This is in response to the Main Matter 3 of the Inspector’s Main Matters, Issues and Questions (document reference ED50)
Question 3.1

1. Despite the County Council calling for sites in the south of the county, from 2005 onwards, the only sites that came forward for consideration were BA23 Bennett Bank and BA10 Goldmire.

2. Bennett Bank in the south, AL31 at Lillyhall in the west and CA24 north of Carlisle, are established landfill sites and, in accordance with our site location sequential approach (in line with RSS Policy EM13), these would be expected to be considered first for additional landfill capacity, before a new site.

3. Bennett Bank had been put forward by its operators, Waste Recycling Group (WRG), as a site for additional landfill capacity. At earlier stages it was included in the Site Allocations Policies. However, a planning application proposal was refused planning permission by the County Council’s Development Control and Regulation Committee in May 2009. In those circumstances, it was inappropriate for the site to be included in the Site Allocations Policies and it was removed.

4. WRG appealed that refusal and the result of this was that planning permission was granted in March 2010. It was not then necessary to reinstate the site in the Site Allocations Policies. Provision has, therefore, been made in the south, north and west of the county.

Question 3.2

5. The appeal decision at Bennett Bank (ED57) provides an additional 580,000 cubic metres of landfill capacity at the site. The overall requirement in accordance with the Core Strategy is, therefore, for around 1.5 million m$^3$. As stated in Site Allocations Policies paragraph 3.10, it now seems likely that less landfill will be needed. This will be kept under review in the Annual Monitoring Reports.

Question 3.3

6. The reason for the priority was that there was no landfill capacity in the south of the county and waste was being taken to landfill near Fleetwood in Lancashire. That situation has been resolved, at least until 2017 when the permission expires, by the appeal decision for Bennett Bank. It is not, therefore, necessary to deliver the priority through policy.

7. The Annual Monitoring Reports will identify whether there is a need for further provision to be made and for policy to be reviewed.

Question 3.4

8. The County Council is not aware of any constraints to the deliverability of those sites, other than the expiry dates of current planning permissions within the plan period.

Question 3.5

9. This site’s potential void space of around 380,000 m$^3$ would be a valuable contribution to meeting the estimated need for landfill capacity and maintain an element of competition. It may be possible that the Core Strategy’s current requirement for 1.5Mm$^3$ of additional landfill could be provided at AL31 and
CA24. However, the appropriateness of that alternative cannot be presumed. Deletion of Thackwood would also remove flexibility.

10. Although Thackwood is in Eden, that district’s landfill needs are mainly met by the Flusco site. The current skip hire and Materials Recovery Facilities at Thackwood are understood to serve mainly the Carlisle area and to secure very high rates of re-use/recycling. As stated in Site Allocations Policies paragraph 5.119, ED7 is intended to support the adjoining activities.