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12 September 2022

Dear Sir/Madam

KINGS SOMBORNE NEIGHBOURHOOD PLAN REGULATION 14 CONSULTATION: REPRESENTATIONS ON BEHALF OF SHOREWOOD HOMES AND THE DIOCESE OF WINCHESTER

On behalf of Shorewood Homes and The Diocese of Winchester ('SH & DOW'), please find enclosed representations submitted to King's Somborne Parish Council ('KSPC') regarding the current consultation upon its Regulation 14 version draft Neighbourhood Plan ('Reg 14 NP') and associated evidence documents.

SH & DOW have interests in the land known as 'Land east of Furzedown Road, Kings Somborne' (hereafter, 'the Site').

SITE AND BACKGROUND

Site Description

The Site extends to 2.5 hectares and is split into two distinct areas.

A Location Plan is included at **Appendix 1**.

The western part is currently laid out and used as allotments, with pedestrian access from Furzedown Road. There is no vehicular access to the western part, which sits on an elevated position compared to the road. The eastern part lies immediately to the east of the existing allotments and is currently in agricultural use and has no access from Furzedown Road. It is generally flat, rising gently towards the south eastern corner.

Proposals

A previous scheme sought the redevelopment of the allotments for residential use and the creation of a new allotment on land to the south. This was refused by TVBC based on the location of the re-provided allotments and was consequently dismissed by an Inspector at appeal for the same reason.

A new hybrid planning application (ref: 22/01359/OUTS) was submitted to TVBC in May 2022 and is currently under consideration but is expected to be determined within the next few months.

New Housing

Upon the western part of the Site, outline consent with all matters reserved except for access is sought for 18 dwellings. Access is detailed to give comfort that the Site can be accessed in an acceptable manor. The current hybrid application retains the same housing scheme previously submitted which was not subject to any statutory objections.

The proposed housing mix as follows:

	Market	m²	Affordable	m²
1-bed	1	50	3	50
2-bed	3	130	2	90
3-bed	5	170	2	130
4-bed	2	205	0	N/A
TOTAL	11		7	

An indicative site plan (**Figure 1**) shows that this quantum of development on site can be achieved.

The indicative site plan layout shows an area of 750m² of open space to the centre of the site with housing arranged around it. There is a further 605m² of open space either side of the access road. It also shows that the site could accommodate appropriate levels of parking for the size of the dwelling.

A new access is proposed off Furzedown Road to the residential site.



Figure 1: Indicative Site Plan (plan ref: 7683/D103_Rev N – as submitted with hybrid application)

Relocated Allotments

Upon the eastern part, directly adjacent to the existing allotments, full planning permission is sought for the change of use of land to create allotments with associated access, erection of a storage/toilet building and creation of a car parking area. Compared to previous proposals, the new allotments will be directly adjacent to the existing allotment site to the east.

Vehicular and pedestrian access to the allotments will be from the same access as the residential site. The site is as close to the existing allotment site as possible, being only a slightly longer walk than the existing (i.e. through the existing allotment site). The site has broadly the same topography as the existing allotment site and does not directly overlook any dwellings, existing or proposed.

The area of existing allotments is 9,021m² and the new allotments will be an area of 9,617m² (excluding the car parking area and toilet and storage building), thus the replacement allotments are slightly larger in area.

As was previously the case, the new allotment soil will be improved to be the same quality as the existing allotments prior to their use. Moreover, a range of improvements over and above the existing allotments are proposed as follows:

- A new storage building for allotment holders to store equipment;

- A composting toilet;
- Water taps throughout the allotment site;
- Raised beds and all-weather paths in part of the site for disabled users; and
- Vehicular access and car parking for delivery of materials and disabled users.

The new provision will increase accessibility to elderly and mobility challenged users with the introduction of a car parking area, a toilet, all weather paths and raised beds. This will make the village allotments more inclusive and truly available to all, which is not currently the case at the existing allotments.

In addition to the above, as previously offered, Shorewood Homes will help allotment holders move from one allotment site to the other between September and March in a specified year.

RELEVANT LEGAL AND POLICY CONTEXT

The Parish of King's Somborne falls within the administrative area of Test Valley Borough Council (**'TVBC'**). The Development Plan of TVBC comprises solely of the Test Valley Revised Local Plan 2029 (adopted January 2016) (**'Local Plan'**).

To be 'made', a Neighbourhood Plan must be considered to meet the 'basic conditions' set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). Whilst they are not required to be demonstrated at this Regulation 14 stage, they remain an appropriate means through which to assess the content of this Reg 14 NP. The basic conditions require a Neighbourhood Plan to:

- Have regard to national policies and advice contained in guidance by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with strategic policies contained in the Development Plan of the LPA (i.e. the Local Plan); and
- Not breach, or otherwise be incompatible with, EU obligations.

PPG Paragraph 041 (Reference ID: 41-041-20140306) confirms policies within a Neighbourhood Plan should be:

- clear and unambiguous;
- drafted with sufficient clarity that a decision-maker can apply it consistently and with confidence when determining planning applications;
- concise, precise and supported by appropriate evidence; and
- distinct, to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.

REPRESENTATIONS

Draft Policy KS/H1 – Quantity of New Homes Needed

The following is an answer to ‘The Policies’ survey.

SH & DOW **supports** the decision of KSPC to seek to allocate land for 41 homes in draft Policy KS/H1.

However, as is demonstrated in these representations, identified site allocations are insufficient to meet this need. SH & DOW consider additional site allocations are required.

Site Allocations

The following is an answer to ‘The Plan’ survey:

(4. Development and Design, Site Allocations – 4.14 to 4.18 – pages 34 and 35)

SH & DOW has undertaken analysis of the four proposed site allocations and has **significant concerns** that the site allocations are not developable, or a lack of evidence has been provided on the ability for them to be developed.

In particular, it is noted that the densities proposed are out-of-keeping with acceptable densities in the village of King’s Somborne and surrounding villages in Test Valley consented or recently proposed, as set out in the table below:

Address	Planning Ref.	Dwellings (No.)	Site Area (ha)	Dwellings per Hectare
Land north west of Evans Close, Over Wallop	14/02739/OUT	35	2.20	16dph
Kents Orchard, Houghton	16/00642/FUL	6	0.75	8dph
Hyde Farm, Broughton	18/00877/FUL	9	1.01	9pdh
Houghton Farm, Houghton	19/02293/FUL	13	0.98	13dph
Land adjoining Tallet Manor, Stockbridge	19/01914/OUT	3	0.42	7dph
Ro-dor Ltd, Stevens Drove, Houghton	22/00217/OUT*	6	0.31	19dph
Williams Garage, Salisbury Road, Abbots Ann	22/00833/FUL*	5	0.22	23pdh

The table above indicates that consented sites and recent development have barely reached greater than 20dph. Taking this as a conservative estimate of acceptable density and applying this to the existing site

allocations, it is considered **just 20 dwellings** can be accommodated in the proposed site allocations – a shortfall of 21 dwellings.

Specific analysis is provided on each allocation and a summary table of constraints and appropriate housing densities is outlined below:

Site	Proposed Dwellings (Allocation)	Achievable Dwellings (No.)	Unevidenced / unresolved constraints
KS148b: Land at Spencer’s Farm (South)	14	7	<ul style="list-style-type: none"> • Suitability of Muss Lane for access • Access from Muss Lane owned by third party
SHELAA 55: Land East of Furzedown Road	10	5	<ul style="list-style-type: none"> • Access in third party ownership • Landscape / visual impact
SHELAA 168: Land east of Eldon Road	10	5	<ul style="list-style-type: none"> • Landscape / visual impact
KS3: Land off Froghole Road	7	3	<ul style="list-style-type: none"> • Access potentially in third party ownership • Impact on Grade II listed buildings • Visibility splay in third party ownership
TOTAL	41	20	

SH & DOW consider additional evidence on the deliverability of the sites proposed is required. In any case, additional site allocations will be required to meet the shortfall. This could be sufficiently accommodated by allocation of the SH & DOW’s land interests, which itself is proposed at an acceptable density of 18dph.

The Site Options and Assessment Report (April 2021) prepared by AECOM supports the Reg 14 NP and assesses the suitability of land promoted in the Parish for allocation. It should be noted that no sites are considered suitable outright, but several are identified as ‘potentially suitable’ – including the residential element of SH & DOW’s site (i.e. the existing allotments). This is assessed at reference Site 186 (‘Allotments, Furzedown Road’).

For Site 186, the Report (pg. 40) concludes that *'the site is potentially suitable for allocation subject to resolving or mitigating identified constraints including provision of access and ensuring the re-provision of the allotment for the community at an alternative site'*.

As has been submitted in the hybrid planning application and covered in these representations, a new access is proposed off Furzedown Road to the site. Hampshire County Council has confirmed this access acceptable and has raised no objection. The current allotments would be provided in a suitable location adjacent to the east of the current location, provided in a greater size and with a greater standard of facilities.

The constraints identified on the Site can be considered to have been resolved or mitigated, thus making it suitable for allocation. Given the identified shortfall of 21 dwellings, SH & DOW urge KSPC to consider the allocation of its Site.

KS148b – Land at Spencer's Farm (South)

The following is an answer to 'The Plan' and 'The Policies' survey.

SH & DOW **objects** to this site allocation.

KS148b is allocated for 14 dwellings on a developable area of 0.31ha, equating to a housing density of 45 dwellings per hectare (dph). This far exceeds our evidenced assumption of 20dph, which when applied to the site, would result in yield of just **7 dwellings**.

Moreover, it is noted that a KSPC objection to a planning application on an adjacent site (Muss Lane) for five dwellings (ref: 18/03347/FUL) stated that *'members supported the comments received from neighbours that to build 5 houses was overdevelopment'*. The developable area for this application was approximately 0.24 ha, equating to a housing density of 20dph. Therefore, if KSPC considered this density as 'overdevelopment,' the ability of the adjoining site to accommodate 45dph is clearly flawed.

The site is proposed to be accessed from the A3057. A Site Access Study evidence document supports the Reg 14 NP and has been published for consultation. This document provides a summary of access suitability and constraints based upon the advice of a private highways consultant (Nick Culhane) and the local highway authority (Hampshire County Council). Opinions are included at the rear of the Study. The Study states in its summary of KS148b (pg. 17) that *'access can be provided directly from A3057'*.

However, Nick Culhane concludes this would not be acceptable from a highways perspective, given visibility restrictions onto the A3057, particularly as traffic speeds are above 30mph meaning that appropriate visibility splays would be difficult to achieve. An alternative site access via Muss Lane is also unsuitable, given the width, alignment and on-street parking that occurs in this access road. SH & DOW agree with the conclusions and Nick Culhane and would add that the section of Muss Lane providing access to the proposed site is also in third party ownership (Aster Communities) and it is unclear whether the landowner has an agreement with Aster Communities to allow access. Without an agreement, there is a ransom

scenario which could affect the viability and deliverability of the site if accessed from this location. While Hampshire County Council state the overall principle of access from the A3057 is acceptable, it retains “some specific concern [...] in highways terms for this site”. This brings into question the overall deliverability of this allocation.

The Regulation 14 NP states (paragraph 4.21, pg. 37) ‘The Northern part of the site is visible in long distance views’ and ‘Development where practical should be limited to the lower southern side’. This would therefore indicate that there is minimal opportunity to increase this developable area without impacting on the wider landscape.

Given the issues of achieving an appropriate site access and a realistic density, SH & DOW suggest that the site is re-appraised for highways safety assuming a seven-dwelling scheme. It should also be specified whether the landowner has an agreement with Aster Communities to access the site from Muss Lane.

SHELAA 55 – Land East of Furzedown Road

The following is an answer to ‘The Plan’ and ‘The Policies’ survey.

SH & DOW **objects** to this site allocation.

Due to potential landscape and visual impacts of this site, only a small developable area at the base of the valley has been included within the allocation area. The allocation proposes the site can accommodate 10 dwellings on a developable area of 0.22ha (0.54 acres), correlating to a density of 44dph.

This far exceeds our conservative 20dph estimate of appropriate density in this area, which when applied to this site, would result in yield of just **5 dwellings**.

Due to the sensitivity of the site in terms of landscape impact, there is little opportunity to increase this developable area to accommodate additional housing as required to meet a housing target of 10 for the site.

The site is proposed to be access off The Gorings. Although Nick Culhane did not flag this as unsuitable in his opinion at the rear of the Site Access Study, this does require access over third party land owned by Aster Communities (see below, highlighted green). In absence of an agreement with Aster Communities, this proposed access is unviable.



The Reg 14 NP (paragraph 4.22, pg. 38) states *'there is no defensible boundary on the western edge which could lead to further encroachment into the countryside'*. This establishes the existing landscape features would not enable the development to positively integrate into the landscape character area, subsequently relying upon proposed landscaping to satisfy Policy E2 of the Local Plan. While there is some proposed screening/boundary mitigation, this would be unlikely to integrate into the wider landscape character when the site only loosely adjoins the existing settlement on the eastern boundary and where the remaining surrounding landscape consists of open field. The proposed site is an illogical extension to the settlement boundary.

We would suggest that the provision of access is evidenced and the site is reappraised for five dwellings. This should include a Landscape Visual Impact Assessment.

SHELAA 168 – Land East of Eldon Road

The following is an answer to 'The Plan' and 'The Policies' survey.

SH & DOW **objects** to this site allocation.

The site is proposed for 10 dwellings on a developable area of 0.22ha (0.54 acres), equating to around 44dph. This far exceeds our conservative 20dph estimate of appropriate density in this area, which when applied to this site, would result in yield of just **5 dwellings**.

Development is limited to a small section of the overall site. It is stated in the Regulation 14 NP (paragraph 4.23, pg. 41) that *'The Southern boundary is adjacent to a Groundwater Protection Zone whilst part of the site is vulnerable surface water flooding and lies in Flood Zones 2/3'*. The allocation itself therefore requires (Point 7.) *'Development to directed tom land within low risk of surface water flooding [...]'*. There is limited opportunity to expand this developable area to accommodate additional housing due to this.

The landscape impact of a larger developable area on the surrounding landscape is questionable. A reason for refusal on a previous application submitted on this site by Gladman Developments Ltd in April 2017 (ref. 16/02378/OUT) was *'the detriment of the prevailing landscape character and established countryside setting, particularly in medium and longer-range views from the south and south-east of the application site, the impact of which would outweigh the benefits arising from the delivery of additional housing in this location'*. These views are predominantly into the rest of the site, excluding the area proposed to be allocated, but this further emphasises the limited area in which development could potentially be achievable at SHELAA 168.

The opinion of Nick Culhane at the rear of the Site Access Study notes that *'Eldon Road beyond Hunters Close is restricted in width, however a wide verge exists on the eastern side which would allow for some localised widening, including a short section of pedestrian footway'*. However, this road widening comes at extra cost and if required for the development it could affect viability especially if the site is only suitable for up to five dwellings.

KS3 – Land off Froghole Road

The following is an answer to 'The Plan' and 'The Policies' survey.

SH & DOW **objects** to this site allocation.

The Regulation 14 pre-submission document states that the site is suitable for seven dwellings with a developable area of 0.15ha (0.38 acres). This equates to a housing density of 44dph. This far exceeds our conservative 20dph estimate of appropriate density in this area, which when applied to this site, would result in yield of just **3 dwellings**.

The proposed access for this site is from Cow Drove Hill / Highfield, which turns into an unmade track. It is unclear as to the land ownership of this track, as the land is unregistered. If it is not owned by the landowner, then accessing over third-party land could result in a ransom scenario. This track also appears to be a narrow single track whereby two cars would not be able to pass each other. The northern visibility splay onto Cow Drove Hill is noted by Nick Culhane in his opinion at the rear of the Site Access Study as being obscured by a hedge in third party ownership. The alternative access from Froghole Lane was already identified as being unsuitable due to its narrow width. There are no other suitable access options to the site. Nick Culhane suggests in his opinion that the local Highway Authority would not look favourably on the site unless visibility could be adequately resolved. Hampshire County Council, in its advice, provides some guidance on achieving sufficient visibility, but highlights risk given the size of the development. It is unclear whether the landowner for KS3 has agreements with these third parties. In the absence of any agreement, the site cannot be assumed as deliverable.

The Regulation 14 NP states (paragraph 4.24, pg. 43) *'The site is valuable for the contribution it makes as an open space within the Conservation Area and the setting it provides to nearby listed buildings'*. The heritage impact of development here is questionable, given its proximity to nearby listed buildings and impact

on the setting of the listed buildings and Conservation Area. For example, the proposed site access runs adjacent to a Grade II listed cobb wall (see image below):



Moreover, half of the site is within Flood Zone 2 & 3, further limiting the developable area.

SH & DOW request that this site is reappraised for the provision of three dwellings and clarity on whether there is an agreement with third party landowners to provide a suitable access and visibility splay.

KS/E1 – Preserving Landscape Features, Views and Surrounding Farmland

The following is an answer to ‘The Policies’ survey.

SH & DOW object to Part 2 of draft Policy KS/E1.

The use of contours (Figure 1 of the Reg 14 NP, pg. 15) and stipulation that development will not be permitted if it increases the prominence of the village up the valley sides above a 40m contour is not supported by any appropriate evidence – in contrary to PPG¹. Part 2 of draft Policy KS/E1 should therefore be deleted.

In any case, the undertaking of a Landscape Appraisal / LVIA with consideration of landscape evidence base of the Local Plan (as per Part 1) would be sufficient to understand and assess any impact.

¹ PPG Paragraph 041 (Reference ID: 41-041-20140306)

KS/E3 – Local Green Space

The following is an answer to 'The Policies' survey.

Shorewood Homes **object** to the inclusion of 'Allotments – Furzedown Road' (KSLGS05) as a Local Green Space (LGS) in draft Policy KS/E3.

Principally, the need for additional protection to the allotments in the form of LGS is questionable. Policy mechanisms are already in place (via Policy LWH1 of the Local Plan and draft Policy KS/F1) that afford protection to this communal asset unless it can be demonstrated otherwise.

Notwithstanding the above, a basic condition of a Neighbourhood Plan is that it should contribute to the achievement of sustainable development. To contribute to sustainable development, PPG confirms *“sufficient and proportionate evidence should be presented on how it guides development to sustainable solutions”*.

Achieving sustainable development means taking opportunities to secure net gains across economic, social and environmental objectives (NPPF Paragraph 8). Planning policies should ultimately play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (NPPF Paragraph 9).

SH & DOW consider the identification of KSLG05 as a LGS would be premature and unsustainable, in light of its proposals to create a larger and improved area of allotments adjacent to the east of the current site, whilst delivering homes on the current allotment site.

SH & DOW expresses its concerns with the listed quantum and quality of site allocations elsewhere in these representations (see comments on 'Site Allocations'). As such, SH & DOW consider sufficient land has only been identified for 20 dwellings rather than the 41 dwellings as stated and committed to under draft Policy KS/H1. KSPC therefore needs to identify additional land for housing, 18 of which can be delivered under SH & DOW's proposals.

Within proposals put forward in the current hybrid planning application, the re-provided allotments will be of a greater size (9,617m² vs. 9,012m²), providing space which would also cover (in excess) the additional requirements for the proposed residential development. A range of improvements over and above the existing allotments are also proposed.

In conclusion, given insufficient housing allocations in the Reg 14 NP to meet identified need, the decision to identify 'Allotments – Furzedown Road' (KSLGS05) as LGS would not contribute to the achievement of sustainable development. The proposals put forward by SH & DOW would allow the provision of much-needed housing in a sustainable location, whilst retaining (and improving) an area of community importance. This must be viewed as a preferable solution that ensures 'net gains' across the general objectives of sustainable development outlined at paragraph 9 of the NPPF.

'Allotments – Furzedown Road' (KSLGS05) should therefore be removed as a LGS and its proposals adopted by KSPC as a sustainable solution to development.

KS/F1 – Community Assets

The following is an answer to 'The Policies' survey.

SH & DOW **objects** to the content of draft Policy KS/F1.

The current allotments are identified ('Allotments – Furzedown Road') as a 'Key Community Facility / Asset' in the table at page 47 of the Reg 14 NP. While it is recognised that allotments and other open space and recreation facilities are community facilities/assets, Policy LHW1 (Public Open Space) of the Local Plan should be added to the 'Key Test Valley Local Plan policies' in the box underneath paragraph 5.4 (page 46).

The latter parts of Policy LHW1 lists circumstances where the loss of existing open spaces or other recreation facilities will be permitted:

"Development proposals that would result in the loss of existing open spaces or other recreation facilities will only be permitted if:

- d) the space of facility is not needed to meet the full range of leisure and recreational needs of the local community;*
- e) the proposed development is for an alternative open space, sport or recreation facility for which there is such a need as to outweigh the loss; or*
- f) any space of facility to be lost would be replaced by an equivalent or better provision in terms of quantity and quality and be in a sustainable location"*

The proposals of SH & DOW are seeking consent for a replacement area of allotments on land to the east of the existing allotments. The replacement of the provision is of the same quantum (9,021m²) as that lost plus more than is required to be provided by the residential development (156m²). The proposed facilities at the replacement allotments are significantly better than the existing which includes the following improved facilities:

- A pedestrian and vehicular access to the site,
- A car parking area,
- A communal storage building,
- A toilet,
- Deer fencing,
- All weather paths,
- Raised beds, and
- Water provision.

The proposed location of the allotment site is in a suitable location, in that it is in close proximity to the existing allotments and it can be easily accessed from the village. The requirements of Policy LHW1 are therefore more than fully met.

Accordingly, the current policy (as drafted) does not provide sufficient account of Policy LH1 of the Local Plan. The following revision is suggested:

“Planning permission for proposals that support and safeguard the future of community facilities identified above will be supported. Proposals that involve their loss will be permitted only where relevant criterion for that use is satisfied as per Policy COM14 and Policy LWH1 of the Test Valley Local Plan”

CONCLUSIONS

SH & DOW recognises the work KSPC has undertaken in reaching this Regulation 14 consultation stage. However, these representations have identified several areas for revision and/or improvement:

- The four proposed site allocations are not developable, or a lack of evidence has been provided on the ability for them to be developed. In particular, it is noted that the densities proposed are out-of-keeping with acceptable densities in the village and surrounding villages of Test Valley consented or recently proposed. Taking this into account, the level of allocated housing provision falls from 41 dwellings to 20 dwellings – a shortfall of 21 dwellings. Additional evidence on the deliverability of the sites allocations proposed is required, and in any case, it is considered additional site allocations will be required to meet the shortfall.
- The Site Options and Assessment Report (April 2021) prepared by AECOM and supporting the Reg 14 NP has identified the residential element of SH & DOW’s site (i.e. the existing allotments) as *‘potentially suitable for allocation subject to resolving or mitigating identified constraints including provision of access and ensuring the re-provision of the allotment for the community at an alternative site’*. The information contained within the hybrid planning application and these representations has confirmed that these constraints can appropriately be overcome. Accordingly, SH & DOW urge KSPC to consider the allocation of its site.
- Removal of Part 2 of draft Policy KS/E1 (Preserving Landscape Features, Views and Surrounding Farmland) as its provisions are not evidenced and are overall redundant given the provisions of Part 1 of the draft Policy.
- Removal of ‘Allotments – Furzedown Road’ (KSLGS05) as a Local Green Space from draft Policy KS/E3 (Local Green Space), as sufficient protection to this site is already provided by other policies in the Local Plan (Policy LHW1) and Reg 14 NP (draft Policy KS/F1). Moreover, inclusion of this site would restrict the bringing forward of residential development required to address the shortfall of 29 dwellings

in the NP, which would include the re-provision of allotments of a greater size and quality on an adjacent site.

- Sufficient clarification to draft Policy KS/F1 (Community Assets) to accommodate the provisions of Policy COM14 and Policy LWH1 of the Local Plan, allowing for the loss of community uses (including open spaces and recreational facilities) where sufficiently justified.

SH & DOW urge KSPC to consider the allocation of its Site for residential purposes (thus addressing an apparent housing shortfall in the draft Neighbourhood Plan) as well as the re-provision of allotments of a greater size and of greater quality in a suitable location close to the site provides an excellent opportunity to secure net gains for the objectives of sustainable development. SH & DOW would welcome further discussions to take place with KSPC and TVBC to rectify issues and reach a suitable solution.

We trust these representations are clear. Should you have any queries, please do not hesitate to contact myself or James Ellis (james.ellis@carterjonas.co.uk).

Yours faithfully,



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APPENDIX 1 – LOCATION PLAN