

# Report

**3**

Report to:	<b>Planning Committee</b>
Date of Meeting:	<b>12 April 2005</b>
Report by:	<b>Executive Director (Enterprise Resources)</b>

Application No	CL/04/0444
Planning Proposal:	Reclamation of Failed Forestry Area Utilising Imported Soil Amendments in Preparation for Future Afforestation and Public Access and Nature Conservation Features at Byelawhill, Woodmuir South and Wester Mosshat OCCS by Forth

## 1 Summary Application Information

- Application Type : Mineral Application
- Applicant : Portcullis Developments
- Location : Heathland Plantation/Woodmuir  
Plantation and Wester Mosshat OCCS, by Forth

## 2 Recommendation(s)

### 2.1 The Committee is asked to approve the following recommendation(s):-

- (1) Grant detailed planning permission (subject to conditions – based on conditions listed overleaf).

### 2.2 Other Actions/Notes

The Planning Committee has delegated powers to determine this application.

## 3 Other Information

- ◆ Applicant's Agent: Johnson Poole & Bloomer (Scotland) Ltd
- ◆ Council Area/Ward: 12 Forth
- ◆ Policy Reference(s): NPPG10 – Planning and Waste Management  
Planning Advice Notes: 50 Controlling the Environmental Effects of Surface Mineral Workings (Annex A + B); 63 Waste Management Planning  
Scottish Development Department Circular No: 24/1985 – Development in the Countryside and Green Belts  
  
Glasgow and Clyde Valley Structure Plan (2000)  
– Strategic Policy 9 “Assessment of Development Proposals”

Upper Clydesdale Local Plan (1996) Policy:

## 73 Remote Rural Area

South Lanarkshire Minerals Local Plan (Adopted 2002)

MP1: General Protection of the Environment  
MP5: Visual Intrusion and Landscape Impact  
MP7: Watercourses, Surface and Groundwater  
MP12: Impact on Communities  
MP19: Restoration and Aftercare Provision

◆ Representation(s):

▶ 3 Objection Letters

◆ Consultation(s):

Lanarkshire Health Board

Environmental Services

S.E.P.A. (West Region)

Scottish Executive Development Department

Health & Safety Executive

Director of Mining Projects & Property (Coal Authority)

Forestry Commission (Central Scotland Conservancy)

Glasgow & Clyde Valley Structure Plan Manager

Roads and Transportation Services (South Division)

Scottish Natural Heritage

Power Systems

TRANSCO (Plant Location)

Scottish Wildlife Trust

Scottish Water

West of Scotland Archaeology Service

West Lothian Council Planning Service

Scottish Executive Environment & Rural Affairs Dept. (SEERAD)

# **Planning Application Report**

## **1 The Application Site**

**1.1** The application area is situated within, and around the Woodmuir/Worm Law Plantation located North of Wilsontown. The total site area covers 154 hectares of land comprising 3 separate land areas. The 3 areas are:

- (i) Byelawhill – (total area 102 hectares with actual working area being 34 hectares). This land comprises an existing primarily conifer plantation located immediately to the east of the A706 Forth road and north of a cluster of residential properties at Pleasance Row.
- (ii) Woodmuir South – (total area 33 hectares with actual working area 6 hectares). This land comprises an existing conifer plantation located within Woodmuir Plantation and north east of the Byelawhill area.
- (iii) Wester Mosshat Area 4 (WMA4) – (total area 15 hectares with actual working area 15 hectares). This land comprises partially unrestored and unvegetated former opencast land located north of Burnfoot Farm on the south eastern edge of Worm Law Plantation.

**1.2** Access to the sites would be taken off the A706 Forth road on the Byelawhill site via an existing forestry access road (total area 4 hectares) that was formerly an opencast coal site haul road. This haul road continues through the proposed Byelawhill site eastwards via Woodmuir South to turn south to access the applicants existing Wester Mosshat working area. The access road would then be extended westwards, should planning approval be forthcoming for this development, to link into the WMA4 land area.

## **2 Proposal**

**2.1** It is intended to import soil amendments, including sewage sludge filter cake, canal dredgings and clean water sludges. It is intended to blend those imports with indigenous site material to improve the existing ground conditions, to form an enhanced soil medium suitable for future tree planting and early ground cover colonisation.

**2.2** The Byelawhill and Woodmuir South sites are generally defined by existing forest rides and fencelines. However, until tree clearance has taken place, the precise boundaries of the previous opencast coal activities cannot be defined. For this reason the planning boundaries for both Byelawhill and Woodmuir South are larger than what may ultimately be required for development.

**2.3** Initial site operations would involve the preparation of site perimeter ditches to contain surface water runoff and delineate the site areas. The ditches would feed into settlement lagoons that would be retained and reproduced at site restoration to create permanent water features.

**2.4** For Byelawhill and Woodmuir South sites, the existing stunted tree stands would be felled and cleared.

- 2.5** Imported material at the rate of 4,000 tonnes per hectare of semi-dried cake carried to site in sealed vehicles and temporarily deposited into a holding pit. Hours of operation will however be limited as set out by Environmental Services.
- 2.6** Trenches, to a depth of 1.5 metres, would be dug within the receiving areas with the excavated soils being mixed with the imported material before being replaced.
- 2.7** It is proposed that Scottish Agricultural College (SAC) would monitor the site operations.
- 2.8** Restoration would be at the rate of 1 hectare per week, following such a grass mix would be spread on the surface to promote an early soil cover; to assist in inhibiting surface water flows and to restrict weed growth.
- 2.9** Afteruse of the land areas is envisaged as providing a mixed forestry/amenity use.
- 2.10** The applicants envisage being allowed flexibility in the phasing of the sites to take account of obtaining felling licences; closeness to properties and winter weather where maintaining the long haul road during inappropriate weather would necessitate additional machinery being acquired.
- 2.11** The applicants originally proposed working with the following hours:
- Monday – Friday 7.00a.m. – 7.00p.m.  
Saturday and Sunday 7.00a.m. – 2.00p.m. (Byelawhill and Woodmuir South)
- Saturday and Sunday 8.00a.m. – 2.00p.m. (WMA4)
- 2.12** Traffic generation would be a maximum 60 vehicle movements a day (30 in / 30 out) with all vehicles accessing/egressing the site from the north.
- 2.13** An Environmental Impact Statement supports the application, which covered the following areas:
- (i) Odour – was recognised as being potentially the most environmentally sensitive issue with the sewage sludge being the principal perceived odour generator.
- Odour would be addressed, in line with the applicants existing practice at adjacent sites, through-pre-treatment of the sludge prior to importation.
- transport of sludge in sealed vehicles
  - deposition/cultivation with indigenous material on arrival at site
  - covering stockpiled material if adverse weather conditions prevented immediate deposition into the ground
  - provision of mechanical odour suppression equipment
  - provision of soil/peat covering over restored areas.
- (ii) Landscape/Visual – The report noted that the Byelawhill and Woodmuir South sites are screened by existing forestry areas. For WMA4 the report notes that the land was, previous to opencasting, poor quality agricultural land. The site is open to view from a number of surrounding properties, with non landowners being situated a minimum of 600 metres away. A poultry farm is located some

300 metres away although it is screened from the site by a reprofiled former bing.

The report considers that restoration would allow an opportunity for an enhanced restoration scheme and opportunity to extend the public footpath network.

- (iii) Noise – The report identified that for Byelawhill and Woodmuir South, the nearest properties, at Pleasance Row, would be 200 metres although due to screening effect of the forest, noise would not be considered an issue.

For WMA4, the site is recognised as being open although the proposed operations are considered comparable to those operations required, under the opencast coal permission, to achieve restoration to agriculture.

- (iv) Dust – The report identified that for Byelawhill and Woodmuir South, the nearest properties at Pleasance Row would be screened by the existing forestry and dust is not considered to give rise to an impact.

For WMA4, whilst having properties close by, the applicants existing operations have come closer to properties without giving rise to environmental concern.

The report notes that wheel washing facilities are already provided at the site entrance and the sealed nature of the vehicles mitigates against material contaminating the public highway.

- (v) Water – The report considers that groundwater is unlikely to be encountered.
- (vi) Ecology – The report states that potential areas of floral interest would be identified and safeguarded.
- (vii) Archaeology – The report states that no archaeological interest has been identified within the site boundary. Suitable standoffs would be provided to protect any archaeological interests lying in the vicinity of the site.

### **3 Background**

#### **3.1 Relevant Government Advice/Policy**

**3.1.1** National Planning Policy Guidance Note 10 “Planning and Waste Management” (NPPG10); Planning Advice Note 63 (PAN 63) “Waste Management Planning”; PAN 50 Controlling the Environmental Effects of Surface Mineral Workings (Annex A + B), are all applicable in this instance.

**3.1.2** NPPG10 sets out the policy advice against which applications of a waste management nature are to be assessed. It also states that land use planning has an important role to play in achieving sustainable waste management and the integration of both economic and environmental objectives.

**3.1.3** PAN 63 provides planning advice on the approach to dealing with waste management infrastructure proposals.

- 3.1.4** PAN 50 Annex A (noise) and B (dust) provides advice on setting appropriate noise levels and measures to address dust arising from site operations.

### **3.1 Local Plan Status**

- 3.2.1** The Glasgow and Clyde Valley Structure Plan (2000) Strategic Policy 9 (SP9) “Assessment of Development Proposals” is relevant. SP9 requires development proposals to be assessed for conforming to the Structure Plan against criteria of: site, size; appropriateness of location and that provision being made to address amongst other matters appropriate infrastructure to make the development acceptable.

- 3.2.2** The Upper Clydesdale Local Plan (1996) covers the application area and Policy 20 – Areas for Coal Extraction applies. Part of the application site is within an area identified as preferred for opencast coal extraction.

- 3.2.3** There is no local waste policy guidance against which this application can be specifically assessed. In these circumstances therefore, it is appropriate to consider as a material consideration the policy guidance contained within the South Lanarkshire Minerals Local Plan as it relates in general to this application type.

- 3.2.4** The South Lanarkshire Minerals Local Plan was adopted in September 2002 and contains the following policies against which the proposal should be assessed:

- Minerals Policy 1 (MP1) “General Protection of the Environment” provides that minerals applications be considered against their potential impact on the environment and local community and that permission will not be granted where mineral proposals have a potential visual/landscape impact.
- Minerals Policy 5 (MP5) “Visual Intrusion and Landscape Impact” provides that there will be a presumption against development that is visually intrusive or has an adverse local landscape impact.
- Minerals Policy 7 (MP7) “Watercourses, Surface and Groundwater” provides that mineral development will only be permitted where development would not alter surface water flows or adversely affect natural habitats or increase the potential for flooding.
- Minerals Policy 12 (MP12) “Impact on Communities” stipulates that the Council seeks to minimise the impact of mineral development on the environment of local communities by permitting extraction only where;
  - the local road network can accommodate traffic generated and is to the required standard.
  - environmental issues of noise, dust and visual impact would be acceptable or could be mitigated.
- Minerals Policy 19 (MP19) “Restoration and After-care Provision” requires appropriate restoration and aftercare provisions to be made for the site.

In addition to the above, it should be noted that the Glasgow and Clyde Valley Area Waste Plan (2003) has been prepared by SEPA, in partnership with the 8 local authorities and Local Enterprise Companies. This provides a framework for the strategic planning of waste management facilities. Its key aim is to develop waste management systems to control waste generation, reduce its environmental impacts, improve resource efficiency and maximise the economic opportunities arising from waste.

### **3.4 Planning Background**

**3.4.1** Parts of Byelawhill and Woodmuir South were previously subject to opencast coal operations undertaken prior to the 1980's and since restoration the land has been incorporated into a commercial conifer plantation.

**3.4.2** The land parcel, at WMA4, formed part of a larger opencast coal permission area, known as Wester Mosshat (CL/98/0153) and was the last of three opencast coal planning permissions incorporating this application site and adjacent land to the immediate north and east of the present application area subject of this report (Planning Ref Nos: P/LK/01950427 AND CL/01/0423). This third opencast coal site was worked during the 1990's, although restoration to overburden level was only partially achieved by the applicant company, Law Mining Ltd.

**3.4.3** Subsequently, two planning permissions were granted in 2001 (CL/01/0423) and 2002 (CL/02/0595) to Portcullis Developments Ltd, (the same applicants subject of this report) for the reclamation of former opencast coal sites by contouring and cultivating (including the importation of soil amendments such as sewage sludge cake). The 2001 site has been completed and tree planting is being undertaken. The 2002 site is expected to be completed by the end of March 2005.

**3.4.4** Discussions have taken place between Law Mining Ltd, the applicants and representatives of the Council to consider ways forward to achieve early restoration and landscaping of the former mining site area covered by WMA4. Under the opencast coal permission, this area of land was to have been reinstated to grass land. The applicants have proposed to incorporate this land into their adjacent operations and reinstate the land to accommodate forestry and public access.

## **4.0 Consultations**

### **4.1 Environmental Health Services**

Initially raised concerns about pollution and nuisance aspects. In particular:

Pollution:-

- (i) Limits should be imposed to address concentration levels, as set out in the Sludge (Use in Agriculture) Regulations 1989, or for substances not covered by the Regulations then concentrations as set out in the Soil Guideline Values issued by Department of Environment, Fisheries and Rural Affairs.
- (ii) Need to monitor watercourses up, mid and down stream of the application area for E-coli.
- (iii) Need for effective and safe odour control scheme.

Nuisance:

Limit on hours of operation and vehicle movements:

8.00a.m. – 7.00p.m. Monday to Friday

8.00a.m. – 1.00p.m. Saturdays

Need for an odour monitoring/management scheme.

More recently, Environmental Health have advised that following negotiations, issues have been resolved and agreed. In addition to the above, they are seeking conditions, relating to the following matters, to be attached to any consent granted:

- tonnage's limited to 3,500 tonnes/hectare over 15 hectares
- sampling of sewage sludge (canal dredgings)
- monitoring of surface waters
- audible noise to be controlled
- controls over odour nuisance

Response: The applicants in responding to these matters draw attention to their existing adjacent operations whereby monthly reports are produced to address concentration levels as set out in the above Regulations.

Further applicants exemption licence is only issued following SEPA being satisfied about the environmental aspects of their operations.

The applicants note the comments about E-coli and would put in place appropriate monitoring via their consultants SAC, and do not consider that pathogen transfer through the soil/ground works would occur. The use of ground cover/vegetated buffer zones and no application zones would limit the potential for pathogen runoff.

The applicants would undertake watercourse monitoring as requested by EHO, and confirms that the odour suppression equipment is a standard type, used in industry as well as on other sites, which has proved environmentally and personnel safe.

In terms of nuisance, the applicants confirm that the restriction on the hours of operation are acceptable except Sundays, when the receipt of sewage sludge may need to be accommodated occasionally as well as the need to do site maintenance.

In respect of odour monitoring, it would be the applicants intention to continue the monitoring arrangements as used at their other adjacent sites. Monitoring and recording of weather conditions is the responsibility of a site representative to undertake.

The applicants confirm that in the event that odour becomes a problem then they would relocate site operations to another part of the site and atomisers would be used. This flexibility of movement allows the applicants to satisfy SEPA concerns over noise and odour nuisance.

In respect of preventing site material being taken off site, vehicle rears would be washed and the provision of wheelwash/vehicle undersides would be provided.



The above points will be addressed later in my report. Most aspects would, if planning approval were forthcoming be addressed through conditions being imposed.

#### **4.2 Roads and Transportation**

No objection subject to an appropriate Section 96 Agreement being secured to address proposed site traffic flows.

Response: On the basis that the proposed site generated traffic flows would be an overall reduction in traffic numbers compared to those generated by the applicant company's existing adjacent operations, Roads and Transportation Services have subsequently confirmed that there is no need for a Section 96 Agreement.

#### **4.3 The Coal Authority**

No objection but draws attention to the potential for leachates in the sludge entering through old mine workings underground waters which the Coal Authority may be having to treat through their minewater treatment programme.

Response: Noted. The issue of leachates is addressed later in this report.

#### **4.4 Forestry Commission**

No objections.

Response: Noted.

#### **4.5 Glasgow and Clyde Valley Structure Plan Manager**

No objection. Noted that the application conforms to policy advice as set out in the Glasgow and Clyde Valley Structure Plan in that the development would promote an improvement to the environment and the Central Scotland Rural Investment Area.

Response: Noted.

#### **4.6 Historic Scotland**

No comment.

Response: Noted.

#### **4.7 Health and Safety Executive**

No comment as the development does not meet the criteria for types of proposal upon which it provides consultation responses.

Response: Noted.

#### **4.8 Scottish Power (Power Systems)**

Noted that there are utilities in the area and the applicants is advised to discuss its development intentions to ensure utilities are safeguarded.

Response: Noted, should planning approval be forthcoming then the advice of Scottish Power would be forwarded to the applicants.

#### **4.9 Scottish Executive Development Department (SEDD)**

Air Climate and Engineering Division – No comment, although attention is drawn to the introduction of the Water Environment (Controlled Activities) Regulations where controls on impacts to the water environment will be introduced.

Response: Noted, should planning approval be forthcoming then the advice of SEDD would be forwarded to the applicants.

Trunk Road Network Management Division – No comment.

Response: Noted.

#### **4.10 Scottish Environmental Protection Agency (SEPA)**

Originally concerned that the information submitted, was generic and lacked site specific information relating to soil permeability and quality, topography and land drainage. SEPA were therefore unable to determine the environment risk posed. SEPA also sought specific information from the applicants on:

- Waste Types
- Waste Quantities and
- Groundwater

Response: SEPA's comments have been forwarded to the applicants and a revised report has now been sent direct to SEPA detailing the proposed operations at WMA4. SEPA have now confirmed that following the applicants recent submission of a draft water exemption registration, that they would confirm that the risk of the ground water regime from the proposed activity, is low, SEPA requires further risk information from the applicant in support of the waste exemption document. Issues in relation to sampling of the waste streams and monitoring of the application of the waste, can be covered via the exemption process.

In respect of the WMA4 revised report, the applicants have confirmed that they employ SAC to undertake an initial assessment of the lands requirements; to monitor site operations and determine import/spreading rates and to monitor soils post restoration for 3 years.

- That watercourse monitoring would take place prior to, during and post restoration with independent testing assessment of the companys own testing being undertaken.
- Site surface water would be contained.
- Background noise levels would, if required, be undertaken together with monitoring during site operations.
- Provision of an odour control management system of requiral.

Whilst SEPA's concerns are primarily issues relating to their own regulatory functions, there are matters which also have a valid planning bearing. I shall address these later in my report.

#### **4.11 Scottish Executive Environment and Rural Affairs Department**

No response received to date.

#### **4.12 South Lanarkshire Health Board (NHS Lanarkshire)**

Seek assurance to offset the concern raised over the use of sewage sludge to regrade derelict land. In particular the provision of information is sought about similar activities where proximity to populated areas and potential for odour is concerned.

Response: The applicants have been made aware of these concerns and the subsequent correspondence, together with that of the EHO and SEPA has been forwarded to the Health Board.

#### **4.13 Scottish Natural Heritage**

No objection but recommends the following conditions to safeguard their interests:

- Adherence to the application details unless otherwise agreed by SNH.
- Prior to the granting of any consent an extended Phase 1 Habitat Survey of the grassland areas be undertaken.
- Provision of a 30 metre buffer zone between areas to be treated and watercourses/associated wetlands.
- Protection of micro-habitats dominated by Club Moss.
- To implement best forestry practice.

Response: Appropriate conditions would be imposed to address SNH's concerns. In respect of the Phase 1 Habitat Survey, such a survey requires to be undertaken during the appropriate season. I would, should planning approval be forthcoming, recommend a suspensive condition be attached to allow for such a survey to be undertaken prior to development commencing in the areas of interest.

#### **4.14 Scottish Water**

Require that they be approached should any of their utilities be discovered within the site.

Response: Should planning approval be forthcoming then the applicants will be notified of Scottish Water's requirements.

#### **4.15 Transco**

No response received to date.

#### **4.16 Scottish Wildlife Trust (SWT)**

Supports the application through its potential to enhance nature conservation and afforestation interests together with the beneficial use of a waste product.

SWT would wish to have assurance:

- (i) On the source of the material to be imported given the recent public concerns over similar schemes to import sewage sludges.
- (ii) Effects on protected species.

Response: The applicants have been put in contact with SWT to discuss the issues raised. I await confirmation from SWT that their concerns have been addressed. However, SWT are not objecting to the proposals but seeking reassurances.

#### **4.17 West Lothian Council**

No objection subject to site access being within South Lanarkshire and not West Lothian.

Response: Noted.

#### **4.18 West of Scotland Archaeology Service**

Notes that previous opencast coal operations would have removed any potential archaeological interest.

Response: Noted.

### **5 Representations**

**5.1** As a consequence of both neighbour notification and press advertising under Article 12(5) (Scale or Nature of Operation) and Regulation 13 of the Environmental Impact Assessment (Scotland) Regulation 1999, three letters of representation objecting to the application have been received. These comprise:

- (i) One signed letter petitioning, on behalf of the signatory and 20 other residents (unidentified) of part of Wilsontown, objecting to the following:
  - General dumping of sewage sludge
  - Transport of sludge through Forth with seepage and odour omissions
  - Odour from the Wilsontown Colliery Site would affect Wilsontown residents
  - Questions need for fertilising when natural regeneration of trees on site has already taken place.

Response: These matters are addressed further on in this report although it should be noted that the Wilsontown Colliery Site is an active opencast coal site and no sewage sludge importation is proposed here.

- (ii) Unsigned letter, from The Residents of Pleasance Row and Surrounding Areas, with attached unsigned typed list of 38 local names and addresses. This letter sets out objections to:
  - Tipping of waste.
  - Local community is already surrounded by other mineral/waste sites and 3 telephone masts.
  - These existing developments have increased heavy traffic use on the A706.

Response: These matters where appropriate are addressed further on in this report.

- (iii) A further single letter from a resident has been received raising similar issues to those outlined above.

These letters have been copied and are available for inspection in the usual manner.

## **6 Assessment and Conclusions**

This proposal relates to the importation of soil amendments to enhance the reclamation of failed forestry planting. To seek land reclamation through importation of material, is ultimately one of disposal of waste to land. As such, it requires to be considered in light of the principal objective of sustainable waste management. In addition, the proposals need to be assessed against national guidance and local plan, impact on the environment and road safety.

In terms of national guidance, achieving sustainable development is set against a national waste management framework hierarchy of options:

- reduction of waste
- reuse
- recover
- environmentally sensitive disposal

The sustainability framework sets the objective, for planning authorities, to take the Best Practicable Environmental Options (BPEO) in relation to the handling of particular waste streams. The BPEO is defined as the option providing the most benefit/least damage to the environment at acceptable cost over both the short and long term.

In determining BPEO, decision makers are expected to take account of, the following key considerations, namely:

- the proximity principle – requiring waste to be disposed of as close as possible to its place of production.
- precautionary principle – requiring planning authorities to consider, where there remain concerns over a potentially environmentally damaging development, should it be refused or be subject to conditions.
- Best Practicable Environmental Option (BPEO) – in respect of dealing with a particular waste stream but providing most benefit and least damage to the environment. (NPPG 10 notes that BPEO would normally be addressed more fully by SEPA in their regulatory pollution consent note.)

- 6.1** In addition to the above, NPPG 10 notes that with the ban on dumping of sludges at sea, spreading on land/incineration will be the only available option. Furthermore, NPPG 10 advises planning authorities to have regard, through the development plan to the potential implication of using sewage sludges. There is no specific planning guidance as to the handling of this particular waste stream. Recent legal decisions concerning sewage sludge incineration, in Scotland, has left this particular disposal avenue in question. It would appear that for the foreseeable future, sewage sludge disposal to land is going to be the industry's favoured, and possibly only, option.

Notwithstanding this, sewage sludge disposal to land is generally seen, in principle, as a sustainable operation. Its benefits are seen as introducing a soil medium enhancer to achieve final afteruse. In the case of this application the afteruse is forestry and the Forestry Commission, the principal landowners, recognise sewage sludge as an acceptable promoter to forestry regeneration.

Whilst proposals of this nature are clearly not contrary to national priority guidance, SEPA will ultimately determine, and control, whether the application is of a waste disposal nature. However, such proposals need to be assessed in detail, against detailed local plan policy in order to consider any environmental impacts.

In this regards whilst policies contained within the South Lanarkshire Minerals Local Plan, are not specific to waste disposal, some cover environmental issues.

Taking account of both national guidance and South Lanarkshire Council Mineral Plan, the principle issues relating to this development are:

- Acceptable use of the land.
- The appropriateness of the development in this location.
- The effects of the development on local communities and land uses, in this case through –
  - (i) Visual and Landscape impact.
  - (ii) Noise/dust generation and odour.
  - (iii) Traffic.
  - (iv) Ecology.
  - (v) Water environment.
  - (vi) Health/contaminants.

(a) Acceptable use of the land

The use of sewage sludge on land is an emotive subject nationally. With the ban on sea dumping, sewage sludge outlets are limited to land disposal or incineration.

(b) Appropriateness of the development in this location.

NPPG 10 whilst recognising the potential benefits of sewage sludge use on forestry land advises planning authorities to consider the use that land may be put to i.e. public access, watercourses and so on.

Of the three land areas, that make up this application, two are within existing plantation areas. The third, WMA4, is an area proposed for incorporation into a forestry afteruse. The Forestry Commission has not objected to the overall scheme which would be further developed following planting to incorporate public access and nature conservation features as part of their wider forestry design programme. The applicant company has undertaken activities of a similar nature on adjacent land which has now been proposed for forestry and is being tree-planted. Public access routes/wetland creation features are being incorporated into these schemes.

In terms of locational acceptability, with respect to the proximity principle, the sourcing of sewage sludge arises from various sewage treatment works within Scotland. However sludges are generated at various locations within the United Kingdom. The determinant as to their final disposal location is likely only to be restricted by availability of sites and economic haul distance.

From a planning point of view, the source of the sludge is not particularly relevant; more the impact arising from traffic generation. Traffic implications are addressed further below.

A question that arises is whether the land can be reclaimed, and made suitable for its proposed afteruse, without the need for importation of the material proposed. An objector has also questioned the need for introducing a fertiliser when natural regeneration has already occurred on the site.

The applicants have stated that the nature of the problem, stunted tree growth, has been identified by the Forestry Commission as land suitable for treating with sewage sludges.

Appropriate assessment of the problem, including core sampling and trail trenches could identify the exact problem. The usual method of alleviating compaction would be the use of heavy machinery to rip the ground and introduce land drainage.

Whilst this procedure may partially address the problem, there would still be the need to introduce appropriate nutrients. The Forestry Commission has identified the sewage sludge as being the most appropriate medium for introducing slow release nutrients as well as acting as a soil enhance appropriate for forestry regeneration.

Use of any alternative materials would however also necessitate a similar generator of traffic. Specific issues such as this are addressed further below.

In terms of the waste hierarchy, the disposal of sludge to land, such as forestry, can be considered a sustainable land use, through its reuse with the potential of enhancing restoration and creating a nutrient rich growing medium.

(i) Visual and Landscape impact

The Byelawhill and Woodmuir South areas are within and screened by the existing plantation. Any development proposals, involving the tree felling and land cultivation, would be undertaken behind a retained tree screen.

The WMA4 is open to view, however the land remains unrestored and has a derelict appearance. Undertaking reinstatement of the land, together with sludge importation would not present an unacceptable visual impact, over and above what would be required to restore the land in accordance with the approved restoration scheme required under the mineral permission.

Overall, the degree of disturbance proposed would not create an unacceptable land or visual impact.

(ii) Noise, dust and odour

From experience of the applicants adjacent operations, noise and dust generation has not been a significant feature of these operations.

The principal noise generators would likely be for Byelawhill and Woodmuir South, the tree felling, an activity that would be associated with normal forestry activities. For WMA4 the soil resspreading/cultivating which would be necessary as part of the approved restoration proposals under the mineral permission.

Odour, is a feature of this type of development to which the applicants have outlined measures to minimise its potential. The Planning Authority has received occasional complaints from local residents about odour arising in the area.

Notwithstanding the proposed odour mitigation measures, standoffs and a phasing programme have been discussed with the applicants. These revisions would include pulling back proposed site operations from the south west corner of the Byelawhill area to increase distance from Pleasance Row and to retain a wider treebelt screen.

A phasing programme would be instigated to ensure only one operational area is active at any one time in the sequence WMA4, Byelawhill and Woodmuir South.

Site operations within Byelawhill would be phased such that reclamation operations would work away from sensitive properties.

I would also recommend, should planning approval be forthcoming, that appropriate conditions be imposed to safeguard public amenities including a stringent odour management/monitoring scheme.

#### (iii) Traffic

The application site is adjacent to the A706 and, if approved, would seek a continuation of the similar traffic movements associated with the applicant company's existing adjacent operations. Given this, I do not consider that the traffic generation is likely to be unacceptable.

There has been previous local concern, principally from residents in Forth, that sludge carrying traffic were traveling through this village. The applicants have stated that they may direct their vehicles to access/egress their Wester Mosshat site operations from the north i.e. A71/A706 to avoid Forth area.

Whilst traffic movements may occasionally take place through Forth, there would not be frequent enough, to warrant a Section 96 Roads Agreement to restrict traffic routing.

The applicants have confirmed that traffic numbers would actually result in a decrease in movements from those already entering the sites and therefore Roads and Transportation Service has not objected to the application or required a Section 96 on this basis.

#### (iv) Ecology

The applicants have met with representatives from SNH on site and agreed that areas of floral interest, within the Byelawhill and Woodmuir South areas, would be surveyed and safeguarded.

There are no protected species affected by the application proposals.

Appropriate conditions would be imposed to address any natural conservation interests within the application area should planning approval be forthcoming.

#### (v) Water Environment

There are watercourses adjacent to the Byelawhill and Woodmuir South site areas and an appropriate site parameter standoff would be proposed to act as a buffer zone where no deposition of sludges would be permitted. Likewise, site parameter ditches would be provided to contain surface water runoff before entry to any watercourses.



The applicants have agreed to monitoring of adjacent watercourses to safeguard against pollution and to continue this monitoring post restoration.

Subject to appropriate conditions being imposed to address monitoring/mitigation measures, I would raise no objection on planning grounds to potential effects on the water environment. SEPA, under their own legislation, would address further the protection of ground water.

(vi) Health and Contaminants

There is a recognised potential for pathogens and contaminants, in the form of heavy metals, to be introduced on site through the spreading of sewage sludges and canal dredgings respectively.

Both the EHO and SEPA, are responsible for public health and environmental safeguarding and will address these matters more fully. Likewise, the Forestry Commission, on whose land it would be spread and who are promoting future public access, would themselves need to be satisfied over the safety implications of the development proposal.

The applicants have confirmed that through independent research/monitoring, pathogen breakdown occurs within a short period after spreading and that public health risks are unfounded.

NHS Lanarkshire, although seeking assurance about similar such operations in relation to populated areas, has not objected on health grounds.

Should planning approval be forthcoming, appropriate conditions to address the prior testing and forwarding of results, to the EHO, of canal dredgings would be imposed to restrict importation of unsuitable materials.

In conclusion the proposals accord with national policy and the application site is considered to be well suited in respect of highway access. The potential visual impact arising from the scheme would be minimal, for Byelawhill and Woodmuir South, given the proposed retention of a tree screen. In my view the visual integrity of this part of the site would be maintained. For the WMA4 site, development here would not detract from outside views over and above what would be required to restore the land to its existing approved afteruse.

In terms of environmental nuisance i.e. noise and dust, these are considered minimal with that of odour being mitigated by increasing parameter standoffs and the imposition of a rigid odour monitoring/mitigation scheme.

The use of sewage sludges, in a forestry context, would act as a facilitator to enhance the existing soil medium; promote forestry regeneration as well as providing, subject to appropriate safeguards, a sustainable use of sewage sludge.

In light of the points it is considered the application is acceptable in planning terms.

**Iain Urquhart,  
Executive Director (Enterprise Resources)**

**4 April 2005**

**Previous References**

- ◆ None.

**List of Background Papers**

- ▶ Application Form
- ▶ Application Plans
- ▶ Further details/correspondence with applicant company:
  - Letter from Portcullis Developments Ltd. - dated 02/12/04
  - Letter from Portcullis Developments Ltd. – dated 22/05/06.

▶ Consultations

Scottish Water	22/07/2004
Planning & Building Control	22/07/2004
PGL	06/08/2004
Glasgow & the Clyde Valley Structure Plan	11/08/2004
Historic Scotland	20/08/2004
S.E.P.A. (West Region)	17/11/2004
Environmental Services	12/11/2004
Scottish Wildlife Trust	08/11/2004
S.E.P.A. (West Region)	02/12/2004
Scottish Natural Heritage	24/02/2005
Director of Mining Projects & Property	24/02/2005
Scottish Executive Development Department	20/07/2004
Forestry Commission (Central Scotland Conservancy)	20/01/2005
Glasgow & Clyde Valley Structure Plan Manager	06/08/2004
Health & Safety Executive	24/02/2005

Health & Safety Executive	08/07/2004
Roads and Transportation Services (South Division)	14/07/2004
Power Systems	25/10/2004
Scottish Wildlife Trust	08/11/2004
Scottish Executive Environment & Rural Affairs Dept. (SEERAD)	20/07/2004
Scottish Water	21/07/2004
West of Scotland Archaeology Service	15/07/2004
Scottish Executive Environment & Rural Affairs Dept. (SEERAD)	12/07/2004
Planning & Building Control HQ	22/07/2004
Scottish Natural Heritage	27/10/2004
Lanarkshire Health Board	22/10/2004
Transco	
Coal Authority	18/02/05

► Representations

Representation from : Mr J Paterson, 5/8 Pleasance Row, Wilsontown, Forth,  
DATED 06/08/2004

Representation from : Mr David Nelson, Schoolhouse, Wilsonton, Forth, Lanark  
ML11 8EP, DATED 06/08/2004

Representation from : Mrs Mary Lindsay, Heathland Farm, Wilsontown, Forth  
ML11 8EP, DATED 15/03/2005

**Contact for Further Information**

If you would like to inspect the background papers or want further information, please contact:-

Minerals Officer, Planning & Building Control HQ, Montrose House  
Ext. 3608 (Tel :01698 453608)  
E-mail: Enterprise.hq@southlanarkshire.gov.uk

## CONDITIONS

- 1 The development hereby permitted shall be commence within 6 months of the date of this permission.
- 2 The Planning Authority shall be notified, in writing, 7 days prior to:
  - (i) The commencement of ground preparation works within each of the three land areas.
  - (ii) The completion of the importation of soil amendments within each of the three land areas.
  - (iii) The completion of restoration within each of the three land areas.
- 3 All operations authorised or required by this permission shall cease, and all site structures and haul roads shall be removed and the site restored in accordance with the conditions of this permission not later than 24 months from the date of this unless permission otherwise approved, in writing, by the Planning Authority.
- 4 Except as may be modified or required by the other conditions to this permission by the Planning Authority, none of the uses, operations and activities associated with the development hereby approved shall be carried out other than in accordance with
  - (i) The details as set out in the application letter from Johnson Poole and Bloomer of 23 June 2004 and accompanying report entitled "Planning Application for the Proposed Reclamation of Failed Forestry Areas at Historical Opencast Coal Sites and Abandoned Wester Mosshat OCCS (Area 4) Utilising Imported Soil Amendments in Preparation for Future afforestation with Public Access and Nature Conservation Features at Byelawhill, Woodmuir South and Wester Mosshat (Area 4) by Forth"
  - (ii) Volume 2 Support Statement and Environmental Statement June 2004 and drwg Nos:
    - " DG/693/PA/F/01 entitled "Site Location Plan".
    - " D6693/PA/F/03 entitled "Byelawhill Site".
    - " DG693/PA/F/04 entitled "Woodmuir South Site".
    - " D6693/PA/F/05 entitled "Wester Mosshat Area 4".
    - " DG693/PA/F/07 entitled "Proposed Final Ground Levels".
  - (iii) The letter from Portcullis Developments ltd of 2 December 2004.
  - (iv) The letter of 23rd February 2005 and accompanying document entitled "Method Statement, Incorporation of Biosolids for Topsoil Regeneration on Poorly Restored Opencast Sites, Site:- Wester Mosshat Area 4 by Forth, South Lanarkshire, dated February 2005.

- (v) Notwithstanding the terms of the above, no more than 3,500 tonnes of soil amendments per hectare should be used over an area of 15 hectares.
- 5 From the commencement of development until its completion, a copy of this permission, including all documents hereby approved and any other documents subsequently approved in accordance with any conditions of this permission shall be kept available for inspection on the site during the prescribed working hours.
- 6 All the existing hedges and fences on the site boundary shall be made stockproof, maintained and protected from damage throughout the period of operations until the restoration of the site has been completed. Where the operational boundary does not coincide with an existing hedge, fence or ditchline the operator shall provide, prior to commencement of operations, stockproof fencing which shall be maintained throughout the period of operations. Except as may otherwise be approved in writing by the Planning Authority, undisturbed hedgerows within, or bounding the site shall be carefully maintained, cut and trimmed at the proper season throughout the period of working and restoration.
- 7 No development shall take place within the Byelawhill and Woodmuir South land areas until a revised scheme of working has been submitted to the Planning Authority. The scheme shall then be implemented in accordance with the details as approved, in writing, by the Planning Authority. The submitted scheme shall make provision for:
- (i) Physical demarcation of standoff areas
  - (ii) Physical demarcation of 'sludge application' areas
  - (iii) Provision of perimeter surface water drainage and settlement lagoons
  - (iv) Procedure for desilting the lagoons
  - (v) Procedure for destaling the wheelwash
  - (vi) Site compound area
  - (vii) Programme of implementation (Including provision for representative samples of each batch of materials to be analysed for heavy metals. Such test should be carried out by a NAMAS accredited laboratory the results submitted for the consideration and approval of the Council's Environmental Health Officer prior to such material being taken onto the site)
- 8 No ground preparation works, or importation of soil amendments, as defined in the Approved Details set out in Condition (4) of this permission, other than tree felling and tree clearance shall take place concurrently within the Wester Mosshat Area 4, Byelawhill and Woodmuir South Land Areas. Authority, undisturbed hedgerows within, or bounding the site shall be carefully maintained, cut and trimmed at the proper season throughout the period of working and restoration.
- 9 No importation of soil amendments, as defined in the Appropriate Details set out in Condition (4) of this permission, shall take place within the Byelawhill and Woodmuir South Land Areas until ecological surveys have been submitted to the Planning Authority. The scheme shall then be implemented in accordance with the details as approved, in writing, by the Planning Authority. The submitted scheme shall make provision for:
- (i) Phase 1 Habitat Survey
  - (ii) Measures to safeguard floral interests
  - (iii) Programme of implementation

- 10 All site traffic shall enter and leaving the site by using the existing internal haul road to the site and identified on drwg no: DG693/PA/F/0 submitted with the application documents.
- 11 That the public road adjacent to the site shall be kept clear of mud or other deposited material at all times.
- 12 No servicing, maintenance or testing of plant shall take place other than within the site compound area.
- 13 Vehicles when not being used shall only be parked in the site compound area.
- 14 (a) Except as provided at (b) below, no operation authorised or required by this permission shall be carried out on the site except between the following times:
- |                   |                    |
|-------------------|--------------------|
| 0800 - 1900 hours | Mondays to Fridays |
| 0800 - 1300 hours | Saturdays          |
- (b) There shall be no working or maintenance activities on Sundays or National or Local Holidays

This condition shall not apply in cases of emergency when life, limb or property are in danger. The Planning Authority shall be notified, in writing, as soon as possible after the occurrence of any such emergency.

- 15 All rubbish and scrap materials generated on the site shall be collected and stored on a tidy manner, in a screened position within the site area until such time as they may be properly disposed of within the excavation void, or to a suitably licensed waste disposal site.
- 16 No materials including minerals, shall be imported to the site unless otherwise provided for by other conditions of this permission, or as may otherwise be agreed in writing with the Planning Authority.
- 17 Efficient silencers shall be fitted to, used and maintained in accordance with manufacturers' instructions on all vehicles, plant and machinery used on the site. Save for the purposes of maintenance, no machinery shall be operated with the covers opened or removed
- 18 Reserving alarms used on plants and vehicles on the site shall be either non-audible, ambient related, or low tone devices.
- 19 Between the hours of 0800 and 2000 the measured noise level emitted from the site (LAeq(1hour) shall not exceed the pre-existing background noise level (LA90 (1/2 hour) by more than 4dB(A) when measured in accordance with BS4142 : 1997 at buildings where people are likely to be affected. Between the hours of 2000 and 0800 the noise level emitted from the site (Laeq(5min) shall not exceed the pre-existing background noise level (LA90 (1/2 hour)) by more than 4dB(A) when measured in accordance with BS4142 : 1997 at buildings where people are likely to be affected.

Work associated with this development shall conform to the terms laid down in BS5228 Parts 1-4 1984/1986 'Noise Control and Construction and Open Sites' to the satisfaction of the Executive Director of Community Resources.

- 20 At all times during the carrying out of operations authorised or required under this permission water bowsters, sprayers, whether mobile or fixed shall be used at such times as it is necessary to minimise the emission of dust from the site. At such times as the prevention of dust nuisance by these means is not possible the site operations giving rise to the dust generation shall temporarily cease until such time as the weather conditions improve.
- 21 The operator shall ensure that sufficient water is maintained onsite to address the sites requirement for dust suppression.
- 22 No importation of soil amendments, as defined in the Approved Details set out in Condition (4) of this permission, shall take place until a revised odour management scheme incorporated monitoring and mitigation measures set against 'trigger' levels of action to any odour generate on has been submitted to the Planning Authority. The scheme shall then be implemented in accordance with the details as approved, in writing, by the Planning Authority.
- 23 Any oil, fuel, lubricant, paint or solvent within the site shall be stored so as to prevent such materials contaminating topsoil or subsoil or reaching any watercourse.
- 24
  - (a) Any fixed or free standing oil or fuel tanks shall be surrounded by a fully sealed impermeable enclosure with a capacity not less than 110% of that of the tanks so as to fully contain their contents in the event of any spillage;
  - (b) if there is multiple tankage, the enclosure shall have a capacity not less than 110% of the largest tank;
  - (c) all filling points, vents and sight glasses shall be within the sealed impermeable enclosure; and
  - (d) there shall be no drain through the impermeable enclosure. (The applicants attention is drawn to the requirement set out in BS 799 Part 5: 1987.)
- 25 All foul drainage shall be contained within a sealed and watertight cesspit fitted with a level warning device constructed to BS 6297 "Design and Installation of Small Sewage Treatment Works and Cesspools" (1983).
- 26 No foul or contaminated surface water or trade effluent shall be discharged from the site into either the ground water or surface water drainage systems.
- 27 Prior to discharge to any watercourse, all contaminated site drainage shall pass through suitably sized oil/grit interceptors details of which shall require the approval, in writing, of the Planning Authority in consultation with Scottish Environmental Protection Agency.

- 28 No drainage from the site, or from areas immediately adjoining the site, shall be interrupted either partially or fully by the operations hereby approved except as may otherwise have received the prior written approval of the Planning Authority in consultation with Scottish Environmental Protection Agency.
- 29 Notwithstanding the provisions of Article 3 and Part 16 of Schedule 1 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 as amended, no buildings, fixed plant, machinery, structures whether mobile or fixed, lagoons, or other structures shall be erected or placed on the site except with the prior written approval of the Planning Authority.
- 30 No movement of soils or soil making materials shall take place except when the full depth of soil to be stripped or otherwise transported is in a 'suitably dry' soil moisture condition. Suitably dry means the soils shall be sufficiently dry for the topsoil to be separated from the subsoil without difficulty so that it is not damaged by machinery passage over it. The criteria for defining suitably dry soil moisture conditions are set out in point (2) of Notes to Applicants attached to this permission.
- 31 Within 2 months of the date of this permission a scheme for restoring the site shall be submitted to the Planning Authority. The scheme shall be implemented in accordance with the details as approved, in writing, by the Planning Authority. The submitted scheme shall make provision for:
- (i) Removal of all site structures and haul roads (or their reduction in width).
  - (ii) Notification of when areas of restored land have been completed for checking by the Planning Authority.
  - (iv) Site water drainage.
  - (v) The provision of any wetlands features together with appropriate cross-sections, levels and engineering drawings.
  - (vi) A programme of implementation which provides for the progressive restoration of the site.
- 32 Within 2 months of the date of this permission a scheme for landscaping the Wester Mosshat Area 4 site shall be submitted to the Planning Authority. The scheme shall be implemented in accordance with the details as approved, in writing, by the Planning Authority. The submitted scheme shall make provision for:
- (i) The provision of any fencing, including details of their location, type and design to be erected and protective treatment.
  - (ii) Seeding, including seed specification mixture and establishment of any grassland areas.
  - (iii) Planting species, size, numbers and location.
  - (iv) A programme of implementation to include the provision for planting during the first available season following restoration.
  - (v) Boundary treatment.
  - (vi) A programme of maintenance.
- 33 For the first five years following implementation of the landscaping scheme, all planting shall be maintained in accordance with the principles of good forestry and husbandry and any trees or shrubs which die or become seriously damaged or diseased shall be replaced with plants of the same species or such species as may otherwise be approved by the Planning Authority.



- 34 Within 2 months of the date of this permission, or within such longer period as may be approved in writing by the Planning Authority, aftercare schemes appropriate to the approved landscaping scheme as provided for under Condition 35 of this permission shall be submitted to the Planning Authority for approval. The aftercare schemes shall then be implemented as approved by the Planning Authority or as may subsequently be approved, in writing, by the Planning Authority.

The schemes shall:

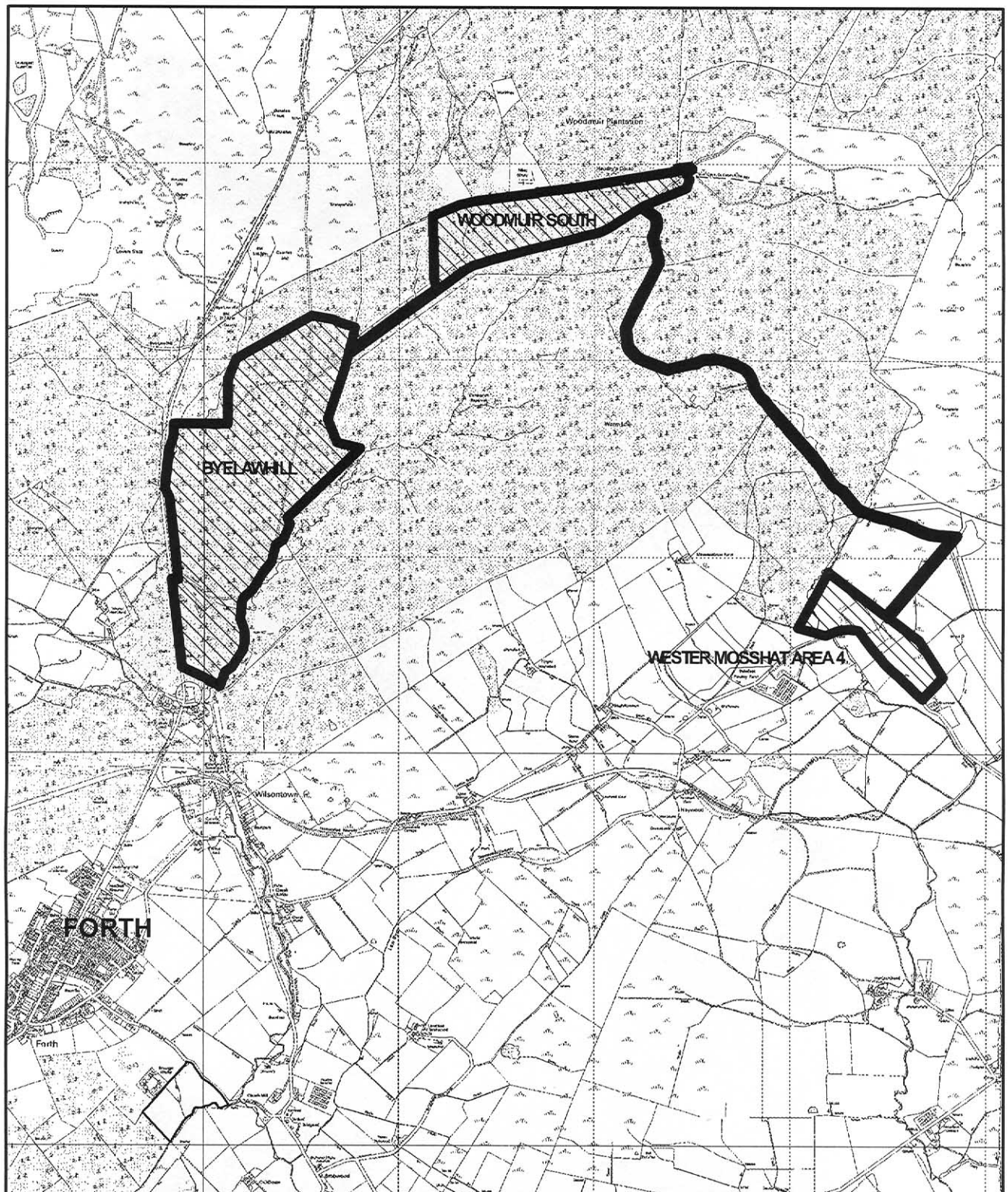
- (i) Specify the steps to be carried out and their timing within a five year aftercare period.
  - (ii) Provide for annual meetings with representatives of the Planning Authority, Forestry Authority and landowners to review performance.
  - (iii) All areas subject to the aftercare schemes shall be clearly defined on a plan together with the separate demarcation of areas as necessary according to differences in management.
  - (iv) The period of aftercare for the site or any part of it shall commence on the date of written certification by the Planning Authority that the site or, as the case may be, the respective part of it, has been satisfactorily restored.
- 35 In the event of site operations/land reclamation being discontinued for two months in the period specified in Condition (3) the site shall be restored in accordance with a scheme submitted by the developer which has the written approval of the Planning Authority. The scheme shall be submitted not later than one month from the Planning Authority's issue of written notice that it is of the opinion that land reclamation work has not taken place in the six month period and shall include the requirements of Conditions 31 - 34 inclusive of this permission. The scheme, as approved by the Planning Authority, shall be commenced within three months of notification of determination of the scheme and shall be fully implemented within a further period of 12 months or such other period as may be approved by the Planning Authority.

## REASONS

- 1 To ensure that all operations are carried out within an acceptable timescale and to prevent prolonged disturbance to the local environment.
- 2 To ensure that all operations are carried out within an acceptable timescale and to prevent prolonged disturbance to the local environment.
- 3 To ensure that all operations are carried out within an acceptable timescale and to prevent prolonged disturbance to the local environment.
- 4 To clarify those details approved.
- 5 To ensure that the site operators and visiting persons are aware of the approved details.
- 6 To ensure the maintenance of boundaries.
- 7 To ensure that suitable control is placed on the development.
- 8 To ensure that suitable control is placed on the development.
- 9 To ensure that suitable control is placed on the development.
- 10 To clarify those details approved and in the interests of pedestrians and vehicular traffic safety.
- 11 To clarify those details approved and in the interests of pedestrians and vehicular traffic safety.

- 12 To clarify those details approved and in the interests of pedestrians and vehicular traffic safety.
- 13 To clarify those details approved and in the interests of pedestrians and vehicular traffic safety.
- 14 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 15 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 16 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 17 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 18 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 19 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 20 To minimise any nuisance and to protect the amenities of neighbouring properties.
- 21 To ensure provision is made for land drainage and protection against contamination.
- 22 To ensure provision is made for land drainage and protection against contamination.
- 23 To ensure provision is made for land drainage and protection against contamination.
- 24 To ensure provision is made for land drainage and protection against contamination.
- 25 To ensure provision is made for land drainage and protection against contamination.
- 26 To ensure provision is made for land drainage and protection against contamination.
- 27 To ensure control over such development on the site so as to minimise the potential visual and landscape intrusion.
- 28 To preserve the quality of the soils and to secure the eventual restoration of the site.
- 29 To preserve the quality of the soils and to secure the eventual restoration of the site.
- 30 To preserve the quality of the soils and to secure the eventual restoration of the site.
- 31 To provide for a comprehensive scheme of restoration enabling the land to be returned to the specific restoration after-use.
- 32 To provide for the return of the site to the required standard for the specific after use during the five year aftercare period.
- 33 To ensure the reclamation of the site and to integrate the restored land into the landscape.
- 34 To ensure a comprehensive scheme of landscaping.
- 35 To ensure a comprehensive scheme of landscaping.

# **BYELAWHILL, WOODMUIR SOUTH & WESTER MOSSHAT AREA 4** **SITE LOCATION PLAN**



**Map at Scale 1:30000**



*This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office.*

*Drawn 18/03/2005*