

PROPOSED SITES WITHIN COPELAND BOROUGH

Household Waste Recycling Centres

None

Waste Treatment and Management Facilities

CO11 Bridge End Industrial Estate, Egremont

Landfill

None

Radioactive Wastes: treatment, management, storage or disposal

CO32 Land adjacent to Sellafield

CO35 Low Level Waste Repository

CO36 Land within Sellafield

Preferred Areas for minerals

None

Areas of Search for minerals

M15 Peel Place Quarry for sand and gravel

Mineral Safeguarding Areas

Limestone

Sandstone

Sand and gravel

Igneous rock

Shallow coal and fireclay

Brick clay

Safeguarding of existing and potential railheads and wharves

M31 Salthouse, Millom (former site of temporary rail loading facility)

CO35 Low Level Waste Repository rail sidings

CO36 Sellafield rail sidings

In the site assessment matrices, the symbols that have been used in assessing the sites against each criterion are:

- ✓ ✓ - the site scores very positively
- ✓ - the site scores positively
- XX – the site scores very negatively
- X – the site scores negatively
- ? – there is too much uncertainty to score the site
- 0 – the site has no impact on this criterion

* main towns = Whitehaven

** Key Service Centres = Cleator Moor, Egremont, Millom

*** safeguarding procedures/zones include those for airfields, Technical Sites, pipelines

CO11 Bridge End Industrial Estate, Egremont

This 2.7ha site is allocated under policy SAP2 for Waste treatment and management facilities.

Considerations

This site is greenfield land of potentially good agricultural quality and its development would extend the built footprint of Egremont slightly.

The original allocation proposed a modern, covered waste facility on this site, primarily as part of the search for sites to treat the county's municipal waste. Copeland Borough Council considered it may be a little too small for a 2 to 3ha facility and preferred the alternative of CO12 Beckermest No1 Pit, which has since become unavailable.

The 2014 Waste Needs Assessment identified a need for at least 7 sites for a range of waste management and treatment facilities across the county, but these would mainly deal with recycling facilities to recover value from commercial and industrial wastes, and many would be at the smaller end of the size range.

There are 30 residential properties within 250m of the approximate centre of the site, but the A595 and an old railway embankment to the east of the site help to provide visual screening. The type of waste facility proposed would be an important consideration in any subsequent planning application. Waste uses are likely to have significant uncovered areas or external storage of waste, which would not be encouraged. Landscape and visual impact assessments, to ascertain adverse impacts on significant receptors, including roads, national cycleways and footpaths, would be necessary. It is not considered that this site would be suitable for an Energy from Waste facility.

The potential of contributing to flood risk on adjacent land, increase in traffic and visual intrusion would need to be considered. However, the site is allocated for employment use and it is not clear that an enclosed waste facility would give rise to impacts markedly different from other non-waste light industrial uses, similar to those generated by other units on the nearby industrial estate.

The site can be accessed from Vale View, but waiting restrictions on Vale View may be needed to ensure unimpeded access to the site. Significant HGV traffic would need to avoid peak traffic flows relating to Sellafield. A Traffic Assessment is likely to be required.

Environmental assets

Florence Mine SSSI is 330m from the site and Haile Great Wood SSSI is 2km; Fish Hatcheries County Wildlife Site (CWS) is 450m and Oxenriggs Pond CWS is 550m; Carleton Moor Wood Ancient Woodland is 1.4km and Great Wood Ancient Woodland, which is also semi-natural woodland UK Priority Habitat, is 2km.

There are otters on the river, badgers and barn owls locally and possible bat roost/feeding.

Although this site is downstream of the River Ehen SAC, the **Habitats Regulations Assessment** will need to assess whether it could have impacts on salmon migration.

National cycle route 72 is adjacent to the site.

Enhancement potential

It could be possible to create new, artificial otter holts and maintain a good habitat for them. The disused railway line along one edge of the site could be retained as a well developed wildlife link, even though the road forms a barrier to the north.

As this is a former railway site, mitigation for industrial archaeology may be required.

If more land is used, there could be some useful habitat creation.

Flood map zone

No identified flood risk

Safeguarding

No safeguarding issues have been identified

Agricultural Land Classification

Grade 3 - greater than 60% likelihood that this is Best and Most Versatile land

Landscape Character Area

Sub-type 5b – low farmland

Sequential approach

A greenfield site, but allocated as employment land, in a Key Service Centre

Summary of comments from previous consultation stages

Not considered suitable because of proximity to housing.

It is too near existing businesses and the A595.

Advice should be sought on archaeological mitigation.

Copeland BC considers it may be a little too small for a 2 to 3ha facility and it is fairly close to houses; CO12 Beckermest No1 Pit is considered a better option.

Existing sewerage/flooding issues in the area, CCC to ensure the development does not exacerbate the issues and/or transfer the problem to another location. United Utilities have an easement in place, which allows for a water main to cross the site.

There could be access difficulties onto the highway network; it is unclear if a suitable access could be secured.

CO11 - Bridge End Industrial Estate, Egremont



WASTE MANAGEMENT SITE SCORING MATRIX

CO11 Bridge End Industrial Estate, Egremont

Site selection criteria	Description/ Characteristic	Comment/explanation/ issues	Score
1. Proximity to waste arisings (by road)	Within 5 miles of the centre of main towns* or Key Service Centres**		✓ ✓
	Within 5-10 miles of the centre of main towns or of Key Service Centres		
	Greater than 10 miles from a town or Key Service Centre		
2. Accessibility	Access to existing rail facilities		
	Access to existing primary road network		✓ ✓
	Potential for rail access		XX
	Access to proposed primary road network		
	Good local road accessibility		
3. Sequential approach	Previously developed land (brownfield)		
	Greenfield		X
	Allocated for waste management or employment use and at a town or Key Service Centre	Allocated in Allerdale Local Plan for employment use	✓ ✓
	Allocated for waste management or employment use but not at a town or Key Service Centre		
4. Deliverability	No owner objection		?
	Owner objection exists		
5. Flood risk	Zone 1 or no flood risk		
	Zone 2		
	Zone 3a		
	Zone 3b (functional floodplain)		
6. Other land uses	Conflict unlikely with other land use		✓ ✓
	Conflict likely with other land use		
7. Co-location potential	Large enough to accommodate more than one facility		
	Not large enough to accommodate more than one facility		X
8. Proximity to housing	No houses within 250 metres		

	Houses within 250 metres	2 Houses are adjacent to the site, but there is a change in ground level due to the dismantled railway; 30 more houses lie within 250m of the centre of the site, but are beyond the A595	X
9. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact	Florence Mine SSSI is 350m from the site, no direct pathways evident.	?
	Indirect adverse (site outside designated area)		
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance		
	No impact	Fish Hatcheries County Wildlife Site (CWS) is 450m from the site, no direct pathways evident	?
	Requires mitigation/compensation measures - indirect adverse (site outside designated area)		
	Requires compensation measures - direct adverse (site within designated area)		
10. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of Outstanding Natural Beauty, Heritage Coasts and National Parks		✓ ✓
	Site likely to adversely impact on nationally designated landscape areas		
11. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs		✓
	Demonstrable adverse impact on inward investment		
12. Safeguarding	Not affecting safeguarding procedures/zones***		✓ ✓
	Conflict with safeguarding procedures/zones		

Relevant MWLP policies:

SP1 Presumption in favour of sustainable development
SP2 Provision for waste
SP3 Waste capacity
SP12 Climate change mitigation and adaptation
SP14 Environmental assets
DC1 Traffic and transport
DC2 General criteria
DC3 Noise
DC6 Cumulative environmental impacts
DC9 Criteria for waste management facilities
DC16 Biodiversity and geodiversity
DC18 Landscape and visual impact
DC19 Flood risk
DC20 The water environment
SAP2 Waste treatment and management facilities

Mitigation/change proposed in Sustainability Appraisal:

The small scale of the site should limit the impacts, and best practice mitigation should be satisfactory, subject to assessment of any eventual development proposal. Specific surveys will be needed for wildlife use of the site, and also drainage requirements to limit impact of runoff on land to the west.

Summary of overall assessment:

This allocation has benefits and drawbacks, but provides an opportunity for the waste needs of the district to be met with minimal waste miles, and has the potential to provide local jobs.

Site Assessment score: ✓ ✓ very positive

CO32 Land adjacent to Sellafield Site

The 50ha site is allocated under policy SAP3 as a site for the treatment, management, storage and/or disposal of radioactive and/or construction and demolition wastes; particular use could be made of the site's potential to release capacity in the vaults at the Low Level Waste Repository (LLWR), by diverting wastes that do not need such a highly engineered facility.

Considerations

The site has been identified from the land owned by the Nuclear Decommissioning Authority (NDA), which has then been refined by consideration of known environmental asset and other constraints. Any development would use only part of the site allocated, dependent on any further constraints identified at the more detailed planning application stage. It is intended that the site would store or dispose of radioactive wastes from decommissioning and demolition of the adjacent Sellafield nuclear licensed site. This might involve development of a new disposal facility, for use once the existing capacity available inside the Sellafield site (the CLESA) was full around 2025. The design of any facility or lay down space, and its location within this large site, has not yet been confirmed. Construction of any facility would be likely to commence towards the end of the Plan period.

Alternatively, the site could be used for temporary (but potentially long term) storage of VLLW that could be used in the cap and restoration at the LLWR. It could also be used to store (again, potentially long term) clean construction and demolition waste from Sellafield, which would then be available for restoration projects within Sellafield. Any other adverse impacts of the development would, therefore, depend on the design, duration of the operational life and its location.

The Sellafield area is underlain by a major aquifer of regional importance, with hydraulic conductivity between the solid and drift deposits, and issues of groundwater migration and protection would need further investigation and mitigation as necessary.

The allocation complies with national policy and with strategic policies in the Plan, prioritising the management of wastes at source or as close as feasible to the source, and minimises the transport of these bulky, but low risk wastes, via the West Cumbria highway network. Its identification reflects the County Council's position, that the potential for managing decommissioning wastes at, or next to, the sites where they arise should be rigorously examined before a more dispersed pattern of sites further away is considered.

As such a high proportion of LLW and VLLW is forecast to arise at Sellafield, the preference has always been for these wastes to be managed within the existing Sellafield complex, which is identified in the site allocation policies as site CO36, but there is uncertainty about whether land can be made available there due to spatial constraints during decommissioning. In January 2013, Sellafield Ltd. produced a feasibility study into the potential suitability for disposal of LLW/VLLW on or near to the Sellafield site. This report states that if a facility is required onsite in the next couple of decades, then an area of sufficient size is not available. However, two areas within adjacent land, site CO32, might be suitable.

The site is very close to the existing complex, and there is no evidence that development would hinder investment in the local area. To the contrary, this allocation would have less potential to hinder investment than alternative disposal locations available (Lillyhall landfill) or previously considered (CO31 Keekle Head).

Environmental assets

Ponsonby Tarn County Wildlife Site (CWS) lies 160m away, Terrace Bank Wood CWS is 470m, Sellafield Tarn CWS is 1.1km and Seascale Dunes & Foreshore CWS is 1.5km. The River Calder Banks Regionally Important Geomorphological Site (RIGS) lies 190m to the north. Calder Bank Wood Ancient Woodland is 470m away. There is an area of semi-natural woodland UK Priority Habitat some 470m to the north and one of fen, marsh and swamp around 130m to the east. The boundary of the Lake District National Park is 920m to the north.

The **Habitats Regulations Assessment** will need to consider whether development could have adverse impacts on salmon migration to the River Ehen SAC. This is relevant even though this site is on the River Calder, not the River Ehen.

The site is 300m from the area of natterjack toad sites potential, though it is unlikely that they will use this site. There are records for brown-eared bats, adders, barn owls and badgers.

A stone circle, which constitutes a Scheduled Monument, is 1.3km away near Seascale How Farm. Calder Farmhouse is the closest Listed Building at 95m.

National cycle route 72 and the Cumbria Coastal Way are approximately 1km away.

Enhancement potential

There is potentially a large area of land, and habitat protection and enhancement measures could be incorporated into a development scheme. Opportunities exist for hedgerows and reptile habitat. Screening of views from the National Park may also be able to be enhanced.

There is potential for prehistoric remains on the site - mitigation could be required.

Flood map zone

No flood risk identified

Safeguarding

The site is outside, but immediately adjacent to the Sellafield nuclear licenced site

Agricultural Land Classification

Grade 3 - greater than 60% likelihood that this is Best and Most Versatile land

Landscape Character Area

Sub-type 5b – low farmland

Sequential approach

Greenfield site, not at a town or Key Service Centre, but immediately adjacent to the nuclear complex

Summary of comments from previous consultations

The possibility of using land at Sellafield for managing other waste streams, not just radioactive wastes, was put forward in the 2005 Issues and Options Discussion Paper consultations. Comments at that time were that there were practical difficulties on siting general waste management facilities within a licenced nuclear site. It was not thought practicable to consider the Sellafield or Windscale sites as potential hosts for waste other than that associated with on-site decommissioning.

The site raised protected species issues, as there are records for badgers, bats and reptiles.

Seascale and other Parish Councils objected to this site.

Other comments received were:-

- the site is within 95 metres of a listed building;
- its development would appear to give rise to no ecological benefits and would result in ecological harm;
- a public right of way runs along the western boundary; the site is close to the boundary of the Lake District National Park;
- it is within the Sellafield safeguarding protection zone, which brings uncertainty about its deliverability;
- it is on a major aquifer;
- the policies are unsound because the evidence base does not make clear how alternatives were ruled out and whether the site is deliverable or environmentally acceptable, also a Sustainability Appraisal of alternative sites has not been undertaken;
- that it is not suitable because of access and it is greenfield;
- that it would bring development very much closer to the listed Calder Farmhouse, the setting of which should be safeguarded and harmful effects mitigated, advice should be sought on archaeological mitigation for prehistoric remains;
- the definition of “near sites” and the proximity principle should not be so prescriptive that it over-rules the synergy and economic benefits of shared storage or disposal facilities where there is a strong economic justification;
- it would be useful if the site appraisal selection criteria could be outlined and it would be useful if the key tenets and assumptions of UK radioactive waste management policy were developed and summarised;
- it would be helpful if a timeline for development and implementation of the preferred sites for LLW and VLLW was produced, noting all the key strategic assumptions;
- the Environment Agency said that solid radioactive waste disposal must be in line with its guidance published in February 2009, the site is on a major aquifer and an Outer Groundwater Source Protection Zone, where a risk assessment would be needed, and the Agency would normally object if this shows that active long term site management is essential to prevent long term groundwater pollution, the Agency would take account of the long term plans for Sellafield site management and the environmental implications of those plans and highlights

the importance of infrastructure in the county for high volume low activity waste disposal to support Sellafield decommissioning;

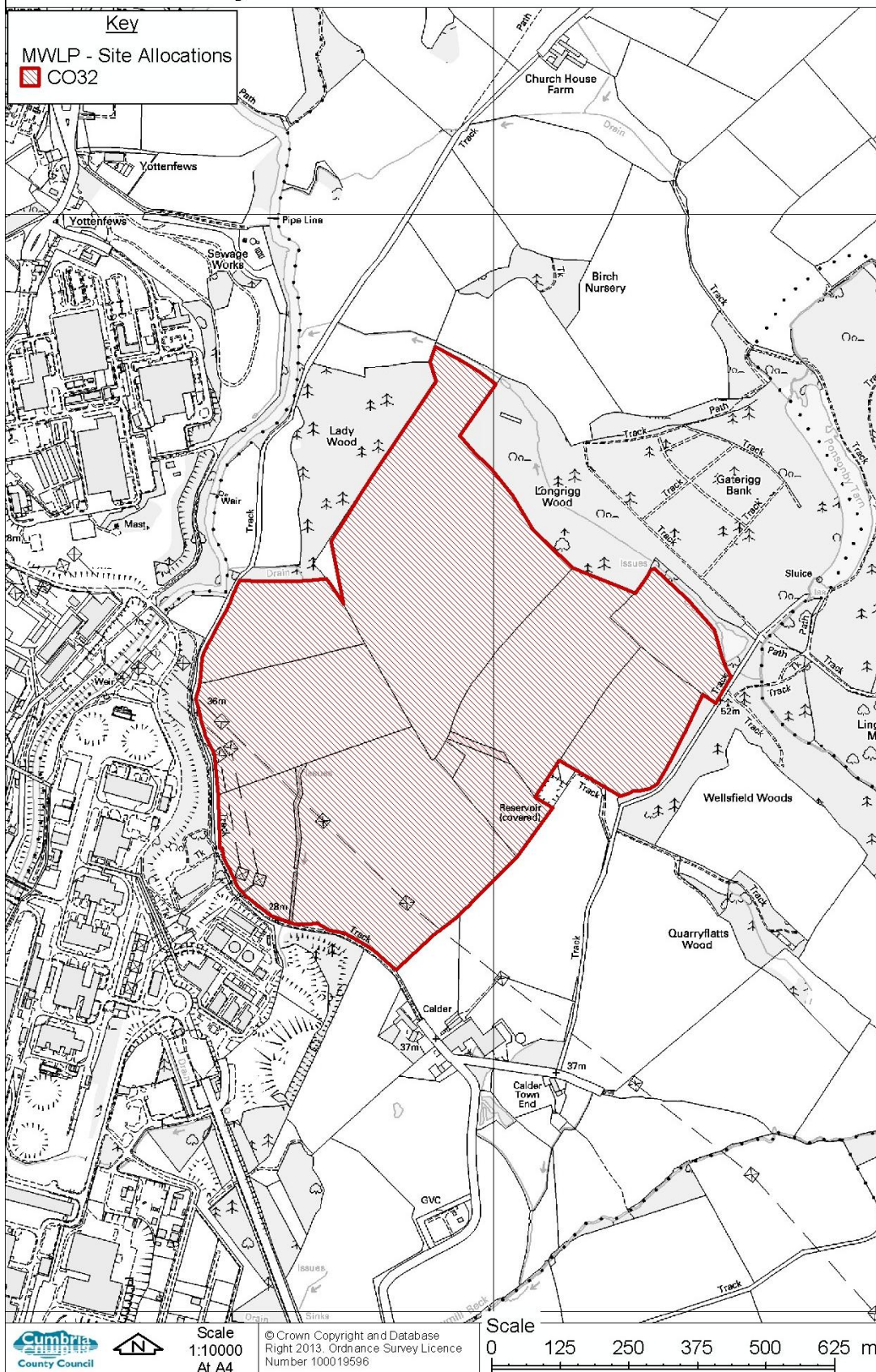
- extreme caution is needed when considering landfill of radioactive wastes to ensure it does not compromise the safety of Cumbrian residents;
- the Nuclear Decommissioning Authority supports the opening of new routes for managing LLW and welcomed the inclusion of a number of prospective sites in earlier consultations and considers the removal of these is counter to the MWDF's aim of maintaining an element of commercial competition, it does not consider that this site should be identified but could wait until the UK Strategy for LLW is finalised, previous view offered was that a more generalised designation of the whole Sellafield site and a wider area may be more appropriate, the current area identified may not be the optimal location for facilities at or adjacent to Sellafield;
- it is surprising that a specific site for VLLW has been identified, it appears contrary to the approach that policies would be amended once greater certainty had been provided through national and regional policies;
- there are other, nearby sites, which are better placed to accept decommissioning wastes, such as Lillyhall landfill;
- the site appears to be constrained for access;
- it is a greenfield site and development would have significant landscape/visual, ecology and environmental control issues;
- there are protected species, issues including badgers, bats and reptiles, along with a diversity of invertebrates;
- a new landfill would be contrary to regional policy, unless it has been demonstrated that existing ones cannot take these wastes;
- other sites, such as Lillyhall, are considered to score better in the site assessment matrices; deliverability is uncertain;
- the potential for sea level rise needs to be considered;
- the site appraisal fails to recognise the River Ehen and River Calder SAC;
- the Sellafield area is underlain by a major aquifer of regional importance with hydraulic conductivity between the solid and drift deposits;
- significant quantities of engineering materials would need to be imported for robust geological barriers;
- there is a water distribution main passing through the site, requiring a 5m wide maintenance strip and no building or level changes in the proximity;
- United Utilities has a service reservoir installation within the site and there is a public right of way that is used to service the apparatus
- concerned about proposal by FCC to bury Sellafield's LLW at Lillyhall landfill; such waste should be stored on the site of arising (CO32, CO35, CO36).

Summary of comments from spring 2015 consultation

There is the potential to disturb archaeological assets, and a desk based assessment should be undertaken prior to submission of a planning application.

Strongly object to allocation of the greenfield site north-east of Sellafield on the basis that it will encourage yet more nuclear sprawl on the Cumbrian plain and will bring industrial development to within 500m of the Lake District National Park boundary. This will cause further landscape damage, and remove pretty much any buffer between Sellafield and the National Park.

CO32 - Land adjacent to Sellafield



WASTE MANAGEMENT SITE SCORING MATRIX

CO32 Land adjacent to Sellafield Site

Site selection criteria	Description/ Characteristic	Comment/explanation/ issues	Score
1. Proximity to waste arisings (by road)	Within 5 miles of the centre of main towns* or Key Service Centres**	The site is very close to the waste arisings, which in this case is the Sellafield site	✓ ✓
	Within 5-10 miles of the centre of main towns or of Key Service Centres		
	Greater than 10 miles from a town or Key Service Centre		
2. Accessibility	Access to existing rail facilities	Access would be through Sellafield site	✓ ✓
	Access to existing primary road network		
	Potential for rail access		
	Access to proposed primary road network	Access would be through Sellafield site	✓ ✓
	Good local road accessibility		
3. Sequential approach	Previously developed land (brownfield)		
	Greenfield		xx
	Allocated for waste management or employment use and at a town or Key Service Centre		
	Allocated for waste management or employment use but not at a town or Key Service Centre		
4. Deliverability	No owner objection	Owned by NDA; assessment undertaken by Sellafield Ltd.	✓ ✓
	Owner objection exists		
5. Flood risk	Zone 1 or no flood risk		✓ ✓
	Zone 2		
	Zone 3a		
	Zone 3b (functional floodplain)		
6. Other land uses	Conflict unlikely with other land use	The site is 50 ha of which a reduced area would be used; potential conflicts would depend on where within the site the facility was placed	✓
	Conflict likely with other land use		
7. Co-location potential	Large enough to accommodate more than one facility	No wish/need for more than one facility - but site is very large and in effect co-located with Sellafield	✓ ✓

	Not large enough to accommodate more than one facility		
8. Proximity to housing	No houses within 250 metres		
	Houses within 250 metres	Yes – one property	x
9. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact		
	Indirect adverse (site outside designated area)	HRA will assess potential impacts on salmon migration in River Ehen	?
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance		
	No impact		✓
	Requires mitigation/compensation measures - indirect adverse (site outside designated area)		
	Requires compensation measures - direct adverse (site within designated area)		
10. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of Outstanding Natural Beauty, Heritage Coasts and National Parks		
	Site likely to adversely impact on nationally designated landscape areas	Landscape and visual impacts, temporary and permanent, on LDNPA would need to be investigated	?
11. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs	Avoids proliferation and dispersal of LLW in West Cumbria	✓ ✓
	Demonstrable adverse impact on inward investment		
12. Safeguarding	Not affecting safeguarding procedures/zones***	it is in the Sellafield DPZ, but it is assumed that this would be expanded if any development took place within the allocated site	✓ ✓
	Conflict with safeguarding procedures/zones		

Relevant MWLP policies:

SP1 Presumption in favour of sustainable development
SP4 Use of Best Available Technique
SP5 Development criteria for low level radioactive wastes
SP12 Climate change mitigation and adaptation
SP13 Economic benefit
SP14 Environmental assets
DC6 Cumulative environmental impacts
DC16 Biodiversity and geodiversity
DC17 Historic environment
DC18 Landscape and visual impact
DC20 The water environment
DC22 Restoration and afteruse
SAP3 Low Level radioactive Wastes (LLW) treatment, management, storage and disposal

Mitigation/change proposed in Sustainability Appraisal:

The nature of the facility is unclear; if it requires an earth-bunded landform (and subsequent earth-capping during restoration) measures to prevent movement of water away from the feature and other stored materials being carried or blown off the site, will be necessary. Specific measures would be needed during construction to prevent dust and other material being blown onto adjacent agricultural land. The likely low elevation of the facility and containment using bunds is likely to be sufficient to mitigate the principal visual impacts. Further consideration would also need to be given to the impact on protected species and the scope for habitat compensation if part or the entire site is developed.

Summary of overall assessment:

There are strong positive aspects to this assessment, and the questions remaining would be addressed prior to a planning application when the size, location, design and restoration scheme for the facility were known. The proposal is not as supportable as CO36, which would confine development within the curtilage of the existing complex, and should only be considered further if that is unrealistic.

Site Assessment score: ✓ ✓ positive

CO35 Low Level Waste Repository, near Drigg

The site is allocated under policy SAP3 as a site for the treatment, management, storage and/or disposal of radioactive wastes. The allocation of the site also relates to safeguarding the Low Level Waste Repository rail spur within the site from inappropriate development that would adversely affect any existing or potential use for sustainable transport of waste or minerals.

Considerations

This site is identified for fulfilling a continuing role as a component of the UK's national Low Level radioactive Waste (LLW) management capabilities. The completed Vault 9 has capacity for storing around 100,000 cubic metres of LLW. It is important that this highly engineered facility is reserved for wastes that require that standard of containment. Decisions about which wastes require the LLW Repository's (LLWR) standard of engineered containment, is a matter for the other Regulators (Environment Agency and Office for Nuclear Regulation). A joint assessment of the realistic capacity of the LLWR has been requested.

Due to access issues through the village of Drigg, recent planning permissions have required full use to be made of rail transport to/from the Repository. A future planning application for 1 million cubic metres of disposal capacity, and for a permanent cap over the facilities, is currently being determined by the County Council.

The principal reason in favour of safeguarding this site is to concentrate management capacity on an existing site rather than exposing other localities to similar issues, recognising that even if the facility closes in 2018, when its current planning permission expires, it will continue to store these materials indefinitely and any perceived impacts from proximity to the site will persist regardless.

Environmental assets

The western site boundary is adjacent to the Cumbria Coast Marine Conservation Zone, the Drigg Coast SAC, Drigg Coast SSSI and three areas of UK Priority Habitat - coastal habitats above high water; heathland; and fen, marsh & swamp. The southern site boundary is adjacent to an area of coastal and floodplain grazing marsh UK Priority Habitat. The northern boundary is adjacent to Seascale County Wildlife Site. The Lake District National Park boundary lies 270m away. Drigg Holme SSSI, Hallsenna Moor SSSI and Hallsenna Moor National Nature Reserve all lie around 1km away. The closest Local Geological Site (LGS, formerly Regionally Important Geomorphological Site) is at Seascale Beach, approximately 1.9km distance.

The **Habitats Regulations Assessment** will need to consider potential impacts on the Drigg Coast SAC, and use of similar mitigation measures to those already adopted for developments at the Repository.

Enhancement potential

The site falls within the natterjack toad sites potential zone. It is also adjacent to the Drigg Dunes and Coast Site of Invertebrate Significance. There are records of brown hares, otters, barn owls and Small Pearl-bordered Fritillary butterflies in the vicinity; whilst records show that adders, great crested newts, slow worms, viviparous lizards

and badgers have been found on the site. There is potentially a large area of land for which habitat protection and enhancement measures could be incorporated into a development scheme. Screening of views from the National Park may also be able to be enhanced. The site's Landscape and Wildlife Management Scheme is regularly updated as a planning permission requirement.

Flood map zone

Flood zones 2 and 3 affect a small part of the site at the southern boundary

Safeguarding

No safeguarding issues were identified

Agricultural Land Classification

Grade 6 - non-agricultural

Landscape Character Area

Sub-type 5b – low farmland

Sequential approach

Greenfield areas within an existing industrial complex/brown field site

Summary of comments from the previous consultation stages

All the necessary research has not been done or is not conclusive as to safety, best practice, etc.

There is disagreement with the lack of clarification as to the elements of the waste stream that would be considered appropriate to be managed at this site; the UK strategy seeks to identify alternative options and to preserve the LLWR's capacity; constituent parts of the bottom end of LLW can be adequately diverted to an alternative facility.

It is questioned whether other parts of the north west have made provision for their own LLW and VLLW.

The definition of “near sites” and the proximity principle should not be so prescriptive that it over-rules the synergy and economic benefits of shared storage or disposal facilities, where there is a strong economic justification; it would be useful if the site appraisal selection criteria could be outlined; it would be useful if the key tenets and assumptions of UK radioactive waste management policy were developed and summarised; and it would be helpful if a timeline for development and implementation of the preferred sites for LLW and VLLW was produced, noting all the key strategic assumptions.

The inclusion of this site without a detailed assessment of feasibility and deliverability is questioned.



WASTE MANAGEMENT SITE SCORING MATRIX

CO35 Low Level Waste Repository, near Drigg

Site selection criteria	Description/Characteristic	Comment/explanation/issues	Score
1. Proximity to waste arisings (by road)	Within 5 miles of the centre of main towns* or Key Service Centres**	National facility, but also within 5 miles of the main source of LLW decommissioning waste	✓ ✓
	Within 5-10 miles of the centre of main towns or of Key Service Centres		
	Greater than 10 miles from a town or Key Service Centre		
2. Accessibility	Access to existing rail facilities	Close to Sellafield and with rail access via own rail spur	✓ ✓
	Access to existing primary road network	Access to A595 via B5344, traffic calmed through Drigg village	x
	Potential for rail access		
	Access to proposed primary road network		
	Good local road accessibility		
3. Sequential approach	Previously developed land (brownfield)	Part of the site was a World War II ordnance factory	✓
	Greenfield	Location on greenfield areas within CO35 would score less well	x
	Allocated for waste management or employment use and at a town or Key Service Centre		
	Allocated for waste management or employment use but not at a town or Key Service Centre	Within an existing LLW site	✓
4. Deliverability	No owner objection	Owned by NDA, operated by LLWR Ltd.	✓ ✓
	Owner objection exists		
5. Flood risk	Zone 1 or no flood risk		
	Zone 2		
	Zone 3a	Flood zones 2 and 3 affect a small part of the site at the southern boundary, but this could be avoided	?
	Zone 3b (functional floodplain)		
6. Other land uses	Conflict unlikely with other land use	Within existing site	?
	Conflict likely with other land use		

7. Co-location potential	Large enough to accommodate more than one facility		✓ ✓
	Not large enough to accommodate more than one facility		
8. Proximity to housing	No houses within 250 metres		
	Houses within 250 metres	Yes, 69 properties mostly within Drigg village	xx
9. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact		
	Indirect adverse (site outside designated area)	Impacts on the Drigg Coast SAC to be investigated	?
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance	Enhancement of Seascale CWS possible	✓
	No impact		
	Requires mitigation/compensation measures - indirect adverse (site outside designated area)	Impacts on locally designated sites to be investigated	?
	Requires compensation measures - direct adverse (site within designated area)		
10. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of Outstanding Natural Beauty, Heritage Coasts and National Parks		
	Site likely to adversely impact on nationally designated landscape areas	Within existing site – but potential for increased impacts	x
11. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs	Avoids proliferation and dispersal of LLW in West Cumbria	✓ ✓
	Demonstrable adverse impact on inward investment		
12. Safeguarding	Not affecting safeguarding procedures/zones***		✓ ✓
	Conflict with safeguarding procedures/zones		

Relevant MWLP policies:

SP1 Presumption in favour of sustainable development
SP4 Use of Best Available Technique
SP5 Development criteria for low level radioactive wastes
SP12 Climate change mitigation and adaptation
SP13 Economic benefit
SP14 Environmental assets
DC6 Cumulative environmental impacts
DC16 Biodiversity and geodiversity
DC17 Historic environment
DC18 Landscape and visual impact
DC20 The water environment
DC22 Restoration and afteruse
SAP3 Low Level radioactive Wastes (LLW) treatment, management, storage and disposal

Mitigation/change proposed in Sustainability Appraisal:

Given the nature of the existing activity on the site, it is reasonable to expect existing mitigation measures are of the highest technical specification and rigidly enforced. Nevertheless, it would be prudent to review their effectiveness and the possible need for additional facilities when evaluating any proposal to continue accepting LLW at this site. Further clarification is needed of the risks to the SAC and appropriate mitigation that may be required.

Summary of overall assessment:

The principal reason in favour of safeguarding this site is to concentrate management capacity on an existing site rather than exposing other localities to similar issues, recognising that even if the facility closes in 2018, the stored wastes will need to be relocated elsewhere. The proposal is not as supportable as CO36, which would confine development within the curtilage of the existing Sellafield complex.

Site Assessment score: ✓ positive

CO36 Sellafield Site

The site is allocated under policy SAP3 as a site for the treatment, management, storage and/or disposal of radioactive wastes. The allocation also relates to safeguarding the Sellafield site rail spur from inappropriate development, which would adversely affect any existing or potential use for sustainable transport of waste or minerals.

Considerations

This is an existing civil nuclear licensed site, which is mostly operational and partly being decommissioned. There is an approved landfill within the site (CLESA), which has remaining capacity for certain of Sellafield's own Lower Activity Low Level Wastes (LA-LLW). More than half of all of the LLW that is consigned to the Low Level Waste Repository (LLWR) near Drigg is from Sellafield.

In January 2013, Sellafield Ltd. produced a feasibility study into the potential suitability for disposal of LLW/VLLW on or near to the Sellafield site. This report states that if a facility is required onsite in the next couple of decades, then an area of sufficient size is not available. However, two areas within adjacent land, site allocation CO32, might be suitable.

At planning application stage, a rigorous assessment of at least the following, will be required: whether there would be sufficient space within the complex for management facilities; suitability of the underlying geology and hydrogeology; flexibility of policy; deliverability of project; proximity to waste arisings; environmental and ecological impacts; sustainable development; impacts of climate change and sea level rise; impact on nearby dwellings and Listed Buildings.

Environmental assets

The site is adjacent to the Cumbria Coast Marine Conservation Zone and lies 2.7km from the Drigg Coast SAC and 8.4km downstream from the River Ehen SAC. Seascale Dunes & Foreshore County Wildlife Site (CWS) is adjacent to the southern boundary; Sellafield Tarn CWS is adjacent to the western boundary; Terrace Bank Wood CWS, which is also UK Priority Habitat semi-natural woodland, lies 320m away; Starling Castle CWS is 840m; Ponsonby Tarn CWS is 1km; Gaitskell Wood CWS is 1.2km; Calder Bridge CWS is 1.3km; Brownbank Moss CWS is 1.4km; and Braystones Coast CWS is 2km away. River Calder Banks Regionally Important Geomorphological Site (RIGS) abuts the north east corner of the site, Seascale Beach RIGS is 980m away, whilst Newton Sand Pit, Gosforth RIGS lies 1.6km away. Low Church Moss SSSI lies 1.1km away. There is an area of UK Priority Habitat coastal & floodplain grazing marsh 720m away, and one of fen, marsh & swamp around 1km away. There are two areas of ancient woodland near the site - Calder Bank Wood is 340m away and Priorling Wood is 1.3km.

The **Habitats Regulations Assessment** will need to consider whether development on the site could impact on the River Ehen SAC, in particular on salmon migration. This is relevant even though this site is downstream of the SAC.

Sellafield includes part of the Sellafield Natterjack Toad site along its western boundary, plus the natterjack potential area covers the southern half of the site.

Enhancement potential

There is potential for habitat creation/enhancement in the long term. Apart from natterjack records, there have also been records of brown long-eared bats, brown hares, common toads, adders, Dingy Skippers and the Small Pearl-bordered Fritillary on and in the vicinity of the site. There are also opportunities for hedgerows and reptile habitat.

Flood map zone

The River Calder flows through the site which is in zones 2 and 3

Safeguarding

The site is within the Sellafield Site HSE consultation zone

Agricultural Land Classification

Urban

Landscape Character Area

Urban

Sequential approach

Existing operational complex

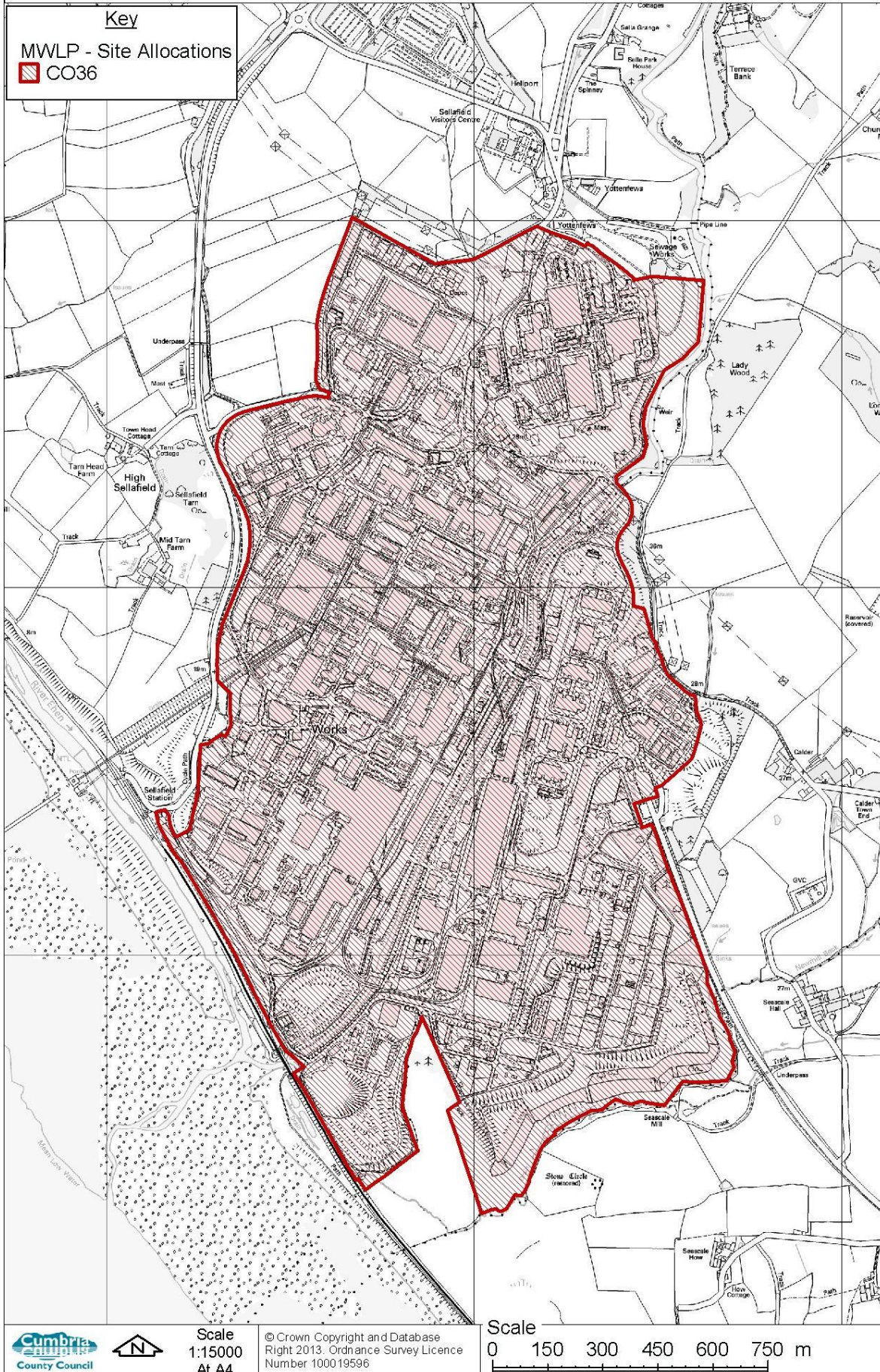
Summary of comments from previous consultation stages

The methodology for identifying this site was questioned, as was the adequacy of comparing the suitability of this site against others. There has not been a detailed assessment of the feasibility of identifying land within the Sellafield site.

Site CO36 is located in close proximity to National Grid's high pressure underground gas transmission pipelines. National Grid require that no permanent structures are built over or under pipelines, or within the zone specified in the agreements, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of National Grid's pipeline(s) must be maintained at all times. The County Council is directed to National Grid's guidance on their website.

Deliverability of proposals within the site are questioned.

CO36 - Land within Sellafield



WASTE MANAGEMENT SITE SCORING MATRIX

CO36 Sellafield Site

Site selection criteria	Description/ Characteristic	Comment/explanation/ issues	Score
1. Proximity to waste arisings (by road)	Within 5 miles of the centre of main towns* or Key Service Centres**	The site is located at the waste arisings, which in this case is the Sellafield site	✓ ✓
	Within 5-10 miles of the centre of main towns or of Key Service Centres		
	Greater than 10 miles from a town or Key Service Centre		
2. Accessibility	Access to existing rail facilities	Not required for waste transfer, but could be used for construction materials	✓ ✓
	Access to existing primary road network	Not required for the proposed waste use, but good access to the A595	✓
	Potential for rail access		
	Access to proposed primary road network		
	Good local road accessibility		
3. Sequential approach	Previously developed land (brownfield)		✓ ✓
	Greenfield		
	Allocated for waste management or employment use and at a town or Key Service Centre	Not allocated, but in an existing complex where the waste arises	✓
	Allocated for waste management or employment use but not at a town or Key Service Centre		
4. Deliverability	No owner objection	Owned by NDA; assessment undertaken by Sellafield Ltd.	✓ ✓
	Owner objection exists		
5. Flood risk	Zone 1 or no flood risk		
	Zone 2		
	Zone 3a	River Calder runs through the site and its flood risk is managed successfully	✓
	Zone 3b (functional floodplain)		
6. Other land uses	Conflict unlikely with other land use	Requires management of space within the site as buildings are decommissioned or contaminated land identified	?
	Conflict likely with other land use		
7. Co-location potential	Large enough to accommodate more than one facility	No wish/need for more than one facility - co-located within Sellafield	✓ ✓

	Not large enough to accommodate more than one facility		
8. Proximity to housing	No houses within 250 metres		
	Houses within 250 metres	There are approximately 30 residential properties within 250m	xx
9. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact		
	Indirect adverse (site outside designated area)	Half the site falls within area of natterjack toad potential	x
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance		
	No impact		
	Requires mitigation/compensation measures - indirect adverse (site outside designated area)	There are 9 County Wildlife Sites in the area, two of which are adjacent to the site	x
	Requires compensation measures - direct adverse (site within designated area)		
10. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of Outstanding Natural Beauty, Heritage Coasts and National Parks		
	Site likely to adversely impact on nationally designated landscape areas	Site is 1.2km from the Lake District National Park boundary, but proposal linked to decommissioning, and limits development within existing boundary	?
11. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs	Avoids proliferation and dispersal of LLW in West Cumbria	✓ ✓
	Demonstrable adverse impact on inward investment		
12. Safeguarding	Not affecting safeguarding procedures/zones***		
	Conflict with safeguarding procedures/zones	The site is within the Sellafield Site HSE consultation zone	/

Relevant MWLP policies:

SP1 Presumption in favour of sustainable development
SP4 Use of Best Available Technique
SP5 Development criteria for low level radioactive wastes
SP12 Climate change mitigation and adaptation
SP13 Economic benefit
SP14 Environmental assets
DC6 Cumulative environmental impacts
DC16 Biodiversity and geodiversity
DC17 Historic environment
DC18 Landscape and visual impact
DC20 The water environment
DC22 Restoration and afteruse
SAP3 Low Level radioactive Wastes (LLW) treatment, management, storage and disposal

Mitigation/change proposed in Sustainability Appraisal

Any facility would need to be mitigated by using measures at least as effective as those already in place. Further consideration needs to be given to preventing any contamination of land and water environments by material stored in an engineered landform, which is expected to be the nature of the facility that is developed. Location should be prioritised towards areas of the site that have been cleared, but which are not in use at present. Development on wooded land along the eastern border, and the plot just north of the mouth of the River Calder, should be avoided to protect biodiversity assets. Open “greenfield” plots on the north side of the site would need to be assessed for use by protected species.

Mitigation in respect of safeguarding allocation:

None, other than continuing use of any measures currently applied.

Summary of overall assessment:

This is a very sustainable allocation proposal with strong positive aspects, as it would result in wastes being managed at source. No road or rail would be needed to transport wastes to the LLWR, and nuclear waste development would be confined within the existing complex, limiting the likelihood of generating incremental impacts and preventing the extension of risks and impacts to new locations. The principal potential adverse impacts would be on habitats supporting protected species within the site (though there is a risk to species passing up the River Calder) and the need to ensure the integrity of storage areas.

Site Assessment score: ✓ ✓ positive

M15 Peel Place Quarry, Holmrook

Land adjacent to the existing quarry is identified as an Area of Search for sand and gravel extraction.

Considerations

The existing Peel Place Quarry is the only sand and gravel quarry in this part of the county; others are at least 65km away. Its extension would need to be justified by the level of reserves and environmental mitigation. All impacts would be considered if a planning application is submitted.

The site lies on the National Park boundary and is overlooked by the Park's higher terrain. Mutual co-operation with the Lake District National Park Authority would ensure that there is minimal impact on the setting of the Park.

Environmental assets

Peel Place Sand and Gravel Pit Local Geological Site (LGS, formerly Regionally Important Geomorphological Site) is within the existing quarry; Hallsenna Moor SSSI, which is also a National Nature Reserve and fen, marsh and swamp UK Priority Habitat, and Addyhouse Ancient Woodland, which is also semi-natural woodland UK Priority Habitat, both lie 500m away; Silver How Bog County Wildlife Site (CWS) is 540m; Bleawath Bog CWS is 920m; Brownbank Moss CWS and Panope Bog CWS are 1km away; Bogholes Wood CWS and Holmrook Hall Wood CWS, which is also Ancient Woodland, are 1.3km; and Gaitskill Wood CWS is 1.5km away.

The Habitats Regulations Assessment will have to consider whether this site would be likely to affect the integrity of the Drigg Coast SAC.

The site is adjacent to the Lake District National Park boundary.

The original Phase 1 habitat survey shows primarily improved grassland with small areas of marshy grassland in the southern corner to the west of High House Farm, and just outside the marked boundary at Crossleys. There are records in the vicinity for brown hare, common pipistrelle, otter, common toad, red squirrel, barn owl, great crested newts and badger.

The closest Listed Building is Hallsenna and stables complex, 330m away.

A bridleway is adjacent to the southern boundary of the site.

Enhancement potential

Potential for habitat enhancements/creation in a restoration scheme. Significant opportunities for enhancement through wetlands, hedgerows, small woodlands and species-rich grassland. Strengthening links with adjacent habitat should be considered. Enhancement is particularly recommended for brown hares, common pipistrelle, otters, red squirrels, barn owls, amphibians and reptiles, though natterjack toads are unlikely to be present on the site.

The other prime feature on the site is the double hedged lane, known as Squeeze Guts Lane. Restoration should re-establish this and other features on the site, including the need to protect landscape quality, distinctiveness and character.

Restoration of the site could also include the development of a woodland area/nature reserve for public access/enjoyment.

There are archaeological remains in the vicinity, so some mitigation measures may be required.

Flood map zone

No flood risk identified

Safeguarding

No safeguarding issues identified

Agricultural Land Classification

Grade 3 - 20 to 60 % likelihood that this is Best and Most Versatile land

Landscape Character Area

Sub-type 5b low farmland

Sequential approach

Greenfield site, but adjacent to existing quarry operation

Summary of comments from previous consultation stages

The majority of comments regarded impacts on Hallsenna; potential harm to nearby wildlife interests; concern over loss of farmland; and a worry that the nearby National Park would look down on the site and there would be harm to the landscape.

This is a greenfield site. All impacts on wetland features should be avoided. Squeeze Guts Lane is notable for its double line of hedges and this may be an important wildlife link.

Advice should be sought on archaeological mitigation and the impact on the setting of Hallsenna Listed Building should be assessed and mitigated.

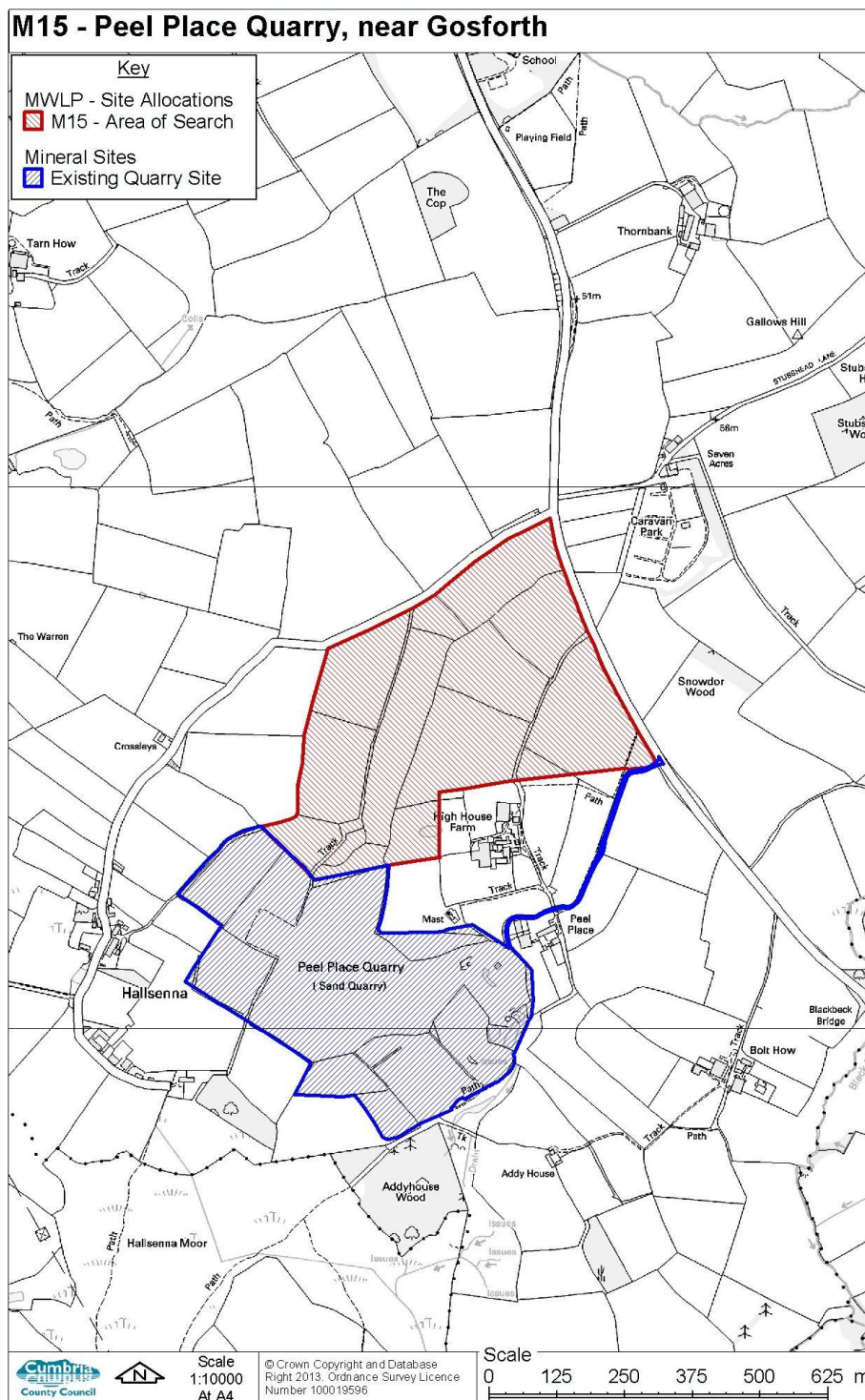
Appropriate landscaping/mitigation works would be needed for nearby properties and the A595, as well as normal development control requirements.

Area of Search M15 should be re-categorised as a Preferred Area - due to the location of the site, the local market and significance in supply to Seascale extensions, the loss of this site would be significant.

Summary of comments from spring 2015 consultation

Peel Place Quarry is immediately adjacent to the National Park boundary; there may be issues relating to the potential of landscape and visual impact should planning permission for mineral extraction be granted.

Strongly object to the extension of this quarry on the basis that it will extend right up to the boundary of the Lake District National Park. The site will have significant landscape and visual impacts.



MINERALS SITE SCORING MATRIX

M15 Peel Place Quarry, Holmrook

Site selection criteria	Description/ Characteristic	Comment/explanation/issues	Score
1. Accessibility	Access to existing rail facilities		
	Access to existing primary road network	via existing quarry access road to A595	✓ ✓
	Potential for rail access		xx
	Access to proposed primary road network		
	Good local road accessibility		
2. Sequential approach	Existing quarry operations		
	Mothballed or dormant site		
	Greenfield	Greenfield – but adjacent to existing quarry	xx
3. Deliverability	No owner objection	put forward by operator	✓ ✓
	Owner objection exists		
4. Flood risk	Zone 1 or no flood risk		✓ ✓
	Zone 2		
	Zone 3a		
	Zone 3b (functional floodplain)		
5. Other land uses	Conflict unlikely with other land use		
	Conflict likely with other land use	Objections from local residents – mitigation will need to be considered	?
6. Proximity to housing	No houses within 250 metres		
	Houses within 250 metres	5 residential properties within 250 m of site	xx
7. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact	Hallsenna SSSI and UK Priority habitat (semi natural woodland) 500m away	✓
	Indirect adverse (site outside designated area)		
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance	Within potential water vole and great crested newt areas. Restoration scheme could offer opportunities	✓
	No impact		
	Requires mitigation/ compensation measures - indirect adverse (site outside designated area)		
	Requires compensation measures - direct adverse (site within designated area)		
8. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of		

	Outstanding Natural Beauty, Heritage Coasts and National Parks		
	Site likely to adversely impact on nationally designated landscape areas	Site fronts on to the Lake District National Park boundary – impacts dependent on mitigation achievable	x
9. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs	Aggregates supplied would support future major infrastructure projects. Jobs at the quarry would be safeguarded	✓ ✓
	Demonstrable adverse impact on inward investment		
10. Safeguarding	Not affecting safeguarding procedures/zones***		✓ ✓
	Conflict with safeguarding procedures/zones		
Relevant MWLP policies: SP1 Presumption in favour of sustainable development SP7 Minerals provision and safeguarding SP12 Climate change mitigation and adaptation SP13 Economic benefit SP14 Environmental assets SP15 Restoration and afteruse SP16 Section 106 planning obligations DC1 Traffic and transport DC2 General criteria DC3 Noise DC4 Quarry blasting DC5 Dust DC6 Cumulative environmental impacts DC12 Criteria for non-energy minerals development DC16 Biodiversity and geodiversity DC17 Historic environment DC18 Landscape and visual DC22 Restoration and afteruse SAP4 Areas for minerals			
Mitigation/change proposed in Sustainability Appraisal: Impacts on surrounding and more distant sensitive receptors will require standard mitigation measures including: bunding, buffering and vegetational screening to limit visual, noise and some dust impacts; wheel washing and dust dampening of open areas during dry periods; restricting the height of any structures on the site to a single storey to limit visual impact; noise suppression on equipment; possible use of conveyors to move material around the site to reduce vehicle noise and emissions. It is assumed that the existing workings use the road linking Hallsenna to the A595 for access and that this will continue to be used in conjunction with any conditions restricting the times of day, number and routeing of movements to and from the site. In principal, this should not result in a worsening of impacts compared to those generated by the existing workings. Finally, it may be prudent to require phased working of the site so that the whole area is not exposed or excavated at the same time, in order to limit the visual impact (particularly from the National Park) but provided this is logistically practicable.			
Summary of overall assessment: This extension of the existing quarry would provide an important aggregates source in the south west of the county, throughout and beyond the Plan period. Potential adverse impacts include those on local residents from continued working in the vicinity, and visual and landscape on the National Park. Site Assessment score: ✓ positive			

M31 Rail sidings, Salthouse Road, Millom

This site was previously a temporary night-time rail loading facility for M17 Ghyll Scaur Quarry. It has now been restored, but is safeguarded under Policy SAP5 as a potential railhead, should it be required again in the future, especially in connection with Britain's Energy Coast projects.

Considerations

The allocation relates to safeguarding the site from inappropriate development, which would adversely affect any future temporary or permanent use for sustainable transport of waste or minerals.

In order to transport mineral from the quarry to the rail sidings access, some works to the A5093 may be needed, but this site allocation refers only to the area shown in the plan.

The nearest property is 415m from the loading area and noise is a consideration. Complaints about waiting trains during the night-time operations were received initially, and should be addressed at the time of any planning application to reinstate the facility.

Environmental assets

The site lies within coastal & floodplain grazing marsh UK Priority Habitat; it is adjacent to Millom Marsh County Wildlife Site (on the other side of the railway); Morecambe Bay SAC, Duddon Estuary SPA, Ramsar and SSSI all lie 300m away; it is within the Duddon Estuary and Duddon Mosses SSSI consultation area; Millom Ironworks Local Nature Reserve is 850m away; Butts Foot Wood CWS, which is also semi-natural woodland UK Priority Habitat, is 1km; Beck Wood Ancient Woodland, Waterbean Hill & Quarry Regionally Important Geomorphological Site (RIGS) and Ghyll Scaur RIGS are all 1.2km away; and Cragfield Wood Ancient Woodland is 1.4km.

The site is within the natterjack potential zone. There are records in the vicinity for badgers, common pipistrelle and noctule bats, hedgehogs and barn owls.

The **Habitats Regulations Assessment** will need to consider whether safeguarding this site would have impacts on the Morecambe Bay SAC and Duddon Estuary SPA/Ramsar.

The closest Listed Buildings are the gate piers to Millom Castle, at 160m distance; the closest Scheduled Monument is Millom Castle, also 160m; and Millom Conservation Area is 960m away.

National Cycle Route 72 runs across the eastern boundary of the site.

Enhancement potential

Potential for habitat enhancements/creation.

Flood map zone

The eastern end of the site and the adjacent railway lie in flood zones 2 and 3

Safeguarding

No safeguarding issues identified

Agricultural Land Classification

Grade 3 - 20 to 60% likelihood that this is Best and Most Versatile land

Landscape Character Area

Sub-type 2d – coastal urban fringe

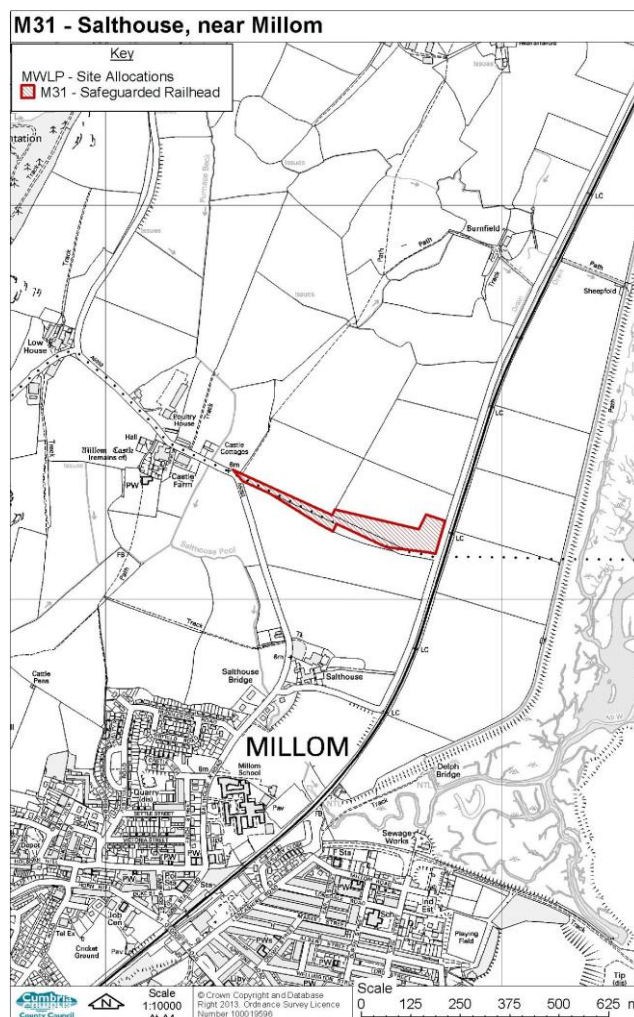
Sequential approach

Greenfield with existing temporary operations

Summary of comments from previous consultation stages

The use of rail transport should be maximised, noise and light pollution minimised. Environmental considerations should be paramount.

The site is close to Millom Castle Scheduled Monument (SAM), it is not clear how the level of activity would change if the rail head became permanent; therefore, the impact on the SAM should be assessed and harm mitigated.



MINERALS SITE SCORING MATRIX

M31 Rail sidings, Salthouse Road, Millom

Site selection criteria	Description/ Characteristic	Comment/explanation/issues	Score
1. Accessibility	Access to existing rail facilities	previously had temporary permission to load trains at night	✓
	Access to existing primary road network	A5093 would be used to transport loads from quarry to railway; road improvements may be needed, or alternative of a conveyor	✓
	Potential for rail access		
	Access to proposed primary road network		
	Good local road accessibility		
2. Sequential approach	Existing quarry operations		
	Mothballed or dormant site		
	Greenfield	Greenfield with previous temporary operations	x
3. Deliverability	No owner objection		✓ ✓
	Owner objection exists		
4. Flood risk	Zone 1 or no flood risk		
	Zone 2		
	Zone 3a	But water compatible development	x
	Zone 3b (functional floodplain)		
5. Other land uses	Conflict unlikely with other land use		✓
	Conflict likely with other land use		
6. Proximity to housing	No houses within 250 metres		
	Houses within 250 metres	6 residential properties within 250m of the site, but none within 250m of the loading area	x
7. Environmental assets	European/national sites, species or habitats		
	Potential to enhance		
	No impact		
	Indirect adverse (site outside designated area)	HRA to consider impacts on Morecambe Bay SAC, Duddon Estuary SPA, Ramsar and SSSI	?
	Direct adverse (site within designated area)		
	Local sites or priority species/habitats		
	Potential to enhance		
	No impact		
	Requires mitigation/compensation measures - indirect adverse (site outside designated area)	Site adjacent to Millom Marsh County Wildlife Site, and the A5093 that would be used for access, runs 45m from Millom Castle Scheduled Monument	?

	Requires compensation measures - direct adverse (site within designated area)		
8. Visual and landscape impact	Site not likely to impact on nationally designated landscape areas – Areas of Outstanding Natural Beauty, Heritage Coasts and National Parks		✓ ✓
	Site likely to adversely impact on nationally designated landscape areas		
9. Economic potential	Likely to be part of or aid regeneration and/or safeguard jobs	Could safeguard jobs at Ghyll Scaur Quarry or may generate new jobs if used for major infrastructure projects elsewhere in West Cumbria	✓ ✓
	Demonstrable adverse impact on inward investment		
10. Safeguarding	Not affecting safeguarding procedures/zones***		✓ ✓
	Conflict with safeguarding procedures/zones		
Relevant MWLP policies: SP1 Presumption in favour of sustainable development SP7 Minerals provision and safeguarding SP8 Strategic areas for new mineral developments SP12 Climate change mitigation and adaptation SP13 Economic benefit SP14 Environmental assets DC1 Traffic and transport DC14 Review of Mineral Permissions DC15 Minerals safeguarding DC16 Biodiversity and geodiversity DC17 Historic environment SAP5 Safeguarding of existing and potential railheads and wharves			
Mitigation/change proposed in Sustainability Appraisal: Should the rail loading facility be reinstated, there is the potential to use a conveyor belt to move material down from the quarry to the loading site; this would appear to offer scope to substantially reduce any impacts along the route, provided permission can be obtained from landowners to allow this infrastructure to be used. Regular rail use of the line means that trains cannot be loaded during the day. If the site is reinstated, then it will require further investigation of noise mitigation measures.			
Summary of overall assessment: The proposal would safeguard the potential for a loading facility to be reinstated. While the infrastructure is beneficial in allowing non-road movement of a nationally important aggregate, it would have potentially significant adverse impacts on a small number of properties along the route linking the quarry to the railway line; consideration of conveyor use would be beneficial. Previous use of the site initially generated complaints about noise; this was primarily from night-time loading of trains. Site Assessment score: ✓ ✓ very positive			

OTHER SITES IN COPELAND THAT HAVE BEEN CONSIDERED

CO1 Whitehaven Commercial Park

Reason for withdrawal: Both the existing HWRCs at Frizington in Copeland and at Workington in Allerdale are in need of replacement. Site AL37, on the border between the two Districts, has been put forward to replace them both; therefore, a further site is not needed in Copeland.

General

This was a first preference site for a Household Waste Recycling Centre to replace the one at Frizington.

This commercial park was laid out with estate roads nearly twenty years ago, but only about one third of the 18ha has been developed. The preferred site is adjacent to Copeland's depot and ideally located to serve Whitehaven. Habitat/species surveys will be needed with mitigation/compensation as appropriate. There is potential for its development to include habitat links across the site. Improvements to the roads may include a pedestrian crossing.

The Habitats Regulations Assessment concludes this site would not have impacts on the River Ehen or River Derwent and Bassenthwaite Lake SACs.

Summary of comments from previous consultation stages

This site, or an adjoining one, was supported for a North Copeland HWRC. It was considered to be the only one of the sites that were suggested that seemed appropriate for larger transfer/sorting type of facilities. This support was subject to further discussion on the potential types and siting of facilities.

Possible surface water drainage issues were mentioned.

Mitigation measures must be considered to prevent disturbance to wildlife interests.

It was considered that development on the site would have minimal landscape impact and had more suitable access for HGVs than other sites.

The other identified site, near the former Marchon/TDG works, was preferred on the basis of its location within the principal Key Service Centre in the area.

The parish council supports it if there are highways improvements before it opens and the parish is consulted about them.

The site is too near a food processing factory.

The owners, North West Development Agency, do not oppose the identification of this site in principle, its chief consideration is that uses should be compatible with a commercial park and not jeopardise the ability to attract future investment.

The site should not be considered unless a biodiversity audit has been carried out, it is within a hen harrier sensitive area and likely to have a high level of biodiversity interest, for which any losses would need to be compensated.

Environmental assets

Bonnywood County Wildlife Site (CWS) lies 600m away and Hope Mission CWS 620m. Midgey Wood Ancient Woodland is 1.5km away and Millgrove Wood Ancient Woodland, which is also semi-natural woodland UK Priority Habitat, is 2km.

The site is within a hen harrier sensitive area and otters have been recorded nearby.

A public footpath crosses the north east corner of the site.

Enhancement potential

A survey is needed to determine the current wildlife interest of the site. There is potential to enhance or create habitat links across the site and link to the footpath on the dismantled railway line that is used by people to get to Walkmill. The restored former Keekle extension opencast site is nearby.

No archaeological work is recommended.

Flood map zone

No identified flood risk

Safeguarding

The site is adjacent to the Workington to Whitehaven gas pipeline safeguarding area

Agricultural Land Classification

Grade 4 - less than 20% likelihood that this is Best and Most Versatile land

Landscape Character Area

Sub-type 5d – lowland, urban fringe

Sequential approach

A greenfield site, but allocated employment land already laid out with industrial estate roads, near to a town

CO12 Beckermat No.1 Pit, Haile, Egremont

Reason for withdrawal: This has been removed because planning permission has been granted for other development and there is now no available space. The alternative of using two adjacent fields is not considered appropriate.

CO28 ex-TDG depot, Whitehaven

Reason for withdrawal: The site has been sold and is not available.

General

This site was previously identified for a Household Waste Recycling Centre to replace the one at Frizington.

Summary of comments from previous consultation stages

This site gained some support, including being preferred to Whitehaven Commercial Park, because of its location within Whitehaven. However, it was also regarded as an inappropriate site for a Household Waste Recycling Centre because of its impact on regeneration schemes and tourism opportunities identified in the Copeland Local Plan.

It was considered that, following the demolition and clearance of the whole of the Rhodia complex, this site would effectively be in the middle of an area of open country.

Its development was also considered to have significant adverse impacts upon the work being promoted by the Coastal Fringe Task Group (Copeland Borough Council, English Partnerships, West Lakes Renaissance, Haig Mining Museum, Land Restoration Trust and National Trust) to enhance the landscape and promote the tourism potential of land between Whitehaven Harbour and St Bees Head and make the area more attractive to residents and visitors. Not only would the site itself detract from the amenity value of the surrounding area, but so would the attendant traffic (especially at weekends when recreational use of the adjoining land is likely to be at its greatest intensity).

The adopted Copeland Local Plan 2001 – 2016 designates the adjacent land as a 'tourist opportunity site' and not an 'employment opportunity site'.

With regard to the sequential selection of sites, the site is outside of the settlement boundary.

Environmental assets

St Bees Head SSSI lies 1km from the site and St Bees Heritage Coast is 1.2km; Woodhouse Quarry County Wildlife Site is 800m; heathland UK Priority Habitat is 1km and semi-natural woodland UK Priority Habitat, which is also un-named Ancient Woodland, is 1.3km away. A public footpath is adjacent to the southern boundary.

Enhancement potential

Limited potential for general enhancement.

Site of a former farmhouse, so archaeological mitigation may be appropriate.

Flood map zone

No identified flood risk

Safeguarding

The Workington to Whitehaven gas pipeline safeguarding area crosses the site

Agricultural Land Classification

Urban

Sequential approach

Brownfield site at a town

CO29 Haig Enterprise Park, Whitehaven

Reason for withdrawal: There are sub-standard road access and junction issues, which are unlikely to be able to safely accommodate significant additional traffic.

General

This site was put forward for local waste recycling, due to the fact that there is a lack of Household Waste Recycling Centres in the area.

Summary of comments from previous consultation stages

People in the area consider that the site will be ideal, bearing in mind the lack of HWRC sites in the vicinity.

The area proposed falls within the 'Whitehaven Coast' project area. This is directly linked to the 'St Bees Cliffs and Coast' project, which is working with local landowners to restore coastal habitats, improve access, improve the landscape and enhance the historic value of the area, whilst demonstrating socio-economic benefits.

Environmental assets

St Bees SSSI is 200m away from the site; Woodhouse Quarry County Wildlife Site (CWS) is 870m and Castlepark Wood CWS is 1.1km; the Woodland Trust Nature Reserve at Arrowthwaite is 250m and the one at Crow Park is 1.1km; there are two areas of UK Priority hHabitat - heathland is 1.5km away and coastal habitats above high water is adjacent; it is also adjacent to Arrowthwaite Regionally Important Geomorphological Site (RIGS).

Haig Colliery Scheduled Ancient Monument (SAM) is adjacent, Old Quay and Old Quay Lighthouse Scheduled Ancient Monument and Listed Building is 800m away, as is Whitehaven Old Fort SAM and Listed Building; Saltom Coal Pit SAM is 160m away and two Conservation Areas are close by - Whitehaven Town Centre 480m and Corkickle is 1km.

There is a public footpath adjacent to the western boundary.

Enhancement potential

A constrained site, with little potential for enhancement.

Site of former Haig Pit Colliery - mitigation may be required for industrial archaeology.

Flood map zone

No identified flood risk

Safeguarding

No safeguarding issues have been identified

Agricultural Land Classification

Urban

Sequential approach

Brownfield site at a town

CO31 Keekle Head former opencast site, Pica, Workington

Reason for withdrawal: A planning application for a purpose built facility for such wastes was submitted in December 2009, but was refused permission in May 2012. The Council's policy is that it would be premature to identify sites at a distance from where radioactive wastes arise, unless it has been demonstrated that they cannot be managed within or adjacent to the nuclear site.

General

This unrestored opencast coal site was put forward for consideration as a landfill for the disposal of Low Level and Very Low Level radioactive waste (LLW and VLLW) from nuclear decommissioning.

The site is subject to an Enforcement Notice, requiring the owners to restore the land, in accordance with the original planning permission.

Summary of comments from previous consultation stages

This site falls directly within the West Cumbria hen harrier sensitivity area. Internationally important populations of wintering hen harriers occur in this area and so any loss of semi-improved rushy pasture and other prey-rich habitats could result in the loss of key hen harrier foraging areas. The site proposed lies directly adjacent to a key roost complex site. The hen harrier sensitivity area does not have any statutory nature conservation protection, but is considered to be equivalent to a SSSI/Special Protection Area.

The plan needs to identify a range of sites, including this one, for managing LLW and VLLW radioactive wastes.

Environmental assets

Dean Moor County Wildlife Site (CWS) is 220m away from the site, whilst Gilgarran Plantation CWS and Wilson Park Verge & Field CWS are adjacent to the northern boundary, Sandbeds Meadows CWS is adjacent to the south west, High Park (near Arlecdon) CWS is adjacent to the south east and Studfold Willow Patch CWS is within the site. Struthers Wood Ancient Woodland is 325m away and Tutehill Wood Ancient Woodland is 670m. There are three areas of UK Priority Habitat - semi-natural woodland is 300m away, whilst both fen, marsh & swamp and lowland & dry acid grassland are within the site. It lies within the hen harrier sensitive zone.

A stone circle and cairn on Dean Moor constitute a Scheduled Ancient Monument around 540m away.

A public footpath crosses the site.

Enhancement potential

The approved restoration scheme would protect/enhance habitats - otters, reptiles, birds, hen harrier sensitive zone.

Flood map zone

No identified flood risk

Safeguarding

No safeguarding issues have been identified

Agricultural Land Classification

Grade 4 - less than 20% likelihood that this is Best and Most Versatile land

Sequential approach

Unrestored greenfield site

CO33 Distington landfill extension, Lillyhall, Workington

Reason for withdrawal: There is substantial remaining permitted capacity in the adjoining Lillyhall landfill and no need for additional landfill capacity within the Plan period has been identified in the 2014 Cumbria Waste Needs Assessment.

General

The existing landfill is virtually completed and there is a current planning application to allow landfilling to continue till the end of 2010, with restoration by October 2011. Greenfield land has been put forward for consideration to extend the landfill site. This is not a preferred site, notwithstanding arguments about maintaining competition.

Environmental assets

Alcan Wildlife Area County Wildlife Site (CWS) is adjacent to the site, whilst Oily Johnnies Willow Patch CWS is 1.3km and Harrington Railway Line CWS is 1.6km away. An area of un-named Ancient Woodland, which is also semi-natural woodland UK Priority Habitat, is 500m away.

The site falls wholly within the hen harrier sensitive area.

Stubsgill Farmhouse complex is the closest Listed Building at 850m. A public footpath runs along the southern edge of the site and a bridleway runs along the north east edge. Cycle route 72 is close by.

Enhancement potential

There would be potential in a restoration scheme.

There are archaeological remains in the vicinity, so mitigation measures may be required.

Flood map zone

Flood zone 2 affects a small part of the site

Safeguarding

The Workington to Whitehaven gas pipeline safeguarding area lies 2km to the east, the Workington to Winscales gas pipeline safeguarding area lies 2km to the north

Agricultural Land Classification

The northern part of the site is Grade 4, whilst the southern part is Grade 3 - less than 20% likelihood that this is Best and Most Versatile land

Sequential approach

Greenfield site at a town

CO34 Redhills Quarry, Millom

Reason for withdrawal: The County Council held a public consultation in early 2012 on its HWRC policy. Due to the economic recession and austerity measures, it was decided that only those HWRCs that needed replacement would be developed. There is an existing HWRC close to this site.

General

This was the first preference site for a redeveloped Household Waste Recycling Centre, close to the existing one.

The Habitats Regulations Assessment concludes that, without mitigation measures for Natterjack Toad habitat, drainage and litter control, it is likely to affect the Morecambe Bay SAC and Duddon Estuary SPA/Ramsar. Species surveys will be needed.

Summary of comments from previous consultation stages

This is a greenfield site with access issues.

The Borough Council considers that the site would help to give a north-south spread throughout the Borough.

The site is too sensitive on biodiversity grounds.

No highway objections.

Consultees preferred this site to be retained, close to the existing one, rather than an alternative location being found.

Environmental assets

Morecambe Bay SAC, Duddon Estuary SPA, SSSI and Ramsar are all adjacent to the site, the access track runs through them. The site also lies within the Duddon Estuary and Duddon Mosses SSSI consultation area. Hodbarrow RSPB Nature Reserve is adjacent; Hodbarrow Point Regionally Important Geomorphological Site (RIGS) is 275m; UK Priority Habitat coastal habitats above high water is adjacent; UK Priority Habitat coastal and floodplain grazing marsh is 165m; Millom Ironworks Local Nature Reserve is 830m; and Millom Marsh County Wildlife Site is 1.5km.

The site lies within the Natterjack Toad site identified by the Amphibian and Reptile Conservation Trust. However, this site's habitat, a mosaic of tall semi-natural grassland, with species-rich short grassland areas, is unsuitable for natterjacks. This vegetation may be considered to be UK Priority Habitat - Open Mosaic Habitats on Previously Developed Land.

Millom Conservation Area lies 1.1km away and the closest Listed Building, an ex-Hodbarrow Mine office in Millom, is 740m away.

Enhancement potential

A small site with some enhancement potential, especially if the total area included in the development boundary is considerably greater than the area of the development itself. Surveys required for breeding and over-wintering birds, reptiles, invertebrates and botanical interest.

Flood map zone

No flood risk was identified

Safeguarding

No safeguarding issues were identified

Agricultural Land Classification

Grade 6 - non-agricultural

Sequential approach

Brownfield site at a Key Service Centre

M22 Birkhams Quarry, St Bees

Reason for withdrawal: This site was originally identified as an Area of Search for extending this building stone quarry. In the light of the comments received during consultations, the land next to this quarry was considered instead as a Mineral Safeguarding Area. There is, however, insufficient evidence available at the present time to develop a comprehensive MSA for all types of building stone in Cumbria and an MSA for one quarry, without others that may be equally important, is not considered to be sound. This issue will be kept under review.

General

The existing quarry is very small scale, restricted to working outside the summer tourist season and seasonally employs a team of six workers. The stone produced is taken to a regional sawing facility, employing 48 people, and accounts for some 25-30% of that facility's output. The quarry has very restricted traffic movements, allowing only one vehicle to leave the site each day.

Any planning application would have to consider the balance between supplying local vernacular stone and the environmental impacts of extending the quarry. Further work on sources of building stones could be undertaken at a later stage, in conjunction with all the Cumbria districts.

Summary of comments from previous consultation stages

This site lies within the 'St Bees Cliffs and Coast' project area. The project is working with local landowners to restore coastal habitats, improve access, improve landscape and enhance the historic value of the area, whilst demonstrating socio-economic benefits. The extension of the quarry could have a negative effect on the aims of the project, although further detailed information would need to be provided and partners would need to be consulted. There would be impacts on the work promoted by the Coastal Fringe Task Group.

Large quarry vehicles negotiate the small village of Sandwith onto a single track road and public footpath, which is used by thousands of long distance walkers who have to turn back to allow lorries to pass.

The site assessment scores are arguably misleading due to the conflict with the purposes and targets for Heritage Coast sites; this is the only stretch of Heritage Coast between North Wales and Scotland and has very special landscape qualities. Copeland BC strongly objects, stressing the importance of St Bees Heritage Coast, SSSI and RSPB reserve.

There would be significant impacts on habitats and species; there is no evidence of significant ongoing habitat restoration at the quarry. This is coastal habitat.

There appears to be no permanent local employment. There are alternative sources of stone.

Environmental assets

The existing quarry lies within the St Bees Head SSSI and Regionally Important Geomorphological Site (RIGS), and partly within the St Bees Head Heritage Coast. The site is adjacent to an area of heathland UK Priority Habitat; it lies 900m from an RSPB Nature Reserve; is 1.5km from Rottington Common County Wildlife Site (CWS), which is also Ancient Woodland and semi-natural woodland UK Priority Habitat; and is 1.6km from Roska Park & Bellhouse Gill Wood CWS.

The Scheduled Ancient Monument of Barrowmouth Gypsum and Alabaster Mine, at Saltom Bay, is 230m away.

The Cumbria Coastal Footpath, a public right of way, used to run through the site, but has now been diverted and improved by the quarry operator.

Enhancement potential

At present, the site comprises improved grassland, so there is potential for habitat enhancements/creation.

The site is a geological SSSI; continued operation of the quarry exposes more features of interest and the operators can provide safe, supervised access for interested study groups.

No archaeological work is required.

Flood map zone

No flood risk identified

Safeguarding

No safeguarding issues identified

Agricultural Land Classification

Grade 3 - greater than 60% likelihood that this is Best and Most Versatile land

Sequential approach

Existing quarry operations

M23 Grange Quarry, Egremont

Reason for withdrawal: Due to its small size, it is more appropriate to consider under the planning application process rather than through the Development Framework. This has not been identified as a preferred site.

Environmental assets

Carltonmoor Wood County Wildlife Site (CWS) lies 250m away; Oxenriggs Pond CWS is 1km; Fish Hatcheries CWS is 1.5km; and Mousegill Quarry Regionally Important Geomorphological Site (RIGS) is 1.6km away.

The Lake District National Park boundary is just over 2km away.

Enhancement potential

Limited potential for habitat enhancements/creation.

Flood map zone

No flood risk identified

Safeguarding

No safeguarding issues identified

Agricultural Land Classification

Grade 3 - greater than 60% likelihood that this is Best and Most Versatile land

Sequential approach

Existing quarry operations

THE FOLLOWING SITES WERE CONSIDERED, BUT EXCLUDED, AT THE EARLIER STAGES OF THE ISSUES AND OPTIONS DISCUSSION PAPER (2006) AND THE ORIGINAL PREFERRED OPTIONS (2007)

CO2 Hensingham Common, New Monkray - gone before Issues & Options 2006

CO3 Sneckyeat Industrial Estate - already committed to other development

CO4 Marchon Works, Whitehaven – not a suitable location for an HWRC

CO5 Pow Beck, Whitehaven – unsuitable location for an HWRC

CO6 area behind CJP Books, Millom – employment allocation reduced

CO7 Devonshire Road, Millom - gone before Issues & Options 2006

CO8 Millom slag bank - not compatible with owners intentions

CO9 Leconfield Industrial Estate - already committed to other development

CO10 Cleator Moor Industrial Estate - gone before Issues & Options 2006

CO13 land at Cleator Mills - other development proposals

CO14 Furnace Row, Distington - gone before Issues & Options 2006

CO15 Egremont north, adjacent A5086 - gone before Issues & Options 2006

CO16 Westlakes Science Park - gone before Issues & Options 2006

CO17 Millom Pier - adjacent to Duddon Estuary internationally important wildlife site

CO18 Frizington industrial estate - insufficient area remaining

CO19 part of field 3800, Cross Lane - gone before Issues & Options 2006

CO20 Red Lonning Industrial Estate, Whitehaven - gone before Issues & Options 2006

CO21 part of field 0040, Scalegill Road - gone before Issues & Options 2006

CO22 Millom Road Industrial Estate, Millom - gone before Issues & Options 2006

CO23 ironworks, Devonshire Road, Millom - gone before Issues & Options 2006

CO24 former Micklam brickworks, Lowca - gone before Issues & Options 2006

CO25 Trumpet Road, Cleator Moor - gone before Issues & Options 2006

CO26 adjacent Kangol factory, Cleator - gone before Issues & Options 2006

CO27 Wilson Pitt Road, Whitehaven – adverse effect on regeneration scheme

CO30 adjacent to railway, Millom - greenfield, no specified boundaries