

Agenda Item No. 3.2

**DERBYSHIRE COUNTY COUNCIL**  
**REGULATORY – PLANNING COMMITTEE**

**4 February 2019**

Report of the Strategic Director – Economy, Transport and Environment

**2 CONSTRUCTION OF AN 80 SPACE CAR PARK, OVERFLOW CAR PARK AND ACCESS ROAD ON LAND WITHIN THE FORMER LODGE HOUSE SURFACE MINE, HEANOR ROAD, SMALLEY**  
**APPLICANT: THE WOODLAND TRUST**  
**CODE NO: CM6/1018/59**

**6.430.14**

**Introductory Summary** This proposal is for the construction of a car park and access road on land formerly part of the Lodge House opencast coal site.

In considering the proposals, I have had regard to concerns relating to development in the Green Belt, landscape and visual amenity, ecology and highway impacts, and I am satisfied that the effects of the development can be managed and mitigated through an appropriate suite of conditions. The development is considered to be in accordance with the development plan and is therefore recommended for approval.

(1) **Purpose of Report** To enable the Committee to determine the application.

(2) **Information and Analysis**

**Background**

Lodge House Surface Coal Mine, which the application site lies within, was operational between 2009 and 2016 and covered an area of 200 hectares (ha) south-east of the A608 between Smalley and Shipley Country Park. This land is now in the statutory aftercare period which is intended to see the restoration plan firmly established. The restoration plan returns the land to a mixture of agricultural and amenity uses whilst enhancing biodiversity and ensuring that the land is in keeping with the character of the local landscape. The land is also the subject of a 20 year Habitat Management Plan under a Section 106 Agreement.

The Woodland Trust is in the process of acquiring the site, and states that its intention is “*to enhance the former surface mine area for nature conservation*”

*and wider environmental purposes and to unlock the recreational and educational potential of the area by improving public access”.*

### **Site and Surroundings**

The site covers an area of 3.7ha of pasture land, south of the A608 Heanor Road, leading from the former access point to the former Lodge House Surface Mine, along the former line of the access road to a field parcel 500 metres (m) south-east of the access. The site lies wholly within the restored Lodge House Surface Mine site and within the Green Belt. The nearest residential property lies approximately 25m from the access to Heanor Road and 500m for the car park site. There are no designated sites in close proximity to the application site. Two public footpaths (AV26/2/1 and AV26/1/3) cross the proposed access road. The site lies within Flood Zone 1 which means that it has a 0.1% annual risk of a flood event.

### **The Proposals**

The application is for the creation of 80 permanent car parking spaces, four disabled persons parking bays with accessible footpaths and two coach parking bays. The proposals also include a grassed central area to be used for overflow car parking with capacity for 160 vehicles to be available during temporary events, such as tree planting and artisan craft working days. The development would utilise a sustainable urban drainage system using permeable surfacing materials.

The car park design incorporates a one-way circular system, containing an area for overflow parking in the centre. There would be provision for 80 parking bays set at a 45<sup>0</sup> angle to the road with soft landscaping and hedgerow planting to the surrounds to provide visual screening and incorporate the car park into the agricultural field setting. Angled parking would allow the proposed road to be narrowed to 3.7m in width in order to reduce the overall area of hard surfacing. The one-way system around a large, open green space, is intended to provide the design with a sense of openness and maintain the countryside character.

The open green space in the centre could also be utilised as an occasional event space and overflow parking when required. Further overflow parking, if necessary, would be accommodated to the immediate south of the built car park via a gated access. All overflow parking would be marshalled by the Woodland Trust. Event days, such as tree planting and artisan craft working, provide the Woodland Trust with the opportunity to engage directly with the local community and to encourage outdoor activities.

An entrance space would be located to the north-eastern corner of the site connecting with the existing footpath network and the wider countryside. Seating for large groups to gather, an estate map and visitor information would also be provided in this area, and a pop-up visitor centre trailer would

occasionally be parked to advertise membership to the Woodland Trust. Coach parking facilities for local school groups to visit and disabled persons bay parking on the northern boundary of the proposed car park, close to the entrance point to the wider site, would also be provided.

The car park would be set within an extensive planting scheme utilising native tree and shrub species, and low growing plants to maintain intervisibility across the car park for security.

Access to the car park would be from Heanor Road to the north-west via the existing entrance. This road would follow the approximate alignment of the original Lodge House Surface Mine haul road. The proposed road would accommodate two raised pedestrian crossing points, where public footpaths cross the road and two animal crossing points, as agreed with the local farmer. The entrance at Heanor Road would include a height restriction barrier and gates to allow the Woodland Trust full control of the car park and prevent misuse of the site. Native species hedgerow would be used to screen vehicles and the road itself from the local residential properties, as well as assimilating the road into the landscape. A pedestrian footpath adjacent to the road would allow walkers to utilise the same route and connect with the existing footpath network.

## **Consultations**

### **Local Member**

Councillor Buttery has been informed of the details of the proposals.

### **Amber Valley Borough Council**

The Amber Valley Borough Council (AVBC) raised initial objections to the proposal as it considered the use of tarmac, as a surface material, to be inappropriate for the location in the Green Belt as it considered that it would have a detrimental visual effect on the Green Belt within the countryside.

It added that should a suitable alternative surface material be forthcoming from the applicant, AVBC would like an additional opportunity to comment on the proposal. The applicant subsequently submitted a justification for the choice of surfacing material. This was forwarded to the Council which then responded that it had no further comments to make.

### **Smalley Parish Council**

No objections.

### **Environment Agency**

The Agency has no objections.

### **Natural England**

Natural England advised that it had no comments to make on the proposals.

### **Derbyshire Wildlife Trust**

Having reviewed the submitted Ecological Appraisal, Derbyshire Wildlife Trust (DWT) advise that there are unlikely to be any ecological impacts and issues arising with this application.

DWT notes that the Woodland Trust intends to undertake the ecological improvements included in the existing 20 year management plan associated with the opencast coaling permissions as part of the Vision Statement to provide a landscape that has diverse natural habitats. DWT commends and welcomes this strategy and considers that the formation of a new car park and access road would provide access to enable this vision to be achieved.

DWT also notes that the proposal requires the removal of two short sections of native hedgerows but considers that this will be adequately compensated for by new native-species hedgerow planting set out in the Landscape Masterplan. To avoid harm to nesting birds, DWT advises that a condition for the protection of breeding birds is attached to any permission.

### **Local Highway Authority**

There are no highways objections subject to a series of conditions relating to highways safety and the design of the access onto the A608 Heanor Road.

There remains a legal agreement under the Highways Act 1980 in place between the County Council and the owners of the site which requires the formal closure of the access onto Heanor Road, including stopping-up of highway within the junction. Irrespective of this planning application, this issue will need to be resolved and could be formalised by a Deed of Variation. The onus is ultimately on the landowners to resolve and they should contact the Highway Authority to pursue this matter.

The current proposals would maintain the existing entrance in its current form which, having been laid out for heavy goods vehicles (HGVs) is wide, but introduce a splitter island to reduce the width for pedestrians to cross.

The splitter island is located within the adopted highway and the design and construction will all need to be to the satisfaction of the Highway Authority, as submitted, the design is considered to be acceptable in principle, although it will be subject to detailed design and a legal agreement. As the proposals intend to take coaches into the site, the detailed design of the splitter island will need to include swept path analysis to ensure that their manoeuvring is not impeded.

Notwithstanding the above issues, the existing access includes a right turn harbourage and has good visibility, therefore, the Highways Officer considers it is appropriate to accommodate the scale of development proposed.

### **Lead Local Flood Authority - Flood Risk Management Team**

The Lead Local Flood Authority (LLFA) has no objections and welcomes the use of infiltration as the primary means of disposing of surface water. However, it considers that the submission of detailed schemes for the design and associated management and maintenance plan of the surface water drainage for the site, construction drainage management, and compliance with the drainage hierarchy, as set out in Paragraph 80 of the planning practice guidance, to be necessary.

### **The Coal Authority**

The Coal Authority states that its general approach, in cases where development is proposed within the Development High Risk Area, is to recommend that the applicant obtains coal mining information for the application site and submits a Coal Mining Risk Assessment to support the planning application. However, when considering the nature of this particular development proposal for a car park and alterations to an access road, on the basis these development activities will not require substantial foundations or earthworks (as shown in “Proposed Road Detail: Revision B” and “Proposed Car Park Layout: Revision A”), the Coal Authority considers that requiring a Coal Mining Risk Assessment would not be proportionate to the scale and nature of the development proposed in this particular case and does not object to this planning application. In the interests of public safety, however, the Coal Authority recommends that, should planning permission be granted for this proposal, an Informative Note, recommending that the applicant carry out an assessment of the risks from former mine workings, is appended within the Decision Notice. The applicant has subsequently submitted such an assessment, although this is not a requirement of the Coal Authority in respect of this application.

### **Severn Trent and Western Power**

Requested to respond by 18 November 2018.

### **Publicity**

The application was advertised by site and press notices with a request for observations by 6 December 2018.

Three representations stating objections to the proposal were received. These queried the need for the car park as there are existing car parks at Shipley Country Park and Mapperley Reservoir, and considered that the development would destroy the restoration of pasture in the Green Belt following the opencast coal operations.

A letter was also received from the Forestry Commission (FC). The FC is not a statutory consultee in this matter and, as a Government Department, cannot support or object to applications for planning approval. However, the FC considered it informative to provide a 'small snapshot' of the body of academic research pointing to the benefits of trees and woodland with public access to human health and wellbeing (the letter lists a number of academic papers on the benefits of trees and woodland environments). It also noted that lack of access to woodland is a primary barrier in preventing proper woodland management and financial sustainability for many woodlands across England over the long term.

## **Planning Considerations**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In relation to this application, the relevant policies of the development plan are contained in the saved policies of the adopted Derby and Derbyshire Minerals Local Plan (MLP) and the adopted Amber Valley Borough Local Plan (AVBLP). The National Planning Policy Framework (NPPF) (July 2018) and the National Planning Practice Guidance are also material considerations.

The most relevant development plan policies for this proposal are:

### **Amber Valley Borough Local Plan**

EN1: Development in the Countryside.

EN2: Green Belt.

EN7: Landscape Character.

LC6: Leisure Facilities.

TP1: Impact on Transport.

### **Derby and Derbyshire Minerals Local Plan**

MP10: Reclamation and After-Use.

### **Submission draft Amber Valley Local Plan**

AVBC submitted a new Amber Valley Local Plan for consideration by the Secretary of State in March 2018. Following a recent suspension by the Inspector of the Examination in Public until April 2019, pending a Green Belt review to inform housing land supply in the Borough, it is not anticipated that the emerging plan will be adopted before early 2020. Whilst the policies included in the submitted plan are therefore a material consideration in the determination of this application, they are only of limited weight.

### **National Planning Policy Framework**

A revised NPPF was published in July 2018. The NPPF provides guidance on material considerations in the context of determining planning applications. It

states that the purpose of the planning system is to help deliver sustainable development and adds that there should be a presumption in favour of sustainable development. The term sustainable development is not defined as such, but is said to have interrelated economic, social and environmental aspects. The economic aspect is to provide sufficient land for the right type of development, in the right place at the right time. The social role is to support strong and vibrant communities by providing for the needs of the community whilst fulfilling the environmental role of protecting and enhancing the natural, built and historic environment.

## **Key Considerations**

### **Location, Scale and Design**

The proposed development would be within the countryside and Green Belt, therefore, particular consideration must be given to whether this would be an appropriate development in this location.

The NPPF, at Paragraph 146, states that certain forms of development, including use for outdoor recreation, are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.

AVBLP saved Policy EN1 sets broad requirements on development outside the built framework of settlements, including that it is necessary within the countryside and cannot reasonably be located within an existing settlement. AVBLP Policy EN2 sets out the types of development considered to be appropriate within the Green Belt. These include essential facilities for outdoor recreation which would preserve the openness of the Green Belt and not conflict with the purposes of including land within the Green Belt. AVBLP Policy EN7 requires that the design of development is appropriate to local landscape character. Policy LC6 states that planning permission will be granted for the provision of new leisure facilities providing that in rural areas, the proposals are either within or immediately adjoining existing villages, are well linked to the existing footpath network and of an appropriate scale and design which reflects the character of the village and the surrounding countryside.

DDMLP Policy MP10 requires that the restoration of mineral sites should be designed to enhance the natural environment, including measures such as the provision of additional trees and woodland cover. Planning Practice Guidance, at Paragraph 46, states that there are many possible uses of land once minerals extraction is complete, and restoration and aftercare of land is complete, including; the creation of new habitats and biodiversity, use for agriculture, forestry and recreational activities.

The Woodland Trust refers to the proposed car park as “an informal recreational facility” which “has been designed to reflect the setting and character of its surroundings”.

I consider that establishment of a car park would facilitate recreational and educational enjoyment of the countryside. The location of the car park would be within a small field parcel 500m from the nearest residential properties, in a location that is very well screened by existing hedgerows and trees. The infrastructure of the car park itself would be kept to a minimum and use materials appropriate to a countryside location, such as the use of geocellular construction re-enforcing matting to grassland areas for the parking spaces. I consider that the design of the proposed development would serve to preserve the openness of the Green Belt and would be in keeping with the character of the local landscape.

The current use of the land is as a parcel of unenhanced grassland within the restored former Lodge House site. Because of this there would be no loss of the ecological habitat enhancements established as part of the restoration of the open-casting, as these enhancement features have been established on other parts of the Lodge House site.

The retention and modification of the established entrance onto the A608 Heanor Road would be designed to soften its appearance and be more in keeping with a low key public access use. The new access road would be of a scale and design akin to a country lane and would be screened by hedgerows.

Whilst I am satisfied that the risk of flooding associated with the proposed development is negligible, I share the LLFAs concerns regarding localised flood events and the management of water from the site. I therefore concur with the LLFA appraisal and recommend conditions to mitigate these risks.

Taking these factors into account, I am satisfied that the development would be of an appropriate scale and design for the location, and that there would be no significant adverse impacts on the Green Belt, countryside character, and local amenity associated with the development. I therefore consider the development accords with policies EN1, EN2, EN7 and LC6 of the AVBLP and MP10 of the DDMLP.

### **Transport and Access**

AVBLP saved Policy TP1 requires that all development proposals should be able to obtain satisfactory access to the transport network. Proposals that would generate significant demand for additional journeys by car will need to be accompanied by a transport assessment and, where appropriate, a travel plan. Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable



impact on highway safety or the residual cumulative impacts on the road network would be severe.

The Highways Officer considers the proposal to be acceptable in highways terms and has stipulated conditions for the management of traffic movements and safety during the construction and operational phases of the development, and for traffic management measures at the site access onto the A608 Heanor Road. Taking into account the conclusions of the Highways Officer, I am satisfied that the impacts of the development on the local road and footpath network, and on local amenity, would be acceptable subject to conditions as set out above. I therefore consider the development accords with the requirements of saved Policy TN1 of the AVBLP and the NPPF.

### **Conclusion**

In conclusion, I am satisfied that the development would be in accordance with the development plan, subject to the recommended conditions. I am satisfied that the proposal would not conflict with national or local planning policies and it is therefore recommended for approval.

(3) **Financial Considerations** The correct fee of £234 has been received.

(4) **Legal Considerations** This is an application submitted under Part III of the Town and Country Planning Act 1990, which falls to this Authority to determine as the Mineral Planning Authority.

I do not consider that there would be any disproportionate impacts on anyone's human rights under the European Convention on Human Rights as a result of this permission being granted subject to the conditions referred to in the Officer's Recommendation.

(5) **Environmental and Health Considerations** As indicated in the report.

### **Other Considerations**

In preparing this report the relevance of the following factors has been considered: prevention of crime and disorder, equality and diversity, human resources, property, social value and transport considerations.

(6) **Background Papers** File No. 6.430.14  
Application documents received from Appletons on behalf of The Woodland Trust dated 10 October 2018. Correspondence dated from October 2018 to January 2019.

Letter from the Environment Agency dated 29 October 2018.

Letter from The Coal Authority dated 6 November 2018.

Letter from Natural England dated 7 November 2018.

Letter from Amber Valley Borough Council dated 8 November 2018 and email dated 2 January 2019.

Email from the Flood Risk Management Team dated 13 November 2018 and 16 January 2019.

Email from the Highways Officer dated 13 November 2018 and 15 January 2019.

Email from the Conservation and Design Team dated 16 November 2018.

Email from Smalley parish Council dated 20 November 2018.

Email from Derbyshire Wildlife Trust dated 4 December 2018.

Representation from the Forestry Commission dated 23 November 2018.

Representation from members of the public dated 27 and 30 November 2018 and 14 January 2019.

(7) **OFFICER'S RECOMMENDATION** That the Committee resolves that planning permission is **granted** subject to the following conditions:

**Commencement and Duration**

- 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 Details**

- 2) Except as may be required by the other conditions to this permission, the development shall take place in accordance with the details set out in the application for planning permission and the accompanying documentation, registered as valid on 10 October 2018. The key application documents are set out below:

- Application form dated 10 October 2018
- Site Location Plan – drawing number 2211\_01 Revision A
- Landscape Masterplan – drawing number 2211\_02 Revision A
- Proposed Car Park Layout – drawing number 2211\_03 Revision A
- Proposed Road Detail – drawing number 2211\_04 Revision D
- Access Mitigation - drawing number J1016 access fig 1
- Flood Risk Assessment and Drainage Strategy January 2019
- Planning Statement October 2018
- Design and Access Statement October 2018

**Reason:** To ensure conformity with the details of the application that is approved and to clarify its scope.

### Further Schemes to be submitted

- 3) No development shall take place until a detailed design and associated management and maintenance plan of the surface water drainage for the site, in accordance with the principles outlined within:

- a. Flood Risk Assessment and Surface Water Drainage Strategy for Proposed Car Park and Access Road, Lodge House Surface Mine, Smalley, Derbyshire, Issue 2, Cole Easdon Consultants Limited (January 2019), including any subsequent amendments or updates to those documents as approved by the Flood Risk Management Team; and
- b. The Department for the Environment, Food and Rural Affairs (DEFRA's) Non-statutory technical standards for sustainable drainage systems (March 2015);

have been submitted to and approved in writing by the Mineral Planning Authority. The approved drainage system shall be implemented in accordance with the approved detailed design, prior to the use of the car park commencing.

**Reason:** To ensure that the proposed development does not increase flood risk and that the principles of sustainable drainage are incorporated into this proposal, and sufficient detail of the construction, operation and maintenance and management of the sustainable drainage systems are provided to the Mineral Planning Authority prior to commencement of development.

It is considered that compliance with these requirements would only be effective if details of the construction, operation and maintenance and management of the sustainable drainage systems are found to be acceptable and approved as such, prior to the commencement of the development.

- 4) No development shall take place until a detailed assessment to demonstrate that the proposed destination for surface water accords with the drainage hierarchy (as set out in Paragraph 80 of Planning Practice Guidance) has been submitted to and approved in writing by the Mineral Planning Authority.

**Reason:** To ensure that surface water from the development is directed towards the most appropriate waterbody in terms of flood risk and practicality by utilising the highest possible priority destination on the hierarchy of drainage options. The assessment should demonstrate with appropriate evidence that surface water run-off is discharged as high up as reasonably practicable in the following hierarchy:

- I. into the ground (infiltration);
- II. to a surface water body;
- III. to a surface water sewer, highway drain, or another drainage system; and
- IV. to a combined sewer.

It is considered that compliance with these requirements would only be effective if details of the destination of surface water from the development are found to be acceptable and approved as such, prior to the commencement of the development.

- 5) Prior to commencement of the development, a detailed scheme, setting out how additional surface water run-off from the site will be avoided during the construction phase, shall be submitted to and approved in writing by the Mineral Planning Authority. The scheme shall be implemented as approved.

Note: The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved system shall be operating to the satisfaction of the Mineral Planning Authority, before the commencement of any works, which would lead to increased surface water run-off from site during the construction phase.

**Reason:** To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land or property.

It is considered that compliance with these requirements would only be effective if details of the management of how additional surface water run-off from the site will be avoided during the construction phase are found to be acceptable and approved as such, prior to the commencement of the development.

- 6) Prior to the commencement of the development, details showing the means to prevent the discharge of water from the development onto the highway shall be submitted to and approved in writing by the Mineral Planning Authority. The approved scheme shall be undertaken and completed prior to the first use of the access and retained as such thereafter.

**Reason:** In the interests of highway safety.

It is considered that compliance with these requirements would only be effective if the risk of the discharge of water from the site onto the highway is found to be acceptable and approved as such, prior to the commencement of the development.

- 7) Before any other operations are commenced, space shall be provided within the site for storage of plant and materials, site accommodation, loading, unloading and manoeuvring of goods vehicles, parking and manoeuvring of employees and visitors vehicles, laid out and constructed in accordance with detailed designs first submitted to and approved in writing by the Mineral Planning Authority. Once implemented, the facilities shall be retained free from any impediment to their designated use throughout the construction period.

**Reason:** In the interests of local amenity and the environment.

It is considered that compliance with these requirements would only be effective if the location and layout of the site compound is found to be acceptable and approved as such, prior to the commencement of the development.

### **Protected Species**

- 8) No removal of hedgerows, trees or grassland habitat shall take place between 1 March and 31 August inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

The written confirmation shall be submitted to the Mineral Planning Authority within 7 days of the assessment.

**Reason:** To protect nesting birds.

### **Highway Safety**

- 9) The development shall not be taken into use until the pedestrian splitter island, shown on drawing number J1016 access fig 1, has been fully constructed in accordance with a detailed design first submitted to and approved in writing by the Mineral Planning Authority in consultation with the Highway Authority.

**Reason:** In the interests of highway safety.

- 10) The development shall not be taken into use until the proposed access road has been laid out in accordance with the application drawings, surfaced in a solid bound material for the first 5 metres from the highway and any gates shall be located 5 metres from the highway boundary and hung so as to open inwards only.

**Reason:** In the interests of highway safety.

- 11) Throughout the period of development, vehicle wheel cleaning facilities shall be provided and retained within the site. All construction vehicles shall have their wheels cleaned before leaving the site in order to prevent the deposition of mud and other extraneous material on the public highway.

**Reason:** In the interests of highway safety.

### **Cessation of Use**

- 12) In the event of the operational development hereby approved being discontinued or the completed car park and access road under this permission falling out of use as such, within three months of that event the site shall be returned to a condition which is fully compatible with agricultural use.

**Reason:** To secure restoration of the site in the event of the development falling out of use.

### **Statement of Compliance with Article 35 of the Town and Country Development Management Procedure Order 2015**

The County Planning Authority worked with the applicant in a positive and proactive manner based on seeking solutions to problems arising in the processing of planning applications in full accordance with this Article. The applicant engaged in pre-application and post application discussions and meetings with relevant officers in the Authority, prior to the submission of the application.

In accordance with Section 100ZA of the Town and Country Planning Act 1990, as amended and the Town and Country Planning (Pre-Commencement Conditions) Regulations 2018 ('the Regulations'), the applicant has been provided with a draft schedule of the conditions attached to this report. The schedule includes pre-commencement conditions imposed at the request of the Highway Authority requiring the submission of detailed schemes for the highway access and site construction compound, and at the request of the LLFA requiring schemes relating to flood risk management. In accordance with Regulation 3(a) of the Regulations, the applicant has provided a substantive response to the effect that they agree with the imposition of this pre-commencement condition.

### **Footnotes**

- 1) Pursuant to Section 278 of the Highways Act 1980 and the provisions of the Traffic Management Act 2004, no works may commence within the limits of the public highway without the formal written Agreement of the County Council as Highway Authority. It must be ensured that public transport services in the vicinity of the site are not adversely affected by

the development works. Advice regarding the technical, legal, administrative and financial processes involved in Section 278 Agreements may be obtained from Highways Development Control at County Hall, Matlock (telephone: 01629 533190). The applicant is advised to allow approximately 12 weeks in any programme of works to obtain a Section 278 Agreement.

- 2) The applicant's attention is drawn to the extensive advice note – paragraphs A to K - appended to the letter from the LLFA dated 16 January 2019.

**Mike Ashworth**  
**Strategic Director – Economy, Transport and Environment**

## Location Plan CM6/1018/59

