



TOWN AND COUNTRY PLANNING  
(LOCAL DEVELOPMENT)(ENGLAND) REGULATIONS 2004

CUMBRIA MINERALS AND WASTE DEVELOPMENT FRAMEWORK

**APPENDIX 6 TO THE REGULATION 31 STATEMENT ABOUT REPRESENTATIONS**

**CORE STRATEGY REPRESENTATIONS BY ALL REPRESENTORS AGAINST SECTIONS**

JULY 2008

RGE/p.334/21



# Appendix 6. Representations about the Core Strategy against specific sections of the document.

Representor ID	Organisation	Surname	Representation number	Nature of Response	Examination(other = not specified)	RepresentationSummary	Test of Soundness
<b>Document</b>		<b>SUBMISSION DRAFT CORE STRATEGY</b>					
41	Natural England	Hedley	2695	Sound	written	We do not consider (the DPD) 'unsound' on the various tests of soundness. However areas of supporting text and wording in policies could still be improved.	
42	Environment Agency	Pickup	2633	Sound	other	Considers the Submission Draft Core document to be sound.	
54	Cumbria Action for Sustai	Suddaby	2576	Sound	other	Generally supportive of the whole document.	
56	One North East	Ritchie	2560	Soundness Not Specified	other	No comments to make.	
57	Northwest Regional Deve	Litt	2585	Soundness Not Specified	other	No specific comments	
102	The National Trust	Hubbard	2616	Sound	other	Generally supports the DPD .	
172	Preston Patrick Parish Co	Winter	2562	Soundness Not Specified	other	Supports the contents	
217		Klein	2816	Soundness Not Specified	written	Object to waste sites provision.	
285	Dalston Parish Council	Auld	2655	Soundness Not Specified	other	No comment	
299	Craven District Council	Gunn	2563	Soundness Not Specified	written	No comments to make.	
302	Scottish Borders Council	Frater	2559	Soundness Not Specified	written	No comments to make.	
321		Crookdake	2555	Unsound	written	Need to bring forward waste treatment plants, not continue landfilling.Other comments about pollution from attenuation ponds associated with M6 extension.	tosNone
344	North West Regional Ass	Entwhistle	2605	Soundness Not Specified	other	Documents are in general conformity with the draft RSS and the Secretary of State' proposed changes.	
471	Spectrum Interactive plc	Calder	2556	Soundness Not Specified	other	The company has no telephone Kiosks in the area at present.	
473	Preston Richard PC	Winter	2561	Soundness Not Specified	other	no observations to make	
476	Durham County Council	Oliver	2569	Soundness Not Specified	other	Welcomes general direction and offers support to the vision and strategic objectives.	
477	Eden District Council	Atkinson	2579	Sound	other	Eden DC supports the Cumbria MWDF Core Strategy.	
<b>Chapter</b>		<b>PREFACE</b>					
344	North West Regional Ass	Entwhistle	2606	Soundness Not Specified	other	Timescale complies with Policy EM13 of the Submitted Draft RSS .	
<b>Paragraph 1.4</b>		<b>It is considered that, for its spatial context, this Minerals and Waste Development Framework needs to to take account of the:-</b>					
27	United Utilities	Hardman	2785	Soundness Not Specified	other	Supports reference to United Utilities Asset Management Plans.	
187	Cumbria Wildlife Trust	Willshaw	2600	Sound	written	Change "bio-diversity" to biodiversity.	
256	Copeland Borough Coun	Hughes	2760	Unsound	written	Needs to take account of Copeland Local Plan and it's settlement boundaries as a principal criteria for locating urban-based facilities like HWRC. Needs complementary changes a) to the RJ for CS Policy 1 and b) to the contents of Table 7.1.	4A
256	Copeland Borough Coun	Hughes	2760	Unsound	written	Needs to take account of Copeland Local Plan and it's settlement boundaries as a principal criteria for locating urban-based facilities like HWRC. Needs complementary changes a) to the RJ for CS Policy 1 and b) to the contents of Table 7.1.	6
<b>Paragraph 1.5</b>		<b>Having had regard to all of these, the challenge for this plan is to provide for the sustainable minerals and waste management developments that will be needed in Cumbria by 2020 and b</b>					
27	United Utilities	Hardman	2786	Soundness Not Specified	other	United Utilities supports the reference to 'ensuring the prudent use of natural resources' e.g. sustainable use of drinking water and sustainable disposal of surface water.	
<b>Paragraph 2.16</b>		<b>A careful balance is needed between the Strategic Objectives and those of the Sustainability Framework. There can be tensions between these, for example, between protecting loca</b>					

Representor ID	Organisation	Surname	Representation number	Nature of Response	Examination(other = not specified)	RepresentationSummary	Test of Soundness
427	The Coal Authority	Bust	2708	Unsound	attend	Objective 8 fails Test 4 as it does not appear to take account of PPG14 and its contents. Should include need for addressing potential ground instability and reducing the future public safety issues as part of the high standards of restoration. Suggests improvement:	4B
427	The Coal Authority	Bust	2707	Sound	written	Supports Objective 7	
427	The Coal Authority	Bust	2706	Sound	written	Supports Objective 6	
<b>Chapter 3 DELIVERING THE OVERALL STRATEGY</b>							
41	Natural England	Hedley	2678	Soundness Not Specified	written	Welcomes expanded section on climate change.	
<b>Paragraph 3.7 Sewage treatment also produces methane and the United Utilities Asset Management Plan includes a continued programme for developing combined heat and power (CHP) plants using t</b>							
27	United Utilities	Hardman	2787	Soundness Not Specified	other	Supports reference to UU's CHP plants that address climate change .	
<b>Paragraph 3.19 Wastewater treatment can require high energy inputs, which reductions in water use can help to reduce. Whilst developments for waste water treatment are matters for this plan, it is cons</b>							
27	United Utilities	Hardman	2788	Soundness Not Specified	other	Supports comments on high energy inputs re waste water treatment. Notes also even more significant energy usage when surface water enters into the public foul/combined sewer. Agrees however that all these matters are more appropriate for District LDFs.	
<b>Paragraph 3.2 There are examples of policies in development plans about new developments gaining a significant proportion of their energy needs from renewable sources in accordance with PPS 1. Å</b>							
479	South Lakeland District C	Woodend	2611	Soundness Not Specified	written	Also mention that the RSS EiP panel recommended the 10% be raised to 15%.	
<b>Paragraph 3.28 It is proposed that the MWDF should contribute to securing overall reductions in greenhouse gas emissions by policies that:</b>							
41	Natural England	Hedley	2680	Soundness Not Specified	written	Want change to Para 3.28. Refer to letter of last December,: emphasis solely on tree-planting for 'carbon offsetting in this section is too limiting. Include nature conservation or sustainable agricultural land management as encouraged in Policy DC16.	
479	South Lakeland District C	Woodend	2612	Soundness Not Specified	written	Should read 'Require a proportion of the energy needs of new minerals and waste management developments to be met through renewable energy generation'.	
<b>Core Strategy Policy 1 SUSTAINABLE LOCATION AND DESIGN</b>							
41	Natural England	Hedley	2679	Soundness Not Specified	written	Woodland planting should not necessarily be singled out as the preferred afteruse to combat climate change, -soil resource protection and effective land management also have a significant role in combating climate change. see comments on Para 3.28.	
44	Aggregates Industries Ltd	Storey	2629	Unsound	attend	Should include a requirement to compare the environmental effects / sustainability of extending existing quarries with new ones.	7
256	Copeland Borough Coun	Hughes	2761	Soundness Not Specified	written	RJ for CS Policy 1 should refer to formally established settlement boundaries.	
344	North West Regional Ass	Entwhistle	2607	Soundness Not Specified	other	Policy complies broadly with Submitted Draft RSS Policy EM17 ' Renewable Energy. Refers to targets in table 11.6 and 11.7 a-c in Submitted Draft RSS.	
394	Stephenson Halliday	Edwards	2799	Unsound	attend	Amend policy to identify trigger levels and amend 3rd criterion to require minerals built development to similarly meet a proportion of their energy requirements from renewable sources.	7
486	Allerdale Borough Council	Ward	2660	Sound	written	Supported in principle	
493	Cemex UK Operations	Frost	2739	Soundness Not Specified	other	Criteria should be set in the context of the requirement to make adequate supply of minerals; bullet 1 should be reworded as ' 'have been considered as part of the design factors';bullet 2 should include economies of scale'; bullet 5 re. construction of buildings is not an appropriate objective for the MWDF.	
<b>Paragraph 3.3 Bearing in mind the very serious social and economic problems experienced by large parts of Cumbria, it is particularly important that best local advantage is taken ofÅ investments in mi</b>							
479	South Lakeland District C	Woodend	2613	Soundness Not Specified	written	Too strongly worded. Suggest the term very serious is removed and that problems, presumably low value economy and housing issues, are specified.	
<b>Core Strategy Policy 2 ECONOMIC BENEFIT</b>							
196	Barrow Borough Council	Huck	2698	Sound	other	Supports policy	
477	Eden District Council	Atkinson	2580	Sound	other	Core Strategy Policy 2 (Economic Benefit) is crucial in ensuring that the Core Strategy is sound, by protecting our communities, economy and environment from unnecessary harm [soundness Test 7].	
486	Allerdale Borough Council	Ward	2661	Sound	written	Supported in principle	
<b>Paragraph 3.41 There will be considerable increases in radioactive wastes managementÅ associated with nuclear decommissioning, and this will have social and economic impacts that need to be mitig</b>							
256	Copeland Borough Coun	Hughes	2765	Sound	attend	Should specify that packages under the Local Government Acts should be flexible and negotiated as joint arrangements driven by the host community.	

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<b>Core Strategy Policy 3</b>			<b>COMMUNITY BENEFITS</b>				
256	Copeland Borough Coun	Hughes	2766	Sound	attend	Support policy	
394	Stephenson Halliday	Edwards	2800	Unsound	attend	This policy should be deleted as issues should be addressed by individual proposals.	7
486	Allerdale Borough Council	Ward	2662	Sound	written	Supported in principle	
<b>Paragraph 3.43</b>			<b>Cumbria's environmental assets include the normal residential and work place amenities, or quality of life, that people enjoy and the natural and man made features for which the county is</b>				
187	Cumbria Wildlife Trust	Willshaw	2599	Sound	written	Change "eco-system" to ecosystem and mention ecosystem services.	
<b>Paragraph 3.44</b>			<b>Â The environmental assets are listed in the Boxes below. They include ones that have been formally designated in accordance with European and national legislation and others that are</b>				
89	Cumbria RIGS Group	Coffey	2657	Unsound	other	Insert additional bullet titled :- Cumbria Geodiversity Action Plan and include geodiversity action plan in Box 4.	7
102	The National Trust	Hubbard	2617	Unsound	written	Box 4 should be amended to specifically refer to Conservation Areas themselves and the settings of Registered Historic Parks and Gardens and of Scheduled Ancient Monuments.	4B
476	Durham County Council	Oliver	2570	Soundness Not Specified	other	Suggests document should recognise Moorhouse and Upper Teesdale SAC is partly within County Durham.	
<b>Paragraph 3.59</b>			<b>The policy is that development should not result in significant harm to Cumbria's environmental assets. If a particular proposal cannot reasonably be located on any alternative sites that w</b>				
187	Cumbria Wildlife Trust	Willshaw	2601	Sound	written	support	
<b>Core Strategy Policy 4</b>			<b>ENVIRONMENTAL ASSETS</b>				
39	English Heritage	Nelson	2697	Soundness Not Specified	other	Opposes qualification of "adverse effect" by juxtaposition of "unacceptable" or "significant". Suggests change in wording to use phrase "unacceptable impact".	
41	Natural England	Hedley	2681	Sound	written	Welcomes 'it is demonstrated there is an overriding need for the development' - now included in Policy.	
187	Cumbria Wildlife Trust	Willshaw	2602	Sound	written	Mention the Biodiversity Evidence Base.	
477	Eden District Council	Atkinson	2581	Sound	other	Core Strategy Policy 4 (Environmental Assets) is crucial in ensuring that the Core Strategy is sound, by protecting our communities, economy and environment from unnecessary harm [soundness Test 7].	
486	Allerdale Borough Council	Ward	2663	Sound	written	Supported in principle	
<b>Paragraph 3.61</b>			<b>Restoration and aftercare schemes for mineral working and waste management sites such as landfills,Â provide opportunities to secure the step-change increase in biodiversity resource</b>				
187	Cumbria Wildlife Trust	Willshaw	2603	Sound	written	Welcomes commitment to Cumbria Biodiversity Action Plan objectives and functional ecological networks	
<b>Core Strategy Policy 5</b>			<b>AFTERUSE AND RESTORATION</b>				
41	Natural England	Hedley	2682	Soundness Not Specified	written	Welcome much of paragraphs (3.61, 3.62 and 3.63). Maintain that our suggested policy title 'Reclamation and Afteruse; would be a more accurate and appropriate title.	
187	Cumbria Wildlife Trust	Willshaw	2604	Sound	written	Welcomes changes to prioritise biodiversity.	
394	Stephenson Halliday	Edwards	2801	Soundness Not Specified	attend	Incorporate clarification of the sustainability objectives and the weight to be attributed to them into this policy.	
427	The Coal Authority	Bust	2709	Unsound	attend	Policy CS 5 fails Test 4, no apparent account of PPG14 and is also poorly drafted and lacks clarity. See PPG14, paragraph 2 re. suitability of development, site physical constraints and scope for remedial, preventative or precautionary measures. See also MPS1 para 17 re land instability. Improvements suggested.	4B
472	Sebergham Parish Council	Gauntlett	2558	Soundness Not Specified	other	The PC believe that the fact that Parkhead Quarry has not been tidied in accordance to agreed proposals is pertinent to the plan.	
486	Allerdale Borough Council	Ward	2664	Sound	written	Supported in principle	
493	Cemex UK Operations	Frost	2740	Soundness Not Specified	other	Reword as follows: "â€¦demonstrate that the best practicable means has been taken to ensure that a site can help to deliverâ€¦"	
<b>Core Strategy Policy 6</b>			<b>PLANNING OBLIGATIONS</b>				
27	United Utilities	Hardman	2789	Sound	other	Welcomes point 1.	
41	Natural England	Hedley	2683	Soundness Not Specified	written	Wanted to add bullet: - 'secure protection and/or enhancement and the long term management of environmental assets' . Pleased that Generic Development Control Policies (DC 17) goes some way to covering this point.	
486	Allerdale Borough Council	Ward	2665	Soundness Not Specified	written	Supported - wish to emphasise that planning obligations should maximise benefits for the local community	

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493	Cemex UK Operations	Frost	2741	Soundness Not Specified	other	Clarify text and policy point 2 and 4 to restrict policy to issues directly related to development proposed and unachievable through normal planning controls. Add 'â€where these are directly related to the development being proposed'.at the end of the sentence:		
		<b>Paragraph 4.2</b>	<b>The Core Strategy includes the criteria for identifying broad locations and for allocating sites that would be in accordance with its policies.Â One of the main principles is that minerals sup</b>					
493	Cemex UK Operations	Frost	2742	Soundness Not Specified	other	In respect of minerals it should be acknowledged that it is not always practicable to locate mineral sites close to market areas, for instance geology will be a major factor in the location. The words where practicable and feasible should be added to this paragraph.		
		<b>Paragraph 4.5</b>	<b>Strategic areas can be identified for sand and gravel and for crushed rock.Â The Key Diagram at the end of this document shows their existing Mineral Consultation Areas. Detailed asses</b>					
481	Kier Mining	Richardson	2642	Unsound	written	BGS Coal resource maps as commissioned by the Coal Authority should be included in the CS Key Diagram and used later to identify the Mineral Safeguarding Areas for CSP14.	7	
		<b>Core Strategy Policy 7</b>	<b>STRATEGIC AREAS FOR NEW DEVELOPMENTS</b>					
41	Natural England	Hedley	2684	Soundness Not Specified	written	Refers to comments on High Greenscoe Quarry (letter-12/4/07).		
44	Aggregates Industries Ltd	Storey	2630	Unsound	attend	Amend policy to refer to NATIONAL importance of Ghyll Scaur Quarry for further supplies of very high specification road stone, and identify the area adjacent to Holmescales Quarry as an Area of Search to meet REGIONAL requirements.	7	
102	The National Trust	Hubbard	2619	Unsound	written	Objects -with reference to the area of South Whitehaven.	7	
196	Barrow Borough Council	Huck	2699	Sound	other	no objection to this policy		
344	North West Regional Ass	Entwhistle	2608	Soundness Not Specified	other	Areas for strategic waste facilities are broadly in accordance with those areas as identified in Table 7.1 of the Submitted Draft RSS.		
407	National Grid Land & Dev	Eyre	2653	Soundness Not Specified	other	Raises concerns about High Greenscoe Quarry and its proximity to Pennington to Sellafield gas pipeline.		
477	Eden District Council	Atkinson	2582	Sound	other	Notes that a Waste Transfer Station is proposed for the Penrith Area. EDC has already stated they have no objection to a particular planning application in the area.		
486	Allerdale Borough Council	Ward	2666	Soundness Not Specified	written	Policy supported provided there is a justified need for the development i.e. re impact of Allerdale sand and gravel quarries (and their traffic movements) on local communities.		
493	Cemex UK Operations	Frost	2743	Soundness Not Specified	other	Delete reference to the igneous rocks near Ghyll Scaur Quarry which is premature ahead of the site allocations document and proposals map.		
		<b>Paragraph 4.12</b>	<b>Cumbria has extensive coal resources, although the last deep mine closed several years ago and there are now no active opencast sites.Â There are no current proposals for further coal</b>					
481	Kier Mining	Richardson	2638	Unsound	written	Amend to state that there could be future proposals for coal mining in Cumbria, and that a minerals core strategy has been proposed for energy minerals to reflect their potential national importance. (See also changes suggested to CSP18 and paras in chapter 10.)	7	
		<b>Chapter 6</b>	<b>WASTE CORE STRATEGY</b>					
256	Copeland Borough Coun	Hughes	2775	Unsound	attend	Question whether it is better to wait a few months to allow a clearer picture to emerge following the Partial Review of the North West RSS.	9	
256	Copeland Borough Coun	Hughes	2775	Unsound	attend	Question whether it is better to wait a few months to allow a clearer picture to emerge following the Partial Review of the North West RSS.	7	
256	Copeland Borough Coun	Hughes	2775	Unsound	attend	Question whether it is better to wait a few months to allow a clearer picture to emerge following the Partial Review of the North West RSS.	4A	
		<b>Paragraph 6.26</b>	<b>WhatÂ all of the targetsÂ that have been set out aboveÂ have in common, is the need to reduce waste and then to reduce the amount and the proportions going to landfill. TheÂ waste</b>					
476	Durham County Council	Oliver	2571	Soundness Not Specified	other	Welcomes and supports the Waste Core Strategy.		
		<b>Paragraph 7.9</b>	<b>With regard to managing wastes as high up the waste hierarchy as possible,Â the hierarchy, as set out in national policy, has been refined in relation to recovery of value by energy from</b>					
102	The National Trust	Hubbard	2618	Unsound	written	The waste hierarchy should be encapsulated in the Core Strategy Policy	4B	
		<b>Core Strategy Policy 8</b>	<b>PROVISION FOR WASTE</b>					
38	WRG NW Division	Cook	2796	Unsound	written	Replace 'managing waste as close as possible to its source' with 'managing waste at the nearest appropriate installation'.	4B	
38	WRG NW Division	Cook	2797	Unsound	written	Suggests amended text about cross boundary movements of waste to make DPD sound wrt Test 6.	6	
196	Barrow Borough Council	Huck	2700	Sound	other	This policy is supported.		
344	North West Regional Ass	Entwhistle	2609	Soundness Not Specified	other	Policy is in broad accordance with adopted RSS policy EQ4 and Submitted Draft RSS policies EM10 & EM12		

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479	South Lakeland District C	Woodend	2614	Soundness Not Specified	written	Policy needs to be clearer. Small communities may not be able to host higher -level facilities.	
486	Allerdale Borough Council	Ward	2667	Sound	written	Policy supported.	
<b>Core Strategy Policy 9 WASTE CAPACITY</b>							
38	WRG NW Division	Cook	2798	Unsound	written	A clear justification is required for the figures stated within Policy 9 in order to make the document sound.	7
196	Barrow Borough Council	Huck	2701	Unsound	other	The Borough Council objects to 2 sites for energy from waste incinerators being included in case the County Council's preferred bid (for MBT plants for the Municipal Waste Contract) cannot be implemented.	tosNone
344	North West Regional Ass	Entwhistle	2610	Soundness Not Specified	written	The figures correspond to Table 11.3 and Table 11.5 of the Submitted Draft RSS.	
394	Stephenson Halliday	Edwards	2802	Unsound	attend	Identifies significant OMISSIONS from the DPD: clear figures and sources for the waste management requirements and landfill capacity figure; recognition of potential need for additional landfill capacity; guidance on what would constitute a shortfall or oversupply of capacity or voidspace; clear strategies on responses to oversupply or shortfalls .	7
486	Allerdale Borough Council	Ward	2668	Soundness Not Specified	written	Principle supported but concerns regarding the level of landfill proposed. policy emphasis should be to maximise recycling.Environmental impact of providing additional landfill sites should be fully addressed.	
<b>Paragraph 7.34 In addition to meeting basic requirements such as the size and shape of a site, the following criteria will be used for identifying locations and sites.</b>							
475	Appleby Town Council	Connell	2567	Sound	written	Would have preferred to see maps of any sites in the locality.	
<b>Table 7.1 Site location criteria</b>							
212	Carlisle City Council	Hardman	2729	Unsound	written	Table 7.1 Site location criteria is inconsistent with PPS9 as it does not cover species. Add reference to 'species' in the environmental interests.	4B
256	Copeland Borough Coun	Hughes	2763	Soundness Not Specified	written	Add new location criteria re settlement boundaries.	
<b>Paragraph 7.35 The broad locations of Carlisle and Workington/Whitehaven and Barrow in Furness and Kendal have been identified for strategic municipal waste management facilities in Policy 7. T</b>							
256	Copeland Borough Coun	Hughes	2767	Unsound	written	Considering planning applications for major new waste developments prior to Core Strategy Examination and publication of Site Allocations submission draft pre-empts proper consultation on siting options.	4B
256	Copeland Borough Coun	Hughes	2767	Unsound	written	Considering planning applications for major new waste developments prior to Core Strategy Examination and publication of Site Allocations submission draft pre-empts proper consultation on siting options.	9
<b>Chapter 8 RADIOACTIVE WASTES</b>							
346		Balogh	2759	Unsound	attend	Hosting a geological repository in Cumbria will leave an expensive and unwanted legacy for future generations.	7
346		Balogh	2759	Unsound	attend	Hosting a geological repository in Cumbria will leave an expensive and unwanted legacy for future generations.	6
346		Balogh	2759	Unsound	attend	Hosting a geological repository in Cumbria will leave an expensive and unwanted legacy for future generations.	9
449	CORE	Forwood	2738	Unsound	other	MWDF contains some inaccuracies - radiation doses reduced; ILW passively stored - or erroneous assumptions - co-disposal of new and legacy wastes; current, operational repository for spent fuel; volunteer before geology assessed.	7
457		Western	2780	Unsound	attend	Looking at available empirical evidence, the MWDF is too optimistic and confident concerning radioactive waste management - placing the people of Cumbria in jeopardy.	7
483	Sellafield Ltd	Manson	2632	Unsound	written	Request changes to paragraphs 8.2, 8.5 and 8.18.	9
483	Sellafield Ltd	Manson	2632	Unsound	written	Request changes to paragraphs 8.2, 8.5 and 8.18.	4B
485	Cumbria CND	Prettyman	2654	Soundness Not Specified	other	Concerned about radioactive pollution at Sellafield particularly leakage of plutonium waste.	
490	Wilkinson Environmental	Wilkinson	2781	Unsound	attend	The recommendations from CoRWM have been ignored or misinterpreted by Government, which, therefore, bases the MWDF Radioactive Waste policies on false premises.	7
494	NWAA	Blowers OBE	2733	Sound	attend	This chapter - based on voluntarism and partnership - presents a coherent and sound analysis. Definition of a community and 'affected' communities is important.	
<b>Paragraph 8.1 The UK has accumulated a substantial legacy of higher level radioactive wastes and more radioactive material will become waste over the next century or so as nuclear facilities are deco</b>							
496	Nuclear Waste Advisory	Mainwood	2751	Soundness Not Specified	attend	There are significant uncertainties about the impact of low levels of radiation exposure to people over long periods of time, such as during the operational life of a repository - this needs R&D.	
<b>Paragraph 8.2 Liquid high level waste, mostly from reprocessing, is stored to cool at Sellafield and is then subject to a process of vitrification. Most of the UK's Intermediate Level Waste is transferred i</b>							
483	Sellafield Ltd	Manson	2817	Unsound	written	This paragraph gives an incorrect impression of UK, and Sellafield in particular, ILW management. New wording is proposed.	9

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483	Sellafield Ltd	Manson	2817	Unsound	written	This paragraph gives an incorrect impression of UK, and Sellafield in particular, ILW management. New wording is proposed.	4B
491	Greenpeace UK	McSorley	2713	Unsound	attend	Explanation needed that, if the large amounts of both spent fuel and plutonium are designated as wastes, the nature of a deep geological repository will be altered.	7
<b>Paragraph 8.3 The Government requires organisations that have responsibilities for radioactive wastes to develop plans for their management. These "Integrated Waste Strategies" have to be prepare</b>							
491	Greenpeace UK	McSorley	2714	Unsound	attend	It is not clear how the decision-making processes and timelines of the NDA's IWS fit into the MWDF timeline.	8
491	Greenpeace UK	McSorley	2714	Unsound	attend	It is not clear how the decision-making processes and timelines of the NDA's IWS fit into the MWDF timeline.	7
<b>Paragraph 8.4 National policy for the long term management of these higher level wastes is still evolving, which presents difficulties for this plan. The County Council has supported the findings of the</b>							
491	Greenpeace UK	McSorley	2715	Unsound	attend	It is implied that international progress on deep geological repositories is more advanced than in actuality.	7
496	Nuclear Waste Advisory	Mainwood	2752	Soundness Not Specified	attend	Disposal does not remove, but creates, a burden for future generations. Public majority want retrievability, which is best achieved by storage, not phased disposal.	
<b>Paragraph 8.5 Disposal would be preceded by safe and secure interim storage until a deep repository can be developed. That storage period could be several decades. The Integrated Waste Strategy f</b>							
483	Sellafield Ltd	Manson	2818	Unsound	written	Although details were taken from the Sellafield Integrated Waste Strategy, repository opening dates will ultimately be on the instruction of the NDA.	9
483	Sellafield Ltd	Manson	2818	Unsound	written	Although details were taken from the Sellafield Integrated Waste Strategy, repository opening dates will ultimately be on the instruction of the NDA.	4B
491	Greenpeace UK	McSorley	2718	Unsound	attend	The MWDF fails to adequately consider and acknowledge the full range of issues relating to the disposal and storage of both legacy and new wastes.	9
491	Greenpeace UK	McSorley	2718	Unsound	attend	The MWDF fails to adequately consider and acknowledge the full range of issues relating to the disposal and storage of both legacy and new wastes.	7
<b>Paragraph 8.6 With regard to the size of facility that would be needed, it is estimated that nearly 500,000 cubic metres of packaged wastes, from existing facilities could, possibly, require geological disp</b>							
491	Greenpeace UK	McSorley	2722	Unsound	attend	Significant issues are ignored or not explained - the size of a deep geological repository, the wastes to be emplaced, the size of a new build programme, the definition of community. It is unclear whether the views of surrounding LAs were considered in the MWDF.	7
491	Greenpeace UK	McSorley	2722	Unsound	attend	Significant issues are ignored or not explained - the size of a deep geological repository, the wastes to be emplaced, the size of a new build programme, the definition of community. It is unclear whether the views of surrounding LAs were considered in the MWDF.	6
491	Greenpeace UK	McSorley	2722	Unsound	attend	Significant issues are ignored or not explained - the size of a deep geological repository, the wastes to be emplaced, the size of a new build programme, the definition of community. It is unclear whether the views of surrounding LAs were considered in the MWDF.	4C
491	Greenpeace UK	McSorley	2722	Unsound	attend	Significant issues are ignored or not explained - the size of a deep geological repository, the wastes to be emplaced, the size of a new build programme, the definition of community. It is unclear whether the views of surrounding LAs were considered in the MWDF.	4B
491	Greenpeace UK	McSorley	2722	Unsound	attend	Significant issues are ignored or not explained - the size of a deep geological repository, the wastes to be emplaced, the size of a new build programme, the definition of community. It is unclear whether the views of surrounding LAs were considered in the MWDF.	4A
<b>Paragraph 8.7 Government has broadly endorsed the CoRWM recommendations but has reserved its views on the detail of implementation. The UK Government and the devolved administrations for</b>							
496	Nuclear Waste Advisory	Mainwood	2754	Soundness Not Specified	attend	The lack of an adequate, Government-led, R&D programme into storage and disposal issues, plus their alternatives, may jeopardise public consensus on repository design and preclude any community volunteering as host.	
<b>Paragraph 8.8 Government policy on the implementation of the siting process is still evolving, it is difficult, therefore, to include detailed policies in this plan. However, it seems reasonable to assume tha</b>							
491	Greenpeace UK	McSorley	2725	Unsound	attend	HLW stores will be built with a 100 year lifetime, not 50 years. Cumbria should acknowledge that debate is required with communities outside the county on, e.g. transport of wastes.	7
491	Greenpeace UK	McSorley	2725	Unsound	attend	HLW stores will be built with a 100 year lifetime, not 50 years. Cumbria should acknowledge that debate is required with communities outside the county on, e.g. transport of wastes.	8
<b>Paragraph 8.9 The planning system itself is likely to be changed. In the Planning Bill, which was introduced in November 2007, the Government is proposing that decisions on nationally significant faci</b>							
491	Greenpeace UK	McSorley	2726	Unsound	attend	The MWDF should reflect the full range of views on the potential consent process of a geological repository.	9
491	Greenpeace UK	McSorley	2726	Unsound	attend	The MWDF should reflect the full range of views on the potential consent process of a geological repository.	7
496	Nuclear Waste Advisory	Mainwood	2756	Soundness Not Specified	attend	The outcome of the Planning Bill should not jeopardise the needs and concerns of the repository host community.	
<b>Core Strategy Policy 10 HIGH AND INTERMEDIATE LEVEL RADIOACTIVE WASTES STORAGE</b>							
256	Copeland Borough Coun	Hughes	2768	Unsound	attend	Cross reference to CS Policy 3 is needed to ensure that off-set community benefits packages are part of future storage approvals at Sellafield.	7

Representor ID	Organisation	Surname	Representation number	Nature of Response	Examination(other = not specified)	RepresentationSummary	Test of Soundness
455	West Cumbria & North La	Balogh	2744	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	9
455	West Cumbria & North La	Balogh	2744	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	3
455	West Cumbria & North La	Balogh	2744	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	7
484		Richards	2645	Unsound	written	CoRWMs recommendation to review the security of spent fuel storage above ground at existing sites, has been ignored by central Government, making the "compliance with national standards and best practice for environment, safety and security" difficult to establish.	tosNone
486	Allerdale Borough Council	Ward	2669	Sound	written	Principle supported	
491	Greenpeace UK	McSorley	2711	Unsound	attend	Clarity needed on both the definition of a community and which wastes the Council envisages will be stored at Sellafield. Suggested word changes to Policy 10.	7
491	Greenpeace UK	McSorley	2711	Unsound	attend	Clarity needed on both the definition of a community and which wastes the Council envisages will be stored at Sellafield. Suggested word changes to Policy 10.	8
<b>Paragraph 8.11</b>		<b>This plan does not propose the development of a geological disposal facility within Cumbria for the higher level wastes. It is not even known if there are areas of the county where the geol</b>					
256	Copeland Borough Council	Hughes	2769	Unsound	attend	Level of detail in these paragraphs and CS Policy 11 is inappropriate given current stage of national and regional strategies, including whether the repository is the most appropriate solution.	9
256	Copeland Borough Council	Hughes	2769	Unsound	attend	Level of detail in these paragraphs and CS Policy 11 is inappropriate given current stage of national and regional strategies, including whether the repository is the most appropriate solution.	4B
256	Copeland Borough Council	Hughes	2769	Unsound	attend	Level of detail in these paragraphs and CS Policy 11 is inappropriate given current stage of national and regional strategies, including whether the repository is the most appropriate solution.	7
491	Greenpeace UK	McSorley	2727	Unsound	attend	Greenpeace welcomes Cumbria's policy of not 'volunteering' Cumbria to host a repository.	tosNone
<b>Core Strategy Policy 11</b>		<b>HIGH AND INTERMEDIATE LEVEL RADIOACTIVE WASTE GEOLOGICAL DISPOSAL</b>					
29	South Lakeland Friends of	Sanders	2749	Unsound	other	The nuclear industry has based predictions of waste performance underground on incomplete research - until complete, waste should be packaged and stored above ground.	7
47	Friends of the EarthEngland	Crumpton	2764	Unsound	attend	Basing the establishment of a deep geological repository on poor science is unsound and waste disposal policy should be further researched. Attached file clarifies chemical considerations in nuclear waste burial.	6
47	Friends of the EarthEngland	Crumpton	2764	Unsound	attend	Basing the establishment of a deep geological repository on poor science is unsound and waste disposal policy should be further researched. Attached file clarifies chemical considerations in nuclear waste burial.	7
97	Friends of the Earth, 'WC	Perry	2750	Unsound	attend	Proposed disposal of HLW is based on the incorrect supposition of radioactive containment. Contamination of soil or water will lead to blight and hardship around the repository.	6
97	Friends of the Earth, 'WC	Perry	2750	Unsound	attend	Proposed disposal of HLW is based on the incorrect supposition of radioactive containment. Contamination of soil or water will lead to blight and hardship around the repository.	7
256	Copeland Borough Council	Hughes	2771	Unsound	attend	Further stages, once a local community wishes to withdraw from the process,should be refused consent or not considered. Also clarify the method of consultation for withdrawal.	9
256	Copeland Borough Council	Hughes	2770	Unsound	attend	The community benefits requirement should also be a prerequisite for Stage 1 development.	9
256	Copeland Borough Council	Hughes	2771	Unsound	attend	Further stages, once a local community wishes to withdraw from the process,should be refused consent or not considered. Also clarify the method of consultation for withdrawal.	7
256	Copeland Borough Council	Hughes	2770	Unsound	attend	The community benefits requirement should also be a prerequisite for Stage 1 development.	7
455	West Cumbria & North La	Balogh	2745	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	3
455	West Cumbria & North La	Balogh	2745	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	7
455	West Cumbria & North La	Balogh	2745	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	9
465		Davies	2762	Unsound	attend	The MWDF should only consider legacy wastes and maintain a clear distinction to new build wastes. Suggested alternative wording is given and a separate letter attached.	7
484		Richards	2646	Unsound	written	This policy fails the test of soundness on at least two counts - sustainability and that it is not based on robust and credible evidence. Three documents are supplied to support this view.	tosNone
486	Allerdale Borough Council	Ward	2670	Sound	written	Principle supported	
491	Greenpeace UK	McSorley	2728	Unsound	attend	It is vital that there is the right to public involvement in all stages of this process.	7
491	Greenpeace UK	McSorley	2728	Unsound	attend	It is vital that there is the right to public involvement in all stages of this process.	8

Representor ID	Organisation	Surname	Representation number	Nature of Response	Examination(other = not specified)	RepresentationSummary	Test of Soundness
<b>Paragraph 8.13</b>		<b>A substantial amount of work is being undertaken in conjunction with the Nuclear Decommissioning Authority and the other regulators in connection with geological disposal. Some of this</b>					
491	Greenpeace UK	McSorley	2730	Unsound	attend	This gives an erroneous impression that the NDA is a regulator. Although the policies should be flexible, they may require formal review and consultation to change. The Sustainability Appraisal may be based on false presumptions.	3
491	Greenpeace UK	McSorley	2730	Unsound	attend	This gives an erroneous impression that the NDA is a regulator. Although the policies should be flexible, they may require formal review and consultation to change. The Sustainability Appraisal may be based on false presumptions.	9
491	Greenpeace UK	McSorley	2730	Unsound	attend	This gives an erroneous impression that the NDA is a regulator. Although the policies should be flexible, they may require formal review and consultation to change. The Sustainability Appraisal may be based on false presumptions.	7
<b>Paragraph 8.19</b>		<b>The NDA's strategy and plans, together with the proposals of the new operator of the Repository, demonstrate that a very substantial proportion of the wastes that would, in the past, have</b>					
487	LLW Repository Ltd	Fisher	2776	Sound	other	Agree that a significant volume of Sellafield's contaminated land will become LLW or VLLW for disposal/storage at LLWR, but wish to add a sentence of clarification.	
<b>Paragraph 8.22</b>		<b>In these circumstances of much reduced projections of waste volumes that would be consigned to the Repository, the County Council accepts that it will continue to be an essential comp</b>					
487	LLW Repository Ltd	Fisher	2777	Sound	other	Consistent with the proposed changes to the NW RSS, support the LLWRs role in the UKs waste management capability and strategic aim.	
<b>Paragraph 8.23</b>		<b>The policy provides for the continued role of this Repository, but no other, within Cumbria. The NDA's strategy and plans are, by their nature, aspirational. It is essential that the assessme</b>					
425	SITA UK Ltd	Willshaw	2649	Unsound	attend	Fails soundness test 7 because alternatives to disposal at the LLW Repository near Drigg have not been considered.	7
425	SITA UK Ltd	Willshaw	2647	Unsound	attend	Paras 8.18 - 8.23 fail "flexibility" test of soundness as no alternatives to the LLWR near Drigg allowed during the plan period. Proposes amendments to enable an alternative facility for VLLW within reasonable proximity of the main source of waste at Sellafield.	9
487	LLW Repository Ltd	Fisher	2778	Unsound	other	Stating that the policy 'provides.....for no other in Cumbria', is inflexible for potential future needs and it is unclear which policy is referred to. Suggest rewording.	7
487	LLW Repository Ltd	Fisher	2778	Unsound	other	Stating that the policy 'provides.....for no other in Cumbria', is inflexible for potential future needs and it is unclear which policy is referred to. Suggest rewording.	9
<b>Core Strategy Policy 12</b>		<b>LOW LEVEL RADIOACTIVE WASTE</b>					
42	Environment Agency	Pickup	2634	Sound	other	Agree in principle with the wording but note that assessment of the feasibility of the long term integrity of the site is primarily a matter for the relevant regulator.	
256	Copeland Borough Coun	Hughes	2772	Unsound	attend	The nature of material from Sellafield that does NOT require 'multi-barrier containment" and therefore not consigned to the LLWR should be specified and safe storage/disposal clarified.	7
256	Copeland Borough Coun	Hughes	2773	Unsound	attend	Insufficient detail re. sea level rise and coastal erosion implications.	7
256	Copeland Borough Coun	Hughes	2774	Unsound	attend	The storage system should be required to enable retrieval of waste.	7
425	SITA UK Ltd	Willshaw	2650	Unsound	attend	Fails test of soundness 7.	7
425	SITA UK Ltd	Willshaw	2651	Unsound	attend	Fails test of soundness 6 because 1) it does not relate to the objectives in this DPD and 2) because it does not show how it addresses cross boundary issues (i.e. national role of LLW).Quotes volumes of LLW and LLW and argues for a new site at Keekle Head.	6
425	SITA UK Ltd	Willshaw	2652	Unsound	attend	Policy 12 and supporting paragraphs 8.18 to 8.23 fail test of soundness 4 by being contrary to the Governments objectives identified in 'Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom DEFRA 26 March 2007, and to also to PPS10 and Waste Strategy 2007.	4C
425	SITA UK Ltd	Willshaw	2648	Unsound	attend	Suggests criteria to evaluate planning applications for additional or alternative facilities to manage Very Low Level Waste.	9
425	SITA UK Ltd	Willshaw	2652	Unsound	attend	Policy 12 and supporting paragraphs 8.18 to 8.23 fail test of soundness 4 by being contrary to the Governments objectives identified in 'Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom DEFRA 26 March 2007, and to also to PPS10 and Waste Strategy 2007.	4B
425	SITA UK Ltd	Willshaw	2652	Unsound	attend	Policy 12 and supporting paragraphs 8.18 to 8.23 fail test of soundness 4 by being contrary to the Governments objectives identified in 'Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom DEFRA 26 March 2007, and to also to PPS10 and Waste Strategy 2007.	4A
455	West Cumbria & North La	Balogh	2746	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	3
455	West Cumbria & North La	Balogh	2746	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	7
455	West Cumbria & North La	Balogh	2746	Unsound	written	The evidence base has not been thoroughly examined and information supplied by the nuclear industry is overly optimistic. The Sustainability Appraisal is inadequate for radioactive material.	9
456	Nuclear Decommissionin	Fisher	2578	Soundness Not Specified	other	Welcomes the changes to the Core Strategy Policy 12 which reflect the national role for the Low Level Waste Repository..	

Representor ID	Organisation	Surname	Representation number	Nature of Response	Examination(other = not specified)	RepresentationSummary	Test of Soundness
483	Sellafield Ltd	Manson	2819	Unsound	written	Cumbria may be identified as a potential host to a new LLW repository, and Sellafield Ltd may want to make use of areas within the current Sellafield site to establish a LLW disposal facility.	9
483	Sellafield Ltd	Manson	2819	Unsound	written	Cumbria may be identified as a potential host to a new LLW repository, and Sellafield Ltd may want to make use of areas within the current Sellafield site to establish a LLW disposal facility.	4B
486	Allerdale Borough Council	Ward	2671	Sound	written	Supports the future role for LLWR, concerns re. coastal erosion and rising sea levels, and the requirement to reduce level of waste treated by this facility. Policy conforms to "Energy Coast" Masterplan principles.	
487	LLW Repository Ltd	Fisher	2779	Sound	other	In the second sentence, suggest replacing 'feasible' with 'acceptable'. In the third sentence, suggest omitting 'storage', as this criterion is not relevant.	
<b>Paragraph 9.4 There are fourteen active crushed rock quarries within Cumbria, three of these are partly within the Lake District National Park. Limestone, igneous and sandstone rocks are quarried. In a</b>							
427	The Coal Authority	Bust	2710	Unsound	attend	Fails Test 4 national policy (MPS1, MPG3); fails Test 7 as there is a lack of robust evidence on coal); and fails Test 9 flexibility (for changing energy requirements). Very disappointing that there is no reference to coal as a mineral in the overall strategy. Para 4.12 did refer to coal resources in Cumbria and that the situation will need to be kept under review but a more pro active stance should be taken. Improvement suggested : new paragraph on energy minerals (including coal) within the plan area.	4B
427	The Coal Authority	Bust	2710	Unsound	attend	Fails Test 4 national policy (MPS1, MPG3); fails Test 7 as there is a lack of robust evidence on coal); and fails Test 9 flexibility (for changing energy requirements). Very disappointing that there is no reference to coal as a mineral in the overall strategy. Para 4.12 did refer to coal resources in Cumbria and that the situation will need to be kept under review but a more pro active stance should be taken. Improvement suggested : new paragraph on energy minerals (including coal) within the plan area.	7
427	The Coal Authority	Bust	2710	Unsound	attend	Fails Test 4 national policy (MPS1, MPG3); fails Test 7 as there is a lack of robust evidence on coal); and fails Test 9 flexibility (for changing energy requirements). Very disappointing that there is no reference to coal as a mineral in the overall strategy. Para 4.12 did refer to coal resources in Cumbria and that the situation will need to be kept under review but a more pro active stance should be taken. Improvement suggested : new paragraph on energy minerals (including coal) within the plan area.	9
<b>Paragraph 9.12 The choices for the minerals strategy involved balancing:-</b>							
427	The Coal Authority	Bust	2712	Unsound	attend	Fails Test 4 no ref to PPG14 regarding unstable land. Omits reference to the need for appropriate restoration in line with PPG14. Suggests additional objective.	4B
476	Durham County Council	Oliver	2572	Soundness Not Specified	other	Supports Minerals Core Strategy.	
493	Cemex UK Operations	Frost	2747	Soundness Not Specified	written	Add to the Minerals Strategy 'in accordance with national and regional guidelines' to 1st Bullet point . Amend 3rd bullet to recognise that re-processing provision is required.	
<b>Chapter 10 DELIVERING THE MINERALS CORE STRATEGY</b>							
481	Kier Mining	Richardson	2641	Unsound	written	Suggests new section on Energy Minerals (paras 10.39 to 10.42) and amendments to para 10.39.	7
<b>Paragraph 10.2 It is proposed to identify areas in the Site Allocations Policies Development Plan Document and on the Proposals Map, although it may not prove necessary to identify all four different ty</b>							
481	Kier Mining	Richardson	2639	Unsound	written	The 'landbank' approach is not appropriate for energy minerals where 'need' does not have to be established.	7
<b>Paragraph 10.3 In accordance with national policy, an approach that does not include Preferred Areas has to be fully justified. In Cumbria, the existing planning permissions for general crushed rock</b>							
394	Stephenson Halliday	Edwards	2803	Unsound	attend	Does not support principal of NO crushed rock consents over plan period. Should be provision for extensions if proximity principle or particular needs of a operator/plant apply.	7
<b>Paragraph 10.2 The Region's apportionments of needs for the whole county are not the only figures which this plan takes into account. Because of the distinctive character of Cumbria and its dispersed r</b>							
394	Stephenson Halliday	Edwards	2805	Sound	other	Supports recognition that account needs to be taken of local supply patterns.	
<b>Paragraph 10.32 Representations stressed the need for stringent environmental safeguards, and that a new site should be phased in with the closure of the underground mine. Those points are accepte</b>							
41	Natural England	Hedley	2686	Soundness Not Specified	written	Welcome acceptance that stringent environmental safeguards will be necessary for any new sites. Soil resources points are addressed by Policy DC 15.	
477	Eden District Council	Atkinson	2584	Sound	written	Supports approach including this caveat.	
<b>Paragraph 10.39 There are extensive coal resources within West Cumbria but none of these are being worked. National energy policy and the need to mine coal will be kept under review. That could r</b>							
427	The Coal Authority	Bust	2719	Unsound	attend	Fails Test 4 - does not acknowledge coal as an important energy mineral ( MPS1 and MPG3) Paragraph 10.39 indicates that coal is classed as 'other mineral. Coal seems to have been downgraded to be included within the Generic DC Policies, DC Policy 7 (energy minerals). Suggests dividing chapter into energy and non energy minerals and include details re. coal.	4B
481	Kier Mining	Richardson	2640	Unsound	written	Not appropriate to merely keep coal under review as there is an increasing likelihood of surface coal mining proposals being submitted in Cumbria. Amend and expand to properly reflect the importance of coal and form the basis of a CS policy.	7
<b>Core Strategy Policy 13 SUPPLY OF MINERALS</b>							

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41	Natural England	Hedley	2687	Soundness Not Specified	written	Welcome target (min 25%) re secondary or recycled aggregates.	
394	Stephenson Halliday	Edwards	2804	Unsound	attend	Object to use of apportionment of 700,000 tpa sand and gravel in CS Policy 13, 900,000 more accurate. Approach to landbank not in accordance with MPS1 para 4.1, should be flexible to enable economic viability of sites.	4B
477	Eden District Council	Atkinson	2583	Sound	other	Agrees that stringent environmental safeguards will be necessary if gypsum reserves are to be worked by open cast methods.	
486	Allerdale Borough Council	Ward	2672	Sound	written	Principle supported, particularly the review to establish a link between local sand and gravel landbanks and local supply patterns.	
493	Cemex UK Operations	Frost	2748	Soundness Not Specified	other	The following wording should be added at the end of the 5th bullet: 'and to ensure that there is adequate provision by way of facilities to provide these materials'.	
<b>Core Strategy Policy 14 MINERALS SAFEGUARDING</b>							
41	Natural England	Hedley	2685	Soundness Not Specified	written	Ref: comments on High Greenscoe Quarry- letter dated 12 April 2007.	
44	Aggregates Industries Ltd	Storey	2631	Unsound	attend	Amend policy to include reference to the national importance of Ghyll Scaur quarry and an area of search adjacent to Holmescales Quarry.	7
196	Barrow Borough Council	Huck	2702	Sound	other	Supports allocation of land next to High Greenscoe Quarry for extraction of mudstone needed for brick production at Askam-in-Furness Brickworks.	
342		Cook	2815	Soundness Not Specified	written	Rejects need for additional sand and gravel extraction, particularly at Peel Place Quarry	
394	Stephenson Halliday	Edwards	2806	Sound	other	The safeguarding of mineral resources is welcomed and supported.	
427	The Coal Authority	Bust	2717	Unsound	attend	Fails Test 4 - inconsistent with MPS1, MPG3 re safeguarding coal. Fails Test 7 - coal is omitted from the evidence base . Fails Test 8 - implementability because safeguarding areas are not illustrated.	7
427	The Coal Authority	Bust	2717	Unsound	attend	Fails Test 4 - inconsistent with MPS1, MPG3 re safeguarding coal. Fails Test 7 - coal is omitted from the evidence base . Fails Test 8 - implementability because safeguarding areas are not illustrated.	8
427	The Coal Authority	Bust	2717	Unsound	attend	Fails Test 4 - inconsistent with MPS1, MPG3 re safeguarding coal. Fails Test 7 - coal is omitted from the evidence base . Fails Test 8 - implementability because safeguarding areas are not illustrated.	4B
481	Kier Mining	Richardson	2644	Unsound	written	Coal is sufficiently important to be included in CSP14, add a bullet point covering a Mineral Safeguarding Area for 'Coal and associated minerals.	7
486	Allerdale Borough Council	Ward	2673	Sound	written	Supported in principle.	
495	Confederation of UK Coal	Brewer	2783	Soundness Not Specified	written	CS Policy 14 should make reference to coal	
<b>Core Strategy Policy 15 MARINE DREDGED AGGREGATES</b>							
196	Barrow Borough Council	Huck	2703	Soundness Not Specified	other	Any increase in marine dredged aggregates should be accomplished in such a way so as not to affect the Barrow Port Regeneration proposals by, for example, transporting aggregate through proposed residential areas.	
486	Allerdale Borough Council	Ward	2674	Sound	written	Supported in principle.	
<b>Core Strategy Policy 16 INDUSTRIAL LIMESTONES</b>							
41	Natural England	Hedley	2688	Soundness Not Specified	written	Suggest it should state explicitly in the supporting text that national policies relating to developments within Areas of Outstanding Natural Beauty will apply where relevant.	
222	Friends of the Lake Distri	Pearse	2589	Unsound	written	As Shap Beck and Hartley Quarries lie within nationally designated landscape areas, we suggest changing the last paragraph to: "...AND environmental impacts can be appropriately mitigated", to conform to PPS7, paras 21 and 22.	4B
486	Allerdale Borough Council	Ward	2675	Sound	written	Supported in principle.	
<b>Core Strategy Policy 17 BUILDING STONES</b>							
130	Marshalls Natural Stone	Pearson	2565	Unsound	written	The policy is too inflexible because it fails to recognise that building stone is a regional commodity with established markets beyond Cumbria.Suggests changing the text of the policy to '... needed to maintain the regional distinctiveness of Cumbria and the surrounding counties'.	9
130	Marshalls Natural Stone	Pearson	2565	Unsound	written	The policy is too inflexible because it fails to recognise that building stone is a regional commodity with established markets beyond Cumbria.Suggests changing the text of the policy to '... needed to maintain the regional distinctiveness of Cumbria and the surrounding counties'.	7
394	Stephenson Halliday	Edwards	2807	Sound	other	Welcomes recognition for necessity of building stone quarries .	
486	Allerdale Borough Council	Ward	2676	Sound	written	Supported in principle.	
<b>Core Strategy Policy 18 OIL AND GAS and COAL BED METHANE</b>							

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427	The Coal Authority	Bust	2720	Sound	written	Policy CS18 is a positive policy.	
481	Kier Mining	Richardson	2637	Unsound	written	CSP18 be amended to 'ENERGY MINERALS and to read Planning permission will be granted for proposals associated with the exploration and development of onshore and offshore energy minerals in appropriate locations, and which do not have unacceptable environmental impacts.	7
486	Allerdale Borough Council	Ward	2677	Sound	written	Supported in principle.	
<b>Table 11.1 Monitoring matrix</b>							
60	Government Office for the	Bamber	2574	Sound	written	The table should clearly identify those responsible for carrying out the actions referred to in order to meet soundness test viii, not considered to compromise overall soundness.	
492	Quarry Products Associat	Bromley	2734	Unsound	attend	The figures given in table 11.1 for sand and gravel show that the sand and gravel landbank (13.1 years) will fall below the required minimum before end of the plan.	4B
<b>Paragraph 11.14 Defra has also proposed (July 2007) a local authority performance indicator for Improved Local Biodiversity. This would measure the proportion of local sites where a positive biodiversity</b>							
187	Cumbria Wildlife Trust	Willshaw	2615	Sound	written	Refer to biodiversity indicator (NI197: Improved Local Biodiversity - proportion of Local Sites where positive conservation management has been or is being implemented)	
<b>Chapter II KEY DIAGRAM</b>							
427	The Coal Authority	Bust	2716	Unsound	attend	Fails Test 6 - inconsistent within DPD & Fails Test 7 re. evidence base. West Cumbria coalfield notified consultation area is referred to in para 4.12 but not on the Key Diagram. MCAs for other minerals are part based on out of date (1982) evidence (test 7).	7
427	The Coal Authority	Bust	2716	Unsound	attend	Fails Test 6 - inconsistent within DPD & Fails Test 7 re. evidence base. West Cumbria coalfield notified consultation area is referred to in para 4.12 but not on the Key Diagram. MCAs for other minerals are part based on out of date (1982) evidence (test 7).	6
481	Kier Mining	Richardson	2643	Unsound	written	See comments on para 4.5.	7
495	Confederation of UK Coal	Brewer	2782	Soundness Not Specified	written	Applications to work coal are increasingly probable so the key diagram on Minerals Consultation Areas should include coal.	