

Agenda Item	6.2
Report No	PLS 051/17

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 19 September 2017

Report Title: 17/03279/FUL: Marine Harvest (Scotland) Ltd
Gorsten Salmon Farm, Ardgour, Fort William, PH33 7AH

Report By: Area Planning Manager – South/Major Development

Purpose/Executive Summary

Description: Marine Fish Farm - Atlantic salmon - Installation of 12 pens and alterations to associated pen moorings and feed pipes

Ward: 21 - Fort William And Ardnamurchan

Development category: N08B - Marine Finfish Farming Local

Reason referred to Committee: Objection from statutory consultee

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

Recommendation

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

1. PROPOSED DEVELOPMENT

- 1.1 The proposed development is for a marine fish farm. It seeks to replace existing Atlantic Salmon 24m square cages with fewer, larger square cages located slightly north east, within an extended planning boundary. There have been cages on the site since the mid-1980s, so are an established element of the landscape.
- 1.2 Pre-application advice (17/00383/PREAPP) outlined the key issues that needed to be addressed in any subsequent application. These included information on any changes to landscape and biodiversity.
- 1.3 The existing marine fin fish farm consists of no.20 x 24m square salmon farming pens and cage moorings with associated feedpipes, pontoon, three single point boat moorings and one Wavemaster raft.
- 1.4 The application was previously screened for EIA purposes (17/00694/SCRE) and was pre-screened for HRA purposes. Both determined that an Environmental Statement and an Appropriate Assessment respectively were not required.
- 1.5 **Variations:** None

2. SITE DESCRIPTION

- 2.1 The proposal seeks to replace no.20 x 24m square salmon farming pens with no.12 x 36m square pens, retaining existing feedpipes, pontoon, three single point boat moorings and one Wavemaster raft, within an extended boundary to allow slightly longer, deeper moorings.

The fish farm is located between Stronchreggan and Inverscaddle Bay on the narrow confines of the western shoreline of upper Loch Linnhe.

3. PLANNING HISTORY

- 3.1 FFA/HLD/015 Scottish Government Audit and Review process: 24 no. 24x24m square cages: 23 Nov 2013
- 3.2 13/04713/PNO Marine Fish Farm, Atlantic Salmon – reduce number of cages from 24 to 20 cages each 24 x 24m and reposition ... configuration within the site area granted planning permission by Scottish Ministers: 18 Dec 2013
- 3.3 17/00694/SCRE Marine fish farm - Atlantic Salmon: alteration from 20 x 24m square cages to 12 x 36m square cages: 2 Mar 2017

4. PUBLIC PARTICIPATION

- 4.1 Advertised : Unknown neighbour 10 Aug 2017
Representation deadline : 10 Aug 2017
Timeous representations : 0
Late representations : 0
- 4.2 Material considerations raised are summarised as follows:

- n/a

5. CONSULTATIONS

- 5.1 **Harbours Lochinver:** No response
- 5.2 **Principal Environmental Health Officer:** No response
- 5.3 **Marine Scotland Science:** No objection
- 5.4 **SEPA:** No objection
- 5.5 **District Salmon Fishery Board Lochaber:** Object due to impacts of sea lice
- 5.6 **Scottish Natural Heritage South Highland:** No objection
- 5.7 **Ministry Of Defence, Defence Estates:** No objection
- 5.8 **Northern Lighthouse Board:** no objection
- 5.9 **Lochaber Fisheries Trust:** object due to impacts of sea lice
- 5.10 **Scottish Water:** No objection
- 5.11 **Crown Estates:** No response

6. DEVELOPMENT PLAN POLICY

The following policies are relevant to the assessment of the application

6.1 Highland Wide Local Development Plan 2012

- 28 Sustainable Design
- 30 Physical Constraints
- 49 Coastal Development
- 50 Aquaculture
- 57 Natural, Built & Cultural Heritage
- 58 Protected Species
- 59 Other important Species
- 60 Other Importance Habitats
- 61 Landscape
- 63 Water Environment

6.2 West Highland and Islands Local Plan (2012) (as continued in force)

7. OTHER MATERIAL CONSIDERATIONS

7.1 Draft Development Plan

Westplan: proposed plan (2017)

7.2 Highland Council Supplementary Planning Policy Guidance

Highland Historic Environment Strategy (Jan 2013)

Highland's Statutorily Protected Species (March 2013)

Special Landscape Area Citations (June 2011)

7.3 Scottish Government Planning Policy and Guidance

Scottish Planning Policy (The Scottish Government, June 2014)

National Marine Plan (2015)

7.4 Other

Highland Aquaculture Planning Guidance (2017)

Highland Coastal Development Strategy (2010)

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 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.

8.3 Planning Considerations

The key considerations are:

- a) compliance with the development plan and other planning policy
- b) significance of the level of change from the existing development
- c) any other material considerations

Development Plan/other planning policy

8.4 Development Plan policy supports the sustainable development of fin-fish subject to there being no significant adverse effect, directly, indirectly or cumulatively on the natural, built and cultural heritage, and/or existing activity in the area.

8.5 **Landscape:** Although larger cages are proposed, the development seeks to move back over to a similar footprint as per the configuration granted by Scottish Ministers (Ref: FFA/HLD/015) before the Prior Notification application (13/04713/PNO). A temporary, mobile 24m square pen will be used to aid harvesting and grading fish. When not in use, it will be stored on a single point mooring. All the equipment, other than that required for safety/navigational markers will be of dark, matt colours. The change to the visual impact of the development will therefore not be significant.

8.6 **Impact on amenity:** There is likely to be no discernible change of impact on amenity due to initial construction or feed deliveries; the latter will remain at about 3-4 deliveries by road to the existing shorebase at Gorsten.

- 8.7 **Biodiversity:** Given the nature and the scale of the change proposed and the longevity of a fish farm at this site, it is unlikely it will have a significantly different impact to that assessed in the previous planning permission issued by the Scottish Government.
- 8.8 **Natura sites:** As there has been a fin fish farm in operation at this site since the mid-1980s, it is unlikely there would be any significant change to impacts on the qualifying feature (Golden Eagle: *Aquila chrysaetos*) of the Moidart and Ardgour Special Protection Area (SPA) or the Glen Etive and Glen Fyne SPA, which lie approximately 2km and 10.8km away respectively. It can be concluded therefore no screening for Habitats Regulation Appraisal (HRA) requirements is necessary.
- 8.9 **Biomass:** The proposal also seeks to change the biomass from a maximum stocked biomass of 2,174 tonnes to 2,500 tonnes. Whilst the biomass elements of this change are considered by SEPA under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), there may also be implications regarding impacts on wild salmonids, therefore also requires planning consideration. The cumulative impacts with the relatively nearby sites at Linnhe, just west of the Coran Narrows, and the site at Loch Leven also require consideration. The latter site is also proposing to increase the biomass on site from 1450 tonnes to 1607 tonnes (17/03214/FUL).
- 8.10 Based on the above, it suggests there could be approximately a 15% change to the sea lice burden on wild salmonids from the Gorsten site and a further 11% cumulative impact from the increase at the Loch Leven site. Both SEPA and MSS have not objected on the grounds of their remits respectively (see below); nor in relation to their respective biodiversity duty in relation to wild salmonids. Similarly SNH has not objected in relation to any impacts on wild salmon and trout; both protected species. None of the rivers in the proximity of the development are designated as SACs for their salmon populations.
- 8.11 The Lochaber District Salmon Fishery Board, a statutory consultee, together with the Lochaber Fisheries Trust Ltd, have objected to the increase in biomass in particular. For the reasons outlined above, this is a material planning consideration despite biomass not being controlled by the planning authority. In summary, both organisations are concerned that the proposal will have a significant impact on wild salmonids, as a result of sea lice and escapes of farmed fish, and particularly in the Rivers Lochy, Nevis, Scaddle, Cona and Kiachnish.
- 8.12 **Sea lice:** the key sea louse species of concern is *Lepeophtheirus salmonis*. They are parasites found in the wild, which can infect farmed salmon. Given the high numbers of fish in the cages, the population of the lice can rapidly increase and affect both the farmed fish and infect/re-infect the wild population. The extra volumes of fish proposed for this application and nearby applications can therefore act as additional host vectors for sea lice.
- 8.13 A simple solution to address the sea lice concerns in this instance would be to allow the change of equipment requested, but to condition the permission such that no increase in biomass should be permitted. This potential approach has been discussed with various operators before. The applicant notes that the principle

driving force to the proposed change is to allow investment in the infrastructure (and the additional biomass would eventually offset the associated costs). As the main impacts of biomass are assessed by SEPA in relation to benthic impacts and water quality, and they have determined that The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as Amended), generally known as the 'CAR licence', can be issued, this suggests the impacts on the farmed salmon are acceptable in relation to SEPAs remit and its biodiversity duty.

- 8.14 Marine Scotland Science (MSS) assesses benthic, water quality and aquaculture animal health i.e. impacts on the farmed fish. In addition, it provides some general information in relation to the potential increased risk to wild salmonids. MSS suggests that performance of existing farms within an area could act as a guide for future performance. Interestingly, in contrast to this advice, the applicant notes that historical data is no longer indicative of a site's ability to control lice. Whilst new approaches to sea lice management for farmed fish are constantly being trialled/used, the main, current readily available proxy for assessing the impact of sea lice on *wild* salmonids is the likely numbers emanating from the farmed fish.
- 8.15 Further details on site-specific sea lice management were requested again (as per the original scoping request), as the information provided tended to be a discussion of general sea lice management measures, rather than the measures that would be used on this site. However the applicant chose to supply a response in relation to the points raised by the District Salmon Fishery Board and the Fisheries Trust. Whilst helpful, it did not fully address the original information requested. The applicant did note the sample size of wild fish caught with sealice referred to by the Board/Trust was very small; the same could be said for the sea lice data provided by all farmed fish monitoring in Scotland (see below) i.e. it is based on a sample size that would not appear to be deemed acceptable for the vast majority of scientific statistical methodologies. However, it is the only data we reasonably have to work with. As of January 2017, the applicant has started publishing monthly sea lice data for all its sites; this is a welcome step forward that will aid planning decision-making.
- 8.16 In the summary responses to the Board/Trust, the applicant notes "*the success of the application will ensure that lice numbers continue to decline at the farm site...*". It remains unclear how allowing additional biomass in new, larger cages will achieve this as the existing sea lice management options are available for application to the existing site. The benefits to improve stock containment are much easier to justify (see 8.19 below).
- 8.17 Data from the Scottish Salmon Producers Organisation (SSPO) suggests that apart from a large increase of sea lice in Oct 2013, sea lice in this management area, which covers three fish farms: Gorsten, Linnhe and Leven, levels have generally been between 0 – 2 times their Code of Good Practice (CoGP) recommended levels. However, as noted by MSS, adherence to the suggested criteria for treatment of sea lice stipulated in the industry CoGP may not necessarily prevent release of substantial numbers of lice from aquaculture installations.
- 8.18 The information provided by the Fishery Board and Fisheries Trust suggests given the location of the proposal in relation to important wild salmonid rivers, this could result in an increased impact on wild salmon and trout due to increased sea lice burdens. The Lochaber Fisheries Trust monitor sea lice on post smolt sea trout and

provide information to show lice burdens are particularly high this year to date and catches are particularly low. These data are however based on very low sample data therefore the significance levels of the data cannot be confirmed. Data on lice burdens from the SSPO are not yet available beyond March 2017 to compare numbers on farmed fish but the decline in wild salmonid catches may be due to other factors as well as, or instead of, sea lice burdens. It is worth noting that other factors, such as global warming, disease in wild fish, low return rates of wild salmon etc do not tend to operate on clear two year cycles therefore any two year trends in lice numbers suggests a clear link to the fish farm operations.

- 8.19 Escapes: The impacts of increased likelihood of fish escapes would also be correspondingly around 15% and a further 11% cumulative impact from the increase at the Loch Leven site. However, information from Lochaber Fisheries Trust Ltd suggests historically, escapes have not been a significant issue for this site, however they have highlighted that whilst the risk of large scale escape is small, the consequences for wild salmon population in a location like Gorston could be significant. The risk of escape is low and when considered with the fairly limited increase in biomass and the equipment attestation information now required by MSS it is considered the proposal is acceptable in relation to this issue.
- 8.20 **Other:** The upper loch is a submarine exercise area and an underwater test area but the proposed change should not have a significant impact on the MOD therefore is acceptable in terms of Policy 30.
- 8.21 Given the long-standing nature of this site, the scale and nature of the change proposed, along with the evolving sea lice management measures, the overall change in impacts to biodiversity can be deemed acceptable.
- 8.22 It can be concluded, provided there is sufficient mitigation, the development can be granted. To help ensure appropriate checks are made on the sea lice issue, the planning authority will apply an Environment Management Plan condition. This approach requires the developer to provide detailed information on how sea lice on the farmed fish will be monitored, treated and what action would be taken if treatments cannot reduce lice numbers to pre-determined levels in an appropriate timescale. The proposal is therefore acceptable in terms of Policies 49, 50, 57- 60 and 63.

Other Considerations – not material

- 8.23 None
Matters to be Secured by Section 75 Agreement

- 8.24 None

9. CONCLUSION

- 9.1 For the reasons discussed above it is considered the proposal accords with the key Policies 28, 61 and 50 of the adopted Highland wide Local Development Plan
- 9.2 All relevant matters have been taken into account when appraising this application. It

is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other 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	N
Notification to Scottish Ministers	N
Notification to Historic Scotland	N
Conclusion of Section 75 Agreement	N
Revocation of previous permission	N

Subject to the above, it is recommended the application be **Granted** subject to the following conditions, reasons and notes to applicant:

1. All surface equipment, with the exception of navigational markers, shall be finished in a dark, matt, neutral colour unless alternative finishes or colours are agreed in advance in writing with the Planning Authority. In particular, the top nets and netting along walkways shall be matt grey. Pipes between the automated feed barge and the cages shall be dark colours, neatly bundled to minimise clutter.
Reason : To minimise the visual impact of the installation and to help safeguard the integrity of the Ardgour Special Landscape Area.
2. All lighting above the water surface and not required for safe navigation purposes should be directed downwards by shielding. It should be extinguished when not required for the purpose for which it has been installed. If lighting is required for security purposes, infra-red lights and cameras should be used.
Reason : To minimise the visual impact of the installation; to ensure that lights left on in the daytime do not draw the eye towards the site and at night do not present unnecessary sources of light pollution.
3. Prior to the commencement of development and notwithstanding the information submitted with this application, an Environmental Management Plan (EMP), or

similar document, will be submitted to and approved in writing by the Planning Authority and should include adequate details to address how compliance can be assessed. This should also detail triggers/thresholds and associated actions in order to secure that any risk to local wild fish populations is minimised. Upon commencement, the development and ongoing operation of the site must be carried out in accordance with the EMP as approved.

The EMP shall be prepared as a single, stand alone document, which shall include the following:

- (1). Sea Lice Management in relation to impact on wild fish, including cumulative effects:
 - a) A method statement for the regular monitoring of local wild fish populations based on available information and/or best practice approaches to sampling;
 - b) details of site specific operational practices that will be carried out following the stocking of the site in order to manage sea lice and minimise the risks to the local wild fish population;
 - c) details of site specific operational practices that will be carried out in order to manage the incidence of sea lice being shed to the wider environment through routine farming operations such as mort removal, harvesting, grading, sea lice bath treatments and well boat operations;
 - d) details of the specification and methodology of a programme for the monitoring, recording, and auditing of sea lice numbers on the farmed fish;
 - e) details of the person or persons responsible for all monitoring activities;
 - f) an undertaking to provide site specific summary trends from the above monitoring to the Planning Authority on a specified, regular basis;
 - g) details of the form in which such summary data will be provided;
 - h) details of how and where raw data obtained from such monitoring will be retained by whom and for how long, and in what form;
 - i) an undertaking to provide such raw data to the Planning Authority on request and to meet with the planning authority at agreed intervals to discuss the data and monitoring results;
 - j) details of the site specific trigger levels for treatment with sea lice medicines. This shall include a specific threshold at which it will be considered necessary to treat on-farm lice during sensitive periods for wild fish;
 - k) details of the site specific criteria that need to be met in order for the treatment to be considered successful;
 - l) details of who will be notified in the event that treatment is not successful;
 - m) details of what action will be taken during a production cycle in the event that a specified number of sea lice treatments are not successful;
 - n) details of what action will be taken during the next and subsequent production cycles in the event that sea lice treatment is not successful.
- (2). Escape Management to minimise interaction with wild fish:
 - a) details of how escapes will be managed during each production cycle;

- b) details of the counting technology or counting method used for calculating stocking and harvest numbers;
- c) details of how unexplained losses or escapes of farmed salmon will be notified to the Planning Authority;
- d) details of an escape prevention plan. This shall include:
 - net strength testing;
 - details of net mesh size;
 - net traceability;
 - system robustness;
 - predator management; and
 - record-keeping methodologies for reporting of risk events. Risk events may include but are not limited to holes, infrastructure issues, handling errors and follow-up of escape events; and
- e) details of worker training including frequency of such training and the provision of induction training on escape prevention and counting technologies.

(3). Procedure in event of a breach or potential breach:

- a) A statement of responsibility to "stop the job/activity" if a breach or potential breach of the mitigation / procedures set out in the EMP or legislation occurs. This should include a notification procedure with associated provision for the halt of activities in consultation with the relevant regulatory and consultation authorities in the event that monitoring demonstrates a significant and consequent impact on wild fish populations as a result, direct or otherwise of such a breach.

(4). Requirement for update and review:

- a) The development and operation of the site, shall be carried out in accordance with the approved EMP unless changes to the operation of the site dictate that the EMP requires amendment. In such an eventuality, a revised EMP will require to be submitted to, and approved in writing by the Planning Authority beforehand. In addition, a revised EMP shall be submitted to and approved in writing by the Planning Authority every 5 years, as a minimum, following the start date, to ensure it remains up to date and in line with good practice.

Reason : To ensure that good practice is followed to mitigate the potential impacts of sea lice loading in the marine environment in general and on wild salmonids in particular; in accordance with the Planning Authority's biodiversity duty.

- 4. In the event of equipment falling into disrepair or becoming damaged, adrift, stranded, abandoned or sunk in such a manner as to cause an obstruction or danger to navigation, the site operator shall carry out or make suitable arrangements for the carrying out of all measures necessary for lighting, buoying, raising, repairing, moving or destroying, as appropriate, the whole or any part of the equipment so as to remove the obstruction or danger to navigation.

Reason : In the interests of amenity and navigational safety.

5. At least three months prior to cessation of use of the site for fish farming, a scheme for the decommissioning and removal of all equipment shall be submitted to and agreed in writing with the Planning Authority. Upon cessation the approved scheme shall be implemented.

Reason : To ensure that decommissioning of the site takes place in an orderly manner and to ensure proper storage and disposal of redundant equipment in the interest of amenity and navigational safety.

REASON FOR DECISION

The proposals accord with the provisions of the Development Plan and there are no material considerations which would warrant refusal of the application.

TIME LIMITS

In accordance with Section 58 of the Town and Country Planning (Scotland) Act 1997 (as amended), the development to which this planning permission relates must commence within THREE YEARS of the date of this decision notice. If development has not commenced within this period, then this planning permission shall lapse.

FOOTNOTES TO APPLICANT

Initiation and Completion Notices: The Town and Country Planning (Scotland) Act 1997 (as amended) requires all developers to submit notices to the Planning Authority prior to, and upon completion of, development. These are in addition to any other similar requirements (such as Building Warrant completion notices) and failure to comply represents a breach of planning control and may result in formal enforcement action.

1. The developer must submit a Notice of Initiation of Development in accordance with Section 27A of the Act to the Planning Authority prior to work commencing on site.
2. On completion of the development, the developer must submit a Notice of Completion in accordance with Section 27B of the Act to the Planning Authority.

Copies of the notices referred to are attached to this decision notice for your convenience.

Accordance with Approved Plans & Conditions: You are advised that development must progress in accordance with the plans approved under, and any conditions attached to, this permission. You must not deviate from this permission without consent from the Planning Authority (irrespective of any changes that may separately be requested at the Building Warrant stage or by any other Statutory Authority). Any pre-conditions (those requiring certain works, submissions etc. prior to commencement of development) must be fulfilled prior to work starting on site. Failure to adhere to this permission and meet the requirements of all conditions may invalidate your permission or result in formal enforcement action

Local Roads Authority Consent: In addition to planning permission, you may require one or more separate consents (such as road construction consent, dropped

kerb consent, a road openings permit, occupation of the road permit etc.) from the Area Roads Team prior to work commencing. These consents may require additional work and/or introduce additional specifications and you are therefore advised to contact your local Area Roads office for further guidance at the earliest opportunity.

Failure to comply with access, parking and drainage infrastructure requirements may endanger road users, affect the safety and free-flow of traffic and is likely to result in enforcement action being taken against you under both the Town and Country Planning (Scotland) Act 1997 and the Roads (Scotland) Act 1984.

Further information on the Council's roads standards can be found at: <http://www.highland.gov.uk/yourenvironment/roadsandtransport>

Application forms and guidance notes for access-related consents can be downloaded from:

http://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_or_working_on_public_roads/2

Construction Hours and Noise-Generating Activities: You are advised that construction work associated with the approved development (incl. the loading/unloading of delivery vehicles, plant or other machinery), for which noise is audible at the boundary of the application site, should not normally take place outwith the hours of 08:00 and 19:00 Monday to Friday, 08:00 and 13:00 on Saturdays or at any time on a Sunday or Bank Holiday in Scotland, as prescribed in Schedule 1 of the Banking and Financial Dealings Act 1971 (as amended).

Work falling outwith these hours which gives rise to amenity concerns, or noise at any time which exceeds acceptable levels, may result in the service of a notice under Section 60 of the Control of Pollution Act 1974 (as amended). Breaching a Section 60 notice constitutes an offence and is likely to result in court action.

If you wish formal consent to work at specific times or on specific days, you may apply to the Council's Environmental Health Officer under Section 61 of the 1974 Act. Any such application should be submitted after you have obtained your Building Warrant, if required, and will be considered on its merits. Any decision taken will reflect the nature of the development, the site's location and the proximity of noise sensitive premises. Please contact env.health@highland.gov.uk for more information.

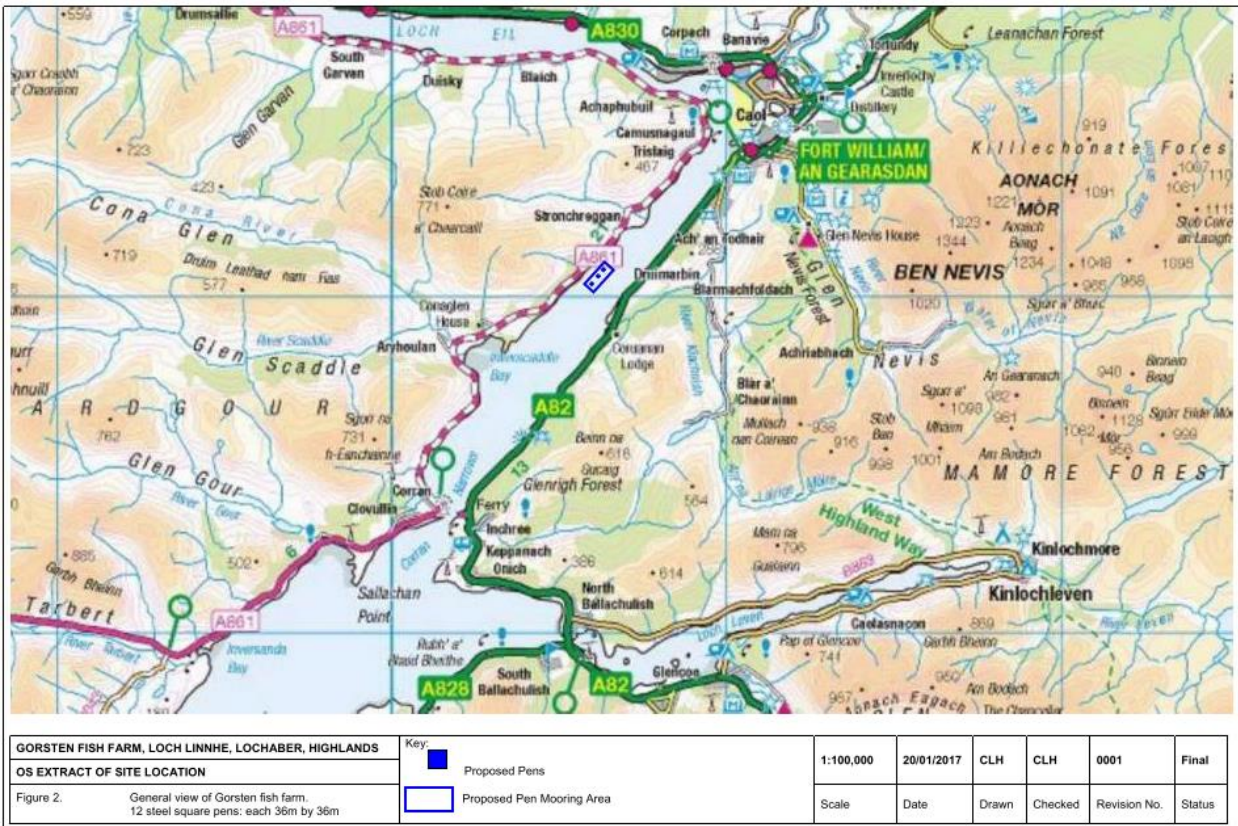
Protected Species – Halting of Work: You are advised that work on site must stop immediately, and Scottish Natural Heritage must be contacted, if evidence of any protected species or nesting/breeding sites, not previously detected during the course of the application and provided for in this permission, are found on site. For the avoidance of doubt, it is an offence to deliberately or recklessly kill, injure or disturb protected species or to damage or destroy the breeding site of a protected species. These sites are protected even if the animal is not there at the time of discovery. Further information regarding protected species and developer responsibilities is available from SNH: www.snh.gov.uk/protecting-scotlands-nature/protected-species

Lighting and Licences: The development should be lit in accordance with Northern Lighthouse Board requirements and obtain any marine licences as required.

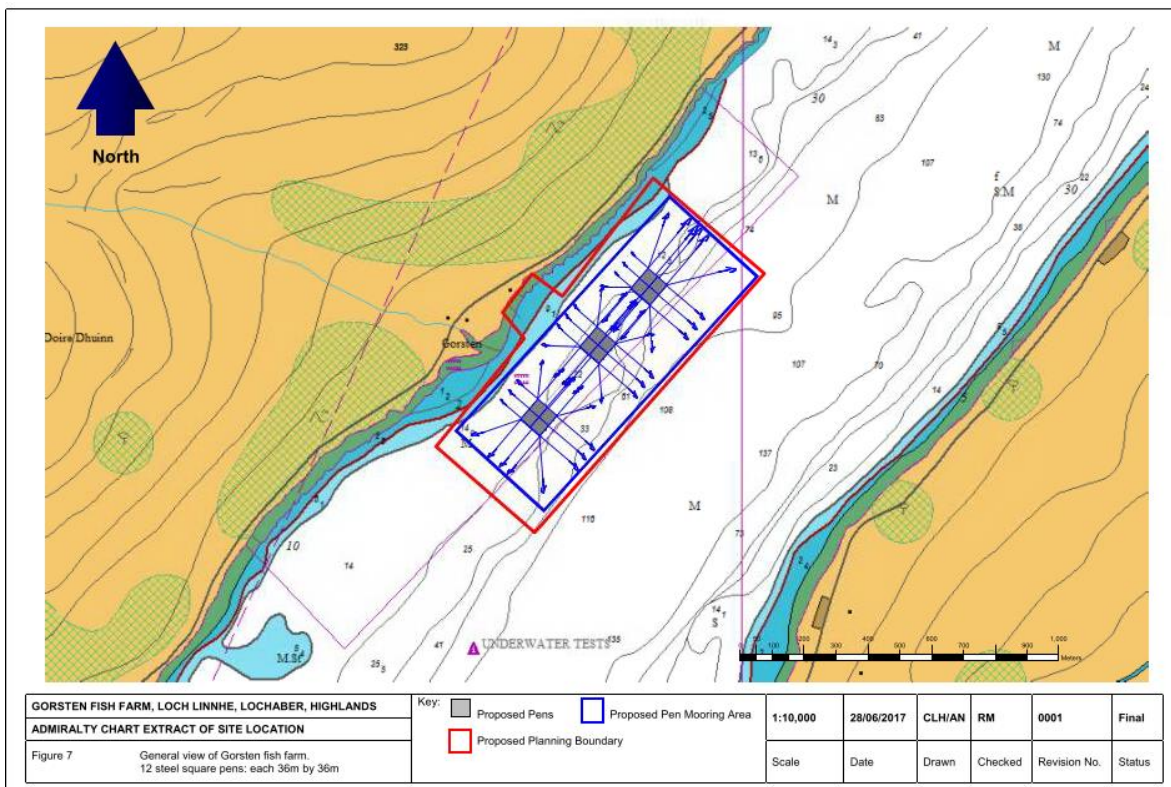
Signature: Nicola Drummond
Designation: Area Planning Manager - South
Author: Shona Turnbull
Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 – Location Plan
Plan 2 – Planning Boundary
Plan 3 – Plan showing existing and proposed cages

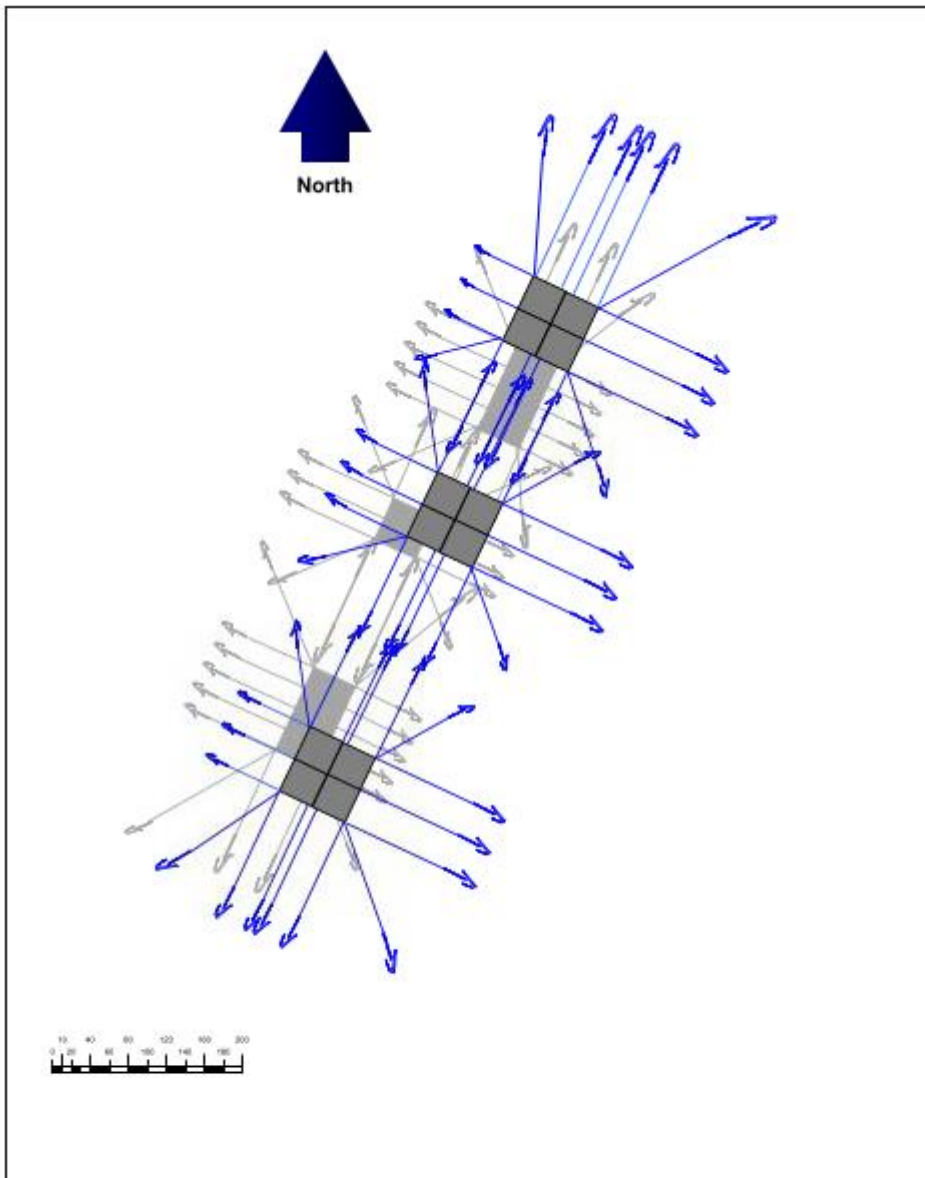
Plan 1: (Figure 2 in edrms) Location





Plan 2: (Figure 7 in edrms) Planning boundary



Plan 3: Existing and proposed cages (also named Figure 7 in erdms) (not to scale)



GORSTEN FISH FARM, LOCH LINNHE, LOCHABER, HIGHLANDS			Key:		
SITE PLAN: PROPOSED vs EXISTING EQUIPMENT				Proposed	
Figure 7. Proposed pens overlaying the existing layout.				Existing	
1:4,000	20/01/2017	CLH	CLH	0001	Final
Scale	Date	Drawn	Checked	Revision No.	Status