This is in response to the Main Matter 2 of the Inspector’s Main Matters, Issues and Questions (document reference ED50)
SESSION 2

Tuesday 28 September (pm)
Question 2.1

1. Core Strategy Policy 9 (CSP9) derives from the waste strategy that is set out after Core Strategy paragraph 6.26. This strategy includes, “By 2020 the required waste management facilities will have been provided in the right locations and at the right time.” Core Strategy paragraph 7.30 states that, to provide flexibility, the Site Allocations Policies will try to identify more than the minimum number of sites.

2. Site Allocations Policies 2 and 3 identify around twice as many sites as are likely to be needed. The County Council considers that the twelve sites proposed in Policy 2 and the five in Policy 3 would be suitable for the range of waste facilities that could conceivably be required. Detailed planning application proposals will be considered in the context of the Development Control Policies.

3. By themselves, development plan policies cannot ensure that the range of facilities will be provided. It is not known exactly what will be required, except for the municipal waste contract.

4. As far as municipal waste is concerned, the long term waste management contract was signed off after the Core Strategy was prepared. It is now clear what facilities will be needed. Planning permissions have been granted for the two MBT plants and two Transfer Stations\(^1\).

5. The position is much less clear for commercial and industrial waste. The information about these waste streams is not as comprehensive or as reliable. This is a national problem. The NW region has been leading the way in plugging this data gap and has undertaken two surveys of businesses, their waste arisings and potential waste management options. This work was initially instigated by the NW Minerals and Waste officers group.

6. The approach that the Council has adopted, since the start of the MWDF preparation process, is that sites will not be identified specifically for the municipal or the commercial/industrial waste streams or for particular types of treatment facilities/technologies.

7. The reason for this approach is that the different types of waste treatment facilities have common requirements. They should be near the main sources of waste arisings, they will be within buildings, on sites of around 2 to 3 hectares and with good access relative to the amount and type of traffic they will generate. For EfW plants, sites of around 2 to 4.5 hectares are needed\(^2\).

8. In taking this approach forward, a considerable degree of flexibility has deliberately been built into CSP9 and the Site Allocations Policies. Firstly, CSP9 incorporates a range of estimates for waste arisings\(^3\). Secondly, the estimated number of new facilities provides further flexibility. This is because the estimates:-
   - had, at that time, to include provision for the facilities that would be required by both of the competing bids for the municipal waste management contract;

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\(^1\) see paragraph 3.6 of the Site Allocations Policies
\(^2\) see also paragraph 2.10 and Box 1 of the 2006 Issues and Options Discussion Paper (LD73)
\(^3\) see Core Strategy paragraphs 7.12 to 7.21
assumed that new treatment facilities would have capacities of around 50,000 tonnes/year\(^4\). Experience shows that throughputs could be in the range of 50,000 to 70,000 tonnes/year, for example where plants are based on modular components; and
there is even greater range in the potential capacity of Energy from Waste plants\(^5\).

9. The third factor in the flexible approach is that the Site Allocations Policies identify seventeen sites, not the minimum number of nine required for the Core Strategy Policy. This is in accordance with Core Strategy paragraph 7.30. The Council considers that it has made more than adequate provision for the full range of waste management facilities that are likely to be needed.

**Question 2.2**

10. AL3 and AL18 are proposed sites for both waste treatment facilities and Energy from Waste (EfW) plants and are adjacent to each other; as are AL8, proposed for waste treatment facilities and EfW, and AL31, proposed for additional landfill capacity. CA31 is proposed for waste treatment and EfW.

11. In the case of waste treatment facilities and EfW or landfill, it is considered that these can complement each other. The potential benefits of co-locating them can include a reduction in their cumulative impacts. This would include less need for lorry traffic between sites, in taking residual non-recyclable wastes away to a more distant landfill or taking a refuse derived fuel to an off-site energy generator\(^6\).

12. AL3 and AL18 are at the northern end of Workington and AL8 and AL31 at the southern end of the town, approximately 4km away (straight line distance). In the very unlikely event that similar facilities would be proposed and built at both these opposite ends of the town, it is not considered that there would be significant cumulative impacts because of the distance between them and their different access routes.

13. Paragraph 3.9 of SAP4 refers to the potential cumulative impacts of AL3 and AL18 and the Port Derwent regeneration scheme. Their cumulative impacts would be considered in accordance with Generic Development Control Policy 3.

14. AL8 and AL31 are part of the same long established waste management complex at Lillyhall, which already includes complementary facilities for waste recycling, treatment and landfill.

15. In the case of CA31, the owners of the Kingmoor Park complex of industrial estates/business parks are seeking to provide a waste management facility for the companies on the estates, which could provide some of the waste derived fuel for a power plant. The main intention is to generate electricity for the estates, which are served by one electricity main. It is considered that co-locating the treatment facility and the Energy from Waste plant would have advantages. Clearly, it would not be in the owners’ commercial interest for their proposals to cause adverse cumulative impacts.

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\(^4\) see Core Strategy paragraphs 7.26 and 7.29
\(^5\) In the context of Cumbria, figures of 20,000 to 200,000 tonnes/year were suggested in Box 1 of the 2006 Issues and Options Discussion Paper (LD73)
\(^6\) Co-location potential is one of the criteria in Core Strategy Table 1 Site location criteria
16. Except for the landfill area, these sites are all allocated for employment land in Local Plans. It is considered that the modern waste management facilities that are proposed are compatible with those allocations.

17. As already mentioned, all planning application proposals would be considered in the context of the Generic Development Control Policies, including Development Control Policy 3 - Cumulative Environmental Impacts.

Sub matter 2 - Sites in Allerdale

Question 2.5

18. The sites in Allerdale that are proposed in Policies 2 and 3 are AL3 Oldside; AL8 Lillyhall waste treatment centre; AL18 Port of Workington; AL34 part of the former Alcan complex (all at Workington); and AL30 Innovia, Wigton.

19. Workington is the main centre of population and industry, and source of waste arisings, in the Borough, although it is at its south western extremity. The northern part of Allerdale is closer to Carlisle than to Workington and is likely to be served by the sites that are proposed there, particularly when the Carlisle Northern Development Route is open.

20. Sites AL19 East Causeway Head, Silloth Airfield, and AL13 Glasson Road, Maryport, were considered at earlier stages.

21. AL19 was ruled out because it was considered to be too small, had access problems and is too remote from main sources of waste and the primary road network.

22. AL13 was ruled out before the 2007 Preferred Options stage, because it was considered to be a gateway site to a tourism-related regeneration scheme. The existing Household Waste Recycling Centre is at Glasson Road. AL35 Risehow, Flimby, is proposed as a replacement for it in Policy 1, in case it needs to be relocated in the interests of the regeneration scheme.

23. Aspatria was considered as a location for waste management facilities, because of its potential advantage of being mid-way between west Cumbria and Carlisle. However, no sites were able to be identified there.

24. With regard to delivery:-

- the prospective developers of AL3 asked for it to be upgraded to a first preference (representor ref 4);
- AL8 already has infrastructure for waste developments and is owned by the Waste Recycling Group, which supports its inclusion;
- AL18 is owned by the County Council and has road and rail access;
- AL34 is a disused brownfield site. There is some uncertainty about its delivery, because it is not clear whether its sale to new owners has been completed;

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7 See paragraphs 1.194 to 1.207 in the Site Assessments Report (SAP8)
8 Paragraph 5.15 of the Site Allocations Policies refers to the need for a transport assessment
• AL30 is a reserve site due to uncertainties about whether it can be delivered because of flooding issues\textsuperscript{10}.

25. Bearing in mind that not all of these sites are likely to be needed, the centre of gravity of waste arisings and the relationship of the northern part of Allerdale to Carlisle, the Council considers that the policies can deliver an appropriate pattern of facilities.

26. There are no updates to the Sustainability Appraisal or Site Assessment Reports.

**Question 2.6**

(i)

27. AL17 is partly owned by the Council and partly by Allerdale BC. A decision on a 2006 planning application by the Council for a Household Waste Recycling Centre, which had been recommended for permission, was deferred by Development Control and Regulation Committee.

28. This was because of concerns about its potential impacts on a major regeneration scheme and because of a perceived potential of the site for other employment uses. It has subsequently been subject to a marketing exercise, which failed to find any real interest in the site. Its inclusion in the policy was approved by Cabinet and Full Council. The 2006 planning application is regarded as withdrawn.

29. The site is part of the Joint Municipal Waste Management Partnership’s proposals. It is understood that there are no outstanding issues about deliverability, other than the submission of a new planning application and budget issues.

(ii)

30. The 2006 planning application was considered to incorporate appropriate mitigation measures and had an officer recommendation for approval. It is considered that a new application would similarly mitigate impacts on nearby houses.

(iii)

31. There is a valid planning permission for a Household Waste Recycling Centre at AL8, the Lillyhall Waste Treatment Centre. This could still be provided on that site, in addition to the other existing facilities there - an additional waste treatment plant and an EfW plant.

**Question 2.7**

(i)

32. These are all relatively large sites of around 8 to 10 ha, which are considered to have capacity to accommodate both waste treatment facilities and an EfW plant. The land required for co-located facilities would be less than the 2 to 3 ha plus 2 to 4.5 ha estimated to be needed for separate locations.

\textsuperscript{9} paragraph 5.36 of the Site Allocations Policies is relevant

\textsuperscript{10} see paragraph 5.22 of the Site Allocations Policies
33. They would be likely to have shared access and vehicle manoeuvring and parking spaces and incorporate common landscaping and wildlife mitigation measures.

(ii)

34. Need is likely to be a material consideration for planning application proposals. However, it is difficult to predict with confidence what weight would be given to it in the case of specific proposals. This could depend on if a view had to be taken on whether the need for a particular facility should outweigh the degree of any unmitigated impacts its development would have. There may also be considerations relating to maintaining competition in the market.

35. There is already concern that the capacity of EfW proposals within the region may exceed the amount of waste derived fuel that will be available. However, it seems most unlikely that expensive waste management facilities would be built for which there is no need.

36. Waste management is an evolving subject involving technologies that may be new to the UK. At the moment, the county is experiencing an unanticipated number of proposals for anaerobic digesters, at least partly due to Government support for this technology.

37. It seems unlikely that lack of need perceived in the Core Strategy would be used as the sole reason for refusing a planning application. It is not considered that it should be too prescriptive about maximum numbers of facilities. This is because it is based on assumptions about the volume of waste arisings, the provision of in-situ facilities and the capacities of new facilities which, inevitably, have an element of subjectivity and may prove to be incorrect. These are matters that will be kept under review in the AMRs.

(iii)

38. This question relates to the earlier one, about how to ensure that reserve sites do not come forward in advance of the first preference ones. Paragraphs 86 to 89 of the Council’s response on Topic Paper 1 are relevant. In particular, paragraph 87 explains the reasons why some specific sites are reserves.

39. The purpose of the comments and issues about the proposed sites is to identify some of the material considerations for planning application proposals.

**Question 2.8**

40. AL34 is a brownfield site, previously in industrial use as part of the former Alcan complex at Lillyhall, Workington. It is a site that was put forward by Cumbria Waste Management.

41. In the Sustainability Appraisal site matrices, the site scored positively for deliverability, with a comment that it had been recently purchased by a local company; scored very positively for economic potential, with a comment about possible contaminated land issues; and could not be scored against the local environmental assets criterion because there was too much uncertainty.

42. The comments in connection with this uncertainty are that the County Wildlife Site could restrict the range of waste management activities, but it was assumed that the footprint of existing buildings and roads would be used. Indirect impacts on the CWS and its use by amphibians must be considered.
43. Those scores are still considered to be relevant. However, the Council has been given conflicting information about the site’s delivery. These are in regard to whether the sale of the whole complex to new owners has been completed, whether there are outstanding matters relating to contaminated land liabilities and whether parts only of the complex would be available for sale/lease. These are current uncertainties which should be resolved in the near future. They are not considered to be so serious as to require the scores to be changed.

44. Cumbria Waste Management is no longer interested in this site. Planning permission has been granted for a waste transfer station on land between its Distington landfill site and the Alcan complex.
SESSION 3

WEDNESDAY 29 SEPTEMBER (am)
Sub-matter 1 - Sites in Barrow

Question 2.3

45. Core Strategy Policy 7 identifies the Barrow-in-Furness and Kendal areas in the south of the county as the strategic locations for major new Mechanical and Biological Treatment plants or Transfer Stations. Planning permission has now been granted for an MBT plant for the municipal waste management contract on site BA24 at Barrow. There is an existing transfer station at Kendal, which is being retained.

46. Planning permission has been granted for rebuilding and extending the existing Household Waste Recycling Centre at Ormsgill Yard, Barrow.

47. Adequate provision has, therefore, been secured for managing municipal waste. Planning permission has also been granted for an EfW plant at the Port of Barrow using, mainly imported, wood waste.

48. With regard to facilities for commercial and industrial wastes, there are a number of high energy-using industries at Barrow and there have been discussions about on-site waste derived fuel energy plants. Paragraph 7.29 of the Core Strategy explains that, for the purposes of the plan, it has been assumed that half of commercial/industrial waste will be managed in-situ and will not need sites to be identified.

49. At the 2006 Issues and Options stage of the plan, site BA5 at Sowerby Woods, Barrow\(^1\), was put forward for discussion. It was excluded because of the owners’ objections; there were also issues with access over an uncontrolled level crossing.

50. It has recently been proposed by the owners, but could not be included in the Site Allocations Policies without a further round of consultations. Appropriate Assessment would be likely to be needed, because the site is adjacent to the Morecambe Bay SAC and the Duddon Estuary SPA.

51. There are no other updates to the Sustainability Appraisal or Site Assessments Report.

Question 2.4

52. The Council is not aware of any serious constraints to the delivery of the proposed sites for Energy from Waste plants in Policy 3, except for AL30, which may have to be ruled out depending on its flood risk assessment. That site, at Wigton, is, like the others in Policy 3, at the opposite end of the county to Barrow. It has been proposed, by Innova, as an energy supply for its adjoining polyethylene/polypropylene factory. A site at Barrow could not be an alternative.

53. At the 2006 Issues and Options stage (LD73), several other sites in Barrow were considered – BA1 Phoenix Road/Bessemer Road, BA5 land adjacent to CW Manufacturing, BA11 and BA12 Park Road, and BA13 Ramsden Dock. These were ruled out, mainly because they were already committed to other development.

\(^1\) also known as Sandscale Park or land next to the candle factory
54. The Barrow Waterfront Business Park is part of the area that was identified as BA13. It is part of a major regeneration scheme shown on the Barrow Area Action Plan. Planning permission has been granted by the Council for the road layout, proposals for buildings will be matters for Barrow BC. The site was ruled out, before the 2007 Preferred Options stage, because of representations relating to the regeneration scheme.

55. Another relevant factor was that planning permissions have been granted, on nearby land at the port, for an EfW plant and for a tyre recycling plant. It is not considered appropriate to identify land for additional waste management facilities in this location. Any proposals would be considered in the context of the Development Control Policies.

56. Sandscale Park is the site that was identified as BA5 at the Issues and Options stage, but not taken into the 2007 Preferred Options. The leaseholders objected to it being included because they had alternative plans for the site. It would appear that this may have changed, although it is not known what formal interest Catalyst Lend Lease has in the land.

57. Without the objections, in my opinion, the site could have been likely to be one of the Council’s preferred ones. There are issues about its access and proximity to the European Wildlife Site.

58. Sandscale Park and the Waterfront Business Park have not been the subject of Sustainability Appraisal in this Development Framework.

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12 It had been part of a Council reclamation scheme several years ago and is still owned by the Council but there is a very long lease
SESSION 5

Thursday 7 October
Sub Matter 3 – Sites in Carlisle

Question 2.9

59. A planning application has been submitted for CA30; the owners have confirmed their intentions for CA31 and have recently gone out to the market for interest in an Energy from Waste plant; CA24 is owned by the Council; a planning application has been submitted for a supermarket that would involve a new roundabout for the access to CA11. The CNDR is under construction, programmed to be open 2012\textsuperscript{13}.

60. These sites are appropriately located in relation to the imminent new road system to serve this part of the county. They are able to provide for a range of waste facilities to complement existing ones.

Question 2.10

(i)

61. No decision has been made about an additional HWRC to serve north Carlisle. As these now cost around £1M it seems unlikely that one could be built in the current economic climate.

(ii)

62. The possible need for an additional HWRC at Carlisle was originally identified in the 2006 Issues and Options Paper\textsuperscript{14} and was carried forward as one of the nine sites required by CSP9. Provision of additional landfill capacity in this northern part of the county is consistent with Core Strategy Policy 7 and paragraph 7.31.

63. Site Allocations Policy paragraphs 5.65 to 5.68 describe issues that are likely to be involved for developments at CA24. Planning permissions have previously been granted for landfill on the basis that environmental impacts were within acceptable limits. The rate of landfilling and proportions of biodegradable waste are likely to reduce with consequent reduced environmental impacts for future proposals. Transport assessments would be needed once the CNDR has opened.

64. Proposals would be considered in the context of MWDF policies, including Development Control Policy 3 – cumulative impacts.

(iii)

65. The Council is not aware of such constraints for CA24 that would require those extension areas. Paragraph 5.69 of the Site Allocations Policies explains why the Council considers the additional areas are not acceptable. They are included in SAP3 the Sustainability Appraisal on pages 103 to 108.

\textsuperscript{13} Maps showing CNDR are in Appendix 1
\textsuperscript{14} Paragraph 5.25 in LD73
Question 2.11

(i)

66. CA28 and CA29 are both in the area immediately to the north of Carlisle, where there are several existing and proposed waste management facilities. With regard to the requirements of Core Strategy Policy 9, the Site Allocations Policies still identify more than enough sites.

67. The removal of these sites from the policies, at such a late stage, has raised issues about compliance with procedures. The Council did not repeat the Regulation 27 consultations with the amended policies. Letters, pointing out this change, were written to representors who had commented on these sites when the Site Allocations Policies were submitted at the Regulation 30 stage. These letters are in ED48.

68. Having been made aware of the changes, representors are able to pursue their comments through the Examination and Hearing in Public process.

69. The Council considers that no-one’s interests have been substantially prejudiced to any extent by the lack of an additional formal round of Regulation 27 consultations.

(ii)

70. CA29 is part of the Heathlands industrial estate and has an area of around 4ha, CA31 Kingmoor Park East around 6 ha. It is considered that these sites are large enough to accommodate co-located facilities with the capacities that are likely to be relevant.

(iii)

71. See paragraphs 34 to 37 above.

72. CA30 is an existing facility; the proposals for it are described in paragraph 5.70 of the Site Allocations Policies and represent a relatively modest increase in throughput. A planning application has now been submitted. The reserve site CA11 at Willowholme is, similarly, an existing facility, and unlikely to involve a very substantial increase in capacity that would be incompatible with the estimated requirements in the Core Strategy.

73. The proposals for CA31 are directly related to the activities at the complex of industrial estates/business parks owned by Kingmoor Park Properties.

74. All three sites would be likely to offer services to the commercial and industrial sectors. This is not considered to be incompatible with Core Strategy; they would provide a valuable contribution to the waste hierarchy for which there is considerable potential for these waste streams as landfill costs continue to rise.

(iv)

75. The reserves are CA24 in Policy 1 and CA11 in Policy 2; CA30 and CA31 are first preferences in Policy 2; CA31 is a first preference in Policy 3; and CA24 is a first preference in Policy 3.

76. Planning permission had already been granted for a Mechanical and Biological Treatment plant and Transfer Station at CA24 (Site Allocations Policy paragraph 3.6).
77. The reasons why sites are reserves or first preferences are set out in Site Allocations Policies paragraphs 5.61 to 5.76. The main issues relate to traffic and the impact of the Carlisle Northern Development Route once it opens in 2012. CA30 and CA31 are very close to a roundabout on the new road, traffic to the other sites would have to use lengths of other roads. CA24’s first preference for landfill is based on the assumption that additional landfill capacity would be to extend the life of the site but not increase traffic levels.

78. In connection with CA11, a current planning application that is being considered by the City Council has already been mentioned in paragraph 58 above.

79. The Council considers that the status of sites as the first preference or as reserves is still relevant.

(v)

80. Depending on what may be proposed, it is not considered that these issues should necessarily be regarded as “showstoppers” for these sites. There is a reasonable likelihood of mitigation.

81. The issues for CA11 are flooding/flood compatible development, need for Appropriate Assessment under the Habitats Regulations and the access to this industrial estate.

82. The issues for CA30 are access, the Carlisle Local Plan allocation as a Primary Leisure Area, proximity to houses, protected species. A planning application is currently being considered, which includes a small extension into the area proposed in Policy 2 for extending the site.

83. The site is well located near to the Carlisle Northern Development Route (CNDR); the implications of the 13ft 9ins height restriction of the bridge between the site and the CNDR are not clear, but will be a consideration for the current planning application.

84. With regard to the Local Plan, the City Council objected at the July 2009 Regulation 25 stage, but did not pursue this at the Regulation 27/28 stage. Local Plan Policy LC2 would require an alternative open space to be provided.

85. Proximity to houses and Protected Species would be material considerations for planning application proposals.

86. The issues for CA31 are Appropriate Assessment under the Habitats Regulations and a County Wildlife Site. These would need to be addressed in a planning application.

(vi)

87. CA31 has been put forward by the owner of the complex of industrial estates/business parks in this area of Carlisle. The proposals, particularly those aspects associated with energy supply, are understood to be seen as an important element for the marketing of these. The effects are, therefore, seen to be beneficial and contributing to the soundness of the DPD (see also paragraph 15 above).
Question 2.12

88. The County Council is not aware of any such serious constraints on their deliverability. The issues that have been described should be capable of being resolved. The constraint on further developments at CA24 is more fundamental in that the Council considers the site has been developed to the maximum level that is acceptable (Site Allocations Policies paragraph 5.69). The Sustainability Appraisal pages 103 to 106 is intended to relate to the existing site and the proposed and suggested extensions.
SESSION 8

Tuesday 12 October (pm)
Sub Matter 4 – Sites in Copeland, Eden and South Lakeland

Question 2.13

89. The south of the county, particularly South Lakeland, has presented the greatest difficulties in identifying sites; this is, at least in part, due to the scarcity of brownfield land and of undeveloped industrial allocations. With recent planning permissions for landfill at Bennett Bank, for improvements to the Household Waste Recycling Centre and for the MBT plant at Barrow and with the existing Transfer Station at Kendal Fell, the identified sites SL1A and SL1B are considered to provide an adequate pattern of facilities. The latter sites are supported by the owner, Waste Recycling Group, and by the district and National Park planning authorities; most of the quarry floor is within the National Park, not this plan’s area.

90. In Copeland, the most urgent need is to replace the Frizington HWRC; CO1 is identified for this, North West Development Agency now support this. If that solution is not delivered, CO11 offers a contingency for a small satellite HWRC. CO11 could also accommodate a relatively small waste treatment facility. The HWRC at Millom is not up to modern day standards and CO34 provides for a replacement. Whitehaven is the main source of waste and is near to the Lillyhall landfill and waste management centre, which are just outside the Borough boundary.

91. The main waste facilities in Eden are the landfill, HWRC and Transfer Station at Flusco, near Penrith, which is also identified in Policy 2. The other identified sites are ED1 Blencowe quarry, near Flusco, as a reserve in Policy 2; ED7 Thackwood for landfill, near Carlisle; and ED10 at Appleby, should the municipal waste management partnership decide that an HWRC should be built in this part of the county. The owner of Flusco is supportive; the site is operated by a 50:50 partnership of the owner and Cumbria Waste Management. Blencowe may not be deliverable because of the owner’s other intentions (paragraph 5.115). ED7 is supported by its owners, but depends on prior extraction of clay. Site Allocations Policies paragraph 3.5 refers to the Alston area.

92. Eden is a very large but sparsely populated district and it is considered that the existing and proposed sites provide an appropriate pattern of facilities.

93. There are no updates for the Sustainability Appraisal or Site Assessments.

Question 2.14

94. An initial assessment is that this site is unlikely to provide Natterjack Toad habitat. The other mitigation measures would be fairly standard requirements of a planning permission.
Question 2.15

95. Section 5 is intended to highlight issues that would need to be considered in planning application proposals. It is not intended that section 5 is used alone to consider issues, but reference to other documents guides the reader to further details found in the Habitat Regulations Assessment, Sustainability Appraisal, etc.

96. For CO1, the main matters to consider are ground stability, as this is a former mining area, and ensuring that the development is compatible with the existing commercial park. These would be considerations for a planning application. Mitigation measures for habitats/species would be fairly standard requirements of a planning permission.

97. For CO11, this is a reserve for a small HWRC should CO1 be undeliverable. The issues at this site arise from its potential for a small waste management facility. It is identified as first preference, as this is the only site for such development that has been able to be identified in Copeland. Appropriate Assessment, under the Habitats Regulations, would be needed and there would need to be mitigation for nearby houses. These would be addressed in a planning application.

98. For ED1, this is a reserve for waste treatment facilities as there is a question over its deliverability. The owner currently has planning permission for the site’s development as a caravan/lodge park. Mitigation measures for habitats/species would be fairly standard requirements of a planning permission, should one be submitted. Lorries to/from the Flusco landfill complex are already routed away from Newbiggin, so it would be a simple condition to do the same for this nearby site.

99. For ED10, mitigation measures for habitats/species would be fairly standard requirements of a planning permission.

100. For ED31, lorries to/from the complex are already routed away from Newbiggin. Mitigation measures for habitats/species would be fairly standard requirements of a planning permission.

101. For SL1B, the routing of lorries via the bypass and away from the town would be a matter for consideration in the planning application. Mitigation measures for habitats/species would be fairly standard requirements of a planning permission.

Question 2.16

102. The County Council is not aware of any representations being made about the deletion of ED 33.
APPENDIX

MAPS OF THE CARLISLE NORTHERN DEVELOPMENT ROUTE