Agenda Item	6.5	
Report No	PLS-50-23	

HIGHLAND COUNCIL

Committee:	South Planning Applications Committee	
Date:	23 August 2023	
Report Title:	23/01607/LBC: Network Rail	
	Kingussie Railway Station, Ruthven Road, Kingussie PH21 1EN	
Report By:	Area Planning Manager – South	

Purpose/Executive Summary

- **Description:** Installation of footbridge with associated lifts and removal of existing footbridge
- Ward: 20 Badenoch and Strathspey

Development category: Local

Reason referred to Committee: Community Council objection and more than 5 neighbour objections, Local Member referral.

All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

Recommendation

Members are asked to agree the recommendation to **REFUSE** the application as set out in section 11 of the report.

1. PROPOSED DEVELOPMENT

- 1.1 The proposal is to replace the existing railway footbridge at the railway station in Kingussie with a new footbridge in the same general location, with a lift either side to provide a fully accessible connection to both platforms. The existing footbridge is a key part of the B-listed station group, a decorative cast-iron structure of a scale and form which complements the heritage group. The proposed bridge is a significantly larger and bulkier structure, particularly with the lift-towers to either side. The steel structure is 20.7m wide overall, 14.96m clearance between stairways and 4.1m clearance height above platform level with 6.1m to top of balustrade; the lift towers are 3.1m wide by 3,4m deep, 8.45m/8.8m high to eaves/ridge of the mono-pitch roof. Infill panels to both towers and bridge will have a lattice-feature to reflect the existing bridge's detailing.
- 1.2 The proposed bridge would be built-on and accessed from the existing station platforms, which would also need to be extended eastwards.
- 1.3 Pre-Application Consultation has been held by Network Rail with officers and Historic Environment Scotland; this was assessing the impacts upon the existing listed buildings, positioning and the new design.
- 1.4 Supporting Information: 3D bridge images; Assessment of Significance; Design, Access and Heritage Statement.
- 1.5 Variations: None
- 1.6 It should be clarified at the start of this report that a Listed Building Consent (LBC) cannot consider issues of neighbouring residential amenity, such as over-looking, loss of privacy and impacts on daylight or sunlight within. An LBC can only assess matters which directly affect the built heritage of the site.

2. SITE DESCRIPTION

2.1 The site is at the eastern ends of the station platforms, and at the northern side it is in front of the original Station House; this house is on the First Edition mapping (1868), next to the original station buildings, which were replaced in 1894. The 'new' station complex is B-listed, which includes the rear 2-storey wing which Historic Environment Scotland (HES) refer to as 'Station House'; the original Station House is not included in the statutory listing, which has been confirmed by HES. However, we consider the original house to be 'curtilage listed' to the Station, which gives it similar statutory protection. The criteria for curtilage listing are: 1) any building or structure constructed pre-1948; 2) historically associated with the main listed building; 3) in the same ownership at the time of listing; 4) not divided by later development such as roads. The original Station House complies with all four criteria.

On the southern side of the platforms the proposal will be close to the B-listed signalbox, and close to the garden boundary with Station Cottages No.s 6, 7, 8 and 9.

2.2 The Station was B-listed on 05.10.1971, LB36282. Listing description: William Roberts for Highland Railway, dated 1894. Long single storey S facing range on down platform linked to 2-storey station house at rear. Coursed grey rubble,

contrasting tooled ashlar sandstone dressings. 20-bay frontage to platform with transomed bipartite and tripartite windows; deep 5-bay canopy supported by castiron columns with decorative brackets shelters E half of platform front (valences gone). 2 crowstepped entrances to rear.

STATION HOUSE: to rear; 3-bay with off centre door flanked by narrow window; paired windows in centre bay; long short detailing to windows and angles. 2- and 4-pane glazing throughout; end and ridge corniced stacks; crowstepped gables; slate roofs.

FOOTBRIDGE: (Map Ref: NH 75667, 00414): 1894, Highland Railway Company. Cast-iron footbridge with lattice balustrade; 2 lamp standards adapted to electric light.

SIGNAL BOX: (Map Ref: NH 75688, 00412): Mackenzie and Holland for Highland Railway, 1894 (extended 2007). Plank and strip weather-boarded rectangular signal box. 4-pane glazed windows to locking room. Signal cabin reached by metal forestair (originally of timber construction). Continuous fenestration to operating room with 4-pane glazing to track frontage, returning to gables. Projecting eaves and timber barge-boarding. Large extension to original half gabled porch extended to west by Network Rail in 2007, supported on metal frame. Original slate roof and timber forestair replaced in the early 1970s.

Statement of Special Interest: Kingussie is a substantial, well-detailed example of a late 19th century Highland Railway station and station house complex with associated footbridge and signal box.

3. PLANNING HISTORY

3.1	09.05.2017	17/00873/LBC Alterations to raise station platform 2 and install handrail	Listed Building Consent Granted
3.2		23/01753/PNO Erection of accessible bridge	Prior approval to be refused
3.3		23/03010/LBC Erection of accessible bridge, with associated lifts and removal of existing footbridge	•
3.4		23/03067/PNO Erection of accessible bridge, with integrated lifts, connecting both platforms	
4			

4. PUBLIC PARTICIPATION

4.1 Advertised: Listed BuildingDate Advertised: 28.04.2023Representation deadline: 19.05.2023

Timeous representations: 14

Late representations: 5

- 4.2 Material considerations raised are summarised as follows:
 - a) Station Master's House not considered as 'listed' by the Heritage Statement
 - b) Impacts on the setting of the listed buildings
 - c) Submitted 3D renders do not accurately show other buildings adjacent the site
 - d) No public consultation or pre-notification to adjacent properties
 - e) The existing footbridge should be raised and extended/altered
- 4.3 All letters of representation are available for inspection via the Council's eplanning portal which can be accessed through the internet <u>www.wam.highland.gov.uk/wam</u>.

5. CONSULTATIONS

5.1 **Kingussie and Vicinity Community Council:** Object

1. Listed Building Status: Station House is a category B listed building which has been given no consideration in the application. Network Rail is comfortable to "protect the character and appearance of the listed station at Kingussie" but clearly not the character and appearance of Station House also a listed building.

2. Residential Amenity: No consideration by the applicant has been given to the distance from the front door of Station House to the proposed building - less than 2m. No consideration has been given to the residents of the whole area in terms of noise. No consideration has been given to the residents of Station House in terms of loss of light and privacy. Network Rail is happy to site the bridge "at a location that does not obscure or otherwise adversely impact on the principal south facing Station Buildings" yet is happy to site it directly in front of a Category B listed residential building.

It has been noted that other options have been explored and rejected by Network rail. Kingussie and Vicinity Community Council would like to see this option firmly rejected and others explored further, particularly siting this building at the west end of the station. (further comments from Kingussie and Vicinity Community Council are included in Appendix 1)

- 5.2 **CNPA:** No call-in
- 5.3 **Historic Environment Scotland:** "We have been involved in detailed discussions with your Council and the applicant, Network Rail, about design options for new accessible footbridges at historic train stations.

In principle, we accept the justification for new accessible footbridges as these are required to improve public access to stations. We also welcome the design of the new footbridge.

However, the proposals would require the existing category B listed lattice footbridge at Kingussie to be demolished. If demolition is accepted, it should be subject to a detailed recording exercise if this has not already taken place. Subject to condition, the opportunity should also be taken to relocate and reuse the footbridge, and/or salvage any elements of the footbridge structure capable of re-use elsewhere."

[It should be noted that the HES consultation on the subsequent application, 23/03010/LBC, requires the retention of the existing footbridge as its removal is not necessary for the new bridge's alternative location]

6. DEVELOPMENT PLAN POLICY

- 6.1 National Planning Framework 4 (NPF4) was adopted on 13 February 2023. The policies within it form part of the Development Plan and are material to the consideration of this application, alongside the Cairngorms National Park Local Development Plan 2021 and should, where there is conflict between policies, be afforded greater weight in decision making given that it is the most recent statement of planning policy.
- 6.2 The following policies are relevant to the assessment of the application:

6.3 National Planning Framework 4 (NPF4) February 2023

Policy 7 - Historic assets and places

6.4 **Cairngorms National Park Local Development Plan (2021):**

Policy 3: Design and Placemaking Policy 9: Cultural Heritage Kingussie Strategic Settlement

6.5 **Cairngorms National Park Guidance:**

Policy 3 – Sustainable Design Non-Statutory Guidance

Policy 9 - Cultural Heritage Non-Statutory Guidance

7. OTHER MATERIAL POLICY CONSIDERATIONS

7.1 Historic Environment Policy for Scotland (HEPS) May 2019

Historic Environment Scotland Circular (April 2019)

Historic Environment Scotland – Managing Change in the Historic Environment Guidance Note Series

8. PLANNING APPRAISAL

- 8.1 Section 25 of the Town and Country Planning (Scotland) Act 1997 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires the planning authority to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Determining Issues

8.3 This means that the application requires to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance and all other material considerations relevant to the application.

Planning Considerations

- 8.4 The key considerations in this case are:
 - a) compliance with the development plan and other planning policy
 - b) the impacts on the listed buildings and their setting
 - c) the impacts upon the setting of the curtilage listed building (Station House)
 - d) any other material considerations

Development plan/other planning policy

- 8.5 The newly adopted NPF4 also sets out detailed criteria for protecting the historic environment. Policy 7c) which relates to historic assets and places requires that development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.
- 8.6 CNPA Policy 3, requires that development be sympathetic to the traditional character, vernacular and distinctiveness of the surrounding area, while encouraging innovation in design and use of materials. Alterations to building stock should respect the design, massing, proportions, materials and general visual appearance of the area (as well as the building's setting).
- 8.7 CNPA Policy 9, requires that development should preserve the special qualities of the building and enhance its character and the contribution it makes to the cultural heritage of the National Park, and apply design and materials appropriate to its character and appearance.
- 8.8 Subject to the ability of a proposal to demonstrate that it will not harm the character, special architectural or historic interest and setting then the proposal would comply with the development plan.

Impacts on the listed buildings and their setting

8.9 The listed Station group comprises the Station building, the footbridge and the signal box; this grouping is best appreciated from the station platforms (particularly the southern) and from outwith the site, at the level-crossing on Station Road (B970) to the east. The platforms themselves are considered to be a constituent part of the listed group, thus the proposed new bridge requires LBC; the significant impact that the proposed bridge would have upon the listed group, would require LBC regardless. The new bridge is proposed on the site of the existing, extending to its east (as it is much larger); this is effectively central to the listed group, between the station-building and the signal-box. As a significantly larger bridge, with a bulky lift-tower to either side, this will be visually obtrusive and over-dominant within this sensitive context. Whether viewed from the platforms or from Station Road, the new bridge will predominate and overwhelm the heritage context of listed structures. This impact upon the listed group, as well as upon their setting, is considered to be both significant and adverse; as such, its negative impacts cannot be supported.

8.10 The most significant direct impact upon the listed building is the proposed removal of the existing footbridge. This, as noted above, is a key constituent part of the listed group. The removal of this footbridge has been justified by the applicant as necessary for the future electrification of the Perth - Inverness railway line, for which the existing bridge does not provide adequate height clearance or public safety. The applicant has also stated that they do not have funding to maintain a second footbridge at the station. At the time of application, there is no defined or confirmed timetable for the electrification project, which may never be implemented (and may indeed be over-taken by other technologies). It is therefore not considered acceptable to remove the existing heritage bridge for an installation which may never actually take place, thus losing a key part of the listed group for the 'convenience' of the rail operator. It is considered that this removal is unjustifiable, until such time as the electrification project is actually confirmed, scheduled and contracted.

Impacts upon the setting of the curtilage listed building (Station House)

8.11 Station Master's House was not considered as 'listed' by the submitted Heritage Statement. As noted in section 2.1 above, it is considered that the original Station House is curtilage-listed to the Station group. This is a fundamental issue for the assessment of this proposal. The positioning of the proposed bridge, so close to the Station House, is entirely adverse and obtrusive, where the bridge and its lift-towers will dominate the setting of Station House; the negative impacts upon the character and integrity of the historic house will be overwhelming and therefore cannot be supported.

Other material considerations

- 8.12 The submitted 3D renders do not accurately show other buildings adjacent to the site, and in fact do not show the original Station House at all. The submitted information is therefore inaccurate and misleading.
- 8.13 The question of whether the existing footbridge could potentially be raised and extended/altered was raised in the consultee responses. It would always be preferable to retain and reuse historic fabric and structures; this option has not been fully explored by the applicant, but it is accepted that this would be highly complicated and would ultimately compromise the historic structure.

There are no other material considerations.

Non-material considerations

- 8.14 The issue of over-looking/loss-of-privacy, impacts upon daylight or sunlight, or impacts on neighbouring amenity are not material planning considerations for this Listed Building Consent. Another neighbour questioned the impact upon existing sewers adjacent the site.
- 8.15 No public/community consultation or pre-notification to adjacent properties was carried-out by the applicant; as a significant development by a public-body, this lack of local engagement is highly unfortunate and lacking in transparency/inclusivity.

Matters to be secured by Legal Agreement / Upfront Payment

8.16 None

9. CONCLUSION

- 9.1 The proposal is for the removal of the existing (B-listed) footbridge and its replacement with a larger structure, incorporating a lift at either side. The increased scale of the new bridge takes the overall footprint further to the east than the existing.
- 9.2 While the principle of providing full and equal access to both platforms is supported, the impacts upon the listed group, as well as on the curtilage-listed Station House, are significantly adverse. The associated removal of the existing listed footbridge is a significant loss of a historic structure which is neither justifiable nor accepted. As such, the proposal will not preserve the special architectural or historic character of the Listed Building and is, therefore, considered contrary to both national and local plan policy. Accordingly, the proposal cannot be supported.
- 9.3 All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

10. IMPLICATIONS

- 10.1 Resource: Not applicable
- 10.2 Legal: Not applicable
- 10.3 Community (Equality, Poverty and Rural): Not applicable
- 10.4 Climate Change/Carbon Clever: Not applicable
- 10.5 Risk: Not applicable
- 10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before decision issued	Ν
Notification to Scottish Ministers	Ν
Conclusion of Section 75 Obligation	Ν
Revocation of previous permission	Ν

Subject to the above actions, it is recommended to **REFUSE** the application for the following reasons

1. The location of the proposed new footbridge, within the B-listed Station group, will have a significantly adverse impact on the group's historic character,

appearance and integrity. The proposal therefore does not comply with Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997; Policy 7c of National Planning Framework 4; as well as Policies 3 and 9 of the Cairngorms National Park Local Development Plan (2021).

- 2. The impact upon the curtilage-listed Station House and its setting will have a significantly adverse impact upon its historic character and appearance. The proposal therefore does not comply with Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997; Policy 7c of National Planning Framework 4; as well as Policies 3 and 9 of the Cairngorms National Park Local Development Plan (2021).
- 3. The removal of the existing footbridge, which along with the Station and signal-box form a complete Highland station-grouping, is unacceptable and unjustifiable loss of historic fabric. The proposal therefore does not comply with Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997; Policy 7c of National Planning Framework 4; as well as Policies 3 and 9 of the Cairngorms National Park Local Development Plan (2021).

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that the proposal does not accord with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

Signature:	David Mudie			
Designation:	Area Planning Manager - South			
Author:	Norman Brockie			
Background Papers:	Documents referred to in report and in case file.			
Relevant Plans:	Plan 1 - S2022-098-DRG-CIV-001 Rev.P04 Location Plan, Block Plans			
	Plan 2 - S2022-098-DRG-CIV-002 Rev.P03 Plan and Elevations			
	Plan 3 - 3D Rendered Images			

Appendix 2: Kingussie and Vicinity Community Council (further comments)

"The Blackstock family of Station House Kingussie received the first news of these applications via the local press and not via Network Rail or any other statutory body. This is also true of the residents to the south of the station and wholly inappropriate. The maps and elevation drawings associated with this application do not even acknowledge the existence of Station House.

The current Station Buildings are regularly and incorrectly referred to as Station House. The concept schematics do not acknowledge the existence of Station House Network Rail's own Heritage Statement shows incorrectly the existence of Station House as being built c1940.

That same statement identifies Station House clearly on the maps published by Ordnance Survey in 1892 following a survey in 1868. It also shows on a map published in 1901.

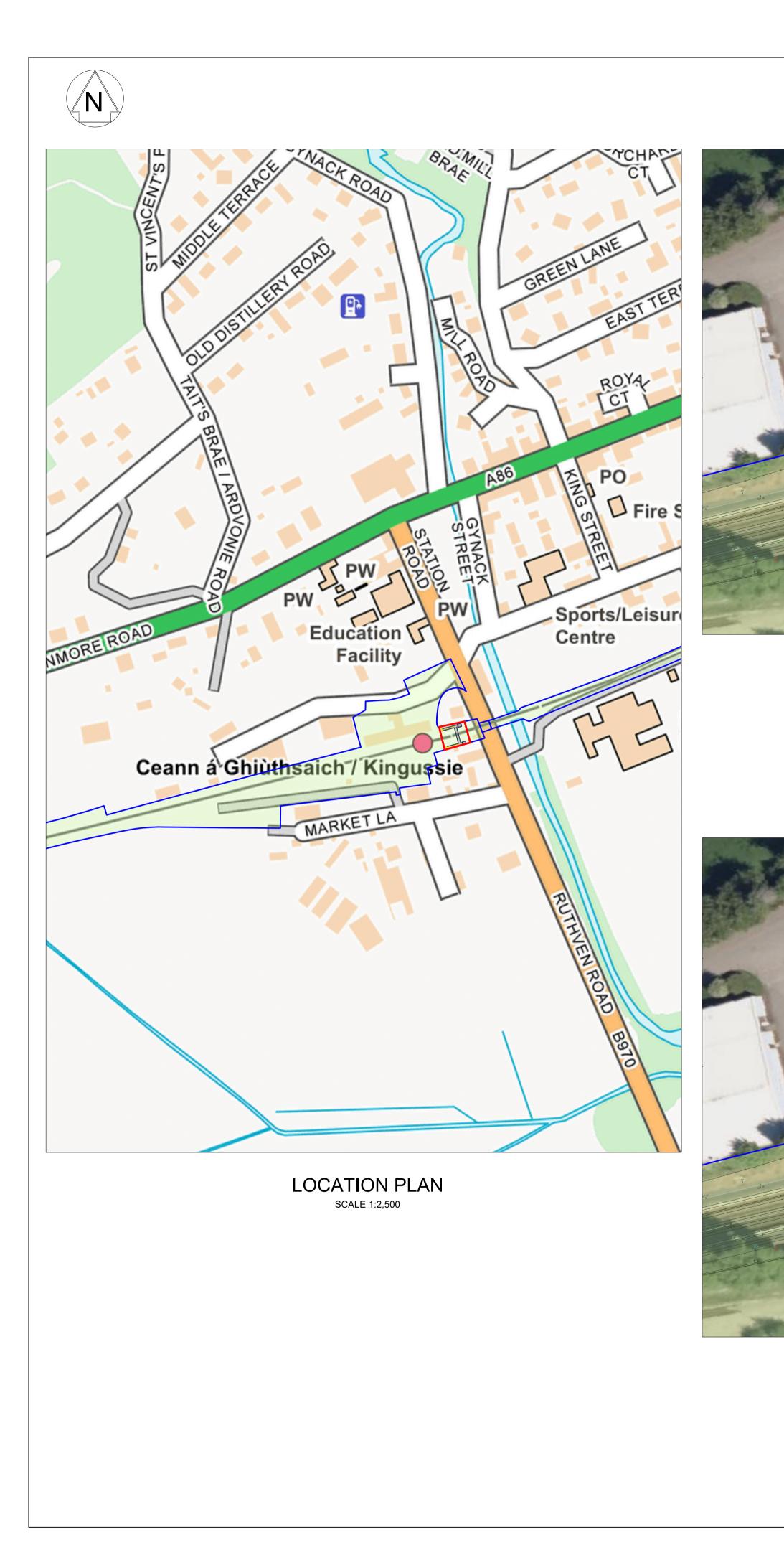
There is no acknowledgement of Station House as being a Category B listed building.

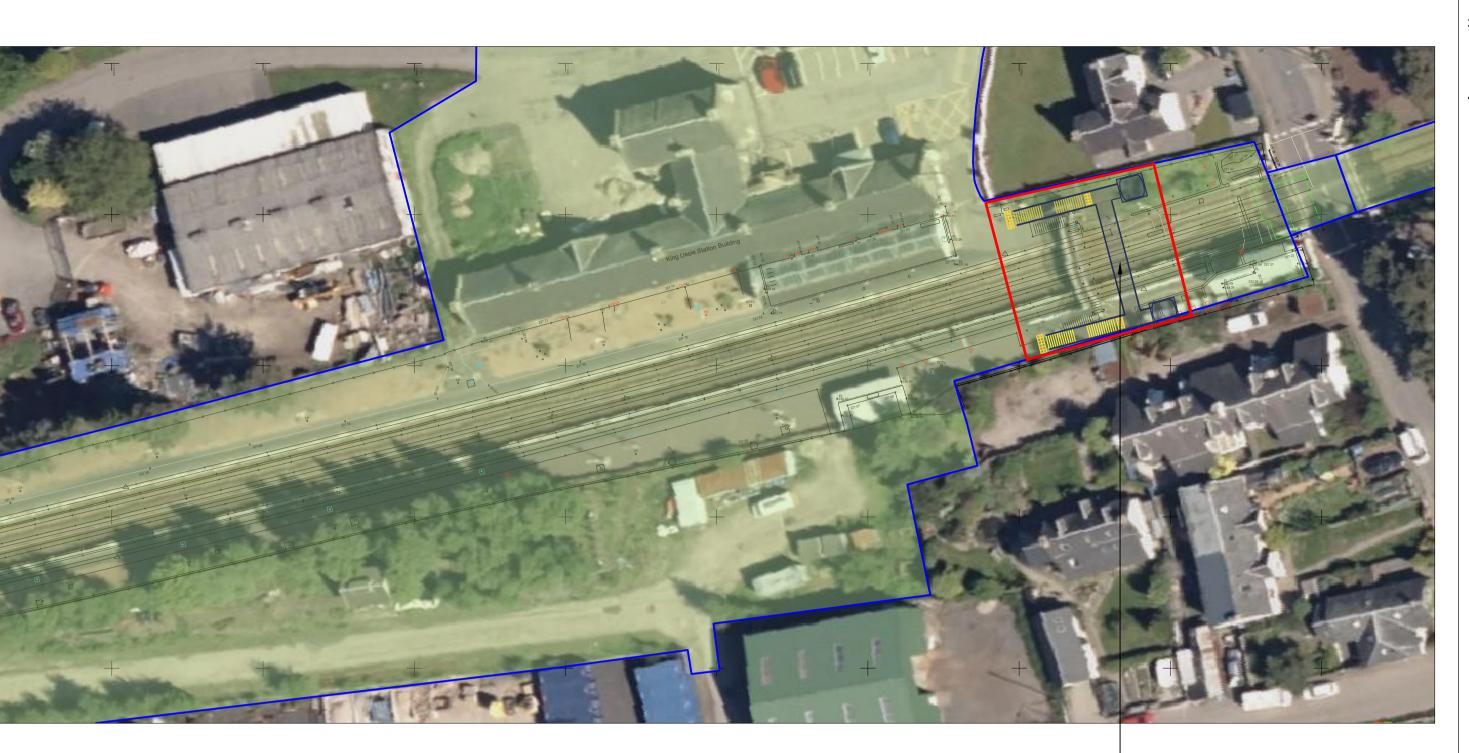
Network Rail has stated that the new crossing should be empathetic to the surrounding buildings and be of an appropriate and sympathetically recessive colour scheme", shown on the schematics as a large dark grey structure of modern building materials.

It has been noted that other access options have been explored and rejected by Network Rail. Kingussie and Vicinity Community Council would like to see these explored further, particularly siting this building at the west end of the station. Locating the bridge further down the platform would be no inconvenience to customers. Currently there is a considerable walk beyond the Station Buildings to access trains particularly the London train. Few trains are accessed from the southbound platform for which this crossing and distress to the Blackstock family seems excessive. The idea that crossing the railway at the level crossing is dangerous is concerning as this is in fact the only way to cross currently.

It is also interesting to note that Network Rail describes the current footbridge over the railway linking Kingussie High School to Spey Street as being at the west of the station when it is in fact to the east.

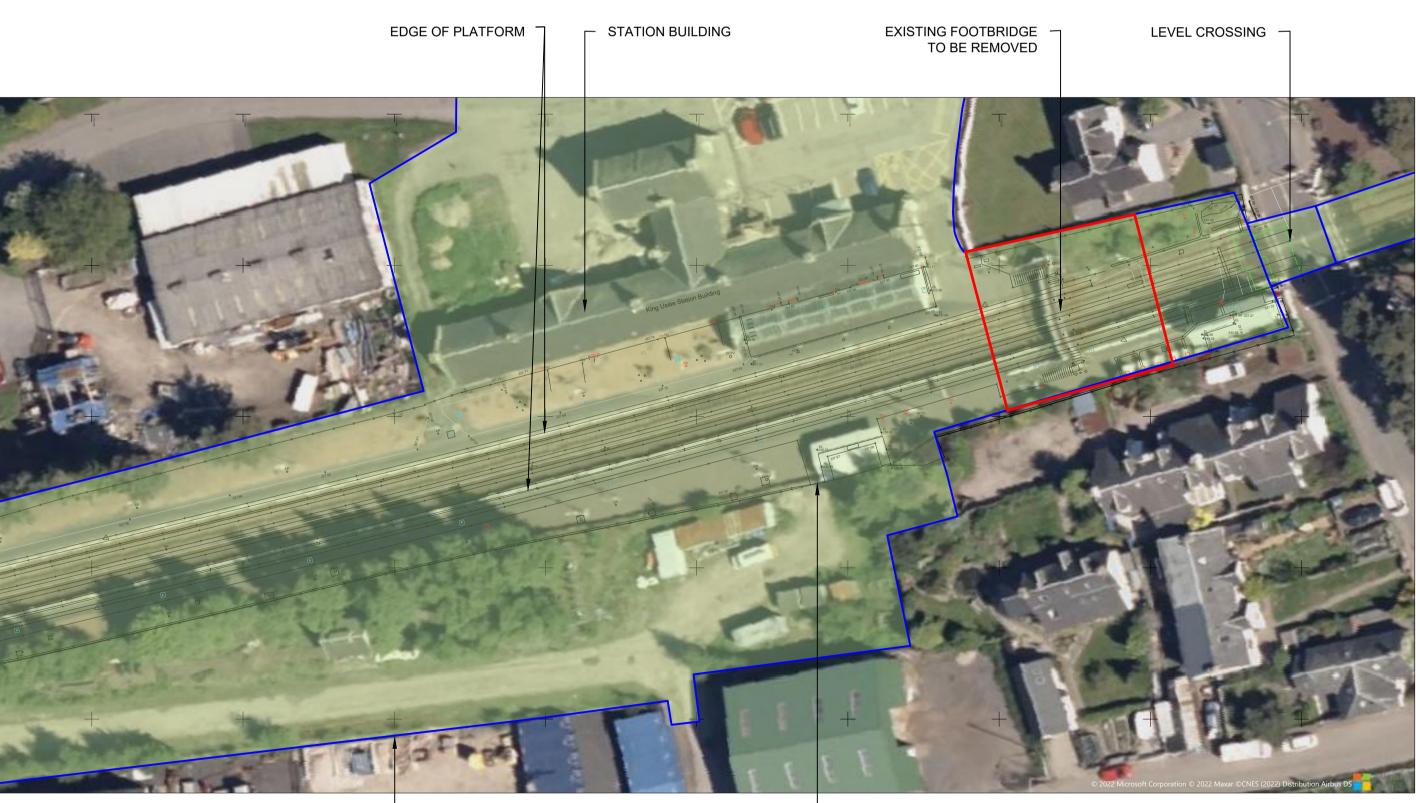
We also note that all statutory bodies were consulted but Network Rail did not choose to engage with the local community. Once again evidence of statutory bodies not working with communities."





PROPOSED BLOCK PLAN SCALE 1:500

PROPOSED BRIDGE LOCATION -



NETWORK RAIL BOUNDARY —

EXISTING BLOCK PLAN SCALE 1:500

^{20m} Scale 1:500 10m

GENERAL NOTES

- 1. DO NOT SCALE FROM THIS DRAWING.
- 2. ALL DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE.
- SHOULD THERE BE ANY DISCREPANCY BETWEEN DETAILS INDICATED ON THIS DRAWING AND THOSE INDICATED ON OTHER DRAWINGS THE ENGINEER SHOULD BE INFORMED
- PRIOR TO CONSTRUCTION ON SITE. UNTIL TECHNICAL APPROVAL HAS BEEN OBTAINED FROM THE RELEVANT AUTHORITIES IT SHOULD BE UNDERSTOOD THAT ALL DRAWINGS ISSUED ARE PRELIMINARY AND NOT FOR CONSTRUCTION. SHOULD THE CONTRACTOR START SITE WORK PRIOR TO APPROVAL BEEN GIVEN, IT IS ENTIRELY AT THEIR OWN RISK.



P04	28.03.23	23 NETWORK RAIL BOUNDARY LINE COLOUR REVISED		NM	DG
P03	08.03.23 PROPOSED LOCATION REVISED		BP	NM	DG
P02	17.02.23	02.23 FIRST ISSUE		NM	DG
P01	16/01/23	16/01/23 DRAFT ISSUE			DG
Rev	Date	Description of Revisions	Drawn	Chkd	Appr



30m





Derwent House RTC Business Park, London Road, Derby, DE24 8UP

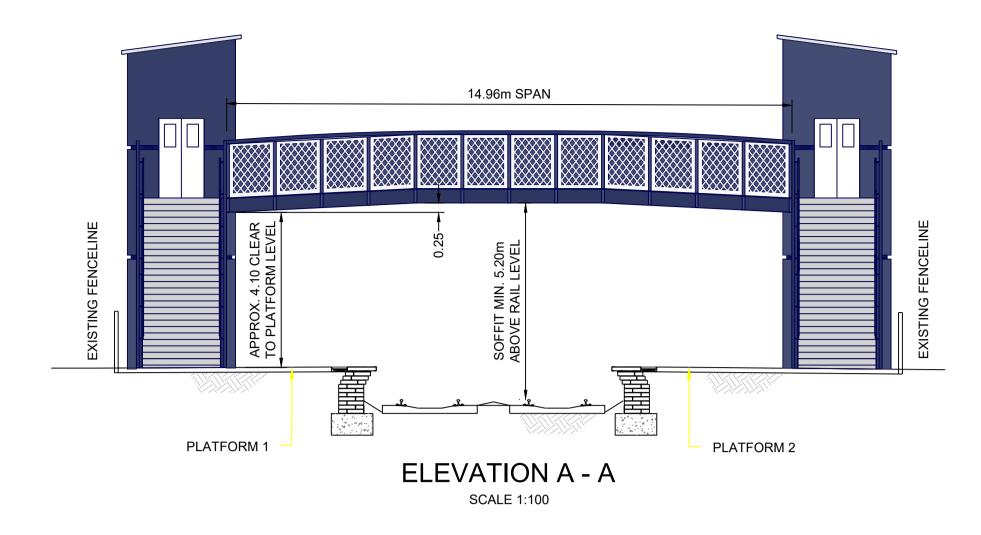
Tel: 0115 939 3617 E-mail: enquiries@engineeringcsl.com

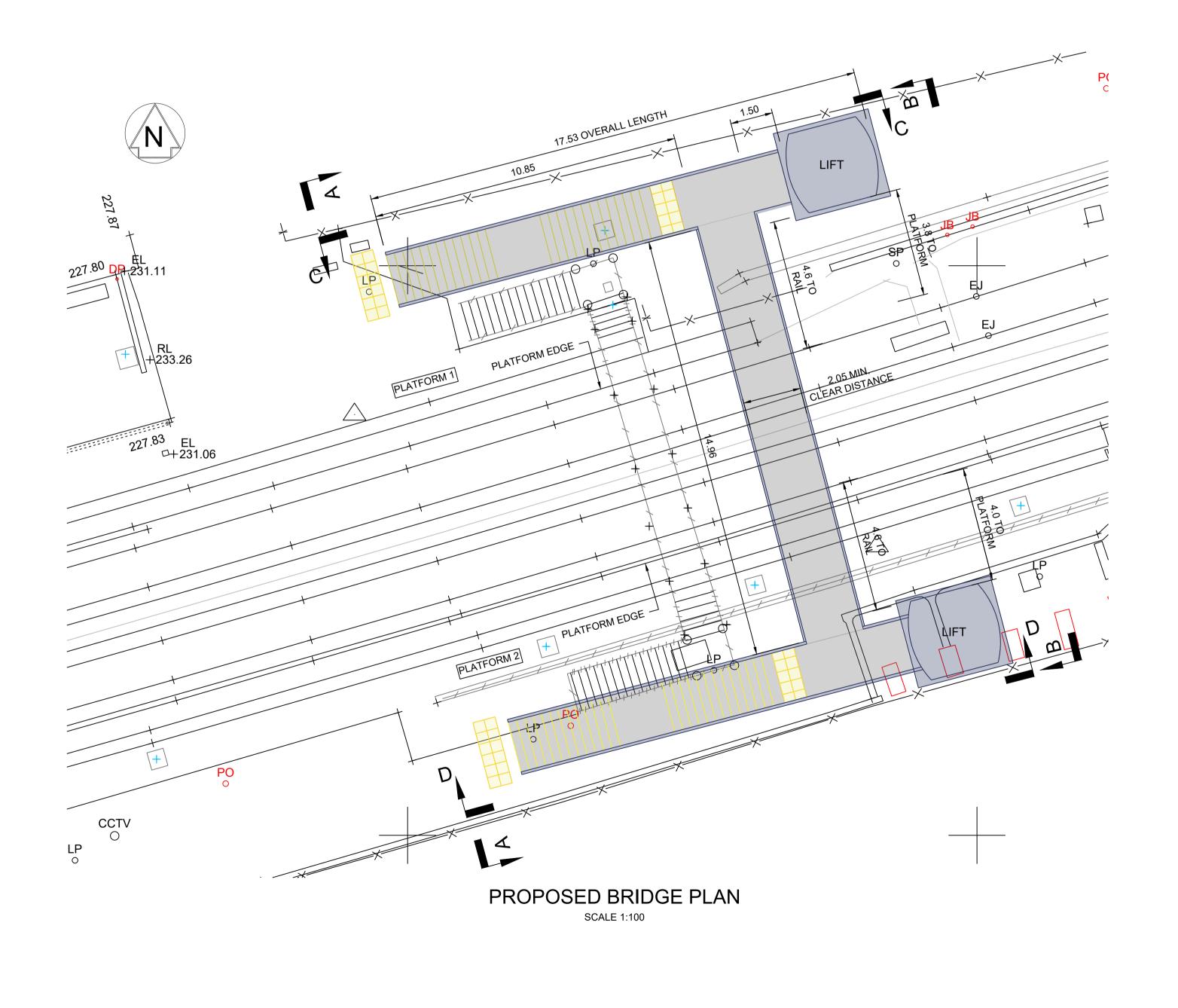
KINGUSSIE STATION FOOTBRIDGE REPLACEMENT SCHEME

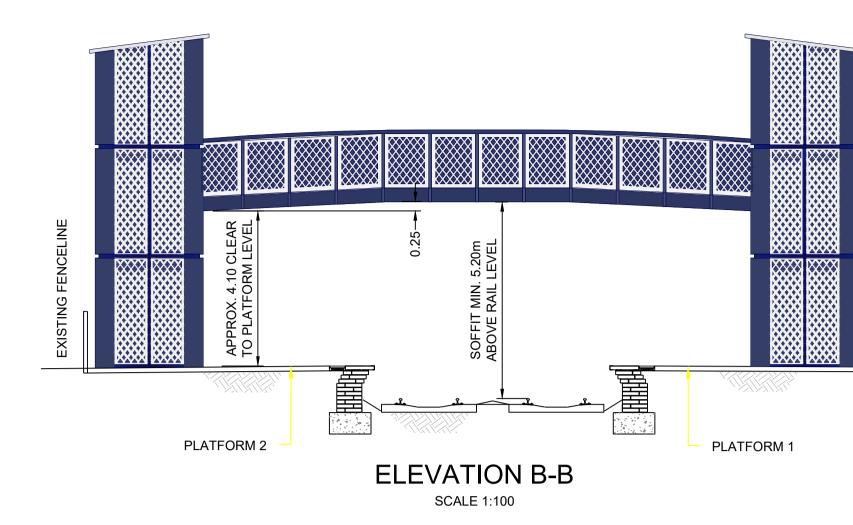
SITE LOCATION PLAN AND EXISTING AND PROPOSED BLOCK PLANS

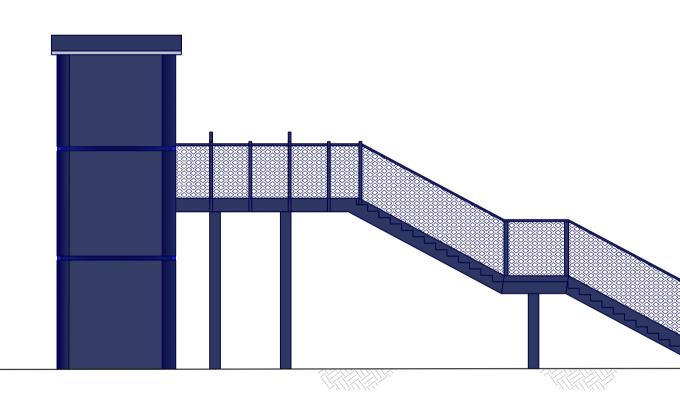
Drawing Title

Designed	D.GENT	Signed	Date 28.03.23	
Drawn	B. PEARSON	Signed	Date 28.03.23	
Checked	N. MARSHALL	Signed	Date 28.03.23	
Approved	D. GENT	Signed	Date 28.03.23	
Scale(s)		ELR & Mileage		
	AS SHOWN	HGL2 71 Mil	es,43 Chains	
Alternative	Alternative Reference			
N/A			1 of 1	
Drawing Number Revision				
S2022-098-DRG-CIV-001 P04				

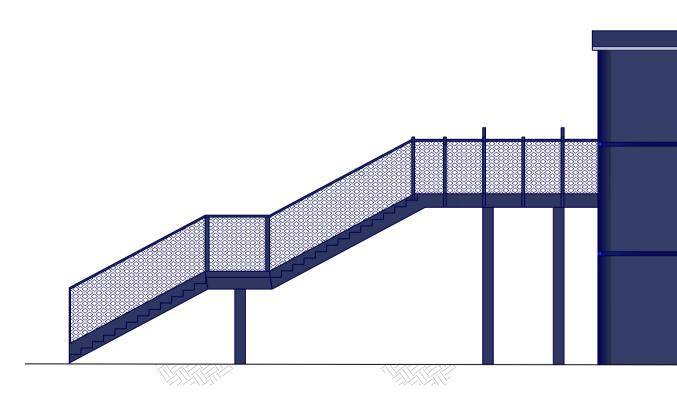












ELEVATION D - D SCALE 1:100 GENERAL NOTES

1. DO NOT SCALE FROM THIS DRAWING.

- 2. ALL DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE.
- 3. SHOULD THERE BE ANY DISCREPANCY BETWEEN DETAILS INDICATED ON THIS DRAWING AND THOSE INDICATED ON OTHER DRAWINGS THE ENGINEER SHOULD BE INFORMED PRIOR TO CONSTRUCTION ON SITE.
- 4. UNTIL TECHNICAL APPROVAL HAS BEEN OBTAINED FROM THE RELEVANT AUTHORITIES IT SHOULD BE UNDERSTOOD THAT ALL DRAWINGS ISSUED ARE PRELIMINARY AND NOT FOR CONSTRUCTION. SHOULD THE CONTRACTOR START SITE WORK PRIOR TO APPROVAL BEEN GIVEN, IT IS ENTIRELY AT THEIR OWN RISK.
- 5. THE FOLLOWING STANDARDS AND DESIGN GUIDANCE DOCUMENTS WILL BE USED FOR THE GEOMETRIC DESIGN OF THE LEGACY FOOTBRIDGE AND LEGACY VISION FOOTBRIDGE. THE DOCUMENTS PRINCIPALLY COVER THE LAYOUT AND AESTHETICS OF THE FOOTBRIDGES FOR INCLUSIVITY BY ALL POTENTIAL USERS AT THE STATION:
- DESIGN STANDARDS FOR ACCESSIBLE RAILWAY
- STATIONS, V04 DEPARTMENT FOR TRANSPORT
- CD 353 DESIGN CRITERIA FOR FOOTBRIDGES
- 6. THE FOLLOWING STANDARDS AND DESIGN GUIDANCE DOCUMENTS WILL BE USED FOR THE STRUCTURAL DESIGN OF THE LEGACY FOOTBRIDGE AND LEGACY VISION FOOTBRIDGE:
- BS EN 1993-1-1 GENERAL RULES AND RULES FOR BUILDINGS
- BS EN 1993-1-1 UK NA PUBLISHED ON DEC 2008
- BS EN 1991-1-1 GENERAL RULES
- BS EN 1991-1-1 UK NA GENERAL RULES
- BS EN 1993-2 BRIDGES (FOR GUIDANCE ONLY)
- BS EN 1993-2 UK NA BRIDGES (FOR GUIDANCE ONLY)PD 6695-2 DESIGN OF BRIDGES
- SCI P185 BEST PRACTICE IN BRIDGE DESIGN
- CD 368 DESIGN OF FIBRE REINFORCED POLYMER BRIDGES AND HIGHWAY STRUCTURES
- NR/L3/CIV/020 DESIGN OF BRIDGES
- CIRIA C779 FIBRE REINFORCED POLYMER BRIDGES

TO BE REPRODUCED IN COLOUR

P03	08.03.23	PROPOSED LOCATION REVISED	BP	NM	DG
P02	17.02.23	FIRST ISSUE	AG	NM	DG
A01	16.01.23	DRAFT ISSUE	NM	-	DG
Rev	Date	Description of Revisions	Drawn	Chkd	Appr
Status					







KINGUSSIE STATION FOOTBRIDGE REPLACEMENT SCHEME

Drawing Title

FOOTBRIDGE DECK STRUCTURE GENERAL ARRANGEMENT

Designed	D.GENT	Signed	Date 08.03.23		
Drawn	B.PEARSON	Signed	Date 08.03.23		
Checked	N. MARSHALL	Signed	Date 08.03.23		
Approved	D. GENT	Signed	Date 08.03.23		
Scale(s)	Scale(s) AS SHOWN ELR & Mileage HGL2 71 Miles,43 Chains				
Alternative	Reference		Sheet		
	1 of 1				
Drawing Number Revision					
S202	S2022-098-DRG-CIV-002 P03				

XISTING FENCELINE