



Planning and Compulsory Purchase Act 2004

Town and Country Planning

(Local Planning) (England) Regulation 2012

Regulation 18 Consultation

Draft Cumbria Minerals & Waste Local Plan

2014 to 2029

Supplementary Sites Consultation

October/November 2015

Outcomes Report

January 2016

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.
- 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.

2. Consultation

- 2.1. In response to the Preferred Options consultation held in 2015, a small number of additional sites were put forward for consideration, as well as revised information for some sites that been included in the consultation. The Supplementary Sites Consultation document was produced to provide an opportunity for members of the public and other interested parties to provide comments on the new or revised information.
- 2.2. This was a 4-week focused consultation, solely on the additional and revised sites that were put forward for inclusion in the Cumbria Minerals and Waste Local Plan. The deadline for receiving responses was Monday 9 November 2015.

3. Responses to the Consultation

3.1. Twenty one responses were received to the consultation, from the following consultees:

- 001 - Workington Town Council
- 002 - Oxfordshire County Council
- 003 - New Hutton Parish Council
- 004 - Durham County Council
- 005 - Allerdale Borough Council
- 006 - Health and Safety Executive
- 007 - Old Hutton and Holmescales Parish Council
- 008 - South Lakeland District Council
- 009 - The Coal Authority
- 010 - Lake District National Park Authority
- 011 - National Trust: Planning team
- 012 - Historic England
- 013 - Brougham Parish Council
- 014 - Natural England
- 015 - Environment Agency
- 016 - United Utilities
- 017 – Centrica
- 018 - Carlisle City Council
- 100 - Cumbria County Council (Highways, Transport & Fleet)
- 101 - Cumbria County Council (Environment & Regulatory Services)
- 102 - Cumbria County Council (Emergency Planning Team)

3.2. Table 1 below sets out the consultation responses received and how they will be taken into account during the production of the next stage of the MWLP.

Table 1: Consultee comments

ID	Consultee	Comment	Action
No Comment			
001	Workington Town Council	The Town Council has no objections to the proposals in the Supplementary Sites Consultation.	Noted - no action required
002	Oxfordshire County Council	Oxfordshire County Council has no comments to make on this document.	Noted - no action required
004	Durham County Council	The Council neither wishes to support nor object to any of the proposed sites, noting that none of the proposed sites would have an unacceptable adverse impact upon either County Durham's environment or upon the amenity of its local communities.	Noted - no action required
006	Health and Safety Executive	We have concluded that we have no representation to make on this occasion. This is because the land allocated in your consultation document does not appear to encroach on the consultation zones of major hazard installations or major accident hazard pipelines.	Noted - no action required
009	The Coal Authority	Having reviewed the document, I can confirm that The Coal Authority has no specific comments to make on the supplementary sites proposed.	Noted - no action required
010	Lake District National Park Authority	We have considered the Minerals and Waste Local Plan – Supplementary Sites Consultation and on this occasion we have no comment to submit.	Noted - no action required
012	Historic England	At this stage we have no comments to make on its content.	Noted - no action required
013	Brougham Parish Council	Brougham Parish Council has no comment to make.	Noted - no action required
S1 Roosecote Quarry, Barrow-in-Furness			
014	Natural England	This site is 256 metres from Morecambe Bay SAC/SPA/Ramsar, 3.7km from Duddon Estuary SPA/Ramsar, and 2 other European Sites are within 5km. The HRA, under the heading of appropriate assessment, states: "could adversely affect, alone or in combination with other proposals, the integrity of a European Site." The HRA also	Noted - if a planning application comes forward careful consideration will be given to the impacts on the integrity of any European Sites

ID	Consultee	Comment	Action
		<p>states: “if compensatory habitat creation is required, there is no information as to whether such areas can be secured.”</p> <p>In the additional sites consultation document, the County Council recommends that this allocation should be included. Natural England would prefer not to see this site go forward; if it is included the County Council should have confidence that mitigation could remove impacts.</p>	<p>and appropriate mitigation measures will be put in place.</p>
016	United Utilities	<p>There is a rising main from Rampside skirting the terminal, which must be taken into account. We believe that this site may be a SSSI site, but not confirmed. There is also a private Pumping Station from the gas terminal on the outside of the perimeter of the site.</p>	<p>Noted – update Site Assessments document and SFRA, as necessary.</p> <p>Two SSSI’s are contiguous with the nearby SAC, SPA and Ramsar; there is no SSSI on the proposed site.</p>
017	Centrica	<p>The Supplementary Sites Consultation document proposes the allocation of the land edged pink on the plan as a Preferred Area for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals).</p> <p>This proposed allocation is in addition to the area edged red on the plan, which was proposed for allocation as a Preferred Area (Ref M12) in the spring 2015 consultation for the Cumbria Minerals & Waste Local Plan.</p> <p>The land proposed as a Preferred Area for sand and gravel extraction (edged pink) is located immediately to the east of HRL’s Gas Terminals and is owned by HRL. Accordingly, representations were previously submitted on behalf of Centrica and HRL strongly objecting to the Council’s previous proposal to allocate this land for sand gravel extraction in 2009, with the allocation not subsequently taken forward.</p> <p>Notwithstanding the existing license agreement with Roose & Walney</p>	<p>Objection submitted by planning consultant on behalf of landowner is noted.</p> <p>However, discussions are currently ongoing between the landowner and the quarry operator to resolve any issues and reach an agreement on the way forward.</p> <p>Sand quarrying has always been viewed as beneficial to both parties as it supports a local business through extraction of this important</p>

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		<p>Sand & Gravel Co. Ltd to quarry a small area of land within HRL's ownership (edged blue on the plan) for sand and aggregates, our clients continue to strongly object to the proposed allocation of a larger sand and aggregates site (edged pink) on the doorstep of the Gas Terminals. The reasons for this include the following:</p> <p>1. Current Use</p> <p>The land edged pink is already in use by Centrica/HRL for business critical activities as follows:</p> <ul style="list-style-type: none"> • Building associated with critical terminals activity known as the TCF (Temp Construction Facility), with the area housing key support contractors, ConocoPhillips team (who are housed to support the Rivers terminal) and contractors undertaking recent site based construction and demolition activity. This area is expected to be maintained as an area where key contractors and support groups are housed for the remaining 15 -20 years of the terminals operations, with 140 personnel housed in this area over last 12 months. • Accommodating car parking associated with the key contractors, ConocoPhillips, construction contractors and also for annual shutdown workers (30 – 120 motor vehicles). • A proportion of the land is designated to the helipad which requires a cordon sanitaire around the landing area and also a working envelope area should emergency services and support be required to attend the helipad area. • It is understood the sea-line gas line associated with the Rivers Terminal passes through land edged pink, with excavation in areas designated for sour sea-line gas transfer is not acceptable for Centrica/HRL, given the Health and Safety risks outlined in more detail below. 	<p>local resource – the next nearest sand and gravel quarry is some 40 miles away.</p> <p>A number of major infrastructure projects have been proposed for Cumbria including 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.</p> <p>It is therefore considered to be consistent with Policy SP7 to identify additional areas for sand and gravel extraction. It would also be consistent with Policy SP8 to allocate the proposed new site S1 Roosecote Quarry, for which there is confidence in volume and quality of resource.</p> <p>When British Gas (now Centrica) purchased the land to the south of the gas terminal, they requested that the</p>

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		<p>2. Health and Safety HRL's Gas Terminals are a top tier COMAH site with significant hazardous materials inventory and strictly controlled numbers of persons on site. Accordingly, locating quarry personal in closer proximity is unacceptable. Centrica staff all having specialist training and require protective equipment to be on site.</p> <p>Of particular note is the fact the land edged pink borders the Rivers Terminal, which is the area for handling sour gas. One of the top 10 Major accident hazards associated with the site is the rupture of a gas line on the Rivers Terminal releasing a gas stream containing 65% H2S concentration. The impact of this release and its dispersion is potential loss of life to persons operating within the dispersion contours/area, which include the land edged pink.</p> <p>Within the site boundary Centrica/HRL mitigate this risk and impact by MANDATORY wearing of Emergency Breathing Apparatus (EBA) suitable for life saving/breathing in such a release event. To assure similar protection within the land edged pink, such mitigation measures must be taken by persons undertaking work in proximity areas. This cannot be controlled by Centrica/HRL and is therefore a critical factor in our clients' objection.</p> <p>3. Security The increased number of staff, visitors and vehicle movements associated with an intensified quarry operation around the Gas Terminals would pose an increased risk to existing site security.</p> <p>4. Vibration and Dust Vibration and dust from quarrying activities in close proximity could affect the sensitive monitoring equipment on the operational plant at HRL's Gas Terminals.</p> <p>5. Noise Noise from HRL's Gas Terminals remains a sensitive community issue. The removal of the hillside through the proposed quarrying</p>	<p>planning condition, to landfill and restore the land to previous contours, was removed from the planning permission at that time. This was granted permission in 1993. Extraction of sand in the area put forward as S1, will provide Centrica with a platform of level ground for the further expansion of the gas terminal, should this be required in due course.</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>

ID	Consultee	Comment	Action
		<p>activities would entirely change the topography and existing noise screening would be lost.</p> <p>6. Flood Risk The removal of the hillside through the proposed quarrying activities would also affect rainfall distribution and groundwater. The water table is currently only around 1 metre below the surface and further land take has the potential to cause additional flood risk at the terminals.</p> <p>7. Access The quarry site is accessed via a blind corner on the same private road that serves as an emergency escape route out of HRL's Gas Terminals. As a result there have been previous near-misses on the access where lorries exiting the quarry site have nearly collided with Centrica/HRL staff and contractors. The potential expansion of the quarry operations as a result of the proposed allocation in such close proximity to HRL's Gas Terminals would exacerbate the existing situation and poses a significant risk to highway safety.</p> <p>8. Planning Policy The proposed sand and gravel extraction allocation would be contrary to the Saved Policies of the Barrow Local Plan (2001). In particular, Policy A12 – '<i>Energy Schemes Protection Policy</i>' of the Barrow Local Plan identifies a larger zone (including the land edged pink) for the generation and transmission of energy. Within this area, it is stated that any proposals that are not related to an energy industry or are contrary to the interests of an energy industry in the area will be refused.</p> <p>9. Constraining Future Development The proposed allocation of the land edged pink for sand and gravel extraction could act to constrain the future development of the land for energy related uses in accordance with the Barrow Local Plan allocation. Such energy related development is likely to result in new</p>	

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		<p>job creation, energy generation and other significant benefits, which should be supported by planning policy.</p> <p>It should also be noted that, the land edged pink forms part of the proposed North West Coast Connections Project Route Corridor. This is a key project to connect the electricity to be generated by new energy projects being built in Cumbria and Lancashire to homes and businesses across the wider area. It is therefore important that the allocation of the land edged pink does not constrain this project.</p> <p>In summary of the above, the proposed allocation of the land edged pink for sand and gravel extraction is considered incompatible with HRL's adjacent Gas Terminals and wider energy generation interests. Accordingly, the proposed allocation is considered contrary to the interests of the energy industry in the area and accordingly Saved Policy A12 of the Barrow Local Plan.</p> <p>It is therefore requested that the proposed allocation of the land edged pink (Ref. S1) as a Preferred Area for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals) is removed from the Cumbria Minerals & Waste Local Plan.</p> <p>Centrica and HRL reserve the right to amend or withdraw these representations if necessary.</p>	
100	Cumbria County Council <i>(Highways, Transport & Fleet)</i>	<p>The site is connected to the A5087 Principal route and well placed to provide for the needs of Barrow and the Furness area. Were there any intention to use this to supply to construction projects such as NuGen, the site should be rail connected (appears reasonably practicable) or output via Barrow Docks. Clearly the problem with the M12 Preferred Area is that it's the opposite side of the A5087 to the present operations. If the present processing operation were to remain on the western side, with the quarrying to the east, there would need to be a suitable crossing arrangement that doesn't have significant traffic impacts – e.g. operating hours restrictions, conveyor</p>	Noted – add information to Site Assessments document as necessary.

ID	Consultee	Comment	Action
		or bridging arrangement. However, given the emerging constraints with the MWLP 'Preferred Area'; allocating the area east of the A5087 would be preferable to having to import sand from outwith the area.	
102	Cumbria County Council <i>(Emergency Planning Team)</i>	Due to the close proximity of the Centrica Gas Terminal (an upper tier COMAH site) the CCC Emergency Planning Team would like to assess any potential effects on the Off Site Emergency Arrangements, which would occur under a planning application scenario.	Noted – information to be added to Site Assessments document, as necessary.
S2 Goldmire Quarry, Barrow-in-Furness			
011	National Trust	Generally agreed that there is no 'need' case to justify allocation of an additional area for limestone quarrying.	Noted – no action required
014	Natural England	The HRA rules out impacts on SPA birds, as S2 is 2.5km away. This decision should be backed up with supporting evidence to show that birds don't use land more than 2.5km from SPA.	Noted - if a planning application comes forward careful consideration will be given to the impacts on SPA birds and appropriate mitigation measures will be put in place.
016	United Utilities	This location is un-sewered.	Noted – information to be added to SFRA and Site Assessments document, as necessary.
100	Cumbria County Council <i>(Highways, Transport & Fleet)</i>	The site is a former rail-connected, understood disused, limestone quarry, which served the former steelworks – Thwaite Flat Road isn't considered suitable for major levels of HGV traffic, so support proposal that additional Area of Search shouldn't be allocated in the Plan.	Noted. The quarry is operational and is accessed via Thwaite Flat Road and the rail crossing. If an extension were granted permission, it would use the existing access and it may be appropriate to limit lorry movements via condition. Information to be added to Site

ID	Consultee	Comment	Action
			Assessments document, as necessary.
S3 Distington Waste Management Facility			
005	Allerdale Borough Council	We support the County Council's decision not to include an extension to the site as part of the Local Plan process. There is no evidenced need to identify further sites for waste management/treatment in addition to those sites identified in the February 2015 consultation. Given that the area identified for potential extension performs a key screening role for the current operations and contributes to a buffer zone for local residents, it is considered important to retain this.	Noted – no action required
016	United Utilities	There are no public sewers within the area under consideration; however, trade effluent discharges are made to the sewer from the existing waste disposal site. It is believed that there is no impact on the sewer network, however, there is the potential for increased trade effluent flows, which could impact on Parton WwTW.	Noted – information to be added to SFRA and Site Assessments document, as necessary.
100	Cumbria County Council (Highways, Transport & Fleet)	From a transport viewpoint, assuming the existing landfill access off Pittwood Rd were utilised, the site is well connected to the strategic route network; however, it's on the southern fringe of the industrial area, close to the crematorium and housing, which on balance, makes me feel the site is best not included in the MWLP allocation.	Noted – information to be added to SFRA and Site Assessments document, as necessary.
S4 Flusco Waste Management Facility, Newbiggin			
016	United Utilities	The nearest combined sewer is approximately 700m away.	Noted – information to be added to SFRA and Site Assessments document, as necessary.
100	Cumbria County Council (Highways, Transport & Fleet)	The northern site is well connected and adjacent to an existing facility, so I would tend to support this being allocated, though it would appear this could be dealt with by a normal planning application should the requirement arise. The site to the south west (Silver Fields) is in an area already the subject to a restoration programme and is adjacent to a BOAT (Byway open to all traffic), which would require significant	Agreed – 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

ID	Consultee	Comment	Action
		upgrading. I therefore recommend this element be not allocated.	appropriately considered through a planning application.
S5 Hespian Wood Waste Management Facility, Carlisle			
014	Natural England	<p>The HRA identifies possible adverse effect with this site. If this site is taken forward, Natural England would have concerns and would require the full mitigation details on how to avoid adverse effects.</p> <p>The possible impacts on European Sites are not given as justification for not wanting to take this site forward.</p>	<p>Noted – it is considered that any issues about minor boundary extensions or a change in the type and impacts of the waste facility on this site would be more appropriately considered through a planning application. Therefore, should a planning application come forward, careful consideration will be given to any adverse impacts and appropriate mitigation measures will be put in place.</p> <p>As Statutory Consultees, Natural England will be consulted on any future planning applications that may come forward on this site.</p>
016	United Utilities	There are no sewers nearby.	Noted – information to be added to SFRA and Site Assessments document, as necessary.
100	Cumbria County Council <i>(Highways, Transport & Fleet)</i>	From a transportation viewpoint, the site is well connected; but on the basis that there is no proven need, I concur with the approach that there is no need to allocate this area, but deal with it as a stand-alone planning application, should the need arise.	Agreed – the allocation would fall almost entirely within the permitted area of an existing waste management facility; the

ID	Consultee	Comment	Action
			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.
S7 Kirkhouse Quarry, Hallbankgate			
014	Natural England	The HRA identifies that mitigation is required to ensure no adverse effects. The site's consultation document says the County Council do wish to take this site forward. However, Natural England would expect to see the necessary mitigation appear in the policy wording.	<p>Noted - it is not appropriate to set out any necessary mitigation in the policy. The Site Assessments document sets out the possible environmental constraints on the site and the appropriate mitigation measures. Should a planning application come forward, careful consideration will be given to any adverse impacts identified and the appropriate mitigation measures will be put in place.</p> <p>As a Statutory Consultee, Natural England will be consulted on any future planning applications.</p>
016	United Utilities	Nearest sewer approximately 500m away.	Noted – information to be added to SFRA and Site Assessments document, as

ID	Consultee	Comment	Action
018	Carlisle City Council	<p>The City Council is concerned that the area of search includes large areas of existing woodland. The City Council has concerns about allocating such a large area of search, and the lack of certainty about where within this site the additional area for sand and gravel extraction is likely to be located. The area of search should be limited to those sites with the most capacity to be accessed from the existing quarry, and exclude the areas of woodland. The proposed site should also seek to minimise impact of additional traffic on the surrounding road network.</p> <p>The City Council has concerns about the level of increase of HGVs using local roads to deliver inert waste to this proposed landfill site. The need is identified as within the County. Therefore the site could potentially serve Carlisle and the north of the County. There is no evidence to indicate that the local road network could cope with this increase in traffic or the impact this is likely to have on nearby homes.</p>	<p>necessary.</p> <p>Noted. If this site were allocated for an Area of Search, it is expected that the extent would be much reduced from that proposed, by further site investigation.</p> <p>If an application came forward, careful consideration will be given to any adverse impacts identified and the appropriate mitigation measures will be put in place.</p>
100	Cumbria County Council (Highways, Transport & Fleet)	<p>The proposal is for the inclusion of a large 'search area' for minerals and takes in areas that would be better served by improvements to existing roads that would reduce the distance to the A69 T and, in particular, the levels of HGV traffic through Milton. On this basis, I would recommend the allocation of the areas immediately west of the existing quarry, but not south of the quarry and east of the Milton–Farlam road.</p> <p>With regard to the proposed allocation for inert waste landfill at the quarry, from a transportation viewpoint, no particular issues, particularly if dealt with as inbound loads on otherwise empty HGVs, assuming the quarry operations continue. On this basis, I'm minded to feel the site should be allocated.</p>	<p>Noted. If this site were allocated for an Area of Search, it is expected that the extent would be much reduced from that proposed, by further site investigation. If an application came forward and was granted for the inert landfill and inert waste recycling operations, there would need to be clear phasing of all operations.</p>
101	Cumbria County Council (Environment &	<p>Para S3.7 advises that archaeological work will be necessary on the site. However, the archaeological potential of the site is low and so I do not request archaeological work on this site.</p>	<p>Noted – Site Assessments document will be amended as necessary.</p>

ID	Consultee	Comment	Action
	<i>Regulatory Services)</i>		
S8 Blencowe Quarry, Newbiggin			
014	Natural England	The HRA identified possible adverse effect. The council does not wish to take this site forward, but doesn't mention HRA in justification for this.	Noted - the justification section of the consultation document concentrated on the policy context, whilst the SA, HRA and Site Assessments are stand-alone documents that draw their own conclusions; a summary of these is alongside the justification.
016	United Utilities	The nearest sewer is approx. 260m away but appears to be foul only and is likely to be unsuitable to accept any surface water runoff.	Noted – SFRA and Site Assessments document will be amended as necessary.
100	Cumbria County Council <i>(Highways, Transport & Fleet)</i>	This appears to be a northerly extension of a disused, flooded quarry. In the absence of a proven need for limestone locally, I agree the site shouldn't be allocated.	Agreed. This would be a new quarry, not an extension, as the disused quarry has planning permission for a caravan park.
S9 Roan Edge Landfill, New Hutton			
003	New Hutton Parish Council	1. <u>Area of Search for the extraction of gritstone under Site Allocations Policy SAP4 (Areas for Minerals)</u> New Hutton Parish Council believes that the extraction of more rock at this site to make a bigger hole in which to dump waste should not be allowed. The site is very exposed visually being near the skyline. The rock here is much more slaty than at the adjacent quarry and is not likely to be useful for roadstone or other worthwhile uses. 79 years reserve of supply for general uses is clearly sufficient without adding more.	Agree. The landbank for sandstone and igneous rock that is not used for high specification roadstone, currently stands at 79 years, and there is adequate provision (including Areas of Search) for sandstone and igneous rock used for high specification roadstone, beyond 2040.

ID	Consultee	Comment	Action
		<p>2. <u>Extended area for inert waste landfill</u> New Hutton Parish Council has always believed that there is sufficient room at this site for its operations.</p> <p>3. <u>Extended area for inert waste recycling under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)</u> New Hutton Parish Council has made several visits to the site in recent years as it can be clearly seen from the public right of way on its western boundary. It has always been evident that there is sufficient space for the current operation including space for piles of recycled material waiting to be sold.</p>	<p>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.</p> <p>Agree: the County Council has not identified a need for further inert landfill capacity.</p> <p>Noted. A site allocation for inert waste recycling is not consistent with Policy SAP2 and, although the use is beneficial in principle, a need for such allocations does not arise from Strategic Policies.</p>
007	Old Hutton and Holmescales Parish Council	<p>1. <u>Area of Search for the extraction of gritstone under Site Allocations Policy SAP4 (Areas for Minerals)</u> Old Hutton and Holmescales Parish Council notes that part of the parish looks right into the site even though it is in the neighbouring parish. It is concerned about further visual intrusion and agrees with CCC that more rock should not be quarried.</p> <p>2. <u>Extended area for inert waste landfill</u> Old Hutton and Holmescales Parish Council feels that the site is big enough already and members have never seen a shortage of spare space when they have looked into it from the footpath along the top of Roan Edge. The council agrees with CCC that the site should not be</p>	Noted - see comments above.

ID	Consultee	Comment	Action
		<p>included in the MWLP allocations.</p> <p>3. <u>Extended area for inert waste recycling under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)</u> Old Hutton and Holmescales Parish Council agrees with CCC's reasoning that the area should not be extended.</p>	
008	South Lakeland District Council	<p><u>Area of Search for Gritstone</u> - Support Cumbria County Council's recommendation.</p> <p><u>Extension to the area for inert waste landfill</u> - Support Cumbria County Council's recommendation.</p> <p><u>An extended area for inert waste recycling under Site Allocations Policy SAP2</u> - Support Cumbria County Council's recommendation.</p> <p>Any planning application to develop this site should be accompanied by an assessment of the impact of the development on traffic, dust, private water supplies, noise and vibration. Any adverse impact should be mitigated.</p>	Noted - no action required
016	United Utilities	The Roan Edge Quarry site (adjacent) has no sewers in the vicinity. The nearest sewer network is in Sedbergh or Grayrigg.	Noted – SFRA and Site Assessments document will be amended as necessary.
100	Cumbria County Council <i>(Highways, Transport & Fleet)</i>	Extended area of gritstone extraction and area for extended inert waste recycling. The site is accessed from the A684 between Kendal and M6 jct 37, so is well connected. Given the circumstances, it's considered these proposals should be dealt with by ordinary planning applications rather than being specific allocations.	Agreed.
101	Cumbria County Council <i>(Environment & Regulatory)</i>	Para S11.9 advises that archaeological work may be necessary on the site. However, the archaeological potential of the site is low and so I do not request archaeological work on this site.	Noted – Site Assessment document will be amended as necessary.

ID	Consultee	Comment	Action
	<i>Services)</i>		
S10 Kirkby Slate Quarry, Kirkby-in-Furness			
008	South Lakeland District Council	<p>Concern is expressed about the allocation request/proposal to infill Winnow End Quarry with inert material, as it may affect the existing private water supply in the vicinity. Due to the extensive quarrying operations, there are few reliable, good quality water sources and it is unlikely that a suitable alternative is available.</p> <p>The supply currently serves Longlands Holiday Park and is proposed to serve also Burlington Quarry offices, showroom and production facilities as the current supply to the quarry has been 'mined out' to the point that the supply is failing in terms of quality and sufficiency.</p> <p>Support Cumbria County Council's recommendation.</p> <p>Any planning application to develop this site should be accompanied by an assessment of the impact of the development on traffic, dust, private water supplies, noise and vibration. Any adverse impacts should be mitigated.</p>	Noted – Site Assessment document will be amended as necessary.
016	United Utilities	Potential to impact on Marshside Pumping Station, nearest sewers are at Chapels, should a connection be sought.	Noted – SFRA and Site Assessment document will be amended as necessary.
100	Cumbria County Council (<i>Highways, Transport & Fleet</i>)	Concur as with previous site, matters best dealt with by appropriate planning application rather than have site allocated.	Agreed.
S11 Kingmoor Road Recycling Centre, Carlisle			
014	Natural England	The HRA states that mitigation is required to avoid adverse effects. The County Council wish to take this site forward; therefore, it is essential that necessary mitigation is included in the policy.	Noted- it is not appropriate to set out any necessary mitigation in the policy.

ID	Consultee	Comment	Action
			<p>The County Council wish to take the southward extension of this site forward in the Local Plan but exclude the northern extension, which lies outside the permitted boundary of the previously operating facility.</p> <p>Discussion set out in the Site Assessment Report and the Sustainability Appraisal, leads to the conclusion that it would not be appropriate to continue to include the extension northward from the original permitted site.</p> <p>As a result of the exclusion of the northern extension, a number of the adverse impacts identified by the HRA can be avoided, particularly in relation to the Great Crested Newt habitat which can be left undisturbed. This removes the need to secure compensatory habitat or for any occupants of the site to be relocated. A survey for Great Crested Newts is likely to be requested if a planning application does</p>

ID	Consultee	Comment	Action
			come forward.
016	United Utilities	Combined sewer is located outside proposed facility. Surface water sewer for potential discharge is located approx 25m away.	Noted – add information to Site Assessments document and SFRA.
018	Carlisle City Council	<p>Please note: paragraph 5.46, first sentence, there is no evidence that the area referred to was part of the former Kingmoor Sidings, or was used for informal recreation by the local community. Second sentence, Carlisle City Council has not made any allocation for housing on the site to the north of CA30. Outline planning permission has been granted under reference 15/0595 for 65 dwellings. The land to the south of the Kingmoor Industrial Estate is allocated in the emerging Local Plan for the development of 100 houses.</p> <p>The site plan for CA30 is misleading, as it shows the existing site of the recycling centre, and the former proposed northern extension, whilst the text indicates that the map ‘excludes the northern extension in the previous site allocation’.</p> <p>The City Council would support the exclusion of the northern extension, in view of the planning permission for housing on the adjacent site.</p>	<p>Noted. Text within the Supplementary Sites Consultation document will be amended.</p> <p>Noted. The site Plan for CA30 will be amended.</p>
100	Cumbria County Council (Highways, Transport & Fleet)	I concur; if the allocation of this small area to the south of the present operations would obviate the originally proposed northern extension, this boundary amendment should take place.	Agreed.
102	Cumbria County Council (Emergency Planning Team)	Following the waste fire on 10 July 2014, it is requested by the CCC Emergency Planning Team that Cumbria Resilience Forum are made aware of any intended decisions to extend the site.	Noted – no action required in MWLP; however, DC Team will consult Emergency Planning if an application is submitted.

ID	Consultee	Comment	Action
General			
014	Natural England	<p>Overall both the HRA and SA need to be more robust, evidence based and detailed.</p> <p><u>Sustainability Appraisal</u></p> <p>1. Soils We are concerned that the Supplementary Sites Consultation document doesn't mention any reference to soils or land quality issues in the sustainability appraisal, which would appear to be a significant omission; especially for some of the larger site extensions, which based on available information, may well include land for BMV quality (Kirkhouse and Roosecote sand and gravel quarries).</p> <p>We would therefore welcome the County Council's confirmation that, where relevant, any additional site allocations would remain subject to the previously discussed Sustainability Appraisal (SA) Objectives; including NR3 "To Restore and Protect Land and Soil," which stated that "in order to avoid the loss of valuable BMV land, impacts on the soil environment will be minimised through effective implementation of the Strategic and Development Control Policies." We assume Policy DC21 (Protection of soil resources) would be the principal policy to apply in this context, with decisions being reached on the basis of a site specific soils and ALC survey information as recommended above.</p>	<p><u>Soils</u>: All constraints, including the potential for BMV quality land, are set out for each site in the Site Assessments report.</p> <p>The SA itself discusses BMV potential at site S7 (Appx 1, page 45) and scores it as "Likely moderate to significant adverse impact".</p> <p>For site S1, the SA discusses (Appx 1, p.8) the fact that good quality agricultural land could be lost, but explains that this loss may or may not be permanent, dependant on gas terminal expansion plans. It is scored "Possible mildly significant adverse impact".</p> <p>If an application were to come forward at this site before the Local Plan is adopted, soil protection would be considered under policy DC15 Protection of soil resources; once adopted, policy DC21 would be used.</p>

ID	Consultee	Comment	Action
		<p>2. Biodiversity The SA matrix identifies a possible negative impact on biodiversity for every site. There is a table that identifies mitigation needed for each site and on the whole it seems to rely on existing mitigation measures and the need for protected species surveys. It is unclear what the previous assessment comprised of. It appears that the natural environment is not being given full consideration, for example there is no mention about the loss of biodiversity in terms of trees/hedges/grasslands.</p> <p>S11 has a double negative score in the matrix for biodiversity, but when you look at the mitigation there is little proposed, given this is a site the County Council want to take forward, there should be more detail here. S11 is identified as an important ecological network between 2 Local nature sites and the proposed mitigation in the sites consultation document under the SA summary lacks detail, not giving adequate assurance that there will not be losses or impacts.</p> <p><u>HRA</u> Overall the HRA appears to consider the impacts adequately; however, it states that the conclusions have been based on limited information and a further HRA will be needed at application stage and, therefore, there is no need to rule out sites: S1/S5/S8. Natural England recommends the County Council have a certain level of confidence that the plan can be delivered.</p> <p>If S1 is to be taken forward, Natural England recommend the inclusion of some protective wording in the policy and it should state that an HRA is needed at application stage, but should also be able to identify mitigation sites or alternatives if affects are identified at application stage otherwise the plan may not be deliverable.</p>	<p><u>Biodiversity:</u> The Site Assessments Report provides details on any likely impacts on environmental assets including trees and hedgerows. Impacts on biodiversity would be given careful consideration should a planning application be submitted.</p> <p>S11 – noted; further text will be added to the site Assessment Report and Sustainability Appraisal to provide more detail on appropriate mitigation measures.</p> <p>S1 – noted; should an application come forward careful consideration will be given to any adverse impacts that may arise and appropriate mitigation measures will be put in place.</p> <p>The justification section of the consultation document concentrated on the policy context, whilst the SA, HRA</p>

ID	Consultee	Comment	Action
		<p>There is no evidence that the HRA findings have influenced the selection of sites that the County Council wish to take forward. There is a justification section under each site in the supplementary sites document, but HRA or Sustainability Appraisal (SA) are not mentioned.</p>	<p>and Site Assessments are stand-alone documents that draw their own conclusions; a summary of these is alongside the justification.</p>
015	Environment Agency	<p>We have reviewed the proposed minerals and waste sites included in the Supplementary Sites Consultation document and can comment as follows:</p> <p>Each of the proposed sites will need to be subject to a site specific hydrogeological assessment to determine their potential to impact the water environment and, therefore, the acceptability of the proposal. At this stage of the site allocation for mineral and waste developments, we do not have any objections in principle to the allocation of the proposed developments. However, each of the proposals will need to be supported by an adequate level of assessment at the planning application stage.</p> <p>For mineral extraction applications, there is normally a requirement to establish the relationship the development may have with groundwater resources. The level of maximum permitted excavation may be limited depending on groundwater levels and the presence of groundwater dependent features in the vicinity of the proposed sites. A monitoring scheme and mitigation measures may be required if the works are proposed near or below water table.</p> <p>The supplementary minerals and waste sites are within Flood Zone 1 (i.e. little or no fluvial/tidal flood risk).</p> <p>It is expected that waste activities such as the increased areas for waste management/treatment proposed within Distington Landfill,</p>	<p>Noted – add information to Site Assessments document and SFRA.</p>

ID	Consultee	Comment	Action
		<p>Flusco Landfill Site, Hespian Wood Landfill Site and Roan Edge Landfill, may require an environmental permit or variations to their existing permits and will be subject to assessment under the Environmental Permitting Regulations 2010.</p> <p>We understand that initial proposals for installation of solar panels on landfill sites were withdrawn and, therefore, South Walney Landfill is no longer considered in this submission.</p> <p>We would be happy to provide more specific comments on any of the proposed sites when they are brought forward to the planning application stage.</p>	

4. Next Steps

- 4.1. All comments received on the Supplementary Sites Consultation will be considered and the Council will revise the Local Plan as necessary. It is currently anticipated that a 'publication version' of the Local Plan will be consulted upon in spring 2016 and submitted to the Planning Inspectorate towards the end of 2016. We currently expect the Cumbria Minerals and Waste Local Plan to be formally adopted in 2017.
- 4.2. For ease of reference, a summary of the sites to be taken forward in the Local Plan and the sites that will not be taken forward, following the Supplementary Sites consultation, has been provided below:

Table 2: Sites to be taken forward

Site ID	Site Name	Allocation Sought	Reason for Allocation
S1	Roosecote Quarry	Preferred Area for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals)	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. The allocation of this area would also avoid sterilisation of mineral resources.
S7	Kirkhouse Quarry – Area of Search for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Minerals)	Area of Search for sand and gravel extraction under Site Allocations Policy SAP4 (Areas for Mineral).	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.
S11 (CA30)	Kingmoor Road Recycling Centre	Boundary change to waste management/treatment area under Site Allocations Policy SAP2 (Waste Treatment and Management Facilities)	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.

Table 3: Sites NOT to be taken forward

Site ID	Site Name	Allocation Sought	Reason for non-allocation
S2	Goldmire Quarry	Area of Search for limestone extraction under Site Allocations Policy SAP4 (Areas for Minerals)	The allocation would be inconsistent with Strategic Policy SP7 and is not indicated as necessary by Policy SP8.
S3	Distington Waste Management Facility and former Landfill	Increased area for waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)	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.
S4	Flusco Waste Management Complex	Area for waste management/treatment under Site Allocations SAP2 (Areas for Waste Treatment or Management)	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
		Area for inert waste recycling to be included as waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)	The proposed site would be in the Silver Fields Quarry void and any issues that may arise would be considered through a planning application. Site Allocation for inert waste recycling is not consistent with the terms of Policy SAP2.
S5	Hespin Wood Landfill Complex	Increased area for waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)	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
S7	Kirkhouse Quarry	New area for inert waste recycling to be included as	A site allocation for inert waste recycling is not

		waste management/treatment under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)	consistent with the terms of Policy SAP2.
		New area for inert waste landfill – this would require a new Site Allocations Policy	The consultation document recommended that this allocation should be identified in the MWLP, based on work carried out for the Waste Needs Assessment. A review of that document does not now identify the need; however, an application for inert landfill at this site could still come forward, and would be determined on the merits of the proposal. If a permission were granted, there would need to be clear phasing of all operations.
S8	Blencowe Quarry	Area of Search for limestone extraction under Site Allocations Policy SAP4 (Areas for Minerals)	The allocation would be inconsistent with Strategic Policy SP7 and is not indicated as necessary by Policy SP8.
S9	Roan Edge Landfill	Area of Search for the extraction of gritstone under Site Allocations Policy SAP4 (Areas for Mineral).	There is adequate provision for HSA sandstone and igneous rock beyond 2040. Additional areas of search are not required under Policy SP7.
		Extended area for inert landfill	Strategic Policy SP3 does not identify a need for further inert waste landfill capacity.
		Increased area for inert waste recycling under Site Allocations Policy SAP2 (Areas for Waste Treatment or Management)	A site allocation for inert waste recycling is not consistent with Policy SAP2.
S10 (M14)	Kirkby Slate Quarry	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.	It is considered that this could be dealt with under the comprehensive planning application to be submitted for the quarry extension.