SURREY COUNTY COUNCIL

LOCAL COMMITTEE (REIGATE & BANSTEAD)

DATE: 16 SEPTEMBER 2013

LEAD DAVE TAYLOR – PROJECT ENGINEER

OFFICER:

SUBJECT: PROPOSED HIGHWAY IMPROVEMENTS – LANGSHOTT,

HORLEY

DIVISION: HORLEY EAST

SUMMARY OF ISSUE:

Key issue:

To deliver the bus route, as set out in the Horley Masterplan. Surrey County Council have commissioned independent transport consultants to undertake a study considering access options for the Horley North East Sector development, known as and referred to in this report as 'the Acres'. The study considers options for both onsite and off-site bus infrastructure and assesses these against a range of criteria including, accessibility, bus operations, highway safety and feasibility.

The purpose of this officer report is to advise the Local Committee of the outcomes of the study and agree the necessary highway works, including associated traffic regulation orders.

Summary:

'The Acres' comprises 710 dwellings, a primary school, a community centre and a 60 unit Extra Care Facility. Phase 1 is complete and fully occupied with Phase 2 and Phase 3 under construction and due for completion in 2015.

Outline Planning Permission (P/04/01178/OUT) for the Acres was granted in 2006. As part of the Section 106 Agreement, Surrey County Council has an obligation to deliver a bus service linking the development to Horley Town Centre and the West Sussex County boundary, partially funded by the developer.

As part of the Horley Masterplan an indicative bus route was shown to enter the development via Orchard Drive and exit the site via a bus only access onto Langshott. This was examined by an independent Planning Inspector as part of Reigate and Banstead Borough Council's Local Plan First Alteration on 2001, which was adopted in 2005.

The Outline Planning Permission for the Acres incorporated this extension of the Fastway bus route 20. The route was secured in the Section 106 Agreement and included in subsequent reserved matters applications.

Currently the site is only partially served by the Fastway Route 20, operated by Metrobus, under contract to Surrey County Council. The bus enters the development as far as the roundabout on Orchard Drive, where it turns around. It should be noted that this was only ever envisaged to be a temporary arrangement until such time as the bus service could safely enter the site.

There has been some local concern, particularly amongst Langshott residents, as to how a bus can safely exit the development onto Langshott. Langshott is a narrow country lane generally between 4 and 5 metres wide, the geometry and reduced maintenance has led to questions over its general suitability as a bus route.

The WSP study has analysed 5 options for the bus route to serve the Acres development:

- 1. Retain existing provision
- 2. Bus enters and exits the development via Orchard Drive
 - (a) Bus uses a circular route within the development
 - (b) Bus turns in a turning area
- 3. Bus enters the development via Orchard Drive and exits via Langshott
 - (a) No works to Langshott
 - (b) Reconstruction of carriageway and provision of passing places
 - (c) Reconstruction of carriageway, provision of kerbed footway and passing places.
 - (d) Widening of Langshott, including provision of kerbed footway

Each of the options has been scored enabling them to be ranked in order of preference against a set criterion, please refer to Annex 1. Each criterion has been weighted. The weighting has been primarily based on Surrey County Council's Local Transport Plan objectives.

The preferred option is for the bus to exit the Acres via Langshott, in accordance with the Horley Masterplan and the planning permission for the site, with Langshott being upgraded with the provision of passing places and a footway.

RECOMMENDATIONS:

The Local Committee (Reigate & Banstead) is asked to agree that:

- (i) Authority is given to support the scheme to reconstruct Langshott and provide passing places, and a footway, to facilitate the bus service, subject to the identification of available funding.
- (ii) Authorise the advertisement and introduction of a Traffic Regulation Order to reduce the speed limit to 30mph.
- (iii) Authorise the advertisement and introduction of a Traffic Regulation Order for the prohibition and restriction of waiting, loading and unloading on Langshott, to avoid vehicles causing an obstruction to the bus route.
- (iv) Authorise the advertisement and introduction of a Traffic Regulation Order for the "Bus Only Access" from The Acres onto Langshott.
- (v) Agree that the consideration and resolution of any representations received as a result of advertising the above Traffic Regulation Order be delegated to the South East Surrey Area Team Manager in consultation with Chairman of the Local Committee and local elected Members.

REASONS FOR RECOMMENDATIONS:

- (i) To facilitate the bus route, as approved as part of the Horley Masterplan proposals and planning permission for the Acres.
- (ii) To meet the aims of the Horley Masterplan and comply with the Outline Planning Permission for the site and legal requirements of the Section 106 Agreement.
- (iii) To provide safe access for all highway users in accordance with Surrey County Councils Local Transport Plan and national and local policy guidance.

1. INTRODUCTION AND BACKGROUND:

- 1.1 Outline Planning Permission (P/04/01178/OUT) for the North East Sector, known as the Acres, was granted in 2006. The Acres comprises 710 dwellings, a primary school, a community centre and a 60 unit Extra Care Facility. Phase 1 is complete and fully occupied with Phase 2 and Phase 3 under construction and due for completion in 2015.
- 1.2 An integral part of the North East Sector development is the Fastway Bus Service, a high quality service linking the Acres to Horley Town Centre, Gatwick and Crawley. The bus service operates seven days a week between 05:00 and 23:00, with up to 3 buses an hour.
- 1.3 Considerable investment has already been made by Surrey County Council in forward funding the off-site highway works that were required to facilitate the bus route, for example Longbridge Roundabout and Massetts Road. This has been supplemented with Public Transport monies to subsidise the bus running costs. Much of this is to be offset by significant Developer funding and forms the fundamental basis of achieving a 20% modal shift in the am peak hour vehicle traffic to sustainable modes of transport, a principle that underpins the Horley Masterplan.
- 1.4 The bus route was considered as part of the Horley Masterplan, with an indicative route shown to enter the development via Orchard Drive and exit the site via a bus only access onto Langshott. The Horley Masterplan formed part of the First Alteration to the Borough Local Plan. Work began on this in 1995, with the consultation draft published in 1998 and the Initial Deposit Draft and Revised Deposit Draft in 2000. A public inquiry was held in early 2001. The Inspector's Report in 2001 supported the principles of the Horley Masterplan and of the two main housing allocations in Horley. However, the inspector recommended carrying out further work on the flooding and transport models. Further studies were completed and independently evaluated and the proposed modifications were placed on deposit in 2004. Full Council on the 17 February 2005 resolved to adopt the First Alteration, which came into effect on 7 April 2005 when the Notice of Adoption was published.
- 1.5 The Outline Planning Permission for the Acres incorporated this extension of the Fastway bus route 20. The route was secured in the Section 106 Agreement and included in subsequent reserved matters applications.

- 1.6 Langshott is a public highway and forms part of the local infrastructure. It is a metalled pavement with only a short section of footway. Pedestrians, cyclists and vehicles mostly share the pavement. There is limited street lighting, drainage and the carriageway surface is in poor repair. It appears that there is little or no foundation beneath the wearing course. There is no signed speed limit along Langshott, so in the absence of street lighting and any repeaters the national speed limit would apply. However, it is understood that a 40mph speed limit is in force.
- 1.7 Langshott is a narrow country lane, generally between 4 and 5 metres wide. The current semi-rural nature of Langshott, the geometry and reduced maintenance has led to some local concern over its general suitability as a bus route.
- 1.8 In response to these issues, Surrey County Council commissioned an independent transport consultation to undertake a study considering the options of the bus route serving the Acres. The results of the report are outlined below.

2. ANALYSIS:

2.1 Transport consultants WSP have undertaken a study of the possible options to help us deliver the bus route (attached as **Annex 4**):

2.2 Option 1 – Retain Existing Provision

The bus currently enters the Acres development as far as the roundabout on Orchard Drive, where it turns around. The bus stop is located on the west side of Orchard Drive in advance of the roundabout.

- 2.3 Option 2 Bus enters and exits the development via Orchard Drive
 This option requires the bus to turn within the development. Two alternatives have been considered:
 - (a) Bus uses a circular route within the development A circular route has been identified within the development via Blacksmith Road.
 - (b) Bus turns in a turning area An area to turn the bus has been identified in the vicinity of the neighbourhood centre.

Turning using a three point turn has been ruled out as this would require the bus to reverse. The bus operator, Metrobus, and Surrey Count Council's Travel and Transport Group have both indicated that this would not be acceptable.

2.4 Option 3 – Bus enters the development via Orchard Drive and Exits via Langshott

This option was considered as part of the original Masterplan and forms part of the Planning Permission for the Acres development. The report considers what works would be required to Langshott to facilitate the bus between the exit from the development and the junction with Orchard Drive/Wheatfield Way, a length of approximately 500 metres (please refer to Annex 3).

(a) - Do nothing

The bus would enter the development via Orchard Drive and exit via Langshott. No works would be undertaken to Langshott.

(b) – Provision of passing places between the bus gate and Wheatfield Way

The bus would follow a clockwise route, entering the development via Orchard Drive and exiting via Langshott. The carriageway would be reconstructed to the existing width. Flush kerbs would be provided along each edge of the carriageway to provide restraint to the construction. Passing places would be provided at appropriate locations. These would be arranged such that westbound buses had priority.

(c) – Kerbed footway on one side of the carriageway with passing places between the bus gate and Wheatfield Way, including horizontal deflection traffic calming

The bus would enter the development via Orchard Drive and exit via Langshott. This option would involve reconstruction of the carriageway and the provision of passing places, with the addition of a 2.0 metre wide footway. The footway would be located in the southern verge between Orchard Drive and Easter Barn to maximise the use of the existing footway. The footway would then be provided in the northern verge up to the location of the bus gate. This would place the carriageway as far as possible from the adjacent properties and not impact on the existing parking area.

(d) – Widening Langshott to 5.5m wide with 2.0m wide footway The bus would enter the development via Orchard Drive and exit via

Langshott. This option would involve widening Langshott to 5.5 meters with a 2.0 meter footway. The westbound carriageway would be 3.0 meters wide to cater for buses. As with option c, a footway would be provided in the southern verge between Orchard Drive and Easter Barn and then in the northern verge up to the location of the bus gate. Horizontal traffic calming could also be provided to give priority to westbound traffic.

- 2.5 It is recommended that parking restrictions be implemented along the length of Langshott between the bus gate and Wheatfield Way. This will prohibit parking on the carriageway that would impede the passage of buses. Parking restrictions could take the form of either double yellow lines along the required lengths or an area wide parking restriction.
- 2.6 In all cases a bus gate would be required at the exit point from the development onto Langshott, in order to prevent private vehicles accessing/egressing the development. A bus gate would require signage and a Traffic Regulation Order to prohibit unauthorised usage. Without enforcement measures, the fact that the bus gate would be a relatively short length mean that it would be likely to be abused. Physical enforcement measures could take the form of CCTV, rising bollards, lifting barrier or deterrent paving.

3. OPTIONS:

- 3.1 Please refer to Annex 4 (the bus route report) for the detailed assessment of each option.
- 3.2 Each of the options has been scored enabling them to be ranked in order of preference against a set criterion (please refer to Annex 2). Each criterion has been weighted. The weighting has been primarily based on Surrey County Council's Local Transport Plan Objectives:
 - Effective transport: To facilitate end-to-end journeys for residents, business and visitors by maintaining the road network, delivering public transport services and, where appropriate, providing enhancements.
 - Reliable transport: To improve the journey time reliability of travel in Surrey.
 - Safe transport: To improve road safety and the security of the travelling public in Surrey.
 - Sustainable transport: To provide an integrated transport system that protects the environment, keeps people healthy and provides for lower carbon transport choices.
- 3.3 From the evaluation of the different alternatives, the preferred option is 3c. Option 3c has the benefits of providing good access to the bus service in compliance with the Horley Masterplan and Planning Permission for the site. In terms of upgrading Langshott it is considered that full widening of the lane is not appropriate given the level of traffic currently using Langshott and the number of buses proposed. However the current condition requires it to be reconstructed and passing places be provided, to allow vehicles to pass each other. Although option 3c is a higher cost solution than alternative 3b, it has significant additional benefits to pedestrians through the provision of the footway, which will link into the existing rights of ways and pedestrian access points on Langshott.
- 3.4 As part of the works to Langshott, Surrey County Council will need to look at the junction of Orchard Drive/Wheatfield Way/Langshott in order to facilitate buses turning left into Wheatfield Way. Some initial work has been undertaken as part of the bus route study, in response to concerns regarding safety. The issue primarily relates to the through visibility that is provided to vehicles travelling in the north-south direction, which seemingly indicates priority at this junction. Further work is required, including tracking and vehicle counts, before a recommendation can be made. This will be considered as part of the detailed design works for Langshott.

4. CONSULTATIONS:

- 4.1 The Horley Masterplan was the subject of a Public Inquiry and now forms part of the Borough Councils Supplementary Planning Guidance. The bus route study has been through the necessary internal consultation procedures.
- 4.2 Transportation Development Planning has liaised with Traffic Systems, East Area Highways, Travel and Transport Group, Safety Engineering Team, the developer of the North East Sector (Barratts) and the Borough Council.

- 4.3 Surrey Police has been consulted and their comments have been incorporated into the bus route study.
- 4.4 Surrey County Council has attended meetings with both residents of Langshott and residents from the Acres to listen to their concerns, which have been considered as part of the bus route study. It is Surrey County Council's intention to make the bus route study available to residents and arrange a further meeting to explain the findings and outcomes

5. FINANCIAL AND VALUE FOR MONEY IMPLICATIONS:

- 5.1 The costs associated with the scheme will not be known exactly until we have assessed the existing construction with the use of trial holes and core testing and undertaken surveys of the existing stats. This will be undertaken as part of the detailed design work.
- 5.2 The costs included in this report are initial estimates. There will also be a need to provide for design costs at around 6% of the build cost, plus officer time in producing and implementing the scheme. That could all amount to an additional 30%.
- 5.3 The cost of the scheme is to be met through developer related funding.
- 5.4 It is essential that the bus route is accessible to all residents of the Acres and serves key facilities, such as the community centre and school. The bus service is currently partially funded by the developer, however it is envisaged that in the long term this will become a commercially viable route. The County Council has significant pressure on the Supported Bus Service budget. Increasing bus patronage is therefore essential to ensure that reliance on public subsidy is minimised. Route 3c provides good access to the bus service, with all 710 households within 400m of a bus stop in accordance with the outline Planning Permission.

6. EQUALITIES AND DIVERSITY IMPLICATIONS:

- 6.1 The Public Sector Equality Duty requires the Council to have due regards to the need to:
 - eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
 - foster good relations between people who share a protected characteristic and those who do not share it.
- 6.2 The bus service needs to serve all residents within the Acres development including residents accessing employment and education, along with older people, people with disabilities and those on lower incomes, who may be more reliant on public transport. It is therefore imperative that all households are within 400m of a bus stop, in accordance with the outline Planning Permission. Option 3c will deliver this.
- 6.3 As part of the detail design work, an Equality Impact Assessment will be carried out and maintained/updated throughout the project.

7. LOCALISM:

7.1 A collection of residents from the Acres have expressed concerns regarding the bus turning within the development and wish to see the bus to enter the site via Orchard Drive and exit via Langshott, as per the outline Planning Permission. A petition has been started, however has not been formally submitted to Surrey County Council or Reigate and Banstead Borough Council. The developer has commented as follows:

"We have given the report due consideration and Barratt Southern Counties preferred choice is Option 3. This will ensure we are compliant with our approved development layout and will be in line with the expectation of our purchases"

- 7.2 The majority of properties on Brookfield Drive and Blacksmith Road are now either occupied or sold. As such, any alterations to the highway layout, including on-street car parking arrangements, is likely to be met with heavy resistance from both residents and the developer. As such, options 1 or 2 are unlikely to be supported.
- 7.3 A collection of Langshott residents have expressed concerns regarding the general suitability of Langshott as a bus route, in particular pedestrian safety. A petition has also been started on Surrey County Council's website against the widening of Langshott.
- 7.4 Planning has already been given for the bus to leave the development using Langshott. What now needs to be achieved is the provision of a safe route for all users of the highway, whilst minimising the effect of these works on local residents. It is considered that option 3c offers a balanced approach, with the maximum overall benefits.

8. OTHER IMPLICATIONS:

Area assessed:	Direct Implications:
Crime and Disorder	Set out below
Sustainability (including Climate	Set out below.
Change and Carbon Emissions)	
Corporate Parenting/Looked After	No significant implications arising
Children	from this report.
Safeguarding responsibilities for	No significant implications arising
vulnerable children and adults	from this report.
Public Health	No significant implications arising
	from this report.

8.1 Crime and Disorder implications

Option 3c should have no impact on crime and disorder. In accordance with Surrey Police's comments, the feasibility of street lighting will be considered as part of the detailed design.

8.2 Sustainability implications

The Fastway buses, operated by Metrobus, date from 2009 and have Euro 4 engines for which the emissions are well under that required for the London LEZ. These are to be replaced with new buses which have Euro 5 engines later this year.

Increasing bus patronage will contribute to a key objective of the Horley Masterplan: to achieve a 20% modal shift in the am peak hour vehicle traffic to sustainable modes of transport. The greater the use of the bus service, the less impact the development will have on the local highway network. It is therefore essential that a suitable route is provided that is accessible to all residents of the Acres development.

9. CONCLUSION AND RECOMMENDATIONS:

- 9.1 The County Council is legally bound to provide the bus route, in accordance with the Planning Permission for the North East Sector and the associated Section 106 Agreement. This has been through the due process, but as an outcome it is necessary to undertake associated civil engineering works to facilitate the bus and provide a safe environment.
- 9.2 The independent report highlights the various options for the improvements to Langshott. A "do nothing" scenario is not a realistic option. Langshott is in need of structural repair and improvement in order to provide bus access. Safety for all users of the public highway must be maintained.
- 9.3 The recommendation is made after considering the various options and comparing them against a set criterion. Whilst all the options have various pros and cons, it is clear from a transportation perspective that option 3c will provide the greatest benefit in terms of sustainability, safety and operations. It will also minimise the financial risk to the County Council in terms of ongoing Local Bus Revenue support.
- 9.4 Support is requested for officers to undertake detailed design works in order to implement the scheme prior to completion of the North East Sector.
- 9.5 Authorisation is also sought for the advertisement and introduction of all necessary Traffic Regulation Orders associated with the proposed scheme.

10. WHAT HAPPENS NEXT:

- 10.1 The Acres development is not due for completion till 2015. In terms of site safety the Developers have confirmed that it would be sensible to avoid having the bus running through the site, until practical completion.
- 10.2 Surrey County Council is aiming to carry out detailed design works, in the view of implementing the scheme in 2014/15.
- 10.3 Surrey County Council will continue to liaise with local residents as the scheme progresses.

Contact Officer: Dave Taylor – Project Engineer, 020 8541 9310

Consulted:

John Lawlor – Surrey County Council, Area Highway Manager
Paul Millin – Surrey County Council, Group Manager, Travel and Transport
David Ligertwood – Surrey County Council, Travel and Transport Group
Matt Smith – Surrey County Council, Road Safety Engineering Team
Graham Bath – Surrey County Council, Traffic Signals
Christopher Cannon – Surrey Police

Mrs Dorothy Ross-Tomlin – Surrey County Councillor (Horley East)
John Cover - Barratt Southern Counties
Peter Boarder – Reigate and Banstead Borough Council/Surrey County Council

Annexes:

Annex 1 - Bus Corridor Options Assessment Criteria

Annex 2 – Bus Corridor Options Scoring

Annex 3 – Location Plan

Annex 4 - WSP Report - Horley North East Sector Bus Corridor Operations

Sources/background papers:

None

Annex 1 – Bus Corridor Options Assessment Criteria

Criteria	or Options: Assessment Criter		ore	Weight	Comment						
Patronage	How many potential passengers are	3	99 - 100% or more of people (1,687 -	15%							
i alionage	within 400m of a bus stop?*	3	1,704 people)	15%	 Increasing bus patronage will contribute to a key objective of the Horley Master Plan - to achieve a 20% modal shift of peak hour traffic onto alternative 						
	*Assumption of 2.4 persons per average household. Therefore 710 households equates to 1,704	2	50% - 99% of people (852-1,686 people)		 modes of transport. The greater the use of bus services the less impact there will be on the local highway network. 						
	people.		Less than 50% of people (0 – 851 people)		 Increasing bus patronage will assist in making the bus service run on a commercial basis therefore requiring less or no public subsidy. 						
Accessibility	Accessibility for residents: Are all households within 400m of a bus stop?	3	99 - 100% of households (703-710 households)	10%	 All households should be no more than 400m from a bus stop to ensure adequate accessibility. This is a planning condition of the outline planning 						
	Assumption 710 households.	2	50% - 99% of households (355 – 702 households)		 permission. Surrey County Council has a statutory duty to consider the impact on equalities. People on lower incomes, those with 						
		1	Less than 50% of households (0 – 354 households)		disabilities and the elderly for example tend to be more reliant on public transport.						
	Access to key facilities: Are all key community facilities in the	3	Yes	5%	Both residents of the Acres as well as the wider population in Horley will use key community facilities, such as the school,						
	neighbourhood within 400m of a bus stop?	2 Partly			community centre and local shops. These facilities should be no more than 400m from a bus stop.						
		1	No								
Effect on bus operations	What is the effect on bus operations?		Most advantages	10%	A bus service needs to be reliable along the entire length of its route.						
		2	Some advantages/disadvantages		 Key factors that will affect bus operations include: the provision of layovers/terminus points, adequate turning, geometry etc. 						
		1	Least advantages								
Landscape impact	What impact is there upon the existing landscape?	3	No change to existing landscape	5%	What impact is there upon the existing landscape including trees, hedges, verges, open space, ditches and the general						
		2	Some changes to existing landscape		streetscene?						

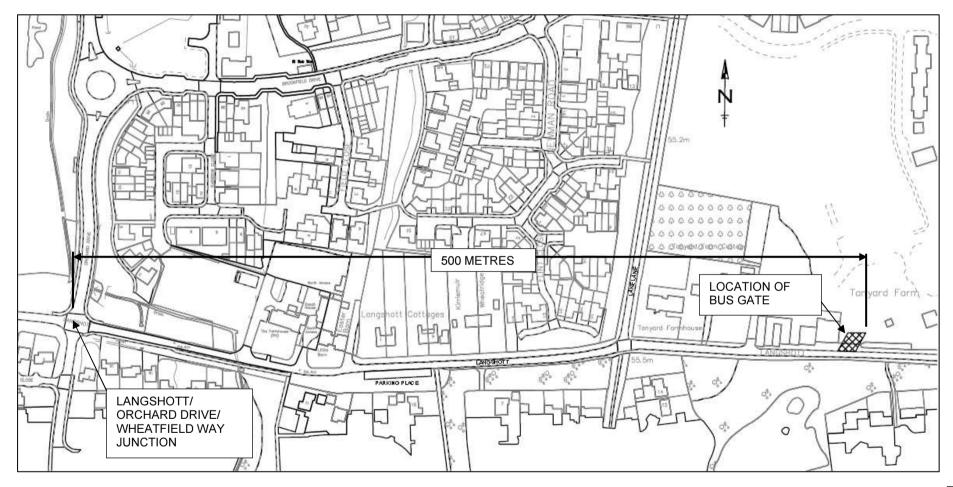
			1	Most changes to existing landscape						
	Highway safety	What impact will there be on highway safety	3	Most advantages	15%	What impact will there be on the safety of users of the public highway, particularly more vulnerable users such as pedestrians				
		Ingiliary balloty	2	Some advantages/disadvantages		and cyclists?				
			1	Least advantages						
	Technical construction	What is the technical feasibility of construction	3	Highly feasible	15%	What works will be required to facilitate the bus e.g. widening of carriageway, carriageway reconstruction, drainage improvements				
	feasibility			Less feasible		etc and how feasible are these?				
			1	Not feasible						
	Residential amenity	How will the proposal impact on exiting properties?		Most advantages	5%	How will proposals affect access and parking arrangements and the proximity to residential properties?				
Ū		31 41 41	2	Some advantages/disadvantages		and promising to residential properties.				
age			1	Least advantages						
196	Legal feasibility	Are there any legal issues that could impact the proposal	3	No legal impact	15%	Are there any legal issues that need to be considered? For example does it conform to existing permissions, Section 106				
		sould impast the proposal		Limited legal impact		and 38 agreements? Would works fall within the limits of the public highway? Would the option require Traffic Regulations				
				Greatest legal impact		Orders?				
	Cost	What is the estimated cost of the proposal?		£0 - 100,000	5%	What is the estimated cost of the option and how does this compare to the benefits that might be derived?				
				£100,000-£500,000	1	compare to the benefits that might be derived:				
				Above £500,000						

Annex 2- Bus Corridor Options Scoring

	Criteria	Overall Weight	Op	otion 1	Ор	tion 2a	Ор	tion 2b	Ор	tion 3a	Ор	tion 3b	Ор	tion 3c	Ор	tion 3d
Theme			Score	Weighted												
Patronage	How many potential passengers are within 400m of a bus stop?	15	1	15	3	45	3	45	3	45	3	45	3	45	3	45
Accessibility	Are all households within 400m of a bus stop?	10	1	10	3	30	3	30	3	30	3	30	3	30	3	30
	Are all key community facilities within 400m of a bus stop?	5	1	5	3	15	3	15	3	15	3	15	3	15	3	15
Effect on bus operations	What is the effect on bus operations?	10	2	20	1	10	2	20	1	10	2	20	2	20	2	20
Landscape impact	What impact is there upon the existing landscape?	5	3	15	3	15	3	15	2	10	2	10	2	10	1	5
Highway safety	What impact will there be on highway safety	15	3	45	2	30	1	15	1	15	1	15	2	30	3	45
Technical construction feasibility	What is the technical feasibility of construction?	15	3	45	1	15	1	15	2	30	2	30	2	30	2	30 :

Residential amenity	How will the proposal impact on exiting properties?	5	3	15	1	5	3	15	1	5	2	10	2	10	2	10∏ 1 0 1 1 4
Legal feasibility	Are there any legal issues that could impact the proposal	15	2	30	1	15	1	15	2	30	3	45	3	45	2	30
Cost	What is the estimated cost of the proposal?	5	3	15	3	15	3	15	3	15	2	10	2	10	1	5
	Total	100	22	215	21	195	23	200	21	205	23	230	24	245	22	235

Annex 3 – Location Plan



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