

# Horsham District Local Plan 2023-2040 Examination

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**Our ref** 61647/02/MS/HBe  
**Date** 21 November 2024  
**From** Lichfields obo Berkeley Strategic Land Limited

## Subject Matter 9: Sites Allocated for Development in the Plan

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This Hearing Statement has been submitted by Berkeley Strategic Land Limited ('Berkeley'); promoting the 'Land North West of Southwater' (HA3) 'Strategic Site' for around 1,000 homes.

Appendix 1 to Berkeley's Matter 1 statement sets out a Table of Modifications as proposed within Berkeley's submitted Hearing Statements (Matters 1 to 10).

### 1.0 Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

#### Q1. Is Strategic Policy HA1: Strategic Site Development Principles sound?

- 1.1 No. **Berkeley objects** on the basis that the policy is not justified or effective (NPPF paragraph 35b & 35c). However, modifications can resolve Berkeley's objection.
- 1.2 As per Berkeley's Reg.19 representations<sup>1</sup>, Part (2) of the policy requires the strategic sites to achieve a minimum of a 12% BNG. Linked to Berkeley's Matter 4 (Issue 2, Q5b) this criterion should only seek a minimum 10% BNG.
- 1.3 Part (2) of the policy requires that "*any SuDS features will be incorporated into the provision of biodiversity gain*". This is not considered to be effective as it may be appropriate to include SuDS features which do not directly contribute to BNG. This requirement should be deleted, or a more flexible wording included to resolve Berkeley's objection.
- 1.4 Part (3) requires that "*proposals must demonstrate how they will deliver tree-lined streets within the new settlement*". This part of the policy is not effective or consistent with national policy. In some cases, tree lined streets are not appropriate noting NPPF Para 131. The policy should be modified to require tree lined streets unless justified. We note that in the Council's suggested modifications (SD14, PDF page 15<sup>2</sup>) this text might have been deleted (if so, this would resolve Berkeley's objection).

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<sup>1</sup> Response #1198968, see Para 6.2 to 6.8

<sup>2</sup> HM052, SD14

- 1.5 Part (4) sets out measures that developments are expected to include to contribute to the achievement of net zero carbon. However, this repeats other policies in the plan (i.e. SP7 and SP9) and from text within policy HA1 itself. The policy should refer to developments needing to contribute to the achievement of net zero carbon, rather than how it should achieve it to resolve Berkeley's objection.
- 1.6 Building on the objections raised in our Reg.19 representations, Berkeley seeks further amendments to Part (4) linked to our Matter 3 statement<sup>3</sup>. Part (4) requires strategic developments to “*contribute to water neutrality*”. This wording should be deleted as Policy SP9 already deals with matters related to water neutrality (including for situations where the need to demonstrate water neutrality may no longer be required – Part SP9[7]). This would resolve Berkeley's objection.
- 1.7 Part (5) refers to developments enabling the provision of lower cost housing models such as ‘Community Land Trusts’ (‘CLTs’). Berkeley is willing to explore housing delivery through a CLT model; however, this will be dependent on a CLT being in place and having sufficient resources. These factors are out of Berkeley's control and the policy should be suitably caveated to be effective. This would resolve Berkeley's objection.
- 1.8 Part (7) requires strategic developments to deliver employment land and other opportunities sufficient to meet the principle of one new job per home. This is considered overly prescriptive as a requirement and is unjustified. A suitable modification to amend Part (7) would resolve Berkeley's objection.

**The justification refers to “Strategic Scale allocations” and “smaller housing allocations” and the policy refers to land allocated for “strategic scale development”. Is it clear which sites this policy applies to?**

- 1.9 No, **Berkeley objects**. A specific reference should be made (in Policy HA1 or in supporting text) that confirms policy HA1 applies only to Strategic Allocations: i.e. HA2 to HA4. A suitable modification would resolve Berkeley's objection.

**Q2. Paragraph 10.125 of the Plan says the total number of homes for each site allocated is expected to be within 10% of the figure quoted, is this justified and effective? The policies also refer to a number of homes to be delivered within the plan period in different ways e.g. ‘at least’, ‘approximately’? Is this effective??**

- 1.10 No comment.

**Q3. Are the allocation policies all consistent with the wording in the NPPF and legislation with regard to heritage assets? e.g. preserve or enhance the character or appearance of a Conservation Area?**

- 1.11 No, **Berkeley objects** to part (6) of policy HA3 regarding heritage assets<sup>4</sup> as it is not consistent with national policy (NPPF paragraph 35d). The policy requires development to

<sup>3</sup> See response to Matter 3, Issue 2, Q10e

<sup>4</sup> See Response #1198968, see Para 6.23 – 6.24.

*“preserve those elements of the heritage assets and their settings that are significant in illustrating their historic and architectural interest.”* This wording is not consistent with the NPPF (Sep 23) paragraph 202 test that seeks to establish if development will lead to less than substantial harm (i.e. it does not require preserving elements of assets or their setting), and then weigh the harm against the public benefits of the proposal. A modification to delete this line of the policy would resolve Berkeley’s objection<sup>5</sup>.

**Q4. Are Figures 7-9 consistent with the submission Policies Map, particularly the site allocation boundaries? What is the purpose of including Figures 7-9 in the Plan, are they effective? Do they reflect the proposed level of development within the Plan period? Should they be referred to as illustrative masterplans unless approved as part of a planning application?**

- 1.12 No. **Berkeley objects** to Figure 8 within the submitted plan (page 194, SD01)<sup>6</sup> and it should either be deleted, updated to match the plan shown at Appendix 1 (prepared by Berkeley), or at the very least show the current plan but referred to as being ‘illustrative’. The preference for deleting/updating Figure 8 is because policy HA3 requires a masterplanned approach. That masterplanning work is ongoing with the latest land use plan at Appendix 1 to this statement. This plan reflects Berkeley’s masterplanning to date in response to ongoing technical assessment, the requirements of Policy HA3, and engagement with the Council. Figure 8 as shown therefore serves no practical purpose. It is inconsistent with Policy HA3 and is not effective (NPPF paragraph 35c).
- 1.13 Berkeley notes that the Council has proposed a modification<sup>7</sup> that would confirm Figure 8 (as currently shown) is illustrative to *“reflect the potential for the masterplan to be updated in response to evolving evidence”*. This modification – while useful – would still leave in a land use plan that has already been superseded by the masterplanning work undertaken by Berkeley and therefore is without a clear purpose or function in the plan and potentially misleading (i.e. NPPF paragraph 16d).

**Q5. Should Policies HA2-HA4 explicitly state whether or not a masterplan will be required as part of any planning application and whether such masterplans should include details of the phasing of development based on the development constraints and infrastructure provision?**

- 1.14 No, **Berkeley objects** to Policy HA3 on the basis that it is not sufficiently clear as to when a masterplan is needed; therefore, the policy is not effective (NPPF paragraph 35c).
- 1.15 In Berkeley’s Reg.19 representations<sup>8</sup>, an amendment to Part (2) of the policy was suggested. A similar amendment to Policy HA3 is also proposed<sup>9</sup> by the Council including an amendment to Policy HA1 in respect of submitting a ‘phasing and implementation plan’<sup>10</sup>. Regarding the latter, Berkeley had assumed that such detail would be included within a ‘comprehensive masterplan’ submitted with the planning application (to accord

<sup>5</sup> Response #1198968

<sup>6</sup> Response #1198968, see Para 6.15 to 6.21.

<sup>7</sup> HMO86, SD14

<sup>8</sup> Response #1198968, see Para 6.13 to 6.14

<sup>9</sup> HMO74, SD14

<sup>10</sup> HMO53, SD14

with HA3). Modifying policies HA3 and HA1 as the Council suggests would resolve Berkeley's objections.

**Q6. Are the employment requirements detailed in Strategic Policies HA2-HA4 consistent with other policies in the Plan? Should the requirements be specified in terms of both employment land and employment floorspace? Are the employment requirements specified within each allocation expected to be delivered within the Plan period?**

- 1.16 Berkeley supports the provision of 4ha of employment land at site HA3: consistent with Table 6, SP29. Policy HA3 itself should only refer to the amount of employment land to be delivered to ensure it is effective.

**Q7. Where do the neighbourhood centres sit in terms of the retail hierarchy set out in Strategic Policy 35 of the Plan? Will proposals for new neighbourhood centres need to be supported by retail impact assessment? If so, should this be specified in the relevant policies?**

- 1.17 Future applications for the strategic sites will not require a retail impact assessment as – in accordance with paragraph 90 (Sep 23 NPPF) – retail provision would be in accordance with an up-to-date local plan. Therefore, the policies do not need to specify the need for a retail impact assessment (noting Policy HA3, (2[b]) requires the neighbourhood centre to be subservient to Lintot Square).

**Q8. Do Strategic Policies HA2-HA4 have sufficient monitoring and review mechanisms?**

- 1.18 No. **Berkeley objects** as policy HA3 is not effective (NPPF paragraph 35c). Berkeley notes that the Council has proposed a modification to Policy HA3(7c) to insert a requirement for a 'comprehensive travel plan and construction Travel Plan' covering the build out with longer term commitments to embed the transport strategy<sup>11</sup>. This modification would resolve Berkeley's objection.

**Q9. Is Strategic Policy HA2: Land West of Ifield sound? a – k.**

- 1.19 No comment.

**Q10. Is Strategic Policy HA3: Land North West of Southwater sound? a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?**

- 1.20 The quantum of development proposed at 'Land North West of Southwater' in Policy HA3 has been arrived at following the submission and subsequent withdrawal of an outline planning application – submitted by Berkeley – for, inter alia, 1,500 homes<sup>12</sup> within a similar site boundary. When it was withdrawn, there were outstanding landscape and heritage objections.

<sup>11</sup> HM085, SD14

<sup>12</sup> Ref. DC/22/1916

- 1.21 Berkeley has since undertaken additional masterplanning and capacity work with the Council to arrive at a scale of development that (1) makes efficient use of the land delivering homes, employment, and community uses; and (2) reduces the scale of the development and provides sufficient land to resolve the previous landscape and heritage concerns (see pages 64 to 79 of H11). Berkeley therefore supports the quantum of development identified for the site in Policy HA3. This is noting that the Council’s site assessment report (H11) concludes that a development of 1,000 dwellings would be appropriate in this location – noting its scale on the edge of what is one of the largest and most sustainable settlements in Horsham district – and performs well against the assessment criteria (in H11) as well the Council’s sustainability appraisal.
- 1.22 In respect of the number of homes to be delivered in the plan period (2040) the policy refers to 735 homes being delivered (HA3[1]). The latest trajectory (HDO3) assumes the delivery of 825 homes to 2040. However, Berkeley considers all 1,000 homes allocated can be delivered by 2041 (i.e. the extended plan period – see Matter 8 Q1 and Table 1 below).

Table 1 HA3 – Delivery Trajectory

	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total (to 2040)	Total (to 2041)
HDC		45	60	90	90	90	90	90	90	90	90	90	825	915
Berkeley	40	70	80	100	100	100	100	100	100	100	60	50	950	1,000

Source: HDC03 & Berkeley Strategic Land Limited

- 1.23 Notwithstanding, **Berkeley objects** to the inclusion of a specific reference within Policy HA3 to the expected number of homes to be delivered within the plan period as it duplicates text in Policy SP37. A suitable modification would resolve Berkeley’s objection.
- 1.24 Finally, in respect of the neighbourhood centre and its uses, **Berkeley objects** to Part 2b of Policy HA3. A modification has been proposed by the Council<sup>13</sup> that would resolve Berkeley’s objection<sup>14</sup> to ensure the policy is clear and unambiguous (i.e. effective – NPPF Para 35c).

**b) Is this allocation consistent with The Southwater Neighbourhood Plan (2021) allocation for around 450 homes?**

- 1.25 The Southwater Neighbourhood Plan (June 2021) includes policy SNP2.2 for the delivery of up to 450 homes at ‘Land West of Southwater’: forming part of the now proposed ‘Land North West of Southwater’ allocation (Policy HA3). Draft Policy HA3 is not wholly consistent with policy SNP2 but, in accordance with NPPF paragraph 30 (Sep 2023), policies within Neighbourhood Plans can be superseded by subsequent strategic policies.
- 1.26 Policy HA3 will – subject to modifications – provide a suitable framework to deliver the allocation as a single holistic site; seizing the opportunities of what is a materially larger allocation.

<sup>13</sup> HMO75, SD14

<sup>14</sup> As suggested in Berkeley’s Reg.19 representations, see response #1198968, see Para 6.21

**c) Is the secondary school critical to the delivery of the development allocated what progress has been made to date are there any barriers to its delivery?**

1.27 Southwater – one of the largest settlements in the district – does not have its own secondary school and the need for a school has been established (as detailed in the Southwater Neighbourhood Plan<sup>15</sup> and agreed with West Sussex County Council<sup>16</sup>[WSCC]). This is in the context of known shortages in secondary places near to Southwater<sup>17</sup>. This site’s delivery enables the delivery of a secondary school for Southwater. Were WSCC ever to conclude a school was not needed, then that conclusion would not preclude the delivery of HA3 given that alternative secondary school provision would inevitably be made elsewhere.

1.28 In terms of progress, Berkeley is in active discussions with the Council and WSCC. The site (i.e. ‘Land North West of Southwater’) needs to be secured as part of the local plan following which the WSCC can secure an academy sponsor, seek both DFE approval, and necessary capital funding. Berkeley will make proportional financial contributions to the delivery of this school and provide the site for the school, which will be made available within an early phase of the development.

1.29 In terms of the location of the secondary school within the site, **Berkeley objects** to the location of the school site identified in Figure 8 and referred to at paragraph 10.104<sup>18</sup>. Berkeley is proposing a revised location further north in the site (akin to the location shown proposed in the withdrawn 1,500 home application<sup>19</sup>) as shown in the appended land use plan at Appendix 1 to this statement. The location shown in figure 8 is unsound because:

- 1 **Size:** The site would be of an insufficient size to meet WSCC’s requirements (as shown in table 2 below). Berkeley’s proposed location would meet WSCC’s requirement.

Table 2 Secondary School Plot Size Comparison

	Figure 8 Secondary School Site Size*	Berkeley latest Masterplan Secondary School Site Size**	WSCC Size Requirement
Plot Size (Ha)	7.2 ha	8.6 ha	8.6 ha

Source: Berkeley \*Based of Berkeley assessment \*\*See Appendix 1.

- 2 **Suitability:** It would be inefficient and potentially unsuitable as the current proposal would be bisected by an access road: splitting the school across two parcels of land, requiring students to cross between them over a key access road, and making some areas of the site unusable.
- 3 **Masterplanning:** The school site would have long non-active and secure frontages along the main spine road and access roads. These would reduce permeability through the development, reducing the potential for active travel links between Worthing Road and the proposed development. It would also result in the community hub being cut-off

<sup>15</sup> See Paras 4.21 to 4.24.

<sup>16</sup> As detailed in the Infrastructure Delivery Plan (pages 125-126, SP04) and in the Statement of Common Ground (Para 6.6, DC17).

<sup>17</sup> <https://www.bbc.co.uk/articles/c6pel999z6o>

<sup>18</sup> Noting the school location as identified in the Neighbourhood Plan

<sup>19</sup> Ref. DC/22/1916

from residential areas to the east, harming its vitality and viability. It may also preclude the allocation being able to deliver around 1,000 homes at appropriate densities.

- 1.30 In conclusion, it would be unsound to seek to fix or suggest a location for the secondary school through Figure 8. Notwithstanding, Berkeley is proposing a more suitable location for the school (see Appendix 1) broadly in the same location as was proposed in the former 1,500 home planning application. WSCC did not object to this alternative school site location identified in the planning application and has since reconfirmed that, in principle, it would be content with either school site location. This alternative secondary school site location could be reflected in an updated Figure 8 as per Appendix 1 of this Statement and referred to within an updated paragraph 10.104.

**d) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?**

- 1.31 Yes. The Council's transport evidence base (I06<sup>20</sup> to I10) identifies the need for physical improvements to the Hop Oast Roundabout that the delivery of the allocation will enable. The Council's site assessment (H11<sup>21</sup>) notes that its impact on the wider road network can be mitigated. Policy HA3 itself includes measures that will ensure the transport impacts will be suitably mitigated (i.e. Parts 2f and 7).
- 1.32 Furthermore, the Council is proposing a modification<sup>22</sup> to require planning applications to be supported by a comprehensive travel and construction plan: including a monitoring and review framework to ensure the effectiveness. Berkeley supports this modification.
- 1.33 Finally, it is of note that WSCC did not object to the withdrawn 1,500 home outline application based on transport impacts.

**e) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?**

- 1.34 Yes. The issue of air quality was considered as part of the site selection process<sup>23</sup>. Delivering the scheme in accordance with policy SP12 will ensure its impacts are suitably mitigated. It is of note that the Council's did not object to the withdrawn 1,500 home outline application in respect of air quality.

**f) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?**

- 1.35 Yes. The issue of flooding / drainage was considered as part of the site selection process<sup>24</sup>. The site also passes the sequential test<sup>25</sup>. Delivering the scheme in accordance with policy SP10 will ensure its impacts are suitably mitigated. It is of note that WSCC in its capacity as Lead Local Flood Authority did not object to the withdrawn 1,500 home outline application regarding water and flooding issues.

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<sup>20</sup> See para 8.4.2

<sup>21</sup> See pages 64 to 79

<sup>22</sup> HMO85, SD14

<sup>23</sup> See page 70, H11.

<sup>24</sup> See pages 71 to 72, H11.

<sup>25</sup> Page 7, Table 2, CCo4b.

**g) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?**

1.36 Yes. Consideration of the allocation’s potential impacts on heritage, biodiversity, and landscape were all considered as part of the site selection process<sup>26</sup>. Specifically, the Council concludes in its updated site assessment (H11) that:

- 1 **Heritage:** The most recent masterplan removes residential development to the south of Great House Farmhouse and moves previously proposed hockey pitches. This results in a ‘neutral’ score on heritage. It is also of note that Historic England<sup>27</sup> made no objection to the allocation at the Reg.19 stage.
- 2 **Biodiversity:** It is noted that “*there is a reasonable prospect of the impacts being mitigated, and the additional “Linear habitats” requirements being provided.*”; therefore, the site is rated as having a ‘neutral’ impact<sup>28</sup>.
- 3 **Landscape:** Berkeley has sought to reduce the number of homes and amend the masterplan to mitigate the previously identified adverse impacts<sup>29</sup>. These changes result in the scheme’s landscape assessment rating being upgraded to ‘neutral’.

1.37 Overall, it is apparent that the Council is content that a scheme according with relevant policies proposed in this plan can come forward and overcome the previous heritage and landscape concerns associated with the previous scheme.

**h) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?**

1.38 No. **Berkeley objects** to some of the infrastructure requirements and the wording of the policy in respect to them – as set out below – as they are not effective (NPPF paragraph 35c). However, modifications can resolve Berkeley’s objections.

- a Part 2d should be amended to refer to Berkeley providing land and ‘proportionate’ contributions to ensure the policy is effective (as identified in Berkeley’s Reg.19 representations<sup>30</sup>).
- b Berkeley supports the Council’s proposed modification to Part 2diii<sup>31</sup> to make the requirement for a secondary school clearer; therefore, making the policy more effective.
- c Berkeley supports the Council’s proposed modification to Part 7a<sup>32</sup> to clarify future updates to the walking and cycling strategy may be published as the scheme builds out, making the policy more effective.
- d Berkeley supports the Council’s proposed modification to Part 7bii<sup>33</sup> to clarify the need for an LTN1/20 compliant cycleway along Station Road at Christ’s Hospital

<sup>26</sup> See pages 67 to 69, H11

<sup>27</sup> Respondent ID: 1193303

<sup>28</sup> Page 68, H11

<sup>29</sup> Page 67-68, H11

<sup>30</sup> Response #1198968, see Para 6.21 and Page 20 Appendix 1.

<sup>31</sup> HM076, SD14

<sup>32</sup> HM078, SD14

<sup>33</sup> HM079, SD14



subject to the availability of sufficient highway land as this would make the policy more effective (as identified in Berkeley's Reg.19 representations<sup>34</sup>).

- e Berkeley supports the Council's proposed modification to Part 7ci<sup>35</sup> to refer to 'Worthing Road', making the policy clear and more effective.
- f Berkeley supports the Council's proposed modification to Part 7cii<sup>36</sup> to refer to equestrian users in respect of signalling the Hop Oast roundabout, making the policy clear and more effective.
- g Berkeley supports the Council's proposed modification to Part 7ciii<sup>37</sup> to refer to 'at least' four new accesses to the development. This would make the policy clear and more effective (a modification identified in Berkeley's Reg.19 representations<sup>38</sup>).
- h Berkeley supports the Council's proposed modification to Part 7cv<sup>39</sup> in respect of clarifying that the connections required should be to Worthing Road. This would make the policy clear and more effective (a modification identified in Berkeley's Reg.19 representations<sup>40</sup>).
- i Part 7vi requires a pedestrian/cycle crossing of the Hop Oast roundabout via a bridge, underpass, or toucan crossing). As per Berkeley's Reg.19 reps<sup>41</sup>, a suitable crossing will be provided as part of the signalisation of the Hop Oast roundabout to be delivered as part of the allocation. Berkeley had suggested a modification to Part 7vi for this crossing to be provided as part of the signalisation (with no other options included)<sup>42</sup>. Notwithstanding, the Council has suggested a sufficiently flexible modification<sup>43</sup> that would make the policy clear and more effective.

**Q11.**

1.39 No comment.

**2.0 Issue 2 – Whether the other sites (settlement site allocations) allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?****Q1 – Q17.**

2.1 No comment.

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<sup>34</sup> Response #1198968, see Para 6.26 and Page 20 Appendix 1.

<sup>35</sup> HMo80, SD14.

<sup>36</sup> HMo81, SD14.

<sup>37</sup> HMo82, SD14.

<sup>38</sup> Response #1198968, see Para 6.26 and Page 20 Appendix 1.

<sup>39</sup> HMo83, SD14.

<sup>40</sup> Response #1198968, see Para 6.26 and Page 20 Appendix 1.

<sup>41</sup> Response #1198968, see Para 6.26 and Page 20 Appendix 1.

<sup>42</sup> Response #1198968, Page 21, Appendix 1.

<sup>43</sup> HMo84, SD14



**Word Count: 2,998**

**Appendix 1 Land North West of  
Southwater – Land Use Plan**

The contractor is responsible for checking dimensions, tolerances and references. Any discrepancy to be verified with the Architect before proceeding with the works. Where an item is covered by drawings to different scales the larger scale drawing is to be worked to.

Do not scale drawing. Figured dimensions to be worked to in all cases.

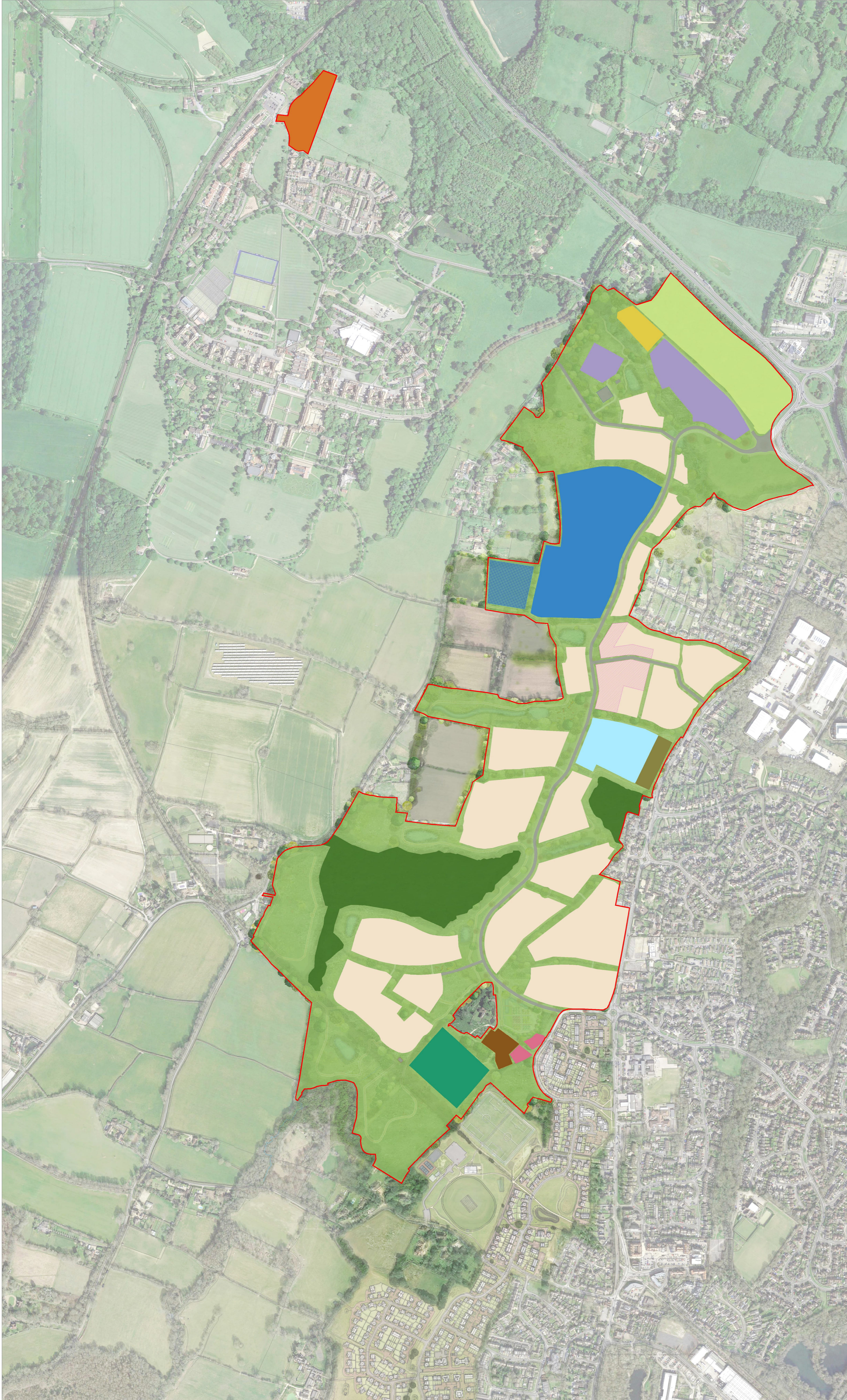
Where products have been specified, PRP have reviewed applicable products available in the UK at the time of writing the specification, from which products named in the specification have been selected.

Where the contractor wishes to propose alternative products, representative samples and a full technical appraisal should be submitted by the contractor to the employer demonstrating that their proposed alternative has equal or better performance.

Any alternative products are subject to design team, building control, warranty provider and employer acceptance.

CDM REGULATIONS 2015. All current drawings and specifications for the project must be read in conjunction with the Designer's Hazard and Environment Assessment Record

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**KEY**

- Site boundary
- Proposed residential
- Existing residential
- Mixed use community hub
- Employment
- Gypsy and Traveller site
- Secondary school
- Secondary school expansion area
- Primary school and nursery
- Great House Farm Barns commercial and community use
- Proposed sport pitches
- Allotments
- Station car park extension

All other areas include: existing hedgerows, ancient woodlands, drainage ponds, roads, etc.

- Proposed Infrastructure (primary road, substations, plant, etc.)
- Open Space including surface water attenuation and local access infrastructure
- Ancient woodland
- Woodland

**Please note:**

- Development parcels may include landscape features that are required to be protected
- No third party rights shall accrue on the application site
- All images are indicative only unless specifically marked for approval

C	Nov 2024	Information only	CY	CI
B	Nov 2024	Information only	CY	CI
A	July 2023	Information only	CY	SK
-	June 2023	Information only	CY	SK

**Land North West of Southwater**  
**Illustrative Masterplan**

**BA9817\_SKDR04** **REV C**

Information Only  
 DWN AS CKD CY DATE 29/06/2023 SCALE @ A1 1:5000

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