

**STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL
PLANNING APPLICATIONS COMMITTEE**

9th March 2023

Application No:	SMD/2022/0662	
Location	Crossways Farm, Morr ridge Top Road, Onecote	
Proposal	Construction of portal frame building for the handling and storage of animal by products and the change of use of existing agricultural building for purposes associated with that use	
Applicant	Mr Mark Flanders (Flanders Fallen Stock)	
Agent	Mr Andrew Dukesell	
Parish/ward	Bradnop /lpstones	Date registered 20 th December 2022
If you have a question about this report please contact: Mr Benjamin Hurst tel: 07738506367 or e-mail benjamin.hurst@staffs Moorlands.gov.uk		

REFERRAL

The application is referred to Committee because it is considered to be locally contentious.

1. SUMMARY OF RECOMMENDATION

REFUSE

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

2.1 The application site, Crossways Farm, is positioned in an open countryside location approximately 1.3 miles south of the settlement of Onecote and approximately 4.5 miles south-east of Leek. The site essentially consists of an isolated portal frame agricultural shed (254sq m) located on a hardcore surface. There is an L shaped form of open mono pitch sheds that have low profile to the south western corner of the site. The site is to the south west of Morr ridge Top Road and has access via a straight 200m long track.

2.2 Although sited within Staffordshire Moorlands, the adjacent highway, Blakelow Road (Morr ridge Edge), forms the boundary between SMDC and the Peak District National Park. Blakelow road (Morr ridge Edge) is a stretch of road forming a ridge approximately 4.2 miles long running approximately North West/South East between the two planning authorities, with farms accessed by steep drives leading to farms and small holdings on both sides of the road. The cluster of buildings associated with Crossways farm is located approximately 250m from the main road, down a single width farm track/drive, finished with compacted hardcore and the yard area is finished with reclaimed road plainings.

3. DESCRIPTION OF THE PROPOSAL

3.1 The applicant 'Flanders Fallen Stock' proposes to occupy the existing farm shed at Crossways Farm as new operational premises for the business. A second much larger purpose designed portal frame building, more than twice the size (586 sq m), would be erected on the adjacent land. The proposed building would be built perpendicular to the existing building, offset from its corner by approximately 8m to allow articulated vehicles to pass through the gap between buildings, access the yard area and reverse into the recessed bay to the end of the building.

3.2 The site would provide a new 'knacker's yard' premises to handle and store the by- products from fallen stock and casualty animals that require on farm slaughter and are not for human consumption. The carcasses, fallen stock, animal parts and waste would be collected from farms in 3.5 – 7.5 tonne trucks and brought to the site to be handled, tested for disease, cut up and then stored until they are loaded onto articulated lorries and taken to JG pear's rendering plant in Bradford. There would be no on site rendering of the animal by products.

3.3 The application explains that the aim is to collect the carcasses as fresh, but that inevitably sometimes decomposition will begin and there will be an odour associated with that. The application therefore, details how a trailer bay inside the building would have an odour suppression system, utilised during summer months when temperatures rise within the bay. The system would include a ceiling fan combined with a misting system and what would be the equivalent of an industrial air freshener to release fragrance periodically. The application details the new building as unheated and uninsulated with the exception of the office and welfare area that would be formed using a corrugated cement cladding panel to maintain cooler temperatures naturally.

3.4 The remaining section of the building would be where the vans and lorries carrying the carcasses would be parked whilst unloading. It is explained that once the vehicle is in the building, the doors are closed fully whilst the vehicle is emptied and pressure washed clean, either to return to the road for another collection or to be parked overnight. The internal floor would be laid to falls to a linear drainage channel to collect the water from cleaning down. The main bay shall be split into four spaces across the width of the building allowing separate areas to be washed down. Drainage channels would be sealed with a stainless steel cover having perforations no larger than 6mmØ. The foul water would be collected in tankers.

3.5 It is said in the application that the business already provides daily collections across Staffordshire (including locations within the Staffordshire Moorlands), the Peak Park, South Derbyshire, Leicestershire and Warwickshire. They currently use a collection centre in Rugeley, said in the statement to be the centre of their busy customer base, and have existing knackers yard premises at Coalville in Leicestershire. The Rugeley centre is set to relocate to Twycross.

3.6 Normal working hours from Crossways would probably be 7am to 6pm mainly 5 days a week with exceptions for emergency out of hours call out. There are currently 5 full time staff operating out of the Coalville site, and it is said that this may increase if they pick up more customers locally following transfer to the Crossways site.

3.7 From the submitted statement and application details, the applicant presents the following strands to their case:

- There is pressure to leave the existing premises in Coalville and requires a new site;
- The business collects mainly from farms and equine premises which occupy rural locations, the premises should therefore also be in a rural location;
- The applicant and some of his drivers live in Leek; and,
- It is not appropriate for a more populated location, unpleasant odour for anyone in immediate vicinity.

4. RELEVANT PLANNING HISTORY

4.1 DET/2021/0047 – Change of use to commercial B2 use. Prior Approval required and refused.

5. PLANNING POLICIES RELEVANT TO THE DECISION

5.1 The development plan comprises the adopted Staffordshire Moorlands Local Plan 2020, Document SPD/SPG and supporting evidence documents.

Local Plan Development Plan Document (Adopted 2020)

S01	Spatial Objectives
SS1	Development Principles
SS2	Settlement Hierarchy
SS10	Other Rural Area Strategy
SS11	Churnet Valley Area Tourism Strategy
SD4	Pollution and Water Quality
E1	New Employment Development
E4	Tourism and Cultural Development
DC1	Design Considerations
DC3	Landscape Character
T1	Development and Sustainable Transport

National Planning Policy Framework

Adopted Supplementary Planning Documents/Guidance (SPD/G):

- Design Principles SPG
- Design Guide SPD adopted 21st February 2018

Local Plan Supporting Evidence Documents:

- Landscape and Settlement Character Assessment (2008)

6. CONSULTATIONS CARRIED OUT

Public

6.1 Neighbour notification letters and displayed site notice opened a period of consultation that required response by 30th January 2023.

6.2 105 Objections have been received, the following summarises the points raised:

- Blight from unpleasant odour escape and heavy vehicle movements impacting negatively on tourist business, people's livelihoods and living conditions.
- The service is not required in the area, it is already well served with same day collection available
- The site is adjacent to the National Park an area of beauty and tourist attraction
- Development would occur on a highly visible site

6.3 41 contributors have confirmed their support. 14 of those contributors are well-wishers who have not offered any comment. Many of the others are from local farmers who may already use the applicant's services, they comment that it will benefit the local farmer because there would be more rapid collections of dead or injured animals, injured animals would suffer less and dead animals have less time to decay. Many say that the applicant's services are highly professional and carried out with compassion and respect. Supporters also point to job opportunities and wish to support local business, and competition within the area for this type of service.

Parish Council

6.4 Onecote Parish Council – Objection. The site is located in an area of natural beauty metres from the Peak Park. Inappropriate location that would adversely affect the tourism industry. The animal carcasses will decompose and produce liquid waste and odours to the detriment of the environment. It is difficult to contain malodorous gases unless pressurised airlocks are employed. Unconvinced that the odours and effluent from the facility could be fully contained. The carcasses must be transported and both body fluids and odours will pollute the local environment, this type of transport vehicle has a very distinct odour as it travels through and stops in towns and villages along their route.

6.5 Bradnop Parish Council – Awaited.

Environmental Health

6.6 No Objection subject to conditions. There is a statement accompanying the application that details several aspects of the proposed operation. However,

it is not entirely clear the exact nature of the processing/preparation that will occur on site once the carcasses have been delivered and how long they may stay until being sent on to the rendering plant in Bradford. Possibly this will be dictated by the nature of the carcass.

6.7 There is clearly potential for offensive odours to be derived from the process but it is not considered that these would be of the magnitude of a typical rendering plant or similar. It is also noted that the nearest receptors are over 400m away, which would help in the dispersion of these odours and the area is predominately rural so some agricultural smells in the area would also be anticipated. It is therefore, considered that the odour from the facility could be effectively managed providing the operation is conducted as described in the statement. To ensure this is the case an enforceable odour condition is recommended. It is noted that the operator has included an odour suppression methodology (odour mist) for odour suppression / masking. This is welcomed, though the effectiveness of masking agents is somewhat unproven and the mist aspect is unlikely to be effective on non - particulate related odours. The application is for a storage/transfer station for dead agricultural animals. The site is a reasonable distance from neighbouring properties so noise if properly managed and controlled should not adversely impact amenity. It is noted there will be a rooftop fan unit used during warmer months to ventilate the storage building. We would recommend that this and all other industrial operations do not adversely impact prevailing sound levels.

Environment Agency

6.8 No comment, the constraints fall outside the agency's remit. The onsite processes will be regulated under a DEFRA T22 exemption, and as part of this the development will be required to meet the requirements of environmental permitting regulations, namely to prevent emissions to land, water or air.

SMDC Waste Collection

6.9 No issues

Staffordshire County Council Highways

6.10 No objection subject to conditions requiring access surfacing improvement rear of the carriageway edge. Parking for 6 vehicles is detailed on drawing with vehicle tracking for the turning of articulated lorries. The existing access has good visibility.

Peak Park District National Park Planning Authority

6.11 The Peak District National Park Authority submitted comments in response to this application on the 18th January 2021. The comments were mainly in relation to the possible transport impacts of the proposal on the road network of the National Park and the lack of available information upon which to assess those impacts. Following the submission of those comments, the National Park Authority were made aware of the submission of a Transport

Statement in submission of the application. This Transport Statement does provide some additional information with regard to possible traffic movements, but does not really assess what impact or not these additional movements might have on traffic flows along Blakelow Road. It is clear that the operation of the Flanders Fallen Stock will include the importation of all fallen stock through the Peak District National Park along Blakelow Road to access Crossways Farm. In addition, all fallen stock will then be subsequently transported away from Crossways Farm through the National Park along Blakelow Road, ultimately to Bradford to a rendering plant.

6.12 Whilst the operation may be supportive to some farmers within the National Park, the facility will include the import of fallen stock from a much larger area than the National Park. Whilst the site is located outside of the National Park, the appropriateness of such a facility serving such a large area adjacent to the National Park boundary is of great concern. This is particularly the case, as it is clear from the Transport Assessment that it is likely that all journeys to and from Bradford containing all of the stored carcasses for rendering will be made across National Park roads.

6.13 Whilst recognising the need for Flanders Fallen Stock to identify and secure an alternative location for their operation, the overall benefit of this site, beyond convenience to the applicant is not clear. Whilst accepting that the customer base for the operation includes some National Park farms, the current operation at Coalville includes customers from a wide area beyond the National Park. A more central location with easier access to Bradford would appear more appropriate, especially given the constraints of the Peak District Road network as described within the Transport Statement.

6.14 The statement accompanying the application makes it clear that: - "Without the rendering process taking place on the FFS site, the smells associated with a rendering plant are not present." However, later in the statement, whilst making the case for why the business should not be located on an industrial estate, there is the following statement "If Flanders Fallen Stock were to be sited on an industrial estate they would probably have immediate neighbours around us. Although they have strict odour management plans in place there would still be an unpleasant odour for anyone in the immediate vicinity." It is unclear from the statement what range the immediate vicinity encompasses. However, given the close proximity of the National Park boundary there is the potential for this to include the National Park and for this to negatively affect the amenity of National Park residents. It is also of concern that this might also affect the enjoyment of the special qualities of the National Park by visitors to this area. Whilst the site is located outside of the National Park boundary, the impact of development in close proximity to that boundary on the National Park and its statutory purposes should form a key factor in determining this application. This is particularly important because of the duty laid on Staffordshire Moorlands District Council to have regard to National Park purposes in undertaking their own role.

7. OFFICER COMMENTS/PLANNING BALANCE

The Local Plan Strategy Approach to Development in the Rural Areas

7.1 The site is in an 'other rural' countryside location, isolated and remote from any of the Local Plan defined villages or settlements. It also falls within the Churnet Valley, identified as an area for sustainable tourism and rural regeneration, where the Churnet Valley Master Plan provides a comprehensive framework for development. Here, Local Plan 'other rural area' strategy SS10 and Churnet Valley Strategy SS11 apply. The concept of sustainability argues in favour of concentrating most development in or adjoining existing built-up areas. There can be cases where development and diversification in the countryside can benefit the rural economy. However this needs to be appropriate to the character of the countryside which also needs to be sustained. Where development in the open countryside is justified, the preference will be for the re-use or redevelopment of existing buildings. All development in these areas will be strictly controlled, both in terms of its scale and type in order to ensure that the character and role of the countryside is not undermined.

7.2 Strategy SS10 provides only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. This to be achieved by, inter alia, enabling the limited expansion or development of business for employment uses where a rural location can be justified and supporting the diversification of existing farm enterprises. Enhancement and conservation of the quality of the countryside is to be achieved by "giving priority to the need to protect the quality and character of the area and requiring all development proposals to respect and respond sensitively to the distinctive qualities of the surrounding landscape; and limiting uses which generate a substantial number of regular trips in areas that are not well served by public transport".

7.3 Strategy SS11 states that in this area particular support will be given to the provision of visitor accommodation, the expansion and provision of tourist attractions and measures to enhance and protect landscape character. Any development should be of a scale and nature and be of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features.

With consideration for principles of sustainability and the local plan strategies for the area, is there a justification to provide the development in the proposed 'other rural' location?

7.4 The proposal is to erect a sizeable new building, with associated lorry park, in an isolated 'other rural' countryside location for purposes other than agriculture. It does not represent genuine farm diversification and the reuse of the existing building is a limited part of the proposal. The site is isolated and accessed via the network of rural roads and lanes that connect the rural villages and towns. The development would have a visual impact on the landscape in an exposed, isolated hillside position to the boundary of the Peak Park. It would involve multiple collections in articulated lorries that haul to the motorway network and routes to Bradford. Very broadly the Local Plan strategy for the other rural areas (SS10) is to direct non-agricultural business to locations closer to the settlements, this in the interests of good sustainable principles.

7.5 The applicant's existing knackers premises is in Coalville, Leicestershire. It was an established knackers yard when the applicant moved to that premises. There is an extant planning permission to provide new improved facility for the applicant in that location. An alternative scheme to develop the land for a different client is still pending with that planning authority, but in any event the red edge of that application does not include the existing knackers yard and it is not obvious that the alternative development should effect it. Nevertheless, the applicant insists that he has been asked to leave his existing site and is under pressure to relocate.

7.6 The application details how the existing operation collect from many farms and sites across a vast geographical area and transport to collection/holding facilities at their existing Coalville yard and a collection centre in Rugeley (to be relocated to Twycross). From these sites the by-products are hauled in articulated lorries to rendering plant in Bradford. Rugeley is described in the application as being "central to the customer base". The obvious advantage with all three of those application sites, is that they all have good connections and proximity to the M1 motorway, providing good direct access to and from the rendering plant in Bradford. The Crossways application site, conversely, does not share these advantages, it is not well located for journeys to Bradford and is remote from motorway connections. In any direction, the lorries 2 -3 collections a week, must, for a considerable distance, pass along rural roads and lanes, through a number of towns and villages. Slower moving large vehicles through built up populated areas are inefficient with poor fuel economy and high vehicle emissions.

7.7 The business collects from multiple locations across a wide geographical area. The statement points to Rugeley as being central to their customer base. Obviously, the customers are in rural locations, but they are spread over a wide area and placing the knackers facility in one rural area does not necessarily bring sustainable credentials, locating closer to one selection of customers means it is further away from others. The Staffordshire Moorlands and surrounding locality are already served by knackers facilities at Thorncliffe

and Buxton, with a rendering plant in Cheddleton. All of these facilities would be by passed by the proposed development, favouring instead, the collection of Moorland's fallen stock and hauling it all of the way to Bradford for rendering. There is nothing specific about the application location that can be justified on sustainability credentials, it does not make reuse for existing building or facility and would not diversify an existing farm enterprise. Moreover, associated transport logistics would appear to be manifestly unsustainable. In these regards the development would be contrary to policies SS1, SS10 and T1 of the Local Plan.

Impact on Landscape Character

7.8 The development would involve the construction of a sizeable portal frame building and the introduction of parked haulage vehicles in an exposed, open and prominent hillside location. The development would be intrusive, prominent and conspicuous from the vantage of the public highway. It would appear in a landscape character type identified in the assessment as 'Gritstone Highland Fringe', a landscape of the highest sensitivities where busy roads are listed as an incongruous landscape feature. The development would lead to prominent intrusion into the countryside and fail to enhance and conserve the quality of the countryside and the landscape character. In these regards the development would be contrary to SMDC Local Plan Policies SS10, SS11 and DC3 and the terms of the NPPF.

Impact on the Amenity of the Area (particular consideration for odour)

7.9 Clearly the development would hold and process animal carcasses and by product, material that has the potential to be the source of offensive odour. To address such concerns, the applicant explains how their approach is compliant with their governing body, none of the vehicles would be loaded or unloaded outside of the building or left outside for prolonged periods. It is detailed that inside the building the collection vehicle would be emptied directly into the lorry trailer using a telescopic forklift type machine, or, when an animal is prepared for the examination of a vet, the process does not differ to that of a butcher or abattoir, using knives and hand held saws for dissection on a recently deceased animal that it yet to decompose.

7.10 The applicant presents correspondence from the Environmental Officer in Leicester who has attended the Coalville site on a number of occasions, responding to complaints from the neighbour about odours. He reports that in his findings there were no unpleasant odours outside of the building during his visits. The applicant points to the odour suppressant system and a building design that would retain cool internal temperatures at around 5 degrees for most of the year, except on the hottest of days. They explain that they are collecting fresh carcasses from farms, as opposed to Pointon/Advance Proteins who collect carcasses from abattoirs where they may have been in the yard for a week or so until full. The applicant says that they only have one trailer to fill and this would be emptied after 4 days, carcasses which are at most 5 days old and kept in a cool environment would not be decomposing. It is said that the applicant has been voted onto the governing body of his regulatory body,

because of his efforts toward raising industry standards and minimising disturbance to the surrounding community. The applicant says that his vehicles have been making collections in the Staffs Moorlands and Peak Park for many years without complaint, the vehicles parked overnight in the open, close to schools and houses, are odourless because they have been thoroughly cleaned and disinfected.

7.11 The Council's Environmental Health Officers consider there to be a clear potential for offensive odours to be derived from the process but do not expect these to be of the magnitude of a typical rendering plant or similar. They largely expect odours to be controllable and, subject to conditions, ultimately do not object or anticipate a statutory nuisance. Their approach however, does hold a note of caution, reasoning, as a caveat, that in this rural area agricultural odours are not uncommon in the area, and noting that the effectiveness of masking agents is somewhat unproven and the mist aspect is unlikely to be effective on non - particulate related odours.

7.12 With consideration of the applicant's own evidence, it is of note that they admit to unpleasant odours "within immediate vicinity", the point is made to justify a rural location as opposed to one with proximity to more built up/populated areas, stating that "although they have strict odour management plans in place there would still be an unpleasant odour for anyone in the immediate vicinity", odours that would impact neighbours on an industrial site for example. The application statement also acknowledges that there will be occasion where collected carcasses have begun to decompose, cases where animals have wandered from the herd or flock to die are provided as an example. While the Leicestershire Environmental Health Officer, confirms that on his visits he was unable to identify odour outside the building, it is apparent that he was responding to complaints from a neighbour, suggesting that unpleasant odour can on occasion be experienced or be a matter of perception or sensitivity.

7.13 Overall it appears that largely unpleasant odours can be controlled and suppressed and that within this rural, agricultural area impacts would not amount to statutory nuisance. However, taking all of the evidence as a whole, there does appear to be a potential or inevitability of some unpleasant odour being associated or perceptible, at least on occasion. In these regards, it is of note that the site is located in an area of the Churnet Valley defined as the "Peak Park Fringe". Here tourism enhancement is a particular strategy priority and there are obvious sensitivities relative to that. It is anticipated that unpleasant odours notable or different against those from agricultural activity will be perceptible. Due to the nature of the development, noticeably unpleasant odours, carried on the wind or passing transport, are inevitable and this would adversely affect the experience and perception of visitors to the area and the tourism businesses that rely on their patronage. In these regards the development would be contrary to SMDC Local Plan Policies SS10, SS11 and SD4 and the terms of the NPPF.

Highway Safety

7.14 The Highway Authority have not objected to the development. The access has good visibility and highway safety would not be compromised over and above the existing and normal use of the network to transport goods and products through settlements and rural areas.

Other Considerations

7.15 Overall the application does not demonstrate benefits or justification for this application site specifically. It has not been demonstrated that it would create employment within the area or other benefits to the rural economy that would outweigh the harms identified above. The statement suggests only that they may employ more people if they pick up additional customers in the locality, but the specifics of employment generation are not evidenced or detailed. The application does not make a case that farms within the area have no such service available, clearly they are already served by both collection facility and rendering plant within proximity. The relocation of the applicant's operating centre might generate some competition within the area that could affect prices and customer choice, but any such benefits would not outweigh those harms identified above.

7.16 Pressures on the applicant to move from his existing, well located site in Coalville, does not itself justify the specific location of the application site, which may, by coincidence and opportunity, be available. The proposal would not present any specific benefit in terms of connecting to the preferred rendering plant in Bradford or other customers outside of and beyond the Moorlands or the Peak District fringe. The proposed location would not deliver obvious benefits to the rural economy within the locality that would outweigh the harms.

8. Conclusion

8.1 The application has not justified the provision of the development in this isolated 'other rural' countryside location within the 'Peak District Fringe' of the Churnet Valley. The development would provide a sizeable new building and associated lorry park that would have: adverse impacts on the landscape; involve multiple long journeys to and from the site by heavy vehicles which are dependent upon, but remote from, the motorway network; and the potential to release unpleasant odours, both from the site and vehicles as they pass through towns and villages. For all of these reasons the development would be incompatible with the adopted tourism strategy for the area and principles of

sustainability. The development would contravene SMDC Local Plan Policies SS1, SS10, SS11, SD4, E1, E4, DC3, and T1 and the terms of the National Planning Policy Framework (NPPF). The application has not demonstrated that benefits or other considerations would outweigh, or justify the development against, those harms.

9. RECOMMENDATION

A. That planning permission be REFUSED for the following reason(s):

1. The application has not justified the provision of the development in this isolated 'other rural' countryside location within the 'Peak District Fringe' of the Churnet Valley. The development would provide a sizeable new building and associated lorry park that would have: adverse impacts on the landscape; involve multiple long journeys to and from the site by heavy vehicles which are dependent upon, but remote from, the motorway network; and the potential to release unpleasant odours, both from the site and vehicles as they pass through towns and villages. For all of these reasons the development would be incompatible with the adopted tourism strategy for the area and principles of sustainability enshrined in the rural strategy. The development would contravene SMDC Local Plan Policies SS1, SS10, SS11, SD4, E1, DC3, and T1 and the terms of the National Planning Policy Framework (NPPF). The application has not demonstrated that benefits or other considerations would outweigh, or justify the development against, those harms.

2. The development would involve the construction of a sizeable portal frame building and the introduction of parked haulage vehicles in an exposed, open and prominent hillside location. The development would be intrusive, prominent and conspicuous from the vantage of public highway. It would appear in a landscape character type identified in the assessment as 'Gritstone Highland Fringe', a landscape of the highest sensitivities where busy roads are listed as an incongruous landscape feature. The development would lead to prominent intrusion into the countryside and fail to enhance and conserve the quality of the countryside and the landscape character. In these regards the development would be contrary to SMDC Local Plan Policies SS10, SS11 and DC3 and the terms of the NPPF.

3. Although odours maybe manageable to some degree, the site is located in a particularly sensitive area of the Churnet Valley 'Peak District Fringe' where the promotion of tourism is a strategy priority. Due to the nature of the development, noticeably unpleasant odours, carried on the wind or passing transport, are inevitable and this would adversely affect the experience and perception of visitors to the area and the tourism businesses that rely on their patronage. In these regards the development would be contrary to SMDC Local Plan Policies SS10, SS11 and SD4 and the terms of the NPPF.

10. APPENDICES TO THE REPORT

10.1 The link below to the Council's website is where the detail of this application can be viewed.

<http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=166028>

Crossways Farm, Morridge Top Road, Onecote – location plan



Site Location Plan