



Report to Lincolnshire County Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Lincolnshire Minerals and Waste Local Plan – Site Locations Document

The Plan was submitted for examination on 3 April 2017

The examination hearings were held between 25 and 27 July 2017

File Ref: PINS/Q2500/429/5

Abbreviations used in this report

AA	Appropriate Assessment
AM	Additional Modification
CD&E	Construction, Demolition and Excavation Waste
C&I	Commercial and Industrial Waste
DtC	Duty to Co-operate
EA	Environment Agency
EMAWP	East Midlands Aggregate Working Party
ha	hectare
HE	Historic England
HRA	Habitats Regulations Assessment
LAA	Local Aggregates Assessment
LACW	Local Authority Collected Waste
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
MPA	Mineral Products Association
mt	million tonnes
NE	Natural England
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
t/tpa	tonne/ tonnes per annum
WNA	Waste Needs Assessment

Non-Technical Summary

This report concludes that the Lincolnshire Minerals and Waste Local Plan Site Locations Document provides an appropriate basis for the planning of minerals and waste development in the County.

Introduction

1. This report contains my assessment of the Lincolnshire Minerals and Waste Local Plan Site Locations Document (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Lincolnshire Minerals and Waste Local Plan Site Locations Document, submitted in April 2017, is the basis for my examination. It is the same document as that published for consultation in November 2016.

Main Modifications

3. As the Plan as submitted is both sound and legally compliant, it is capable of being adopted without change and no Main Modifications (MM)s are recommended in this report.

Policies Map

4. Lincolnshire County Council (the Council) must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans in Appendix 1 and identified on the Site Locations Policies Map included in the submitted Plan.
5. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Plan.

Consultation

6. In their representations, West Deeping Parish Council (PC) expressed concerns about the consultation process for the Plan. These were: the lack of contact and meaningful engagement prior to December 2016, when the pre-submission draft plan was published; the lack of response to their concerns about a site allocation in the village; and, the limited aspects on which consultation was offered.
7. The Council has said that they have carried out consultation in accordance with their Statement of Community Involvement (SCI), adopted in 2007 and updated in 2014. The PC was included on the list of consultees at each of the relevant stages of consultation as shown in the Statement of Consultation but the Council had no response from the PC prior to December 2016. The PC had expected a response to their representation on the pre-submission Plan from

the Council. However, representations at the pre-submission are dealt with through the examination process and the Council were able to respond to the PC's concerns at the hearings. Therefore, I consider that the Council has complied with the requirements of the SCI, as set out in the Town and Country Planning (Local Planning) Regulations.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The duty requires the Council to engage constructively, actively and on a continuing basis with neighbouring local planning authorities and prescribed bodies when preparing development plan documents. Both waste and minerals planning involve cross-border movement of materials and therefore it is important that the DtC is complied with fully for such plans, including neighbouring minerals and waste planning authorities.
9. The Council is part of the East Midlands Aggregate Working Party (EMRAWP) and has worked actively within that group, co-operating in providing information on aggregates, including updated information for this Plan. During the preparation of the Plan, the DtC Statement shows that the Council have continued the process of co-operative working with the relevant bodies established when preparing the Core Strategy and Development Management Policies (CS) document.
10. The Council has advanced some AMs to address matters raised in consultation responses. However, they relate to matters which do not affect the soundness of the Plan. In addition, the Council has consulted and engaged with other prescribed bodies such as Natural England (NE), the Environment Agency (EA) and Historic England (HE). As such, I consider that there is no evidence to counter the Council's view that there are no outstanding or unresolved matters which would affect the soundness of the Plan.
11. Overall, I am satisfied that, where necessary, the Council has engaged constructively, actively and on a continuing basis in the preparation of the Plan and that the DtC has therefore been met.

Assessment of Soundness

Background

12. The Council adopted its CS on 1 June 2016 and this sets out the key principles and policies for minerals and waste over the period to 2031. The Plan under examination is a lower-tier plan allocating sites for minerals and waste development to provide for the development needs set out in Policies M2 and W1 of the CS. The Plan has three policies: SL1 which sets out mineral site allocations; SL2 which safeguards the new minerals sites; and, SL3 which sets out waste site and area allocations. Development briefs for each of the allocated sites are set out in Appendix 1 to the Plan.

Main Issues

13. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified five main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the Plan is consistent with the Core Strategy; covers all the necessary topics and time period; and is soundly based on the evidence presented.

Minerals

14. The CS concluded that the only minerals for which specific allocations were required were sand and gravel. Other policies in the CS cover proposals coming forward for other minerals and underground gas storage. The CS also includes policies to safeguard minerals resources, existing minerals sites and associated infrastructure, together with development management policies for both minerals and waste.
15. Policy M2 of the CS requires the production of 42.66 million tonnes (mt) of sand and gravel over 2014-2031 (2.37mt per year) to be divided between three production areas: Lincoln/Trent Valley, Central Lincolnshire and South Lincolnshire, with production of 18mt, 9mt and 15.66mt respectively. Table 2 in both the CS and the Plan shows the shortfall for each area to be 6.76mt, 4.77mt and 8.23mt in each of the areas. The updated figures from 2014, which includes planning permissions granted or granted subject to a S106 agreement require provision over of the plan period of 4.56mt, 1.21mt and 5.35mt, respectively. Policy M2 also gives priority to extensions to existing sand and gravel quarries, with new quarries being allocated as replacements for active mining sites where they are situated in the Areas of Search shown on the Policies Map.
16. Following the site selection process, discussed further below, the Plan allocates extensions to Swinderby Airfield and Norton Bottoms Quarries in Lincoln/ Trent Valley, extensions to North Kelsey Road, Kettleby and Kirkby on Bain quarries in Central Lincolnshire and extensions to Baston No2 Quarry, West Deeping Quarry and a replacement quarry at Manor Farm, Greatford in South Lincolnshire. Together with the provision from remaining permitted reserves at existing sites, there would be more than enough provision by area for the sand and gravel required in the County. The additional sites are allocated in policy SL1 of the Plan.
17. The information in the CS has been supplemented by updates, including the 2017 Lincolnshire Local Aggregates Assessment (LAA), reporting on 2015 data, and the draft East Midlands Aggregate Working Party (EMAWP) Annual Monitoring Report, reporting on 2016 data. These show a largely continuing trend in terms of sales data, with a slight decrease in 10 year sales averages but an increase in the 3-year average and in exports. In contrast, the Mineral Products Association (MPA) has commented that these short-term increases might reflect increased economic activity, including the housebuilding envisaged in adopted and emerging district local plans. In addition, they say

that crushed rock is being substituted for sand and gravel because of uncertainties of supply. Nevertheless, the Plan has provided sufficient sites with the provision required for sand and gravel for the Plan period set out in the CS and is consistent with it. In addition, the sand and gravel supply will be the subject of monitoring, through the LAA and the annual estimates of the landbanks of the relevant minerals, as discussed below.

Waste

18. The CS sets out the waste arisings from the County based on its Waste Needs Assessment (WNA) July 2014, which was updated in May 2017. The future requirements in the CS are based on the Council's chosen option of economic growth with median recycling in the Plan period to 2031. The WNA covers the main waste streams and includes information on cross-border movement.
19. The CS, taking into account the waste hierarchy and its objective of not providing new inert or non-hazardous landfill above current levels, has calculated the waste capacity gaps arising over the Plan period. These included the need for: three further mixed Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) Waste Recycling Facilities for an annual capacity of 75,000tpa; one energy recovery facility for LACW and C&I of 200,000tpa; one specialised thermal treatment facility of 25,000tpa; three facilities for construction, demolition and excavation (CD&E) waste recycling of 50,000tpa; and, one facility for hazardous waste landfill of 25,000tpa.
20. The intention is that most waste arising in the County will be managed within the County. However, in the case of specialist facilities like specialist thermal treatment and hazardous waste landfill, there are existing arrangements for their use outside the County. Therefore the Plan only needs to make provision for sufficient land in the right locations to provide the types of facilities which are required.
21. Policy SL3 of the Plan allocates one new waste site, at Vantage Park, Gonerby Moor, Grantham for a number of potential waste uses, including resource recovery and recycling. It also allocates a further 16 waste areas where planning permission will be granted where the applicant can demonstrate the uses are in accordance with the development plan. The Plan provides for a significant over-allocation of sites and areas for different types of waste management and this should ensure that the capacity gaps identified in the CS are met.
22. The updated WNA shows an increase in the need for mixed LACW and C&I waste recycling from three to four facilities but the need for CD&E recycling has fallen from three to two facilities over the Plan period. There have been only slight changes to other waste management types. There is sufficient capacity for non-hazardous landfill for the Plan period with sufficient spare capacity for any inert waste landfill needs and no further landfill space needs to be allocated. It was argued at the hearings that the disposal of inert waste in non-hazardous landfill was a waste of resource which could be used in restoration of minerals workings, and a waste in terms of the use of non-hazardous landfill space. However, the Council's objective of not allocating any additional landfill was found sound when the CS was examined and,

despite concerns about the impact on the restoration of sites allocated in this Plan, that decision has already been taken through the CS examination.

23. Given the over-allocation of waste sites and areas in the Plan, there is sufficient flexibility in the Plan to accommodate any changes in the need for recycling facilities and no MMs are required. The need for any such changes, in any event, would be the subject of monitoring and potential review.

Time period for the Plan

24. Representations were made that the Plan would not cover the whole 15-year time horizon suggested in paragraph 157 of the NPPF. However, this Plan is a lower tier plan, implementing the policies of the CS, and in these circumstances it is reasonable for this Plan timescale to align with that of the CS.

Conclusions - Issue 1

25. Therefore I conclude that the Plan is consistent with the Core Strategy; covers all the necessary topics and time period; and, is soundly based, in terms of its evidence base.

Issue 2 – Whether the Plan makes provision for a steady and adequate supply of minerals.

26. The CS has already identified policies to ensure a steady and adequate supply for minerals other than sand and gravel and, where appropriate, the necessary landbanks for them, in policies M5 to M9. Paragraph 145 of the NPPF requires a landbank of at least 7 years for sand and gravel and at least 10 years for crushed rock. The LAA shows the 2015 landbanks for aggregates, based on 10 year average sales, which is still acknowledged to be the best indicator, having regard to the last 3 years' sales. The landbanks are: 11 years for sand and gravel, 57.4 years for limestone and an estimated 20 years for chalk, although there is very limited demand for the low quality chalk reserves available. Therefore, in terms of security of supply of aggregates, only sand and gravel sites have needed to be allocated.

Sand and gravel

27. With the allocations made in this Plan for sand and gravel, there would be a more than sufficient supply of sand and gravel, as indicated in the latest LAA. In the Lincoln/ Trent Valley area, which appears to be increasing in importance proportionately, one quarry will be likely to be exhausted towards the end of the Plan period (Whisby Quarry). However, two extensions to existing quarries in this area (Swinderby Airfield Quarry and Norton Bottoms Quarry) will assist in maintaining production in Lincoln/ Trent Valley.
28. The MPA and the promoters of the site at Newton's Farm have commented that the allocations are too few and leave the sites in the hands of only a limited number of operators, reducing the flexibility of the Plan. Although paragraph 145 of the NPPF warns against having only a few sites, there is no firm evidence to suggest that the allocated sites will not be able to provide the amounts of sand and gravel required over the Plan period.

29. The MPA has also commented that the Plan only allocates extensions to sites and replacements for exhausted sites located in the Areas of Search and this mitigates against new sites and new operators coming forward and hence is anti-competitive. However, the policy approach to new site allocation has already been set out in the adopted CS in policy M2. There is no reason why other operators could not come forward to work the replacement sites and there are a number of mineral workings on the boundaries of the County which also compete for the same markets. The operation and sales data would be the subject of monitoring in the LAA and if there were any adverse impacts on the delivery of aggregates or the landbanks for the relevant minerals, this would be likely to trigger a review of the Plan.

Conclusions – Issue 2

30. Therefore, I conclude that the Plan has made provision for a steady and adequate supply of minerals.

Issue 3 – Whether the proposed minerals site allocations are in suitable and appropriate locations; and, are effective, deliverable, fully justified by the evidence and soundly based.

Site allocations – spatial strategy

31. Policy M2 of the CS sets out the spatial strategy for the allocation of minerals sites, including giving priority to extensions and locating new replacement quarries in the Areas of Search. These are defined as: west of Lincoln and north/ south of Gainsborough for the Lincoln/ Trent Valley Production Area; Tattershall Thorpe for the Central Lincolnshire Production Area; and, West Deeping/ Langtoft for the South Lincolnshire Production Area.
32. The site allocation process for waste and minerals sites is documented in the Sites and Areas Document and its Appendices, dated November 2016. In terms of minerals sites, there was a call for sites in 2009/10, refreshed in 2014. Those sites were then considered in terms of absolute constraints (level 1) and then constraints and opportunities (level 2). Finally, sites were then assessed against their deliverability and the outcomes of other assessments, including Sustainability Appraisal, Habitats Regulations Assessment and placed in a Band from A to D. Site visits and meetings with industry representatives and District Councils were held prior to the publication of the draft Plan, which was subject to public consultation in early 2016.
33. A number of changes took place following the public consultation, including the discounting of sites previously included, for example, Lea Marsh Farm and Urn Farm. In addition, a site previously discounted, Manor Farm Greatford, was included. All of these sites fell within Band B. Although one of the discounted sites, Urn Farm, also fell partially in Band B, the Council explained at the hearings that those chosen for inclusion in the Plan were clearly differentiated as better. The need to protect Best and Most Versatile (BMV) agricultural land was taken into account and, although the limitations of using the national soil quality maps in the process were acknowledged by both site promoters and the Council at the hearings, land quality has been adequately and proportionately taken into account.

34. The role of professional judgement in the site selection process was queried at the hearings, as was the need for the Council to have considered all the reasonable, relevant and realistic options for sites available. However, the Council has considered a large range of sites in the site selection process, including those about which representations were made, a robust process has been undertaken and a logical explanation for those selected has been given.
35. The only new site included in the Plan was Manor Farm Greatford, which lies within the West Deeping/ Langtoft area and will contribute to the South Lincolnshire Production Area. All the other allocations are extensions to existing quarries and hence are within existing areas of production.

West Deeping

36. The village of West Deeping lies in the south of the County and the area has been an important area of sand and gravel production for some considerable time. The PC estimate that some 50% of the land area of the Parish has already been the subject of workings, mainly to the north and east of the village and the extension proposed in the Plan would increase the area worked by another 15%.
37. Concerns were raised that there had not been a detailed assessment prior to the allocation having been made of the impact of continued working on the people of the village or of the impact of the proposal on heritage assets, including the setting of nearby listed buildings and West Deeping Conservation Area and the archaeology of the area, as raised by Historic England (HE).
38. The reasoned justification to policy M2 of the CS sets out the reasons for preferring extensions to existing sites. These include: avoiding a proliferation of sites; allowing the Council a greater exercise of control over the release of reserves; and, giving the potential for higher standards of restoration. It can also make the best use of existing processing plant. However, it also accepted that extensions should not be allowed where there would be unacceptable impacts on the local community or the environment. Working the land in strips would ensure that there would be no intensification of the negative impacts of working on the community and the environment since the current level of working would be maintained, although it would prolong its impacts.
39. A number of representors' concerns about the local impact would need to be addressed at planning application stage, for example, noise and dust, when the detailed areas of working would be known. Similarly, mitigation and compensation, in terms of the restoration and after use of the site, including the use of the Public Right of Way (PRoW) on the site are matters that would need to be determined as part of any planning application. The proposal would also need to be the subject of a transport assessment, which would assess the impact on local roads, including the junction of King Street and the A1175.
40. In terms of heritage, since HE made their representations, a heritage impact assessment by the Museum of London Archaeological Service (MOLA) dated August 2016, has been sent to them. The PC is also aware of the report. HE considers that, although the MOLA report concludes that there would be "no impacts", this is not likely to be the case. For example, any bunding for the

development might have impacts on the setting of the Conservation Area, if left long-term as part of restoration proposals. Such matters needs to be addressed, although the Plan's general approach to the development of the site is sound and no MM is required on this issue. I note that the Council intend to add words to the Appendix to cover heritage aspects, but this is solely an issue for them to address, since their changes do not go to the soundness of the Plan. The need to take into account residential amenity and the PRoW on the site are already adequately covered in the development brief.

41. I conclude that the Plan sets out a development brief for the West Deeping extension site which takes into account the concerns of the PC and other representors which would need to be addressed at planning application stage. Although the proposed extension would mean further extraction in an area which has been subject to mining for many years, the site is within an Area of Search which had already been defined in the Key Diagram of the CS as a prime area for sand and gravel working.

Manor Farm, Greatford

42. Manor Farm was originally discounted as a replacement for Baston No 1 quarry, due to a lack of information and doubts about deliverability. However, further information and the interest of a major operator indicated to the Council that the site could be worked and would be preferable to the site at Urn Farm. There have been a small number of representations from local residents to the allocation at Manor Farm, Greatford which include the impact on local residents in terms of local amenity; traffic; archaeology; and, restoration with regard to groundwater levels from pumping to allow low level agricultural use. The development brief for this site takes these matters into account adequately, requiring further information at planning application stage to assess, and where necessary, mitigate any impact.

Sites not included in the Plan

Newton's Farm

43. As discussed above, although only 2 sites have been allocated in the Lincoln/ Trent Valley area, there is no shortfall in the overall amounts of sand and gravel provided in this area as set out in the CS. It has been said in representations that there should have been a replacement site for Whisby quarry which is likely to cease production a little before the end of the plan period. Whilst the Council has chosen not to replace it, relying instead on extensions to existing sites, the production in Lincoln/ Trent Valley would be sufficient to maintain the landbank, which would be monitored annually through the LAA. Should further sites need to be made available to maintain the necessary landbank, then a review of the Plan might need to be considered.

Lea Marsh Farm

44. Lea Marsh Farm is a site in the Lincoln/ Trent Valley area put forward by a proposed operator and within an Area of Search. The site lies within a meander of the River Trent and in its floodplain. In addition, the Council says that it is within 70m west of the Lea Marsh Site of Special Scientific Interest,

as a result of which Natural England (NE) required further details on hydrology and potential mitigation, which has not been provided. It was therefore placed in Band D.

45. The promoters say that the site could be useful in replacing Whisby quarry towards the end of the plan period and provide useful headroom in the Lincoln/ Trent Valley Area. Even though the site might provide some additional capacity in that area, sites with fewer obvious constraints have already been identified that will provide sufficient capacity over the Plan period. There are some opportunities with the site: it is near Gainsborough which is set to grow in size, the river could be used as a sustainable means of transport and the valley provides opportunities for nature conservation. However, as with the site at Newton's Farm, this site is not necessary at present and extensions to existing sites can provide the necessary production for the Plan period.

Urn Farm

46. Urn Farm, split into two areas either side of King Street, near Baston, was considered as a replacement site for Baston No 1 quarry, which will be worked out during the plan period. The site, when including the area to the east of King Street, was classed as Band C, mainly due to its proximity to Baston and other constraints like the proximity to the River Glen and two PRoWs. When this area of the site was removed, the site to the west of King Street was classed as Band B. However, the site chosen in this area, Manor Farm Greatford, had fewer constraints and scored better on flood risk than Urn Farm.

Safeguarding

47. Policy SL2 of the Plan extends safeguarding to an area of 250m around the allocated sites in the plan, which complies with the British Geological Society : *Minerals Safeguarding in England : good practice advice*. There were representations on this policy but it is sound as it stands and no MM is required. I note that the Council has proposed some further wording to cover the issues raised but this is a matter for them, since the issues raised do not go to the soundness of the Plan. At the hearings the Council explained that there are good consultation protocols with District Councils which will ensure that potential mineral production areas are not sterilised by development.

Conclusions on Issue 3

48. Therefore, I conclude that the proposed minerals site allocations are in suitable and appropriate locations; and, are effective, deliverable, fully justified by the evidence and soundly based.

Issue 4 – Whether the proposed waste site and area allocations are in suitable and appropriate locations; and, are effective, deliverable, fully justified with evidence and soundly based.

Waste site/ area allocations

49. The National Planning Policy for Waste sets out criteria for identifying suitable sites and areas for waste management facilities. They include: considering a broad range of locations including industrial sites; and, giving priority to re-using previously-developed land. Policy W3 of the CS sets the spatial strategy for new waste facilities and policy W4 sets the locational criteria for new waste facilities in and around main urban areas.
50. Two calls for sites produced one waste site and 16 waste areas, within which waste development will be acceptable subject to the guidance in the development briefs for the sites. These have been allocated in policy SL3 of the Plan. They are within existing urban areas or on the edge of them, as required by policy W3 of the CS. The development briefs in Appendix 1 to the Plan set out the range of potential waste uses for them, making provision for all the waste types for which facilities are required in the County. The Plan provides 673ha of land for waste uses (170.4ha of which are undeveloped), when the capacity study suggests only 19.5ha is needed, and it therefore gives plenty of opportunities for waste development, mainly in existing employment areas. Therefore it provides for a range of sites in a number of areas, which should satisfy all the waste needs of the County. It will be for planning applications to provide information to satisfy the issues set out in the development brief for the allocated waste site, along with the relevant CS and development management policies.
51. A number of representations have been made on the matters contained in the development briefs for the waste sites. Many of the matters raised are matters of detail which would need to be considered and addressed at planning application stage or provide contextual information which would need to be taken into account. As such they are not matters which require MMs to make the Plan sound and, where appropriate, the Council intends to make minor changes to the development briefs prior to the adoption of the Plan.

Conclusions on Issue 4

52. Therefore I conclude that the proposed waste site and area allocations are in suitable and appropriate locations; and, are effective, deliverable, fully justified with evidence and soundly based.

Issue 5 – Whether the Plan provides a comprehensive, effective and sound framework for its delivery and monitoring

53. Paragraph 145 of the NPPF states that the landbanks of aggregates minerals reserves should be used principally as an indicator of the security of supply. This is the principal indicator that will be monitored both through the LAA and the EMAMP Annual Monitoring Reports. In addition, the CS contains monitoring indicators for minerals, waste, development management and restoration. The Plan contains specific monitoring indicators for each of its three policies, SL1, SL2 and SL3, which cover the site locations for minerals,

their safeguarding and the allocation of the waste site and areas, in terms of the determination of planning applications under those policies.

Conclusions on Issue 5

54. As such, I consider that the Plan has provided a comprehensive, effective and sound framework for its delivery and monitoring.

Assessment of Legal Compliance

55. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Plan has been prepared in accordance with the Council's Minerals and Waste LDS, as revised in April 2017.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2007 and updated in October 2014. Consultation on the Local Plan has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report September 2016 sets out why AA is not necessary. Natural England supports this approach.
National Policy	The Plan complies with national policy.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

56. In accordance with Section 20(7) of the 2004 Act I recommend that the submitted Plan is adopted on the basis that it meets in full the requirements of Section 20(5) of the 2004 Act. My report covers the main issues that have led me to this conclusion.

E A Hill

Inspector

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