

Item: 5.5

Planning Committee: 2 September 2020.

Erect 3 Houses with Air Source Heat Pumps at Cairston Road, Stromness.

Report by Executive Director of Development and Infrastructure.

1. Summary

1.1.

It is proposed to erect three houses at Cairston Road, Stromness. The application follows an existing planning consent 19/376/PP for 13 houses, which was granted by the Planning Committee on 4 March 2020. The current planning application site comprises an area of the previous planning application site which was not subject to housing development. Part of the current planning application site is allocated for housing development within the Local Development Plan. However, due to the proposed density of development, proposed development outside the housing allocation, and development within the buffer to a watercourse, the development is considered contrary to Policies 1, 2, 5A and 10B of the Orkney Local Development Plan 2017. Accordingly, the application is recommended for refusal.

Application Number:	20/222/PP.
Application Type:	Planning Permission.
Proposal:	Erect three houses with air source heat pumps.
Applicant:	Orkney Builders, 10 Crowness Road, Hatston, Kirkwall, KW15 1RG.
Agent:	Bracewell Stirling, c/o Kirsty Montgomery, 5 Ness Bank, Inverness, IV2 4SF.

1.2.

All application documents (including plans, consultation responses and representations) are available for members to view at the following website address:

https://www.orkney.gov.uk/Service-Directory/D/application_search_submission.htm
(then enter the application number given above).

2. Consultations

2.1.

Consultation responses from Engineering Services, Environmental Health, Roads Services and Scottish Water did not raise any technical matters which could not be addressed by planning condition.

2.2.

A detailed consultation response has been provided by Development and Marine Planning, addressing various issues as summarised in the following paragraphs.

2.2.1. Allocation of Land

“This application is located partly on the Stromness Housing Allocation of STR-6 and partly on an area of land that is allocated as Strategic Open Space. All allocations are as of the Orkney Local Development Plan 2017.

On STR-6, the developer has already gained planning permission for the erection of 13 houses (19/376/PP – 10th March 2020).

Strategic Open Space.

Part of the proposed site is allocated as Strategic Open Space. The allocated Strategic Open Space forms part of a larger open space allocation that is associated with the neighbouring Millennium Wood and Mill Burn. This space is considered to be important in the local community and of value because of its biodiversity value associated with the native tree planting and the burn. Additionally, it provides an area of green amenity for the town that provides a green link between the two schools.

As this element of the strategic open space is privately owned by the applicant its ability to function as strategic open space is limited. It provides a small fraction of the overall space. It should be noted that the planning application does not detail any compensatory provision for the proposed loss of part of this strategic open space.”

2.2.2. Buffer to the Watercourse

“The Mill Burn is an example of the habitat ‘Burns and Canalised Burns’ which is identified in the Orkney Local Biodiversity Action Plan as a locally important habitat for conservation. This part of the burn follows a naturally meandering route and the low-lying areas on either side support tall bankside vegetation which provides habitat and cover for wildlife.

The burn is located on the boundary of the housing allocation and within the planning site for this development proposal. An appropriate development free buffer is required to ensure that the protection and enhancement of the water course and to allow for sustainable flood management. Details on Buffer Strips are provided in the Scottish Environment Protection Agency’s Planning Background Paper: Water Environment...

Buffer strips should be maintained in permanent vegetation that helps to control soil and water quality, promote and protect biodiversity and assist in the development of green networks. For this water course, Development and Marine Planning would expect a buffer of 6 metres or greater. The size for a development free buffer should consider site conditions, topography, flood risk, pollution control pressures, physical conditions, climate change mitigation, native species habitats, active travel and recreation. We consider ‘development free’ as being outwith domestic curtilages and maintained in natural vegetation.”

2.2.3. Priority Marine Feature – Sea Trout

“Surveys undertaken by the Orkney Trout Fishing Association have identified the presence of Sea Trout, a migratory fish, in the Mill Burn. The Sea Trout is a Priority Marine Feature (PMF) and is identified in the Scottish Biodiversity List as a priority for conservation. Sea Trout spawn and spend the early stages of their lifecycle in freshwater burns and rivers where they are vulnerable to water-borne pollution, habitat degradation, e.g. smothering due to siltation, as well as any activity which introduces barriers to their migration.

An appropriately sized development free buffer will prevent damage to the aquatic and bankside habitats of the burn and deterioration of its water quality.”

2.2.4. European Protected Species – Otter

“The Mill Burn flows adjacent to the southern boundary of the proposed development site before exiting to the sea at the head of Hamnavoe. Otters are likely to be active in the area, alternating between the marine environment and the burn.

Otter is classed as a European Protected Species (EPS) and is therefore afforded a strict level of protection under UK legislation...

Development and Marine Planning recommend that a survey is undertaken to ascertain the level of otter usage along the Mill Burn and within the surrounding area and to determine any species licensing requirement.”

2.2.5. Management of Excavated Materials

“Careful consideration should be given to any planned onsite storage of excavated soils, as stockpiles of bare soil are vulnerable to erosion, particularly during wet weather. Poorly sited stockpiles may pose a risk to watercourses. Areas in the vicinity of drainage ditches and other waterbodies should therefore be avoided, when identifying the locations of temporary laydown areas for materials and soil storage. Development and Marine Planning request a soil management plan is provided to and agreed with the Planning Authority and included in a Construction Environment Management Plan (CEMP) before construction commences on site.

Invasive non-native species

Salmonberry, a species which is not native to Orkney, is present along the western boundary of site STR-6 and some stems and roots of the plant may have been incorporated into the stored topsoil when the site was cleared. Salmonberry is fast growing and invasive and, when released into the countryside, can quickly outcompete other vegetation...

In Scotland, it is an offence to plant or otherwise cause to grow a plant in the wild at a location outside its native range.

It is important therefore that the stored topsoil remains onsite where any future growth of salmonberry can be treated. It should not be offered to other landowners, e.g. for agricultural use or used as landfill.”

3. Representations

No representations have been received.

4. Relevant Planning and Site History

4.1. Application 19/376/PP.

Reference.	Proposal.	Location.	Decision.	Date issued.
19/376/PP	Erect 13 houses, upgrade an access and construct a road and drainage works.	Cairston Road, Stromness.	Approved with conditions.	09.03.20.

4.1.1.

The above planning application was approved, with eight planning conditions attached. The reasons for those conditions are summarised as follows:

- 01. Construction Method Statement.
- 02. Affordable housing.
- 03. Footpath link.
- 04. Scheme of Landscaping.
- 05. Road surfacing.
- 06. Finishing materials.
- 07. Surface water drainage.
- 08. Hours of construction.

4.1.2.

Conditions 01, 02, 03 and 04 are pre-commencement, requiring details to be submitted to, and agreed in writing by, the Planning Authority prior to commencement of development. The Notification of Initiation of Development was received on 16 June 2020, confirming that works had commenced on 8 June 2020. It is an important function of the Planning Authority to control development sites, particularly in sensitive locations which have houses and/or environmental features adjacent, as is the case at Cairston Road. Planning Authority control includes matters such as temporary buildings, storage of excavated and building materials, movement of plant, dust-generating activities, noise-generating activities and site lighting.

4.1.3.

On the basis those matters had not been agreed prior to commencement as required, the agent was contacted by the Planning Authority on 17 June 2020 and, following submission of some information, again on 23 June 2020, confirming that the information submitted was not adequate to discharge the pre-commencement conditions.

4.1.4.

A site visit was carried out on 29 June 2020, from public realm outside the protective fencing, which revealed that all of the site had been stripped of soil, including an area at the southern end of the application site, outside the housing allocation and close to the burn; with the exception of the end of the road, no physical development had been approved by 19/376/PP in the land subject to the current application for additional houses. Clearing this part of the site, and its use for storage of excavated materials, created an additional issue of potential runoff to the burn and, as then noted by Development and Marine Planning, the potential for salmonberry to spread in the vicinity of the burn. Salmonberry is a fast growing and invasive shrub which is present in the site. The failure to discharge the pre-commencement conditions resulted in the clearance of the site, movement of excavated materials and storage of materials being executed without planning control. In the context of seeking a voluntary halting of works, and within wider-ranging correspondence, the developer confirmed, "Works have commenced and I don't believe there is any reason for OIC to have any concern so great at this point as to demand that works should cease...".

4.1.5.

None of the four pre-commencement conditions were discharged, and in the absence of any further submission of details, a Breach of Condition Notice was served on the developer on 10 July 2020, in relation to condition 01 which was considered most urgent, given potential impact on residential amenity and natural heritage.

4.1.6.

A revised and more detailed Dust Management Action Plan and a revised Site Set-up Plan were submitted on 15 July 2020. In combination with the existing planning condition to control noise-generating activities, the dust control measures are considered suitable. The submitted Site Set-up Plan is acceptable, except for the proposed continued storage of excavated materials at the southern end of the site, where materials are currently piled, and the absence of measures to manage salmonberry. For that reason (only), the condition has not been discharged. The development remains in breach of pre-commencement condition 01.

4.1.7.

Pursuance of discharge of the condition is complicated by the fact the application currently under consideration is contained within the boundary of the original application site area, and the proposed development overlaps with the pile of excavated material at the southern end of the site. Therefore, if the current application is approved, the extent of information required to discharge condition 01 of 19/376/PP would be reduced, as the area approved for development would therefore include the materials already excavated and piled. However, if the application is refused, management of the land and the material stored within it, would remain under the control of the original condition. In order to maintain a reasonable and proportionate position, no further formal action following the Breach of Condition Notice has been pursued until the current application is decided.

4.1.8.

It remains that none of the pre-commencement conditions 01, 02, 03 or 04 have been discharged.

4.2. Millennium Woodland

4.2.1.

It was noted on the site visit on 29 June 2020 that works have been carried out within the Millennium Woodland to the south of the 19/376/PP application site, which is a Council-owned community woodland. The works are to install a pipe from the application site to the public sewer to the south. As the sewer for the whole development, the currently proposed houses, as well as those already approved, would connect to the pipe. The unauthorised works have resulted in approximately 23 semi-mature trees within the Millennium Woodland being lost or significantly damaged, as well as other habitat loss and damage.

4.2.2.

A retrospective planning application has now been submitted for the pipe, 20/288/PP, which will be subject to the normal planning process and potential for mitigation measures should approval of the pipe be considered appropriate.

4.2.3.

The pipe works are relevant to condition 03 of approval 19/376/PP, which is to agree details of a pedestrian footpath link to the Millennium Woodland; the retrospective application includes a footpath link to the west which would overlap with the shorter path link anticipated for the original application. The proper sequence of having details approved has been lost – approval subject to conditions, discharge of pre-commencement conditions and commencement in accordance with the agreed details. Pursuance of the original condition may now be delayed to allow the retrospective application to be determined.

4.2.4.

Impact on the Millennium Woodland is also relevant in relation to consideration of tree cover in the immediate vicinity, which also affects the application currently under consideration. As submitted, the landscaping plan for 19/376/PP shows no planting at the southern end of the site, and the developer has confirmed “residents in the Plots 7 and 8 most certainly will not want trees growing in front of their properties (defeats the purpose of the sites at this location)”. As is the case for management of excavated materials and the relevant condition, if the current development is approved, it would effectively remove the opportunity for tree planting that could otherwise be secured under condition 04 attached to 19/376/PP (it would be unreasonable to require trees to discharge an earlier condition, if a subsequent application was approved that deliberately included no trees).

5. Relevant Planning Policy and Guidance

The full text of the Orkney Local Development Plan 2017 and supplementary guidance can be read on the Council website at:

The policies listed below are relevant to this application:

- Orkney Local Development Plan 2017.
 - Policy 1 – Criteria for All Development.
 - Policy 2 – Design.
 - Policy 5A – Housing and Settlements.
 - Policy 9F – Trees and Woodland.
 - Policy 9G – Landscape.
 - Policy 10B – Open Space and Settlements.
 - Policy 13 – Flood Risk, SuDS and Waste Water Drainage.
 - Policy 14C – Road Network Infrastructure.
- Supplementary Guidance.
 - Settlement Statements.

6. Legal Aspects

6.1.

Section 25 of the Town and Country Planning (Scotland) Act 1997 as amended (the Act) states, “Where, in making any determination under the Planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise...to be made in accordance with that plan...”

6.2.

Where a decision to refuse an application is made, the applicant may appeal under section 47 of the Act. Scottish Ministers are empowered to make an award of expenses on appeal where one party's conduct is deemed to be unreasonable. Examples of such unreasonable conduct are given in Circular 6/1990 and include:

- Failing to give complete, precise and relevant reasons for refusal of an application.
- Reaching a decision without reasonable planning grounds for doing so.
- Not taking into account material considerations.
- Refusing an application because of local opposition, where that opposition is not founded upon valid planning grounds.

6.3.

An award of expenses may be substantial where an appeal is conducted either by way of written submissions or a local inquiry.

7. Assessment

7.1. Background and Proposal

7.1.1.

It is proposed to erect three houses on a site in the southern end of an area of formerly open ground adjacent to Cairston Road, Stromness, extending from the public road to the north, to the Mill Burn to the south, as shown in the location plan attached as Appendix 1 to this report. The site is bounded by existing houses to the east, by the Mill Burn and related semi-natural habitat to the south, and by tree and shrub planting comprising the Millennium Woodland along most of the west side of the site. Planning permission was granted in March 2020 for housing development in the remainder of the site, to the north, which is under construction. The application site is within the site boundary of the earlier application; no houses have been approved at the southern end of the development comprising the current site area, but the previous approval does include the end of the access road. Temporary security fencing has been erected around the outside boundary of the application site, as part of the fencing of the larger site.

7.1.2.

In addition to covering the approved housing to the north, the short-term housing allocation STR-6, as included in the Stromness section of Supplementary Guidance: Settlement Statements, makes up part of the planning application site. The southern part of the current application site is designated as Strategic Open Space and is outside the housing allocation, ie the application site extends beyond the housing allocation to include other land. A development brief was submitted with the previous application in the form of a Site Development Statement, and a Design Statement is provided with the current application. Supplementary Guidance notes the Mill Burn and provides a requirement for an appropriate buffer to the water course and consideration of flood risk (and other matters considered in relation to the approved application).

7.1.3. Amendments

The application has been subject to amendments since first submission. These amendments have principally been in response to comments received from Engineering Services regarding flood risk and finished floor levels.

7.1.4.

It should be noted that one house and two serviced plots were initially included in application 19/376/PP, occupying the plots that form the current application. These were removed before the previous application was decided. The report submitted to committee in March 2020 noted, "Following comments from the planning authority, one house and the two plots were removed from the proposed layout, resulting in the development now under consideration, and ensuring that all proposed development is located within housing allocation STR-6."

7.2. Principle

7.2.1.

Policy 5A – Housing and Settlements of the Orkney Local Development Plan 2017 confirms that the development of housing allocations will be supported where it accords with the relevant settlement statement and any adopted development brief. However, the layout proposed would result in built development outside the boundary of the housing allocation STR-6, and within land designated as Strategic Open Space. Specifically, plot 6 is entirely within the housing allocation, but much of the garden ground of plot 8, and much of the garden and part of the house of plot 7, are outside the housing allocation. In relation to Policy 5A, where outside the allocation, the principle would therefore rely on the development in part being regarded as redevelopment of derelict land. In addition, an “appropriate buffer around this water course that will remain free from development” would not be provided, as required by Supplementary Guidance: Settlement Statements, noting that garden ground is ‘development’. It would not be appropriate to forego the buffer as an essential corridor adjacent to the burn, and also define that same corridor of land as derelict for the purposes of justifying development beyond the allocation.

7.2.2.

The development must be assessed as submitted, and it is not appropriate to suggest alternative detailed layouts at this stage. However, given that the principle is assessed, in part, in relation to the boundary of the land allocated for housing development, it is fair to reach a conclusion that the principle would have been considered differently had the density been less and/or one less unit proposed, and critically the development being contained within STR-6. Considering the development as submitted in its entirety, the failure to provide an appropriate buffer around the watercourse, and the number of units and resultant encroachment of garden ground and built form beyond the housing allocation, are such that the development is considered contrary to Policy 5A of the Orkney Local Development Plan 2017, and Supplementary Guidance: Settlement Statements.

7.3. Design and Appearance

7.3.1.

Two of the proposed houses are laid out at the angle of the access road, and one perpendicular to those already approved, as indicated in the site plan attached as Appendix 2 to this report. It is unfortunate that the orientation of the approved development would not be repeated, with houses there aligned with a general building line and frontages facing into the street. It is accepted that would require realignment of the end of the access road. The orientations result in the clothes drying line and bin storage for Plot 6 facing into the street, rather than in a private back garden as is the case with the other houses. The developer confirmed the application was to be determined as submitted.

7.3.2.

All units would be single storey and generally simple in form. The palette of materials proposed is a simple mix of white/off-white render with dark tiled roofs with matching

facias and soffits, and grey windows and doors. This would match the remainder of the development.

7.3.3.

No details of landscaping have been submitted, and it is considered appropriate for any development to include tree planting along the edge of the burn. The omission of proposed trees, and the consequence, if approved, that no trees would be planted, must be taken in context with other factors:

- Landscaping details provided in pursuance of discharge of condition 04 attached to 19/376/PP included no trees in the current application site area. That pre-commencement condition has not been discharged.
- No development-free buffer would be provided along the burn.
- The applicant has stated the occupants of Plots 7 and 8 would not want trees as it would affect the view from those houses.
- Forgoing trees along the burn edge which would have linked the existing tree cover to the east, with the Millennium Woodland to the west, is forgoing an opportunity for a green corridor along the burn.

7.3.4.

In relation to Policy 1, part (i), the development is considered to take into consideration the location and wider townscape character. Policy 2 requires that development must reinforce the distinctive identity of Orkney's built environment and be sympathetic to the character of the local area and have a positive or neutral effect on the appearance of the area. In relation to the scale, form, massing, proportions and materials, the application is considered to accord with Policy 2 of the Orkney Local Development Plan 2017. The orientation of the houses would be out-of-keeping with the adjacent approved layout, and the lack of landscaping at the southern edge is a concern, and as a result, accordance with Policies 1 and 2 remains in balance. In a wider landscape context, the development would protect the overall integrity of the Hoy and West Mainland National Scenic Area and have no adverse impact on its special qualities, in accordance with Policy 9G – Landscape of the Orkney Local Development Plan 2017.

7.4. Residential Amenity

The alignment and footprint of the proposed houses would ensure that none of the proposed windows would directly face or be within 21 metres of any windows of any existing or approved neighbouring properties. The proposed houses are an adequate distance from neighbouring houses that there would be no unacceptable impact in relation to sunlight or daylight. The application is considered to comply with Policies 1(iv) and 2(ii) of the Orkney Local Development Plan 2017, by ensuring that the amenity of the surrounding area would be preserved with no unacceptable adverse impacts on adjacent and nearby properties, and by ensuring a positive or neutral effect on the amenity of the area.

7.5. Parking and Road Safety

Roads Services was consulted and has no objections, on the basis the plots would be accessed from the road already approved. The application is therefore considered to comply with Policy 14C – Road Network Infrastructure of the Orkney Local Development Plan 2017.

7.6. Flood Risk

Engineering Services requested information regarding floor levels. All properties would be above the required minimum finished floor level of 5.02 metres above ordnance datum. The application is therefore considered to comply with Policy 13A – Flood Risk of the Orkney Local Development Plan 2017.

7.7. Natural Heritage

7.7.1.

It is difficult for natural heritage to be considered in isolation, as concerns principally hinge on the lack of an appropriate buffer to the watercourse, as required by Supplementary Guidance: Settlement Statements, and which is as a result of the extent of development proposed including that outside the STR-6 allocation.

7.7.2.

The edges of the burn are identified in the Orkney Local Biodiversity Action Plan as a locally important habitat for conservation. The part of the burn passing the application site follows a naturally meandering route and the low-lying areas on either side support tall bankside vegetation in places. Maintenance and enhancement of this habitat would be the objective of the development-free buffer as included in the Settlement Statement for STR-6. However, if provided as habitat and not garden ground as shown, there would be inadequate space for the houses and associated garden ground; this is a key conflict of the proposed development, and the balance between the natural heritage requirements in accordance with Supplementary Guidance, or the provision of an additional house.

7.7.3.

Sea Trout are present in the Mill Burn. These are a Priority Marine Feature and are vulnerable to water-borne pollution and habitat degradation. An appropriately sized development free buffer would help prevent damage to the aquatic and bankside habitats of the burn. Otters are likely to be active in the area, alternating between the marine environment and the burn. It would be recommended that a survey be undertaken if development, including grading ground levels and creating garden ground, was to proceed in the buffer zone of the burn.

8. Conclusion

The housing would form the southern edge of an existing approved development, and it was expected that housing would be proposed. However, following the three plots being omitted from the previous application approved in March 2020, the opportunity was not taken to remove one unit or alter the arrangement to limit the

development to within the housing allocation STR-6. The development is acceptable on servicing and technical grounds, Roads Services has no objections, and finished floor levels would be set to meet the requirements of Engineering Services. The orientation of the houses fails to follow the remainder of the development. The extent of the development outside land allocated for housing, density and orientation, and critically the lack of a development-free buffer laid to natural vegetation alongside the water course, leads to the conclusion that the development is contrary to Policies 1, 2, 5A and 10B of the Orkney Local Development Plan 2017, and Supplementary Guidance: Settlement Statements. Accordingly, the application is **recommended for refusal**.

9. Reason for Refusal

01. The development is only in part located within land allocated for housing development, STR-6, in accordance with Policy 5A, with the remainder in designated Strategic Open Space, including both garden ground and built form. No compensatory provision is provided for the loss of part of this Strategic Open Space. Critically, Supplementary Guidance: Settlement Statements requires an appropriate buffer around the water course, free from development, which is not provided. Development and Marine Planning has provided advice on the habitats and species that would be safeguarded by provision of the buffer. As submitted, the site layout would not allow for an appropriate buffer, with one plot relying on land close to the burn to create adequate garden ground, and it has been confirmed that the occupants of the two closest plots would not wish for tree planting adjacent. Therefore, determining the application as submitted, it is considered contrary to Policies 1, 2 5A and 10B of the Orkney Local Development Plan 2017, and Supplementary Guidance: Settlement Statements.

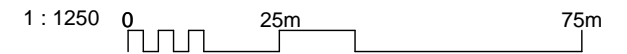
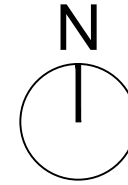
10. Contact Officer

Jamie Macvie, Planning Manager, Development Management, Email jamie.macvie@orkney.gov.uk

11. Appendices

Appendix 1: Location Plan.

Appendix 2: Site Plan.



REV	DATE	DESCRIPTION	DRN
B	26.11.19	RED LINE BOUNDARY REVISED	KM

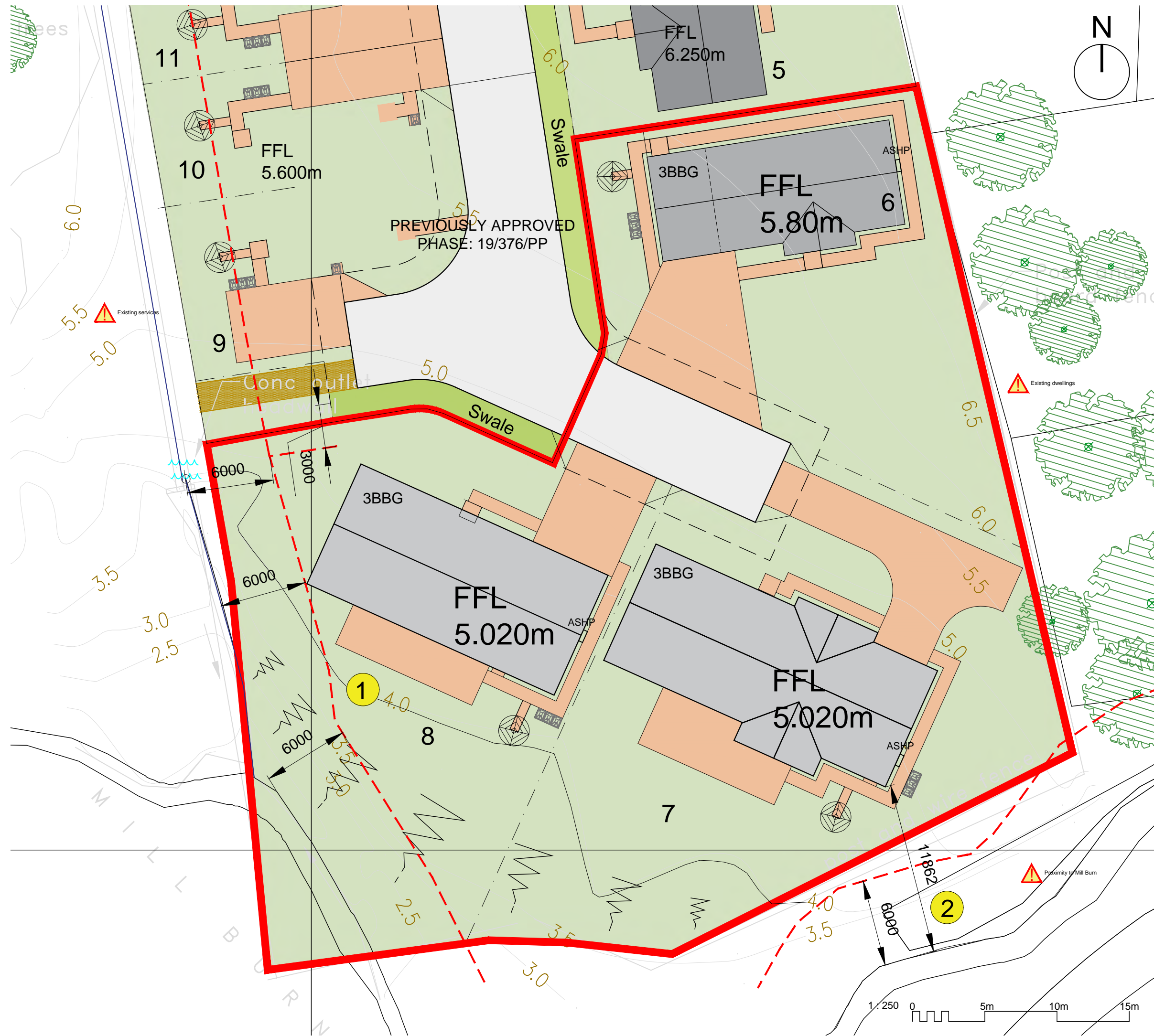
Bracewell Stirling CONSULTING

38 WALKER TERRACE, TILlicOLTRY, FK13 6EF 01259 750301
 5 NESS BANK, INVERNESS, IV2 4SF 01463 233760
 15 LOCHSIDE STREET, OBAN, PA34 4HP 01631 359054

**HOUSING AT CAIRSTON ROAD
 STROMNESS
 ORKNEY BUILDERS LTD**


LOCATION PLAN - PHASE 2

SCALE:	1 : 1250	DRAWN:	--
PAPER SIZE:	A3	DATE:	Jun 2020
DWG No.	4458-01-002	REV.	-






Note to Designers and Contractors

Under the CDM2015 regulations BSC has sought to eliminate or reduce risks where possible as part of the design process.

Significant residual risks, or areas of work that require special attention during construction, which have been identified by BSC, are indicated on project drawings by the following symbol .

It is anticipated that other designers and contractors will co-operate to identify any potential construction hazards and to eliminate them where possible.

Measures to minimise residual hazards will be reviewed on a regular basis.

-  +3.97M AOD 1 IN 200 YEAR CONJECTURED MAX COASTAL INUNDATION LEVEL, THAT INCLUDES ALLOWANCE FOR WAVE ACTION
-  OFFSET FROM MILL BURN CONSISTENT WITH ADJACENT HOUSING AND SCHOOL BUILDING
-  6m OFFSET FROM WATERCOURSE

SITE AREA: 0.24ha

REV	DATE	DESCRIPTION	DRN
C	05.08.20	FFL OF PLOTS 7 & 8 REVISED TO TAKE COGNISANCE OF COMMENTS FROM SEPA/FLOOD TEAM	KM
B	08.07.20	6m OFFSET FROM WATERCOURSE NOTED. PLOT 7 & 8 POSITIONS REVISED ACCORDINGLY	KM
A	29.06.20	ASHP LOCATIONS INDICATED ON SITE LAYOUT	KM

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38 WALKER TERRACE, TILlicOUNTRY, FK13 6EF 01259 750301
 5 NESS BANK, INVERNESS, IV2 4SF 01463 233760
 15 LOCHSIDE STREET, OLAN, PA34 4HP 01631 359054

HOUSING AT CAIRSTON ROAD
 STROMNESS
 ORKNEY BUILDERS LTD

SITE LAYOUT - PHASE 2

STATUS:	PLANNING
SCALE:	1 : 250
PAPER SIZE:	A3
DWG No.	4458-01-051
REV.	C

