



Penderfyniad ar yr Apêl

Ymchwiliad a gynhaliwyd ar:
1, 2, 3 & 04/03/22

Ymweliad â safle a wnaed ar: 15 & 16/03/22

gan **Richard E. Jenkins BA (Hons) MSc MRTPI**

Arolygydd a benodir gan Weinidogion
Cymru

Dyddiad: 18/05/2022

Appeal Decision

Inquiry held on:
1, 2, 3 & 04/03/22

Site visit made on 15 & 16/03/22

by **Richard E. Jenkins BA (Hons) MSc MRTPI**

an Inspector appointed by the Welsh
Ministers

Date: 18/05/2022

Appeal A - Ref: APP/R6830/A/19/3243545

Site address: Land to the north, west and east of Mindale Farm, Ffordd Hendre, off Ffordd Ty Newydd, Meliden, Prestatyn, LL19 8PG

The Welsh Ministers have transferred the authority to decide this appeal to me as the appointed Inspector.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr R. A. Roberts of Penrhyn Homes against the decision of Denbighshire County Council.
 - The development proposed is the demolition of existing dwelling and outbuildings, erection of 133 dwellings, construction of internal estate roads, sewers, SUDS drainage and open spaces, strategic and hard/ soft landscaping and ancillary works.
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Appeal B - Ref: APP/R6830/A/19/3243547

Site address: Land North of Meliden Road & West of Ffordd Ty Newydd, Meliden, Prestatyn, LL19 8RL

The Welsh Ministers have transferred the authority to decide this appeal to me as the appointed Inspector.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Mr R. A. Roberts of Penrhyn Ltd against the decision of Denbighshire County Council.
 - The development proposed is the construction of a New Road (approximately 400m in length) from Ffordd Talargoch (A547) to land at Mindale Farm, in association with application Ref: 43/2018/0750 for residential development on housing land allocation.
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Decisions

Appeal A - Ref: APP/R6830/A/19/3243545

1. The appeal is dismissed.

Appeal B - Ref: APP/R6830/A/19/3243547

2. The appeal is dismissed.

Preliminary Matters

3. As set out above, there are two appeals due for determination. For the avoidance of any doubt, Appeal A relates to LPA Ref: 43/2018/0750/PF, which sought planning permission for the demolition of existing dwelling and outbuildings at Mindale Farm and the erection of 133No. dwellings, construction of internal estate roads, sewers, SUDS drainage and open spaces, strategic and hard/ soft landscaping and ancillary works. Appeal B relates to LPA Ref: 43/2018/0751/PF, which sought planning permission for the construction of a new road from Ffordd Talargoch to land at Mindale Farm. Whilst materially different to the current proposals, it is relevant to note that there was previous appeal at the site under Appeal Ref: APP/R6830/A/17/3174131.
4. I shall determine each of the current appeals on their own particular merits. However, to avoid duplication, I shall set out my reasoning in this single document, albeit with separate formal decisions. The applications for an award of costs submitted by the appellant will however be the subject of a separate decision letter. It is also worth noting that, in drafting the above decision letter template, I have taken the description of development in respect of Appeal B from the Council's Notice of Decision. As this is broadly consistent with that outlined on the Appeal Form, I am satisfied that there is no prejudice in this respect.
5. Two separate planning obligations have been submitted under the provisions of Section 106 of the Act. Specifically, a legal agreement was submitted in respect of Appeal A, the effect of which would be to deliver contributions towards affordable housing, education provision and an off-site public footpath, as well as arrangements for the provision of open space. There remains a dispute regarding the necessary financial contribution towards education facilities and this has been reflected by a blue pencil clause within the obligation. Having heard the arguments surrounding this issue, I am satisfied that the Council's calculation is based upon a reasonable approach that is advocated through its adopted Supplementary Planning Guidance (SPG) note entitled '*Planning Obligations*' (2016). As such, and in the absence of any cogent arguments to lead me to a contrary view, I find that the reduced figure advocated by the appellant fails to meet the relevant tests. I am satisfied that all of the other covenants, including the £398,720.00 education contribution, meet the legislative and policy tests and should therefore carry weight in the decision making process.
6. A Unilateral Undertaking that would prevent the developer from implementing any planning permission associated with Appeal B without the necessary permission for residential development proposed under Appeal A has also been executed. The main parties have had the opportunity to submit representations in respect of these matters and it appears to be common ground that such an undertaking is necessary and otherwise compliant with the relevant tests. I have no reason to come to a different conclusion on this matter and shall attribute the undertaking appropriate weight.
7. The planning applications relating to both appeals were refused by Denbighshire County Council, contrary to the professional advice of its officers. The application relating to Appeal A was refused for two reasons. The first reason for refusal states that: "*It is the*

opinion of the LPA that the scale of the development would have an unacceptable impact on the character of the village and its infrastructure, in particular in relation to the highway network, as in combination with other committed and proposed developments on allocated sites, it would add to unacceptable levels of peak time congestion and dangers to all road users. This would have a negative impact on the well-being and quality of life of existing and proposed residents using the highway infrastructure...".

8. The second reason for refusal states that: *"It is the opinion of the LPA that the proposals do not adequately demonstrate that surface water run-off from the site and land above it can be managed without increasing the risk of additional discharge to watercourses leading to the Prestatyn Gutter, and hence increasing the risk of flooding downstream..."*. The linked planning application proposing the new road (Appeal B) was refused because it is the opinion of the LPA that the construction of a new road in open countryside, outside of the settlement boundary of Meliden, would be an unacceptable form of development, having an adverse visual impact, that cannot be justified in the absence of a permission for any residential development.
9. The land subject of the residential development proposed under Appeal A is located within the settlement boundaries identified within the adopted Local Development Plan (LDP) and is allocated for residential development. Despite some objections being raised by interested parties to the principle of residential development, the site's development plan status means that the principle of residential development in this location is well-established. There is also no doubt that the development would also make a significant and positive contribution towards the local housing supply. As such, and in the absence of any evidence to persuade me otherwise, I consider it appropriate to confine my reasoning to the principal matters of dispute arising from the reasons for refusal.

Main Issues

10. Having regard to the written and oral submissions, I consider the main issues in respect of the residential development proposed under Appeal A to be:
 - Whether the development would be acceptable in respect of its impact upon the highway network, having particular regard to the scale of development and the in-combination effects with other committed and proposed developments; and
 - Whether it has been satisfactorily demonstrated that the site could be drained without increasing the risk of flooding off-site.
11. The main issue in respect of the road scheme proposed in Appeal B is:
 - Whether the development would be acceptable in principle, having particular regard to its location outside of defined settlement boundaries, its visual impact and the findings in respect of Appeal A.

Reasons

Appeal A - Ref: APP/R6830/A/19/3243545 – Proposed Residential Development Highways Impacts

12. There is little doubt that the development of 133No. houses would result in an increase in traffic on the local highway network and I have no reason to dispute the Council and local residents' evidence that the highway network is subject to congestion during peak hours, particularly during the summer months when local traffic is supplemented by that associated with the tourism industry. Nevertheless, it is material to note that the site associated with Appeal A comprises a residential allocation in the adopted LDP and an increase in the amount of traffic on the road would clearly have been a consideration

when the Council made the decision to allocate the site for housing development. It is also material to note that the adopted LDP does not propose any strategic road improvements to deal with this issue.

13. No objections were raised by the Highways Authority prior to the determination of the planning application, subject to planning conditions being imposed. The Council's reason for refusal and its subsequent Statement of Case are non-specific, with little to indicate concerns over particular junctions or areas. Nevertheless, technical evidence was submitted by the LPA at the Written Statement of Evidence (WSoE) stage of the appeals process and, along with the evidence submitted at the Inquiry, it became clear that the concerns relate principally to the Ffordd Penrhwyfya/ A547 priority junction and, in particular, the right turn out of the minor road during peak times in the morning. Given that I have not seen any persuasive arguments to lead me to deviate from the Inspector's conclusion in the previous appeal that the local highway infrastructure could generally accommodate the increased traffic generated by the proposed development without harm to highway safety [Appeal Ref: APP/R6830/A/17/3174131], I shall concentrate on the most recent technical objections relating to the Ffordd Penrhwyfya/ A547 priority junction.
14. I visited the Ffordd Penrhwyfya/ A547 priority junction on numerous occasions on the 15 and 16 March 2022, including during the identified hours of peak congestion. Whilst I did not personally experience any delays, I accept that this finding may not be representative of typical experiences, with numerous representations from interested parties raising concern about the right hand turn on to the A547. Through the Inquiry, the Council identified a number of issues with the appellant's Transport Assessment and these shortcomings were accepted by the appellant. As such, much of the debate regarding the capacity of this junction centred on the evidence prepared by Mr Tilley on behalf of the Council. It is on this basis that I shall consider the impacts on this junction.
15. Mr Tilley's evidence indicates that, during the worst 15 minute window for congestion in the morning, the queue on the minor road would increase from an average of 6.5 cars without the development to 9.3 cars with the development in 2020, an increase of around 3 cars. In 2025 the corresponding figures are 11.1 and 15.6 respectively, equating to an increase in around 4 to 5 cars. The delays for vehicles at that same worst 15 minutes rises in 2025 by 50 seconds to reach a total of around 3.5 minutes. There was significant discussion at the Inquiry as to whether such changes would be perceptible to road users and there is no doubt in my mind that they would be for regular users of the junction.
16. Nevertheless, I have not seen any cogent evidence to lead me to conclude that the development would lead to an unacceptable form of congestion and neither have I seen anything to suggest that the delays associated with the appeal scheme would be materially worse than what would have been anticipated when the site was allocated for residential development. Indeed, the observations made at the time of my site visit were that the junction is not particularly unusual for such a built up area and the arguments that the proposed development would lead to unacceptable risk taking at the junction in question remain unsupported by robust evidence. It is also notable that the appellant has not previously been asked to provide mitigation at this junction and it is relevant to note that the evidence indicates that there are no records of any personal injury accidents within the vicinity of the junction.
17. I accept that the delays referred above may represent an inconvenience to some road users. However, the evidence suggests that such impacts would be modest and limited to relatively short periods of time. As such, I remain unconvinced by the Council's suggestion that such highway impacts would represent a material threat to highway

safety. I also remain unconvinced that such impacts would have an unacceptable negative impact on the well-being and quality of life of existing and proposed residents.

18. In coming to these conclusions, I have fully considered the in-combination effects associated with committed developments within the area, including those granted planning permission after the refusal of the application subject of this appeal. However, I have not seen anything to lead me to deviate from my overall conclusion that the highway impacts would be acceptable. I therefore find that there would be no conflict with the relevant provisions of Policy RD1 of the adopted LDP, or the SPG document entitled Site Development Brief: *'Residential Development at Ffordd Hendre and Maes Meurig'*. For the same reasons, I also find that there would be no conflict with the thrust of the advice set out in national planning policy.

Surface Water Drainage/ Flood Risk

19. Given the date of the original application, the appeal proposal is not subject to the requirements of Schedule 3 of the Flood and Water Management Act which makes the provision of Sustainable Drainage Systems (SuDS) mandatory. Moreover, the development proposal would not be the subject of the legislative requirement to obtain SuDS approval from the local authority in its SuDS Approval Body (SAB) role. The issue of site drainage is therefore a planning matter that needs to be addressed in principle at the planning stage, albeit with the potential for detailed technical matters to be addressed through the use of a suitably worded planning condition(s).
20. As set out above, the Council refused planning permission on the basis that it considers that the proposals do not adequately demonstrate that surface water run-off from the site, and the land above it, can be managed without increasing the risk of additional discharge to watercourses leading to the Prestatyn Gutter, thus increasing the risk of flooding downstream. This issue needs to be considered within the context of national planning policy, including that set out in Planning Policy Wales (Edition 11, 2021) and Technical Advice Note 15: *Development and Flood Risk* (2004) (TAN15). The Welsh Government (WG) has published a draft revision to TAN15. However, it is not due to come into effect until 2023 and, in any event, the thrust of the advice in that document in respect of site drainage remains largely unchanged. Indeed, the thrust of the advice is for development proposals not to increase the risk of flooding elsewhere, irrespective of the zone of flood risk within which it is located, and for a precautionary approach to be adopted where developments could increase the risk of flooding in vulnerable areas.
21. The appeal site is located in Flood Zone A and partially within Flood Zone B of the Development Advice Maps accompanying TAN15 (2004). Both WG and NRW have however since confirmed that the Development Advice Maps supporting the extant TAN15 are out of date. It has also clarified that the more recent Flood Map for Planning accompanying the draft revised TAN15 constitutes the best available spatial information in respect of flood risk and that it may represent a material consideration in planning decisions [WG Letter, dated 15 December 2021, Ref: MA-JJ-3967-21]. The appeal site is located within Zone 1 of the Flood Maps for Planning. However, it is important to note that a number of residential properties located a short distance downstream of the Prestatyn Gutter, including those at the nearby Pwll Y Bont that were subject of a flooding event in 2021, are located in Zone 3 of the Flood Maps for Planning which is classified as high risk. The vulnerability of this area to a flooding event was contextualised at the time of my site visit when I was able to observe both the proximity of the watercourse to the existing dwellings and the prevailing topography of the area.
22. The appellant contends that a viable drainage strategy has been proposed that would satisfactorily drain the site of surface water without increasing the risk of flooding off-site.

Specifically, a scheme of SuDS drainage is being proposed, with the intention for surface water to drain from the site at no more than greenfield rates, accepting however, that detailed design issues would need to be resolved through the use of planning conditions. In this respect, it is notable that no objections were raised by the drainage authority or NRW prior to the determination of the planning application and it is also notable that the LPA's own evidence indicates that, subject to suitable design, it is likely that a surface water drainage scheme can be provided for the development site. It is on this basis that the appellant contends that the Council is putting extensive burdens on the appellant at the planning stage when such matters could be adequately addressed through the use of planning conditions.

23. I have sympathy with the appellant's position, not least because the detailed objections to the proposal on such grounds were not articulated in any detail until late in the appeals procedure. Indeed, it was not until the WSoE stage that the detailed concerns were raised. Whilst the appellant has had the opportunity to respond to the evidence in the form of a Rebuttal to the LPA's WSOE, the Council raises concerns regarding overland flows and, in particular, flows received from higher land surrounding the appeal site and there remains a lack of an agreement over a solution. I shall consider these concerns in some detail, concluding whether they are justified and, if so, whether they could be adequately addressed through the use of planning conditions and/ or other statutory procedures.
24. The evidence indicates that, at present, water runs across the appeal site and finds its way through a series of informally dug drainage ditches on the adjacent land before ending up in the Prestatyn Gutter. Whilst flows would continue to be comparable to the existing situation post development, the Council is concerned that the velocities of such flows would increase post development, not least because some, albeit limited, infiltration currently occurs. The Council is also concerned that such flows would enter the adjacent land, travel across the aforementioned informally dug drainage ditches before eventually reaching the Prestatyn Gutter, thus increasing the potential for off-site flooding downstream. Nevertheless, the evidence suggests that surface water from the site could be attenuated and, given that the proposal is for such flows to be controlled to less than greenfield rates, I am satisfied that this particular element of the scheme could be further developed through the use of conditions to prevent an increase of flood risk off-site.
25. However, even if such flows could be adequately controlled through technical details to be approved through a planning condition, it is clearly relevant to note that the appeal site is a receptor of overland flows from higher land. The submitted plans illustrate that a cut-off drain could be provided upon the southern boundary of the site to intercept water from higher land to the south. The historical evidence suggests that such a cut-off drain is necessary and this is a position that is supported by Waterco, representing the LPA. The appellant currently states that a cut-off drain may not be necessary, contending that overland flows into the site from higher land to the south appear to be concentrated in the eastern boundary and that the flow path along the eastern boundary aligns with the existing ditch and would remain as existing.
26. Nevertheless, the appellant's position in respect of this matter appears to be unsubstantiated by a cogent assessment or modelling exercise and the appellant's drainage witness confirmed under cross examination that such flows could theoretically flow on to the appeal site if the ground was saturated. Whilst such flows could potentially be managed through the proposed drainage system, I am unable to confirm capacity for this in light of the available modelling. Notwithstanding this, even if a cut-off drain was to be provided, there is little to confirm that its outfall could be released at a greenfield rate at the point it reaches the Prestatyn Gutter. Indeed, whilst the evidence indicates that a

design solution may be feasible, it would need to be informed by further modelling and, given that the necessary modelling should influence design, I have concerns that such matters should be left to a planning condition.

27. Regardless of such concerns, a solution in respect of the onward connection of outfall remains lacking. In particular, the evidence indicates that the onward connection is outside of the control of the appellant and infilled in places meaning that water would flow over land. Whilst I have not seen any evidence to confirm that the infilling of the watercourse comprising the onward connection has been undertaken lawfully, I have also not seen anything to indicate that a solution is forthcoming. I recognise the fact that the Local Lead Flood Authority have permissive powers to serve notice on the riparian owner. However, the evidence does not appear to indicate that it is likely to exercise such powers. I appreciate the frustrations caused by the fact that such issues were raised late in the process. However, it remains wholly unacceptable for a scheme to discharge into an off-site watercourse knowing that it would eventually flow over land. Furthermore, without an indication that such issues can be resolved, with discharge rates controlled to at least greenfield rates, I do not consider that a planning condition could be utilised to progress the scheme.
28. The evidence clearly sets out the sensitivity of the Prestatyn Gutter to changes in flow rate or velocity and there are clearly potential implications for residential areas downstream. This is reflective of the fact that a number of the properties located at Pwll Y Bont are categorised as within Flood Zone 3 by the most up to date Flood Map for Planning. I have already mentioned the relatively recent flood event at this location and I was able to appreciate the particular sensitivities of this area at the time of my site inspection. It is also relevant to note that concerns regarding localised flooding events have also been a consistent theme of the written representations submitted by local residents. As such, I consider that the precautionary principle advocated by national policy should be applied in this instance. It is not, therefore, sufficient in my view to attribute substantial weight to the Council's concession that it is '*likely*' that a surface water drainage scheme could be provided for the development site without increasing the risk of flooding off-site. The fact that NRW did not object to the planning application is also not a weighty consideration, not least because its representation clarifies that surface water drainage does not fall within its remit.
29. Based on the foregoing, I find that a reliance on planning conditions to resolve the outstanding drainage matters would run counter to the thrust of the advice contained within WG's Circular 016/2014: *The Use of Planning Conditions for Development Management* (October 2014). Indeed, I find that it has not been satisfactorily demonstrated that the proposed drainage strategy could be implemented without increasing the risk of flooding off-site. The development therefore conflicts with the aims of Policy RD1 of the adopted LDP, the Site Development Brief: '*Residential Development at Ffordd Hendre and Maes Meurig*' and national policy set out in PPW and TAN15.

Conclusion on Appeal A

30. Whilst I have found that the development would not have any unacceptable impacts on peak time congestion or highway safety within the area, I have found that it has not been satisfactorily demonstrated that the proposed drainage strategy could be implemented without increasing the risk of flooding off-site. For the reasons set out above, such matters could not be reasonably dealt with through the use of planning conditions and neither are they outweighed by the matters in favour of the development, including the status of the site as a residential allocation and the positive contribution that it would make to the local housing supply. Indeed, the potential for increasing flood risk conflicts

with a fundamental principle of national planning policy and therefore represents a compelling reason why planning permission should be withheld in this instance.

Appeal B - Ref: APP/R6830/A/19/3243547- Proposed Road Scheme

31. Appeal B seeks planning permission to construct a new road of an approximate length of 400 metres to provide access to the residential site proposed under Appeal A. The road would meander from Ffordd Talargoch (A547), to the west of the existing properties along Ffordd Ty Newydd, and would enter the site of Appeal A at its south- western corner. The road would be elevated in most parts, although it would be the subject of a scheme of landscaping. The Council objects to the construction of the new road on the basis that it would be an unacceptable form of development that would have an adverse visual impact, contending that such harms cannot be justified in the absence of a permission for the residential aspect proposed under Appeal A.
32. I was able to observe at the time of my site visit that the highway scheme would be visible from both the garden areas and the rear rooms of a number of the existing residential properties located along Ffordd Ty Newydd. Indeed, a number of these properties occupy open views over the fields to the west. However, whilst the magnitude of change from these sensitive receptors would be significant, there is no right to a view over land in third party ownership and I have not seen anything to suggest that the development would result in a material loss of outlook that would cause material harm to the living conditions of the occupiers of those properties.
33. The proposed road would be clearly visible from nearby public rights of way and from the A547 Ffordd Talargoch. However, whilst it would clearly represent an urbanising feature, I consider it to be relevant to note that, from such vantage points, the development would generally be seen within the context of the existing built form and, in particular, against the existing rear boundaries of the properties along Ffordd Ty Newydd that represent a prominent and hard edge to the settlement. The visual harm from such vantage points could also be mitigated to a certain degree through the implementation of a landscaping scheme that could be designed to soften the edge to the existing built form.
34. Nevertheless, it cannot be ignored that the new road would be located outside of the settlement boundaries of Meliden and would therefore be located within the countryside for the purposes of planning policy. Both the adopted LDP and PPW advocate strict control of development in such locations. The development would clearly represent an incursion into what is an agricultural field and would represent a prominent urbanising feature when viewed from the visually sensitive summit at Graig Fawr. The impacts from this vantage point could not be mitigated through a scheme of landscaping. As such, without the necessary planning permission associated with Appeal A, I concur with the Council's assessment that the development would represent an unjustified form of development. It would therefore be unacceptable in principle and in conflict with the aims of both Policy ASA1 of the adopted LDP and the thrust of national policy.
35. I have fully considered the fact that the submitted Unilateral Undertaking would prevent the road from being developed without a planning permission for residential development. However, whilst the Unilateral Undertaking defines residential development as a scheme pursuant to that granted under LPA Ref: 43/2018/0750 "*...or such other detailed planning permission as may be granted for the residential development of the same land*", given the ambiguity regarding any alternative residential scheme, I consider that it would be inappropriate to grant planning permission for Appeal B in this instance.

Overall Conclusions

36. Based on the foregoing, and having considered all matters raised, I conclude that both Appeal A and Appeal B should be dismissed. In coming to these conclusions, I have considered the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (WBFG Act). I have taken into account the ways of working set out at section 5 of the WBFG Act and consider that the decisions are in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives, as required by section 8 of the WBFG Act.

Richard E. Jenkins

INSPECTOR

Annex A - APPEARANCES

FOR THE APPELLANT:

David Manly QC

Instructed by Matt Gilbert, Planning Consultant

He called:

Matt Gilbert

Planning Consultant

D. Roberts

Highways Witness

N. Owen

Flood Risk/ Drainage Witness

J. Barr

Landscape Witness

FOR THE LOCAL PLANNING AUTHORITY:

Stephanie Hall (Barrister) of Counsel

Instructed by Tim Dillon, Solicitor, Denbighshire County Council

She called:

Mr Phillip Garner DipPS MSc MRTPI

Planning Consultant

Mr Aaron Tilley HNC CMLIT CHIHT

Highways Witness

Mr Mike Wellington BEng (Hons) MSc CEng
CEnv FICE FCIWEM C.Wem ImaPS MAPM

Flood Risk/ Drainage Witness

Mr Neil Furber BSc Dip LA CMLI

Landscape Witness

Mr Tim Dillon

LPA Solicitor

Mr James Curran

LPA, Education Dept.

INTERESTED PARTIES:

Councillor Evans - County Councillor

Christopher Thomas

Mr Paterson

Ann Wilkinson

Marion Hunt

Glenys Lloyd Wallace

Jean Hague

Carol Evans

Annex B - DOCUMENTS SUBMITTED AT THE INQUIRY

1. Appellant – Opening Statement
2. LPA – Opening Statement
3. Appellant – Application for an Award of Costs
4. Appellant – Land Ownership Letter of Clarification
5. LPA – Waterco suggested Drainage Planning Conditions (Version 1)
6. LPA – Planning Contributions – Justification
7. LPA – Planning Obligations Supplementary Planning Guidance (SPG)
8. Appellant – LVIA Guidance Clarification, Julie Barr
9. LPA – Suggested Drainage Planning Conditions with appellant comments (Version 2)
10. Appellant – Suggested Drainage Planning Condition
11. Appellant – Planning Obligation/ Unilateral Undertaking (Appeal B)
12. Appellant – Planning Obligation (Appeal A)
13. Appellant – Education Contribution Position Statement
14. LPA & Appellant - Suggested Site Visit Arrangements
15. Cllr Evans – Written Statement
16. LPA – Costs Rebuttal
17. Appellant – Costs Final Comments
18. LPA – Reasons for Suggested Conditions
19. LPA – Closing Submissions
20. Appellant – Closing Submissions