SUPPLEMENTARY REPORT

PLANNING COMMITTEE (8th March 2021)

OBSERVATIONS/REPRESENTATIONS RECEIVED SINCE COMPLETION OF REPORT

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18/01217/OUTM — Outline planning permission (with all matters reserved except access) for the construction of up to 520 dwellings and an area of up to 12.78 hectares for the provision of employment floorspace (Use Classes B1/ B2/ B8) including; two points of access from Cricket Lane; comprehensive green infrastructure including footpaths, cycle ways, multi-functional open space, children's play areas, open space for sport and sustainable water drainage infrastructure including balancing ponds, rerouting of Ash Brook and other associated ancillary infrastructure and ground remodelling.

Land at Cricket Lane, Lichfield, Staffordshire

Revised Recommendation: That the consideration of the application be deferred.

Following representations received after the committee report was published, officers have reviewed these matters. Whilst officers are satisfied that all legal matters have been addressed within the report; as raised by other parties, additional matters have come to light in relation to CIL and Infrastructure Delivery Statement, that do need further clarification and therefore, it is recommended that the consideration of this application be deferred until a subsequent meeting of the planning committee to allow these matters to be fully addressed.

Additional Consultation Responses:

Lichfield & Hatherton Canal Restoration Trust — At Planning Committee on Monday 8 March, Members will be asked to approve the above planning application. Lichfield and Hatherton Canals Restoration Trust (LHCRT) has carefully reviewed the Officer's report and taken appropriate expert advice. On the basis of that advice, we advise Councillors that the Officer's report is flawed. It contains factual inaccuracies, and it fails to comply with the requirements of the statutory Local Plan.

The statutory Local Plan contains specific protection for the route of the Lichfield Canal. Together with requirements contained for the Strategic Development Areas (SDA) in the Infrastructure Delivery Plan (IDP), there are requirements for SDA developers to provide specifically identified canal bridges and associated structures. The Cricket Lane SDA has such a requirement for the provision of a canal bridge and associated works.

The Officer's report has failed to demonstrate that the proposed Cricket Lane/Tamworth Road junction improvements, which are fundamental to meeting the needs of the development, are compatible with the engineering requirements and alignment of the canal bridge and its associated works. The applicant has accepted that it is necessary to raise the level of Cricket Lane to achieve a highway alignment that accommodates the bridge. Existing levels are maintained at the junction stop line. No detail of road profile or gradients are provided to demonstrate that the improvements are compliant with highway design and safety standards.

With respect to the canal, the report places great emphasis on the need for consistency in approach between the Deanslade Park, South of Lichfield, and Cricket Lane SDAs.

In considering the South of Lichfield SDA, the Council required provision of full details to prove that the development, the canal, and the Lichfield Southern Bypass would all fit within the available land area. For

reasons hitherto unexplained, the Council has not required a similar approach be taken for Cricket Lane. This represents an inconsistent approach (06/03/2021).

Previous Comments: Request the application be deferred for consideration on the following grounds:

- 1. The officer's report contains factual errors, which makes the recommendation to approve the application unsound;
- 2. LHCRT considers that the basis for the report decision that the applicant should not provide the required Cricket Lane canal bridge and associated works (lowered canal section, retaining walls, services needing re-routing), either by inclusion in works or through S106 funding, is legally flawed and incompatible with the adopted Local Plan and its associated SDA and IDP policies;
- 3. The planning officer has failed to ensure that the proposed road improvements at the junction of Cricket Lane with Tamworth Road, which are required as a direct consequence of increased road traffic created by the development, are compatible with the planning policy requirements for the protection of the canal and provision of the canal bridge and associated works; and
- 4. The council has failed to notify LHCRT, as a major objector, of the date of the committee meeting at which the application is to be determined. Other objectors were notified.

Enlarging on points 1 -4 above:

Point 1 – The committee report claims consistency between requirements for provision of canal bridges for the three SDAs: Deanslade Park, South Lichfield and Cricket Lane. This is not correct. The Deanslade Park development does not generate a requirement for offsite highway improvements at the canal crossing point.

The South Lichfield development does generate a requirement for provision of a section of the Southern Bypass. The canal is located within the development red line boundary. Most of the development is located to the south of the line of the canal and access to development from the bypass is across the line of the canal. Bridges are being constructed at the expense of the developer. The Cricket Lane development does generate a requirement for a number of offsite highway improvements, which are to be funded by the developer through the S106 agreement. The Cricket Lane/Tamworth Road junction improvement is one of those required improvements. The requirement for the canal crossing at that location with its fixed levels has to be incorporated in the design.

The council has not required the canal bridge for Deanslade Park to be provided at developer cost. The council has required the canal bridges for South Lichfield to be provided at developer cost. Since Cricket Lane, as is the case at South Lichfield, does involve physical work at the canal crossing location, in applying the consistency argument it would be expected that the developer would provide the canal bridge and associated works.

Point 2 – Adding further weight to point 1 above, that the Deanslade and Cricket Lane situations are not identical, the stated planning/legal basis for not including the obligation to provide Cricket Lane canal bridge is basically a restatement of that put forward by the Council at the time of the Deanslade approval. LHCRT provided the Council with legal opinion demonstrating that the logic and conclusion in respect of the Deanslade case was legally flawed. When the approval without provision of the bridge was approved, LHCRT took counsel's advice on the prospect of success at Judicial Review. The advice was positive but for reasons which must remain confidential, Trustees ultimately decided not

to pursue Judicial Review. These constraints to legal challenge would not apply in the case of Cricket Lane.

Since the Council's reason for not requiring the developer to provide Cricket Lane canal bridge and associated works is basically that which they applied (in a legally unsound manner) to Deanslade, it follows that LHCRT counsel's advice remains relevant and transferable. Whilst LHCRT would welcome the opportunity to resolve the issue of bridge provision with the Council, without recourse to law, additional time is required to allow this dialogue.

It should be noted that, contrary to the assertions contained in the officer's report, LHCRT has documentary evidence, including statements from senior council officers, that the use of S106 to secure the provision of the canal crossings and associated works is lawful and required by Council policy. If necessary, this evidence can be disclosed at an appropriate time.

Point 3 — The Cricket Lane canal crossing and the canal in general has protection in accordance with the statutory Adopted Local Plan. It follows that the required highway works at the Cricket Lane/Tamworth Road junction must take account of and be able to accommodate the canal bridge. There is no evidence that the planning officer has considered this and the documents uploaded on the planning portal do not provide evidence to allow such a technical assessment to substantiate this conclusion.

In the case of the South of Lichfield SDA, the Council required fully coordinated drawings to demonstrate that the bypass, canal, and development would fit within the available space and that the roads and canal crossings are compliant with highway standards. These were considered as part of the determination of the Application. LHCRT worked together with Persimmon and their consultants to demonstrate the coordination and safety requirements can be delivered. LHCRT considers the Council to be inconsistent in failing to similarly apply this approach at Cricket Lane. It should be noted that in the case of Cricket Lane, LHCRT initially worked with Persimmon and their consultants by providing the technical requirements for the canal bridge. There is no reason why the canal bridge could not have been fully included in the current outline planning application since this would not have committed Persimmon to build or fund the bridge construction. Without this technical assessment there is no evidence that the proposed highway works do not prejudice the physical provision of the bridge at some time in the future.

The Transport Assessment Addendum makes reference to the Lichfield Canal in Chapter 6 and confirms that the road will require raising to accommodate the canal bridge and it is incorrectly stated that the drawings contained in Appendix B show how this can be achieved in future. However, Appendix B drawings consist of a single plan showing an undimensioned footprint for the canal bridge, with no technical details of sizes, levels or dimensions. Since it is accepted that the road must be raised for the canal and the levels at the junction stop line are to be maintained, it is necessary to show that the road gradient between bridge and junction is compliant with highway standards and safety requirements including sight lines and visibility.

Since no such evidence has been provided, the planning officer cannot reasonably conclude that the development design does not prejudice the future restoration of the canal.

Point 4 – The Council is repeating the errors made in its handing of planning application 17/01191/OUFMEI Deanslade Park, which LHCRT considers had a similar requirement for the developer to provide Claypit Lane canal bridge. In that case, the Council failed to notify LHCRT of the Planning Committee's date for consideration of the application, and the officer's report failed to advise that LHCRT was an objector and to report the basis of the Trust's objection. Once LHCRT discovered that approval had been granted and raised

this with the Council, it was accepted that there had been procedural errors and the approval was rescinded. Although subsequently approval was given, without the provision of the canal bridge, this involved considerable officer time and also the cost of legal opinion. Given this experience, LHCRT has sought to engage with the Council in advance in respect of Cricket Lane. Based on the exchanges of emails between LHCRT and the Council, we had an expectation of being informed of the Council's view on funding of the canal bridge and associated work, and of being provided with advance notification of the intended Committee date. This would allow us sufficient time to prepare and present our necessary representations.

In summary, it is regrettable that the Council has failed to notify LHCRT, leaving the Trust insufficient time to provide evidence to counter the officer's opinion. The Trust believes that it is appropriate, proportionate and in the interests of all parties to seek to resolve the issue of provision of the bridge and associated works, through discussion, rather than having recourse to law. However, this will not be possible if the application is determined as currently timetabled. The Trust requires reasonable time to consider and take further advice on the content of the report, as we were previously given to expect by the Council's planning officer. The Council has already received a detailed response to the officer's report from the IWA, which also argues the extent to which the report is flawed. Notwithstanding that the Trust has secured the right to address Planning Committee on Monday evening, we request confirmation of Council agreement to defer consideration of the application, in order to allow immediate dialogue (04/03/2021).

Lichfield & Hatherton Canal Restoration Trust -Object to the development, until such time that it is clear that funding has been found from either or both of Lichfield District Council and the Developer (Persimmon Homes) to deliver the lowered section of the canal and the bridge to achieve navigable clearance under the improved road crossing at Cricket Lane, alongside the junction with Tamworth Road. Note from the committee report that road improvements are proposed at this location.

The provisions of the Infrastructure Delivery Plan (IDP) are not normally legally-binding on Developers nor on the Planning Authority, but the provisions in the present IDP, in respect of the Cricket Lane development, are backed-up by a written assurance to Lichfield & Hatherton Canals Restoration Trust that the necessary provision for the canal at this location will be achieved, without recourse to LHCRT funds.

That assurance, which we consider to be legally binding on Lichfield District Council, came about when the Local Plan document went forward for formal adoption, without the words regarding provision for the canal at Cricket Lane, due to an administrative error. Rather than delay the Adoption process and for it to become publicly visible that words, which should have been included in the document, had been accidentally omitted, the assurance was given to us that the IDP would contain the words and LDC would ensure the work was done as if those words were part of the Local Plan.

Thus, expect the decision of the planning committee to ensure that, with contributions from Persimmon Homes and/or from Lichfield District Council, the formation of the lowered canal channel (including diversion of services buried there) and the construction of the road bridge, will be incorporated as obligations on the Developer, recorded in conditions of the Planning Consent granted to Persimmon Homes.

Request notification if the application is to be deferred to allow for further discussions within LDC and Persimmon Homes. If the decision is to proceed without the necessary provisions for the canal - as previously committed to us by Lichfield District - I am sure that the Trustees of LHCRT will feel they have no option but to raise the appropriate formal legal challenge to the Decision. To fail to do so would put us in breach of our legal obligations as Trustees of our Charity with a very significant, additional financial cost to our programme of work to complete the Lichfield Canal (02/03/2021).

Inland Waterway Association – Section 11 of the Planning Report addresses the deliverability of the Canal Bridge and related canal channel works necessary for restoration of the Lichfield Canal. It sets out the relevant Local Plan policies, including the Infrastructure Delivery Plan, and concludes at 11.13 that:

"The IDP requirements therefore are clear that a new road bridge is to be delivered, with the developer as lead, or through a S106 contribution or CIL provision, where applicable, along with any further necessary canal channel works."

However, subsequent sections of the report include misleading statements and reasoning as follows:

The main contention of the report (11.14) is that there should be "consistency" of approach between the 3 SDAs. But there is no merit in consistency, if the previous decision was wrong; two wrongs don't make a right; and IWA contends that the decision on Deanslade was wrong in ignoring the same requirements for a new road bridge and channel works in similar, although not identical, circumstances.

- 11.15 cites the Deanslade employment site as "a variance of approach". But this is only a small part of the Deanslade SDA and does not relate to the Canal Bridge and associated channel works identified in the IDP which are at Claypit Lane. Whilst it is regrettable that LDC has not required a developer contribution to the channel works on the employment site that was never directly covered by the IDP requirements. Therefore, this cannot be considered separately from the main site as demonstrating a variance of approach.
- 11.16 cites the Deanslade residential site decision, but does not claim that this shows a variance of approach. In fact, comparison of the two sites shows a significant difference in that the Cricket Lane application includes highway works at the site of the canal bridge whereas Deanslade does not.
- 11.17 refers to precedent and the similarity between the Deanslade and Cricket Lane sites and says:

"only if a clear factual difference between the two schemes is evidenced, could the Council reach a different conclusion, as otherwise it would be liable to challenge by the applicant, through a point of consistency."

The highway works on Cricket Lane at the site of the canal bridge, funded by S106, provide that clear factual difference between the two schemes and therefore the Council could and should reach a different conclusion. Whether or not this may be challenged by the applicant on grounds of consistency should not be a consideration. The Deanslade decision amounted to a failure of the Council to uphold its own Local Plan requirements, as IWA's legal advice at the time contended, so this is not a precedent that should be followed. A decision to require offsite S106 funding for the canal works might be liable to challenge, but if LDC are now prepared to defend the spirit and the letter of their own Development Plan then the challenge is liable to be rejected.

11.19 says that, "on-site canal works will be secured by \$106 agreement" but it does not follow that off-site works cannot be so funded. It is normal practice to fund some off-site works this way and the Cricket Lane development will fund several off-site highway works by \$106. It is therefore not "a reasonable interpretation" that the canal works can only be funded by CIL. In any case, the canal channel works are not off-site, as the site in question is the SDA and not just that part of it within the applicant's red line. Furthermore, it is admitted at 11.13 that the canal bridge is covered by the IDP so its exact position relative to the site boundary is not a limiting factor.

The main contention of the report (11.14) is that there should be "consistency" of approach between the 3 SDAs. But there is no merit in consistency, if the previous decision was wrong; two wrongs don't make a right; and IWA contends that the decision on Deanslade was wrong in ignoring the same requirements for a new road bridge and channel works in similar, although not identical, circumstances.

11.20 quotes the wording of the provision for funding canal restoration infrastructure works in the CIL Reg.123 list as: "Section 106 agreements will be required where appropriate to secure infrastructure works relating to the restoration of the Lichfield Canal for the three SDAs in the vicinity of the canal", but then shows confusion by saying this has alternative interpretations.

However, it is obvious that, "in the vicinity of the canal" simply identifies the relevant SDAs. It would be tautology to refer to the "infrastructure works relating to the restoration of the canal" as "in the vicinity of the canal". Similarly, "where appropriate" simply covers the difference between those works to be directly constructed by the developer (e.g. the canal bridges on St Johns) and those to be funded through S106 agreement. It does not relate to the NPPF test of necessity which is a separate consideration.

- 11.21 notes that the S106 and CIL are no longer mutually exclusive, which was a large part of the justification advanced for the Deanslade decision at the time. This is another significant difference which invalidates the 'precedent' argument.
- 11.22 says that "the Community Infrastructure Levy Regulations (2010) remains and continues to be the main test for whether s106 obligations are appropriate" but that cannot be the case. Many LPAs have not adopted CIL so their s106 agreements cannot be determined this way. In fact, the quoted wording of the 3 tests exactly repeats that of the NPPF (at 11.11) and it is this which provides the main test, not the CIL Regs.
- 11.23 identifies the key question as: "if the delivery of the canal bridge and associated channel works are not provided as part of this development, then would it make the scheme as a whole, unacceptable in planning terms?"

The answer to this is clearly yes, because it would not comply with the requirements of the Local Plan as detailed in the Infrastructure Development Plan. This is recognised at 11.13 (see above).

11.24 says "the lack of a canal would not hinder the wider delivery of the proposed development" but the wider allocated SDA development includes provision of the specific canal works.

The report then goes on to discuss a legal case. It concludes that a Condition requiring delivery of the bridge "prior to the first occupation of any dwellings" would not be appropriate, but that has never been suggested. 11.12 identifies that the phasing requires completion of the canal works "by full construction phase".

The suggestion that the canal *bridge "is not fundamental to the delivery of the wider housing scheme*" is wrong on two counts; it is required by the Development Plan for the wider SDA; and access to the housing is dependent on improvements to the junction of Cricket Lane, directly affecting the location of the canal bridge.

The assertion at 11.5 that these works will not affect works that the Trust would have had to do is incorrect. Construction of the junction improvement works prior to installation of the canal bridge will increase the cost to the Trust of reinstating those road works afterwards.

The reference at 11.27 to a single comment in LHCRT's legal opinion of 11/1/2019 on Deanslade (one of two legal opinions) is a red herring and ignores the many other legal arguments advanced at that time. A more relevant reference to the LPS Inspector's Report is para. 93 which includes; "the sites at Cricket Lane and Deanslade Farm also offer other benefits such as ... the provision of a section of canal." This clearly illustrates his expectation that both these sites would contribute to canal infrastructure provision.

11.28 refers to the failure of LDC to add the policy wording that they had agreed requiring "the provision of a new road bridge over the lowered canal channel and any further necessary canal channel works" to the Local Plan Strategy for Deanslade Farm, and the same mistake equally affected Cricket Lane.

That this was not done was a serious error which LDC promised would be corrected effectively through the IDP. However, the subsequent Deanslade planning decision undermined both the intent of the LPS and the wording of the IDP by its failure to require provision of the relevant canal works.

- 11.29 It is regrettable that the opportunity to correct the previous omission through the Local Plan Allocations was not taken, but it is wholly incorrect to say that, "the Policy does not include provision for the delivery of the canal or its infrastructure". It is not just the heritage towpath that is safeguarded but the route of the canal itself, which includes its towpath.
- 11.30 Acknowledges that not requiring the developer to provide or fund the canal bridge and channel works will increase the cost of and delay the delivery of the canal. This will clearly "prejudice its long term restoration" contrary to Policy IP2 of the Local Plan Allocations (as quoted at 11.3).

It is also acknowledged that there will also be additional disruption to access to the site, and that CIL receipts will not be sufficient to cover the cost of the work.

11.31 acknowledges that "Local Plan Strategy Policy IP1 requires the SDAs to deliver offsite infrastructure, in accordance with other Local Plan Policies and the IDP" and that "the IDP clearly identifies (the Cricket Lane canal bridge) will be delivered by the developer directly, through S106 agreement or CIL".

However, it is not correct to say that the CIL list "states" that "this infrastructure will be delivered, given its location off-site, through CIL contributions"; that is a false interpretation based on the previous misinterpretation of the Deanslade situation at a time before the conflict between CIL and S106 being mutually exclusive was resolved by regulation changes.

The report concludes that CIL is the appropriate mechanism for the delivery of the canal bridge and channel works, but IWA has explained in some detail above how this conclusion is based on misleading statements and reasoning. The Lichfield Local Plan requires these works to be funded by the developer through S106 and that can be the only logical and legally sound conclusion.

At 11.30 the report rightly says that "the planning balance" is "ultimately for the consideration of members".

IWA suggests that Members should make their own judgement of the evidence presented in the committee report and this rebuttal of significant parts of it, and come to a decision that the application should not be granted unless and until provision of the canal bridge and related canal channel works at Cricket Lane are fully funded through a S106 agreement (02/03/2021).

Additional Neighbour Comments

A further letter of objection have been received. The issues raised, beyond those noted within the main report, can be summarised as follows:

Highway Safety

- Dispute that the identified traffic volume figures are accurate and realistic, given the model used, fails to consider the other 2 nearby SDA sites. The true traffic volume figures are likely to be much higher and traffic type volume will increase in terms of vans and horticultural vehicles (vans, vans with trailers, and tree surgeon equipment) using the Lane as a route to the Greener Composting site.
- Larger vehicles will not be able to safely enter or leave Knowle Lane if there are any number of vehicles held at the proposed lights.
- If there are more than 3 vehicles held at the lights it will be impossible for residents at that end of the Lane to enter or leave their driveways in any direction.
- The "rat run" mentality of drivers using the Lane as a shortcut to/from/through Cricket Lane, has not been recognised and there are deep concerns about traffic safety in the Lane for pedestrians, cyclists and runners. There is no pathway in the Lane and safety will obviously be a major problem for all pedestrians whether existing or future residents form the Cricket Lane and Shortbutts Lane developments, heading along this roadway.
- There is a goods vehicle limit imposed on Knowles Lane, as there is a weak spot about half way along near Knowle Farm. Increased volume, ergo weight clearly will impact the stress that the ground is under and will affect the probability of further subsidence there. Has this been given adequate and provable consideration?
- A main factor will be the sequencing of any traffic lights, with the numerous other traffic light points within 500m of the Knowle Lane junction. From experience of having various temporary traffic lights in place for road/utility works it is clear that any increase of two way traffic is a disastrous issue. Whilst sequencing could receive better consideration than that given to temporary lights, given the limited width of Lane, congestion will still result in the use of private driveways and private verges to avoid any scrapes. Such is unacceptable and legal proceedings against the appropriate party would be a viable consideration for residents in light of any damage caused to private property.
- SCC response to concerns over sequencing is somewhat dismissive, stating that temporary lights that caused the traffic jams, had poor sequencing. No evidence is offered to demonstrate that this was the case nor what their (SCC) sequencing would be like to improve things.

The applicant has also submitted further comments on both the representations of the Inland Waterways Association and the Lichfield and Hatherton Canal Restoration Trust. Their comments are summarised follows:

The provision of funding for the canal bridge does not meet the tests for obligations reproduced below:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

The bridge is a piece of infrastructure directly related to the restoration of the canal and would be necessary even if the Cricket Lane SDA did not exist. It is therefore not directly

related to the development, nor is it necessary to make the development acceptable in planning terms.

Additional Observations

The above noted consultee representations have been received after the committee report was published. The points raised have been considered.

Whilst satisfied that all legal matters have been addressed within the report, as raised by these parties, additional matters have come to light in relation to CIL and the Infrastructure Delivery Statement that do need further clarification and therefore, it is recommended that this application be deferred for consideration until a subsequent meeting of the planning committee.

The revised condition wording as requested by the applicant is considered to be reasonable and offers improved clarity of their intention and as such, they are proposed to amended, as detailed below.

The concerns raised by the local resident have been considered in the round within the main officer's report and as part of the Highways Authorities wider consideration of this development.

Amended Condition Wording:

- 32. Before the first occupation of any of the dwellings hereby approved, the unadopted roads within the site that connect the respective dwelling to the existing public highway off-site shall be constructed and surfaced to a minimum of base course level.
- 33. Before the first occupation or use of any buildings within any phase of the development, details of the phasing for implementation and final completion timescales of the off-site highway improvements works, as they relate to that phase (as broadly shown on Drawing No. 07, Revision A, Drawing No. 0010, Revision P3, Drawing No. 0013, Revision P5 and Drawing No. 0014, Revision P3) shall be submitted to and approved in writing by the Local Planning Authority. The works so approved shall thereafter be constructed in accordance with the approved details and timescales.

Page 96 20/01238/COUM – Conversion and extension of existing barn to form gospel hall (Use class F.1 (f)) as a place of worship, with demolition of other agricultural barns and provision of car parking, landscaping and associated works Oak Tree Farm, Drayton Lane, Drayton Bassett B78 3EF

Additional Letters of Representation

79 letters from local residents objecting to the proposal have been received. They all raise issues mainly in association with transport impacts and the amenity issues created as a result. Many are also concerned about the lack of community benefit that the facility will provide.

A letter from Christopher Pincher MP has also been received setting out the concerns raised by an objector to the application.

Additional / Amended Conditions

There are no new or amended conditions proposed to that set out in the main report. However, it is to be noted that the conditions set out in the supplementary report of the February 8th Committee meeting have been incorporated into the main report being considered this evening and under relevant headings of those requiring submission following approval and those that need compliance throughout the development itself.

Additional Observations

The issues raised within the additional letters of representation have already been considered within the main report and therefore the recommendation remains one of approval, subject to a S106 and conditions.

LIST OF SPEAKERS

PLANNING COMMITTEE MEETING

8 March 2021

18/01217/OUTFLM

Mr Derek Lord Objector

(Lichfield & Hatherton Canals Restoration Trust)

Councillor Christopher Spruce Ward Councillor

Mr Ben Cook Applicant's Agent

(Pegasus Group)

20/01238/COUM

Councillor Ian Watkins Objector

(Drayton Bassett Parish Council)

Ms Chloe Bennett Supporter

Mr Andrew Beard Applicant's Agent

(AB Planning)