

**References: Key passages**

1. The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), Regulation 27, Cumbria Minerals and Waste Development Framework, Site Allocation Policies, Reconsultation, Autumn 2001, EnergySolutions, 5<sup>th</sup> December 2011  
[ref: RSAP7](#)

The Inspector's attention is drawn to:

*the contents of the whole letter*

2. Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom, Defra, DTI and the Devolved Administrations, March 2007 [ref: LD42](#)

The Inspector's attention is drawn to:

*Page 7, paragraph 12, 4<sup>th</sup> bullet point:- "consideration of all practicable options.."*

*Page 8, paragraph 19:- "consideration of all practicable options..."*

*Page 9, paragraph 19:- "Government sees no reason to preclude controlled burial of radioactive waste from nuclear sites from the list of options to be considered...."*

*Page 24, paragraphs 19-22:- "What disposal options are available?"*

*Page 27, paragraph 33:- "Government wishes to see continued availability of disposal routes provide by the public and private sectors, and the provision of additional disposal routes where these are necessary."*

3. UK Management of Solid Low Level Radioactive Waste from the Nuclear Industry: LLW Management Plan, NDA, December 2009 ([ref: http://www.llwrsite.com/UserFiles/UK%20Nuclear%20Industry%20LLW%20Management%20Plan%20-%20Rev1%20SIGNED.pdf](http://www.llwrsite.com/UserFiles/UK%20Nuclear%20Industry%20LLW%20Management%20Plan%20-%20Rev1%20SIGNED.pdf))

The Inspector's attention is drawn to:

*Page 59, 4.6 Waste Disposal (WD)*

*2<sup>nd</sup> paragraph:- "The need for alternative disposal options considering mainly VLLW and exempt wastes is therefore identified and detailed."*

*3<sup>rd</sup> paragraph:- "Changes in LLW policy permitting the disposal of high volume VLLW to specified landfills will be explored in tandem with the location, capacities, and transportation considerations of such facilities to be optimised."*

*Page 61, WD2*

**Description**

*"Develop alternative VLLW management and disposal routes (for example, to landfill) for appropriate material as an alternative to LLWR vault disposal."*

4. UK Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry, NDA, August 2010 [ref: LD191](#)

The Inspector's attention is drawn to:

*Page 5, paragraph 1.1 and 4<sup>th</sup> paragraph starting "The majority of LLW..."*:- "The UK will generate significantly more LLW.....which means there is a need for alternative ways to manage LLW, including treatment and where necessary, the use of alternative disposal routes."

*Page 26, 3<sup>rd</sup> paragraph*:- "Alternative disposal options include: 1) the use of existing landfill sites; 2) development of new facilities on or adjacent to sites to dispose of waste from that site....; 3) development of new facilities on or adjacent to sites to dispose of waste from a number of sites; 4) use of new facilities away from nuclear sites to dispose of wastes...."

*Page 26, 5<sup>th</sup> paragraph*:- "This Strategy recognises the opportunity provide by the use of alternative sites for disposal of LLW."

5. UK Management of Solid Low Level Radioactive Waste from the Nuclear Industry: Low Level Waste Strategic Review, Issue 3, LLWR Ltd./ NDA, March 2011 ([ref: http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/LLW%20Strategic%20Review%202010%20NLWS-LLWR-16%20-%20Issue%203.pdf](http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/LLW%20Strategic%20Review%202010%20NLWS-LLWR-16%20-%20Issue%203.pdf))

The Inspector's attention is drawn to:

*Page 55, 4.6.9 Other Disposal Options*

*3<sup>rd</sup> paragraph*:- "Similarly, Waste Recycling Group has applied for an authorisation to dispose of VLLW at the Lillyhall landfill site in Cumbria."

*Page 60, Table 10, TABLE 10 – MATRIX OF CURRENTLY AUTHORISED ASSETS AND INFRASTRUCTURE IN THE UK AND OVERSEAS* - lists WRG's Lillyhall Site

6. NDA Strategy, NDA, April 2011 [ref: LD180](#)

The Inspector's attention is drawn to:

*Page 15, Integrated Waste Management*

*3<sup>rd</sup> paragraph*: "For LLW, disposal will be in fit for purpose facilities that reflect the nature of the wastes to be managed."

*Page 30, 3.3 Nuclear Materials*

*4<sup>th</sup> paragraph*:- "We will continue to engage with Regulators, UK Government and Devolved Administrations to discuss and test our strategy development and also work closely with the SLCs to achieve fit for purpose, deliverable solutions."

*Page 35, Our Strategy*

*3<sup>rd</sup> paragraph*:- "For LLW, disposal will be in fit for purpose facilities that reflect the nature of the wastes to be managed."

7. The North West of England Plan Regional Spatial Strategy to 2021, Government Office for the North West, September 2008 [ref: RD7](#)

The Inspector's attention is drawn to:

*Page 107, Policy EM 13*

***Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities***

*3<sup>rd</sup> paragraph:- "In considering proposals for waste management facilities (including additional landfill capacity) the ability of existing established sites to meet the needs of the region/sub region should be fully explored."*

*4<sup>th</sup> paragraph:- "The provision of nationally significant waste management facilities may be appropriate where the region offers a particular waste management advantage on a national scale."*

8. Department for Communities and Local Government, March 2012 ([ref: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf](http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf))

The Inspector's attention is drawn to:

*Page 4, paragraph 14:- "At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking."*

*Page 4, paragraph 15:- "Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay."*

9. UK Management of Solid Low Level Radioactive Waste from the Nuclear Industry: the Analysis of Near-term Low Activity Low Level Waste Arisings within the UK Radioactive Waste Inventory 2010, LLWR Ltd./NDA, May 2011 ([ref: http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/Near%20term%20LALLW%20Issue%202\\_Final.pdf](http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/Near%20term%20LALLW%20Issue%202_Final.pdf))

The Inspector's attention is drawn to:

*Page 1, Introduction*

*2<sup>nd</sup> paragraph:- "The total forecast LLW volume is 4.4 million m3 which arises during 2010 to 2120. This consists of 3.3 million m3 of Very Low Level Waste (VLLW) and 1.1 million m3 of LLW."*

10. Joint Waste Management Plans ([ref: http://www.llwrsite.com/national-programme/joint-llw-management-plans](http://www.llwrsite.com/national-programme/joint-llw-management-plans))

*No specific reference is made but we understand that the Joint Waste Management Plans for each waste producer are currently being revised.*

11. Environmental Permitting (England and Wales) Regulations 2010, Decision Document, Disposal of High Volume Very Low Level Radioactive Waste at the Lillyhall Landfill Site, operated by Waste Recycling Limited at Joseph Noble Road, Lillyhall, Workington, Permit Number CD7914 (Effective Date 06/04/2011), Environment Agency, April 2011 [ref: LD197](#)

The Inspector's attention is drawn to:

*The entire content of the Permit.*

12. A Public Consultation on Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom, Defra, DTI and the Devolved Administrations, 28 February 2006 [ref: LD43](#)

*No specific reference is made.*

13. Strategic BPEO Study for Very Low Level Waste, LLWR Ltd., August 2009 ([ref: http://www.llwrsite.com/UserFiles/File/customer-docs/StrategicBPEO/StrategicBPEO-VeryLowLevelWaste-Volume2-August2009.pdf](http://www.llwrsite.com/UserFiles/File/customer-docs/StrategicBPEO/StrategicBPEO-VeryLowLevelWaste-Volume2-August2009.pdf))

The Inspector's attention is drawn to:

*Page 6, Table 1.1 Shortlist of viable options.*

14. Pointers to Good Practice in Communication and Stakeholder engagement in the implementation of Low Level Waste Strategy, 17 November 2009 ([ref: http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/Pointers%20to%20good%20practice,%20LLW%20Strategy%20Group,%2017%20November%2009%20\\_Final\\_.pdf](http://www.llwrsite.com/UserFiles/File/LowLevelWasteStrategyGroup/Pointers%20to%20good%20practice,%20LLW%20Strategy%20Group,%2017%20November%2009%20_Final_.pdf))

The Inspector's attention is drawn to:

***Page 15, Case Study – Stakeholder Engagement supporting the Licensing of the Lillyhall Landfill Site for the Disposal of High Volume Very Low Level Radioactive Waste***

*Pages 15-19 inclusive.*