



**Planning and Compulsory Purchase Act 2004
Town and Country Planning
(Local Planning) (England) Regulations 2012**

REGULATION 18 CONSULTATION

**draft Cumbria Minerals & Waste Local Plan
2014 to 2029**

SUPPLEMENTARY SITES CONSULTATION

October 2015

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1. Introduction

- 1.1. Cumbria County Council is the local planning authority for mineral working and waste management developments in the county, outside the two National Park areas. In this role, it is responsible for determining planning applications and also for preparing planning policy for those types of development.
- 1.2. Without the right waste management facilities and adequate supplies of minerals, other sectors of the economy could not function properly. They are essential for the county's development and regeneration initiatives, its low carbon agenda and for maintaining and improving the basic infrastructure of roads, buildings and other facilities. The minerals and waste industries also provide important direct local economic benefits, including jobs.

Site Allocations

- 1.3. Building on the work carried out between 2009 and 2012 on the draft Site Allocations Policies, one document within the suite of Minerals and Waste Development Framework documents, Cumbria County Council has carried out three consultations on the Minerals and Waste Local Plan, which have encompassed site allocations alongside strategic and development control policies.
- 1.4. In 2012, an initial consultation was held on the Local Plan, which included a 'call for sites' from minerals and waste operators. In February 2013, a Regulation 18 Preferred Options consultation was held, which included some additional sites, some amended site boundaries and also removed some sites further to those identified in 2012. In March to May 2015, a second Regulation 18 consultation was held, which again added, amended or removed sites.

Consultation

- 1.5. In response to the Preferred Options consultation held in spring 2015, a small number of additional sites were put forward for consideration, as well as revised information for some sites that had been included in the consultation. This Supplementary Sites Consultation document has now been produced to provide an opportunity for members of the public and other interested parties to offer their comments on the new or revised information.

- 1.6. This is a 4-week focused consultation, solely on the additional and revised sites that have been put forward for inclusion in the Cumbria Minerals and Waste Local Plan. Any representation that does not concern these additional or revised sites will not be accepted. Therefore, submission of any further sites for consideration of their inclusion in the Local Plan, will also not be accepted.
- 1.7. Previous comments made regarding the sites published in the Regulation 18 Preferred Options consultation held from March to May 2015, will continue to be taken forward, including those relating to sites for which revised information has now been received.
- 1.8. It is emphasised that the inclusion of sites or areas in this consultation does not imply that permission will be given for development in these locations if an application were forthcoming in the future. The sites have been subject to a range of assessments, details of which are set out in the three accompanying evidence base documents:
- Sustainability Appraisal
 - Habitats Regulations Assessment
 - Site Assessments document

For quick reference, the summary assessment of each site in these three documents is included in section 7 of this overarching document.

2. How to Get Involved

- 2.1. The County Council are seeking your views on the additional and revised sites. There are a number of ways that you can get involved and these are set out below:
- send your response via email to: mwlp@cumbria.gov.uk
 - written response by post to: The Minerals and Waste Planning Policy Team, Cumbria County Council, County Offices, Buser Walk, Kendal, LA9 4RQ
- 2.2. The consultation is open to all, but as this is a Supplementary Sites consultation, responses must be received by the deadline of **5pm Monday 9 November 2015**.
- 2.3. If you would like to speak to someone about this consultation please contact the Minerals and Waste Planning Policy Team on:

01539-713409 or 01539-713425

- 2.4. Full details about the draft Cumbria Minerals and Waste Local Plan (MWLP) that was consulted upon March to May 2015, including the suite of supporting documents and maps, are available on our website: http://www.cumbria.gov.uk/planning-environment/policy/minerals_waste/MWLP/Consultations.asp

3. Next Steps

- 3.1. All comments received on the Supplementary Sites consultation will be considered and the Council will amend the draft Minerals and Waste Local Plan as necessary. It is currently anticipated that a 'publication version' of the Local Plan will be consulted upon and submitted to the Planning Inspectorate in the first half of 2016.
- 3.2. We currently expect the Minerals and Waste Local Plan to be formally adopted by the end of 2016.

4. Proposed Additional and Revised Sites

- 4.1. In response to the Cumbria Minerals and Waste Local Plan Regulation 18 Preferred Options consultation in early 2015, a number of representations were received that put forward nine additional sites for inclusion in the MWLP, plus two amended boundaries for existing site allocations. A list of the additional and amended sites is set out in the table below.

Table 4.1: Site Allocations and Amendments Proposed in Response to Regulation 18 Preferred Options Consultation (2015)

Ref	Site	Allocation Request
S1	Roosecote sand and gravel quarry, near Barrow (Barrow)	Preferred Area for sand and gravel extraction
S2	Goldmire limestone quarry, near Barrow (Barrow)	Area of Search for limestone extraction
S3	Distington waste management facility and former landfill site, near Workington (Copeland/Allerdale)	Increased area for waste management/treatment Installation of solar panels on former landfill

S4	Flusco waste management complex, near Penrith (Eden)	Increased area for waste management/treatment within the Flusco site Transfer of secondary aggregates production to Silver Fields quarry from elsewhere on Flusco site (initial submission requested additional area in error) Installation of solar panels on landfill area
S5	Hespin Wood waste management complex, near Carlisle (Carlisle City)	Increased areas for waste treatment for: - Materials Recovery Facility and/or composting - other waste treatment (thermal treatment plant proposed in initial submission) Installation of solar panels on existing landfill area Extension of time for landfill operations
S6	South Walney former landfill site, near Barrow (Barrow)	Installation of solar panels on former landfill
S7	Kirkhouse sand and gravel quarry, near Brampton (Carlisle City)	Area of Search for sand and gravel extraction Inert landfill within existing quarry Secondary aggregates production in existing quarry
S8	Blencowe limestone quarry, near Penrith (Eden)	Area of Search for limestone extraction
S9	Roan Edge Landfill (South Lakeland)	Area of Search for gritstone extraction to facilitate extension of inert waste landfill Increased area for inert waste recycling for aggregates production facilitated by gritstone extraction.
S10 (M14)	Kirkby Slate Quarry, Kirkby-in-Furness (South Lakeland)	Increased area to deposit mineral waste in order to facilitate development of M14
S11 (CA30)	Kingmoor Road recycling centre, Carlisle (Carlisle City)	Increased area for waste management

4.2 Following receipt of the representations proposing the additional or revised sites, meetings were held between the County Council and each relevant operator, in order to discuss the proposals in more detail. As a result of this discussion, all the allocations sought for the installation of solar panels, on existing and former waste management sites, were withdrawn (S3 Distington former landfill, S4 Flusco landfill complex, S5 Hespin Wood landfill complex and S6 South Walney former landfill).

4.3 The reason for withdrawal is that applications for solar panels would normally be dealt with by the relevant District/Borough Council; they would only be determined by the County Council where they may affect the operation or restoration of a minerals or waste site. Policy DC8 in the draft MWLP provides criteria for the determination of renewable energy developments (that conform to all other policies in the Plan) at minerals and waste sites. For South Walney (S6), as the site restoration has been completed this would be a matter for the District Council. Therefore, any proposal for solar panel installation would be dealt with as a planning application by the relevant planning authority, rather than as an allocation in the MWLP.

4.4 Other changes resulting from dialogue with the operators are:

- S3 Distington waste management facility – reduction in size of the proposed extension area to carry out waste management/treatment
- S4 Flusco waste management complex - reduction in size of the proposed extension area to carry out waste management/treatment and also correct relocation of area to undertake inert waste recycling inside the current planning permission boundary
- S5 Hespian Wood waste management complex – withdrawal of request for support of time extension to landfilling operations (this can only be considered by planning application) and replacement of specific request for an Energy from Waste plant allocation to a general request for a waste management/treatment facility
- S9 Roan Edge inert landfill – reduction of Area of Search for gritstone, thus also reducing the proposed increase to both the inert waste landfill capacity and the area for inert waste recycling to produce aggregates

4.5 The final proposals on which the County Council is consulting are set out in section 7 of this document, including plans of each site.

5. Policy Context

5.1. The site allocations set out in the MWLP Preferred Options consultation in February 2015 were included in order to meet needs identified from the Local Plan's evidence base and as specified in the Plan's Strategic Policies. The sites were also considered through Site Assessment, Sustainability Appraisal and Habitats Regulations Assessment. The same suite of reports on the proposed sites set out in Table 4.1

above are available as part of this Supplementary Sites consultation, while the need for, and appropriateness of, these proposed additional and revised site allocations is considered in the following paragraphs.

5.2. The proposals on which we are consulting consist of:

- Two areas for extraction of sand and gravel (S1 Roosecote Quarry and S7 Kirkhouse Quarry);
- One area for extraction of gritstone (S9 Roan Edge Landfill);
- Two areas for extraction of limestone (S8 Blencowe Quarry and S2 Goldmire Quarry);
- Three areas for inert waste recycling and secondary aggregates (S7 Kirkhouse Quarry, S9 Roan Edge Landfill, and S4 Flusco, Silver Fields Quarry);
- Two areas for inert waste landfill (S7 Kirkhouse Quarry, S9 Roan Edge Landfill);
- Three areas for waste management/treatment facilities (S3 Distington waste management facility and former landfill, S5 Hespian Wood waste management complex, and S4 Flusco waste management complex);
- Two areas, included as site allocations in the MWLP Preferred Options (February 2015), where additional areas have been proposed (S10 (M14) Kirkby Slate Quarry and S11 (CA30) Kingmoor Road recycling centre).

Minerals Policy

5.3. The Strategic Policy for minerals in the February 2015 draft Minerals and Waste Local Plan is contained in Policies SP7 (Minerals Provision and Safeguarding) and SP8 (Strategic Areas for New Mineral Developments). Policy SP7 commits the Council to identify Preferred Areas and/or Areas of Search to enable landbanks for sand and gravel (7 years) and crushed rock (10 years) to be maintained throughout the Plan period, and to enable continued working of high and very high specification roadstone. Policy SP8 identifies the area near Roosecote as a strategic area for the supply of sand and gravel in the south west of the county, sandstones near Roan Edge and Holmescales Quarries for supply of high specification roadstone, and the area around Kirkby Slate Quarry for further supplies of slate.

Sand and Gravel

- 5.4. Data analysis for the 2015 Cumbria Local Aggregates Assessment (shown in Annex 2 and based on mineral reserves at 31 December 2014 and sales for the 2014 calendar year) shows that the total aggregate reserve for sand and gravel at the end of 2014 was 9.20 million tonnes (MT). Sales of sand and gravel aggregates from Cumbrian quarries have recovered following 5 years of recession, giving a 10 year rolling average sales figure of 0.63 MT and a landbank of 14.60 years. However, if sales stabilise at 0.70 MT per annum, the landbank would only be 13.53 years.
- 5.5. Modelling shows, that in the scenario of average sales across the entire Plan period rising to 800,000 tonnes per annum (tpa), the landbank would only be 11.50 years. The additional reserve (over and above currently permitted areas) required to maintain a 7 year landbank at the end of the Plan period in 2030 would be: 5.3 MT at the 10 year rolling average; 6.4 MT at 2014 sales levels; and 9.2 MT at an average sales level of 800,000 tpa.
- 5.6. The site allocations for Areas of Search or Preferred Areas at High House/Overby Quarries (M6), Cardewmires Quarry (M8), Peel Place Quarry (M15) and Roosecote Quarry (M12) that were already included within Policy SAP4 in the February 2015 MWLP Preferred Options could be roughly estimated as containing 10 MT, based only on the permitted mineral resources on the adjoining sites. However, no such estimates are yet available from the relevant operators. It is by no means certain that planning applications would be submitted, or approved, on these areas, or that time extensions would be granted on existing sites whose current planning permissions expire within the Plan period.
- 5.7. In addition, major infrastructure projects proposed for Cumbria include Moorside new nuclear power station, the North West Coastal Connections Project (providing an upgraded transmission network along the west coast of Cumbria) and the upgrading of the BAE shipyard at Barrow.
- 5.8. It is therefore considered to be consistent with Policy SP7 to identify additional areas (S1 Roosecote Quarry and S7 Kirkhouse Quarry) for sand and gravel extraction, which have been proposed by operators in representations on the Feb 2015 Regulation 18 MWLP Preferred Options consultation.

- 5.9. The representation with respect to the additional site at Roosecote explains why additional reserves are likely to be required to support the upgrading of the Barrow shipyard, and also that it could be sensible to bring forward the area now proposed, in advance of the existing site allocation M12, so that subsequent developments at the gas terminal could be accommodated without sterilising the aggregate. It would, therefore, be consistent with Policy SP8 to allocate the proposed new site S1 Roosecote Quarry.
- 5.10. The proposed site S1 would constitute an extension southwards from the existing Roosecote Quarry, for which there is confidence in volume and quality. The existing site allocation of M12 (in the February 2015 draft MWLP) would constitute a new quarry on a greenfield site, for which there is currently less confidence in volume and quality. It is suggested, therefore, that if S1 were to be included as a Preferred Area for sand and gravel extraction in the Local Plan, then site M12 should either be amended to an Area of Search or removed. Based on the modelling for the 2015 Local Aggregates Assessment, it would be preferable that M12 were regarded as an Area of Search, with the potential to come forward once S1 had finished operations.

Gritstone (sandstone and igneous HSA and non HSA)

- 5.11. The additional Area of Search (S9) at Roan Edge Landfill has been put forward as part of an overall proposal to increase void space for inert landfill, and also to extend the existing inert waste recycling facility, both facilitated by prior extraction of gritstone. The waste elements are discussed in paragraphs 5.27 and 5.32 below; however, it is also necessary to consider the proposed mineral extraction as a minerals Area of Search under Policy SAP4, which lists those areas for minerals required under Strategic Policy SP7.
- 5.12. Site S9 is adjacent to and slightly overlaps site M30, which is a site allocated in the February 2015 draft MWLP Preferred Options for extraction of high specification roadstones (HSA). The mineral from the current engineering operations at Roan Edge inert landfill is sold for rail infrastructure and general construction work. The initial submission, and supplementary information provided by the operator, in relation to S9 refers to high specification roadstones lying at a deeper level than the less valuable gritstone, and also the potential for deeper extraction to retrieve the stone to the best commercial advantage.

- 5.13. Data analysis for the 2015 Cumbria Local Aggregates Assessment (LAA) does not indicate a need for additional non-HSA sandstone or igneous crushed rock (i.e. gritstone), because the landbank for non-HSA sandstone or igneous crushed rock is 79.10 years, while annual sales have continued to fall since 2010.
- 5.14. Reserves of high, and very high, specification roadstones (VHSA) within Cumbria are currently 10.98 MT at the end of 2014, and the 10 year rolling average sales were 620,000 tonnes, giving a landbank of 17.7 years. The granting of a new planning permission in early 2015 increased the reserve by 6.78 MT, and current reserves are now more than sufficient to maintain a 10 year landbank at the end of the Plan period.
- 5.15. Government proposals for increased road building, and potential restrictions on quarrying in designated areas (such as National Parks) outside Cumbria, indicate that sales will rise significantly from the 2014 sales level of 380,000 tonnes, and the landbank figure assumes that they would maintain an average of 620,000 tpa over the whole period, as in the last 10 years. Current reserves are more than sufficient to maintain a 10 year landbank at the end of the Plan period on the basis of the 10 year rolling average, and two further Areas of Search (M30 Roan Edge Quarry and M16 Holmescales) for HSA were included as site allocations in the February 2015 MWLP Regulation 18 consultation to ensure adequate provision in the future (beyond 2040).
- 5.16. However, recent modelling for the 2015 LAA shows that, even if HSA sales averaged 800,000 tpa over the entire Plan period (more than double current levels), only 3 MT would be required to provide a 10 year landbank at 2030. The two further Areas of Search (M30 and M16) for HSA included as site allocations in the February 2015 MWLP Regulation 18 consultation would secure this amount, and adequate provision for the future (beyond 2040). It is, therefore, not considered that Policy SP7 or SP8 support an additional Area of Search for extraction of either HSA or gritstone.
- 5.17. The regionally important HSA resource and the nationally important VHSA resource are, however, safeguarded by a specific Mineral Safeguarding Area and Strategic Policy SP8, which defines them as a strategic resource. This needs to be protected for the long term. Although the detail of the geology at site S9 has not been identified, allocation of an Area of Search for gritstone, i.e. use for other purposes, is considered to be inappropriate.

Limestone

- 5.18. Strategic Policy SP7 reflects national planning policy, in requiring that a 10 year landbank for crushed rock should be maintained throughout the Plan period. In practice the Council seeks to maintain this for each type of crushed rock, which is a much more stringent approach. The data for the 2015 LAA shows that limestone aggregate reserves at the end of 2014 were 96.26 MT, which represented a landbank of 42.59 years at 10 year rolling average sales. This included a reduction due to potential re-evaluation of reserves in one inactive limestone quarry.
- 5.19. Modelling shows, however, taking into account potential further re-evaluation of reserves in 2015, and in the scenario that crushed limestone sales averaged at 3 MT per year to 2030, the landbank would still stand at 14 years. Policy SP7, therefore, does not require the addition of site allocations for limestone extraction.
- 5.20. The proposal for a lateral extension to Goldmire Quarry (S2) argues that the other two operating limestone quarries in the south of the county have expiry dates within the Plan period, whilst the proposal for a new quarry at Blencowe (S8), near Newbiggin, Penrith, argues that it would serve a local concrete products manufacturer.
- 5.21. National policy guidance¹ makes it clear that planning applications might come forward in areas where the landbank is adequate, and states that each application must be considered on its own merits. Some of the reasons why this may be appropriate are listed in the guidance, and include the location of the resource in relation to main market areas. Such reasoning, together with appropriate evidence, can be submitted in support of a planning application, and this would be consistent with PPG paragraph 84.
- 5.22. The County Council considers that it is NOT appropriate to make a site allocation in the absence of a strategic policy requirement. One site allocation has already been made in the MWLP Preferred Options (February 2015) at a limestone quarry (M10 Silvertop Quarry), but that was a small area required to make the permitted quarry area workable and did not involve an increase in the landbank. Both proposals (S2 Goldmire Quarry and S8 Blencowe Quarry) should, therefore, be taken forward through planning applications.

¹ Planning Practice Guidance (PPG) - Reference ID: 27-084-20140306

Slate

- 5.23. Through the Strategic Policies SP7 and SP8 in the MWLP Preferred Options (February 2015), one site was allocated as an Area of Search for slate in Policy SAP4; this is site S10 (M14) Kirkby Slate Quarry. This site allocation was made because a planning application is currently being prepared, which seeks the vertical (deepening) and lateral extension of the existing quarry over five phases. The Wray Castle slate formation, in which the quarry lies, is regarded as a strategic resource and the quarry has an international market.
- 5.24. The proposal now put forward is for an addition to the existing site allocation, to enable the infill and restoration of the former Winnow End Quarry that lies to the south west of the existing Kirkby Slate Quarry. This would facilitate a disposal route for the approximately 6.5 million cubic metres of rock and overburden that will need to be extracted to access the workable slate. It would also decrease the area dedicated to tips (rock waste storage) within the working area of Kirkby Slate Quarry.
- 5.25. The operator has proposed adding Winnow End Quarry as an extension to the Area of Search, but stated that the operation would be put forward as a separate planning application. However, as the proposal is for infill and restoration, rather than for extraction, it is considered that it is neither necessary nor appropriate for the additional area to be part of the Area of Search for mineral extraction.

Waste Policy

- 5.26. The Strategic Policy for waste in the February 2015 draft Minerals and Waste Local Plan is contained in Policies SP2 and SP3. Policy SP2 (Provision for Waste) commits the Council to providing a self-sufficient, integrated waste management network for all of Cumbria's wastes (excluding radioactive waste, as this is dealt with under separate policies). Policy SP3 (Waste Capacity) builds on the principles in Policy SP2, in order to provide waste infrastructure for current and future needs, as identified by the Waste Needs Assessment, which is part of the Local Plan's evidence base.

Inert Waste Recycling

- 5.27. The 2014 Waste Needs Assessment (WNA) did not identify a capacity gap for inert waste recycling and secondary aggregates production, although some of the existing facilities have planning permissions that expire within the Plan period. As a result, the MWLP Preferred Options (February 2015) did not allocate any new sites for this purpose, preferring to provide a supportive policy for both time extensions and suitable new developments, should they come forward. If sites had been allocated, they would have been under a separate policy, not SAP2 (Waste Treatment and Management Facilities), because the operations can have significant noise and visual impacts that require specific consideration.
- 5.28. Development Control Policy DC9 (part f. construction and demolition, mineral or excavation waste recycling) continues a previous policy that supports proposals for inert waste recycling on suitable industrial estates or active quarries and landfill sites. This has been successful, and production of secondary aggregates from inert waste recycling in Cumbria in 2014 has been increasing. Estimated sales in the year to 31 December 2014 were 300,000 tonnes² from an increasing number of facilities. Many facilities are now permanent, but some have expiry dates linked to the quarry or landfill in which they are situated. The recycling of inert waste and production of aggregates provides considerable benefits to the economy and the environment, and policy would support suitable new developments, as well as proposals for time extensions, especially if the “host” quarry or landfill was not completed, and was to have its life extended.
- 5.29. Each of the three proposals (S7 Kirkhouse Quarry, S9 Roan Edge Landfill, and S4 Flusco, Silver Fields Quarry) is associated with a quarry, a landfill, or both, and could be considered under Policy DC9, if a planning application were submitted.
- 5.30. Strategic Policy SP3 provides further “in principle” support for waste sites that accommodate several types of facility, or are well located to the sources, or destination, of the wastes being managed. Policy SP3 also enables waste proposals on unallocated sites to be considered, and any proposals for provision related to major infrastructure projects to be considered against relevant policies in the Local Plan.

² 2015 NW Aggregates Working Party - Aggregate Survey, September 2015

- 5.31. It is therefore thought that it remains appropriate to consider proposals for inert waste recycling on a “case by case” basis, rather than allocate any sites at this stage. Planning applications would also be able to consider the interlinked issues of inert recycling, inert waste and minerals extraction in each proposal.

Inert Waste Landfill

- 5.32. The MWLP Preferred Options (February 2015) did not allocate any sites for inert landfill. Four existing sites with capacity were identified in the Local Plan, although two of those sites have planning permissions that expire within the Plan period. It was also noted that additional inert waste arisings were anticipated from major infrastructure, and this would need to be kept under review.
- 5.33. Strategic Policy SP3 seeks to meet any capacity need by supporting proposals for new inert landfill capacity where there is a need for the development and it would not undermine the waste hierarchy. Development Control Policy DC10 (Criteria for Landfill and Landraise) and Policy DC11 (Inert Waste for Agricultural Improvement) also enable landfill as long as reuse or recycling as soils or secondary aggregates are prioritised, and material remains available for use in reclamation/restoration schemes.
- 5.34. In response to the representations to the MWLP Preferred Options consultation in February 2015, and development work for a 2015 Waste Needs Assessment Review, the text of the Local Plan is likely to be amended to include a predicted range for inert landfill needs, together with minor amendments to the wording of Policy SP3. These would provide more support for time extensions for inert landfills, and for additional capacity to meet the predicted need.
- 5.35. However, the inert waste arisings from the potential developments at Moorside new nuclear power station and the North West Coastal Connections Project (providing an upgraded transmission network along the west coast of Cumbria) have still not been quantified. Some material removed may be re-usable or recyclable and, in any case, volumes to be disposed of by landfill should be minimised. The potential capacities of the two inert landfill site proposals that have been included in the newly proposed sites have also not been quantified; this cannot, therefore, be a numerical assessment at this stage.

- 5.36. The high cost of transport would also favour provision in close proximity to the source of any major arisings. Specific additional facilities could be sought, and the current policy is deliberately flexible to cater for such possibilities.
- 5.37. However, allocation of sites as part of the Local Plan should be considered now that proposals have been made. If one or more sites are to be included, it is considered that a further Site Allocations Policy, specific to inert waste landfill, would be required.

Waste Management or Treatment

- 5.38. The MWLP Preferred Options (February 2015) allocated 8 sites for waste management or treatment, to accommodate a potential need for 3 additional facilities (as identified in the Waste Needs Assessment). Policy SP3 also accepted the possibility of proposals on unallocated sites. No additional evidence has arisen that would suggest that more provision is required, nor that any of the allocated sites has become unavailable.
- 5.39. The proposal for inert waste recycling at Kirkhouse Quarry (S7) was put forward for inclusion in Policy SAP2, but as explained in paragraph 5.27 above, dedicated inert waste recycling sites are more appropriately considered separately. The Site Allocations chapter of the MWLP Preferred Options (February 2015) takes a similar position on composting, as set out in paragraph 18.4 of that document.
- 5.40. The other three proposals put forward in this consultation (S3 Distington waste management facility and former landfill, S4 Flusco waste management complex and S5 Hespian Wood waste management complex) are all at existing permitted waste management sites, and represent either re-organisation of waste uses within the sites, further facilities within the existing planning application boundaries, or minor extensions of those boundaries. It is, therefore, not considered that a site allocation is appropriate in any of these situations.
- 5.41. As the proposed site allocations (S3, S4, S5) are already in use as waste management sites, any variations to facility type, intensity of use or minor boundary changes should be addressed through planning applications.
- 5.42. A further waste management or treatment facility already identified in the MWLP Preferred Options (February 2015) is Kingmoor Road Recycling Centre S11 (CA30). A planning permission for recycling waste at Kingmoor was first granted in 1995 and,

since that time, the extent and the use of the plant increased following the national drive to move away from landfill and adopt more sustainable forms of waste management.

- 5.43. A fire in 2014 completely destroyed the recycling plant and the building that accommodated it, and temporary locations have had to be found for the operations. The majority of CA30 covered the site that was operational at the time of the fire, but an additional area to the north of the site with planning permission was included in the CA30 boundary at the operator's request.
- 5.44. A slight revision to the boundary of the CA30 site allocation has been proposed as site S11, following the MWLP Preferred Options (February 2015) consultation. This would extend the allocation to the south east, to include the operator's offices that were associated with this site.
- 5.45. Unlike the proposals considered above, the area is no longer an active waste site, and therefore a time extension or minor boundary increase is not possible. A new planning application is likely to be submitted for the site, with a new building and reorganised facilities to provide a sorting, baling and transfer capacity within the Carlisle area. The allocation of the area that was previously in use is consistent with Strategic Policy SP3 in that the facility was, at the time of the assessments, providing a useful contribution to mixed recycling for the Carlisle area, and although the operations have continued as well as is possible at temporary locations, redevelopment of the site for waste use would maintain the capacity required for the area.
- 5.46. The area to the north of the previously operational waste site consisted of an unrestored industrial site with biodiversity value, including as a foraging, and probably hibernation site, for Great Crested Newts, as well as for an informal recreation area for the local community. Carlisle City Council has also allocated a site adjacent to the northerly section for housing. It is, therefore, considered that the boundary of CA30, as published in the MWLP Preferred Options (February 2015) consultation, should be amended to INCLUDE the area to the south now proposed, but EXCLUDE the area to the north, which was not previously part of the operational waste site.

6. Supporting Assessment Documents

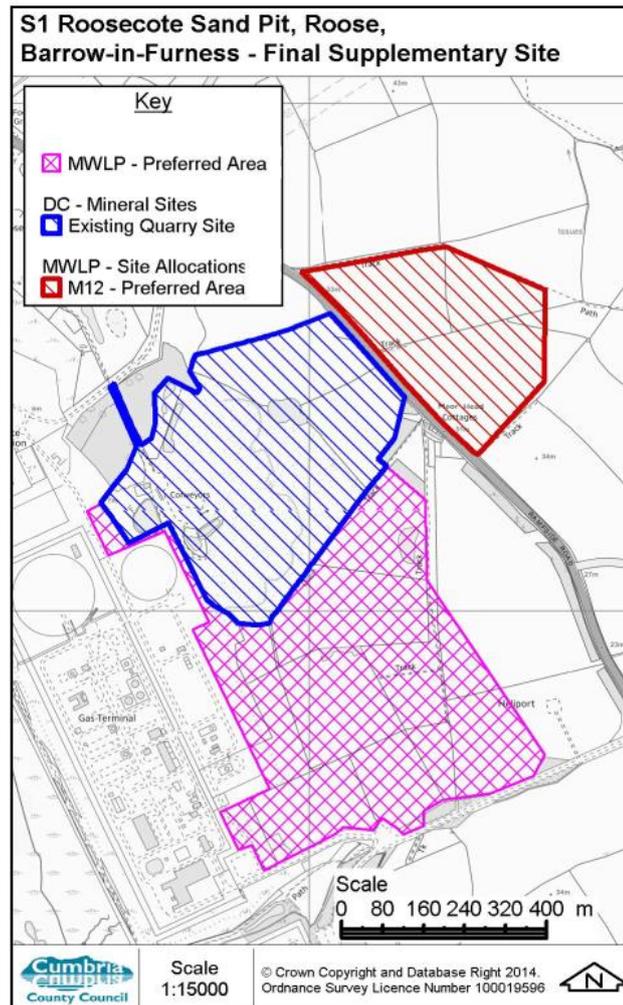
- 6.1. The County Council produced a Regulation 18 (Preferred Options) Site Assessments document that focused on the specific sites included in the Sites Allocations Policies section of the MWLP. The site assessment provided a mechanism for reviewing and scoring each of the proposed sites against the sustainability criteria and for assessing the likely environmental, social and economic impacts of each site. It allowed an in-depth and informed discussion to be held, where the context of each of the sites was analysed and assessed. A **Site Assessments** document has been prepared for this Supplementary Sites consultation.
- 6.2. Sustainability Appraisal is a statutory requirement for Development Plan Documents as set out in the Planning and Compulsory Purchase Act 2004. It is a systematic process used to assess the extent to which a plan or strategy will help to achieve relevant social, environmental and economic objectives, that reflect issues affecting the area where the plan will have an effect. If the plan or strategy also includes site allocations, these proposals are assessed using the same procedure and the Sustainability Appraisal also proposes ways of avoiding or reducing negative impacts of development. A **Sustainability Appraisal** of the newly proposed and amended sites has been prepared for this Supplementary Sites consultation.
- 6.3. The wildlife areas that are given the greatest level of protection from the impacts of development, by international and national legislation, are those that have been formally identified as European Wildlife Sites. These are designated as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Collectively, the SACs and SPAs form part of a European network of protected areas known as Natura 2000. Some of the SPAs were listed earlier under the Convention on Wetlands of International Importance; these are known as Ramsar sites.
- 6.4. All land use plans require Habitats Regulations Assessment in accordance with the Habitats Directive 92/43/EEC, enacted in the UK through the Conservation of Habitats and Species Regulations 2010. This is to identify any negative effects that they are likely to have on a European nature conservation site in view of its conservation objectives, either alone or in combination with other plans or projects.
- 6.5. Assessments are required to consider whether the plan would be likely to have a significant effect on any European site. The European Court has held that this means

that the risk of the effect occurring cannot be ruled out on the basis of objective information. A significant effect is one that could potentially undermine the site's conservation objectives. A **Habitats Regulations Assessment** of the newly proposed and amended sites has been prepared for this Supplementary Sites consultation

- 6.6. A copy of each of the supporting evidence documents and can be found on the Cumbria County Council website at: http://cumbria.gov.uk/planning-environment/policy/minerals_waste/MWLP/SiteConsult.asp

7. County Council Recommendations

S1 Roosecote Quarry



Summary from Sustainability Appraisal

The key mitigation requirement would be to protect the groundwater from any quarrying impacts. A programme of phasing would need to be agreed, in order to limit possible cumulative impacts with the existing quarry. The water bodies would require surveying for the presence of Great Crested Newts. Surveys also required for birds from the nearby Special Protection Area likely to use the site for loafing, feeding, etc. Other best practice mitigation measures appropriate to sand and gravel extraction would be required.

Summary from Habitats Regulations Assessment

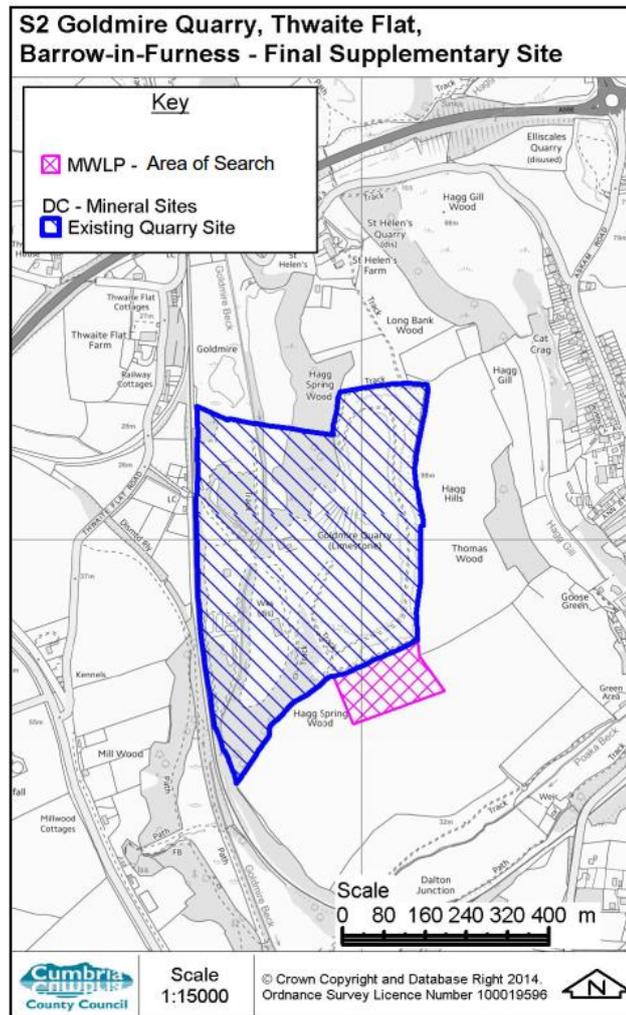
Assessment of Likely Significant Effect (ALSE)	Likely Effect
Appropriate Assessment	May adversely affect, alone or in combination with other proposals, the integrity of a European Site

Summary from Site Assessment document

Positive

Allocation sought			
Preferred Area for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals)			
Recommendation			
The County Council consider that this allocation for a Preferred Area SHOULD be included in the MWLP Site Allocations Policy SAP4			
Justification			
<p>The Site Assessment overall score is positive;</p> <p>The allocation of an additional area for sand and gravel extraction would provide further certainty about ongoing supplies in the south west of the county and is supported under Strategic Policy SP7 or SP8;</p> <p>The allocation of this area would also avoid sterilisation of mineral resources by enabling extraction of mineral in advance of possible non-mineral development.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S2 Goldmire Quarry



Summary from Sustainability Appraisal

Key mitigation includes controlling the level of dust and noise emissions reaching sensitive receptors. A programme of phasing would need to be agreed, in order to limit possible cumulative impacts with the existing quarry. Mitigation may be required to protect the groundwater from any quarrying impacts.

Summary from Habitats Regulations Assessment

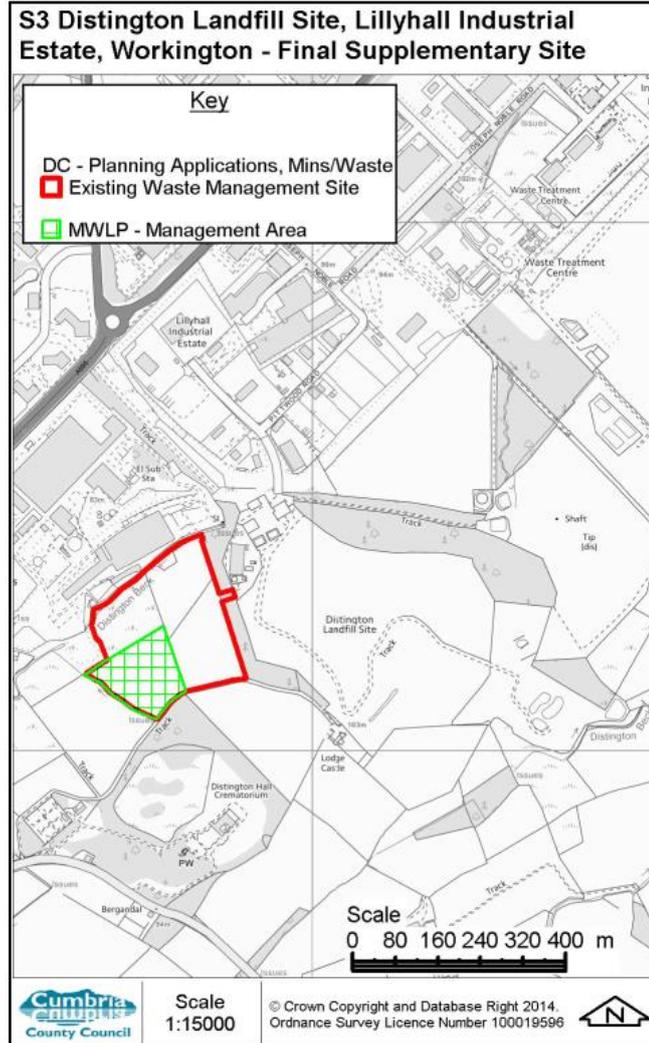
Assessment of Likely Significant Effect (ALSE)	NO likely significant effect
Appropriate Assessment	n/a

Summary from Site Assessment document

Positive

Allocation sought			
Area of Search for limestone extraction under Site Allocations Policy SAP4 (Areas for Minerals)			
Recommendation			
The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies			
Justification			
There are over 100 million tonnes of limestone reserves within Cumbria; The allocation would be inconsistent with Strategic Policy SP7 and is not indicated by Policy SP8; The issues would be more appropriately considered through a planning application			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

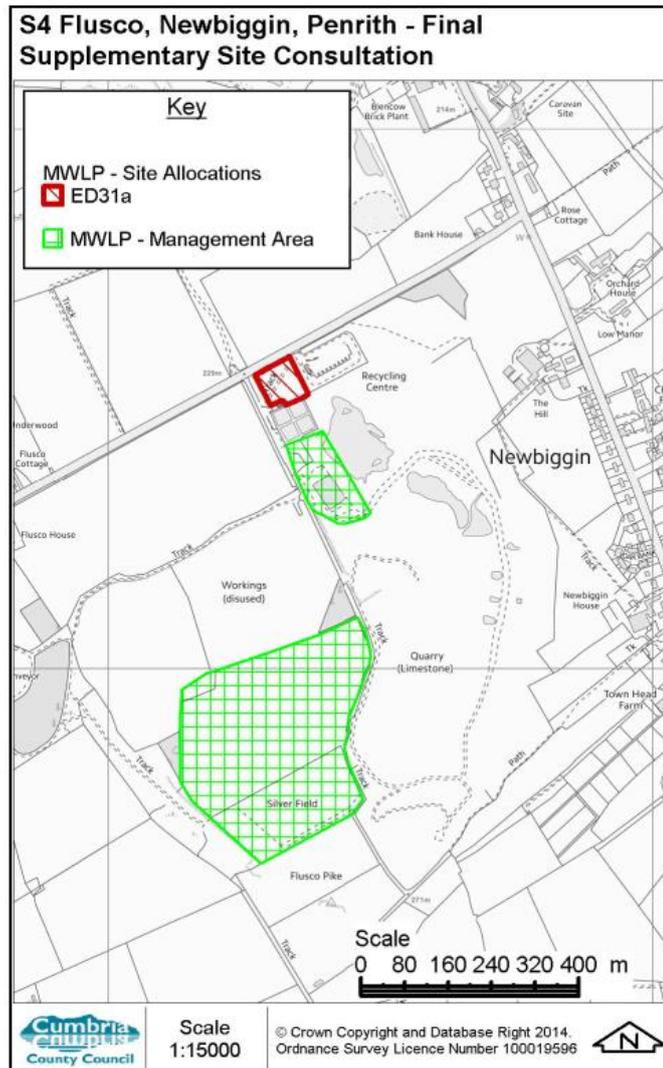
S3 Distington waste management facility and former landfill



Summary from Sustainability Appraisal	
Existing mitigation measures should be sufficient to deal with operational impacts, though a future planning application will need to provide evidence to this effect. Expansion of the facility towards housing, and into an area set aside in the existing facility's permission for screening and also for biodiversity connectivity and use, is likely to need mitigation. Surveys will be needed to check for use or occupancy of the extension land by any of the various local protected species. It would be advisable to evaluate the effect of water drainage off the site into Distington Beck and onto adjacent land, if this has not been done already.	
Summary from Habitats Regulations Assessment	
Assessment of Likely Significant Effect (ALSE)	NO likely significant effect
Appropriate Assessment	n/a
Summary from Site Assessment document	
Positive	

Allocation sought			
Increased area for waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)			
Recommendation			
The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies			
Justification			
<p>The site assessment overall score is positive, but the allocation would fall within the permitted area of an existing waste management facility; the site is, therefore, already in waste use and any issues would be more appropriately considered through a planning application.</p> <p>Note also that an additional allocation under Policy SAP2 is not indicated by any further evidence of need.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S4 Flusco waste management complex



Summary from Sustainability Appraisal

Existing mitigation measures should be sufficient to deal with operational impacts though a future planning application will need to provide evidence to this effect. In particular, consideration of cumulative impacts will need to be given to minimising the road traffic, emissions, dust, noise and visual impacts on residential properties nearby. Additional surveys may be needed to check for use or occupancy of the land by any of the various local protected species.

Summary from Habitats Regulations Assessment

Assessment of Likely Significant Effect (ALSE)	NO likely significant effect
Appropriate Assessment	n/a

Summary from Site Assessment document

Positive

Allocation sought			
1. Area for waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)			
Recommendation			
The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies			
Justification			
<p>The site assessment overall score is positive, but the allocation would fall within the permitted area of an existing waste management facility; the site is, therefore, already in waste use and any issues would be more appropriately considered through a planning application.</p> <p>Note also that an additional allocation under Policy SAP 2 is not indicated by any further evidence of need</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

Allocation sought

2. Area for inert waste recycling to be included as waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)

Recommendation

The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies

Justification

The proposal concerns only the relocation of an inert waste recycling area within the planning permission boundary of the quarry/landfill complex. The proposed site would be in the Silver Fields Quarry void and any issues that may arise would be considered through a planning application, and in particular under Policy DC9.

In addition, site allocation for inert waste recycling is not consistent with the terms of Policy SAP2, and a need for such allocations does not arise from Strategic Policies.

Do you consider that this site should be allocated in the Minerals & Waste Local Plan

YES		NO	
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Please state the reasons for your answer

S5 Hespun Wood landfill complex



Summary from Sustainability Appraisal

Existing mitigation measures should be sufficient to deal with operational impacts though a future planning application will need to provide evidence to this effect. If a planning application for an Energy from Waste plant on the site were to be submitted, consideration of airborne emissions in particular would need to be considered. Mitigation may also be required during such a plant's construction, especially if there were significant increases in traffic. There is insufficient information on drainage from the site and cumulative impacts from increased waste management operations – mitigation may be required. Surveys may be needed to check for use or occupancy of the land by any of the various local protected species.

Summary from Habitats Regulations Assessment

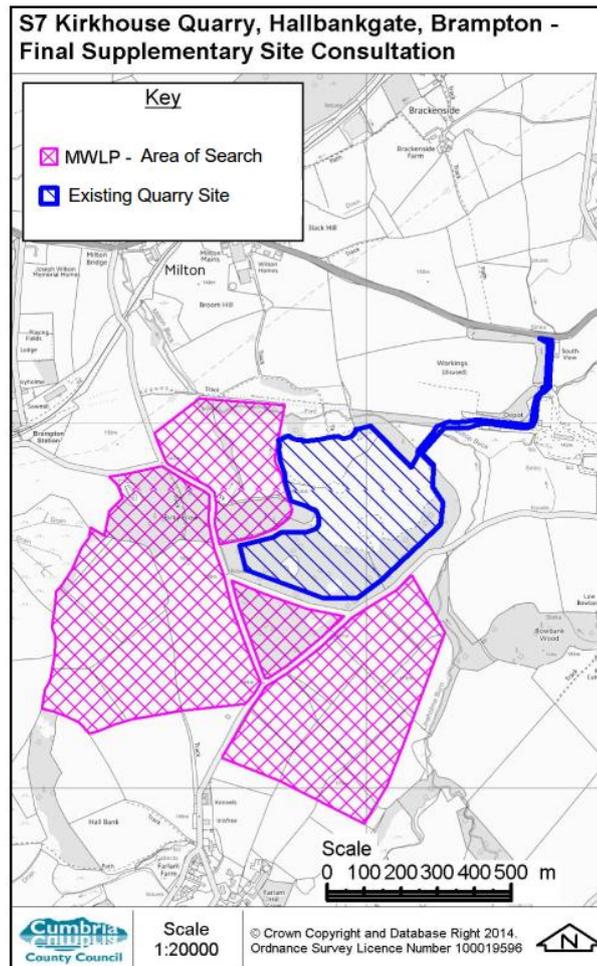
Assessment of Likely Significant Effect (ALSE)	Likely Effect
Appropriate Assessment	May adversely affect, alone or in combination with other proposals, the integrity of a European Site

Summary from Site Assessment document

Positive-Negative balance

Allocation sought			
Increased area for waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)			
Recommendation			
The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies			
Justification			
<p>The site assessment overall score is positive, but the allocation would fall almost entirely within the permitted area of an existing waste management facility; the site is, therefore, already in waste use and any issues about minor boundary extensions or a change in the type and impacts of the waste facility would be more appropriately considered through a planning application.</p> <p>Note also that an additional allocation under Policy SAP2 is not indicated by any further evidence of need, and Policy SP3 already gives in principle support to co-location of waste facilities on existing sites.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S7 Kirkhouse Quarry



Summary from Sustainability Appraisal	
Existing mitigation measures should be sufficient to deal with operational quarrying impacts, though a future planning application will need to provide evidence to this effect. This is assumed to include use of buffering, bunding, visual screening, noise suppression on compressors and other equipment, wheel washing and dust suppression during dry periods, etc. A programme of phasing would need to be agreed, in order to limit possible cumulative impacts with the existing quarry. Surveys may be needed to check for use or occupancy of the land by any of the various local protected species. Mitigation may be required for loss of woodland. Further consideration of cumulative impacts will need to be given to the proposal for inert waste recycling and inert waste landfill operations at the site; in particular, minimising the road traffic, emissions, dust, noise and visual impacts on residential properties nearby. A programme of phasing the sand and gravel extraction in order to provide a void space for the landfill, will be required.	
Summary from Habitats Regulations Assessment	
Assessment of Likely Significant Effect (ALSE)	Likely Effect
Appropriate Assessment	Would NOT adversely affect, alone or in combination with other proposals, the integrity of a European Site
Summary from Site Assessment document	
Positive	

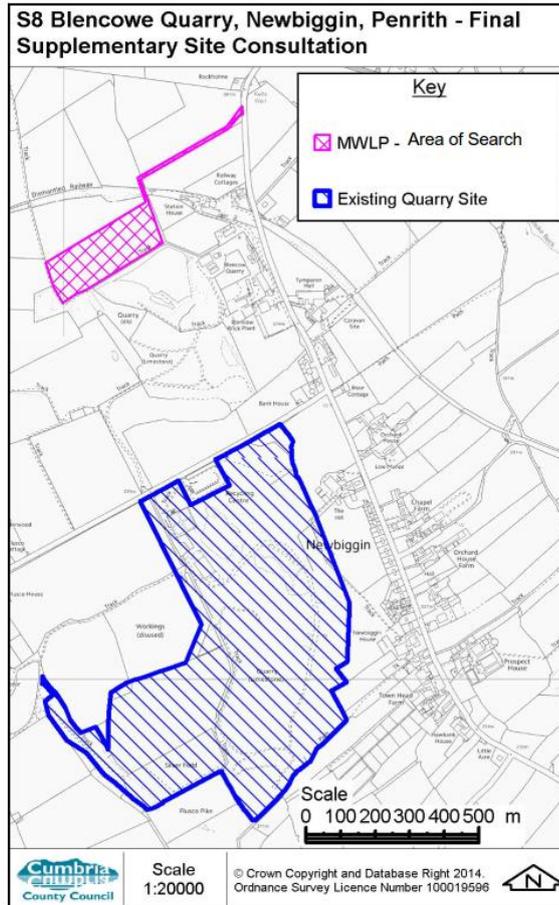
Allocation sought			
1. Area of Search for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals)			
Recommendation			
The County Council considers that this allocation SHOULD be included in the MWLP Site Allocations Policies under SAP4			
Justification			
<p>The Site Assessment overall score is positive; but the Area of Search is very extensive. The allocation would not support development of the entire area, and further site investigation would be required to select an area suitable to support ongoing extraction operations at a similar rate as the adjacent permitted quarry.</p> <p>The allocation of an additional area for sand and gravel extraction as an Area of Search would provide additional certainty about ongoing supplies in the county beyond the Plan period. The allocation of an additional area for sand and gravel extraction is supported under Strategic Policy SP7 or SP8. However, a smaller area would be sufficient to provide such certainty.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

Allocation sought			
2. New area for inert waste landfill			
Recommendation			
The County Council considers that this allocation SHOULD be included in the MWLP Site Allocations Policies; if so, an additional SAP policy would need to be included			
Justification			
Strategic Policy SP3 does not quantify a need for inert waste landfill, but an ongoing need in the county is recognised; the proposed additional capacity would be available in a timely manner because the quarry void is already excavated, and the landfill would			

<p>serve Carlisle and the north of the county.</p> <p>Minor amendments to Policy SP3 are already indicated as a result of representations on the MWLP Preferred Options consultation (February 2015) and a consistent approach to an allocation could be developed in the policy.</p>			
<p>Do you consider that this site should be allocated in the Minerals & Waste Local Plan</p>			
YES		NO	
<p>Please state the reasons for your answer</p>			

<p>Allocation sought</p>			
<p>3. New area for inert waste recycling under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)</p>			
<p>Recommendation</p>			
<p>The County Council do NOT consider that this allocation should be included in the MWLP Site Allocations Policies</p>			
<p>Justification</p>			
<p>A site allocation for inert waste recycling is not consistent with the terms of Policy SAP2, and, although the use is beneficial in principle, a need for such allocations does not arise from Strategic Policies.</p> <p>If an allocation for inert landfill is incorporated into the MWLP, as recommended above, then a planning application for inert waste recycling would be supported in principle under the terms of Policy DC9. This is considered to be the most appropriate way of considering the proposal.</p>			
<p>Do you consider that this site should be allocated in the Minerals & Waste Local Plan</p>			
YES		NO	
<p>Please state the reasons for your answer</p>			

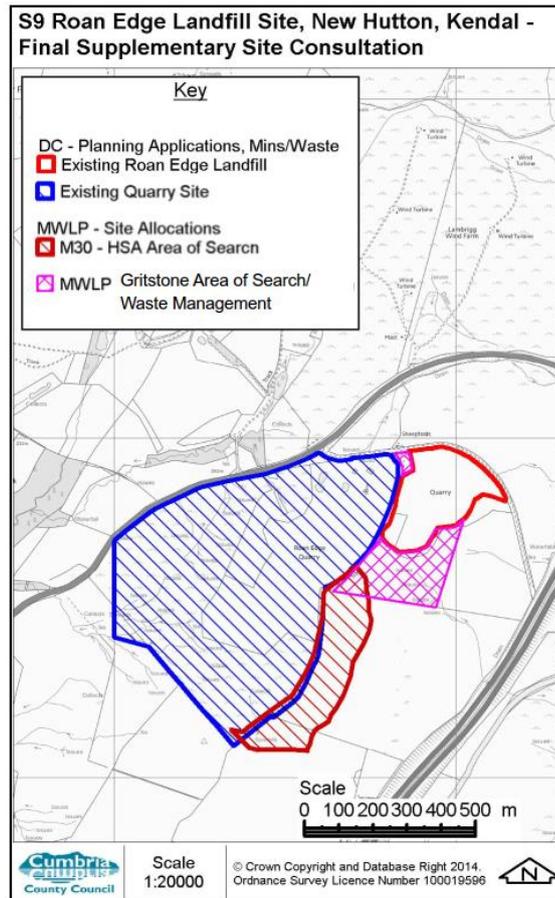
S8 Blencowe Quarry



Summary from Sustainability Appraisal	
<p>This would be a new quarry. Mitigation will be required to minimise the road traffic, emissions, dust and noise impacts, on the adjacent planned caravan park, on existing businesses along any lorry route and on the residents of Newbiggin. This is assumed to include use of buffering, bunding, visual screening, noise suppression on compressors and other equipment, wheel washing and dust suppression during dry periods, etc. Specific mitigation will be needed to deal with impacts.</p> <p>Surveys will be needed to check for the presence of Great Crested Newts and also a walkover of the railway corridor habitat to determine its biodiversity value. A programme of phasing would need to be agreed, in order to limit possible cumulative impacts with Silver Fields Quarry at the Flusco complex.</p>	
Summary from Habitats Regulations Assessment	
Assessment of Likely Significant Effect (ALSE)	Likely Effect
Appropriate Assessment	May adversely affect, alone or in combination with other proposals, the integrity of a European Site
Summary from Site Assessment document	
Positive-Negative balance	

Allocation sought			
Area of Search for limestone extraction under Site Allocations Policy SAP4 (Areas for Minerals)			
Recommendation			
The County Council do NOT consider that this site should be included in the MWLP site allocations			
Justification			
There are over 100 million tonnes of limestone reserves within Cumbria; and the allocation would be inconsistent with Strategic Policy SP7 and is not indicated by Policy SP8;			
The issues would be more appropriately considered through a planning application.			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S9 Roan Edge Landfill



Summary from Sustainability Appraisal

Further **extraction** of gritstone on the site is to provide a void space for increased capacity of inert waste landfill and also to eventually provide a larger platform on which to recycle greater amounts of inert wastes and produce more secondary aggregates. In the long term, it is not sustainable to continue digging a hole to provide a waste disposal route.

Consideration may need to be given to the effect of additional below-ground level working on the groundwater regime and also to the pattern of runoff down the slope to the east of the site. Measures to prevent contamination of the existing watercourses will need to be implemented. Mitigation will be required to minimise the road traffic, emissions, dust, noise and visual impacts of the operations. This is assumed to include use of buffering, bunding, visual screening, noise suppression on compressors and other equipment, wheel washing and dust suppression during dry periods, etc. Specific mitigation will be needed to deal with impacts.

Evidence of the sustainable use of the gritstone that it is proposed to extract on this site, may be required. Cumulative impacts with the adjacent high specification roadstones (HSA) quarry may need to be considered.

Existing mitigation measures should be sufficient to deal with impacts of the **waste** operations on site, though a future planning application will need to provide evidence to this effect. Measures would include mitigation for minimising the road traffic, emissions, dust, noise and visual impacts of the operations. Additional survey may be needed to check for use or occupancy of the extension land by any of the various local protected

species. It would be advisable to evaluate the effect of water drainage off the site, into the local watercourses and onto adjacent land, especially towards the motorway. Ecological survey of the site to check for use by protected species may be warranted. The bridleway/footpath running between the existing HSA quarry and the proposed site may need to be relocated.

Summary from Habitats Regulations Assessment

Assessment of Likely Significant Effect (ALSE)	NO likely significant effect
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Appropriate Assessment	n/a
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Summary from Site Assessment document

Negative for quarrying

Positive for inert waste landfill and recycling

Allocation sought

1. Area of Search for the extraction of gritstone under Site Allocations Policy SAP4 (Areas for Minerals)

Recommendation

The County Council do NOT consider that this site should be included in the MWLP site allocations

Justification

The landbank for non-HSA sandstone and igneous rock allocation currently stands at 79 years, and adequate provision (including Areas of Search) for HSA sandstone and igneous rock beyond 2040. Additional Areas of Search for either mineral are not required under Strategic Policy SP7 and provision of additional inert landfill capacity is not an adequate justification for such an allocation.

The allocation would also be contrary to Policy SP8, by potentially using the strategic regional resource for non-strategic purposes, and the overall site assessment score is negative. The issues would be more appropriately considered through a planning application.

Do you consider that this site should be allocated in the Minerals & Waste Local Plan

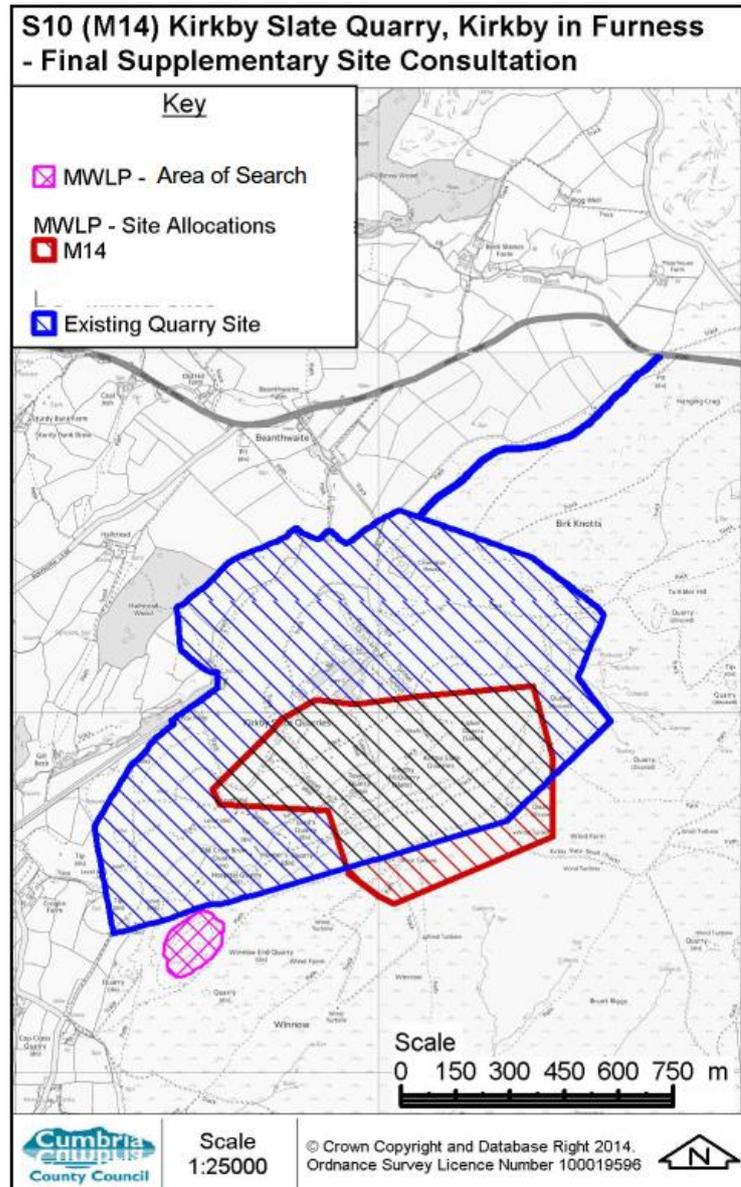
YES		NO	
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Please state the reasons for your answer

Allocation sought			
2. Extended area for inert waste landfill			
Recommendation			
The County Council do NOT consider that this site should be included in the MWLP site allocations			
Justification			
<p>Strategic Policy SP3 does not quantify a need for inert waste landfill, but although major infrastructure may give rise to an increased need, the proposed additional capacity would not be available in a timely manner because the quarry void has not yet been excavated.</p> <p>The submissions under previous planning applications on the site have emphasised the low demand for inert landfill in the South Lakeland area, as a reason for the slow rate of fill at the existing landfill and the need for time extensions for the permission. Any significant growth in inert arisings is predicted to be in West Cumbria, including Barrow, where adequate capacity already exists (at Goldmire Quarry).</p> <p>The planning permission for the current facility is due to expire in 2016 and a planning application for a time extension is expected. The overall site assessment score is negative, and given the interlinked issues of mineral extraction, landfill and recycling at this site, a planning application would be more appropriate than a site allocation.</p> <p>The minor amendments to Policy SP3 already indicated as a result of representations to the MWLP Preferred Options consultation (February 2015) would ensure that criteria for time extensions would apply to both inert and non-inert landfill time extensions.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

Allocation sought			
3. Extended area for inert waste recycling under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)			
Recommendation			
The County Council do NOT consider that this site should be included in the MWLP site allocations			
Justification			
<p>The planning permission for the current facility is due to expire in 2016 and a planning application for a time extension is expected.</p> <p>A site allocation for inert waste recycling is not consistent with the terms of Policy SAP2, and, although the use is beneficial in principle, a need for such allocations does not arise from Strategic Policies.</p> <p>The overall site assessment score is negative, and the submissions in support of this proposal do not provide sufficient evidence that an extended area is necessary for the efficient operation of the current recycling facility. Given the interlinked issues of mineral extraction, landfill and recycling at this site, a planning application would be more appropriate than a site allocation.</p> <p>If allocations for both mineral extraction and inert landfill were to be incorporated into the MWLP, against the recommendations above, then a planning application for an extension to the inert waste recycling site would be considered under the criteria of Policy DC9.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S10 (M14) Kirkby Slate Quarry



Summary from Sustainability Appraisal

No specific requirements other than the measures in use across the existing site. Any increase in surface water and soil/silt contamination from the infill and restoration of the former Winnow End Quarry would need to be addressed in the overall re-organisation of the Slate Quarry.

Summary from Habitats Regulations Assessment

Assessment of Likely Significant Effect (ALSE)	NO likely significant effect
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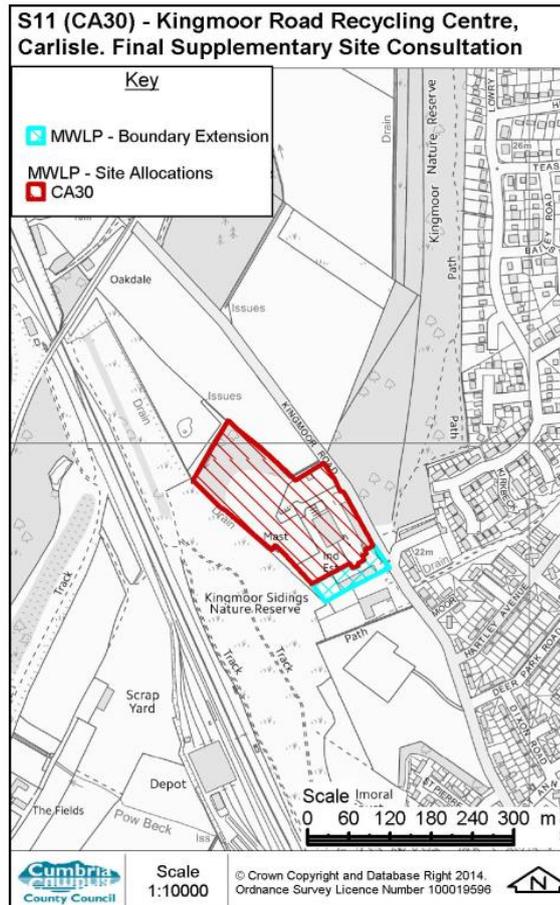
Appropriate Assessment	n/a
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Summary from Site Assessment document

Positive

Allocation sought			
Boundary change to Area of Search under Site Allocations Policy SAP4 (Areas for Minerals) to enable the infill and restoration of former Winnow End Quarry			
Recommendation			
The County Council do NOT consider that this site boundary should be amended in the MWLP site allocations			
Justification			
The proposal is to extend the Area of Search in order to facilitate infill and restoration, rather than for extraction, it is considered that this could be dealt with under the comprehensive planning application to be submitted for the quarry extension.			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

S11 (CA30) Kingmoor Road Recycling Centre



Summary from Sustainability Appraisal

Any increase in the throughput or change in the range of waste facilities, compared to the previous waste facility, should result in a review of mitigation measures for the intended future use. The inclusion of the additional land to the south would further increase potential throughput and associated traffic or noise. However, if the inclusion enabled the area of land to the north of the previous facility to be omitted from the development, leaving only the footprint of the former waste facility and offices, then the Great Crested Newt habitat could be left undisturbed. This would remove the need to secure compensatory habitat or for any occupants of the site to be relocated. A survey of the use of the site by protected species, following the period of inactivity caused by the fire, also appears advisable. Appropriate mitigation of land contamination risks, particularly in terms of disturbance and excavation of material that could then find its way into surface watercourses is also necessary, as is the need to prevent water running off the site and percolating into the soil beneath, carrying contaminants in solution into adjacent watercourses or uncontaminated greenfield land.

Summary from Habitats Regulations Assessment

Assessment of Likely Significant Effect (ALSE)	Likely Effect
Appropriate Assessment	Would NOT adversely affect, alone or in combination with other proposals, the integrity of a European Site

Summary from Site Assessment document

Positive-Negative balance

Allocation sought			
Boundary change to waste management/treatment area under Site Allocations Policy SAP2 (Waste Treatment and Management Facilities)			
Recommendation			
The County Council do consider that this site boundary SHOULD be amended in the MWLP site allocations			
Justification			
<p>The site as shown in the map above covers the previously operational site of the waste management facility including the office use, but excludes the northern extension in the previous site allocation. The northern section had introduced negative scores in both Site Assessment and Sustainability Appraisal because of its likely impact on Great Crested Newts, including breeding ponds just beyond the site boundary and the designated National Nature Reserve immediately to the west.</p> <p>A site allocation as an Area of Search under SAP2 would be consistent with the provision made for waste management and treatment required under Policy SP3.</p>			
Do you consider that this site should be allocated in the Minerals & Waste Local Plan			
YES		NO	
Please state the reasons for your answer			

ANNEX 1. Full text of Policies Referred to in Consultation

Set out below is the full text of each of the policies referred to in the Supplementary Sites consultation document, as currently drafted in the Cumbria Minerals & Waste Local Plan, Preferred Options, February 2015.

POLICY SP2 Provision for waste

Provision will be made for the management of all of Cumbria's wastes within the county, with the acceptance of limited cross boundary movements (net self-sufficiency). This will be achieved by allocating sufficient sites to meet objectively identified needs for additional facilities.

Any proposals to manage significant volumes of wastes from outside the county would have to demonstrate that the local, social and economic benefits outweigh other sustainability criteria.

These other criteria include the impacts of the additional "waste miles" and the principles of managing waste as close as possible to its source, with each community taking responsibility for its own wastes and taking account of the nearest appropriate facility.

POLICY SP3 Waste capacity

Waste Management Facilities

In order to provide an integrated network and to meet any waste capacity gaps that are predicted to arise during the Plan period, the Plan identifies:

- 8 sites of between 2 and 4ha for additional waste recycling and treatment facilities (these could provide for commercial and industrial waste or municipal waste);
- Broad Areas where any number of sites may be suitable for waste management;
- Alternative sites for those Household Waste Recycling Centres (HWRC) that are required to be replaced.

Preference will be given to sites that contribute to an integrated network of waste facilities by accommodating several types of facility, or by being well located in relation to the sources, or to the destination of, the waste stream being managed.

Proposals on unallocated sites, where opportunities arise that were not anticipated, will be considered if they conform to the other policies in this Plan and would meet an identified need in a timely manner.

The need for provision for construction and demolition, or excavation, waste arising from major infrastructure projects will be kept under review and proposals considered against relevant policies in this Plan.

Landfill

Time extensions for existing non-inert landfill facilities will be considered if they are necessary:

- to meet the capacity need identified in this Plan; or
- to achieve acceptable restoration contours; or
- to maintain an integrated network of a range of appropriate and necessary waste management facilities across the county.

Proposals for additional inert or non-inert landfill capacity would need to demonstrate that there is a need for the development and that it would not undermine the waste hierarchy.

Policy SP7 Minerals provision and safeguarding

Provision for potential further mineral working will be made by identifying Preferred Areas and/or Areas of Search:-

- to enable a landbank of at least seven years sales at the Local Aggregates Assessment level for sand and gravel and at least ten years for crushed rock to be maintained throughout the Plan period;
- for continued quarrying of nationally important very high specification roadstone and regionally important high specification roadstone;
- for continued quarrying of brickmaking mudstones;
- for continued quarrying of slate; and
- for continued extraction of gypsum.

Mineral resources will be safeguarded from being unnecessarily sterilised by other developments by identifying:-

- Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources (including high specification aggregates) and shallow coal resources identified by the British Geological Survey in its report “Mineral Resource Information for Development Plans - Cumbria and the Lake District: Resources and Constraints” (BGS Technical Report reference WF/01/02);
- Mineral Safeguarding Areas for the remaining gypsum resources;
- Mineral Safeguarding Area for identified resources of slate;
- Mineral Consultation Areas, which will include 250 metre wide buffer zones around the Mineral Safeguarding Areas.

Policy SP8 Strategic areas for new mineral developments

The **Kirkby Thore/Long Marton** area is identified as the location for further supplies of gypsum, if required towards the end of the Plan period.

Land next to **High Greenscoe Quarry** is identified as the location for further supplies of mudstones for the Askam in Furness brickworks.

The slates near **Kirkby Slate Quarry** are identified as the location for further supplies of slate.

The igneous rocks near **Ghyll Scaur Quarry** are identified as the location for further supplies of nationally important very high specification roadstone.

The sandstones near **Roan Edge Quarry** and **Holmescales Quarry** are identified as the locations for further supplies of regionally important high specification roadstone.

The sand and gravel resources in the **Roosecote** area and near **Peel Place Quarry** are identified as the location for further supplies of sand and gravel in the south west of the county.

POLICY SAP2 Waste treatment and management facilities (sites of around 2 to 4 ha)

AL3	Oldside, Workington
AL8	Lillyhall Waste Treatment Centre, Workington
AL18	Port of Workington
CA11	Willowholme, Carlisle
CA30	Kingmoor Road recycling centre, Carlisle
CA31	Kingmoor Park East, Carlisle
CO11	Bridge End Industrial Estate, Egremont
ED31	Flusco waste management site, near Penrith

POLICY SAP4 Areas for minerals

Preferred areas

M18	Stamphill, Long Marton, for gypsum
M12	Roosecote sand and gravel quarry extension, Barrow-in-Furness

Areas of Search

M5	land adjacent to High Greenscoe Quarry, near Dalton-in-Furness, for brickmaking mudstones
M6	land between Overby and High House sand and gravel quarries, near Abbeytown
M8	land adjacent to Cardewmires sand and gravel quarry, near Dalston
M10	land adjacent to Silvertop limestone quarry, near Brampton
M14	land adjacent to Kirkby Slate Quarry, near Kirkby-in-Furness
M15	land adjacent to Peel Place sand and gravel quarry, near Gosforth
M16	land adjacent to Holmescales high specification roadstone quarry, near Kendal
M17	land adjacent to Ghyll Scaur very high specification roadstone quarry, near Millom
M30	land adjacent to Roan Edge high specification roadstone quarry, near New Hutton

Sites for secondary or recycled aggregates facilities

In addition to existing recycling facilities at waste management sites and elsewhere, the hard rock quarries are considered to be suitable locations for processing alternative aggregates from their quarry wastes and from recycled aggregates.

ANNEX 2. Cumbria Local Aggregates Assessment Overview 2015

Cumbria and the Lake District National Park

Third Joint Annual Local Aggregates Assessment 2015 (incorporating figures for 2014)

1. The purpose of the annual Local Aggregates Assessment is for each mineral planning authority to assess the balance between the demand for and supply of aggregates. It should show whether there is a shortage or a surplus of supply. If there is a shortage, it should say how this is being addressed.
2. There are 14 working crushed rock quarries in Cumbria; two of these are partly within the Lake District National Park. There are 11 working sand and gravel quarries; none of these are within the National Park.
3. Cumbria is self-sufficient in aggregates and also supplies other markets in the North West, especially Lancashire, as well as other regions, especially the North East. Just under a third of Cumbrian quarries supply national markets, including Wales and Scotland.
4. The national policy criteria are that a minimum 7-year landbank should be maintained for land-won sand and gravel and a 10-year one for crushed rock. These should be based on the rolling average of 10 years annual sales data, whilst 3-year average annual sales can be used to identify trends.
5. In Cumbria, including the Lake District National Park, permitted reserves of **crushed rock** at the end of 2014, were 137.06 million tonnes (MT), 10-year average annual sales had been 3.25 MT, representing **a landbank of 42.17 years**. For land-won **sand and gravel**, permitted reserves were 9.20 MT, 10-year annual average sales had been 0.63 MT, representing **a landbank of 14.60 years**.
6. Landbanks within Cumbria for those aggregates that constitute **high and very high specification roadstones** have been considered separately from those for crushed rock for general use. The permitted reserve for these skid resistant roadstones, which supply national and regional markets, was **10.98 MT** with 10 year average sales of 0.64 MT, giving **a landbank of 17.71 years** at the end of 2014. A planning permission in early 2015 added a further 6.81 MT to the reserves.
7. The reserves for **crushed limestone for aggregate** purposes was **96.26 MT** giving a landbank of **42.59 years**, based on 10 year rolling average sales of **3.25 MT**.

8. Although the landbanks currently exceed the minimum requirements, additional resources are required for **sand and gravel**. Sales have substantially recovered following 4-5 years of lower sales, and the landbank would be 13.53 years on the basis of 2014 aggregate sales. If sales recovered to 0.8 MT, as in the 10 years from 2001-2011, the landbank would be only 11.5 years. This is recognised in the draft Cumbria Minerals and Waste Local Plan, through strategic policies and site allocations.
9. Time extensions for a number of sand and gravel quarries were granted during the calendar year 2014, and increased resources in the south and west of the county are also being considered in the draft Cumbria Minerals and Waste Local Plan. However, both issues need to be kept under review.
10. Further resources for **high and very high specification roadstones** are also advisable due to their regional and national significance, and this is addressed in the draft Cumbria Minerals and Waste Local Plan, through strategic policies and site allocations.
11. Limestone aggregate sales have not recovered as well as sand and gravel, with an 18% increase compared to 2013. However, the landbank for aggregate limestone would still be 14 years in 2030 even if average sales of 3 MT, last seen in 2001, were achieved for the entire period.
12. The supply of crushed limestone for industrial purposes is not covered in the landbanks considered above, and should be kept under review.
13. National policy requires that landbanks should, as far as practical, be maintained from outside National Parks and other landscape designations. This may constrain the supplies of crushed rock that Cumbria can make to other parts of the country in the future.
14. More detail on the aggregates assessment than is contained in this 'headline' document, is to be found in the 'Cumbria and Lake District National Park Joint Annual Local Aggregates Assessment 2015: Supporting Information', dated September 2015. This will be available shortly on both the Cumbria County Council and Lake District National Park Authority websites.

September 2015

ANNEX 3. Original Site Allocations and Amendments Proposed in Response to Regulation 18 Preferred Options Consultation (2015)

As discussed in paragraphs 4.2 to 4.4 of this Supplementary Sites consultation document, following discussion with the operators who had submitted representations for new or amended site allocations, several proposed allocations were withdrawn or amended.

Set out below are the original proposals for sites S3, S4, S5, S6 and S9. Sites S1, S2, S7, S8, S10 (M14) and S11 (CA30) remain unchanged.

