

SURREY COUNTY COUNCIL**CABINET****DATE: 27 OCTOBER 2020****REPORT OF: MRS NATALIE BRAMHALL, CABINET MEMBER FOR ENVIRONMENT AND CLIMATE CHANGE****LEAD OFFICER: KATIE STEWART- EXECUTIVE DIRECTOR FOR ENVIRONMENT, TRANSPORT AND INFRASTRUCTURE****SUBJECT: SURREY WASTE LOCAL PLAN: ADOPTION****SUMMARY OF ISSUE:**

The waste planning authority, Surrey County Council is responsible for determining waste related planning applications and for maintaining the Waste Local Plan. All planning applications for waste development should be determined in accordance with the Waste Local Plan which sets out how and where waste should be managed.

The current Waste Local Plan, known as the Surrey Waste Plan (SWP), was adopted by the County Council in 2008 and is now out of date, with policies that now no longer reflect current planning and environmental policy, and is to be replaced by a new plan, known as the 'Surrey Waste Local Plan' (the Plan).

The Plan seeks to ensure that enough land is available to accommodate the facilities needed to handle the equivalent amount of all waste produced in Surrey. It seeks to ensure waste is managed in the most sustainable way in accordance with national policy, including the waste hierarchy. The policies in the Plan aim to ensure that new facilities are well located and do not result in unacceptable impacts on amenity and the environment.

Similar to the existing SWP, the Plan prioritises development on land outside the Green Belt. However, given that around 70% of the County is designated as Green Belt, as a 'safety net', it also identifies five sites within the Green Belt in case more suitable sites cannot be developed. One of these allocated sites at Trumps Farm is specifically and solely intended to facilitate the development of a household waste Materials Recovery Facility by the Waste Disposal Authority.

The identification of areas or sites as suitable for waste development does not mean development will come forward or be permitted in these locations. This will depend on waste developments being promoted by the waste industry or by the County Council in its role as the Waste Disposal Authority, and these proposals being acceptable for planning permission to be granted.

During its preparation, the Plan has been subject to several stages of public consultation, sustainability appraisal, and assessment and independent examination by the Planning Inspectorate on behalf of the Secretary of State. The Plan can only be formally adopted by the Council if the examination finds it to be sound and prepared in accordance with relevant plan making legislation.

The Planning Inspectorate have now issued the report of the Inspector who examined the Plan and this states that, subject to modifications agreed by Cabinet on 17 December 2019, the Plan is sound and legally compliant, so the Council is now able to adopt the Plan.

RECOMMENDATIONS:

It is recommended that Cabinet:

1. Notes the report of the Inspector who examined the Surrey Waste Local Plan as set out in Annex 1.
2. Recommends that Council adopts the Surrey Waste Local Plan, including the Policies Map, as set out in Annexes 2 and 3, at its meeting on 8 December 2020.
3. Approves for publication alongside the adopted Surrey Waste Local Plan the required post-adoption environmental statement, as set out in Annex 4.

REASON FOR RECOMMENDATIONS:

The Surrey Waste Local Plan contains updated planning policy affecting the management of waste in Surrey and, with modifications, has been found sound and legally compliant following examination by an independent Planning Inspector. Council's adoption of the Surrey Waste Local Plan (as modified) will mean that it forms part of the formal Development Plan for Surrey and will be used when making decisions on planning applications for related development in Surrey.

DETAILS:

1. The new Surrey Waste Local Plan will be the main waste planning document for the county and will guide development associated with the management of waste. Once adopted, the Plan will form part of the Development Plan for Surrey and will be used in decision making on planning applications for waste development.
2. When work commenced on the Plan, the original intention was that it would remain in place until 2033. During the evolution of the Plan, however, the approach has changed from one of separate waste and minerals plans to a joint approach, reflecting the synergies between the two. The intention now is to move swiftly to produce a joint Surrey Minerals and Waste Plan, with an Issues and Options consultation in the Summer of 2021, taking account of the Climate Change Strategy and any recently adopted Borough and District Local Plans. The Plan will therefore be replaced substantially sooner than originally anticipated.
3. All planning in England is policy-led, and as such, decisions on planning applications have to be made in accordance with the development plan. Where there are no relevant development plan policies, or the policies are out of date, the National Planning Policy Framework (NPPF) instructs that planning permission should be granted except where the NPPF provides a clear reason for refusal or the adverse impacts of doing so would 'significantly and demonstrably' outweigh the benefits. The Plan currently carries some weight in decision making as it has been found sound by an independent Inspector and is in the process of being adopted. If the Plan is not adopted, the County Council will be in a position where speculative waste applications will be difficult to resist and the justification for any enforcement action may become compromised by virtue of the age of the policies in the SWP.

4. Cabinet is reminded that the Plan covers the management of all types of waste including that generated by households and businesses, by the construction and demolition sector, and by the wastewater management sector. Its scope is therefore broader than the County Council's role as Waste Disposal Authority.
5. The Plan is comprised of two parts:
 - Part 1 Policies which includes a vision and strategic objectives, a spatial strategy and 16 policies (See Annex 2).
 - Part 2 Areas of search and allocated sites. Areas of search are industrial estates where waste facilities might be acceptable. Allocated sites are sites which have been specifically allocated for waste management use under Policy 11a or 11b (See Annex 3).
6. The Council must also maintain an adopted Policies Map which illustrates geographically the application of policies in the adopted plan. In this case the Policies Map comprises a set of plans within the Plan documents including the maps in Section 7 of Part 1 and the maps identifying the Industrial Land Areas of Search (industrial estates) and allocated sites in Part 2.
7. The Plan contains eight strategic objectives:
 - Objective 1 To manage the equivalent amount of waste produced in Surrey - known as net self –sufficiency.
 - Objective 2 To encourage sustainable waste management in line with national targets
 - Objective 3 To see waste disposal by landfill as a last resort
 - Objective 4 To safeguard and make best use of existing facilities
 - Objective 5 To direct new facilities to the most suitable locations
 - Objective 6 To encourage innovation and best practice in order to protect communities and the environment
 - Objective 7 To keep road movements to minimum practicable levels and support sustainable transport options
 - Objective 8 To work closely with our partners
8. The Plan's policies implement these strategic objectives, detailing how and where different types of waste management could take place and identifying the issues that development needs to address. The objectives are consistent with the Waste Disposal Authority's strategy for managing household waste.
9. The Plan's spatial strategy is based on these objectives and seeks to safeguard existing capacity, encourage appropriate extensions and improvements to existing facilities and provide for the development of new facilities in suitable locations.

Industrial Land Areas of Search (ILAS)

10. The Plan's spatial strategy seeks to direct additional waste management capacity to land that has been previously developed outside the Green Belt and on sites that are well connected to producers of waste e.g. homes and businesses. However due to the difficulty of finding suitable land, most of the allocated waste

sites are in the Green Belt (see below). Only one of the allocated sites is located outside the Green Belt (at Slyfield industrial estate).

11. Given that all but one of the allocated sites are in the Green Belt, in order to provide certainty that there would be enough land in Surrey for waste related uses, it was necessary to identify suitable industrial estates where waste uses could be located in principle in the event that the allocated Green belt sites could not be delivered. This resulted in the twenty-two industrial estates identified in the Plan and referred to as Industrial Land Areas of Search (ILAS).
12. These estates are already identified, or allocated, in district and borough local plans and most are also identified in the current SWP. They are all in excess of five hectares in extent and considered by the district and borough planning authorities as potentially suitable for a range of storage and industrial uses (B2 and B8). In many instances waste uses are no different in character to other employment uses. Indeed, waste uses already exist side by side with other uses within many of these industrial estates.
13. However, it is important to note that ILAS are 'areas of search' and not allocated sites. The difference is that only a very small part of the total area will ever be needed for waste uses. In total the ILAS comprise some 350 hectares. By way of comparison, the Plan identifies a total need for only approximately 6 hectares of land for new waste related development on all sites over the lifetime of the new Plan. These are very limited land requirements for waste uses when compared to the scale of the ILAS.
14. Industrial estates are largely fully occupied, so waste development could only potentially come forward if a particular site or unit was vacated. In addition, the plots available in ILAS are likely to be small scale, often with constraints, and are unlikely to be able support the extent of new strategic waste infrastructure development required to meet the identified need. Nevertheless, the Inspector agreed that the ILAS represent an important positive component of the Plan's provision which could accommodate a range of waste uses (for a summary of the Inspector's conclusions see Annex 5).
15. The Plan states that waste facilities could also potentially be located on any suitable land identified for employment uses or industrial and storage purposes by borough and district councils. The ILAS identified are larger areas where suitable sites are most likely to be found.

Allocated sites

16. Since suitable land outside the Green Belt cannot be wholly relied upon to deliver the additional waste management capacity required over the Plan period it has been necessary to allocate sites within the Green Belt. Five sites have been allocated within the Green Belt. These allocated sites ensure that there is sufficient land allocated to meet the identified need should otherwise suitable land not come forward outside the Green Belt. Any suitable sites outside the Green Belt that do come forward during the Plan period would have preference over those allocated within the Green Belt. Indeed, as part of any planning application for development on a site in the Green Belt, it would be necessary to demonstrate that suitable alternative land outside the Green Belt was not available.

17. As shown in Table 1 below, five of the sites identified in the Plan were previously identified in the Surrey Waste Plan 2008. It is unlikely that all the allocated sites now identified would be developed within the Plan period.

Table 1 – Sites to be allocated in the Surrey Waste Local Plan

Site	Site in 2008 SWP	Green Belt
Former Weylands STW, Hersham	Yes	Yes
Land NE of Slyfield Industrial Estate, Guildford	Yes	No
Randalls Road, Leatherhead	Yes	Yes
Oakleaf Farm, Stanwell Moor	Yes	Yes
Land at Lambs Business Park, South Godstone	No	Yes
Land adjacent to Trumps Farm, Longcross	Yes	Yes

18. The allocated site at Lambs Business Park near South Godstone is currently within the Green Belt. That Green Belt status is under review as part of the submitted Tandridge Local Plan. The Tandridge Local Plan is currently undergoing examination and the inspector's report is awaited, although it is delayed as a result of uncertainty about necessary improvements to the A22 and junction 6 of the M25. Once this report is received by Tandridge District Council, the Green Belt status of the allocated Lambs Business Park site will be clarified.
19. The site adjacent to Trumps Farm near Longcross is allocated specifically for the development of a facility to process dry mixed recyclables collected from households. The need for such a facility has been identified with reference to the Surrey Joint Municipal Waste Management Strategy. For the other five allocated sites, no specific type of waste management facility is referenced in the Plan, and therefore these sites could be developed to provide a range of waste management recovery, recycling or other treatment facilities, subject to planning permission. The Plan does not allocate any sites for additional landfill capacity.
20. The Inspector recommended that an additional key development issue should be included in respect of the former Weylands STW site. Following representations from Elmbridge Borough Council and residents, any proposal for waste development will now need to include measures to prevent HGVs accessing the site via Rydens Road and Walton Park.
21. For a summary of the Inspector's conclusions regarding the ILAS and identified sites see **Annex 5**.

Protecting communities and the environment

22. Policies in the Plan require that any planning application for waste development will be subject to rigorous scrutiny to ensure that a scheme would not have any significant adverse impact on communities or the environment. This includes impacts on amenity, local air quality, landscape and transport. In many cases proposed waste developments will also require formal Environmental Impact Assessment (EIA) as required by the EIA regulations.

23. It follows that the identification of a site as an ILAS and or the allocation of a site in the Plan does not mean that any proposal for waste related development in that location would automatically be granted planning permission. Part 2 of the SWLP provides details of particular matters relating to specific areas and sites that would have to be addressed as part of any planning application alongside the requirements of other relevant policies in the Plan.

Types of waste uses

24. Waste management can take place in a number of ways and at different scales. The Plan does not specify what type of facility should be located at which site, with the exception of Trumps Farm which is allocated solely for a dry mixed recyclable facility. All applicants for planning permission will need to demonstrate that their specific proposals are suitable for the site in question. The Planning Authority will still be able to refuse applications for planning permission if there is clear evidence to suggest that impacts associated with proposals are unlikely to be satisfactorily dealt with. As set out in the objectives of the Plan as described in Paragraph 7, the Plan seeks to promote forms of treatment that are higher up the waste hierarchy. In other words, it seeks to promote recycling over energy recovery and to limit disposal to landfill.
25. Typically thermal treatment attracts the greatest level of concern from local communities. Thermal treatment is a form of energy recovery that may or may not involve the use of incineration technology; for instance, the Council's Eco Park in Shepperton is being constructed to use gasification rather than incineration. The Plan is very clear that energy recovery is only acceptable where waste cannot otherwise be recycled. Hence, an up to date assessment of the need for energy recovery facilities would always be required at the planning application stage. The expectation is that proposals for energy recovery facilities will be limited and, where they are proposed, will need to meet the strictest of criteria to protect communities and the environment. No sites have been allocated or identified in the plan specifically for thermal treatment.

The Examination process and Plan adoption

26. During its preparation the Plan has been subject to a comprehensive process of technical scrutiny and public consultation and has been amended accordingly. Following approval by Cabinet in December 2018, the Plan was submitted to the Secretary of State for independent examination in April 2019 and public hearings took place from 17 to 26 September 2019 before an independent planning inspector.
27. On 11 May 2020, the Council received the report of the Inspector (See **Annex 1**) and this confirms that, subject to Main Modifications, the submitted Surrey Waste Local Plan is 'sound' and legally compliant. In accordance with the National Planning Policy Framework (NPPF) a 'sound' local plan is one that is:
- a) Positively prepared – provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need for development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground; and,

- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and NPPW.
28. Main Modifications to the Plan are a response to the Inspector’s scrutiny of the Plan’s policy wording during the examination process. The proposed Main Modifications were agreed by Cabinet at its meeting on 17 December 2019 and subsequently published for representations between 13 January and 23 February 2020. 156 representations were received, and these were forwarded to the Inspector for her consideration together with a summary. The final Main Modifications are detailed in the Inspector’s Report and are incorporated in the final version of the Plan to be adopted at **Annexes 2 & 3**.
29. Compared to the plan submitted in April 2019, the Main Modifications do not alter the objectives or intentions of policy or change the sites proposed for allocation. They can be summarised as follows:
- The provision of improved information about the environmental context, key constraints and mitigation required, particularly for allocated sites and ILAS;
 - Improved clarity of policies and supporting text, to support effective delivery and address internal inconsistencies and ambiguities;
 - The amendment of policies and supporting text to ensure consistency with national policy;
 - The amendment of Policy 10, to ensure that it appropriately reflects the spatial strategy of the Plan;
 - Improved reference within the Plan to other mechanisms important to securing the effective implementation of its policies and proposals; and
 - The amendment of several identified monitoring triggers, to ensure robust and effective monitoring of the implementation of the Plan.
30. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, having received a report confirming the soundness and legality of the Plan, the Council may now adopt the Plan subject to it accepting the Main Modifications.
31. Some minor non-material changes to the Plan such as formatting and correction of minor grammatical errors (known as ‘Additional Modifications’) were identified as necessary and also published for information alongside the Main Modifications in January. Further such minor and non-material changes may also be needed and would be agreed by the Planning Group Manager under delegated powers.

Strategic Environmental Assessment, Sustainability Appraisal and Habitat Regulations Assessment

32. During its preparation, the Plan has been subject to sustainability appraisal (SA) and strategic environmental assessment (SEA), the findings of which are reported in the published Environmental & Sustainability Report (ESR). The SA and SEA provide an assessment of the impacts on the environment and communities likely to arise from the implementation of the Plan. The SA and SEA processes include a comparative assessment of the proposed Plan and reasonable alternatives. The findings and conclusions of the SA and SEA were taken into account as the Plan was prepared including at the Main Modifications stage.

33. The full version of the revised ESR report (dated January 2020) for the Plan, including assessment of the Main Modifications, is available on the council's website: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan/2019-2033/swp-consultation-proposed-main-modifications>. A Non-Technical Summary of the ESR will also be made available.
34. The final stage in the SEA process is the publication of a post-adoption environmental statement alongside the adopted version of the Plan. The post-adoption environmental statement explains how the outcomes of the SEA (and SA) process have been taken into account in the preparation of the Plan. A copy of the draft post-adoption environmental statement is provided at **Annex 4** for Cabinet approval.
35. During its preparation the Plan was also subject to Habitat Regulations Assessment (HRA), which considered the potential effects of waste development on sites of European importance for nature conservation located within Surrey and within 10 kilometres of the county boundary. The Plan takes account of the recommendations of the HRA report and provides specific guidance on the issues that will need to be addressed at the planning application stage for individual allocated sites and industrial land areas of search (ILAS).

CONSULTATION:

36. During its preparation the Plan has been subject to a comprehensive process of public consultation. Most recently the Main Modifications, including changes to the Policies Map, and the revised Environmental & Sustainability Report were published and consulted on from 13 January to 23 February 2020.
37. The County Council has engaged constructively and on an ongoing basis with a wide range of other bodies during the preparation of the Plan. These include the district and boroughs in Surrey and other waste planning authorities. A number of Statements of Common Ground have been signed with these organisations including one with all the eleven Surrey districts and boroughs. The Inspector concluded that this engagement clearly helped to shape and influence the Plan.

RISK MANAGEMENT AND IMPLICATIONS:

38. It is important that Surrey County Council ensures that its waste local plan for Surrey remains effective and compliant with national legislation and planning and other relevant policy. Failure to do so could lead to successful challenges to decisions on relevant planning applications, whereby they are over-turned and costs are potentially awarded against the County Council. Furthermore, all planning authorities are now statutorily required to review their planning policy every five years.
39. We are managing this risk by replacing the Surrey Waste Plan 2008 with the new Surrey Waste Local Plan to ensure that planning policy concerning the management of waste in Surrey remains up-to-date and compliant with national legislation and policy and takes account of the most recent local context affecting the management of waste.

FINANCIAL AND VALUE FOR MONEY IMPLICATIONS

40. The cost of reviewing the Plan over the financial years 2016/17 to 2020/21 was £0.273m, which has been met from existing council budgets.

SECTION 51 OFFICER COMMENTARY

41. Although significant progress has been made over the last twelve months to improve the Council's financial position, the medium-term financial outlook is uncertain. The public health crisis has resulted in increased costs which are not fully funded in the current year. With uncertainty about the ongoing impact of this and no clarity on the extent to which central and local funding sources might be affected from next year onward, our working assumption is that financial resources will continue to be constrained, as they have for the majority of the past decade. This places an onus on the Council to continue to consider issues of financial sustainability as a priority in order to ensure stable provision of services in the medium term. The Section 151 Officer supports the adoption of the Surrey Waste Local Plan which will contribute to the efficient management of waste in Surrey, and the preparation of which has been funded within the Council's existing Medium-Term Financial Strategy. The future development of any sites for waste management purposes by the County Council would be considered separately, including the associated financial implications.

LEGAL IMPLICATIONS – MONITORING OFFICER

42. As the WPA for Surrey SCC is required by the Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) to prepare development plan documents and other documents that provide the framework for delivering waste planning policy in Surrey. In accordance with the PCPA a document is a local development document (development plan document) only in so far as it or any part of it is adopted by resolution of the local planning authority as a local development document;
43. During its preparation, the Plan has been the subject of Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programme Regulations 2004, and an Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).
44. The resulting Environmental & Sustainability Report and the Habitats Regulations Assessment report were published for consultation alongside the Plan and taken into consideration when making decisions with regard to the Plan. These reports are available as background papers.
45. Section 20(5)(c) of the 2004 Act requires the Inspector to consider whether the Council has complied with any duty imposed on it in respect of the Plan's preparation. In addition, the Plan must meet the criteria for soundness in the National Planning Policy Framework.
46. The Inspector concluded at paragraph 260 of her report that with the recommended main modifications set out in the Appendix to her report the Surrey Waste Local Plan satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.
47. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 having received a report confirming the soundness and legality of the Plan, the Council may now adopt the plan.

EQUALITIES AND DIVERSITY

48. An Equalities Impact Assessment (EqIA) has been prepared under the Equalities Act 2010. We have reviewed our EqIA at each stage of the plan making process to ensure that we capture and address any equalities issues that have arisen. The EqIA was revisited to review any implications of the Main Modifications and no further issues were found.

OTHER IMPLICATIONS

49. The potential implications for the following council priorities and policy areas have been considered. Where the impact is potentially significant a summary of the issues is set out in detail below.

Area assessed:	Direct Implications:
Corporate Parenting/Looked After Children	No significant implications arising from this report
Safeguarding responsibilities for vulnerable children and adults	No significant implications arising from this report
Public Health	The Plan has reviewed the potential implications for health through a Health Impact Assessment and an Air Quality Impact Assessment. As a result there are unlikely to be significant impacts to public health as a result of the policies and sites in the Plan. In particular the Plan has policies which seek to protect human health.
Climate change	In accordance with legislation, the Plan includes policies intended to ensure that the development of waste management capacity in Surrey takes into account the need to reduce emissions of carbon dioxide and other greenhouse gases (such as methane), and to mitigate and adapt to the impacts of climate change. The potential contribution to climate change of carbon emissions arising from the waste related development of land allocated or otherwise identified in the Plan was assessed as part of the SEA/SA process, as was the need for new development to incorporate measures to render those facilities resilient to the effects of a changing climate (e.g. increased flood risk, etc.)
Carbon emissions	See above

WHAT HAPPENS NEXT

50. If Cabinet agrees with the recommendation in this report, the Plan will go forward to full Council for adoption on 8 December 2020.
51. If the Plan is adopted by the Council a notice to this effect will be published and all stakeholders on the consultation database will be informed. Following adoption there is a six-week period for legal challenges. To be successful any

such challenge would need to demonstrate that the Plan has not been prepared in accordance with the relevant legislation.

52. On adoption, the policies of the Plan will be applied by the County Council to its decisions on planning applications concerning waste management. Some of the policies will require implementation by the district and borough councils in Surrey. These policies require proposals for any type of development over a certain size to incorporate measures for the sustainable management of waste. There are also policies which safeguard existing waste management facilities from non-waste development that might hinder their operation. District and borough councils will be notified of the adoption of the Plan and be advised how to implement those policies of the Plan that affect development for which they are responsible.
53. Implementation of the Plan will be monitored to assess whether the Plan's policies are being implemented effectively such that its objectives are being met. The results of the monitoring will be published annually in the Surrey Annual Monitoring Report.
54. It is the intention that the Plan will be superseded in short order by the joint Surrey Minerals and Waste Plan. Cabinet will see the updated Minerals and Waste Development Scheme with the programme for the development of the joint plan next month. In the event that progress on this is delayed, the Plan will be subject to a statutory formal review in five years' time and the results of this will be reported to Cabinet.

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Consulted:

Public Consultation on Issues and Options 2 Sept – 25 Nov 2016
Public Consultation on Draft Plan 1 Nov 2017 – 7 February 2018
Public Consultation on Submission Plan 14 January 2019 – 10 March 2019
Public Consultation on Main Modifications 13 January – 23 February 2020

Annexes:

Annex 1: Report on the Examination of the Surrey Waste Local Plan, 11 May 2020
Annex 2: Surrey Waste Local Plan – Part 1 Policies
Annex 3: Surrey Waste Local Plan – Part 2 Sites and Areas of Search
Annex 4: Surrey Waste Local Plan – Post-Adoption Environmental Statement
Annex 5: Summary of the Inspector's conclusions re Sites and Areas of Search

Sources/background papers:

Cabinet Paper 17 December 2019- Item 8
Cabinet Paper 18 December 2018- Item 10
Report on the Examination of the Surrey Waste Local Plan, 11 May 2020 Schedule of Main Modifications – [available here](#)
Environmental and Sustainability Report, January 2020 – [available here](#)

Environmental and Sustainability Report, Non-Technical Summary. January 2020 – [available here](#)
Consultation on Proposed Main Modifications – summary of representations and county council responses – [available here](#)

In addition to the above:

- All the documents submitted to the Secretary of State in April 2019 as part of the independent examination of the Plan can be found on the council's website in the [Submission Library](#).
- All examination documents can be found on the [Examination Library](#) webpage.
- All documents associated with the consultation on the Main Modifications are available on the [Proposed Main Modifications](#) webpage.