THUNDRIDGE NEIGHBOURHOOD PLAN 2018- 2033

SITE ASSESSMENT PROCESS

Background Document

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1. Introduction

1.1 This document was prepared for Thundridge Parish Council and Thundridge Neighbourhood Plan Advisory Committee to provide background information on the process of site finding and assessment for Thundridge Neighbourhood Plan.

1.2 Appendix H in the Thundridge Neighbourhood Plan (the Plan) provides some of the background to the site allocations and a brief summary of the process followed by the Thundridge Neighbourhood Plan Advisory Committee and Housing Group, in preparing the housing site allocations for the Plan. In particular it explains the strategic planning context that changed during the preparation of the Plan.

1.3 At the start of the Plan preparation process, the villages of Thundridge & Wadesmill were Category 2 villages in the Green Belt and High Cross was a Category 1 village in the Rural Area Beyond the Green Belt. In the current East Herts District Plan all the villages are now classified as Group 2 villages, each with its own village development boundary. Thundridge & Wadesmill are over washed by Green Belt and High Cross is shown as a village excluded from the Rural Area Beyond the Green Belt.

1.4 This background document explains the steps that were taken to arrive at the final site allocations for the Plan. Much of the information contained in this background document can be found elsewhere in the suite of neighbourhood plan documents, including the Consultation Statement, for clarity. The process is described in full here.

1.5 In summary, the inputs to the process were:

- Site assessment criteria
- List of sites
- Comments from consultation events
- Changes in planning policy
- Relevant planning decisions
- Response from the Parish Council

1.6 The stages of site allocation process are mapped out in the table below. This shows the main stages of the process in the top row of the table and the sites, number of sites being considered, and inputs to the process in the first column.

Fig 1. Map of Site Allocation Process Stages

	Initial site gathering exercise	Post Consultation Event II	Interim neighbour-hood plan development	Post Consultation Event III	Pre-sub-mission	Sub-mission
Sites	T1 – T21	Sites T1-T23 (incl. T3a/b & T6/T6a)	Majority of sites discounted	T19 & T23	T19 & T23	T19 & T23
Number of sites	21	25	2 (+5)	2	2	2
Inputs to process	Survey, SLAA, local knowledge	Public comments/ suggestions	Policy change/ planning applications	Public comments/ Consultation with East Herts	New sites put forward but rejected	

2. Process Inputs

Site Assessment Criteria

2.1 The Housing Group devised a set of criteria (see Fig 2) against which each site could be evaluated. The first two critical criteria sought to eliminate sites in the Green Belt and those which were not in or adjacent to the village boundary. These were followed by a set of 15 major constraints and a further set of 12 additional constraints; 29 in all. To provide guidance on using the criteria to assess sites, a scoring guidance spreadsheet was prepared (see Appendix 1). This provided examples to help ensure sites were scored in a consistent manner.

Fig 2. Initial Site Assessment Criteria

CRITICAL CONSTRAINTS
Is the site located in the Greenbelt?
Where is site relative to proposed village boundary?
MAJOR CONSTRAINTS
Density of Proposed Development
Does the site have features of significance for biodiversity e.g (SSIs, TPOs, wildlife designations, protected species etc)?
Is the site in an area of flood risk?
Is there direct highway access?
Can the site be classified as infill?
Would the development of the site be compatible with the needs of the surrounding area?
Are there any archaeological constraints on the site?
Is the site in a Conservation area?
Is the site a greenfield/garden/brownfield site?
Would development of the site constitute loss of a significant open space important to the character of the village?
Would development of the site affect the setting of listed buildings or monuments?
Would development of the site constitute organic growth in the village?
Is the site available for development within the plan period?
Does the site include areas of best and most versatile agricultural land (ALC Grade 2 or 3a)
Would the development impact the setting of the village or any of the designated important views?
ADDITIONAL CONSTRAINTS
Can the site be connected to the foul sewer?
Does the site contain any watercourses?
Does the site have utilities or ready access to utilities?
Has the site got a history/risk of contamination?
Is the site readily accessible to Thundridge, Wadesmill or High Cross?
Is the site currently used for employment purposes?
Is the topography of the site suitable for development?
Do any footpaths/POW cross the site?
Are there any adverse geological features on the site?
Is the site connected with public transport?
Is there previous planning history on the site?
Are there any safety issues relating to the site and/or its setting? E.g. relationship to schools/play grounds etc

2.2 Following discussion in the Housing Group, the final revised set of criteria split major constraints into two categories; major constraints and semi-major constraints. The total number of assessment criteria was 30, the additional criterion related to surface water drainage. This additional criterion was added in response comments on two sites in the 2017 consultation event; site T8 (High Road, High Cross behind Canterbury Park) and T21 (High Road, High Cross opposite Puller Memorial School).

2.3 Weightings were used to distinguish between sites achieving similar scores. Critical constraints carried a weighting of four, major constraints and semi-major constraints were weighted three and two respectively and additional constraints were weighted one or neutral. The final criteria can be seen in Fig 4 below, which shows the scoring for the sites chosen as site allocations.

2.4 Both the sum of the criteria scores and the weighed scores were presented in a spreadsheet. Green shading on the spreadsheet indicated potential site allocations.

2.5 At this stage in the process, the Housing Group were joined by members of the Community Group and the Environment Group who reviewed the site scoring. It came to light that one of the sites which had been shaded green would have caused significant harm to a designated Local Wildlife Site and so this site was removed from the potential sites list.

2.6 At a similar point in time, the planning policy changes that had come about as a result of the issuing of the East Herts District Plan Inspectors Report impacted on the site allocations assessment criteria. The weighting of criteria 2 (Where is the site in relation to the proposed village boundary?) became redundant for villages in the Green Belt. Only sites within the village boundary of Thundridge and Wadesmill could be allocated for development in the neighbourhood plan. Site T18 (Wadesmill, garden of Wellcroft) could no longer be put forward as a potential housing site allocation.

List of Sites

2.7 The initial list of sites was compiled from East Herts District Council's Strategic Land Availability Assessment (SLAA), the results of the Thundridge Parish Neighbourhood Plan Residents Survey (the Survey) and local knowledge. Question 49 of the Survey asked if landowners "Do you own any land which you would consider/like to put forward for potential development?" Five landowners expressed an interest and their suggestions were followed up in confidence. Question 51 of the Survey asked if there were any other sites that respondents thought should be development. Replies to this question where added to the list except where they replicated sites already identified or where, for example, the site was allocated for Employment by East Herts.

2.8 A. full report of the Survey can be found on Thundridge Parish Council's website https://www.thundridgeparishcouncil.org.uk/

2.9 At the second consultation event on 11 November 2017, 21 sites were displayed as potential housing sites using maps and a template to describe each site. The sites were numbered consecutively and prefixed by 'T'.

Fig 3. Initial Site Assessment Template for Consultation

2.10 These 21 sites included several large sites outside the built-up area of High Cross village including site T15 and sites between the village and the A10, including sites T9, T11 (SLAA 42/004), T12 (42/008) and T13 (SLAA 42/006).

2.11 Following the consultation event and the comments received, further work on the list of sites included splitting site T3 (Poles Lane, adjacent to Thundridge House) into two options; T3a for 5 houses and a small section of the site (T3b) for one house and site. Site T6 (High Road, High Cross, south of Oakley Horseboxes) was also split into T6 and T6a.

2.12 Two new sites were also added at this time: T22, a site of 0.235 hectares on Ermine Street at Standon Green End and T23 (SLAA 42/009), north of North Drive, High Cross.

2.13 T22 was the site occupied by The Raj Villa which has now closed. The restaurant was set back from the road with a parking area in front. A planning application for housing had been expected. The site scored comparatively well and could have potentially been put forward in the neighbourhood plan but for its location well outside the nearest village of High Cross.

2.14 T23 was assessed in East Herts SLAA in 2016. It was put forward by the landowner, East Herts Council. In the report of the District Plan District Planning Executive Panel on 25 February the 2016 amended SLAA report described the site as "This is a greenfield site which lies within the village boundary. Although

there are access issues the site is considered to be suitable." However, in the Strategic Land Availability Assessment 2017, which appears to postdate this report and which forms part of the evidence base for the District Plan the site was described as "This is a greenfield site which now lies outside the settlement boundary. Access to this site is considered to be a major constraint, and as such it is considered that the site is unsuitable."

2.15 Notwithstanding the confusion around the District Council's assessment of the site, the fact remained that site T23 was likely to be within the built-up area of High Cross in the adopted East Herts District Plan. Despite the access issues, the site was considered achievable and having been previously put forward by East Herts in the Call for Sites, was also considered to be available.

2.16 The final list comprised 25 sites in all. However, between the list being finalised and the consultation event in July 2018, it became evident that there would be a change in planning policy that would reduce the status of High Cross to a Group 2 village where there would be no specific housing target. The implications of this policy change are described below in paragraph 2.22 – 2.25.

2.17 As a result of policy changes, the Parish Council's position with regard to sites outside the built-up area of the settlements in the neighbourhood plan area changed. The decision was made by the Parish Council with the support of the Advisory Committee, to only consult on sites within the village boundary.

2.18 At the final consultation event on 15 July 2018 seven sites were displayed. Residents were asked to comment on the two remaining proposed housing site allocations i.e. T19 and T23. In addition, residents were asked if they would support any of five other sites, supported at the previous consultations, should either the District Plan not be adopted or if development proposals on these sites should come forward independently of the Plan. It was felt that this opportunity should be utilised to gather public views to inform the Parish Council should it need to respond to future planning applications on these sites.

2.19 The scoring for sites T19 and T23 can be seen below next to the final set of assessment criteria in Fig 4.

Fig 4. Final Site Assessment Criteria with Scores for T19 & T23

Site Reference			T19	T23
Location			High Cross	High Cross
	Approx. Site Area [m^2]		500	3000
	Proposed Number of Properties		1	8
	Proposed Property Density [dph]		20	26.666667
	Maximum Number of Properties [30dph]		1.5	9
	Maximum Number of Properties [24dph]		1.2	7.2
	Maximum Number of Properties [16dph]		0.8	4.8
Number	CRITICAL CONSTRAINTS	Weighting		
1	Is the site located in the Greenbelt?	4	4	4
2	Where is the site relative to proposed village boundary?		4	4
	MAJOR CONSTRAINTS			
3	Density of Proposed Development	3	0	0
4	Would the development of the site be compatible with the needs of the surrounding area?		3	0
5	Would development of the site constitute organic growth in the village?		4	4
6	Would the development impact the setting of the village or any of the designated important views?		4	2
	SEMI-MAJOR CONSTRAINTS			
7	Does the site have features of significance for biodiversity?	2	2	4
8	Is the site in an area of flood risk?		4	4
9	Is there direct highway access?		1	1
10	Can the site be classified as infill?		4	3
11	Are there any archaeological constraints on the site?		4	4
12	Is the site in a Conservation area?		4	4
13	Is the site a greenfield/garden/brownfield site?		2	3
14	Would development of the site constitute loss of a significant open space important to the character of the village?		4	4
15	Would development of the site affect the setting of listed buildings or monuments?		4	4
16	Is the site available for development within the plan period?		4	4
17	Does the site include areas of best and most versatile agricultural land (ALC Grade 2 or 3a)		4	4
	ADDITIONAL CONSTRAINTS			
18	Can the site be connected to the foul sewer?	1	1	4
19	Does the site contain any watercourses?		4	1
20	Does the site have utilities or ready access to utilities?		0	4
21	Has the site got a history/risk of contamination?		4	3
22	Is the site readily accessible to Thundridge, Wadesmill or High Cross?		4	4
23	Is the site currently used for employment purposes?		4	4
24	Is the topography of the site suitable for development?			
25	Do any footpaths/POW cross the site?		4	4
26	Are there any adverse geological features on the site?			
27	Is the site connected with public transport?		0	1
28	Is there previous planning history on the site?			
29	Are there any safety issues relating to the site and/or its setting? E.g. relationship to schools/play grounds etc		4	0
30	Are there problems with surface water drainage on the site?			
Total	Sum of All Criteria Scores		81	78
	Sum of All Criteria Scores with Weighting Applied		171	147
	Number of Dwellings Deliverable with Most Suitable Sites Selected		1	17

Comments from consultation events

2.20 The full report of responses from Consultation Event III can be found in the Consultation Statement. A summary of Housing Site Allocation Feedback for additional sites (not proposed to be allocated) is shown in the table below.

Fig 5. Response from Consultation on additional sites

Site	For	Against
T3	11	17
T6	0	29
T7	0	34
T8	0	32
T18	16	8

2.21 Comments received from Consultation Event III for site T19 and T23 included issues raised by several residents about access along North Drive, along with support for both sites, including noting that T23 is a good location on land with limited environmental value and the only available development site within the village boundary. Comments were also made about the need for small affordable homes for young families.

Changes in planning policy

2.22 A significant change in planning policy affecting parishes preparing neighbourhood plans occurred in 2018. The Main Modifications to the East Herts District Plan, published in March 2018, included the removal of High Cross from the list of Group 1 villages in District Plan Policy VILL1. This resulted in the removal of any requirement to allocate land for housing in a neighbourhood plan.

2.23 The District Plan Inspectors Report was issued in June 2018. This confirmed that all three villages, Thundridge, Wadesmill and High Cross were identified as Group 2 villages where development would be guided by Policy VILL2. Policy VILL2 allowed for limited infilling for housing in the built-up area as defined on the East Herts District Plan 2018 Policies Map.

2.24 Paragraph 10.3.9 of East Herts District Plan 2018 provides an option for parishes preparing neighbourhood plans, to identify small-scale development (larger developments than infill) within the built-up area of the villages. Thundridge and Wadesmill fell into this category. In the case of High Cross which is set within the Rural Area Beyond the Green Belt, neighbourhood plans could identify sites for development on the periphery of the built-up area of the village.

2.25 None of the sites in the list of sites initially prepared for the Plan were in the built-up area of Thundridge or Wadesmill and so could not go forward in the site assessment.

Relevant planning decisions

2.26 Two of the sites in the potential site allocations list were the subject of planning applications during the preparation of the Plan; these were site T14 (High Road, High Cross, corner of Pest House Lane and High Road) and T21 (High Road, High Cross, opposite Puller Memorial School).

2.27 Site T21, application no 3/17/2216/OUT, 'Outline application for 27no. dwellings - all matters reserved except for access, Land West of High Road High Cross Hertfordshire' was refused planning permission on 26 April 2018.

2.28 Site T14, application no 3/18/0670/FUL, 'Erection of 9 dwellings comprising 5no. 5 bed houses and 4no. 1 bed flats, Land at Oaklands Ermine Street High Cross Ware Hertfordshire' was refused planning permission on 25 July 2018. The Parish Council arranged a public meeting to hear the community's views on the application in High Cross on 24 June 2018. No one who expressed a view was supportive of the application and the Parish Council consequently decided to object to the application by letter dated 25 June 2018.

2.29 Both applications were refused because the proposed development would be sited outside the village boundary of High Cross within the Rural Area Beyond the Green Belt and would result in harm to the rural landscape. As a result, they were removed from the potential site allocations list.

2.30 In addition, important lessons were learned from the process of dealing with the planning application for development on Glebe Field, North Drive, High Cross (site T11) in February 2017. The application was refused in June 2017 on the grounds that the undeveloped area of land performs an important function in the settlement by virtue of its historical association with the church and rectory. Despite issues raised by the Parish Council at the time about access on North Drive, the state of the road was not a reason for refusing the application. The applicant was willing to sign an agreement to upgrade the length of North Drive up to number 53.

2.31 The applicant went to appeal, and the appeal was eventually dismissed in February 2019 on the grounds of the impact on the village's heritage assets.

2.32 This first-hand experience of what is and what is not a valid planning reason for refusing an application for development on North Drive has resulted in some confidence that the poor access to the site could be overcome.

2.33 The identification of T23 as a site allocation has allowed careful consideration of the capacity of the site and the conditions that should be put on its development e.g. North Drive must be constructed as close to an adoptable standard as possible within the existing footprint, including the road make-up, drainage and lighting, before any site construction takes place, to protect the interests of residents of North Drive.

Response of Thundridge Parish Council

2.34 The Parish Council has played an active role, providing support for the Advisory Committee throughout the process of preparing the Plan. When the Plan preparation began, they had expected to be tasked with finding sites in High Cross for new homes, that would accommodate at least a 10% expansion in the number of households in the village at the 2011 Census.

2.35 Residents identified, through the Residents Survey the types of housing that they felt was needed in the village. This information was supplemented by an analysis of census data to establish population trends that might lead to particular housing needs. It was established that there was an appetite to build a limited number of additional homes in the starter home and downsizing categories.

2.36 The planning policy changes meant a U-turn in Parish Council thinking and a resolution was made to consider only available and suitable sites within the High Cross village area boundary.

2.37 Despite some objections being received by residents both against T19 and T23 there was also continuing support for the Plan to include a small number of new homes.

2.38 Both site owners confirmed their willingness to develop their sites in the life of the Plan and are aware of the Plan's policies for housing development and their sites in particular.

2.39 Further contact with the District Council's Property Services Department has provided both a recent verbal reassurance followed by written confirmation that the Council do intend the develop site T23. Notwithstanding their previous resolution to put forward the site in the District Plan Call for Sites the Council has confirmed by letter dated 3rd June 2019 that the District Council land ownership at the back of Poplar Close, North Drive High Cross "is being held in anticipation of future housing development which it is intended would be delivered within the plan period of 2018 – 2033."

3. Conclusion of the process

3.1 Despite changes in policy and the issuing of significant planning decisions, the Plan includes two well researched sites with confirmed availability for housing development, which will provide for the needs of the village. Further proposals for housing development which do not accord with the policies in the Plan should be rejected and the robustness of the Site Allocation process will support this.

Appendix A: Housing Group Site Assessment Criteria Scoring Guidance Sheet.

ASSESSMENT CRITERIA		ASSESSMENT RATING		
Number	CRITICAL CONSTRAINTS	4 (Most Suitable)	3	2
1	Is the site located in the Greenbelt?	Not in the greenbelt	Not in the greenbelt but adjacent to it	In the greenbelt but within village boundary
2	Where is site relative to proposed village boundary?	Inside the village boundary	Inside but on edge of village boundary	Outside but adjacent to village boundary
	MAJOR CONSTRAINTS			
3	Density of Proposed Development	Less than 16dph	16 - 23dph	24-30dph
4	Would the development of the site be compatible with the needs of the surrounding area?	Small development with a high percentage of bungalows or small houses for locals	Small development with a high percentage of bungalows or small houses	Medium size developments (6-20) with potential for high proportion matching local needs
5	Would development of the site constitute organic growth in the village?	Single Dwelling	2-6 dwellings	7-12 dwellings
6	Would the development impact the setting of the village or any of the designated important public views?	Minimal impact	Impact on a single important public view	Changes character of a street or open space
	SEMI-MAJOR CONSTRAINTS			
7	Does the site have features of significance for biodiversity e.g (SSIs, TPOs, wildlife designations, protected species etc)?	Nothing of significance in vicinity of site	Wildlife site adjacent to site unlikely to be impacted	Wildlife site adjacent to site likely to be impacted
8	Is the site in an area of flood risk?	Very low risk of flooding	Low risk of flooding	Moderate risk of flooding
9	Is there direct highway access?	Direct access to Cambridge Rd	Direct access to adopted road	Access via unadopted road
10	Can the site be classified as infill?	Small number of new dwellings on previously developed site in built up area of village	Small number of new dwellings on undeveloped site in built up area of village	Small number of new dwellings on previously developed site outside village boundary
11	Are there any archaeological constraints on the site?	Archaeological survey performed indicating nothing of significance	Previously developed site with no evidence of archaeological findings	No known history on the site but located near to area of historical occupation e.g. Ermine st
12	Is the site in a Conservation area?	Site not located near conservation area	Site located on edge of conservation area	
13	Is the site a greenfield/garden/brownfield site?	Brownfield - previous residence	Brownfield - previous commercial use	Garden of existing dwelling
14	Would development of the site constitute loss of a significant open space important to the character of the village?	No		
15	Would development of the site affect the setting of listed buildings or monuments?	No		
16	Is the site available for development within the plan period?	Deliverable within 2 years	Deliverable 2-5 years	Deliverable 5-10 years
17	Does the site include areas of best and most versatile agricultural land (ALC Grade 2 or 3a)	Not agricultural land	ALC Grade 5	ALC Grade 4
	ADDITIONAL CONSTRAINTS			
18	Can the site be connected to the foul sewer?	Sewer passes in front of site with capacity	Sewer passes in front of site requiring minor upgrade	Sewer located within 50m of site with capacity
19	Does the site contain any watercourses?	Site located away from any watercourses	Watercourse is dry much of the year	Culvert passes under the site
20	Does the site have utilities or ready access to utilities?	Ready access to electricity, gas and telecoms	Minor upgrade to single utility required	No gas present in the vicinity of the site
21	Has the site got a history/risk of contamination?	Previous residential site with minimal risk	Greenfield site with minimal risk	Brownfield site with minimal risk
22	Is the site readily accessible to Thundridge, Wadesmill or High Cross?	Site is within one of the village boundaries	Site is on the edge of one of the village boundaries	Site is within 400m of one or more villages
23	Has the site historically been used for employment purposes?	Never used for employment	Historic use for employment	Recent use for employment
24	Is the topography of the site suitable for development?	Flat site with few topographical features	Generally flat site with some topographical features	Gently sloping or undulating site
25	Do any footpaths/POW cross the site?	No		Footpaths/PROW can be maintained and incorporated into development
26	Are there any adverse geological features on the site?	No known features		
27	Is the site connected with public transport?	Bus stop outside site	Bus stop within 100m of site	Bus stop within 400m of site

ASSESSMENT CRITERIA			
Number	CRITICAL CONSTRAINTS	1	0 (Least Suitable)
1	Is the site located in the Greenbelt?	In the greenbelt adjacent to village boundary	In the greenbelt outside village boundary
2	Where is site relative to proposed village boundary?	Within 1/2 mile of village boundary	Away from village boundary
	MAJOR CONSTRAINTS		
3	Density of Proposed Development	30-35dph	Greater than 35dph or unknown
4	Would the development of the site be compatible with the needs of the surrounding area?	Potentially compatible - insufficient detail at this stage or large % of dwellings compatible with local needs	Large development and/or large percentage of 4-5 bed detached houses
5	Would development of the site constitute organic growth in the village?	13-19 dwellings	Over 20 dwellings
6	Would the development impact the setting of the village or any of the designated important public views?	Blocks public view of important buildings within village	Impact on multiple important public views
	SEMI-MAJOR CONSTRAINTS		
7	Does the site have features of significance for biodiversity e.g (SSIs, TPOs, wildlife designations, protected species etc)?	Area of habitat suitable for restoration/wildlife corridor	SSI on site
8	Is the site in an area of flood risk?	High risk of flooding	Recent history of flooding
9	Is there direct highway access?	Access via private road, bridleway or other route	No direct access
10	Can the site be classified as infill?	Large number of dwellings within village boundary or small number of dwellings within 200m of village boundary adjacent to existing dwellings	Large number of dwellings on edge or outside village boundary
11	Are there any archaeological constraints on the site?	Archaeological finds of minor significance previously found	Significant archaeology previously found
12	Is the site in a Conservation area?	Site located in conservation area but unlikely to detract from street scence	Site located in conservation area and likely to affect the setting/street scene
13	Is the site a greenfield/garden/brownfield site?		Greenfield site
14	Would development of the site constitute loss of a significant open space important to the character of the village?		Yes
15	Would development of the site affect the setting of listed buildings or monuments?		Yes
16	Is the site available for development within the plan period?	Deliverable 10-15 years	Unlikely within plan period or unknown
17	Does the site include areas of best and most versatile agricultural land (ALC Grade 2 or 3a)	ALC Grade 3b	ALC Grade 3a/2/1
	ADDITIONAL CONSTRAINTS		
18	Can the site be connected to the foul sewer?	Sewer located within 100m of site with capacity	Sewer located more than 50m from site or requires major upgrade to meet capacity
19	Does the site contain any watercourses?	Stream/brook/drainage ditch crosses or bounds the site	River crosses or bounds the site
20	Does the site have utilities or ready access to utilities?	Major upgrade to single utility required	No ready access to utilities
21	Has the site got a history/risk of contamination?	Previous industrial site	Known history of contamination on or around the site
22	Is the site readily accessible to Thundridge, Wadesmill or High Cross?	Site is within 800m of one or more villages	Site is over 800m from one of the villages
23	Has the site historically been used for employment purposes?	Current use for employment	Current use for employment with parish residents employed
24	Is the topography of the site suitable for development?	Steeply sloping site	Difficult site to develop
25	Do any footpaths/POW cross the site?		Footpaths/PROWs with limited potential to divert
26	Are there any adverse geological features on the site?	Chalk bedrock with no known issues	History of sinkholes
27	Is the site connected with public transport?	Bus stop within 800m of site	Nearest Bus stop over 800m from site

Appendix B: Maps of Housing Sites Assessed