

Biodiversity Net Gain Plan

Carr Hall, Whalley Road, Wilpshire

CHWR-EVE-RP-ECO-02

DECEMBER 2025

CONTACTS

HENRY GUNNING
Director

dd [REDACTED]
e [REDACTED]

Evelyn Ecology Limited
19 Clarendon Road
Audenshaw
Manchester
M34 5PP



Biodiversity Net Gain Plan

Carr Hall, Whalley Road, Wilpshire

Author Henry Gunning

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Executive Summary

Evelyn Ecology Ltd was instructed by Bramley - Pate + Partners Ltd to undertake a Biodiversity Net Gain (BNG) assessment at Carr Hall, Whalley Road, Wilpshire, in support of a planning application comprising the installation of an area of hardstanding.

The assessment was informed by a detailed UKHab survey and condition assessment carried out across the Site in November 2025, with habitat mapping and classification completed in accordance with the UK Habitat Classification v2.0 and the Statutory Biodiversity Metric (February 2024). The results of this assessment have been used to calculate baseline habitat units and model post-development changes based on the latest Proposed Plans.

Following the input of baseline and post-intervention data into the Biodiversity Metric, the following results were obtained:

- Habitat units: -0.14 units, representing a -15.54% net loss.
- 'No net loss' in hedgerow units.

The development therefore does not currently achieve the statutory minimum of 10% biodiversity net gain in habitat units, as required by the Environment Act 2021 and paragraph 180 of the NPPF.

To achieve the statutory 10% net gain, the scheme requires an uplift of 0.24 habitat units and 0.01 hedgerow units.

Given the constrained, heavily developed industrial setting of the Site, there is limited physical space available for additional on-site habitat creation beyond enhancement of retained grassland and replacement tree planting. The BNG strategy for the Site will therefore comprise a hybrid approach:

- On-site delivery through replacement tree planting and enhancement of retained grassland which should be secured by the approved landscape scheme and captured in the Biodiversity Net Gain Plan; and
- Off-site delivery of the remaining biodiversity units required to achieve at least 10% net gain, via the purchase of off-site biodiversity units from an appropriate habitat bank or other off-site scheme agreed with Ribble Valley Borough Council, with management secured for a minimum of 30 years.

Together, these measures will ensure that the development meets the mandatory Biodiversity Net Gain requirement in accordance with the Environment Act 2021 and relevant local planning policy.

CONTENTS

1	INTRODUCTION	1
1.1	Background.....	1
1.2	Scope	1
2	PLANNING POLICY AND LEGISLATION	2
3	METHODOLOGY	3
3.1	Desk Study	3
3.2	Field Survey	3
3.3	UKHab Survey.....	3
3.4	Condition Assessment.....	3
3.5	Calculation of Biodiversity Units	3
3.6	Strategic Significance	4
3.7	Trading Summary	4
3.8	Limitations.....	4
4	RESULTS	5
4.1	On-site Existing Habitats and Condition Assessment	5
4.2	Habitat Retention & Loss	8
4.3	On-site Post-intervention Habitat Creation and Enhancement.....	8
4.4	Biodiversity Unit Calculations.....	9
4.5	Trading Summary	10
5	CONCLUSIONS AND RECOMMENDATIONS	11
5.1	Overview	11
5.2	Addressing the biodiversity loss	11
6	REFERENCES	12
	APPENDIX A – PROPOSED PLAN	13
	APPENDIX B – BASELINE HABITAT PLAN	14
	APPENDIX C – PROPOSED HABITATS PLAN.....	15

1 INTRODUCTION

1.1 Background

- 1.1.1 Evelyn Ecology Ltd was instructed by Bramley - Pate + Partners Ltd to undertake a Biodiversity Net Gain (BNG) assessment at land at Carr Hall, Whalley Road, Wilpshire, Blackburn, BB1 9LJ (hereafter referred to as “the Site”). This report sets out the findings of a Biodiversity Net Gain Plan (BNGP) in relation to the proposed development, which comprises the loss of modified grassland, five trees and replaced with a hardstanding area (hereafter referred to as “the proposed development”). The Proposed Plan showing the indicative proposed development is provided in Appendix A.
- 1.1.2 This report is submitted alongside Preliminary Ecological Appraisal produced by Evelyn Ecology, which should be read in conjunction with this BNGP.

1.2 Scope

- 1.2.1 This BNGP aims to:
- Provide baseline data to classify the type, distinctiveness, condition, and strategic significance of habitats prior to and post development.
 - Ensure that baseline habitat conditions are classified in a robust and consistent manner, and that classification is based on the best available data at the time of assessment.
 - Clearly identify data collection methods and any limitations.
 - Calculate baseline pre- and post-development habitat units for the Site based on current development proposals.
 - Achieve BNG on-site wherever possible; with off-site contribution measures considered as an alternative where required.

2 PLANNING POLICY AND LEGISLATION

- 2.1.1 The National Planning Policy Framework (NPPF) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by, among other things, minimising impacts on and providing net gains for biodiversity.
- 2.1.2 As of February 2024, Biodiversity Net Gain (BNG) is a legal requirement for most planning permissions under the Environment Act 2021, which mandates that all major developments in England must deliver a minimum 10% net gain in biodiversity value, as measured using the statutory BNG Metric. This applies both to on-site and off-site habitat interventions.
- 2.1.3 The statutory development plan for the area includes the Ribble Valley Core Strategy 2008–2028 (Adopted December 2014) and the Housing and Economic Development Development Plan Document, which together form the Local Development Framework for Ribble Valley and provide the strategic context for development and environmental protection in the borough.
- 2.1.4 Of particular relevance is Key Statement EN4 (Biodiversity and Geodiversity), which seeks to conserve and enhance the borough's biodiversity and geodiversity, avoid the fragmentation and isolation of natural habitats, promote green corridors and, as a guiding principle, secure a net enhancement of biodiversity through new development.
- 2.1.5 These aims are supported by Development Management Policy DME3 (Site and Species Protection and Conservation), which affords protection to statutory and non-statutory wildlife sites, priority habitats and species, requiring that adverse impacts are avoided where possible, otherwise mitigated or, as a last resort, compensated, and that opportunities for habitat restoration and creation are realised as part of development proposals.

3 Methodology

3.1 Desk Study

- 3.1.1 In order to inform an assessment of the habitat types and condition, a desk study was undertaken.
- 3.1.2 Aerial photography from publicly available sources was reviewed to understand the Site's ecological context, assess habitat connectivity to the wider landscape, and identify any changes to habitats since baseline survey data were collected. This helped to determine the reliability of baseline assumptions.

3.2 Field Survey

- 3.2.1 The UKHab survey was undertaken by Henry Gunning (2017-28633-CLS-CLS, 2022-10860-CL17-BAT & FISC Level 3) on 13th November 2025. Weather during the survey was overcast but dry.

3.3 UKHab Survey

- 3.3.1 A habitat survey was undertaken, following the methodology set out in The UK Habitat Classification Habitat Definitions Version 2.0 (The UK Habitat Classification Working Group, July 2023). All habitats are described and mapped and, where appropriate, target notes provide supplementary information on habitat conditions, features too small to map to scale, species composition, structure and management.
- 3.3.2 All habitat parcels have been mapped and labelled on the Baseline Habitat Plan provided in Appendix B.
- 3.3.3 Detailed habitat descriptions, including species composition, structure, and ecological context, are provided within the accompanying Preliminary Ecological Appraisal (PEA) report. This BNG Plan should therefore be read in conjunction with the PEA to ensure full understanding of habitat characteristics.

3.4 Condition Assessment

- 3.4.1 Habitat condition was assessed using the criteria in the Statutory Biodiversity Metric User Guide (DEFRA, 2024), applying a consistent methodology in line with national guidance.
- 3.4.2 The full condition assessment tables, including individual habitat criteria scores and assessment notes, will be provided as a separate supporting document to accompany this report (Carr Hall, Whalley Road – Statutory Biodiversity Metric Condition Assessments. Evelyn Ecology, 2025).
- 3.4.3 For habitats proposed to be created as part of the development, a precautionary approach was taken when assigning condition, particularly where post-construction management or biotic conditions may limit the ability to achieve high-quality habitat outcomes.

3.5 Calculation of Biodiversity Units

- 3.5.1 The Statutory Biodiversity Metric (February 2024) was used to calculate the change in biodiversity units and the overall percentage of gain / loss achieved.
- 3.5.2 Baseline data collected during field and desk studies were used to classify each habitat present on Site using UKHab 2023, with condition scores assigned in accordance with the metric guidance. This data formed the basis for the pre-development baseline calculation, generating values for area-based habitat units and linear features such as hedgerows.
- 3.5.3 The post-development scenario was modelled using the following drawing:
 - Carr Hall, Whalley Road, Wilpshire, Blackburn, BB1 9LJ. - PROPOSED EXTENSION TO HARDSTANDING – 7125 – PL 0.01.
- 3.5.4 Post-development habitat types and their spatial extent are illustrated on the Proposed Habitats Plan in Appendix C. These drawings support the post-intervention Biodiversity Metric calculations and should be reviewed alongside the metric outputs.
- 3.5.5 Scattered trees are not entered directly into the Metric. The canopy area is calculated using the 'Urban

tree helper' on the Main Menu of the Metric, entering the number in the calculator of trees for each size category and for each condition, which then calculates areas for each category in hectares. The resultant areas are then entered in the Metric in the category for Individual Trees. The area of habitat beneath the tree canopy is included separately in the calculation.

3.5.6 The Statutory Biodiversity Metric calculator should be read in conjunction with this report.

3.6 Strategic Significance

3.6.1 Strategic significance scores were assigned in accordance with the Statutory Biodiversity Metric User Guide (DEFRA, 2024). The Site was reviewed against available spatial datasets, namely the Lancashire 'Local Habitat Map' to determine whether it falls within an area formally identified in local biodiversity strategies. This included an assessment of proximity to or overlap with statutory designations (e.g. Sites of Special Scientific Interest, Local Nature Reserves), non-statutory designations (e.g. Local Wildlife Sites, Priority Habitats Inventory).

3.7 Trading Summary

3.7.1 The principle of 'Trading Up' has been applied in accordance with Biodiversity Metric guidance. This ensures that, where habitat loss occurs, compensation is delivered through the enhancement or creation of habitats of equal or greater distinctiveness and ecological value, provided that environmental conditions are appropriate and delivery will provide clear biodiversity benefit.

3.8 Limitations

3.8.1 The UKHab survey was undertaken in November, which falls outside the optimal period for habitat surveys (typically April to September). As such, the potential for some botanical species to be less easily identifiable at the time of survey is acknowledged. However, the habitats within the Site are characteristic of an urban setting, comprising predominantly managed lawn areas, trees and areas of hardstanding. These habitats are of low ecological value and readily identifiable outside the optimal survey season. Although an area of mature woodland is present adjacent to the site, it lies beyond the development footprint and will not be directly or indirectly affected by the proposed works.

3.8.2 The post-development habitat areas may be subject to change as the design evolves through planning. Consequently, the BNG values presented are indicative and should be updated if the plans change at any point.

4 RESULTS

4.1 On-site Existing Habitats and Condition Assessment

4.1.1 The baseline habitat types, and their assessed condition are summarised in Table 1 and illustrated on the Habitat Plan in Appendix B.

4.1.2 Habitats within the Site have been assessed for strategic significance in line with the Statutory Biodiversity Metric guidance. The Lancashire 'Local Habitat Map' was reviewed, and the Site does not fall within an Area of Particular Importance for Biodiversity including locally designated sites, Biological Heritage Sites and mapped irreplaceable habitats. The Site lies in a typical urban area and was assigned a low strategic significance.

Table 1: Baseline Habitats and Condition Assessment

Parcel Ref(s)	Habitat Code	Area (ha) / Length (km)	Lost (ha / km)	Condition	Condition Justification
G1 & G2	g4 – Modified grassland	0.2335	0.1298	Poor	<p>The Site supports areas of modified grassland associated with maintained lawns. The sward is species-poor, typically supporting fewer than six species per m², dominated by annual meadow-grass (<i>Poa annua</i>), white clover (<i>Trifolium repens</i>), daisy (<i>Bellis perennis</i>), creeping buttercup (<i>Ranunculus repens</i>), and broadleaved plantain (<i>Plantago major</i>).</p> <p>The grassland is subject to frequent mowing, resulting in a uniform and short sward with minimal structural diversity. Areas of bare ground (>10%) are absent.</p> <p>The habitat therefore fails to meet Condition Criteria A (vegetation composition), B (sward height and structure) and E (bare ground cover). Only 4 of 7 criteria were met overall and the habitat fails the essential criterion (A), and is assigned an overall condition score of 'Poor'.</p> <p>Current proposals show that all grassland within the Site will be lost to development.</p>

P1	Pond	0.0253	0	Moderate	<p>The on-site waterbody (P1) comprises a small, hard-engineered feature fed by a constant inflow from a north-western pipe, with steep stone and rock-armoured margins. The pond supports a modest assemblage of aquatic and marginal vegetation including bulrush <i>Typha</i> sp., water-lilies <i>Nymphaea</i> spp., pondweed <i>Potamogeton</i> spp. and other submerged/emergent species which together cover more than 50% of the shallow water area, with the surface largely free from excessive duckweed <i>Lemna</i> spp. or filamentous algae. Surrounding the pond, scattered ruderals and ferns such as herb Robert <i>Geranium robertianum</i>, nettle <i>Urtica dioica</i>, dock <i>Rumex</i> spp. and hart's-tongue fern <i>Asplenium scolopendrium</i> occur in crevices between large rocks, while shading from adjacent trees and scrub is less than 50%. No non-native invasive plant or animal species were recorded and there is no evidence of artificial fish stocking.</p> <p>However, the feature is tightly enclosed by hardstanding and rock armour, with no continuous 10 m buffer of semi-natural habitat, and is artificially connected to the surrounding drainage network, with water levels controlled by pipe inflow and lacking a natural pattern of seasonal fluctuation. The habitat therefore fails to meet Condition Criteria B (semi-natural habitat buffer), D (absence of artificial connections) and E (natural hydrological regime), although it meets Criteria A, C, F, G, H and I. Six of nine criteria were met overall and therefore this habitat has been assigned a moderate condition.</p> <p>The pond is fully retained.</p>
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Eph1	Ruderal / Ephemeral	0.0235	0	Poor	<p>The Site supports a very small area of ephemeral vegetation developed over artificial hardcore at the southern end of the car park. The substrate comprises compacted aggregate with a thin veneer of soil and moss, supporting a scattered assemblage of short-lived ruderal and pioneer species including forget-me-not <i>Myosotis</i> spp., herb Robert, shepherd's purse <i>Capsella bursa-pastoris</i>, couch grass <i>Elymus repens</i> and willowherb <i>Epilobium</i> spp. Vegetation cover is patchy and low-growing, with extensive areas of exposed hardcore between plants.</p> <p>The habitat is structurally simple, lacking distinct layers or features such as taller herbs, scrub patches or tussocky grassland, and offers limited variation in microhabitats for invertebrates or other fauna. Floristic diversity is low and the sward contains few nectar- or pollen-rich species likely to provide significant resources for wildlife through the year. No invasive non-native plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded.</p> <p>The habitat therefore fails to meet Condition Criteria A (vegetation structure) and B (plant species beneficial for wildlife), although it meets Criterion C (absence of invasive non-native species). Only 1 of 3 criteria was met overall and, for the purposes of the biodiversity metric, the ephemeral vegetation over hardcore is assigned an overall condition score of 'Poor'.</p>
H1	h2b Ornamental / non-native hedgerow	0.104	0	Poor	<p>Ornamental hedges are automatically assigned a poor condition.</p>

T1 – T5	Urban Tree	0.0204	0.0204	Moderate	<p>Trees T1–T5 comprise young native silver birch <i>Betula pendula</i> associated with ornamental planting along the access route. They are relatively small, with simple crowns and no obvious cavities, deadwood or substantial ivy cover, but generally display good vigour and form. There is no evidence of significant damage, pruning or other adverse management, and canopies retain more than 75% of the expected cover for their age and height class. The trees oversail vegetation beneath by more than 20% of their canopy area. For the purposes of the biodiversity metric, T1–T5 meet Condition Criteria A (native species), B (canopy continuity), D (good physiological/structural condition, limited adverse management) and F (oversailing vegetation), but fail Criteria C (maturity) and E (presence of ecological niches). With four out of six criteria met, these trees are assigned an overall condition score of 'Moderate'.</p>
T6 – T8	Urban Tree	0.0122	0	Poor	<p>Trees T6–T8 comprise young ornamental conifers (including spruce <i>Picea</i> sp. and Leyland cypress × <i>Cuprocyparis leylandii</i> planted within formal landscaping. They are non-native, relatively small and lack structural or age-related features such as cavities, loose bark or deadwood that would provide natural ecological niches. Canopies are broadly full for age and height, with no strong evidence of damage, decline or intensive pruning, and as individual trees they automatically satisfy the canopy continuity criterion. However, they do not oversail vegetation beneath by more than 20% of their canopy area. Accordingly, T6–T8 meet Condition Criteria B (canopy continuity) and D (good physiological/structural condition), but fail Criteria A (native species), C (maturity), E (ecological niches) and F (oversailing vegetation). With only two out of six criteria met overall, these trees are assigned a condition score of 'Poor' within the biodiversity metric.</p>

4.2 Habitat Retention & Loss

4.2.1 The proposed layout results in the complete loss of the on-site modified grassland, together with removal of T1-T5. The remaining habitats within the red line boundary will be retained as per the proposals.

4.3 On-site Post-intervention Habitat Creation and Enhancement

4.3.1 The proposed habitat plans are illustrated in Appendix C. Table 2 below describes the habitats proposed.

Table 2: On-site Post-intervention Habitat Creation and Enhancement

Habitat	Condition	Area (ha) / Length (km)	Description / Justification
Developed land; sealed surface	N/A – Other	0.1348	The modified grassland and the loss of T1 – T5 will be replaced with hardstanding.
Urban Tree	Poor	0.0204	It is recommended that the trees which are lost to the development are either relocated or replaced with similar stock elsewhere within the red line boundary.
Modified grassland	Good	0.1037	Enhancement of retained modified grassland from Poor to Good condition by relaxing regular mowing, allowing a more structurally diverse sward to develop and over-seeding with an appropriate native wildflower and grass mix, managed in accordance with the agreed habitat management prescriptions and secured for a minimum of 30 years.

4.4 Biodiversity Unit Calculations

- 4.4.1 The baseline score has been calculated as 0.93 habitat units and 0.10 hedgerow units. Subsequently, a post-development scenario has been calculated from the proposed plans provided and will result in an on-site post-intervention score of 0.78 habitat units and 0.10 hedgerow units. Thus, the proposed development alone would result in an overall loss of -0.14 habitat units (-15.54% net loss) and a ‘no net loss’ of hedgerow units (+0% net gain).
- 4.4.2 For the purposes of the Statutory Biodiversity Metric, the baseline habitat area (1.92 ha) is marginally larger than the planning Site area (c. 1.89 ha) because the metric maps includes the projected canopy area of individual trees, whereas the site area used elsewhere in this report refers only to the underlying land parcel within the red line boundary.

Table 3: Quantitative Assessment of Biodiversity Impact

Factor	Habitats (ha)	Hedgerows (km)
Total on-site area / length (baseline)	1.92	0.10
Total on-site units (baseline)	0.93	0.10

Total on-site baseline area retained	1.67	0.10
Total on-site baseline units retained	0.30	0.10
Total on-site area proposed for enhancement	0.10	0.00
Total on-site baseline units proposed for enhancement	0.20	0.00
Total on-site baseline area / length lost	0.16	0.00
Total on-site baseline units lost	0.43	0.00
Net Project Units	-0.14	0.00
Total project % change	-15.54%	0%

4.5 Trading Summary

4.5.1 The loss of the trees (medium distinctiveness habitat) and modified grassland (low distinctiveness habitat) mean that the trading rules have not been satisfied in full, and additional measures will be required to address this shortfall in order to achieve full compliance.



5 CONCLUSIONS AND RECOMMENDATIONS

5.1 Overview

- 5.1.1 Biodiversity Net Gain calculations, using the Statutory Biodiversity Metric, have been undertaken for the proposed development at Carr Hall, Whalley Road. Baseline habitat calculations have been informed by a UKHab survey and condition assessment in November 2025. Post development habitats have been illustrated in the Proposed Habitat Plan in Appendix C.
- 5.1.2 A unit loss of -0.14 habitat units (-15.54% net loss) and a 'no net loss' in hedgerow units was identified following the completion of the baseline and post intervention calculations.
- 5.1.3 At present, the proposals do not demonstrate a measurable 10% biodiversity net gain in line with Chapter 15, paragraph 180 of the NPPF, the Environment Act, 2021.
- 5.1.4 To meet the statutory 10% net gain requirement an additional 0.24 habitat units and 0.01 hedgerow units are required.

5.2 Addressing the biodiversity loss

- 5.2.1 Based on the Statutory Biodiversity Metric, implementation of the on-site mitigation and enhancement measures described above (including replacement tree planting and habitat enhancement) will not, on their own, achieve a 10% net gain in biodiversity, and a small residual shortfall in habitat and hedgerow units will remain. Given the constrained, heavily developed industrial setting of the Site, there is limited physical space available for additional on-site habitat creation beyond enhancement of retained grassland and replacement tree planting. The BNG strategy for the Site will therefore comprise a hybrid approach:
 - On-site delivery through replacement tree planting and enhancement of retained grassland which should be secured by the approved landscape scheme and captured in the Biodiversity Net Gain Plan; and
 - Off-site delivery of the remaining biodiversity units required to achieve at least 10% net gain, via the purchase of off-site biodiversity units from an appropriate habitat bank or other off-site scheme agreed with Ribble Valley Borough Council, with management secured for a minimum of 30 years.
- 5.2.2 Together, these measures will ensure that the development meets the mandatory Biodiversity Net Gain requirement in accordance with the Environment Act 2021 and relevant local planning policy.
- 5.2.3 The delivery and long-term management of newly created and enhanced habitats should be secured through a Landscape and Ecological Management Plan (LEMP) and/or appropriate planning conditions, in accordance with national guidance and the Environment Act 2021. This will be secured for 30 years by condition/obligation, with a LEMP defining success criteria, monitoring (e.g., years 2, 5, 10, 20, 30), and remedial triggers.
- 5.2.4 Subject to the implementation of the above recommendations and securing of an appropriate Biodiversity Net Gain delivery mechanism (on- or off-site), the proposed development is considered capable of achieving compliance with Paragraph 180 of the NPPF and the Environment Act 2021 statutory BNG requirement.



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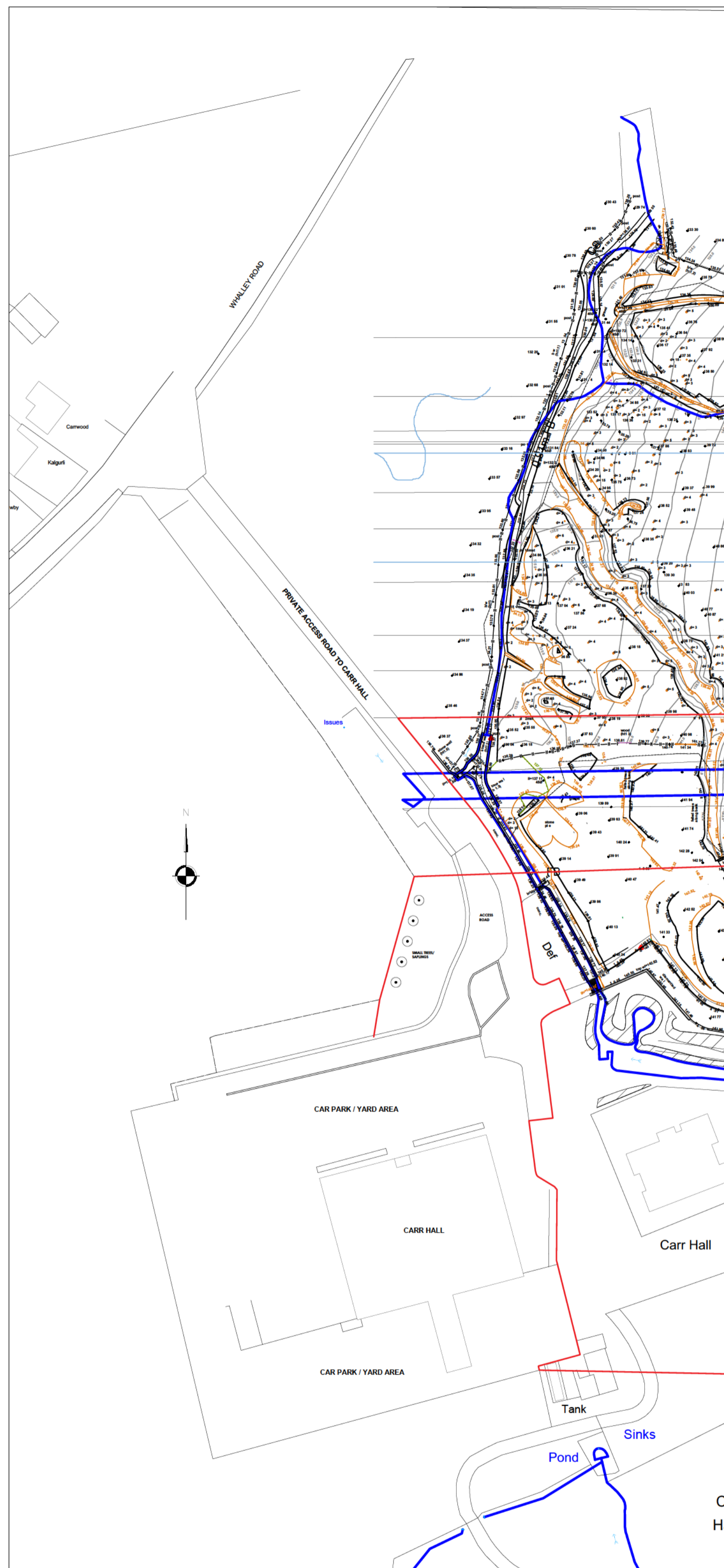
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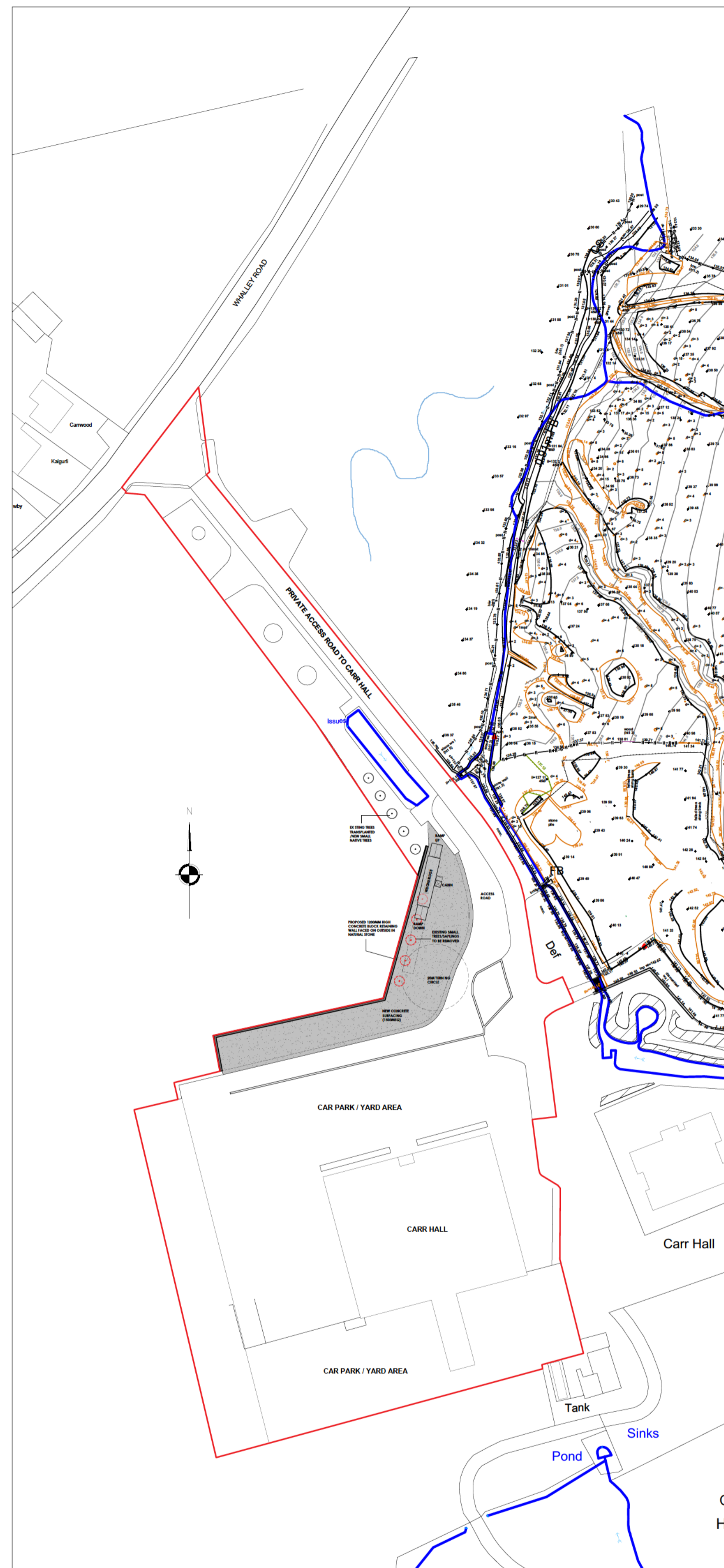
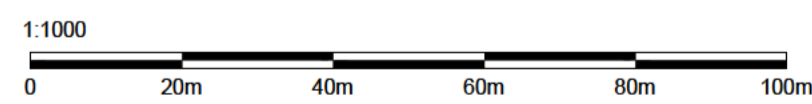
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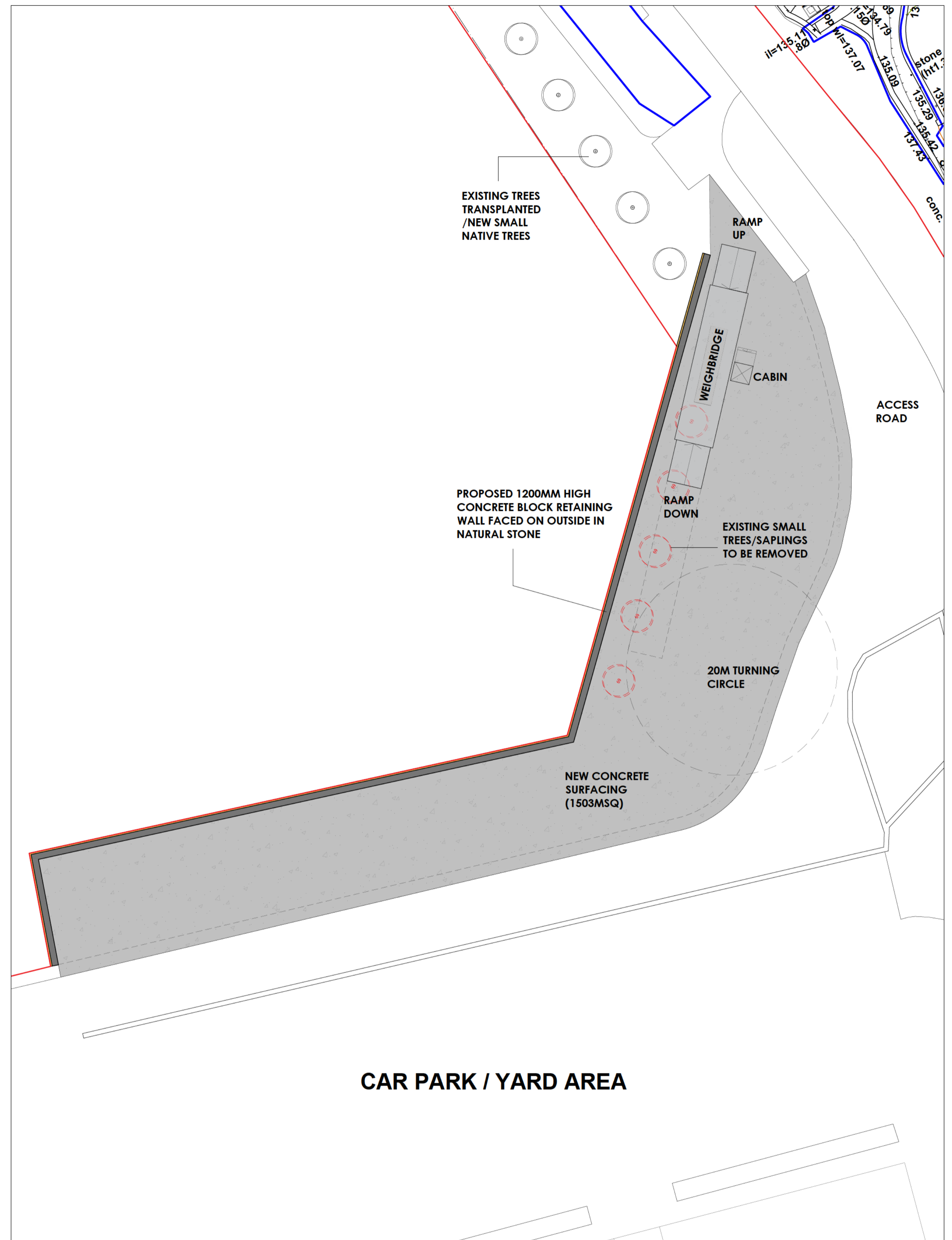
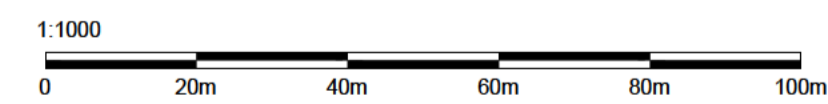
APPENDIX A – Proposed Plan



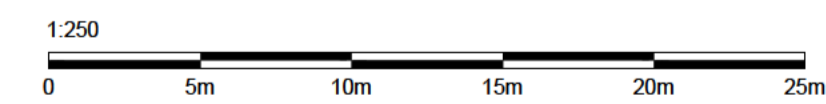
EXISTING SITE PLAN 1.1000 @ A1



PROPOSED SITE PLAN 1.1000 @ A1



PROPOSED SITE PLAN 1.250 @ A1












APPENDIX B – Baseline Habitat Plan



Legend



-  Red Line Boundary
-  Developed land; sealed surface
-  Modified grassland
-  Ponds (non-priority habitat)
-  Ruderal/Ephemeral
-  Non-native and ornamental hedgerow
-  Existing Small Urban Tree



Clarendon Road, Audenshaw,
Manchester, M34 5PP

i 07539719916
e henry.gunning@evelynecology.com
w evelynecology.com

Project	Carr Hall, Whalley Road, Wilpshire	Date	09/12/2025	Drawing No	CHWR-EVE-DR-ECO-01
Drawing Title	Baseline Habitat Plan	Scale	As shown	Revision	01
Client	Bramley - Pate + Partners	Drawn	KK	Checked	HG




APPENDIX C – Proposed Habitats Plan



Legend



-  Red Line Boundary
-  Developed land; sealed surface
-  Modified grassland
-  Ponds (non-priority habitat)
-  Ruderal/Ephemeral
-  Non-native and ornamental hedgerow
-  Proposed Small Urban Tree
-  Retained Small Urban Tree
-  Lost Urban Tree



Project	Carr Hall, Whalley Road, Wilshire	Date	09/12/2025	Drawing No	CHWR-EVE-DR-ECO-02
Drawing Title	Proposed Habitat Plan	Scale	As shown	Revision	01
Client	Bramley - Pate + Partners	Drawn	KK	Checked	HG