ANGUS COUNCIL

DEVELOPMENT STANDARDS COMMITTEE - 19 NOVEMBER 2024

PLANNING APPLICATION - GROUND AT PITREUCHIE FARM, FORFAR

GRID REF: 346674: 750164

REPORT BY SERVICE LEADER - PLANNING & SUSTAINABLE GROWTH

1. ABSTRACT

1.1 This report deals with planning application No. 24/00411/FULM submitted on behalf Laird Aggregates Ltd, which relates to the proposed extension of Auchterforfar Quarry for the extraction of sand and gravel including the restoration of the land at Ground at Pitreuchie Farm, Forfar. This is an application made under section 42 of the Town and Country Planning (Scotland) Act 1997 (as amended) to develop subject to different conditions than those attached to planning permission 19/00091/FULM. Principally, the application seeks a variation to condition 1 to permit the extraction of minerals over a period of 6 years from the date of commencement of development (associated with the new permission), and restoration of the site within a period of 7 years from the date of commencement of development. The application is recommended for approval subject to conditions.

2. RECOMMENDATION

2.1 It is recommended that the application be approved for the reason and subject to the conditions given in Section 10 of this report.

3. INTRODUCTION

- 3.1 Planning permission ref: 19/00091/FULM was approved by committee at its meeting on 18 June 2019 for the extension of Auchterforfar Quarry allowing the extraction of sand and gravel including the restoration of the land at Pitreuchie Farm, Forfar. A plan showing the location of the site is provided at Appendix 1. The conditions relative to the planning permission are contained in report 204/19 which provided assessment of the proposal and it is reproduced at Appendix 2.
- 3.2 The permission allows for a quarry extension of some 10.5ha and the extraction of 1.1 million tonnes of sand and gravel over a period of 5-years with a further year to allow full restoration. It allows for the extraction of 250,000 tonnes per annum with the site worked in four phases. Quarrying operations commenced in September 2019 and the site has been worked over intervening years.
- 3.3 Condition 1 of planning permission 19/00091/FULM states: –

That extraction of minerals shall cease no later than 5 years from the date of commencement of development, and restoration of the site shall be completed within a period of 6 years from the date of commencement of development. The Planning Authority shall be notified in writing of the date of commencement of development not less than 5 working days prior to the date of commencement of development. The applicant shall obtain written confirmation from the Planning Authority that all site restoration works have been completed in accordance with the approved restoration scheme.

Reason: To ensure that the development is undertaken in accordance with the approved plans and the Environmental Impact Assessment Report.

- 3.4 The applicant has indicated that due to a number of factors, including the Covid pandemic and reduced demand for aggregate, the site has not been worked at the rate originally anticipated and therefore significant reserves in the region of 720,000t remain to be worked. At the time of application extraction had not progressed beyond phase 2.
- 3.5 The current application is submitted under section 42 of the Town and Country Planning (Scotland) Act 1997 (hereafter referenced as the Act). It seeks permission to develop the land subject to different conditions than those attached to the existing planning permission. Principally, it seeks to vary condition 1 of planning permission 19/00091/FULM, to allow the continued extraction of minerals over a further period of 6 years, and restoration of the site within a period of 7 years. The application is effectively requesting the extraction of minerals to cease no later than November 2030 with restoration of the site being completed by November 2031.
- 3.6 For this type of application relevant legislation indicates that the planning authority must only consider the question of the conditions subject to which planning permission should be granted and if they decide that permission should be granted subject to the same conditions as detailed on the earlier permission, they shall refuse the application. If they decide that planning permission should be granted subject to conditions differing from those previously attached to the permission, they shall grant planning permission accordingly. The effect of granting permission for a section 42 application is that a new and separate permission exists, with any conditions attached as appropriate. The previous permission remains extant whether the section 42 application is approved or refused.
- 3.7 The proposal does not seek to materially change any physical aspect of the development previously approved by the existing permission. The application essentially seeks additional time to work the reserves of aggregate, with the site ultimately restored in accordance with the previously approved restoration scheme.
- 3.8 The application and its accompanying Environmental Impact Assessment Report have been subject of statutory advertisement in the press.

4. RELEVANT PLANNING HISTORY

4.1 As indicated above, committee resolved to approve planning application 19/00091/FULM at its meeting on 18 June 2019. That permission allows for the extraction of sand and gravel including the restoration of the land at the current application site. That permission has been implemented.

5. APPLICANT'S CASE

- 5.1 An EIA Report along with the Non-Technical Summary (NTS) has been submitted in support of the application. Chapters 1 4 describe the development and the legal and policy framework within which the application will be determined with chapters 5 10 are classed as technical chapters which are informed by specialist reports. The EIA Report comprises the following chapters and associated appendices:-
 - 1. Introduction
 - 2. Background to the Proposal
 - 3. Quarry Development and Method of Working
 - 4. Planning and Development Framework
 - 5. Landscape and Visual Impact Assessment
 - 6. Hydrological and Hydrogeological Assessment
 - 7. Ecology

- 8. Noise
- 9. Air Quality
- 10. Recreational Access
- 11. Summary of Impacts and Mitigation

Appendix 1 – Pre-application Consultation Report

Appendix 2 – Consultee Responses to Screening and Scoping of EIA

Appendix 3 – Site Investigation and Data

Appendix 4 – Extended Phase 1 Habitat Survey

Appendix 5 – Assessment of Environmental Noise

Appendix 6 – Archaeological Assessment and Evaluation

- 5.2 The EIA Report advises that the method of working has been designed on engineering principles which will enable safe working both for site personnel and members of the public, while ensuring stability of the surrounding land. It indicates that no quarry development can be designed to have no adverse environmental impacts, although mitigation measures can negate many of these, lower the magnitude of others, and reduce the probability of significant impacts occurring. The report advises that following the implementation of the mitigation measures described in the Environmental Impact Assessment Report the overall environmental impact of the proposal is considered to be slight reducing to negligible at restoration. It concludes that, in planning terms, the proposal is in accordance with national and development plan policy and that the positive benefits identified outweigh the identified minor disbenefits.
- 5.3 In addition, a S42 supporting statement along with updated landbank information has been submitted. This indicates that it was originally anticipated that excavation operations within the Pitreuchie Extension would have been completed within 5 years from the commencement of operations. However, over the period, works have focussed more on the existing quarry excavation areas within the main Auchterforfar site than had initially been anticipated; production has been significantly affected by Covid-19; and there has been a general drop in demand for sand and gravel. As a consequence, production to date has been significantly less than originally expected and excavation operations are currently focussed within Phase 2 of the development. The application requests to extend the operational life of the extension by 6 years thereby allowing sufficient time to extract the full consented mineral reserve at the quarry at a lesser extraction rate. In all other respects, the development and restoration will proceed as presently permitted. The information opines that as the proposal has been subject to recent Environmental Impact Assessment, which demonstrated that the site can operate without any significant environmental or amenity impacts, and the site is subject to planning conditions which were only recently issued and reflect current standards, there is no requirement to alter any other aspect of the currently permitted operations or planning conditions. Restoration of the quarry would be completed in the following 12 months following the cessation of mineral extraction. The Waste Management Plan (WMP) covering the extraction area, has been reviewed and remains appropriate.
- 5.4 The approved documentation relating to the pre-commencement conditions associated with planning application 19/00091/FULM (Condition 5(a), (b), (d) (l)) have been resubmitted. These documents address the following matters site restoration and aftercare; bunding provision scheme; noise management strategy; dust management strategy; quarry liaison group arrangements; core path crossing arrangements; stone culvert stand-off measures; soil handling scheme; overhead powerline diversion arrangements, and site boundary enclosures.
- 5.5 The EIA Report, supporting statement and discharge of condition documentation are available to view on the Public Access system. A copy of the NTS is provided at Appendix 3.

6. CONSULTATIONS

- 6.1 Angus Council Roads no objection.
- 6.2 Angus Council Environmental Health no objection.
- 6.3 **SEPA –** no objection.
- 6.4 **NatureScot** no comment.
- 6.5 **Historic Environment Scotland –** no objection.
- 6.6 **Health and Safety Executive** no objection.
- 6.7 **Scottish Water –** no objection.
- 6.8 **Community Council –** no comment.

7. REPRESENTATIONS

7.1 No representations have been received.

8. PLANNING CONSIDERATIONS

- 8.1 Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 In this case the development plan comprises: -
 - National Planning Framework 4 (NPF4) (2023)
 - Angus Local Development Plan (ALDP) (2016)
- 8.3 The development plan policies relevant to the determination of the application are reproduced at Appendix 4 and have been taken into account in preparing this report.
- 8.4 The ALDP was adopted in September 2016 while NPF4 was adopted on 13 February 2023. Planning legislation indicates that where there is any incompatibility between the provisions of the national planning framework and a provision of a local development plan, whichever of them is the later in date is to prevail.
- 8.5 As indicated, the current application is made under section 42 of the Act. It constitutes an application to develop land without compliance with conditions attached to a previous planning permission. For an application made under section 42 the planning authority typically must only consider the question of the conditions subject to which planning permission should be granted. If it is decided that permission should be granted subject to the same conditions as detailed on the earlier permission, the application shall be refused. If it is decided that planning permission should be granted subject to conditions differing from those previously attached to the permission, the application should be approved.
- 8.6 In this case the original planning permission has been implemented and remains extant. Accordingly, consideration of the current application is appropriately limited to the question of the conditions to which the planning permission should be granted, and most specifically, whether it is appropriate to allow extraction to take place over a further 6-year period.
- 8.7 The land forms part of consented quarry operations and forms part of the council's minerals landbank. The applicant has indicated that reserves within the extension

area approved in 2019 have not been extracted at the consented rate and there are substantial mineral reserves that remain unworked, and the infrastructure is in place to allow those reserves to be extracted. Planning policy seeks to safeguard workable mineral reserves and to ensure they are not sterilised by other forms of development. This is a site where it has previously been determined that aggregate can be worked in a manner that complies with relevant development plan policy. Issues regarding impacts on landscape, amenity, natural and built environment, pollution, land use, transport, and restoration have all previously been found to be acceptable subject to mitigation secured through the method of working and planning conditions.

- 8.8 The original planning permission was granted at a time when the statutory development plan comprised TAYplan and the ALDP, while Scottish Planning Policy (SPP) set out Scottish Government planning policy. TAYplan and SPP have now been replaced by NPF4, but the ALDP remains the adopted local development plan for the area.
- 8.9 Assessment of the quarry extension in terms of the ALDP policy is set out in report 204/19 (Appendix 2). All details relating to the size and location of the quarry extension, its general phasing and method of operation, annual extraction limits, and the restoration and aftercare schemes would remain unchanged from those details previously approved. The broad principle of extending the duration of mineral working to allow consented reserves to be extracted is compatible with local development plan policy.
- 8.10 NPF4 now forms part of the statutory development plan, and it must be considered in determining this application and the appropriateness of planning conditions.
- 8.11 NPF4 Policy 33 seeks to support the sustainable management of resources and to minimise the impacts of extraction of minerals on communities and the environment. It indicates that the planning system should safeguard important mineral resources and ensure that sufficient resources are available to meet the demands of industry in a way that minimises the impacts of extraction on the environment and local communities. The policy identifies matters that should be considered in determining proposals for mineral extraction and in broad terms those are similar to matters previously identified in SPP, TAYplan, and ALDP policy.
- 8.12 The proposed quarry extension is consistent with the policy framework provided by NPF4 for reasons similar to those set out in the report provided as appendix 2. The matters that NPF4 policy 33 requires to be addressed through project design and mitigation are reflective of matters set out in the conditions attached to the original planning permission. Those conditions are also considered to address other matters relevant to NPF4 policy considerations.
- 8.13 The site appears to have operated since development commenced without giving rise to significant impacts on amenity, environment, or infrastructure, and it is of some relevance to note that the current application has attracted no objection. While extraction over a further 6-year period will mean that impacts associated with extraction will be experienced over longer duration, they would not exceed levels that have previously been found to be acceptable subject to appropriate mitigation. It is reasonable to conclude that continued operation, subject to the same conditions, but over a further 6-year period should not give rise to unacceptable impact.
- 8.14 The conditions that seek to regulate the way the development is undertaken and to mitigate impacts on the environment, amenity, and infrastructure remain relevant. However, as the detailed mitigation measures have been approved, the conditions can be revised and reworded such that they secure continued implementation of necessary and previously approved mitigation. The revised conditions are compatible with development plan policy and are compatible with government policy on the use of planning conditions.

- 8.15 The existing planning permission is subject of a condition that secured the provision of a restoration bond and restoration bond agreement. A condition is proposed to ensure that the provisions of the existing bond and agreement are updated and would apply to this planning permission if it is granted.
- 8.16 The proposed development complies with relevant development plan policy subject to the proposed planning conditions.
- 8.17 In terms of material considerations, it is relevant to note that this is an approved and operational quarry. It has previously been determined that mineral extraction can take place at this site subject to appropriate conditions, albeit for a time-limited period. If permission is not granted to allow an extended period of time for extraction, it would be necessary for extraction to cease and for the quarry to be restored by September 2025. That would mean over 700,000t of sand and gravel would not be available to the operator and it would affect continuity of supply to the market. This would affect the council's minerals landbank and would not be desirable.
- 8.18 In conclusion, this is an application made under section 42 of the Act. It seeks permission to undertake development in accordance with different conditions than those attached to the existing planning permission. In circumstances where the existing planning permission remains extant and has been implemented, consideration is appropriately largely limited to the question of the conditions subject to which planning permission should be granted.
- 8.19 In this case, there is an established and operational quarry at the location. It has operated without significant issue and this application, which essentially seeks approval to work the previously consented reserves over an extended period of time, has attracted no third-party objection and no objection from relevant consultation bodies. The physical extent of the quarry, its method of working, and all other details, including final restoration would remain as previously approved. Relevant information, including the EIA Report indicates that, subject to appropriate mitigation and planning conditions, the proposed extension to the extraction timeframe should not give rise to unacceptable impacts on the environment, amenity, or infrastructure.
- 8.20 The proposed development complies with relevant development plan policy subject to the proposed planning conditions. There are no material considerations that justify refusal of the application.

9. HUMAN RIGHTS IMPLICATIONS

9.1 The recommendation in this report for grant of planning permission, subject to conditions, has potential implications for neighbours in terms of alleged interference with privacy, home or family life (Article 8) and peaceful enjoyment of their possessions (First Protocol, Article 1). For the reasons referred to elsewhere in this report justifying this recommendation in planning terms, it is considered that any actual or apprehended infringement of such Convention Rights, is justified. The conditions constitute a justified and proportional control of the use of the property in accordance with the general interest and have regard to the necessary balance of the applicant's freedom to enjoy his property against the public interest and the freedom of others to enjoy neighbouring property/home life/privacy without undue interference.

10. CONCLUSION

10.1 It is recommended that the application be approved for the following reason, and subject to the following condition(s):

Reason(s) for Approval:

The development provides for the extraction of sand and gravel in a manner that complies with development plan policy as it would provide continuity of supply of material to the market while minimising the impacts of extraction on communities, the environment, and infrastructure. Amenity, environmental, and infrastructure impacts associated with the proposed development are acceptable and can be appropriately mitigated subject to the stated planning conditions and by the mitigation measures identified in the Environmental Impact Assessment Report. The proposal complies with development plan policy subject to the stated planning conditions and there are no material considerations that justify refusal of the planning application contrary to the provisions of the development plan.

Conditions:

1. That the extraction of minerals shall cease no later than 19 November 2030 being the date 6 years from the date of approval of the development. Restoration of the site shall be completed by 19 November 2031 being the date 7 years from the date of approval of the development. Within 1-month of the restoration date the applicant shall provide written notification to the planning authority that all site restoration works have been completed in accordance with the approved restoration scheme identified in figures 3.5a: Restoration Plan and 6.4a: Restored Hydrology Plan or such other scheme that is in general accordance with those drawings as is otherwise approved in writing by the Planning Authority.

Reason: To control the duration of mineral extraction and the timescale for restoration and to ensure that the development is undertaken in accordance with the approved plans and the Environmental Impact Assessment Report.

2. That except as otherwise provided for and amended by the terms of this permission, the development shall be undertaken in accordance with the provisions of the Proposed Pitreuchie Extension to Auchterforfar Quarry, Forfar Environmental Impact Assessment Report by Dalgleish Associates Limited dated February 2019. Specifically, the development shall be undertaken in accordance with the mitigation identified in Chapter 11 of the Environmental Impact Assessment Report.

Reason: To ensure that the development is undertaken in accordance with the Environmental Impact Assessment Report in order to mitigate impact of the development on the environment.

3. For the duration of this permission, the quarry excavation shall be worked in accordance with the approved Pitreuchie Quarry Extension Development Plans Phases 1 to 4 (Figures 3.1 - 3.4 of the Environmental Impact Assessment Report). No extraction shall take place out with the defined phases. Restoration within each phase shall be completed in accordance with the approved restoration scheme within 6 months of the final extraction of sand and gravel within that phase and in any case within 6 months of the commencement of extraction in any subsequent phase, unless otherwise provided for by the terms of this permission.

Reason: In order to define the limits of extraction and the phasing of development.

4. That the annual rate of extraction from the quarry area as measured in any 12-month period shall be no more than 250,000 tonnes per annum. The Planning Authority shall be provided in writing, details of annual output/ production at no more than 12 monthly intervals from the date of commencement of extraction.

Reason: In order to ensure that the development is undertaken in accordance

with the assessments against which it has determined in the interest of the environment and to monitor the annual rate of extraction.

- 5. The development shall be operated in accordance with the following requirements: -
 - (a) That the landscaping aftercare and long-term management plan as detailed within the document Condition 5(a) Restoration Scheme and Condition 5(b) Aftercare Plan (x:\566\Condition5a&b) by Dalgleish Associates Ltd shall be fully implemented and be carried out during the aftercare period of 5 years following the completion of the restoration of the site.
 - (b) That within 6-months of the date of this planning permission, the restoration bond and restoration bond agreement (ref. EF0886) between Angus Council and Laird Aggregates Limited shall be revised and updated such that it has full force and effect in relation to this permission and restoration costs are updated to reflect current and expected costs for restoration over the extended duration of extraction. The developer shall ensure that the approved bond or any other approved financial provision is in place throughout the operational life of the development hereby approved and until the site has been restored in full accordance with the approved restoration details.
 - (c) That the bund formed adjacent to the northwest edge of the application site shall be retained in place throughout the operational life of the development hereby approved.
 - (d) That the development hereby approved shall be undertaken in accordance with the Noise Management Strategy detailed in Report R19.10470/2/AF: Discharge of Planning Condition 5(e): Noise Management Strategy by Vibrock dated 11 July 2019 or such revised scheme as may be first approved by the Planning Authority following review.
 - (e) That the development hereby approved shall be undertaken in accordance with the Dust Management Strategy detailed in Condition 5(f) Dust Management Strategy (ref: x:\566\Condition5f) by Dalgleish Associates Ltd or such revised scheme as may be first approved by the Planning Authority following review.
 - (f) That the quarry liaison scheme shall be undertaken in accordance with the details contained within the document Condition 5(g) Quarry Liaison Group (ref: x:\566\Condition5g) by Dalgleish Associates Ltd. The developer shall ensure that the approved liaison scheme is maintained throughout the duration of this permission.
 - (g) That the crossing point formed between the quarry haul road and Core Path 287 (Arbroath Road to Kingsmuir Road) as detailed in Figure 5H1: Core Path Crossing Point Plan and accompanying document by Dalgleish Associates Ltd shall remain in place and be fully maintained throughout the operational life of the development hereby approved.
 - (h) That the 5m standoff formed around the perimeter of the existing stone culvert as identified on the Operational Hydrology Plan (Figure 6.3 of the Environmental Impact Assessment Report) shall remain in place throughout the operational life of the development hereby approved.
 - (i) That the topsoils and subsoils to be excavated from the extraction areas shall be stored as described in the Soils Handling Scheme (Condition 5(J)) (ref: x:\566\Condition5j) by Dalgleish Associates Ltd. Soils shall be retained for the eventual reuse as part of the progressive restoration works.
 - (j) No sand and gravel excavation or extraction works shall take place within the 6m stand-from the overhead power lines within the application site until the overhead power lines have been relocated/ diverted.
 - (k) That the boundary enclosures erected around the application site and with Core Path 287 shall remain in place and be fully maintained throughout the operational life of the development hereby approved.

Reason: In order to ensure that the site is restored and that there is financial provision to secure restoration of the site, and otherwise to ensure that the development is undertaken in a manner that mitigates impact on amenity, environment, and infrastructure.

- 6. That activities associated with the development hereby approved shall be restricted to: -
 - 0730 1730hrs Monday to Friday inclusive.
 - There shall be no working on Saturdays other than essential equipment maintenance and repair which shall be permitted only between 0730 -1600hrs.
 - There shall be no work on Sundays or public holidays.

Reason: In order to control site activity generated noise to an acceptable level in the interests of safeguarding the residential amenity of nearby noise sensitive property.

7. That no crushing, screening, or stockpiling of excavated minerals shall be undertaken within the application site.

Reason: In order to clarify the terms of this planning permission and to ensure that the impacts remain within the terms under which the application has been considered in order that the amenity of nearby occupied premises shall be adequately safeguarded.

8. That noise from all plant, machinery and operations associated with the development shall not exceed the following free field levels at the specified locations: -

| Receptor | Noise Limit (dB LAeq,1hr) |
|-----------------------------|---------------------------|
| 56 Pitreuchie Place | 45 |
| 64 Pitreuchie Place | 45 |
| 18 Restenneth Drive | 50 |
| Field Studio, Welton Corner | 53 |
| 14 Lily Wynd | 55 |
| 1 McCulloch Drive | 55 |
| 11 Gowan Rigg | 55 |

Reason: In order to control site activity generated noise to an acceptable level in the interests of safeguarding the residential amenity of nearby noise sensitive property.

9. That during soils removal and screening bund removal the noise level shall not exceed 70dBA Leq (1 hour) free field at any noise sensitive receptor. Soil removal shall be limited to a period of 8 weeks in any 12-month period and a record of the times and dates of such operations shall be kept by the site operator shall be made available to the Planning Authority upon request.

Reason: In order that the amenity of nearby occupied premises shall be adequately safeguarded.

10. That all reversing alarms fitted to vehicles or mobile plant operating within the application site shall be of either a broadband sound or non-audible type.

Reason: In order that the amenity of nearby occupied premises shall be adequately safeguarded.

- 11. That before the date falling 12 months after the date of commencement of development and thereafter at 12 monthly intervals, the operator shall submit a quarry progress plan for the written approval of the Planning Authority. Each quarry progress plan shall: -
 - (a) Provide an up-to-date survey drawing illustrating the progress of quarrying operations.
 - (b) Identify the current location of extraction areas.
 - (c) Identify the size of the quarry extraction area, areas of completed soil stripping and replacement works.
 - (d) Identify the extent of restored land and implemented landscaping works; and
 - (e) Identify the projected operations and restoration during the forthcoming 12-month period.

Reason: To assist the planning authority to retain effective control over quarry operations.

12. Before 30 June in each year during the 5-year aftercare period, a written report of (i) the aftercare operations carried out during the preceding year (or part year), and (ii) the aftercare operations intended to be carried out during the following year (or part year) shall be submitted to the Planning Authority.

Reason: To ensure effective monitoring of the aftercare of the site.

13. For the duration of the aftercare scheme, the operator shall replace all trees and shrubs planted since completion of restoration and landscaping that are damaged or diseased, or that have not survived or have been removed, with a similar number of trees or plants of the same or suitable alternative species within the first available planting season following the identification of their being in such a condition, or having been removed.

Reason: In the interests of visual amenity and effective landscape management and habitat creation and to ensure adequate measures are put in place to protect the landscaping and planting in the long term.

14. Should the extraction of sand and gravel from the site cease for a period in excess of 12 months, the extraction shall be deemed to have ceased. The Planning Authority shall be notified in writing within 1 month of the date of cessation of mineral extraction. An updated scheme for the restoration of the worked area and associated aftercare programme that shall reflect the objectives of the approved restoration scheme shall be submitted for the written approval of the Planning Authority within 2 months of the effective cessation of quarrying operations. The updated scheme of restoration and associated aftercare programme shall be implemented as approved within a year of the aforementioned unscheduled cessation of extraction.

Reason: To ensure adequate measures are put in place to secure the restoration of the quarry should its operation cease prematurely in the interests of visual amenity.

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

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APPENDIX 1: LOCATION PLAN

APPENDIX 2: COMMITTEE REPORT NO. 204/19

APPENDIX 3: EIA REPORT NON-TECHNICAL SUMMARY

APPENDIX 4: DEVELOPMENT PLAN POLICIES