

# J. & P. Turner

*Corn & Seed Merchants*

Established 1801

Arrow Mills, Kington, Herefordshire. HR5 3DU.

Tel : (01544) 230536

## Historic Buildings Response

APPLICATION NO & SITE ADDRESS: 240969 –

Arrow Mills, Island Terrace, Kington, Herefordshire, HR5 3DU

DESCRIPTION: Proposed single story cafe building at J & P Turner.

APPLICATION TYPE: Planning Permission

Planning Application for the proposed new café at J & P Turner, Kington.

### **Applicant**

J & P Turner  
Arrow Mills  
Kington  
Herefordshire  
HR5 3DU

## Introduction, Purpose

This historic and heritage response has been prepared for a proposed single story café building at J & P Turner. The proposal is to compliment the well-established animal feed merchants and garden centre which has been running since 1801. A café unit on the site to be open during the centres operating hours to provide refreshments to visitors.

This response has been prepared by Simon Turner and Martin Turner who have over 40 and 60 year's experience living and working on the site. Experience and longevity are the reasons J & P Turner has been operating on the same site for over 223 years. At the forefront is preserving and enhancing the site where we live and work.

The proposed café is going to use the old timber shed that had a previous life as an upstairs store room. This was moved by cranes to its current resting place. This will be again moved by cranes in one section to its final resting place across the leat. There is no dismantling involved.

## Response

1. The proposal relates to the dismantling and re-erection of an existing building to a different site to form a café.

The proposal does not involve any dismantling of any structure. The chicken shed is in disrepair and falling over. The old timber shed is being moved with cranes to the site of the chicken shed. It was moved to its current spot by two cranes in 2019. See Appendix 1 to see the moving of the building.

2. The site lies within the Kington Conservation Area and contains 3 listed buildings;  
o UID 1279480 Arrow Lodge Mill included on the statutory list on 26/07/1976  
o UID 1196556 Arrow Lodge included on the statutory list on 07/08/1972  
o UID 1297581 Warehouse at Arrow Lodge included on the statutory list on 26/07/1976

This is correct with the buildings being grade two listed. Appendix 2 shows the listed buildings on site.

3. It is noted that some of the listed buildings appear to be not fully occupied and exhibiting some signs of lack of maintenance. I note the previous applications to convert to residential use which do not appear to have been implemented. I also note the solar panels on UID 1297581 Warehouse at Arrow Lodge and have not been able to locate a planning application nor listed building consent application for those panels.

Appendix 2 shows the listed building map for the site.

Arrow Mill (UID 1279480) is largely not used today except for a micro hydro plant utilising the 19<sup>th</sup> century technology to produce enough electric for the business use. This renewable electric will be used by the café too. The mill leat which powers the hydro runs through the centre of the site next to the proposed café.

Arrow Lodge (UID 1196556) has always been a residence for the Turner family dating back to 1801 which continues today with the 6<sup>th</sup> generation. The 7<sup>th</sup> generation live in the annexe which used to be the old shop and offices.

The Warehouse (UID 1297581) is unused now as the business has a new modern warehouse which was built in 2019. This is predominantly empty.

There have been applications to look at the possibility of residential use but these were never followed up as the business was continuing to operate on the site and we had enough houses for the family.

4. Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, places a statutory duty on the local planning authority to have special regard to the desirability of preserving the building or its setting. This statutory duty has been amended by The Levelling-up and Regeneration Act 2023 section 102 (4) in that in relation to a listed building in England, "preserving" in subsection (2) is to be read as "preserving or enhancing".

J & P Turner will always look after and preserve these buildings with constant maintenance on the structures to avoid them falling into disrepair. The north side of the warehouse roof was renewed in April 2022 as it was causing leaks to the structure. We are always monitoring the buildings to preserve them for the next generation. As have the previous six generations. The business has to be profitable in order to enhance the surroundings with one project at a time.

The site and grounds of J & P Turner are very important. They need to be preserved and enhanced. This is constantly done by J & P Turner with making the site more accessible to all and appealing to customers. The appearance has been improved over the years with a big project completed in 2019 which had planning permission 190449. The retail area inside and out have been greatly improved both aesthetically and accessibly. Appendix 3 shows the site before the need feed store and shop and it's not as appealing as it is now.

5. NPPF in the Glossary defines setting as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral

The listed buildings play an important part in the history of the business and Kington. J & P Turner is the oldest business in Kington dating back to 1801. With the same family running the business throughout. The listed buildings at J & P Turner are completely unaffected by the proposed development.

6. I would refer to paragraph 206 of NPPF which advises that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of assets of the highest significance, grade I and II\* listed buildings, should be wholly exceptional.

The old timber frame is within the curtilage of the site and is not being harmed or lost but enhanced and utilised. We considered this to be a minor scheme as it only involved moving a building already on site so would not have adverse impact on the conservation area or setting of nearby buildings. It is also relevant that the Conservation Officer in 2019 commented "the building is of no great historic or architectural interest". Appendix 4 shows the old, current and proposed location of the timber shed. Its final location being closer to where it originally was. Moving only 19.27m across the leat.

7. In accordance with paragraph 195 of NPPF, I would refer to the guidance prepared by Historic England The Setting of Heritage Assets – Historic Environment Good Practise Advice in Planning Note 3, [HEGPAN 3] in respect of how to assess setting, which should have been utilised in the assessment of the setting of heritage assets.

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

"The old timber building is not of historic or architectural value" as stated by the conservation officer in 2019 when he visited the site. This is not a heritage asset. If it was it would have been listed like the other grade two buildings on site.

8. The "setting of a heritage asset" is defined in the Glossary of the National Planning Policy Framework as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

See above point 7

9. Significance is defined in the Glossary of the National Planning Policy Framework as. "The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting".

Simon Turner and Martin Turner who have over 40 and 60 year's experience living and working on the site. Experience and longevity are the reasons J & P Turner has been operating on the same site for over 223 years. At the forefront is preserving and enhancing the site where we live and work. All the buildings are looked after. The timber shed has been preserved after thoughts to destroy it after Herefordshire council said "is not of historic or architectural value" back in 2019.

10. Historic England The Setting of Heritage Assets – Historic Environment Good Practise Advice in Planning Note 3, [HEGPAN 3] advises 5 steps to be considered when assessing setting.

1. Identify which heritage assets and their setting are affected.
2. Assess whether, how and to what degree these settings make a contribution to the significance of the heritage assets.
3. Assess the effects of the proposed development whether beneficial or harmful on that significance,
4. Explore the way to maximise enhancement or minimise harm
5. Make and document the decision and monitor outcomes.

A historic and heritage statement was prepared for the proposal. In 2019 none of this was brought to our attention as the planning went through for our steel frame building. This is directly next to the listed warehouse. The Levelling-up and Regeneration Act 2023 is now the statutory guidelines but we have always been preserving and enhancing the site J & P Turner is on. We are preserving the buildings by looking after them and the environment they are in. Generations before us did the same and we are carrying on.

11. Whilst I note the Historic and Heritage Statement and Appendix received by myself on 08/11/2024, this in itself would not be an assessment of the impact of the proposal on the setting of heritage assets, which is required by paragraph 200 of the NPPF which confirms that "local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

There are no heritage assets affected by this proposal. The timber shed was already on the site in a central position. Appendix 2 shows some 2019 pictures and map of the site with the timber shed in position. This was moved when the new steel frame building was built in 2019 until we could decide what to do with it. Together with raising capital for a new project. The new steel frame building blocks the view mostly to the new cafe proposal. Appendix 5, 6 and 7 show images of the view to the listed buildings. Arrow Lodge is completely out of view with the Mill only visible in the top corner of the roof. The warehouse has a small view of the site from the east corner but this is minimal. The view is currently the chicken shed with a tin roof and wooden walls. The proposal is planned with the same materials to minimise the impact on the area.

12. I acknowledge the comments made by the Building Conservation Officer in respect of application 190449, however this is in respect of the demolition of a building to facilitate a new building on a different part of the site, and not in respect of development on the current application site.

This is incorrect as the building set for demolition was the timber shed we are proposing for the cafe. When demolition begun the top floor was lifted off with cranes as seemed it could be used for a better purpose. This is definitely in respect of the application site as the new steel building is in the middle of the site visible from all sides.

13. I duly note the comments submitted by the Planning Archaeological Advisor.

These comments have been responded to in the historic and heritage statement.

14. Whilst supportive of the formation of a café on the site, and the loss of the buildings on the site, I am currently not able to support the current application as the impact of the proposal on the setting of the listed buildings and the conservation area has not been fully identified. Moreover, it is noted that the building is currently used for storage and as such the replacement for the building, confirmation what works/storage/retail activity/buildings on the site prominently sited next to a car park should have been fully addressed in the application.

The only loss of building on the site is the falling down chicken shed. This is in such poor condition that it is not going to stand for much longer, leaking roof and holes in walls. As said above and with Appendix 2 – 4 there is very little impact on the listed buildings compared to the building in 2019. There is very little visibility and we are using a building that has already been in view of the listed ones. The temporary location of the timber shed has been used temporary as storage. This is due to its location near the sales display area. Before it was here the area had garden centre goods on display and sale. We have not decided on the future of this location depending on how the cafe goes. The business has only limited finances for projects and must build up resources before the next idea. Before the building was here there were garden centre items on display here. These items have been pushed over the car park. This will help with moving these items back in the corner next to the fence and creating maximum car parking.

15. There would appear to be potential support for a café at the premises, however the full assessment of the site and the future of the listed buildings has not been referenced. Whilst supportive in principle of a café on the site, will this prejudice the re-use of the listed buildings at a later date

At the recent town council meeting it was decided the cafe would be an asset to the town. Many customers who come in the shop are very excited about the cafe. This area of the site is right next to the car park and retail shop/display area. Joining everything together. The listed buildings are away from this area and unaffected. We have no idea of the future of these buildings as finances and the economy will dictate what the business can afford and is feasible. There have been two comments of support on the planning site which also state what an asset this would be for the local community. Together with the constant comments from customers in the shop. The planning was advertised in the two local papers which gained much support.

16. In Historic England's guidance on setting of Heritage Assets, it repeats on page 2 advice in PPG, "When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation." (PPG, paragraph: 013, reference ID: 18a-013-20140306).

There timber shed is not a heritage asset and is being moved to a new location across the mill leat from its old location. Appendix 3. The other three listed buildings are not affected and could become more economically viable if the business is doing well and can utilise them once again.

17. This guidance is expanded upon on page 6

"the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect."

As above regarding the timber shed. Also extensive work with Middlemarch regarding the site, ecology and environment to improve the area which is currently a chicken shed, bare ground and run down. The feedback from local people and customers is all positive together with the town council in their response saying the cafe would be an asset to the town.

18. Whilst there is support in principle for the expansion of our local business, in this instance I am not able to support the current proposal in its current form, as based on the limited information provided it would not appear to comply with national legislation, national policy and CS policies.

This proposal complies both nationally and locally.

This project achieves several of the national priorities. The main one will be to grow the business through increasing the sales which will increase turnover and profitability. The new Cafe part of the proposal is something new to offer the consumer. This will attract new customers and better serve existing ones. Our Cafe will be a great experience for all with the rich history and the environmental plans through creating bio diversity areas (reference Post Development Report and Map). Making the business more attractive, sustainable and efficient to achieve growth. With this we aim to open

new product markets to new customers. Through the new café proposal this will need to be serviced with more staff. This is another national priority and one which is greatly needed in our area with limited job opportunities. We will be offering jobs at different levels to appeal to a wide range of skills and experience. Gradually increasing staffing levels year on year with the growth we have planned.

The local priorities set out in the LEP directory state rural business projects need to grow and expand. We are increasing our offering to customers by introducing a new proposal. Our business is steadily growing but we have now reached a ceiling without investment the business cannot continue to grow. Securing jobs and creating new ones for the future generations. Our company has been trading in the market town of Kington since 1801. Six generations of the Turner family have been running the firm all 223 years and with such a history in the local area the firm with the investment will continue for many years to come. Our location does not get any more rural, we are in a market border town in west Herefordshire. Mid Wales is two miles to the east and that opens up an amazing rural location for many rural communities. Herefordshire is the most sparsely populated county in England with agriculture one of the main employers. Within Kington there is limited employment with a small industrial estate, few shops on the high street and a growing population with 200 houses being built over the next five years. We want to support the local community through what J & P Turner can offer and support. All this will meet the local priorities.

When the application was submitted for the planning permission relevant local and national priorities were highlighted for consideration. These points are employment provision, achieving sustainable development and building a strong and competitive economy. Our proposal would comply with national and local policy.

19. Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990, which places a duty on Local Planning Authorities in the exercise of their duties to preserve or enhance the character or appearance of a conservation area. This statutory duty is repeated in Herefordshire Local Plan Core Strategy 2011 – 2031 including; Core Strategy Objectives 10 and 12, Policy SS6, LD1 and LD4.

Careful and extensive work has been carried out by Middlemarch and the detailed reports done to satisfy planning. Within our application is;

- Preliminary Ecological Appraisal Report, An ecological desk study and a walkover survey (in accordance with Phase1 Habitat Survey) was undertaken. The survey was carried out on the 11th July 2024 by George Miles MEnvSc (Principal Consultant) and Thomas Weston (Ecological Project Officer). An initial review of the ecological data was subsequently carried out to determine the features of ecological importance on site as well as a preliminary assessment of the potential impacts the proposed development could have on these features.
- Biodiversity Statement and Metric Assessment, From January 2024, the UK Mandatory minimum is a 10% net gain in biodiversity for all development. Herefordshire Council have set the minimum biodiversity net gain at 10%. The Biodiversity Metric Assessment completed using the proposed development and landscape plan demonstrates that an overall net gain exceeding the statutory 10% requirement can be expected on-site as a result of the proposed landscape creation and enhancement.

We are protecting and enhancing the area where the proposal is going to be.

20. NPPF para 212 advises that "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."

Currently on the site of the conservation area is a rundown chicken shed. This is on its last legs and will fall down soon. The building replacing it is of the same materials to minimise the impact. There is no new development as there is already a building on the site. This will enhance the area as the public will have better access to areas never seen before. See Post Development Report and Map together with Biodiversity Statement and Metric Assessment to see the ecological benefit of the project.

21. Policy SS6 of the Herefordshire Local Plan Core Strategy 2011 – 2031 requires that development proposals should conserve and enhance those environmental assets that contribute towards the county's distinctiveness in particular its settlement pattern, landscape, biodiversity and heritage Assets.

This is answered in point 19/20

22. Policy LD1 of the Herefordshire Local Plan Core Strategy 2011 – 2031 requires that development proposals should:

- demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas;
- conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including .....conservation areas; through the protection of the area's character and by enabling appropriate uses, design and management;

The new cafe is going to be of the same materials as the existing building so minimal impact. This scheme is preserving the old timber building. This has also been answered in point 19/20.

23. Policy LD4 of the Herefordshire Local Plan Core Strategy 2011 – 2031 requires development proposals affecting heritage assets and the wider historic environment should:

1. Protect, conserve, and where possible enhance heritage assets and their settings in a manner appropriate to their significance through appropriate management, uses and sympathetic design, in particular emphasising the original form and function where possible;
2. where opportunities exist, contribute to the character and local distinctiveness of the townscape or wider environment, especially within conservation areas;

This is answered by point 11/19/20

24. Based on the current submission it is not clear how the proposal would satisfy section 66, 72 (as amended by the LURA 2023). NPPF para 212, of CS policies SS6, LD1 or LD4, in that the setting of listed buildings are neither preserved or enhanced, nor the character or appearance of the conservation area.

As we have stated the listed buildings are preserved and the character/appearance of the conservation area has been enhanced and improved.

25. As such the proposal would raise an objection in built heritage terms not for the principle of a café, but on the current proposal. If there is support for the provision of a café, it is suggested that the application be withdrawn, and resubmitted as a pre-application to engage all the necessary consultees to deliver a scheme that would achieve a café on the site that would comply with national legislation both heritage, archaeological and ecological, national Policy and CS policies. The utilisation of the listed buildings would be encouraged wherever possible.

There is a lot of local support for our cafe which would work perfectly in the location we have decided. The listed buildings are away from the main shop/office and not feasible for such use. The cafe addresses the heritage/history of the site by re using an existing building. The ecology in the conservation area is dramatically improved by new hedge planting, large bio diversity areas and tree planting. Middelmarsh have done a great deal of work to support this scheme.

26. The statutory duty under section 66 has been considered by the Court of Appeal and in East Northamptonshire DC v Secretary of State for Communities and Local Government [2014] EWCA Civ 137. Sullivan LJ at paragraph 24 said that: "Parliament in enacting s.66(1) did intend that the desirability of preserving the settings of listed building should not simply be given careful consideration by the decision maker for the purpose of deciding whether there would be some harm but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise." Where harm under section 66 of T(PLBCA)A 1990 has been identified the duty that the desirability of preserving the settings of listed buildings cannot be treated as mere material considerations to which weight can be attached as decision makers see fit, but when it decides that there would be such harm, that harm must be given considerable importance and weight. "...a finding of harm to the setting of a listed building gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering." [ In R (Forge Field Society) v Sevenoaks DC [2015] JPL 22]

The listed buildings are unaffected by the proposal.

27. There is much case law which provides clarification on the balance of weight and harm and utilising the case of North Norfolk District Council v SSCLG [2014] EWHC 279 the ruling confirmed that “following the simple balancing exercise under NPPF 134 [previous NPPF] does not mean that a decision-maker will ipso facto comply with the duties under s.66(1): [83]. It is necessary for a decision-maker to direct their mind to s.66(1).”

**The listed buildings are unaffected by the proposal.**

28. However should you wish to determine the application in its current form I would have to object for the following reasons.

29. In respect of section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, and Herefordshire Local Plan Core Strategy 2011 – 2031 – Policies SS6, LD1, LD4, it has not been demonstrated that there is no harm to the setting of; UID 1279480 Arrow Lodge Mill included on the statutory list on 26/07/1976, UID 1196556 Arrow Lodge included on the statutory list on 07/08/1972, and UID 1297581 Warehouse at Arrow Lodge included on the statutory list on 26/07/1976, or the wider Kington Conservation Area, which is considered to be a Heritage Asset at Risk. The public benefits would not outweigh this harm and therefore the proposal would be contrary to; section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, NPPF, and CS Policies SS1, LD1 and LD4 which, amongst other things, seek high quality design that protects, conserves and where possible enhances heritage assets and their setting in a manner appropriate to their significance.

30. The proposal, fails to fulfil the duty set out by Section 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990 to preserve or enhance the character or appearance of the area, and would be contrary to policies SD1, LD1, LD4 and SS6 of the Herefordshire Local Plan Core Strategy

## **Conclusion**

There is a huge benefit to the local/rural economy as a result of our proposed project. We have been a part of the local area since 1801 and with this proposal and growth this will keep the business servicing the area. We will see additional customers, which will increase sales and ultimately turnover and profit per annum.

Within the local community we have hosted events. During the summer and Christmas event we open up the site for all to explore what we do. We give tours around our mill and turbine to walking and history groups. We have activities for people to do, food and drink to keep people happy and local stalls which integrates us with the community. This project will improve the site so that more events like these two can be staged and better serviced. We regularly have children’s nursery and school children’s groups visit the site. They come at different times of the year to gauge what is happening and to better understand what each season holds. With our proposal and more accessible site visiting groups will be able to better explore the site and feel safer while we educate them. We can open up to more interested groups such as gardening groups and local groups. The listed buildings on site are very important to us and J & P Turner. They will be looked after now and in the future. They are all unaffected by this proposal and enhanced but helping the site and business grow. People can walk through the site currently and see our amazing buildings. This proposal benefits all and should be granted permission.



# J. & P. Turner

*Corn & Seed Merchants*

Established 1801

Arrow Mills, Kington, Herefordshire. HR5 3DU.

Tel : (01544) 230536

## Historic and Heritage Impact Appendix

APPLICATION NO & SITE ADDRESS: 240969 –

Arrow Mills, Island Terrace, Kington, Herefordshire, HR5 3DU

DESCRIPTION: Proposed single story cafe building at J & P Turner.

APPLICATION TYPE: Planning Permission

Planning Application for the proposed new café at J & P Turner, Kington.

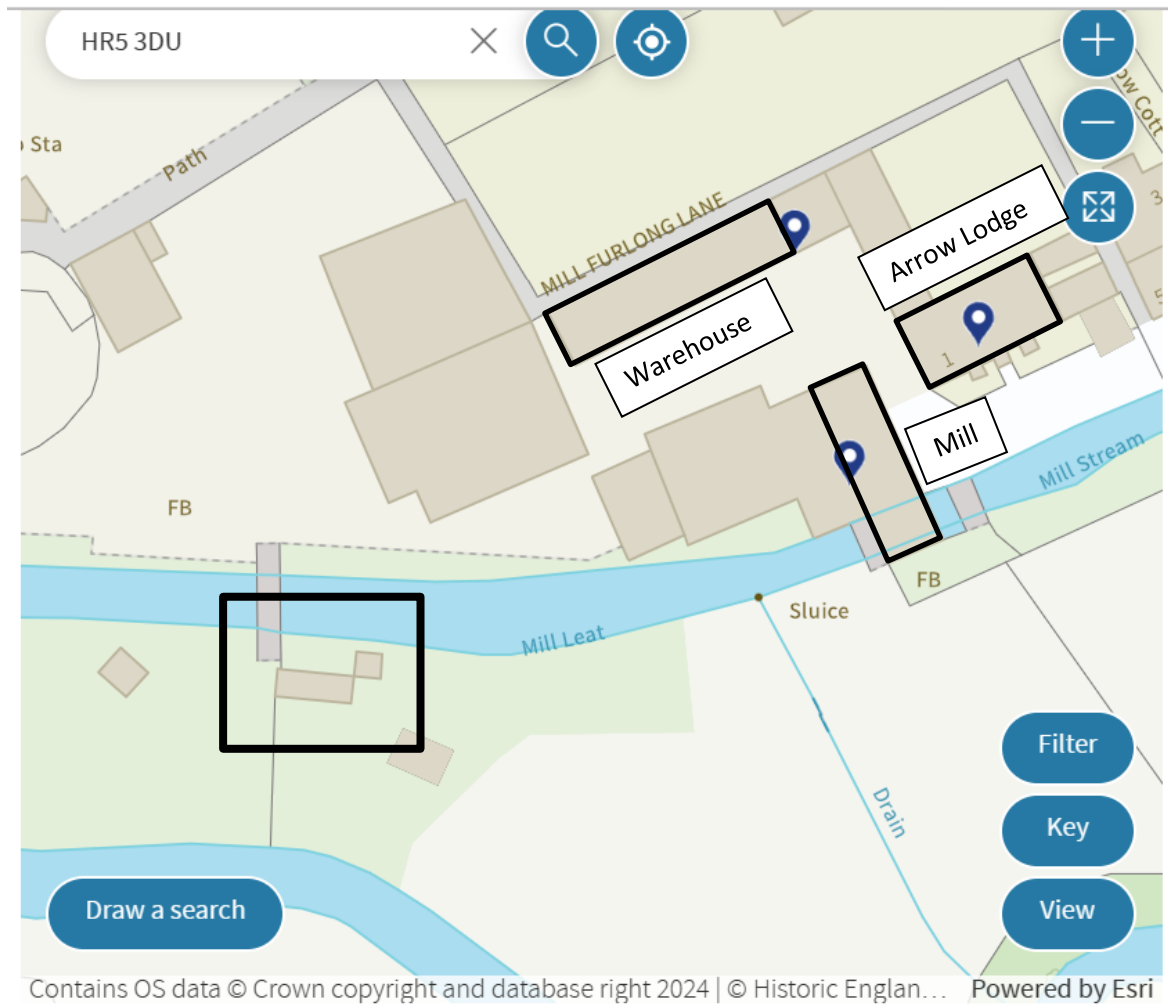
### Appendix 1



## Appendix 2

Listed building map of HR5 3DU and proposed café site in black box

<https://historicengland.org.uk/listing/the-list/map-search?postcode=HR5%203DU&clearresults=True>



## Appendix 3

This shows the timber shed before it was moved for planning permission 190449 in 2019.

**SITE LOCATION PLAN**  
**AREA 2 HA**  
**SCALE 1:1250 on A4**  
**CENTRE COORDINATES: 329787, 256453**



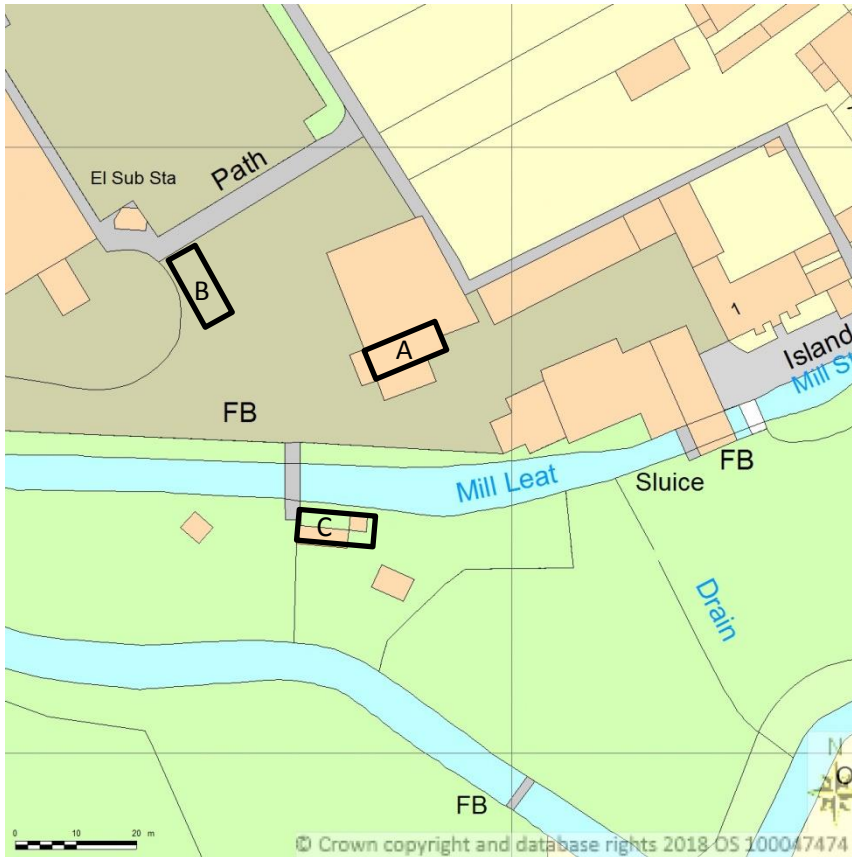
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Internal View

## Appendix 4

This map shows the original position of the timber shed Point A. The current location Point B in the corner of the yard and Point C its final position for the Café.

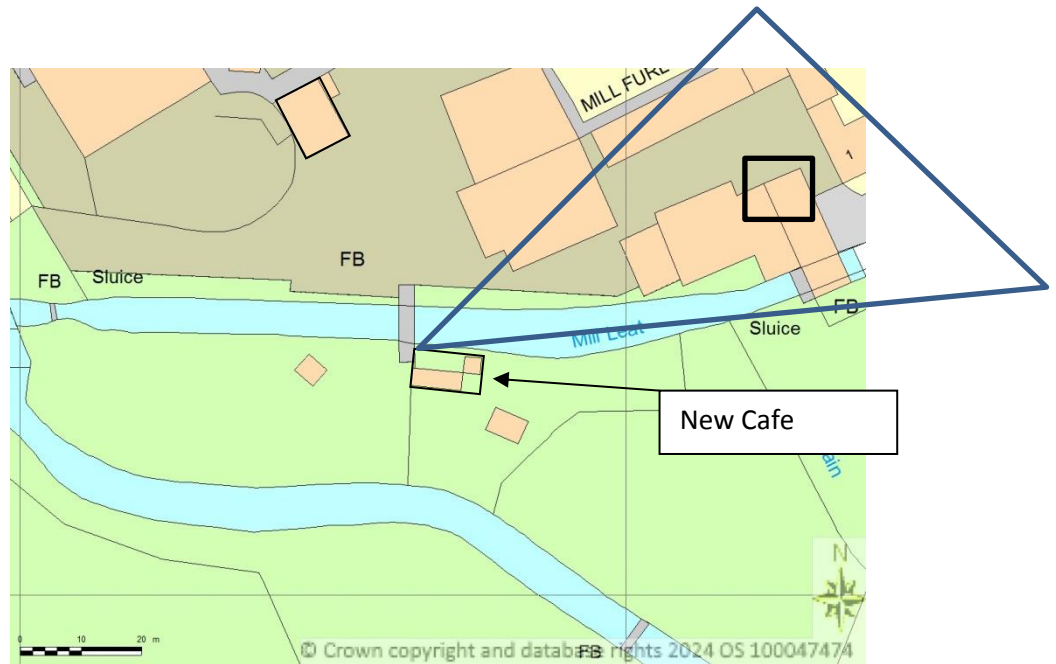




## Appendix 5

View North East from furthest West corner of new proposal

**AREA 2 HA**  
**SCALE 1:1250 on A4**  
**CENTRE COORDINATES: 329769, 256459**



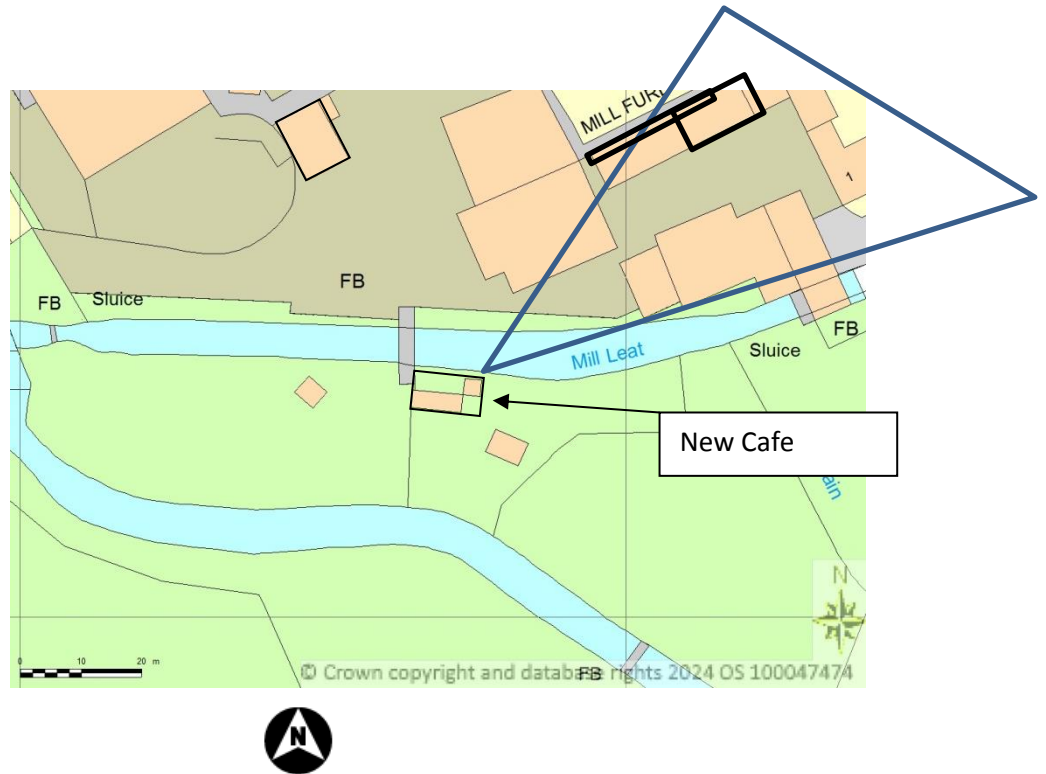
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## Appendix 6

View looking North East from furthest East corner of new proposal

AREA 2 HA  
SCALE 1:1250 on A4  
CENTRE COORDINATES: 329769, 256459



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## Appendix 7

View looking South West from furthest East corner of Warehouse

**AREA 2 HA**  
**SCALE 1:1250 on A4**  
**CENTRE COORDINATES: 329769, 256459**



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