#### F/YR15/1002/F

Applicant: Mr E Smith Agent: Mr H Chapman

**Peter Humphrey Associates Ltd** 

Land South Of Rosemary Cottage, New Road, Manea, Cambridgeshire

Change of use of land to a travellers site involving the siting of 3 x chalet homes and retrospective permission for a shed, day room and stables.

### **Reason for Committee**

The application is before Committee at the request of Cllr Mark Buckton because of the site's history. The Council also received a number of letters of representation about the application. Many were in support (42) and some were against (5) the proposal.

#### 1 EXECUTIVE SUMMARY

This proposal seeks planning permission for a traveller's site with 3 x chalet style homes and retrospective permission for a large shed, stables and a day room. The site would accommodate Mr Eli Smith and his extended family (two children and grandchildren).

The personal information of the family and their status is not disputed by the LPA and this is afforded significant weight.

Permission for use of the land as a traveller's site has been refused on two previous occasions. The first refusal was also upheld at appeal. In both cases the main issue was flood risk because the site is within Flood Zone 3 which remains an important constraint to this type of development in this location.

The applicant's flood risk consultant has submitted information stating that:

- The site is actually located in a defended Flood Zone 3 on the EA's Flood Zone Maps;
- The Middle Level Barrier Bank offers protection of up to 1 in 1000 year flood event. Notwithstanding this, works are proposed to raise and strengthen it over a 4 year period ending March 2021;
- That this changes the status of the site to Flood Zone 1, therefore there is no need to undertake a sequential of exception test as required if the site was in Flood Zone 3; and
- Floor levels will also be raised 500mm above existing ground level and securely anchored to concrete foundations

The EA however, object on the grounds on flood risk grounds (to be updated).

Fenland's Gypsy and Traveller Accommodation Needs Assessment Update 2013 (GTANA) was recently tested at two appeals. In allowing the appeals, two Planning Inspectors concluded that there is a potential unmet need for sites within the District. However, Officers have reviewed the Inspectors comments and disagree with their findings. The GTANA identifies that 13 new G&T pitches will be required between the period 2013 to 2021 (in effect the Council's target for a 5 year land supply for G&Ts), and, according to the Officer's assessment, 16 pitches are available.

Weight must be given to the availability/lack of suitable sites within the area but irrespective of whether a need is identified or not, Policy LP5 (meeting housing need) Part D states that the Council will determine applications on a case by case basis.

Other aspects of the scheme are found to be, on balance, acceptable, and the LPA must take into consideration the unmet need. However, at this time the EA do not accept that the site is suitable for the proposed use and the LPA must be satisfied with regard to the safety of people, their ability to reach places of safety and safe refuge and the ability of emergency services to access such buildings to rescue and evacuate those people. In this instance Officers have no alternative but to recommend refusal to Members.

#### 2 SITE DESCRIPTION AND PROPOSAL

The site lies outside the village of Manea but adjacent to a group of properties (known as Toll Drove or The Toll) located off a C Class Road. The site and surrounding area lies within Flood Zone 3, a Flood Warning Area and an area benefitting from flood defences.

This proposal seeks planning permission for a traveller's site with 3 x chalet style homes and retrospective permission for a large shed, stables and a day room. The site would accommodate Mr Eli Smith and his extended family (two children and grandchildren).

The stable block, day room and shed (used as a hay store) have been in situ for some time but the day room has yet to be fitted out internally. Aerial photos from 2007 show the stable block, shed and footings for the day room. Between 2007 and 2011 the site was extended at the rear and now includes additional land. This application also proposes to locate one of the chalets on paddock land to the north. Three mobile homes are currently on the site and will be replaced by the chalets. Each chalet pitch measures 10m x 8m. An indicative photograph of a chalet is included in the Design and Access Statement.

The nearest residential property is to the north, Rosemary Cottage. One of the occupants suffers from a serious health condition. This property is a replacement dwelling approved in August 2012.

At the time the application was submitted there was already a historic use of the site (although unauthorised) as detailed in the Site History below. On the ground the distribution of caravans and buildings did not accord with the details on the original submitted drawings. This has been corrected and the latest Site Plan and Location Plan show the detail of the site and proposal, part of which is retrospective.

## Personal Details

The applicant, Mr Smith, was born into the travelling society. He travelled throughout his childhood; he continued to travel with his wife and his family. They have lived in Newark, Stafford, Cornwall, Featherstone, County Durham and Peterborough before settling down in Spalding in 2008 as his family grew and he wanted to keep them together. His family has continued to grow with his children now having families of their own. Mr Smith has 3 children, 2 boys and a girl.

Mr Smith has relocated from the site in Spalding as his family now require 3 units, he also owns horses which he was paying to keep elsewhere and the proposed site has a paddock and stables for these. He has relocated his family to provide

them with more space for his grandchildren to grow up allowing for a more peaceful quiet life. One of his grandchildren attends the local school. His son-in-law is undergoing continuous treatment at Addenbrookes hospital.

The proposal will allow the family to live together and for the men to travel as required. Family photographs are included within the Design and Access Statement.

Full plans and associated documents for this application are available at:

https://www.fenland.gov.uk/publicaccess/applicationDetails.do?activeTab=documents&keyVal=NWKJ1EHE06P00

# 3 SITE PLANNING HISTORY

**F/YR11/0091/F**- Change of use of land for residential use involving the siting of 3 no. touring caravans, 1 mobile home and erection of a day room, store and stables (retrospective). Refused June 2011.

An appeal was dismissed in March 2012, flood risk being the decisive factor. The FRA did not show that the risk to the occupiers could be satisfactorily mitigated in the event of a breach or overtopping of the flood defences. (The proposal included the construction of a 1.6m high earth bund around the site to reduce residual flood risk in the event of a breach of or overtopping of flood defences).

**F/YR12/0499/F** - The siting of 1 x mobile home and 3 x touring caravans, erection of a day room, barn and stables, construction of an earth bund (2m high and 5.2m wide) and change of use of land to equestrian paddock (retrospective). Refused August 2012. Reasons for refusal: flood risk; the bunding would be visually intrusive; and there is no "need" for pitches within Fenland.

# **Enforcement Action**

The two applications above were submitted following the serving of an enforcement notice on 1 July 2010 (ENF/050/10/UW) for the unauthorised change of use of the land for residential use and required the removal of the mobile home and caravans. F/YR11/0091/F was refused and as set out above the appeal was dismissed. The subsequent application was also refused F/YR12/0499/F. The site was vacated and the enforcement breach on site ceased and no further action was required. In 2013, the site was occupied again. A new enforcement file was opened (ENF/011/13/UCU). The site was vacated and no further action was required. The file was closed.

In 2014 a new enforcement file was opened with regard to the latest occupier, the applicant. (ENF/104/14/UW). The application before Committee has come about as a result of this enforcement action.

# 4 CONSULTATIONS

#### **Manea Parish Council**

Supports the proposal but requests a personal permission.

# **CCC Highways**

The application site is detached from the village of Manea located approximately 1km from the edge of the settlement. With no pedestrian infrastructure connecting the application site with Manea then occupants of the site are likely to be purely dependant on the private motor vehicle. FDC when determining this application should consider the sustainability credentials of the site for the proposed use and

whether this complies with local and national policy. In light of the current site use and the previous applications that have been determined for this site the highways department is unable to substantiate a highways reason for refusal, therefore no highways objections.

# **Environment Agency(EA)**

Object to the application. The site is within Flood Zone 3. The proposed development falls into a flood risk vulnerability category that is inappropriate to Flood Zone 3.

# Traveller and Diversity Manager (Mr David Bailey FDC)

Mr Smith will use his plot as a base to continue travelling from to find work. His wife and 16 year old son will live on the site. Mrs Smith suffers from both anxiety and depression. Mr Smith's eldest son is getting married next year. The new plot to be established will be the home for his son and daughter in law. Again a base for his son to return to as he travels to find work on a regular basis.

Mr Smith's daughter also lives on the site with her husband. They have 2 children, one new born and another who is aged 8 and goes to the local school. Mr Smith's son-in-law has had a head operation at Addenbrookes and has to attend on a regular basis for check-ups. He also travels to find work.

From this and other information given it is concluded that Mr Smith and his family are Gypsies.

## **Middle Level Commissioners**

Nothing received

#### **Local Residents/Interested Parties**

5 objectors and 42 supporters have written in.

# **Objectors concerns:**

Loss of agricultural land;

Busy road with dangerous blind bend;

No street lighting or pavements or access to public transport;

Unsightliness of the development, unsympathetic to the character of the area;

Previous refusals should be upheld;

Noise pollution caused by pets;

Site is not suitable for this type of development due to flood risk and is contrary to Technical Guidance to the NPPF;

Increase the flood risk to other areas because of the amount of hardstanding;

Soakaway is not appropriate method of drainage:

Road safety/ limited visibility/ substandard highways infrastructure;

There is no need for additional pitches according to GATNA Update 2013, and January 2016 update which states there are 3 pitches available;

Will set a precedent for the approval of traveller sites in flood risk areas across the country;

The development does not respect the interests of the settled community including the personal circumstances of neighbours including health concerns which require tranquillity with areas for meditation provided within the adjacent garden;

The noise and disturbance caused by the development is upsetting to an adjacent resident who suffers from a serious health condition;

The fence for the proposal obstructs the highway verge;

The scale of the development (3 families) will dominate the settled community;

The adjacent fields are submerged in water during periods of heavy rainfall;

Other plots are available elsewhere;

Inaccurate plans with regard to Rosemary Cottage, overlooking;

Outside the Development Area Boundary and other conflicts with Fenland Local Plan 1993:

Contrary to PPS1 and PPS7;

Noise from the site has disturbed the business operating from the adjacent property;

Dispute the claim that it has been used as an unofficial traveller's site since 2006; Sequential and Exception Tests are not fit for purpose, chalets are still classed as mobile homes:

Engineering and sewerage works have been undertaken and should be included; No details of design of the chalets or driveway to Chalet 3;

The applicants have not integrated themselves into the local community;

Chalets mean the day room is unnecessary;

If permission is granted, the following conditions should be set:

- 1.No more than one family to reside on the site, ideally in a 2 storey brick building, or failing that a maximum of 3 non-mobile chalets that meet flood risk guidelines to support that family;
- 2.No Touring Caravans to be allowed on the site;
- 3. No business activities to be conducted from the site, and
- 4. No vehicles over 3.5 tons to be stored on the site.

# Supporter's comments

The comments were submitted on the same pre-typed letter all from residents of Manea (except 2), supporting the application and stating that the site has been used by a number of families over the years and at no times have they been any trouble to the village. Additional comments include: pleased with the work on my garden; they give magnificent support to the village;

# 5 POLICY FRAMEWORK

National Planning Policy Framework (NPPF) (2012) Planning Policy for Traveller Sites (PPTS) (2012) Planning Practice Guidance (PPG) (online) (2014) Fenland Local Plan (2014)

LP1: Presumption in favour of sustainable development.

LP2: Health and Wellbeing

LP3: Spatial Strategy, the Settlement Hierarchy and the Countryside

LP5: Meeting Housing Need – Part D Gypsy and Travellers and Travelling Showpeople.

LP12: Rural Areas Development Policy

LP14: Responding to Climate Change and Managing the Risk of Flooding in Fenland

LP15: Facilitating the Creation of a More Sustainable Transport Network in Fenland

LP16: Delivering and Protecting High Quality Environments across the District

LP19: The Natural Environment

## 6 KEY ISSUES

- Principle of Development
- Flood risk
- Character and Appearance
- Sustainability
- Peaceful and Integrated co-existence
- Neighbour Amenity

#### 7 ASSESSMENT

# **Principle of Development**

The site is located within the open countryside although adjacent to a small hamlet. Part D of Local Plan Policy LP5 sets out a criteria (a - f) which will be used to assess new sites and associated facilities. The Council will be prepared to grant permission for sites in the countryside provided that there is evidence of a <u>need</u>, that the intended occupants <u>meet the definition of Gypsy and Travellers</u>, and provided that the <u>LP5 Part D criteria</u> (a - f) are met.

Two recent appeal decisions (February 2016 F/YR14/0846/F Ponderosa Farm Garden Lane Wisbech; and May 2016 F/YR14/0854/F The Spinney, Horsemoor Road, Wimblington) concluded that the Council does not have a 5-year supply of gypsy and traveller sites. This is a material consideration which should weigh in favour of the development, subject to any other constraints. Furthermore, where need is identified then other impacts may have to be tolerated.

The GTANA identifies that 13 new G&T pitches will be required between the period 2013 to 2021 (in effect our target for a 5 year land supply for G&Ts)

In terms of what should be counted towards meeting the 13, The Spinney Inspector advised that the 10 pitches at Oakdale Place could not reasonably count towards this as these relied on eviction of current occupiers to make them available and therefore "casts a degree of doubt on whether these are truly available." Enforcement action on Oakdale Place is currently being considered to free up these pitches for G&Ts, but cannot be counted at present.

In assessing what should contribute towards meeting the need a revised assessment has been carried out and considers:

- Those pitches that have been granted planning permission prior to 2013 but are currently vacant/unimplemented.
- Permanent planning permissions granted since 2013. This includes personal
  permissions where these relate to dependents of the applicant as these are
  clearly contributing towards meeting the need for G&Ts.

Of those granted prior to 2013 but are currently vacant/unimplemented these amount to 6: Bar Drove (1), Bevis Lane (3), and two local authority pitches: Sandbank (1) and Fenland Way (1).

Of permanent planning permissions since 2013 these amount to 10: Old Dairy Yard, Manea (3), North Brink, Wisbech (2), Ponderosa Farm (1), The Spinney (4).

Combining the two figures produces a total of 16 pitches.

The single pitch at Willow Place is not included in this assessment (due to The Spinney Inspector casting some doubt of its inclusion as it is conditioned to a single occupier only) but it benefits from a 20 year old planning permission and the use of the land is well established for G&T use. The chances of planning permission being granted on this site is therefore high.

Given that FDC's target is 13 new pitches and our availability/provision of pitches amounts to 16, it is considered that there is currently no need for new G&T pitches in Fenland at present.

The Traveller and Diversity Manager is satisfied that the applicant has Gypsy status

The Fenland Local Plan indicates that irrespective of whether an up-to-date need is identified or not, the Council will still determine applications on a case-by-case basis. Policy LP5 is the key consideration in the determination of the application.

# Flood Risk (criteria (a) of Policy LP5, Part D refers)

The NPPF requires LPAs to steer new development to areas at the lowest probability of flooding. The site lies within Flood Zone 3 and the proposed development is classed as 'highly vulnerable' – table 3 of the PPG to the NPPF states this type of development is not compatible with Flood Zone 3 and should not therefore be permitted.

A Flood Risk Assessment (FRA), and further information relating to a Sequential Test were submitted with the application. The applicant's Consultant also wrote directly to the EA. In response the EA acknowledge that the site is shown to be located within a defended Flood Zone 3 on the EA's Flood Map for Planning. However, they also go on to remark that there is still a residual risk of flooding at the site in the event of a breach or overtopping of the Middle Level Barrier Bank flood defences.

The NPPF does not differentiate between defended and undefended Flood Zone 3 in the application of the Sequential Test. In accordance with Table 1 of the Planning Practice Guidance to the NPPF, this site falls within Flood Zone 3a. The proposed development (i.e. mobile homes intended for permanent residential use) is classified as 'highly vulnerable', in accordance with table 2 of the Planning Practice Guidance and as such the EA maintain their objection to the application. In accordance with Part B of Policy LP14 of the Fenland Local Plan, development should only be permitted in areas known to be at risk of flooding following the successful completion of a Sequential Test, having regard to actual and residual flood risks. The Planning Practice Guidance to the NPPF advises that it is for the local planning authority to determine whether the Sequential Test has been passed, taking advice from the EA.

The applicant's Sequential Test states that because FDC has not prepared a Level 2 Strategic Flood Risk Assessment for the whole district they are unable to undertake the Sequential Test as per the NPPF Planning Policy Guidance using the Environment Agency Flood Zone Maps.

It goes on to say, the site is located within a defended Flood Zone 3 as protected by the Middle Level Barrier Bank. The current Standard of Protection (SoP) for the Middle Level Barrier Bank is approximately 1 in 200 years although it is 1 in 100 years in two isolated locations at low spots in the bank. There are plans to undertake work on the bank over a 4 year period ending 31<sup>st</sup> March 2021 to provide a minimum SoP of 1 in 1000 years as required under the Reservoirs Act 1975. The site is also located in the Curf and Wimblington IDB area and is protected from flooding to a minimum SoP of 1 in 50 years. This identifies the present status of the site as Flood Zone 2; land assessed as having between 1 in 100 and 1 in 1000 year probability of flooding. The residual risk from any breaching or overtopping of the Middle Level Barrier Bank will be minimised by the proposed strengthening works which have to be completed by 31<sup>st</sup> March 2021 to meet the legal requirements of the Reservoirs Act 1975. This would then identify the site as located in Flood Zone 1; land assessed as having less than 1 in 1000 year

probability of flooding. As a result the site should properly be identified in Flood Zone 1 as protected to the minimum SoP of 1 in 1000 years. If so the Sequential Test is met.

The EA disagree with the statement which states that it is not possible to carry out the Sequential Test using the flood zones shown on their Flood Map for Planning. In the absence of a Level 2 Strategic Flood Risk Assessment (SFRA), either a Level 1 SFRA or our Flood Map for Planning should be used to apply the Sequential Test (whichever is the most up-to-date). They also disagree with the statement that the site should be properly identified as being in Flood Zone 1. As there is a residual risk of flooding at the site from the Ouse Washes, as well as watercourses under the jurisdiction of the Internal Drainage Board, the site is located within Flood Zone 3. The EA has no plans to update their Flood Map in the near future and it is for the LPA to determine whether the proposed development passes the Sequential Test.

The site specific FRA and subsequent information provides for mitigation that the proposal would be safe from flooding for the lifetime of the development. Additional assurance and safeguards could be provided by the production of a Flood Plan for the evacuation of the site which could be requested by condition.

Notwithstanding this, the EA has maintained its objection. However, the LPA awaits an update from them on this matter.

The objectors comments about setting a precedent for other traveller site permissions to be allowed in Flood Zone 3 are noted. The LPA must deal with each application on its own merits and on a site by site basis.

It should also be noted that with Flood Zone 3 the Exception Test is only necessary when considering proposals for "essential infrastructure or "more vulnerable" development which does not apply to this proposal.

#### Character and Appearance (criteria a of Policy LP5, Part D refers)

As indicated in the site description the site is located in an open countryside location within the flat fenland landscape. Given that the site is adjacent to small hamlet of properties and farming enterprises, it relates more to the hamlet than the open countryside. Any distance views of the development should be taken in context with the adjacent built form. The objector's comments are noted. The stables and barn are characteristic of the open countryside and do not cause harm to the character of the area.

The PPTS states that when considering applications local planning authorities should attach weight to the following matters; sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness; and not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

Given its immediate surroundings the existing buildings sit comfortably within the landscape. However, the additional chalets and boundary fences do introduce rather stark features but any harm to the character and appearance of the area could adequately be mitigated with soft landscaping such that the chalets could be successfully integrated into the landscape. With appropriate soft landscaping, which could be required by condition, the development would not be unduly harmful to the character and appearance of the area and would not be contrary to

Fenland Local Plan Policies LP12, which relates to development in rural areas, or LP5, which relates to gypsy and traveller sites.

# Sustainability of the site's location and highway safety (criteria b and d of Policy LP5, Part D refers)

The PPTS states, at paragraph 13, LPAs should ensure that traveller sites are sustainable economically, socially and environmentally. Sub-paragraph h) of paragraph 13 states that LPAs should ensure that policies reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Policy C of PPTS, in stating that when assessing the suitability of sites in rural or semi-rural settings, LPAs should ensure that the scale of such sites does not dominate the nearest settled community, recognises that sites outside settlements are not unacceptable in principle. There is nothing within either the NPPF or PPTS to suggest that traveller sites have to be accessible by means other than by private car. Both recognise that the lifestyle of travellers must be factored into the planning balance. Again the comments of the objectors are noted, but any weight to be attached to the location of the site, the lack of street lighting or pavements is, therefore, reduced and the site is considered to be sustainable in terms of PPTS.

The majority of the neighbouring properties are located within large curtilages with outbuildings. It is considered that the proposal for 3 x chalets would not dominate the nearest settled community, which the objectors state to be the neighbouring hamlet, in terms of scale or cause significant harm in terms of additional personnel or built form.

Peaceful and integrated coexistence (criteria c of Policy LP5, Part D refers) Sustainability goes beyond just the matter of location, it also encompasses the wider social, environmental and economic roles identified in the NPPF. In this case, 40 letters of support have been received from residents of Manea. This is an indication that the applicant has integrated with the community. It is hoped that, despite their objections, should the application be approved, this would continue and include the immediate neighbours.

## **Neighbour Amenity**

Policy LP2 and LP16 (e) seek to ensure that development does not adversely affect the amenity of neighbouring users. The comments of the neighbours are noted. The LPA acknowledge the personal circumstances and ill health of the occupier of the neighbouring property which is located approximately 45m from Chalet 3 which has been considered carefully in the determination of the application. This is much greater than the average distance between residential properties. The use of the proposal site for residential purposes only and not for business use can be conditioned. Any noise disturbance over and above that ancillary to the normal use of a residential property would fall under the jurisdiction of the Environmental Health Department. With these controls in place, it is considered unlikely that neighbouring residents will suffer from a reduction in reasonable and appropriate standards of residential amenity, as a result of the proposal. With regard to overlooking, the chalets are single storey. With appropriate new and enhanced landscaping, it is considered that overlooking would not be significantly detrimental to amenity. The LPA cannot prevent reasonable and appropriate development on an adjacent site because of the personal circumstances of an individual if all other matters and policies are complied with. In this instance the proposal is considered to comply with LP2 and LP16 (e).

#### Other

Policy LP5 Part D criterion (f) requires gypsy and traveller sites to be served by, or be capable of being served by, appropriate water, waste water and refuse facilities. Some the objectors consider that it has not been demonstrated that an acceptable scheme for foul drainage can be provided, this is an appropriate matter for inclusion in a suitable condition.

New Road is a C classified highway. The objectors comments are noted but the development is unlikely to generate a significant amount of additional traffic onto this classified road. No objections have been received from CCC Highways, including to any encroachment onto highway land, and therefore no concerns are raised in respect of Policy LP15 of the Fenland Local Plan 2014.

## 8 CONCLUSIONS

The LPA has sympathy with the desire of the applicant to provide opportunity for the extended family to reside on this site, and significant weight is attached to this in its evaluation of the scheme. It is also apparent that in scale, design and amenity terms there are no significant impacts accruing from the proposed development subject to appropriate conditions.

However, FDC is maintaining its position with regard to need, namely that there is no unmet need in Fenland.

Notwithstanding these aspects it is clear the NPPF, NPPG and Local Plan are framed in such a way that safety from flood risk should ultimately be a key determinant on whether such development is acceptable. As the site is within Flood Zone 3 and with the EA maintaining an objection it is contrary to this requirement and as such the LPA has no alternative but to refuse the proposal on flood risk grounds.

## 9 RECOMMENDATION

- 1. Policy LP14 of the Fenland Local Plan (2014) and the National Planning Policy Framework seeks to direct development to areas of lowest flood risk to ensure the safety of people and property this being further reinforced by Policies LP2, LP12, LP14 and LP16 of the Fenland Local Plan( 2014). The proposal would result in highly vulnerable development being located within Flood Zone 3, the area of highest flood risk thereby putting people and property in danger of identified risks to the detriment of their safety and as such it would be contrary to Policies LP2, LP12, LP14, LP15 (a) and LP16 and the clear guidance contained within the National Planning Policy Framework.
- 2. The proposal does not accord with the requirements of Fenland's Gypsy and Traveller Accommodation Needs Assessment Update 2013 (GTANA) which identifies that 13 new G&T pitches will be required between the period 2013 to 2021 and, according to the Officer's assessment, 16 pitches are available.

Case Officer	Team Leader
Date:	Date:



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F/YR15/1002/F

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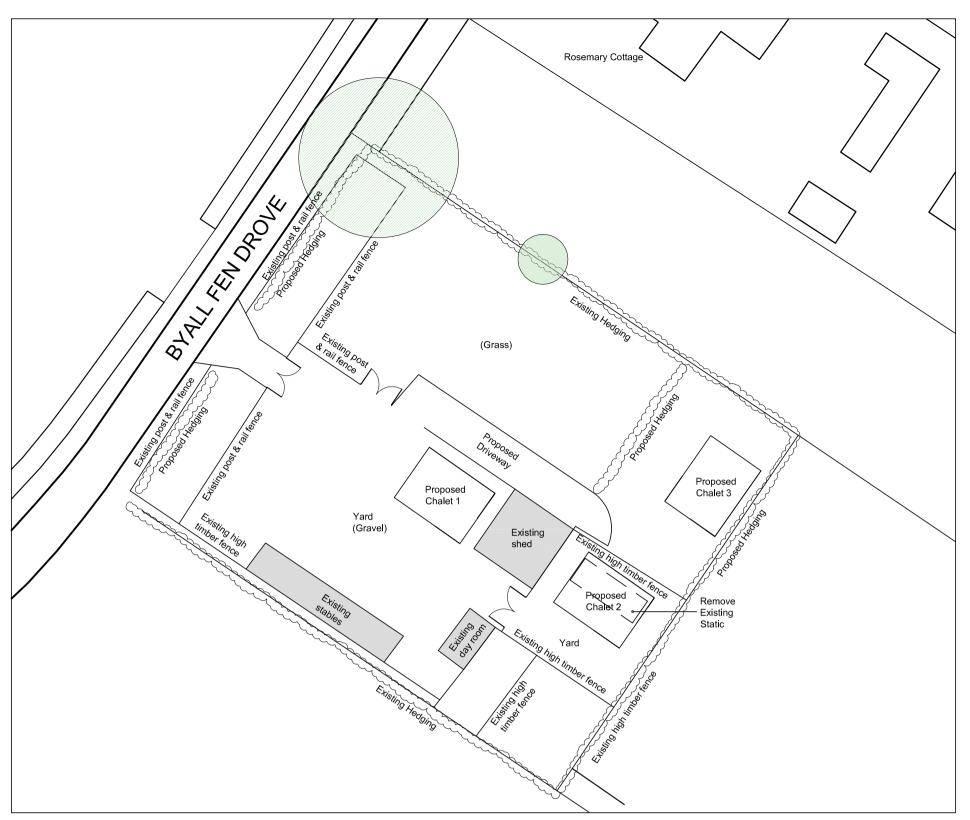
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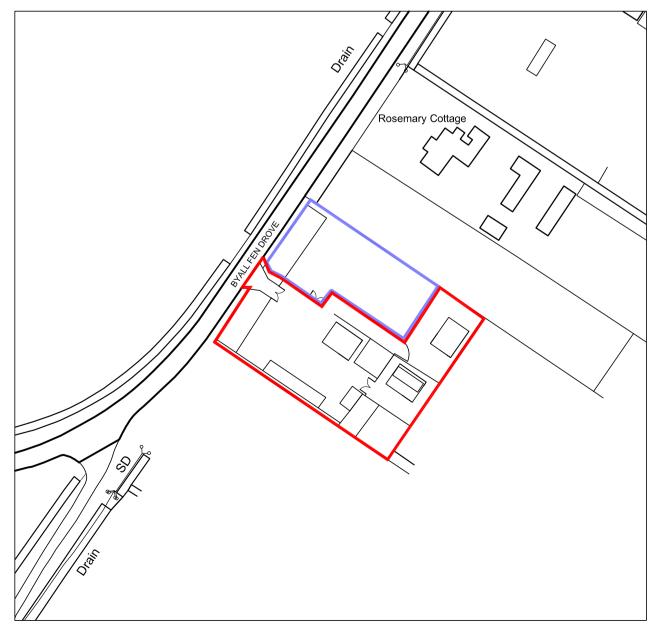
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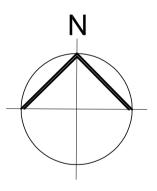
Fenland

CAMBRIDGES HIRE
Fenland District Council



SITE PLAN 1:500







PROJECT

3 New Chalets Land South of Rosemary Cottage Byall Fen Drove Manea

CLIENT Mr Eli Smith

DRAWING TITLE

PROPOSED SITE PLAN

DATE OCT 15

SCALE AS SHOWN JOB No. 5324-PL01H

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**LOCATION PLAN 1:1250**