

Ascerta

Landscape, Arboricultural & Ecological Solutions
for the Built Environment

Bat Roost Assessment

Former Mondi Site
(Site 1)

Holcombe Mill
Bridge Street
Ramsbottom
BL0 0BS

Ref: P.1202.19

March 2020

Revision	Date	Description
A	09/03/2020	Minor amendment
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Ascerta

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P.1162.19

Bat Roost Assessment

Of

**Former Mondi Site (Site 1)
Holcombe Mill
Bridge Street
Ramsbottom
BL0 0BS**

For

Eccleston Homes Ltd

06 March 2020

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QA Review & Approval	Danielle Wood- Office manager

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EXECUTIVE SUMMARY

Ascerta has been instructed by Eccleston Homes to carry out surveys to determine if bats are using buildings as a roost at the land at Former Mondi Site, Holcombe Hill, Bridge Street, Ramsbottom BL0 0BS.

The site was visited on 17th February 2020 by Ms Tosha Allen and Mrs Liz Kenyon, when a daytime external inspection of the buildings took place. The inspections closely followed revised guidelines set out by the Bat Conservation Trust (2016).

All the buildings on the site were subject to a preliminary search externally by a suitability qualified ecologist. Close focusing binoculars were used where appropriate to search for signs of bats i.e. staining on barge boards, soffits and more commonly droppings on flat surfaces i.e. window ledges, that would indicate potential roosting sites.

On 17th February 2020, a daytime external inspection of the buildings was carried out by suitably qualified ecologists Ms Tosha Allen and Mrs Liz Kenyon. The buildings were searched externally looking for signs of bats or features bats could use as a roost.

Building B3 will be lost within the current planning application and was considered to have **moderate** bat roost potential, with habitats on site providing **high** suitability for foraging and commuting bats with good connectivity to the east of the site within the broadleaved woodland and habitats along the River Irwell. The majority of the trees on the site were assessed to provide **negligible** bat roost potential although, trees within the woodland were not assessed as they will be retained within the proposals.

Buildings B1, B2 and the chimney will not be lost or have any works completed on them within the current planning application and will require no further nocturnal surveys for bats.

The following recommendations are made in order to satisfy current wildlife guidance and legislation including the NPPF and Policy EN6 of the Bury Council Unitary Development Plan (UDP). If followed in full it is considered that bats will not be harmed as a result of the proposals:

1. A minimum of two nocturnal surveys to be carried out at building B3 between May and August (in suitable weather conditions) to assess for the presence of roosting bats;
2. The roof and ridge tiles should be removed using Reasonable Avoidance Measures to ensure no harm to bats that may roost within the property opportunistically over the summer;
3. Mitigation for loss of bat roosting habitat by the installation of one bat box / bat brick installed onto a new building within the proposals;
4. Retaining the value of the site for foraging and commuting bats by ensuring lighting does not exceed current levels and is sensitive to the needs of bats. Light spill will need to avoid retained and off-site habitats, through the use of lamps fitted with filters or hoods to reduce light spill. Alternatively, sensors installed so that lighting is only activated when required as per advice within the Bats and Lighting in the UK (2018) document;
5. Enhancing the site for bats with 15 bat boxes / bat bricks on retained trees or buildings within the site, along with tree planting and hedgerow planting with native species;
6. Works to the building / vegetation clearance should occur outside the period 1st March to 31st August to protect breeding birds, unless an ecologist has

confirmed that the actions proposed will not disturb bird breeding on the site;
and

7. In order to mitigate for the loss of bird nesting habitat it is recommended that two open fronted nest boxes, one house sparrow terrace and one swift nest box should be fitted to the newly constructed buildings on the site.

1.0 Introduction

Ascerta has been instructed by Eccleston Homes to carry out a bat survey at the land at Former Mondi Site, Holcombe Hill, Bridge Street, Ramsbottom BL0 0BS (hereafter referred to as the site). The site OS grid reference is SD 793 616.

An external inspection of the buildings on the site was carried out on 17th February 2020 by suitably qualified ecologists Ms Tosha Allen and Mrs Liz Kenyon.

This report presents the results of the survey and includes recommendations for further actions where applicable in order to satisfy current wildlife legislation and in order to achieve our client's objectives.

2.0 Objectives

Our client's objectives are to ascertain the potential ecological constraints and opportunities of the site to inform potential future development of 60 residential buildings.

Our objectives are as follows:

- Carry out an external inspection of the buildings on the site;
- Provide recommendations for mitigation measures where current legislation requires;
- Provide recommendations that seek to enhance the ecological value of the site; and
- Provide recommendations to assist our clients in achieving their objectives whilst satisfying current wildlife legislation.

3.0 Relevant Legislation

3.1 UK Legislation

The key UK legislation is the Wildlife and Countryside Act 1981 (as amended by the Countryside Rights of Way Act 2000) which consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain. It is complemented by the Conservation of Habitats and Species Regulations 2017, which implements Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive). The Regulations provide for the designation and protection of 'European sites', and the protection of 'European protected species'.

In England, all bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife & Countryside Act 1981 (as amended). Barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, Noctule *Nyctalus noctula*, Soprano pipistrelle *Pipistrellus pygmaeus*, Brown long-eared *Plecotus auritus*, Greater horseshoe *Rhinolophus ferrumequinum* and Lesser horseshoe *Rhinolophus hipposideros* bats are also listed under Section 41 of the

NERC Act. Several species of bat are also highlighted as Priority Species under the UK Biodiversity Action Plan and within Greater Manchester Biodiversity Action Plan.

Under the current legislation as summarised on pages 8 and 9 of the Bat Surveys for Professional Ecologists Good Practice Guidelines – 3rd Edition (2016) it is a criminal offence to:

“To kill, capture, injure or take a wild bat;

- To damage or destroy a place used by a bat for breeding or resting. All offences of this nature are identified within the Habitats Regulations. This offence is unique in that it can be committed accidentally. No element of intentional, reckless or deliberate action needs to be evidenced;*
- To disturb bats anywhere (roosts, flight lines or foraging areas) if levels of disturbance can be shown to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate or to affect significantly local distribution or abundance;*
- To intentionally or recklessly disturb a bat, whilst it is occupying a place of shelter or protection;*
- To intentionally or recklessly obstruct access to any place used by a bat for shelter or protection; and*
- To be in possession or control of a bat alive or dead (or any part of a bat or anything derived from a bat, although bat droppings are generally considered to be acceptable), or to transport a bat, to sell or exchange a bat or to offer to sell or exchange a bat taken from the wild.”*

3.2 Local Legislation

The site lies within Bury Council and is covered by the Bury Council Unitary Development Plan (UDP) (adopted August 1997). Policy EN6 deals with Conservation and the Natural Environment and is the policy of relevance here. This policy has been taken into account when preparing this report.

4.0 Survey Method

4.1 Bat Survey

The survey methods followed the guidelines set out by the Bat Conservation Trust (Collins 3rd Edition 2016).

Table 4.1: Guidelines for assessing Potential Roost Features (PRFs), commuting and foraging habitat within a proposed development site. Guidelines taken from table 4.1 page 35 of the Bat Conservation Trust Bat Surveys for Professional Ecologists Good Practice Guidelines – 3rd Edition (2016).

Suitability	Roosting Habitats	Commuting and Foraging Habitats
Negligible	<i>Negligible habitat features on site likely to be used by roosting bats.</i>	<i>Negligible habitat features on site likely to be used by commuting or foraging bats.</i>
Low	<i>A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^a and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation ^b). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential. ^c</i>	<i>Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.</i>
Moderate	<i>A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions^a and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).</i>	<i>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.</i>
High	<i>A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^a and surrounding habitat.</i>	<i>Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.</i>

^a For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

^b Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten et al., 2015). This phenomenon requires some research in the UK but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in large buildings in highly urbanised environments.

^c This system of categorisation aligns with BS 8596:2015 Surveying for bats in trees and woodland (BSI,2015).

Record Search

The local biological records centre Greater Manchester Ecology Unit was consulted for records of bats within 2km of the site. A review of the designated sites and habitats within 2km of the site has been undertaken using the Multi-Agency Geographic Information for the Countryside (MAGIC) and the Natural England websites. Only findings relating to bats are detailed in this report. The full results are given in P.1202.19 *Ascerta preliminary Ecological Appraisal, Former Mondi Site, Feb 2020*.

Internal / External Inspection of the Building

A daytime external inspection of the building was carried out on 10th February 2020. The building was searched externally looking for signs of bats, including staining on barge boards, soffits and more commonly droppings on flat surfaces i.e. window ledges that would indicate potential roosting sites. Possible bat access points such as loose tiles, cracks and crevices or crawl spaces beneath and / or behind roofing materials such as roofing felt, panelling, soffits and tiles were identified and checked for signs of use by bats, for example droppings, scratch marks and staining. The structures were assessed for bat roost suitability as per Table 4.1 page 35 of the Bat Conservation Trust Guidelines (Collins, 2016). Structures assigned a suitability of **low** or above may require further inspection if they are to be lost to the development.

Preliminary Roost Assessment Trees

All tree(s) were inspected for Potential Roost Features (PRFs) during the preliminary ecological appraisal of the site in July 2019. Features searched for included: Natural or woodpecker holes, cracks / splits in major limbs, loose bark, hollows / cavities, dense epicormic growth, ivy cover, and bird and bat boxes. Where such features were found they were investigated for scratches or staining, bat droppings and smoothing of surfaces around entry points. The trees were assessed for bat roost suitability as per Table 4.1 page 35 of the Bat Conservation Trust Guidelines (Collins, 2016). Trees assigned a suitability of **moderate** or above may require further inspection if they are to be lost to the development.

Limitations

Due to safety concerns, access to the internal areas of the buildings was not possible at the time of the site visit, however the buildings could be fully examined externally with the aid of close focusing binoculars. Large sections of the roof at building B1 was missing, therefore any potential gaps in remaining sections could not be fully examined from ground level.

Due to health and safety reasons heras fencing was present around the buildings, small gaps under roof slates and between brickwork could not be fully examined for the presence of bats during the daytime survey.

The restrictions regarding access to the buildings are considered to have no limitations to the report conclusions

The bat survey was conducted at a time of year when bats are less active. Bats may be found in transition and hibernation roosts either singly, or in small groups. Insect prey is scarce and as Autumn comes to an end and temperatures drop, bats start to use their fat reserves to survive the winter. They will stay in a torpid state and if the temperature drops sufficiently will go into hibernation.

5.0 Survey Results and Evaluation

5.1 Site Description

The site contains a former mill and associated buildings. Habitats present within the site include dense scrubs, broad leaved scattered trees, scattered scrub, tall ruderal, semi natural broadleaved woodland, introduced scrub and a water course. These habitats are presented on plan P.1202.19.03 (**Appendix 1**).

The site lies adjacent to the local high street where shops and industrial mills lie to the north and west. The railway line borders the site to the west. The river Irwell meanders around the site boundary to the east, with a cricket and football ground located south of the site

The habitats are considered to be of value within the **Zone of Influence** of the site only. Their loss is not considered to adversely affect the local ecology. The broadleaved woodland is expected to be retained, and any loss can be mitigated for so as to ensure no net loss of biodiversity as a result of the proposals.

5.2 Record Search

The biological record search returned multiple records of bat signs and roosts were returned within 2km of the site. Species included bat sp., common pipistrelle, Daubenton's bat, Nathusius's pipistrelle, noctule bat, pipistrelle sp., soprano pipistrelle and whiskered / Brandt's bat. No records of bats within the site were returned.

The closest record was for a pipistrelle sp. signs approximately 45m southwest of the site

The closest roost to the site is a pipistrelle sp., roost and is located 300m north east.

Two European Protected Species Licence (EPSL) applications within 2km of the site since 2014 were identified using Magic Maps. These include:

- A license to allow for the damage of a resting place and destruction of a resting place for common pipistrelle and soprano pipistrelle (2014-5187-EPS-MIT) approximately 630m south west of the site; and
- A license to allow for impact on a breeding site, damage of a breeding site, damage of a resting place, destruction of a breeding site, and destruction of a resting place for common pipistrelle (2017-29122-EPS-MIT) approximately 1.2km north of site

5.3 External Inspection

The weather during the daytime building survey was cool (8°C), dry with $\frac{7}{8}$ cloud cover. There was a force 3 (Beaufort scale) gentle breeze during the survey. These weather conditions were considered suitable for this type of survey.

Building	Photograph
Building B3 is a detached two-story building constructed of brickwork walls and a pitched slate roof. The building has been unoccupied for several years and in a poor state of repair. The eastern elevation of the building, which was formerly the main entrance area has been faced with stone block and cavity wall brick work visible to the southern elevation. Small gaps were visible under the ledges above and below the windows. The windows on the eastern aspect are timber frame and all have broken glass. The doors are also timber, not secure and have broken glass. Gaps were noted within the wooden window frames that may provide potential roost features for bats. To the southern elevation there is a part demolished extension to the buildings, the remains indicate that the section of the building was constructed from solid brick work walls. Visible gaps and areas of missing mortar were visible within the remaining wall of the building and within the areas of demolished walls. The roof was in a very poor state of repair with large areas of the slate roof tiles missing, exposing the pitched roof beams and supports. In the areas where the roof is intact visible gaps were noted along the ridge line and small gaps were visible with the aid of binoculars under the roof tiles. To the northern and southern aspects of the roof gaps were identified under the flashing. Vegetation including buddleia has colonised in sections of the building, including around door and window frames, short ephemeral vegetation has colonised on the ground floor	 B3 Eastern elevation  B3 Southern elevation  B3 Buddleia around a first-floor window  B3 Visible gaps within stonework

window frames and moss was noted within the brickwork.

Woodpigeons were noted within the building during the external inspection.

The building was secured by heras fencing and no internal access to the building was available due to health and safety precautions.

No signs of bats were noted during the external inspection, including no evidence of dropping, staining or scratching. Although the building is relatively exposed due to the missing roof, a number of features including the gaps within mortar, gaps surrounding the flashing and gaps within the cavity brick work walling could provide potential roost access points for bats. The building will be lost within the current planning application. The building has been assessed to provide **moderate** bat roost potential for cavity and void dwelling species and will require a minimum of two nocturnal surveys for bats between May and August in suitable weather conditions.

If bats are found to using the building as a roost, then a licence application to Natural England will be required for the destruction of a bat roost.



B3 from the northern elevation

Building B2 is a two-storey building constructed from a mixture of cavity and solid brickwork and stone walls with a pitched roof. To the eastern elevation of the building there is a single storey brick extension with a sloped roof. Evidence of a single storey extension that has been demolished to the south elevation of the building was noted. The windows throughout the building were all upvc frames with missing glass, the windows to the ground floor were all boarded over. The main entrance door is a wooden frame with missing glass panels.

No roof tiles were visible from the external of the building, however the frames from sky light windows were noted.

Buddleia was noted growing from the brickwork throughout the building.



B2 eastern elevation with single storey extension

During the external inspection gaps and cracks were noted throughout the stonework, with small missing areas of mortar between the brickwork. A metal supporting beam was visible on the eastern elevation with gaps noted between the frame and brickwork within the walls. Woodpigeons and crows were noted within the building during the external inspection. A great tit was also noted sheltering under the metal support beam to the eastern elevation. The building was secured by heras fencing and no internal access to the building was available due to health and safety precautions. No signs of bats were noted during the external inspection, including no evidence of dropping, staining or scratching. Although the building is relatively exposed due to the missing roof, a number of features including the gaps within mortar, gaps surrounding the metal support beam and within the stone walling could all provide potential roost access points for bats. The building has been assessed to provide **moderate** bat roost potential for cavity and void dwelling bats. The building will be retained within the proposals and will not require nocturnal surveys for bats within the current planning application.



B2, demolished section to the southern elevation



B2 Ground floor boarded up window



B2 Supporting beam to the eastern elevation

Building B1 is the most northern structure within the site and is a detached two storey building. The walls of the building are of stonework construction with a pitched slate roof. To the southern elevation of the building there is a demolished extension that leaves an exposed cavity wall with visible gaps within the mortar and sections of missing mortar. The brickwork is in good condition within the main building and all the visible roof tiles were in place, with no noticeable slipped or missing tiles.



B1 Eastern elevation

Small gaps were visible under the ridge line and under roof tiles. Gaps were also present within the flashing to the northern and southern elevations. To the eastern elevation gaps were noted under the overhanging areas of the stonework. All the windows and doors were boarded over with wooden panels, gaps were noted surrounding boarding at the windows on the eastern elevation.

The building was secured by heras fencing and no internal access to the building was available due to health and safety precautions.

No signs of bats were noted during the external inspection, including no evidence of dropping, staining or scratching. The building has been assessed to provide **low** bat roost potential for cavity and void dwelling bats. The building will be retained within the proposals and will not require nocturnal surveys for bats within the current planning application.



B1 Visible gaps within the ridge line and surrounding flashing



B1 Visible gaps beneath stone window ledge

A chimney is present to the north of building B3 and is a solid brickwork constructed building. No windows or doors are present. The brick work is in a good condition, with acceptance to a few visible gaps and cracks with the aid of close focusing binoculars. Ventilation bricks were noted within the lower sections of the chimney. The building has been assessed to provide **low** bat roost potential for cavity and void dwelling bats. The building will be retained within the proposals and will not require nocturnal surveys for bats within the current planning application.



The daytime building inspection was conducted on the 17th February 2020, which is an appropriate time of year for daytime inspections. Collins (2016) recommend that roosts with **moderate** potential roost suitability should be visited nocturnally a minimum of two times, between May and August. Bat roost types and active periods are described in Table 3.1 of the Good Practice Guidelines (Collins, 2016).

5.5 Other wildlife

Wood pigeons were noted within B2 and B3, crows were also noted within B2. A great tit was noted sheltering under the metal support beam on the eastern elevation of B2. The site offers habitat for other species throughout and sits within a wider area of good habitat. Recommendations for avoiding harm to other protected species have been made in the report *P.1202.19 Ascerta Preliminary Ecological Appraisal Report, Mondri Site, Holcombe Mill Aug '19*.

5.6 Evaluation

Building B3 will be lost within the proposals and provides roost potential for cavity and void dwelling bat species, this however is limited as the building is unheated and in a deteriorating state of repair. Due to the openness of the building it is not suitable for maternity or hibernation roosts. Buildings B1, B2 and the chimney will be retained within the proposals and will require no further nocturnal surveys for bats within the current planning application. If the buildings are included within future stages of works, they will require a further daytime survey to assess for potential bat roost features.

Features on the buildings within the site have a potential for supporting bat roosts and bats are known to move roosts often. If works are not begun by May 2021, a further daytime assessment or nocturnal survey may be required to confirm bats are not using building B3 as a roost. If a bat roost is identified on the site and is likely to be affected by the development, an application to Natural England will need to be made with regards to acquiring a European Protected Species licence in order that the bat roost can be destroyed in the appropriate manner.

The building provides bird nesting opportunities and mitigation will be required to ensure no net loss of nesting habitat following development. Breeding birds are protected and should not be disturbed during building works. In order to avoid harm to nesting birds, vegetation clearance and building works should not be undertaken during the bird breeding season (between 1st March and 31st August). If vegetation needs to be cleared during this period a nesting bird survey will be required, conducted by a suitably qualified ecologist before works begin. If any active nests are observed during the survey, exclusion zones will be set up and works will not occur in these areas until nesting is complete

6.0 Recommendations and Conclusions

Recommendations

The following recommendations are made such as to satisfy current wildlife guidance and legislation including the NPPF and Policy EN6 of the Bury Council Unitary Development Plan (UDP).

1. A minimum of two nocturnal surveys to be carried out at building B3 between May and August (in suitable weather conditions) to assess for the presence of roosting bats;
2. The roof and ridge tiles should be removed using Reasonable Avoidance Measures to ensure no harm to bats that may roost within the property opportunistically over the summer;
3. Mitigation for loss of bat roosting habitat by the installation of one bat box / bat brick installed onto a new building within the proposals;
4. Retaining the value of the site for foraging and commuting bats by ensuring lighting does not exceed current levels and is sensitive to the needs of bats. Light spill will need to avoid retained and off-site habitats, through the use of lamps fitted with filters or hoods to reduce light spill. Alternatively, sensors installed so that lighting is only activated when required as per advice within the Bats and Lighting in the UK (2018) document;
5. Enhancing the site for bats with 15 bat boxes / bat bricks on retained trees or buildings within the site, along with tree planting and hedgerow planting with native species;
6. Works to the building / vegetation clearance should occur outside the period 1st March to 31st August to protect breeding birds, unless an ecologist has confirmed that the actions proposed will not disturb bird breeding on the site; and
7. In order to mitigate for the loss of bird nesting habitat it is recommended that two open fronted nest boxes, one house sparrow terrace and one swift nest box should be fitted to the newly constructed buildings on the site.

7.0 References

Ascerta (2019) *Preliminary Ecological Appraisal*

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Appendix 1



KEY

 Potential access points

 Buildings

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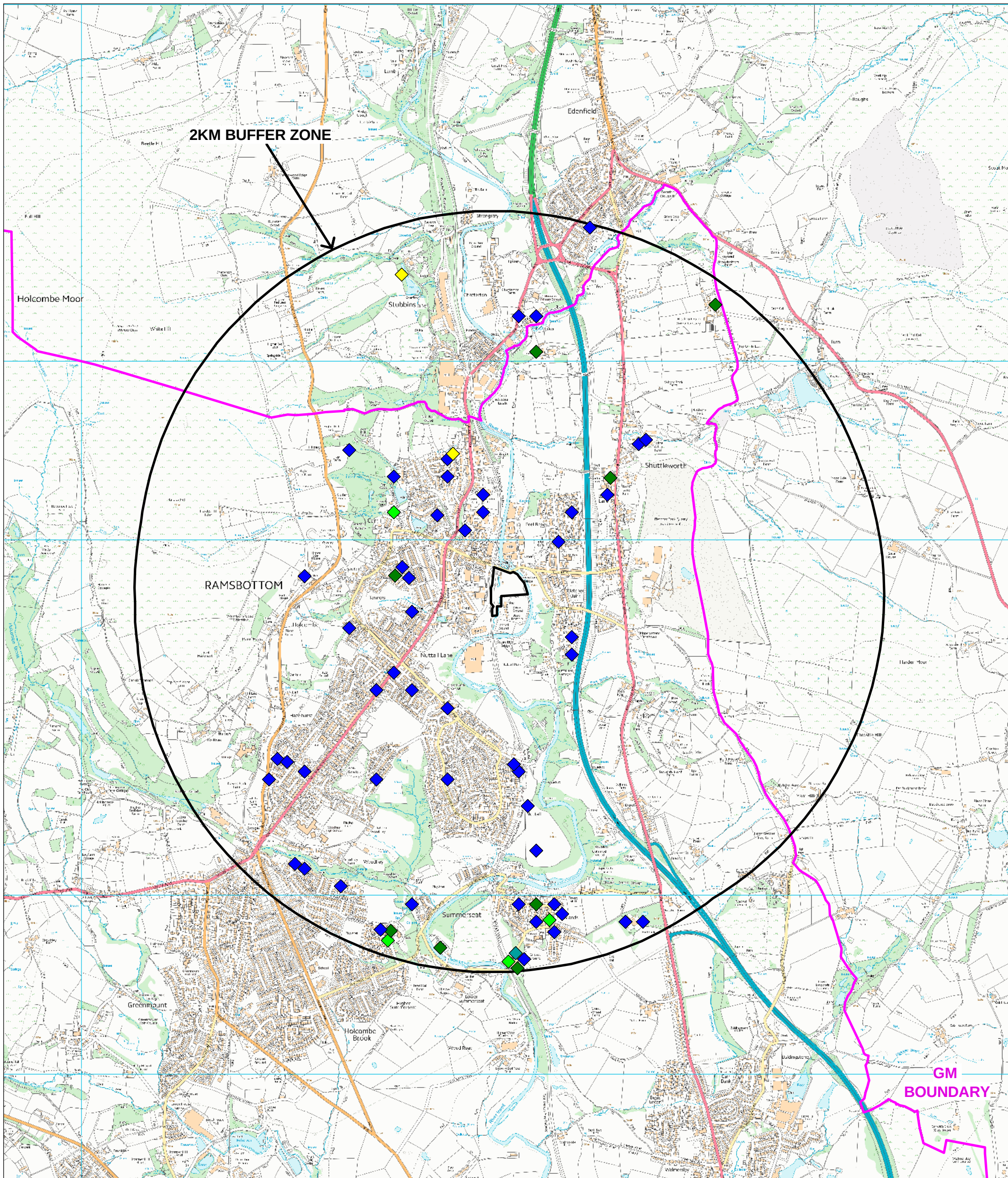
CLIENT:
Eccleston Homes

PROJECT:
Former Mondri Site, (site 1) Holcombe Mill,
Bridge Street, Ramsbottom, BL0 0BS

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Preliminary Bat Roost Assessment

SCALE: NTS@A3	DRAWN BY: TA	DRAWING No: P.1202.19.08
DATE: 17/02/2020	CHKD BY: NE	REV: -

Appendix 2



KEY
BAT ROOSTS

- ◆ BAT SP
- ◆ COMMON PIPISTRELLE
- ◆ PIPISTRELLE SP
- ◆ SOPRANO PIPISTRELLE
- ◆ WHISKERED/BRANDT'S BAT

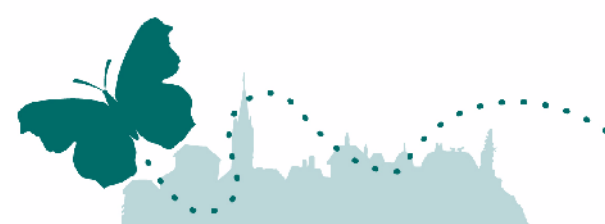
GREATER MANCHESTER ECOLOGY UNIT
ECOLOGICAL SEARCH - SD 7939 1675
MONDI HOLCOMBE MILL - MAP 4A

SCALE 1:20,000

BAT DATA COURTESY OF SOUTH LANCS BAT GROUP

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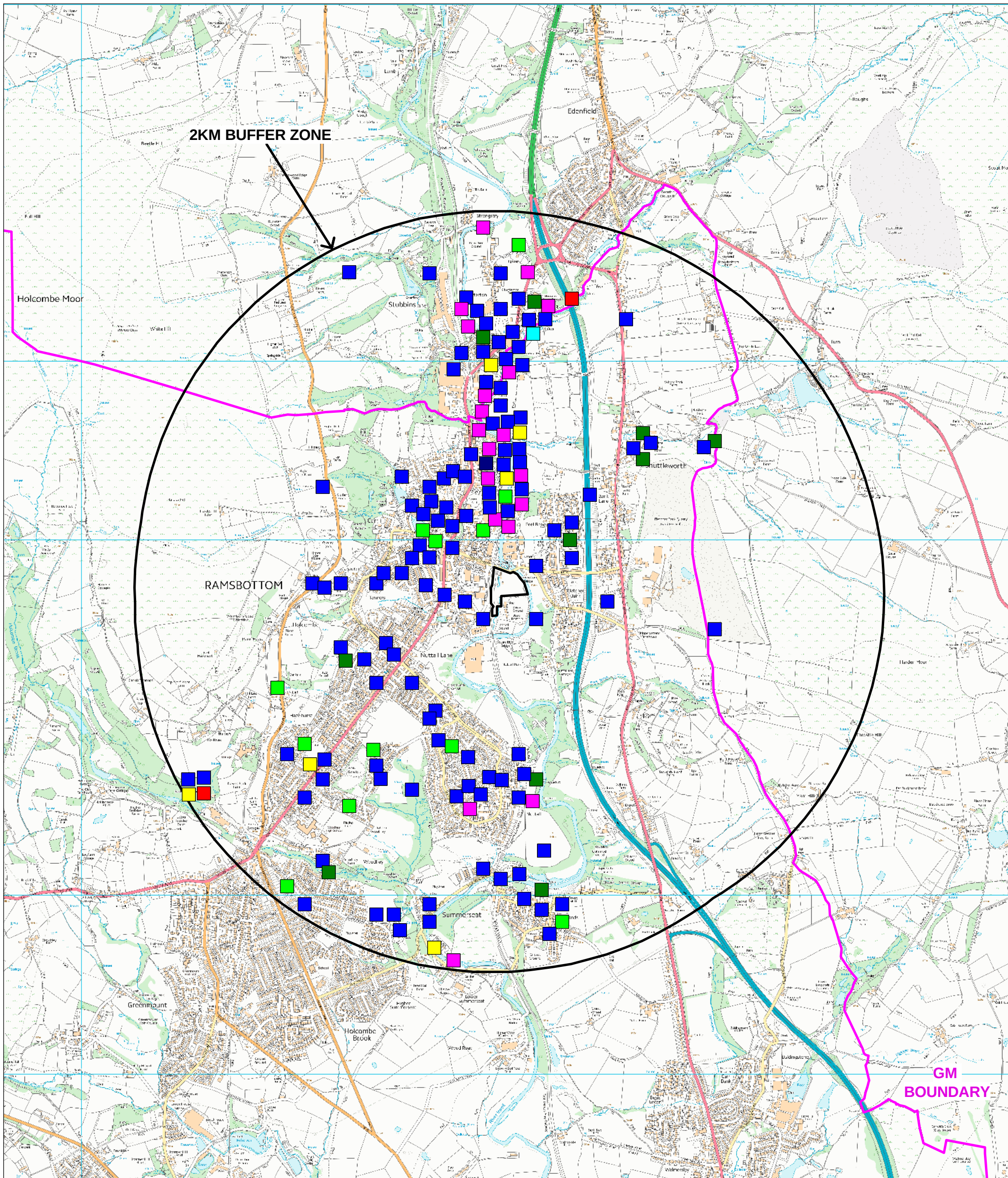
TAMESIDE MBC LICENCE NO LA100022697, 2019



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Date Produced: 03/07/2019



KEY
BAT SIGNS

- BAT SP
- COMMON PIPISTRELLE
- DAUBENTON'S BAT
- NATHUSIUS'S PIPISTRELLE
- NOCTULE BAT
- PIPISTRELLE SP
- SOPRANO PIPISTRELLE
- WHISKERED BAT

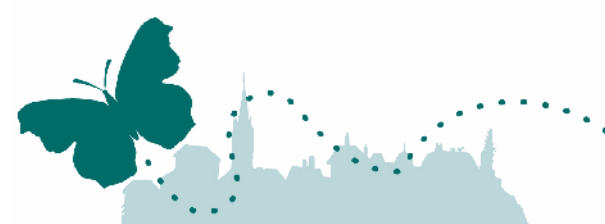
GREATER MANCHESTER ECOLOGY UNIT
ECOLOGICAL SEARCH - SD 7939 1675
MONDI HOLCOMBE MILL - MAP 4B

SCALE 1:20,000

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