

Hourigan Planning
10th Floor Chancery Place
50 Brown Street
Manchester
M2 2JG
hello@houriganplanning.com
0333 939 8057



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

PLANNING APPEAL BY WAIN HOMES (NORTH WEST) LIMITED

AGAINST THE REFUSAL OF FULL PLANNING PERMISSION

BY HIGH PEAK BOROUGH COUNCIL

**FOR A RESIDENTIAL DEVELOPMENT OF LAND AT DINTING VALE, DINTING,
GLOSSOP, DERBYSHIRE**

**REBUTTAL STATEMENT BY MARC HOURIGAN BA(HONS) BPL MRTPI
TO PLANNING ISSUES RAISED IN THE PROOF OF EVIDENCE OF MR O'BRIEN
ON BEHALF OF THE COUNCIL**

PINS REFERENCE: APP/H1033/W/24/3339815

LPA REFERENCE: HPK/2022/0456

3 JUNE 2024



1. INTRODUCTION

INTRODUCTION

- 1.1 This rebuttal statement deals with planning issues raised by Mr O'Brien in his Proof of Evidence (PoE) produced on behalf of the Council.
- 1.2 This rebuttal statement should be read alongside the rebuttal statements submitted by Mr Tavendale (who deals with arboricultural issues raised by Mr O'Brien in his PoE) and Mr Heathcote (who deals with viability issues raised by Mr O'Brien in his PoE).
- 1.3 To assist the Inquiry I identify in sub heading form the relevant sections of Mr O'Brien's PoE and thereafter provide my rebuttal points.

SECTION 4.2 – KEY LOCAL PLAN (LP) POLICIES

- 1.4 In respect of Mr O'Brien's commentary on key LP policies at Section 4.2 of his PoE I comment as follows:
- 1.5 In terms of the remaining issues in dispute between the Appellant and the Council these relate to trees and viability. Mr O'Brien identifies LP Policies DS4, EQ9, H3 and H4 as being relevant. These are the policies quoted in the Council's Decision Notice under Reason for Refusal (RfR) 3. However, in his commentary in Section 4.2 Mr O'Brien fails to acknowledge:

- That Policy DS4 is not a policy to be read in isolation (see MY PoE at Paragraph 8.11).
- The full wording of the preamble to Policy EQ9 (see my PoE at Paragraph 8.15) (my emphasis added):

*"Requiring new developments **where appropriate** to provide tree planting and soft landscaping, including **where possible** the replacement of any trees that are removed at a ratio of 2:1"¹.*

¹ It is noted that it is later conceded by Mr O'Brien at Paragraph 5.14 of his PoE that the terms where appropriate and where possible are relevant.



- That Policy H3 is also not a policy to be read in isolation as it cross references Policy H4 which is a policy containing a viability aspect to it (see my PoE at Paragraph 9.9).
- That Policy CF7 whilst not contested by the Council is a policy containing reference to considering development viability as a valid planning consideration (MY PoE at Paragraph 9.9 refers).

SECTION 4.3 - KEY SUPPLEMENTARY PLANNING DOCUMENT (SPD)

1.6 Mr O'Brien refers to the Council's Developer Contributions SPD. A number of points are relevant in relation to this document:

- An extract from the SPD has been produced at Appendix 1 of Mr O'Brien's PoE but the full copy had been submitted with the appeal as Document 442.
- Reference to the Appellant's Full Statement of Case (FSoc) at Paragraph 8.57 noted that this SPD was adopted on 25 October 2023 i.e. between the date of the Development Control Committee (23 October 2023) and the date of the DN (27 October 2023) but that the DN does not allege any conflict with the SPD. As Mr Heathcote points out in his rebuttal statement (Paragraph 2.10 refers) the SPD contains provisions for detailed viability considerations to be considered at the application stage but these are omitted from Mr O'Brien's extract. Given that the Core Documents (CD) list had been agreed and printed at the time of writing (and the Council did not ask for the SPD to be included in the CD list) the Appellant will ask the Inspector to admit the SPD as an Inquiry document at the opening of the Inquiry, mindful of the fact that a copy had been supplied at the outset by the Appellant.

SECTION 4.5 - THE FRAMEWORK

1.7 Mr O'Brien identifies various sections of the Framework that he says are relevant to the appeal. The following is noteworthy in that respect:

- The Council's DN under RfR 3 alleges that the appeal proposals are contrary to the Framework but it does not identify a single section of the Framework that is of relevance.



- Paragraph 6.10 of the Council's SoC alleges that the agreed sums for the Planning Obligation are insufficient to meet the policy requirements of the Framework and at Section 8.3 it is further alleged that the proposals are contrary to the provisions of the Framework (again not a single relevant section is identified).

1.8 Having gone through the above exercise it is notable that when Mr O'Brien comes to deal with the main issues at Section 5 of his PoE there is no mention of any specific conflict with any specific section of the Framework; rather there is just a vague assertion at Section 5.2 of his PoE that the proposals are contrary to the Framework.

1.9 In light of the submitted evidence it is clear that the Council has failed to substantiate its RfR in respect of any alleged conflict with the Framework. This understandably has put the Appellant to unnecessary and waste expense and is unreasonable.

SECTION 5 MAIN ISSUES

1.10 At Paragraph 5.2 Mr O'Brien claims that Policy DS4 makes no express provision for viability appraisals to reduce the required 30% affordable housing provision. However, that assertion fails to acknowledge that the policy clearly states that it is not a policy to be considered in isolation as identified above. Clearly the policies of the LP are to be read together.

1.11 It is notable also that Mr O'Brien provides no explanation as to why the Council adopted a lower replanting ratio in respect of the Dinting Road proposals even though this decision was highlighted in the original appeal submission. The matter is taken up in my PoE Paragraphs 3.4, 8.19 - 8.23.

1.12 At Paragraph 5.19 Mr O'Brien introduces reference to the Council's HELNA (CD6.26). There is no dispute over what the HELNA has reported in terms of affordable housing need in the Borough although it is noted that the HELNA is looking over a much longer period (2021 - 2041) compared to the current Local Plan period (2011 - 2031).

1.13 However, the range of annual affordable housing need quoted from the HELNA by Mr O'Brien in Paragraph 5.20 of his PoE (129 - 180 dwellings per annum) is between 37% (rounded) and 51% (rounded) of the minimum annual average rate of development set out in Policy S3 of the LP (350 dwellings per annum).

1.14 Moreover, if the Local Housing Need (LHN) figure is used (246 dwellings per annum - given that Policy S3 has been deemed out-of-date by the Council for the purposes of calculating the 5 year



housing land supply position (see **CD6.3**) then affordable housing need is between 52% (rounded) - 73% (rounded) of the annual LHN figure.

- 1.15 It is also material to note and agreed between the parties that Policy H4 is out of date because it requires affordable homes on sites of less than 10 dwellings. This means that only sites that are defined as major sites (10 or more dwellings) are eligible to contribute to affordable housing.
- 1.16 Given all of the foregoing it is fairly clear that High Peak is an area where there will always be unmet affordable housing need where the target rate for affordable housing provision on developments between 10 and 24 units is 20% and 30% for developments of 25 units and above (Policy H4 refers) and yet the need per annum expressed as a percentage is much higher especially when non-contributing development of less than 10 units are factored in.
- 1.17 It is therefore unsurprising that the trend Mr O'Brien identifies in Paragraph 5.23 of his PoE exists. However, that trend has to be considered in the context of overall delivery of housing in the Borough over the LP period as the majority of affordable housing will be delivered as a consequence of market led sites. In that respect as Mr O'Brien relies on the HELNA it is pertinent to draw to the Inquiry's attention Table 9.11 of that document which illustrates housing delivery against the LP target up to 2021. This is reproduced below for ease of reference and adequately shows the poor housing delivery record in the Borough when measured against the LP. In fact, by 2021 the Council was 31% behind the minimum LP housing requirement.



Table 9.11 Net Housing Delivery for High Peak against Local Plan Targets

	Minimum LHN	Net Housing Delivery	Difference
2011/12	350	102	-248
2012/13	350	207	-143
2013/14	350	36	-314
2014/15	350	137	-213
2015/16	350	160	-190
2016/17	350	330	-20
2017/18	350	498	148
2018/19	350	386	36
2019/20	350	311	-39
2020/21	350	245	-105
Total	3,500	2,412	-1,088

Source: ONS LT122 additional dwellings by local authority district, England 2001-02 to 2020/21 / High Peak Local Plan, Adopted 2016: Policy S3

Figure 1 - Extract From HELNA (CD6.26).

- 1.18 I have to take exception to the terminology used by Mr O'Brien in Paragraph 5.24 of his PoE in that he states the development makes no attempt to meet the criterion of Policy H3. On a plain reading of the language used by Mr O'Brien that would suggest the Appellant is shirking its responsibilities. Nothing could be further from the true position which is one of a financial viability difficulty and that has been accepted by the Council and its viability consultants after careful consideration of the material provided by the Appellant .
- 1.19 At Paragraph 5.32 and 5.33 Mr O'Brien suggests that the weight to be given to financial viability testing within Policy H4 is questioned because CIL was never adopted. Mr Heathcote takes this up in his rebuttal statement but I would like to highlight that this is not an approach the Council has adopted on other sites. In that respect I produce at an **Appendix 1** an Officer's report relating to a Section 106A application for the Appellant's site at Chinley; an application for which I was the agent and an application which was approved by the Council. Attention is drawn to Paragraph 7.6 of the report which clearly sets out how the Council's policy was being applied in viability situations having regard to Policy H4. In my view there is simply no credible foundation for the assertions put forward by Mr O'Brien regarding Policy H4.



SECTION 6 - PLANNING BALANCE

- 1.20 I note that Mr O'Brien does not take up in his evidence the points made in the Council's SoC relating to removal of the site from the deliverable supply. I dealt with this matter in my PoE at Chapter 10 noting that it was a new matter not related to the RfR in the DN. Again, the Appellant has been put to unnecessary and wasted expense in dealing with this matter which is not then taken up in the Council's evidence.
- 1.21 As to the modest weight (Paragraph 6.2) Mr O'Brien affords to the delivery of 92 houses I fundamentally disagree especially in light of the poor delivery data in the Borough and the well accepted national housing crisis.
- 1.22 With regard to the neutral weight Mr O'Brien gives to Section 106 Agreement matters in the table that appears on Page 17 of his PoE reference to Paragraph 6.3 of his PoE acknowledges that these are in **part** mitigation, which must mean that he accepts that in part some are of benefit and hence they should be afforded positive weight. In that respect I would refer to Chapter 14 of my PoE where I identify positive and neutral effects of the provisions of the Section 106 Agreement and the wider development; in summary terms there are many positively weighted factors beyond mitigation which is ascribed neutral weight.
- 1.23 With regards to significant harm alleged by Mr O'Brien as a result of the inability to provide affordable housing this is dealt with in Chapter 15 of my PoE and I would re-emphasise that harm does not arise because the deficiency in the affordable housing position already exists. Rather no positive weight can be ascribed to the provision of affordable housing when making a decision because obviously none is provided.

Ends.

Appendix 1



**HIGH PEAK BOROUGH COUNCIL
DEVELOPMENT CONTROL COMMITTEE**

Date: 4th October 2021

Application No:	HPK/2021/0234	
Location	Former Forge Works, Forge Road, Chinley, High Peak.	
Proposal	Variation of section 106 planning obligation to reduce affordable housing provision relating to HPK/2012/0323 (appeal ref. APP/H1033/A/13/2189819).	
Applicant	Wainhomes North West Ltd	
Agent	Hourigan Connolly	
Parish/Ward	Chinley	Date registered: 07/04/2021
If you have a question about this report please contact: Rachael Simpkin rachael.simpkin@highpeak.gov.uk 01538 395400 extension 4122		

REFERRAL

This scheme has been referred as relates to a major development.

1. SUMMARY OF RECOMMENDATION

APPROVE

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

2.1 The application relates to the former Forge Mill premises, more recently known as the Dorma Works, which is located off Forge Road, Chinley. The whole site covers a total of 12.44 ha (hectares) and lies in a dip between the villages of Chinley and Whitehough. The site is nestled between Black Brook to the north and the Peak Forest Tramway to the south. It is located immediately to the south of the village of Chinley and north of the hamlet of Whitehough. The Peak Forest Tramway runs alongside the southern boundary of the site and the Black Brook watercourse borders and crosses the site on its northern side. Aligning the western boundary of the site is footpath 124, which links Forge Road to the Tramway. There are some habitats of local value within the site, as well as tree cover to the boundaries of the site.

3. THE APPLICATION PROPOSAL

3.1 A further application under Section 106A of the Town & Country Planning Act 1990 (as amended) has been received by the Council to modify the affordable housing provisions of the original Section 106 Agreement in relation to original the outline planning permission ref. HPK/2012/0323 allowed at appeal in May 2013 ref. APP/H1033/A/13/2189819. It follows the refusal of a similar scheme ref. HPK/2020/0517 'Variation of section 106

planning obligation to reduce affordable housing provision relating to HPK/2012/0323 (appeal ref. APP/H1033/A/13/2189819)' refused at the May 2021 committee meeting.

3.2 The original Section 106 Agreement requires inter alia for the development to provide 30% of the total number of dwellings to be erected on the site to be affordable units (60% as Social Rented and 40% as Shared Ownership).

3.3 A Supplementary Legal Agreement was entered into on the 20th November 2017 with revised clauses ensuring the provision of good quality affordable housing and facilitating a balance between securing the delivery of affordable housing in relation to the development of this part of the site, construction of a bridge and the commercial dwellings. There were also other amendments reflecting a phased approach such as the timing of agreeing a site management company for onsite private roads and any unsold areas of open space on the site. In relation to the onsite roads, it was noted that the Phase 1 roads were to be adopted and this also required a minor amendment. In addition, the Parish Council requested that offsite highways contribution be amended to better reflect need in the village and this was applied to improving accessibility to the railway station.

3.4 The first reserved matters approval ref. HPK/2013/0577 issued in January 2014 consisted of 91 dwellings and provided 27 affordable homes. The applicant has confirmed that the scheme has been developed and all commercial dwellings sold. As well, the 27 affordable homes secured as part of the original permission for this phase of development have all been transferred to a Registered Provider.

3.5 Reserved Matters approval ref. HPK/2016/0313 provides a further 62 dwellings of which 18 are to be affordable homes. The applicant states that the proposed number of affordable dwellings is slightly less than the policy compliant position of 19 units (due to rounding), but this position was agreed with the Council at the time of the reserved matters application on a tenure basis. The applicant confirms that 28 of these dwellings have been developed and sold. This includes 3 properties which have been transferred to the Registered Provider. Accordingly, a total of 15 affordable dwellings are required to be delivered under the provisions of the original Section 106 Agreement for this phase of the development. In total, the legal agreement requires a total of 42 affordable dwellings on site, of which 30 have been delivered. A total of 12 affordable onsite units therefore remain to be delivered within Phase 2.

3.6 The now applicant seeks the following amendments to the original Section 106 Agreement:

3.7 The Definitions Section provides that:

“Affordable Unit or Units means subsidised housing that will be available to persons who cannot afford to rent or buy housing generally available at the

open market and which comprise 30% of the total number of Dwellings to be erected on the Site and shall comprise 60% Social Rented Housing and 40% Shared Ownership Housing”.

3.8 Clause 2.5 further provides that:

“Subject to clauses 2.1 to 2.4 above 30% of the Dwellings which are constructed on the Site shall be Affordable Units (in accordance with current Homes and Communities Agency Standards) to be provided in accordance with each and every Reserved Matters Approval”.

3.9 The applicant proposes that the Definitions Section of the original Section 106 Agreement be amended to:

“Affordable Unit or Units means subsidised housing that will be available to persons who cannot afford to rent or buy housing generally available at the open market and which comprise 30 of the total number of Dwellings to be erected on the Site and shall comprise 16 Social Rented Dwellings and 14 Shared Ownership Dwellings”.

3.10 The applicant further proposes that Clause 2.5 of the original Section 106 Agreement be amended to:

“Subject to clauses 2.1 to 2.4 above 30 of the Dwellings which are constructed on the Site shall be Affordable Units (in accordance with current Homes and Communities Agency Standards)”.

3.11 The application to vary the legal agreement would deliver 30 (19.6%) affordable units on the site rather than 42 (30%) units secured by the legal agreement. It is based on the justification that it is no longer viable to deliver the amount of housing as required by the planning obligation. The submission is supported by the submitted Grasscroft Residential Viability Report dated November 2020 (the FVA) to support the submission.

3.12 The applicant’s intended planning appeal for ref. HPK/2020/0517 ‘Variation of section 106 planning obligation to reduce affordable housing provision relating to HPK/2012/0323 (appeal ref. APP/H1033/A/13/2189819) as refused does not yet appear to have been validated by the Planning Inspectorate.

4. RELEVANT PLANNING HISTORY

HPK/2020/0517 Variation of section 106 planning obligation to reduce affordable housing provision relating to HPK/2012/0323 (appeal ref. APP/H1033/A/13/2189819). Refused May 2021.

HPK/2018/0143 Residential development comprising 12 dwellings (open market and affordable), public open space and associated infrastructure together with a new car park for 1st Chinley Scout Group. Approved 26th March 2021.

- HPK/2016/0313 Reserved Matters application with details of the appearance, landscaping, layout and scale for Phase 2 of the residential development comprising of 62 dwellings and associated works pursuant to planning appeal reference APP/H1033/A/13/21898819 (HPK/2012/0312). Approved November 2017.
- HPK/2014/0582 Erection of a building to accommodate a D1 day nursery with ancillary worker accommodation and construction of a bin store – Approved February 2015.
- HPK/2013/0577 Application for Approval of Reserved Matters following Outline Approval For Phase 1 - Construction Of 91 No. Dwellings, 1no. B1 Office Unit And 1no.D1 Creche Unit Including Access From Green Lane / Whitehough Head Lane and Associated Works (Reserved Matters - Large-Scale Major) – Approved January 2014.
- HPK/2012/0323 Demolition of remaining structures & redevelopment for up to 182 dwellings, up to 1,672 sqm business floorspace (use class B1), up to 279sqm of non residential institution floorspace (use class D1), community facilities & associated infrastructure – Allowed at appeal May 2013.
- HPK/2011/0683 Outline application for the redevelopment of the site – Withdrawn February 2012.

5. PLANNING POLICIES RELEVANT TO THE DECISION

Adopted High Peak Local Plan 2016

- Policy S1 Sustainable Development Principles
 Policy S1a Presumption in Favour of Sustainable Development
 Policy H4 Affordable Housing
 Policy CF7 Planning Obligations and Community Infrastructure Levy

Supplementary Planning Guidance

- Housing Needs Survey
- Planning Obligations

National Planning Policy Framework (NPPF) July 2018

National Planning Practice Guidance (NPPG)

6. CONSULTATIONS

Council's Independent Financial Viability Consultant:

Viability Assessment Review Report, Forge Works, Forge Road, Chinley ref. HPK/2020/0518 and HPK/2021/0234

In preparing the FVA review, it confirmed that the Residential Viability Report: Former Forge Works, Chinley (November 2020) prepared by Grasscroft has been relied upon, together with the documentation listed from page 9 onwards of their Quantity Surveyor report.

Summary Conclusions:

“7.6 The outcome of our assessment and the financial appraisal results illustrate that the development at present is not sufficiently viable to support 30% affordable housing. With the 30 affordable dwellings already constructed and sold, then the development is viable. The residual land value is slightly higher than our assessed benchmark land value by £8,524. This sum is not sufficient to support additional affordable dwellings. However if there were further house price increases over and above build cost increases then this might be sufficient to support some additional affordable housing.

7.7 To demonstrate the position we have prepared some sensitivity testing which models 5% and 10% price increases for those remaining dwellings that have not yet sold. The testing assumes that all other costs remain the same. With 5% price increases across these dwellings the testing shows that the development could support a further 7 affordable dwellings – 4 rent and 3 shared ownership. Assuming 10% price increases then the development could support the remaining affordable dwellings up to 30%.

7.8 Realistically however such price increases are now likely to be offset to some degree by forecast build cost increases, so in reality we would not expect the application proposals to be able to support substantive additional affordable units over the period, other than those that have been provided to date.

7.9 As noted previously the Council has refused application ref HPK/2019/0561 which amongst other matters seeks approval for revised dwelling types for plots 110 – 114. Table 7.2 contains details of the revised dwellings types for these plots.

7.10 We have been asked by the Council to consider whether these changes have any impact on the overall viability of the scheme consented under the original outline application. Reflecting these changes we have adjusted the sales revenues and construction costs associated with the phase 2 development. We have also adjusted the benchmark land value to reflect the slightly greater net developable area.

7.11 With these changes made our conclusion remains the same in that the development would still not be able to support 30% affordable housing provision. Based on the 30 affordable dwellings already provided, the development is viable and again provides a small surplus over the benchmark

land value. As with the appraisal based on the consented scheme, this surplus is not sufficient to support further affordable housing”.

HPBC Regeneration Officer (Affordable Housing): As requested I have fact checked the information regarding the affordable housing within the KM report. To the best of my knowledge, the information on s106 contributions and completions is correct.

7. OFFICER COMMENTS

7.1 Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended) are a mechanism which makes a development proposal acceptable in planning terms, which would not otherwise be acceptable. In this case, the planning obligations, amongst other matters, secured onsite affordable housing provision and specified the type and timing of this housing.

7.2 If the s106 is not complied with, it is enforceable against the person whom entered into the obligation and any subsequent owner. The legal tests for a s106 agreement are: (i) necessary to make the development acceptable in planning terms, (ii) directly related to the development, and, (iii) fairly and reasonably related in scale and kind to the development. Under the Planning Act s106 (A) a person bound by the obligation can seek to have the obligation modified or discharged after five years. The principles for modifying an obligation are to consider whether the agreement continues to serve a useful purpose and should remain; that it no longer serves a useful purpose and should be discharged; or that it continues to serve a useful purpose, but would serve the purpose equally well if the modification proposed took effect.

7.3 When a developer makes an application under Section 106A to vary an affordable housing obligation, the Council must assess the affordable housing obligation and decide whether it prevents the development from being economically viable (i.e. when assessed together with all the other contributions due, the costs of development, for example abnormal costs associated with remediating contaminated land and expected profits) and if it does prevent the development from being completed whether that means the obligation no longer continues to serve a useful purpose.

7.4 If the Council finds that the obligation prevents the development from being economically viable, then the application should be dealt with in a way that safeguards and promotes the economic viability of the permitted scheme to which it relates balanced against a reduced affordable housing provision. In order to achieve this, the Council has two options:

- (1) it can modify the obligation either in the way the application suggests (or in another way if the applicant agrees), or,
- (2) it can remove the obligation altogether.

7.5 The applicant states that the submitted FVA (Financial Viability Assessment) provides a justification for not delivering the final 12 affordable

dwellings on the site as required by the planning obligation. Although, the applicant states that all other financial obligations have been paid relating to off-site highway works, open space, play space and primary school improvements and has established a site wide management company all as required by the original Section 106 Agreement and subsequent Supplementary Agreement.

7.5 In addition, the applicant further considers that it is a material consideration that the reserved matters approval has been granted for 153 dwellings rather than the 125 dwellings anticipated at the outline planning application stage. In response to this point, the original planning permission description included “up to” 182 dwellings rather than a fixed quantum of development and is material in these regards. The subsequent reserved matters schemes have delivered a total of 153 dwellings in accordance with Adopted Local Plan policy. The applicant does not envisage any more than 153 dwellings on the site through any subsequent planning applications. However, ref. HPK/2018/0143 has secured a scheme of 12 mostly executive dwellings on land adjoining the nursery.

7.6 In consideration of the above, LP (Local Plan) policy H4 ‘Affordable Housing’ includes a financial viability test to justify any reduced provision of affordable housing below the required 30% onsite provision policy level equating to 46 onsite affordable dwellings – the s106 agreement and fallback position requires a total of 42 affordable dwellings to be delivered.

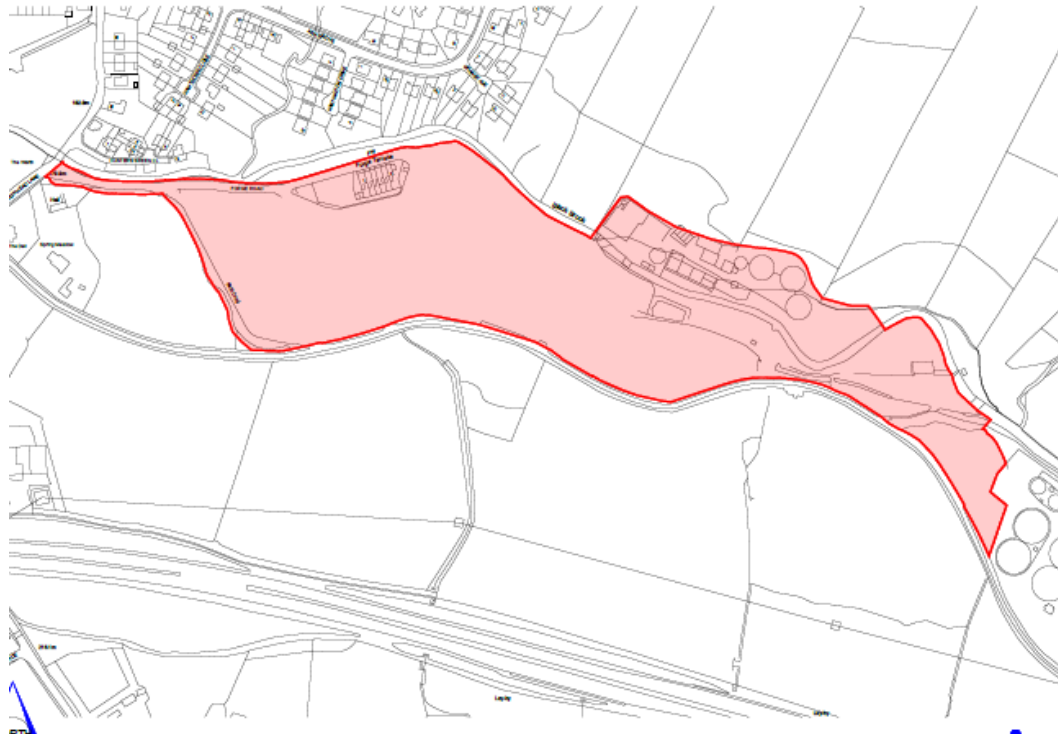
7.7 The Council’s Independent Financial Viability Consultant considers that the submission is currently sufficient to properly support the viability justification to omit 12 onsite affordable dwellings.

7.8 Accordingly Officers consider that the modification of the agreement would serve a useful purpose by facilitating the completion of the development which would otherwise be rendered unviable and is therefore recommended for approval.

8. RECOMMENDATIONS

- A. APPROVE, subject to legal agreement(s) to vary onsite affordable housing provision.**
- B. In the event of any changes being needed to the wording of the Committee’s decision (such as to delete, vary or add conditions/informatives/planning obligations or reasons for approval/refusal) prior to the decision being issued, the Head of Development Services has delegated authority to do so in consultation with the Chairman of the Development Control Committee, provided that the changes do not exceed the substantive nature of the Committee’s decision.**

Site Plan



ON PLAN



Geotechnical Engineering 1000	
Project Name: ... Location: ... Date: ...	Scale: ... Drawing No.: ... Revision: ...
Prepared by: ... Checked by: ... Date: ...	

FORGE ROAD, CHINLEY - Location Plan