

**DEVELOPMENT CONTROL AND REGULATION COMMITTEE**  
**29 September 2022**  
**A report by the Executive Director - Economy and Infrastructure**

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**Application Reference No. 1/22/9004**

**Application Type:** Full Planning Permission

**Proposal:** Extension including internal and external alterations to building to form a sixth form campus for pupils from James Rennie School

**Location:** Former St Edmunds Church, St Edmunds Park, Carlisle, CA2 6TS

**Applicant:** Cumbria County Council

**Date Valid:** 20 July 2022

**Reason for Committee Level Decision:** Application made by Corporate Director of Economy and Highways

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## **1.0 RECOMMENDATION**

1.1 That planning permission be GRANTED subject to conditions as set out in Appendix 1 to this report.

## **2.0 THE PROPOSAL**

2.1 Planning permission is sought for an extension which involves internal and external alterations to the building to form a sixth form campus for pupils (aged 16+) from James Rennie School. The proposed school would provide accommodation for 45 pupils and 18 staff (full/part time).

2.2 Places of worship and schools fall into the same Use Class as defined under Town and Country Planning (Use Classes) (**Amendment**) (England) Regulations 2020 Schedule 2, Part B. Places of worship fall within use Class F1(f) and provision for education falls into class F1(a). The change of use is therefore considered to be permitted development as the two uses fall within the same use class order and therefore there is a permitted change between the two uses which does not entail applying for planning permission.

2.3 The proposed extension would provide an office and a waiting lobby. The extension would create 27m<sup>2</sup> of floorspace (3.51m x 7.74m). This is proposed on the front of the building. The internal operations would include three classrooms, common room, kitchen/food technology, break out room, assisted showers, wc facilities at ground floor level. First floor would be a fourth classroom, sensory room, meeting room, office space and staff room, assisted shower room and wc. The existing building floor area is 530m<sup>2</sup>. A 1.8m high fence would be erected to the eastern part of the church grounds.

2.4 There would be some hard surfaced areas required externally. A play ground hard surfacing area would cover approximately 200m<sup>2</sup> and resurfaced car parking and turning area would be 80m<sup>2</sup>. The car park and hard surfaced area would create 20 car parking spaces and turning/drop off area for mini buses.

2.5 St Edmund Church is a red/grey brick building which stands alone in its own

grounds. The proposed extension to the front elevation would be designed and in keeping with the existing building using the same materials.

2.6 Vehicular access to St Edmund Church is on St Edmund Park, which is a residential street. This connects onto Orton Road, the C2051, which links to the City Centre to the east and A689 to the west.

2.7 The school would operate between the hours of 8.00 am to 6.00 pm Monday to Friday. The actual school day is 9.00 am to 3.30 pm.

### **3.0 SITE DESCRIPTION**

3.1 St Edmunds Church was designed and built in 1981 and has been used as a place of worship since then. The capacity congregation of the Church is 120 people. The Church is in the ownership of "Our Lady of Perpetual Help" at the time of the making of this planning application.

3.2 St Edmunds Church is located to the west of Carlisle in the ward of Yewdale. This is predominately a residential area of which Orton Road, the C2051, is the main thoroughfare.

3.3 The main James Rennie School is located on California Road approximately 3 miles north east of St Edmund Church.

3.4 To the north, east, south and west of St Edmund's Church are residential properties. The nearest property is 70 St Edmund's Park, which is located on the southern boundary. There is 4.5m from St Edmund Church to the boundary line and 6.2m to the gable wall. The northern and eastern boundaries are defined as a hedgerow, the southern boundary is a mix of palisade fencing and larch lap fencing panels, which leads onto a former play area and 70 St Edmund's Park, and the west boundary is an open boundary onto St Edmunds Park.

3.5 Orton Road is a tree lined road with two way traffic where traffic enters the City or connects onto the A689 in the west. Access to St Edmund's Church is approximately 14m from the junction with Orton Road (C2051), only one property is passed, 1 St Edmunds Park; the access to 1 St Edmunds Park is to the rear of the property. There is a 6ft larch lap fence on the boundary of 1 St Edmunds Park and the footpath facing St Edmunds Church. St Edmunds Park is a mix of detached and semi detached houses and bungalows and is set on three separate cul de sacs, which access 70 properties. The estate road is classed by highways as the U122 and is a single 2 lane carriageway.

### **4.0 SITE PLANNING HISTORY**

4.1 There is no planning history for St Edmund's Church with regards to built development. The only permission has been a Tree Preservation Order application 17/0034/TPO to remove a dead oak stem leaning towards the road/footpath and crown lift 6 oak trees to a height of 13 feet and dead wood.

### **5.0 CONSULTATIONS AND REPRESENTATIONS**

5.1 **Carlisle City Council Planning Department:** No objection

5.2 **Carlisle City Council Environmental Health Department:** the applicant should be advised to contact this department in order to be advised with regard to legislative compliance for food hygiene and safety and to register the new facility.

- 5.3 **CCC Highway Authority:** Taking into account the previous use the proposed will be slight intensification. The access is existing from the C2051 Orton Road, U122 St Edmunds Park road to the private site, with links to the A689 Bypass, local bus, cycle and walking routes. However it is unlikely that the existing access will have been built to standard that could accommodate daily minibus traffic – can we ask for this to be widened (as currently the dropped kerbs lie inside the access width) and be reconstructed in bituminous materials so that there are no ongoing maintenance issues. Adequate parking available on site 20 spaces existing with turning area for minibus / taxi drop off point. Although the Design and Access Statement states around 95% will travel via the minibus / taxi, the potential traffic and parking associated may cause some local issues with estimated 5% dropped off by parents. There are no on-street restrictions. The small extension to form a lobby and school offices area, will not increase the impermeable area.
- 5.4 **CCC Lead Local Flood Authority:** The Lead Local Flood Authority (LLFA) have records of minor surface water flooding to Orton Road and St Edmunds Park Road, which lead to the site and the Environment Agency (EA) surface water maps do not indicate that the site is in an area of risk.
- 5.5 **Local Member for Yewdale Cllr Haraldson has been informed.** No response received.
- 5.6 **Carlisle City Councillor for Sansfield and Morton West Cllr Bainbridge:** Parking restrictions for entrance of the school site would be required, particularly as you leave the school site, traffic on Orton Road would be increased by the use of the church as a school and the windows need sound proofing to prevent noise leaving the building.
- 5.7 Any late responses received in advance of Committee will be reported to Members on the update sheet.
- 5.8 Three letter of representation has been received. They are concerned with regards to noise, increase in traffic, pollution, impact on the residential amenities, impact on house prices, lack of privacy, the County Council applying to itself for planning permission and the lack of consultation with local residents.

## 6.0 PLANNING POLICY

- 6.1 [Section 38\(6\)](#) of the [Planning & Compulsory Purchase Act 2004](#) provides that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. Government policy is a material consideration that must be given appropriate weight in the decision making process.
- 6.2 The [Carlisle District Local Plan 2015-2030 \(CDLP\)](#) - adopted 8 November 2016.
- Policy SP6 – Securing good design
  - Policy CC 5 - Surface Water Management and Sustainable Drainage Systems
- 6.3 [The National Planning Policy Framework](#) (NPPF) was published in March 2012 and last revised in July 2021. The national online [Planning Practice Guidance](#) (PPG) suite was launched in March 2014. Both are material considerations in the

determination of planning applications. The following sections and paragraphs of the NPPF and/or PPG are considered to be relevant to the determination of this application:

- Achieving Sustainable Development paragraphs 7 to 14
- Decision Making paragraph 38
- Achieving Well Designed Place paragraphs 126, 130 and 132
- How are well-designed places achieved through the planning system?  
Paragraph: 001 Reference ID: 26-001-20191001

## **7.0 PLANNING ASSESSMENT**

7.1 The key planning issues relevant to the proposed schemes are considered to be:

**Is there a need for the additional sixth form accommodation?**

**Is the design acceptable within the existing School complex?**

**Would the use of the former church and proposed extension have any impact on residential amenities?**

**How will the new accommodation foul and surface water drainage be disposed of?**

**Would there be any impacts from the proposed car park and drop off/pick up area?**

**Does the School have a School Travel Plan?**

**Would there be any Environmental Impacts from the proposed extension?**

**Comments received from local residents and Carlisle City Council Member**

**Is there a need for additional sixth form accommodation?**

7.2 James Rennie School is a school for Special Education Needs and Disability and is one of only six such schools in the County. There is a very high demand for places at James Rennie School and in light of this high demand, new off site additional sixth form accommodation is now sought. The new accommodation has been identified as St Edmund's Church, Orton Road, Carlisle. This is a former church which has ceased operations and could provide accommodation for sixth form pupils and staff.

**Is the design of the extension acceptable to the existing church building?**

7.3 Carlisle City Local Plan Policy SP6 requires development proposals to be assessed against the following design principles. Proposals should: respond to the local context and the form of surrounding buildings in relation to density, height, scale, massing and established street patterns and by making use of appropriate materials and detailing and ensure there is no adverse effect on the residential amenity of existing areas, or adjacent land uses, or result in unacceptable conditions for future users and occupiers of the development.

7.4 The proposed extension would be on the front elevation providing a small area to

accommodate office and waiting areas, measuring approximately 27m<sup>2</sup> (7.74m x 3.51m). The extension would be a flat roofed single storey structure in the centre of the front elevation, which forms the footprint of the existing step. The materials would match the existing red/grey brick main church building. There would be no alterations to the existing windows on the northern elevation. A new ramp would be required to allow access to the extension area. The extension is small in terms of size in relation to the existing building.

- 7.5 I consider the design of the proposed extension is acceptable in terms of its design within the existing church structure and grounds as the existing building is a modern contemporary building and complies with Carlisle City Local Plan SP6.

**Would the proposed extension have any impact on residential amenities?**

- 7.6 Carlisle City Local Plan Policy SP6 requires development proposals to be assessed against the following design principles. Proposals should: respond to the local context and the form of surrounding buildings in relation to density, height, scale, massing and established street patterns and by making use of appropriate materials and detailing and ensure there is no adverse effect on the residential amenity of existing areas, or adjacent land uses, or result in unacceptable conditions for future users and occupiers of the development.
- 7.9 The building would be used by older school children aged 16 years plus who are attending the building as a sixth form facility. The school teaching operational hours would be 9.00 am to 3.30 pm, however the school would be open from 8.00 am to 6.00 pm.
- 7.10 The main impact would be the extension and resurfacing of the car park area and how this would impact on the amenities of local residents. The extension and resurfacing of the car part are on the front elevation (facing north onto Orton Road). There would be no direct impact on local residents as the nearest property is to the south of St Edmunds Church.
- 7.11 Yewdale School is located 340m north west, which has a student count of 262 pupils, 35 teaching staff and 8 mid-day/cleaning staff. This is accessed from Yewdale Road, which connects onto Holmrook Road and Orton Road. The school is in a residential area close to existing residential properties, which back or face onto the school grounds. Yewdale School is 40m from the nearest property.
- 7.12 In comparison to Yewdale School, the use of St Edmund's Church has a minor impact on the amenities of local residents.
- 7.13 I consider the impacts on the amenities of local residents would be minor ones, which would be limited to the school opening hours. There would be no impact on residential amenities in an evening or at weekends. I consider the proposal complies with Carlisle Local Plan Policy SP6.

**How will the new extension and resurfacing impact on foul and surface water drainage?**

- 7.14 Carlisle Local Plan CC5 states development proposals should prioritise the use of sustainable drainage systems. Surface water should be managed at the source, not transferred; and discharged in the following order of priority into the ground (infiltration at source); attenuated discharge to a surface water body;

attenuated discharge to surface water sewer, highway drain or another drainage system; and as last resort attenuated discharge to a combined sewer

- 7.15 The existing foul drainage connects into the existing sewerage system and there would be no change to the foul drainage arrangements. Surface water run off would be to the existing system.
- 7.16 Drainage to the proposed car park would be to the existing surface water drainage system.
- 7.17 The Lead Local Flood Authority has raised no objections. I consider the proposal complies with Carlisle Local Plan Policy CC5.

**Would there be any impacts from the proposed car park and drop off/pick up area?**

- 7.18 St Edmund's Church is an existing establishment with parking provision for 20 vehicles, accessed from St Edmund's Park. The access is approximately 14m from the junction with Orton Road (C2051), which is a main arterial route into Carlisle City Centre. Orton Road is a two lane carriageway which accesses the Yewdale housing estate, which has a mixture of shops and business.
- 7.19 The proposal would allow up to 20 cars to be parked on the existing car park, which would be resurfaced. There would be a drop off area for mini buses and private cars to drop pupils off safely. A ramped access is proposed to the front extension to allow the safe passage of pupils from the vehicles into the school premises.
- 7.20 The pick up and drop off's would have an impact on the highway network for 30 mins in a morning and 30 mins in an afternoon 5 days per week. There would be minimal activities on Saturday, Sunday or Bank/Public Holidays.
- 7.21 CCC Highways have no objections stating "*taking into account the previous use the proposed will be slight intensification*". They have requested the access driveway to be widened in light of the slight intensification of the use by mini buses at St Edmund's Church.
- 7.22 I consider the car parking and pick up and drop off area would have a minor impact on the amenities of local residents, which would be for half an hour in a morning and the same in the afternoon. The C2051 is not at capacity and can accommodate an additional 10-15 vehicles each day.

**What are the proposed internal changes to St Edmund Church?**

- 7.23 The current layout provides a ground floor large main hall, kitchen with servery, storage, ladies and gents wc, boys sacristy, priests sacristy and entrance hall. At first floor ancillary living accommodation, hall, office and store room.
- 7.24 The proposed internal changes would create at ground floor three classrooms, a common room, kitchen/food technology space, offices, assisted showers, wc's and breakout room. At first floor there would be a classroom, sensory room, staff room, office, meeting room, assisted showers and wc. A lift would also be installed to the western side of the building.
- 7.25 The internal changes would not have any impact on the external appearance of the existing church building, however the rear windows facing 70 St Edmund

Park would all be reglazed. There would be no impact on the amenities of local residents from the internal alterations.

### **Does the School have a School Travel Plan?**

- 7.26 James Rennie School does have an up-to-date school travel plan. However, this is a new school and will require an individual School Travel Plan to be prepared and implemented. An appropriately worded condition in Appendix 1 identifies what is required for the School Travel Plan.
- 7.27 I consider that a new School Travel Plan is required and can be achieved to reduce travel to the school. This needs to be independent and separate to the main school travel plan for James Rennie School.

### **Would there be any Environmental Impacts from the proposed extension?**

- 7.28 **Noise:** Noise would be generated by talking of users of the school. This would be mainly confined to within the building. However, there may be some talking which would occur in outdoor areas. With regards to other noise this would be local noises in the area of traffic, machinery etc you would generally find in a residential area.
- 7.29 **Pollution:** Carlisle City Council have Air Quality Management Areas (AQMA), Orton Road is not an AQMA area and therefore is not subject to any controls. Pollution can come in many forms, from vehicles, operational machinery, spillages etc. There would be between 10-15 vehicles accessing Orton Road and St Edmund's Park, which would have a very minor impact on pollution in the area.
- 7.30 **Lighting:** External Lighting could impact on the amenities of local residents if it is not sighted properly to prevent spillage into local properties. Any lighting would be directed into St Edmund's Church only. This would be controlled by condition to ensure there is no light pollution or impact on amenities of local residents.
- 7.31 **Dust:** Impacts of dust would come from the building works, these would be temporary short term impacts. These impacts would be no greater than any of the residential properties having an extension built. A construction management plan will be required to ensure the construction works are carried out accordingly.
- 7.32 **Construction Works:** There will be a minor impact whilst construction works are undertaken as these will involve work on the minor extension, internal layout works, erection of fencing and resurfacing of the car park. These are temporary operations and will be completed as quickly as possible. The works would be controlled by appropriately worded conditions as set out in Appendix 1.
- 7.33 I consider that any environmental impacts would be minor impacts mainly during construction activities which would last for a maximum of 6 months.

### **Concerns of local residents**

- 7.34 Two letters of objection has been received, raising concerns with regards to noise, increase in traffic, pollution, impact on the residential amenities, impact on house prices and lack of privacy, Cumbria County Council applying to itself for planning permission and lack of consultation with local residents.
- 7.35 **Noise:** Noise could come from dropping off of pupils and at break times, these

would be short term noise impact. Most noise would be contained within the building and would not have an impact on the amenities of local residents.

- 7.36 **Increase in traffic:** The church has a congregation capacity of 120 , when the church was originally assessed it would have been assessed on the maximum capacity of 120 people/visitors. The school would generate half of the maximum congregation capacity and thereby would be half of the traffic numbers originally considered.
- 7.37 **Pollution:** There would be no increase in pollution to the area, this has been considered in paragraph 7.30.
- 7.38 **Impact on residential amenity:** These impacts have been fully considered in paragraphs 7.7 to 7.14 of this report.
- 7.39 **Lack of privacy:** The use of St Edmund's Church as a school would not impact on the privacy of local residents. This has been considered in paragraphs 7.7 to 7.14.
- 7.40 **Loss of value to property:** This is not a planning consideration.
- 7.41 **Cumbria County Council applying to itself for planning permission:** Under the Town and Country Planning Regulations 1992, Regulation 3 states *“an application for planning permission by an interested planning authority to develop any land of that authority, or for development of any land by an interested planning authority or by an interested planning authority jointly with any other person, shall be determined by the authority concerned, unless the application is referred to the Secretary of State under section 77 of the 1990 Act for determination by him.”*
- 7.42 **Lack of pre-consultation with local residents:** This proposal is for a small extension to the front of St Edmund Church and alterations to the existing car parking arrangements. The use of the building does not require a change of use as the two uses are within the same use class.
- 7.43 **Carlisle City Councillor for Sansfield and Morton West Cllr Bainbridge:** Parking restrictions for entrance of the school site, particularly as you leave the school site, traffic on Orton Road and sound proofing of windows. The comments with regards to parking restrictions at the entrance have been forwarded to the applicant for them to pursue. Traffic on Orton Road would have a very minor impact on everyday use and the windows on the rear elevation are to be reglazed as part of the proposal.
- 7.44 I consider the concerns of local residents and Carlisle City Council Member have all been considered in this report and there would be little impact on the amenities of local residents.

## **8.0 CONCLUSION**

- 8.1 I consider the proposed extension and internal alterations to St Edmund's Church are acceptable and are minor in nature to the size of the building. The alterations comply with Local and National Planning Policy.
- 8.2 The use of St Edmund Church would have a much lesser occupation than it was originally designed for when constructed which had a capacity for 120 people the



use by the school would be half of the original congregation capacity of around 45-50 people. The proposed extension, internal alterations and formal laying out of the car park area would bring St Edmund's Church back into a habitable use.

- 8.3 In summary, it is considered that the proposed development is in accordance with the development plan, there are no material considerations that indicate the decision should be made otherwise than in accordance than the development plan and with the planning conditions proposed, any potential harm would reasonably be mitigated. Furthermore, any potential harm to interests of acknowledged importance is likely to be negligible and would be outweighed by the benefits of the development. It is therefore recommended that this application be granted subject to conditions

### **Human Rights**

- 8.4 The Human Rights Act 1998 requires the County Council to take into consideration the rights of the public under the European Convention on Human Rights. Article 8 of the Convention provides that everyone has the right to respect for his private life and home save for interference which is in accordance with the law and necessary in a democratic society in the interests of, amongst other things, public safety, the economic wellbeing of the country or the protection of the rights and freedoms of others. Article 1 of Protocol 1 provides that an individual's peaceful enjoyment of his property shall not be interfered with save as necessary in the public interest and subject to conditions provided for by law. For any interference with these rights to be justified the interference needs to be proportionate to the aims that are sought to be realised. The County Council has a duty to consider the policies of the development plan and to protect the amenities of residents as set out in those policies.
- 8.5 The proposal would have a limited impact on the visual, residential and environmental amenity of the area but it is considered that those impacts would be insufficient to interfere with the rights of the applicant and satisfactory controls could be imposed on the proposed development to protect the amenities of the most affected residents. The impacts on the rights of local property owners to a private and family life and peaceful enjoyment of their possessions (Article 8 and Article 1 of Protocol 1) would be minimal and proportionate to the wider social and economic interests of the community and could be satisfactorily controlled by planning conditions.

**Angela Jones**  
**Executive Director - Economy and Infrastructure**

**Contact:** Mrs Jayne Petersen

**Electoral Division Identification:** Yewdale

Development Control and Regulation Committee – 29 September 2022

**Appendix 1 - PROPOSED PLANNING CONDITIONS**

**Time Limit for Implementation of Permission**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

*Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.*

**Approved Scheme**

- 2 The development hereby permitted shall be carried out, except where modified by the conditions to this permission, in accordance with the following:

- a. The submitted Application Form – dated 8 July 2022
- b. Design and Access Statement – Dated June 2022
- c. Plans numbered and named:
  - i) Location plan – Drawing No 5713-4 dated 7 July 2022
  - ii) Exiting plans and elevations – Drawing No 5713-1-A dated 24 March 2022
  - iii) Proposed plans and elevations – Drawing No 5713-3-B dated 24 March 2022
  - iv) Site Plans – Drawing No 5713-3-A dated 24 March 2022

*Reason: To ensure the development is carried out to an approved appropriate standard and to avoid confusion as to what comprises the approved scheme.*

3. The vehicular crossing over the footway, including the lowering of kerbs, shall be carried out to the specification of the Local Planning Authority in consultation with the Highway Authority.

*Reason: To ensure a suitable standard of crossing for pedestrian safety.*

4. The access drive shall be surfaced in bituminous or cement bound materials, or otherwise bound and shall be constructed and completed before the development is occupied/brought into use.

*Reason: In the interests of highway safety.*

5. Within three months of the commencement of occupation of the school, the Travel Plan shall have been developed, to achieve modal shift away from the use of private cars to transport pupils, to transport modes that have a lesser impact on the highway network. This must include measures to be adopted to reassess the 'modes of travel'; identify safe journey routes/modes; and set targets to be used as benchmarks for the Annual Review Reports in the following four following academic years. The Full Travel Plan shall be submitted to the Local Planning Authority for their approval. Any further measures identified by the Local Planning Authority as being required, shall be

implemented in full within the following 12 months and be continued until the following Annual Review, which will report on the effectiveness of the measures so provided.

*Reason: To aid in the delivery of sustainable transport objectives.*

6. Any artificial lighting units shall be so sited and shielded as to be incapable of direct sight from any residential property outside the site.

*Reason: In the interests of local amenity and prevent light pollution.*

7. No development shall commence on site until a Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing by the County Planning Authority. The CTMP shall include details of:
- the construction of the site access and the creation, positioning and maintenance of associated visibility splays;
  - access gates will be hung to open away from the public highway no less than 10m from the carriageway edge and shall incorporate appropriate visibility displays;
  - details of proposed crossings of the highway verge;
  - retained areas for construction personnel vehicle parking, manoeuvring, loading and unloading for their specific purpose during the development;
  - the surfacing of the access roads from the public highway into the site shall extend for a minimum of 10m;
  - construction vehicle routing; the scheduling and timing of movements, routing, details of escorts for abnormal loads, temporary warning signs and banksman;
  - details of how residents will be notified of large HGV movements;
  - clearing of debris from the highway;
  - methods to prevent noise, dust and vibration during construction works
  - pre-construction road condition established by a detailed survey for accommodation works within the highway boundary, conducted with a Highway Authority representative.

*Reason: To ensure the construction is carried out in accordance with the approved scheme.*

8. Construction works shall only be undertaken between the hours of 08.00 to 17.00 Monday to Friday, with no construction works on Saturday, Sunday or Bank/Public Holidays. Any out of hours deliveries shall be notified to the Local Planning Authority in advance and immediate neighbours should be notified in writing of such instances.

*Reason: In the interests of residential amenities of local residents.*

## **Informative**

The applicant should be advised to contact Carlisle City Council Environmental Health Department in order to be advised with regard to legislative compliance for food hygiene

and safety and to register the new facility.

If the application is approved the applicant must not commence works, or allow any person to perform works, on any part of the highway until in receipt of an appropriate Cumbria County Council Serving the people of Cumbria [cumbria.gov.uk](http://cumbria.gov.uk) permit allowing such works. They will need to contact Streetworks Central [streetworks.central@cumbria.gov.uk](mailto:streetworks.central@cumbria.gov.uk) for the appropriate permit.

The applicant should seek to the installation of School road markings and School highway signs from the Streetworks team.

Trees on the front boundary are subject to Orton Road Tree Preservation Order No 174 2003

Appendix 2 - PLAN OF SITE LOCATION/EXTENT

