

# Appendix 3

## Development Management Policies Development Plan Document: Proposed Submission (December 2015)

### Table of minor modifications

(N.B. Existing text deleted shown as struck-through, new text shown in red and underlined, repositioned text shown in green and underlined.)

Policy / paragraph / map	Amendment	Reason
<b>Foreword</b>	<p>I hope you will take this opportunity to participate in the process of drawing up the new plan. If we are to shape the borough the way you want to see it then we need to hear from you. Please tell us what you think.</p> <p><b>HOW TO GIVE YOUR VIEWS</b>            The Development Management Policies Publication Stage Document is published for comments on its soundness. Further copies of this document can be downloaded from the Brent Council website at <a href="http://www.brent.gov.uk/dmp">www.brent.gov.uk/dmp</a>.            Make your comments by the following ways: Online via the interactive web version of this document at <a href="http://www.brent.gov.uk/dmp">www.brent.gov.uk/dmp</a>            By email to <a href="mailto:ldf@brent.gov.uk">ldf@brent.gov.uk</a>            In writing addressed to: Planning Policy and Projects Team, Planning and Regeneration, London Borough of Brent, Brent Civic Centre, Engineers Way, Wembley, Middlesex HA9 0FJ            Please reference your comments to the relevant policy or paragraph of the document.            All comments must be received by 5pm on 5<sup>th</sup> November 2015.            Any representations made in relation to this document will be made available to the public.</p>	To update
<b>1.1</b>	This Development Management Policies document. It sets out the Council's policies which along with other policies within the Development Plan will be used for the determination of planning applications for development in the borough.	Correction
<b>1.4</b>	There is now an opportunity to comment on the publication version of the Plan before it is submitted for Examination by an independent Planning Inspector. At this stage comments should relate to whether you consider that the Plan is 'sound'. To be 'sound' a plan should be positively prepared, justified, effective and consistent with national policy.	To update
<b>DMP 1</b>	Subject to other policies within the development plan, development will be acceptable provided it is: a. of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high	Clarification

	<p>levels of internal and external amenity and complements the locality;</p> <p>b. satisfactory in terms of means of access for all, parking, manoeuvring, servicing and does not have an adverse impact on the movement network;</p> <p>c. provided with the necessary physical and social infrastructure;</p> <p>d. <del>preserving</del> <u>conserving</u> or enhancing the significance of heritage assets and their settings;</p> <p>e. <u>sustainable</u>, and maintaining or enhancing sites of ecological importance;</p> <p>f. safe, secure and reduces the potential for crime;</p> <p>g. not unacceptably increasing exposure to flood risk, noise, dust, contamination, smells, waste, <del>air quality</del>, light, other forms of pollution and general disturbance or <u>detrimentally impacting on air or water quality</u>;</p> <p>h. retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features or providing appropriate additions or enhancements; and</p> <p>i. resulting in no loss of community facilities or other land/buildings for which there is an identified need.</p>	
<b>2.3</b>	<u>The Council aims to ensure that development complies with appropriate national and local planning policy and guidance through effective enforcement action. Enforcement action will be considered against unauthorised development and will be guided by national guidance and the priorities set out in the Brent Enforcement Plan which includes a test of expediency.</u>	Clarification
<b>2.7</b>	Development will be expected to provide any associated infrastructure required to make it <u>acceptable</u> accessible from a planning perspective. This includes elements such as on or <del>off</del> off-site physical infrastructure for example transport improvements, <u>water and sewerage infrastructure</u> , <del>or</del> surface water drainage or social infrastructure such as additional capacity in schools or health practices.	Clarification & Correction
<b>2.8</b>	This statutory protection also places a legal duty on the Council to seek to preserve or enhance the significance <del>of</del> of such assets and their settings.	Correction
<b>3.5</b>	Frontage will be considered peripheral where it is outside of the primary <del>shopping area (primary and adjoining or closely related secondary frontage)</del> and its conversion would not result in residential development between frontage in main town centre use.	Correction
<b>DMP 4</b>	Loss of A1, A2, or A3 uses in neighbourhood centres or isolated shop units outside designated town centres will be permitted where the centre or unit: <ul style="list-style-type: none"> <li><del>a.</del> is within 400 metres of equivalent alternative provision; <u>and</u></li> <li><del>b.</del> <u>a.</u> is unviable; or</li> <li><del>c.</del> <u>b.</u> the proposal will provide a community facility for which there is a demonstrable need.</li> </ul>	Clarification
<b>DMP 6</b>	Proposals for hotel development must be inclusive and accessible with applications for <u>detailed planning permission</u> to be accompanied by Accessibility Management Plans.	Clarification
<b>Following</b>	<u>Active Design, Sport England</u>	Clarification

<b>4.5, green national &amp; London Plan guidance box</b>		
<b>Following 4.7, green national &amp; London Plan guidance box</b>	Easy Access to Historic Buildings, English Heritage <a href="#">Historic England</a> Easy Access to Historic Landscapes, English Heritage <a href="#">Historic England</a>	To update
<b>4.15</b>	Consistent with the approach to landscaping, the design and provision of all elements, including hard and soft landscaping, lighting, furniture and public art, should be coordinated and well located, to make a positive contribution, avoid unnecessary clutter, and ensure a safe, informative and attractive environment. <a href="#">This is consistent with other parts of the Plan of making areas have better accessibility and improving streets and places for walking and cycling.</a>	Clarification
<b>4.16</b>	<a href="#">National Planning Practice Guidance (NPPG)</a> provides advice on when this is the case and the grounds on the acceptability of advertisements should be determined on the criteria of amenity and public safety.	Clarification
<b>4.20</b>	Brent’s statutory listed buildings, conservation areas and registered parks and gardens are all designated heritage assets. Its locally listed buildings, areas of distinctive residential character, sites of archaeological importance and archaeological priority areas are non-designated heritage assets. Non-designated heritage assets include buildings, structures, monuments, earthworks, street furniture, sculpture, shopfronts, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decision stage. <a href="#">Guidance on Brent’s heritage assets, as set out in the local guidance box in this chapter, is available at <a href="http://www.brent.gov.uk/conservation">www.brent.gov.uk/conservation</a>. This guidance forms part of the Local Plan evidence base and will also be a material consideration in the determination of applications for development. Applicants should refer to these documents early on to ensure that their proposals are based on an understanding of the significance of heritage assets that may affected.</a>	Clarification
<b>4.21</b>	The purpose of this policy is to provide greater clarity on the specific additional requirements applicable in Brent taking account of existing NPPF, NPPG, London Plan, and Brent Core Strategy policies <a href="#">and local evidence base</a> .	Clarification
<b>DMP 7</b>	Proposals for or concerning <a href="#">affecting</a> heritage assets should: a. demonstrate a clear understanding of the <a href="#">archaeological</a> , architectural or historic significance and its wider context; b. provide a detailed analysis and justification of the potential impact of the development on the heritage asset and its context as well as any public benefit; c. retain buildings, structures, architectural features, hard landscaping and spaces <a href="#">and archaeological remains</a> , where their	Clarification

	<p>loss of which would cause harm;</p> <p>d. sustain and enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, views, vistas, street patterns, building line, siting, design, height, plot and planform;</p> <p>e. contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, <u>and improving public understanding and appreciation.</u></p>	
<b>Following DMP 7, orange local guidance box</b>	<p><del>Heritage Asset Guidance</del></p> <p><u>Sites of Archaeological Importance and Archaeological Priority Areas</u></p> <p><u>Conservation Area Design Guides</u></p> <p><u>Conservation Area Article 4 Directions</u></p> <p><u>Heritage at Risk Register</u></p> <p><u>Listed Buildings</u></p> <p><u>Local List</u></p>	Clarification
<b>4.22</b>	<p>Brent's heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban 'Arts &amp; Crafts', 'Tudorbethan', 'Old World', Modern and Brutalist as well as planned 'village' settlements. Furthermore, its formal public gardens, cemeteries together with the trees and gardens in the 20th century residential developments have matured contributing to setting. However, its archaeological discoveries <del>from early prehistory</del> are scarce, because sites have been built over and there are limited places where archaeologists <del>could</del> <u>can now</u> investigate. <u>However, a</u> <del>Archaeological exploration</del> <u>records</u> suggests that there were settlements in the area <u>from prehistoric times. New discoveries would be significant partly because so little is known</u> during the Palaeolithic, Mesolithic and Neolithic periods (800,000 years ago to 2500 BC).</p>	Correction
<b>4.23</b>	<p>Heritage assets are valued by the public as established and tangible evidence of the past culture, providing a sense of permanence and belonging. Once lost or detrimentally altered, heritage assets cannot easily be reinstated and it is important that the most valuable are not needlessly or inadvertently destroyed. Policy DMP 7 Brent's Heritage Assets, therefore, specifically seeks to protect Brent's heritage <u>and</u> <del>seeks to</del> ensure that the case for conservation and enhancement is fully considered when assessing all proposals for new development. <del>There must also be</del> <u>The Policy also seeks to safeguard the</u> potential for further investigation on sites and buildings where the <u>heritage asset's</u> significance may <del>hitherto be acknowledged</del> and as archaeological sites become available <u>be previously undiscovered. Archaeological Priority Areas and Archaeological Sites indicate where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. However, sites of archaeological importance could be discovered elsewhere in the borough.</u></p>	Clarification
<b>4.24</b>	<p><del>4.24 The Council supports and recognises that change is necessary, but change needs to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement. Any proposal must have special regard</del></p>	Correction – duplicate

	to the desirability of preserving a heritage asset or its setting or any features of special architectural or historic interest which it possesses. When granting consent, special regard will be given to matters of detailed design, especially within main frontages, prominent elevations and roofs, and to the nature, quality and type of materials proposed to be used.	text
4.25	The Council supports and recognises that change is necessary, but change needs to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement. Any proposal must have special regard to the desirability of preserving a heritage asset or its setting or any features of special <a href="#">archaeological</a> , architectural or historic interest which it possesses. When granting consent, special regard will be given to matters of detailed design, especially within main frontages, prominent elevations and roofs, and to the nature, quality and type of materials proposed to be used. This is because some forms of development, including extensions, roof extensions, dormers and outbuildings may not be subordinate (overly dominating) a property, harming its character, integrity and appearance. It is also important to be mindful that even the most minor changes or incremental alterations such as window replacement and the loss of original fittings and features can harm the significance of a property and a heritage asset. <a href="#">Special regard will be given to proposals near or affecting heritage assets identified as at risk on Historic England's Heritage at Risk Register. The Council will use its development management and other planning powers to secure the future viable use of the borough's heritage assets. For archaeological assets, the layout of the development, extent of basements and design of foundations may need to provide for physical preservation. If significant archaeological remains are not to be preserved in-situ then appropriate investigation, analysis, publication and archiving will be required.</a>	Clarification
4.29	The Council will resist significant harm <del>to or</del> of loss of such a heritage assets. It will assess proposals which would directly or indirectly impact on heritage assets in the light of their significance and the degree of harm or loss which would be caused. Where the harm would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the significance of the conservation area. For demolition or alteration to be approved, there will need to be clarity about what will be put in its place within a suitable time frame. <del>It should be noted designation as a Locally Listed building does not provide further statutory protection but it draws attention to the special qualities of the building.</del>	Correction
4.32	A Heritage Statement <a href="#">is required where a proposal is for or affects a heritage asset. It</a> must describe and demonstrate a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance, including any contribution from their setting.	Clarification
DMP 9	Developments adjacent to the Blue Ribbon network <a href="#">and other tributaries</a> , or waterways with potential to negatively impact on its water quality will be required to contribute towards restoration and naturalisation of waterways, and seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive <a href="#">and Thames River Basin Management Plan</a> .	Clarification
5.2	<del>London Plan policy 7.17</del> Metropolitan Open Land (MOL) is given the same level of protection as the Green Belt.	Correction
5.2	Exceptions to this are where it can be clearly shown to be surplus to requirements, equivalent local provision is made <del>or the</del>	Correction

	benefit or the development is for alternative sports and recreational provision the need for which outweighs the loss.	
<b>Following DMP 9, green nation &amp; London Plan guidance box</b>	Draft-Thames River Basin Management Plan, Environment Agency	To update
<b>Following DMP 9, orange local guidance box</b>	<a href="#">Brent Biodiversity Action Plan</a>	Clarification
<b>5.11, first bullet point</b>	<a href="#">deculverting and</a> removing unnatural structures such as obsolete weirs and bank and bed reinforcements.	Clarification
<b>5.12</b>	Such developments should also contribute to the delivery of the Brent River Corridor Improvement Plan, produced by the Brent Catchment Partnership, <a href="#">Brent Biodiversity Action Plan</a> , and the London Rivers Action Plan. Specific projects in the Brent catchment are identified on the interactive map on the River Restoration Centre website.	Clarification
<b>6.2</b>	The borough's Quiet Areas, <del>as shown on the Policies Map</del> , are considered to be Fryent Country Park, open space on The Welsh Harp, Roundwood Park/Willesden New Cemetery, Paddington cemetery an Alperton Cemetery.	Correction
<b>6.11</b>	Air quality <a href="#">directly</a> adjacent the North Circular Road is very poor, therefore sensitive uses such as housing will <a href="#">generally</a> not be acceptable in this location.	Clarification
<b>6.18</b>	A general indication of the location of historic industrial sites is provided by Map 1 below. <a href="#">In accordance with DMP 1 development will not be permitted if it would lead to the future contamination of the land or elsewhere or have a detrimental impact on water quality.</a>	Clarification
<b>6.25</b>	Development proposals in flood risk zones 2 and 3, and all development proposals for sites of 1 ha or above in flood risk zone 1, should be accompanied by a Flood Risk Assessment (FRA) <a href="#">to consider all forms of flooding</a> . The borough Strategic Flood Risk Assessment (SFRA) sets out sustainable flood risk mitigation measures and level of detail to be included in site-based FRA dependant on the flood zone. This should form the basis of all FRA. <a href="#">In accordance with the SFRA all FRA should demonstrate how the development seeks to reduce flood risk.</a>	Clarification
<b>6.26</b>	<b>6.26 Surface Water</b>	Clarification

	<a href="#">6.26 Lack of capacity in our drainage network can increase flood risk, therefore developments should aim to ensure the separation of surface and foul water systems.</a>	
6.29	The developer is to provide Water Quality and Biodiversity statement and cost benefits <a href="#">analysis</a> for conventional and SuDS systems.	Clarification
7.8	Only where it is clearly demonstrated carbon reduction targets cannot be fully met on site, any shortfall may be off-set through 'Allowable Solutions' <a href="#">local carbon offsetting</a> .	Correction
7.13	Only if the feasibility study in the Energy Assessment demonstrates that all on-site options have been considered and are not feasible, will Allowable Solutions <a href="#">carbon offsetting</a> be considered. In accordance with emerging London Plan Policy 5.2 developers should actively seek to deliver their remaining Allowable Solutions <a href="#">carbon savings</a> through local carbon saving projects. Brent Council will establish a price per tonne for carbon or use a nationally recognised price such as that set by the Zero Carbon Hub, and seek payment into a local fund which will be used to deliver Brent's emerging Allowable Solutions <a href="#">carbon offsetting in the borough</a> Strategy.	Correction
8.4	The eCouncil has concentrated its efforts to date on improving key stations, interchanges and bus services to and between them. Investment has been made to increase capacity at the three Wembley stations. Similar investment is required at other key interchanges to enhance the usability of the network as a whole. Particular focus is needed on improving orbital links and key interchange points on them. <a href="#">With improved orbital bus links comes the need for bus stands and facilities, and consideration will need to be given to their location.</a>	Clarification
8.7	Where significant impacts arise <a href="#">including during development construction</a> , mitigation measures should be proposed and the residual impacts assessed.	Clarification
8.8 – second bullet point	Public transport improvements sufficient to service the scheme or to integrate it with the surrounding area. Developments attracting a significant number of trips in areas with low or moderate public transport accessibility <a href="#">or causing capacity issues to the existing network</a> will only be acceptable when significant public transport improvements are secured which are both viable and justifiable in the longer term.	Clarification
Following DMP 10, green national & London Plan guidance box	<a href="#">London Cycle Design Standards, TFL</a>	
8.21	Proposals which would affect the M1 Motorway shall require consultation with the Highways Agency <a href="#">England</a> .	To update

8.27	The amount of parking provided in accordance <u>with</u> parking standards is a balance between a number of factors. These include seeking to reduce unnecessary car trips, promoting effective use of land, making development viable and not creating on street parking pressure which undermines the quality of life.	Correction
8.28	TfL's Emerging Design of Car Parking <u>guidance</u> will also provide advice on this matter.	Correction
<b>Following 8.31, pink evidence base box</b>	<u>Brent's Parking Standards (2013), Steer Davies Gleave</u>	Correction
9.1	The NPPF and London Plan emphasise the importance of allowing sufficient flexibility to adapt to changing circumstances by supporting managed <del>conversion</del> <u>release</u> of surplus employment land.	Clarification
<b>DMP 14</b>	For developments falling under criteria a) the development shall incorporate employment uses providing high density employment on <u>approximately</u> 20% of the site <u>area</u> .	Clarification
9.4	<u>Alternatively, in exceptional circumstances</u> , where redevelopment or re-use of a Local Employment Site would not give rise to a material loss of employment, a mixed-use development incorporating non-employment uses may be appropriate <del>on part of the site</del> . The applicant must demonstrate that redevelopment will result in: <ul style="list-style-type: none"> <li>• the maximum economically feasible amount of employment floorspace on the site;</li> <li>• the accommodation of the existing employment use, or where the site is vacant employment floorspace, to meet development needs of businesses in Brent, particularly SMEs;</li> <li>• delivery of wider regeneration benefits to the community; and</li> <li>• employment floorspace with a very strong prospect of being occupied.</li> </ul>	Clarification
10.1	Further Alterations to the London Plan adopted in 2015 have subsequently increased Brent's annual housing target (including non self-contained accommodation) to a minimum of 1525 units. <u>The Borough will continue to bring forward additional housing development capacity to supplement its housing target to meet local and strategic need.</u>	Clarification
10.7	NPPF, NPPG and the London Plan give clarity that <del>the amount of affordable housing expected to be provided in a development can be reduced if the development would otherwise be unviable</del> <u>viability is a consideration when determining the maximum reasonable affordable housing.</u>	Clarification
10.8	h. priority to be accord <u>ed</u> to provision of affordable family housing.	Correction
10.11	The Council has used this approach and <u>will</u> continue to do so in the future, but will take a proportionate approach to using this mechanism. It will be applied to developments where the proportion of affordable housing agreed is significantly below the 50% target, on sites of 200 dwellings or more where there is a phased approach to the development and on sites where <del>the majority</del> <u>substantial implementation</u> of the development is likely to be delivered beyond 18 months of the initial consent.	Clarification



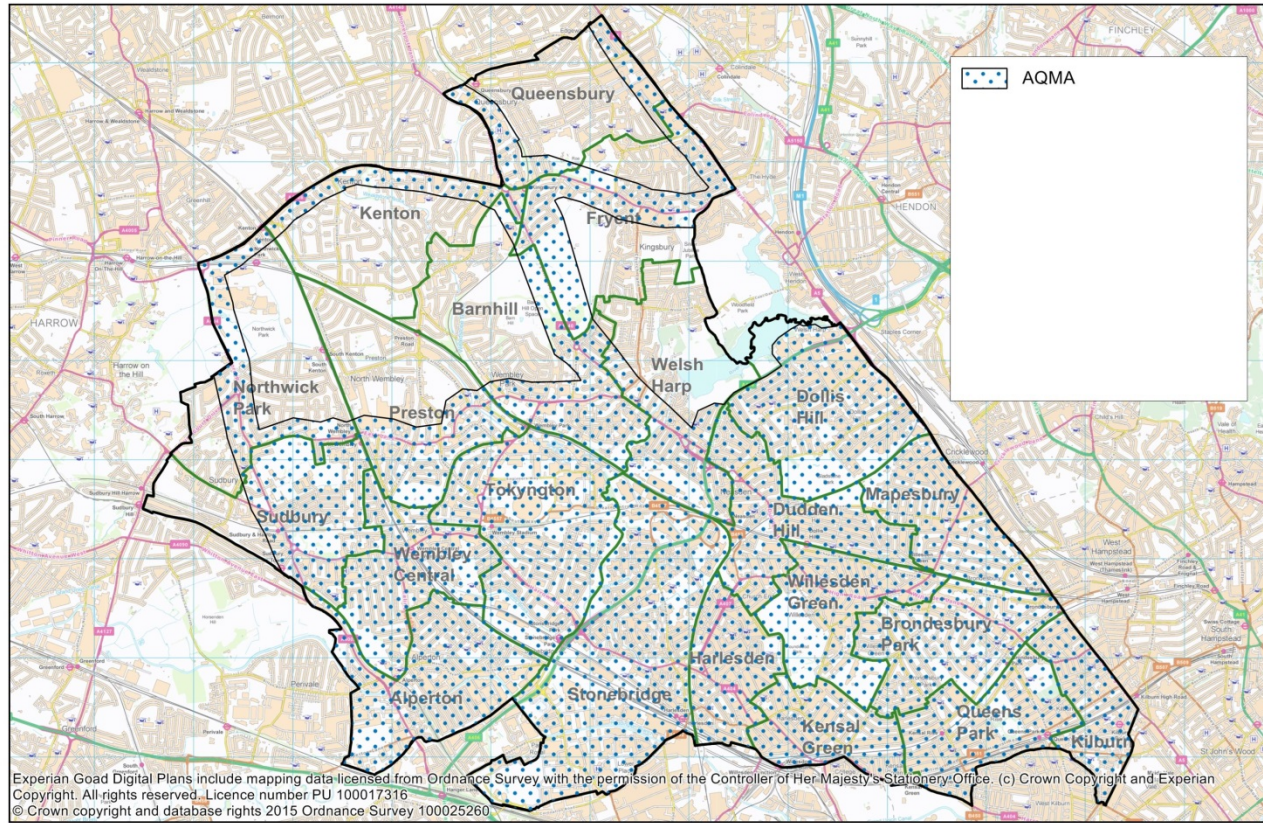
10.29	Other amenity factors will also be taken into account in deciding whether an existing family sized dwelling provides or has the potential to provide a good family environment. This will included be location and other amenity factors.	Correction
10.32	The policy seeks <u>to</u> reduce the potential for overcrowding of residential properties <del>to be controlled through means available</del> through the planning process.	Correction
DMP20	Proposals for <u>student accommodation</u> , non-self contained or self contained residential accommodation with shared facilities or on site support/care to assist residents in their daily lives will be supported where the development is: <ul style="list-style-type: none"> <li>a) located in an area with good access to public transport and other amenities, including shops (normally within 400m);</li> <li>b) is of an acceptable quality meeting appropriate standards for the needs of its occupants, including external amenity space, appropriate communal facilities, levels of support/care and mobility;</li> <li>c) includes management arrangements suitable for its proposed use and size;</li> <li>d) demonstrates that there is a specific Brent, or in the case of education a London, need for the particular use which are secured by planning agreement related to use of the land or to its occupation by members of specified educational institutions.</li> </ul> <p>The loss of accommodation will only be acceptable where:</p> <ul style="list-style-type: none"> <li>a) demonstration of no Brent need for the accommodation type, or residents’ needs can be better met by other existing accommodation; or</li> <li>b) unsatisfactory existing accommodation cannot be improved to achieve current standards</li> </ul> <p>These types of uses <del>making</del> a significant contribution to meeting local and in the case of students, London needs.</p>	Clarification
10.46	To ensure that residential accommodation meets needs over time, London Plan policy requires 10% wheelchair accessible dwellings. The accommodation covered by this policy is likely to be meeting needs of specific sectors of the population. On this basis the Council will be willing to depart from the minimum 10% wheelchair where evidence is compelling to indicate why it might not be appropriate-, <u>e.g. where occupants are less likely to suffer from mobility disabilities compared to the general population. In other forms of accommodation there could be a need for a higher proportion, e.g. disability orientated housing.</u>	Clarification
10.48	Residential amenity means both that of the potential occupiers (Brent’s private sector stock condition survey indicated the majority of HMOs <u>are</u> not suitable for habitation) and those adjoining the development.	Correction
10.51	Where appropriate it will seek to ensure that at least initially and in some cases <del>subsequent</del> for subsequent occupiers that priority for such housing is made available to people in Brent.	Correction
10.58	The London Plan anticipates that the numbers of students in London will <del>to</del> continue to grow and requires boroughs to ensure that both demonstrable local and strategic student housing needs are addressed... <del>Refer to 3.5.3 more SHLAA targets inform the 1525 gives an assumed mix on student housing provision.</del>	Correction

11.3	London Plan policy 3.16 and Brent’s Core Strategy policy CP 23 protects existing community and cultural facilities that support community participation and development, and requires mitigation for any loss. The London Plan also requires the suitability of redundant premises for other forms of social infrastructure to be assessed before alternative developments are considered.	Correction
<b>Following 11.3, green box highlighting related national &amp; London Plan guidance</b>	<p><a href="#">3.1: Ensuring Equal Life Chances for all</a></p> <p><a href="#">4.8: Supporting a successful and diverse retail sector and related facilities and services</a></p>	Clarification
11.8	As such, and in keeping with the NPPF, public houses are classed as social infrastructure and proposals which would result in their loss will be subject to this policy. <a href="#">In addition, due to the contribution public houses make to the borough’s local character and distinctiveness, policy DMP7 Brent’s Heritage Assets will normally apply.</a>	Clarification
<b>DMP 21</b>	<p>The Council will support the loss of public houses <a href="#">only</a> where:</p> <p><a href="#">ba)</a> its continued use is not economically viable <a href="#">as demonstrated by meeting the marketing requirements in paragraph 11.9;</a></p> <p><a href="#">eb)</a> the proposed alternative use will not detrimentally affect the <a href="#">character and</a> vitality of the area and <a href="#">will</a> retain as much of the building’s defining external fabric and appearance as a pub as possible; <del>and</del></p> <p><a href="#">ec)</a> the proposal does not constitute the loss of a service of particular value to the local community; <a href="#">and</a></p> <p><a href="#">ad)</a> <a href="#">if registered as an Asset of Community Value the premises can be shown to have been offered for sale to local community groups and no credible offer has been received from such a group at a price that is reflective of the condition of the building and its future use as a public house. The Council will treat registration as an Asset of Community Value as a material planning consideration.</a></p>	Clarification
<b>11.9, fifth bullet point</b>	there has been <a href="#">public</a> consultation <a href="#">to ascertain the value of the public house to</a> <del>with</del> the local community;	Clarification
<b>Appendix 1</b>	<i>Table numbers to be corrected throughout.</i>	Correction

**Appendix 3** Major Developments: 10 or more residential units (or if a number is not given, where the area is more than 0.5 hectares), or Correction  
1000 sq m (or more) gross commercial floorspace.

Open Space: All land in Brent that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a the broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Primary Shopping Area: Area where retail development is concentrated comprising the primary and adjoining secondary frontages.



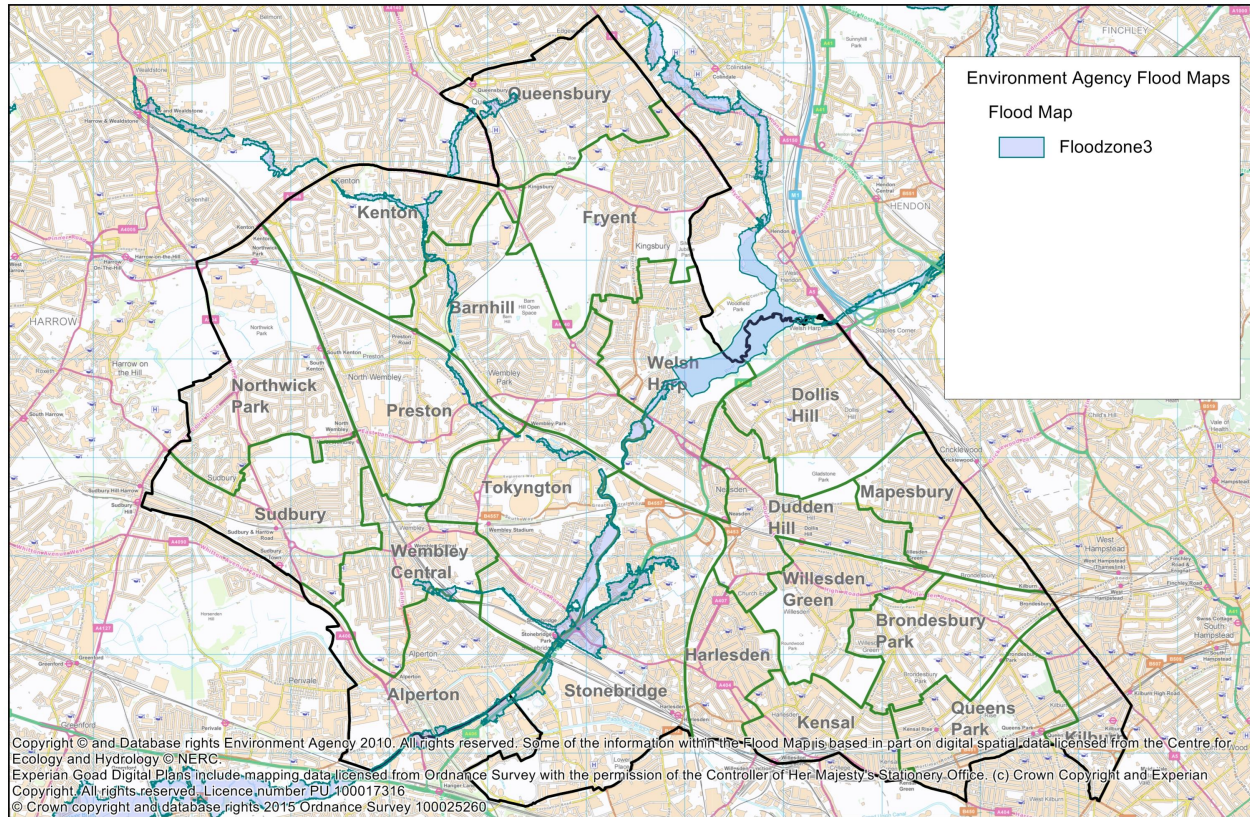
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