not commence unless and until a Construction and Ecological Management Plan has been submitted to and approved in writing by the Local Planning Authority. The report should contain pre-commencement checks for breeding birds, otter, water voles and hedgehog, and appropriate working practices and safeguards for wildlife that are to be employed whilst works are taking place on site. The development shall thereafter be carried out in accordance with the approved Construction and Ecological Management Plan.

Reason: *To ensure that protected species are not harmed by the development in accordance with Policies GE14 of the Coventry Development Plan 2001 and Policies GE2 and GE3 of the emerging Local Plan 2016.*

17. Notwithstanding the details submitted within the Flood Risk Assessment, prior to development commencing the following information shall be submitted to and approved by the Local Planning Authority:
- i) A scheme for the provision of surface water drainage, fully incorporating a Sustainable Drainage System (SuDS) with particular emphasis on attenuation techniques;
 - ii) A detailed strategy for the long-term maintenance of the SuDS and other surface water drainage systems on site;
 - iii) An appropriately scaled flood risk assessment to establish the risk to the development, as well as the appropriate mitigation measures. The surface water flood mapping indicates that the site is vulnerable to surface water flooding;
 - iv) Provisions for the drainage of the site to ensure that there are no temporary increases in flood risk, on or off the site, during the construction phase;
 - v) Evidence to demonstrate the management of overland flow routes in the event of exceedance or blockage to the drainage system. Details shall include demonstration of how the buildings will be protected in such an event;
 - vi) Information which demonstrates that there will be no discharge of surface water to the public highway;
 - vii) Evidence to demonstrate that finished floor slab levels must be 300mm above the 1 in 100year pluvial flood levels, and above the 1 in 1000 year fluvial flood levels; and
 - viii) All 'within development plot' drainage must be considered for the incorporation of water re-use systems, such as grey water harvesting, to manage down both peak and total rainfall runoff discharging to sewer systems, watercourses and groundwater.
- Once approved, the development shall only proceed in accordance with the approved details including any recommended mitigation measures and shall remain in place thereafter.

Reason: *To ensure that a satisfactory means of drainage is provided to minimise flooding and which promotes and maintains the good stewardship of the natural and built environment in accordance with Policy EM4 of the Coventry Development Plan 2001 and Policies EM4 and EM5 of the emerging Local Plan 2016.*

18. The development hereby permitted shall proceed in accordance with details contained within Section 10 (Results) of the Noise Assessment dated 20th September 2017 prepared by noise.co.uk. Once implemented the details contained within the Noise Assessment shall thereafter be retained.

Reason: *In the interest of protecting the amenity of future occupiers of the development and occupiers of nearby properties in accordance with Policy EM5 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

19. An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site and any report of the findings must be submitted to and approved in writing by the local planning authority prior to first occupation. The report of the findings, to be conducted in accordance with DEFRA and the Environment Agency's 'Model

Procedures for the Management of Land Contamination, CLR 11', must include:

- (i) A survey of the extent, scale and nature of contamination;
- (ii) An assessment of the potential risk to;
 - Human health,
 - Property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - Adjoining land,
 - Groundwater's and surface waters,
 - Ecological systems,
 - Archaeological sites and ancient monument;
- (iii) An appraisal of remedial options, and proposal of the preferred option(s).

Reason: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

20. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development (excluding demolition) other than that required to carry out remediation. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Reason: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

21. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.

22. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 19, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 20, which shall be submitted to and approved in writing by the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 21.

Reason: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

23. The development hereby permitted shall proceed in accordance with the details contained within the Knotweed Management Plan (Remediation Report) dated 21 September 2017 prepared by Japanese Knotweed Ltd. Following completion of measures identified in the approved remediation scheme, a verification report confirming that the treatment has been completed shall be submitted to and approved in writing by the Local Planning Authority.

Reason: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled water, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy EM6 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

24. Notwithstanding the submitted drawing 556-17 illustrating the relationship to the River Sherbourne, prior to commencement of development (including demolition) a scheme and implementation strategy shall be submitted to and approved in writing by the LPA that makes provision for a riverside walk link route along the eastern edge of the site. This scheme shall include location of the walkway, materials, landscaping, levels and future access within an 8 metre strip. The development shall be carried out in accordance with the approved details.

Reason: *To enhance local connectivity in accordance with BE2 of the Coventry Development Plan 2001 and Policy DE1 of the emerging Local Plan 2017.*

25. Notwithstanding the submitted Air Quality Assessment prepared by Patrick Parson, prior to commencement of development an Air Quality Assessment which includes modelling undertaken in accordance with TG16 of both traffic sources and emissions from the Combined Heat Power Plant shall be submitted to and approved in writing by the Local Planning Authority.

Reason: *In the interest of protecting the amenity of future occupiers of the development and occupiers of nearby properties in accordance with Policy EM5 of the Coventry Development Plan 2001 and Policy EM1 of the emerging Local Plan 2016.*

26. Notwithstanding the Student Management Plan submitted with the application, prior to the occupation of the building, a Student Management Plan detailing the how the arrival and departure of students will be managed shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter take place in accordance with the approved report.

Reason: *In order to minimise the disruption of parking within Harper Road in accordance with Policy AM22 of the Coventry Development Plan 2001 and Policies H10 and AC3 of the emerging Local Plan 2016.*

[Proposed Site Plan](#)

[Proposed Ground Floor Level](#)

[Relationship to River Sherbourne Sketch](#)

[Existing & Proposed Site Plan 8m Easement](#)

[Proposed Sections](#)

[Site Location Plan](#)

[Proposed Elevations 04 North West Elevations](#)

[Proposed Elevations 03 South East Elevations](#)

[Proposed Elevations 02 North East Street Elevations](#)

[Proposed Elevations 01 Harper Road Street Elevations](#)

[Proposed Street Elevations](#)

