



PLANNING AND COMPULSORY PURCHASE ACT 2004

**TOWN AND COUNTRY PLANNING
(LOCAL PLANNING) (ENGLAND) REGULATIONS 2012**

**DRAFT CUMBRIA MINERALS AND WASTE LOCAL PLAN
2015 to 2030**

SUSTAINABILITY APPRAISAL UPDATE

**TO ACCOMPANY
PROPOSED MAIN MODIFICATIONS TO THE
PUBLICATION (REGULATION 19) PLAN
POST HEARING SESSIONS**

MARCH 2017

Introduction

In response to comments submitted during the Regulation 19 consultation (May to July 2016) on the draft Cumbria Minerals and Waste Local Plan (“the Plan”), a number of modifications were proposed when the Plan was submitted to the Planning Inspectorate for examination. Following the Hearing sessions of the Plan’s examination (November/December 2016), further modifications are proposed. The Minor Modifications have been compiled by the County Council, in order to ensure consistency with national policy, to make factual changes or to add clarity to the Plan. The Main Modifications are a result of recommendations made by the Inspector during the Hearing sessions and in response to her Matters and Issues, in order to make the Plan sound and legally compliant.

The Main Modifications are subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in this SA Report update (March 2017), in so far as they may alter those impacts highlighted in the SA/SEA Report (April 2016) that accompanied the Regulation 19 consultation on the draft Cumbria Minerals and Waste Local Plan. This SA Report update forms part of the SA/SEA of the Plan and it should be read alongside the 2016 SA Report. Sustainability impacts identified in this update report represent changes to the 2016 report.

This update report screens the proposed Main Modifications to the Plan, to see whether they would result in any additional significant impacts to those identified within the 2016 SA Report. Should any additional significant impacts be identified, this update document sets out any changes to the SA Report that are necessary. Any temporal, secondary, cumulative or synergistic impacts resulting from the Main Modifications will also be highlighted, should they be apparent.

It has been assessed, after initial screening, that none of the Plan’s proposed Minor Modifications will give rise to any significant sustainability effects, nor will there be any resultant change to the 2016 SA Report; therefore, it is considered that the Minor Modifications do not require further Sustainability Appraisal, so are not discussed in this SA Report update.

1. A table of proposed **Main Modifications** is set out below in paragraph and policy order. The final column of the table identifies any additional significant sustainability effects or changes to the 2016 SA Report.

- deleted text is shown as red, with a line through the words, e.g. ~~strikethrough~~
- new text is shown in green

2. **Annex A** is provided, to illustrate changes required to the tables, scoring matrices or appendices of the 2016 SA Report.

The 2016 SA Report was submitted to the Secretary of State as document SD23 and can be found on the County Council’s web page: http://www.cumbria.gov.uk/planning-environment/policy/minerals_waste/MWLP/submissiondocuments.asp

Conclusions

1. For the majority of the Main Modifications, especially those to the text that supports the policies, there will be **no significant sustainability effects** and therefore no changes required to the 2016 SA Report.
2. For the majority of the Main Modifications that relate to additions, deletions and amendments of text within the Plan's policies, neither the implementation of those policies nor the site allocations will be affected. Therefore, there are **no significant sustainability effects** and no changes required to the 2016 SA Report.
3. For a small number of Main Modifications, there will be **no significant sustainability effects**, but there will be changes required to the 2016 SA Report. These are summarised below and set out in detail in Annex A to this update report.

a. Main Modification MM35 - split of Policy SP7 into two policies

Updates required to:

- Table 4.2: Summary of assessment of the Strategic Policies
- Table 4.3: Conclusion of the assessments of the Strategic Policies
- Appendix 3: Strategic Policies Assessments (scoring matrix)

b. Main Modifications MM71 and MM72 – addition of identified Broad Areas to Policy SAP2 and supporting text

Updates required to:

- Table 6.1: Summary of the assessments of the Site Allocation Policies SAP1, SAP2, SAP3
- Table 6.4: Conclusions of the site assessments
- Table 8.2: Summary of mitigation proposals suggested for Site Allocations arising from SA process
- Appendix 5: Site Assessments (scoring matrix)

c. Main Modifications MM73, MM74 and MM75 – clarification of policy approach to site CO32 in Policy SAP3 and supporting text

Updates required to:

- Table 6.1: Summary of the assessments of the Site Allocation Policies SAP1, SAP2, SAP3
- Table 6.4: Conclusions of the site assessments
- Table 8.2: Summary of mitigation proposals suggested for Site Allocations arising from SA process
- Appendix 5: Site Assessments (scoring matrix)

Main Modifications to the Cumbria Minerals & Waste Local Plan and their impact on the SA/SEA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
MM1a	1	Paragraph 1.5	Insert new sentence “.....consultations in 2009 to 2011. For a list of all the superseded MWDF policies, and the MWLP policy replacements, see Appendix 1.”	To provide clarity regarding superseded policies	No significant sustainability effects or changes required to the SA Report
MM1b	203	Appendix 1	Insert new Appendix 1, listing the superseded and replacement policies. (see Annex 1 to this Table of Main Modifications for new Appendix)	To provide clarity regarding superseded policies	No significant sustainability effects or changes required to the SA Report
MM2a	1	Following paragraph 1.6	Insert new paragraphs 1.7, 1.8 and 1.9, to read: “ <i>New National Park designations</i> 1.7 Extensions to the Yorkshire Dales and Lake District National Parks, by Variation Order, were confirmed in writing by the Secretary of State on 23 October 2015. The extension areas are shown on the map in Appendix 2; apart from a small area of land between Kirkby Lonsdale and Ingleton on Leck Fell, which lies in Lancashire, all of the extension areas fall within the county of Cumbria. 1.8 Following the transfer of functions on 1 August 2016, the respective National Park Authorities became the Local Planning Authority for the newly designated areas, with responsibility for determining all applications for planning permission and Listed Buildings consent, as well as the responsibility for preparing a Local Plan, which would include minerals and waste planning policy. Both the Lake District National Park Authority (LDNPA) and Yorkshire Dales National Park Authority (YDNPA) will use existing, adopted development plan policies in the extension areas, i.e. the adopted policies of South Lakeland District Council, Cumbria County Council, Lancaster City Council and Lancashire County Council, as appropriate. However, the National Parks have indicated that the statutory implications of National Park designation, as outlined in the	To provide clarity regarding minerals and waste planning in the National Park extension areas	Neither implementation of the Plan's policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report

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			<p>NPPF, will be a material consideration in their determination of applications in these areas.</p> <p>1.9 Whilst the National Park Authorities are now the minerals and waste planning authorities in the extension areas, the adopted development plan document for Cumbria County Council will remain the extant minerals and waste policy for those new areas that fall in Cumbria. This will continue until either: a) the YDNPA and LDNPA choose to adopt the Cumbria Minerals and Waste Local Plan for the relevant extensions or b) the YDNPA and LDNPA review their own Local Plans, to include the extension areas.”</p> <p>There will be consequent changes to the Policies Map Part 1, and to Insert maps E and F; these will identify the new areas designated as National Park.</p>		
MM2b	203	Appendix 2	<p>Insert new Appendix 2, showing the new areas designated as National Park on a map. (see <i>Annex 1 for new Appendix</i>)</p>	To provide clarity regarding minerals and waste planning in the National Park extension areas	No significant sustainability effects or changes required to the SA Report
MM3	9	Box 2.2 overall strategy	<p>Insert new bullet points at the end of the Box, to read:</p> <ul style="list-style-type: none"> As for conventional wastes, radioactive waste arisings in the county will be minimised, as will its unnecessary import, ensuring that the right facilities are built in the right place at the right time; the full range of the radioactive waste industry's management, movements and facilities will be supported, as long as they do not have any significant adverse environmental, social or economic impacts in the county. The appropriate long term, safe storage facilities for higher activity radioactive wastes are provided, until a suitable disposal route is available. 	To clarify the strategy approach to the radioactive waste industry in Cumbria	No significant sustainability effects or changes required to Table 4.1 of the SA Report
MM4	10, 11	Box 2.3 Strategic	Add text into Objective 4, on the aim for net self-sufficiency in waste management.	To clarify the County Council's aim for net	No significant sustainability effects or

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		Objectives	<ul style="list-style-type: none"> that whilst aiming for net self-sufficiency in waste imports and exports, waste will be managed as near as practicable to where it is produced, without endangering people's health and without harming the environment. 	self-sufficiency in waste management	changes required to Table 4.1 of the SA Report
MM5a	16	Paragraph 3.15	<p>Amend paragraph, to read:</p> <p>"It is evident that current waste tonnages were being accommodated in 2014, and there are no immediate capacity gaps for Cumbria; there could indeed be spare capacity in the existing Cumbria waste facilities. Table 3.3 provides details of known capacity (excluding landfill, which is provided in Table 3.7) at built facilities across Cumbria at the end of 2014; when available landfill capacity is added to this figure, the total capacity available exceeds that required to manage all the waste that arose. Furthermore, the Waste Data Interrogator for calendar year 2015 indicates that there is a further 300,000 tonnes of capacity available¹. The potential need for additional waste facilities during the lifetime of the Local Plan was examined in terms of waste growth, changes in imports and exports, increased diversion from landfill and a corresponding need for new built facilities for recycling or recovery. Possible closures of facilities were also considered."</p>	To set the context for the new Table 3.3 on waste capacity	No significant sustainability effects or changes required to the SA Report
MM5b	16	Following paragraph 3.15	<p>Insert new Table 3.3: Waste capacity (tonnes) in Cumbria by facility type – 2014 (see Annex 1 for new Table)</p> <p>There will be consequent changes to the numbering of the Tables that follow in chapter 3.</p>	To illustrate the waste capacity at facilities in Cumbria	No significant sustainability effects or changes required to the SA Report
MM6a	18	Following paragraph 3.22	<p>Insert new paragraph 3.23, to read:</p> <p>"The scenario taken forward by the needs assessment is the realistic scenario. All three scenarios use the same growth assumptions for LACW, C&I and hazardous wastes, with differing options for CD&E</p>	To provide information on the scenario taken forward in the Waste Needs Assessment, and to show future	No significant sustainability effects or changes required to the SA Report

¹ The 2015 WDI was released during the MWLP examination, but data in the Local Plan and Waste Needs Assessment are based on the 2014 WDI

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			<p>waste. The realistic scenario is considered the most appropriate, as this accounts for expected changes in the levels of Excavation waste and Construction & Demolition waste; the growth in excavation waste is closely linked to planned major infrastructure in the county. Although exact figures are not yet known, there is some indication that around 2.5 million cubic metres of excavation spoil may arise as a result of developments such as new nuclear build and the associated upgrade of the National Grid network; such forecasts and the estimated timescales for the projects are incorporated into the modelling for this WNA. In respect of C&D waste, the realistic scenario assumes some growth, but that materials are re-used, recycled or used onsite in place of primary aggregates, and thus assumes lower levels of waste generation. Table 3.4 shows projected arisings at 5 year intervals over the Plan period.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 3.</p>	waste arisings, in line with the National Planning Policy for Waste	
MM6b	18	Following new paragraph 3.23	Insert new Table 3.4: Predicted waste arisings in Cumbria 2015 to 2030 (tonnes) (see Annex 1 for new Table)	To illustrate the predicted future waste arisings in Cumbria	No significant sustainability effects or changes required to the SA Report
MM7	18	Table 3.3	<p>Update Table 3.3 to show information from 2010 to 2014 for waste imports and exports to/from Cumbria.</p> <p>Table 3.3: Cumbria Recorded waste exports and imports (in tonnes) from Cumbria 2006 to 2014 (excluding to Scotland) (see Annex 1 for updated Table)</p>	To provide the reader with a better understanding of historical waste self-sufficiency in Cumbria	No significant sustainability effects or changes required to the SA Report
MM8	22	Following paragraph 3.38	<p>Insert new paragraph 3.39, to read:</p> <p>“Bennett Bank will continue to accept non-inert waste until December 2017, after which, capacity will be reserved for inert waste for restoration purposes; this will cease by December 2018, when restoration should be complete. Additional inert voidspace of 850,000m³ will be created at Goldmire, with landfilling due to</p>	To provide information on sites likely to come forward during the Plan period and to ensure that the Plan is in line with the National Planning	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability</p>

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			commence during 2017. Capacity at Flusco is expected to come on stream later in the Plan period and will provide at least 240,000m ³ , following extraction of limestone. Further development at Roan Edge is currently subject to a planning application, which is due to be determined in 2017; if permitted, this would increase the existing voidspace to around 510,000m ³ .”	Policy for Waste in terms of future waste management	effects or changes required to the SA Report
MM9a	24	Following paragraph 3.46	Insert new paragraph 3.47, to read: “In addition to waste managed at licensed sites, exemptions ² also play a role in managing Cumbria’s waste. Information provided by the Environment Agency shows that there were over 23,000 simple waste management exemptions issued in the county in 2014; Table 3.10 provides details on reported exempt activity (by number) at sites across Cumbria. Almost two-thirds of the exemptions relate to agricultural activities only, which allow storage or disposal of wastes on the holding where the wastes arose and, therefore, do not need to be taken into account in the needs assessment. Although it is recognised that infrastructure provided at sites that have been issued with exemptions make some contribution to local waste management capacity, it is not possible to identify this accurately. However, it is assumed that this route of waste management will continue and will provide capacity equivalent to existing levels.”	To provide clarity on how exemptions have been taken into account in the Waste Needs Assessment	No significant sustainability effects or changes required to the SA Report
MM9b	24	Following new paragraph 3.47	Insert new Table 3.10: Overview of principal waste exemptions (see Annex 1 for new Table)	To provide an overview of the principal waste exemptions	No significant sustainability effects or changes required to the SA Report
MM10	24	Paragraph 3.47	Replace paragraph with up-to-date information, to read: “The 2014 WNA report provided a summary of total capacity required 2013-2030 for the principal types of waste management functions³, a	To factually update the Plan	No significant sustainability effects or changes required to the SA Report

² Exemptions provide a simplified licensing structure for waste activities with limited environmental risk, occurring typically on a very small scale for specific purposes. Exemptions have to be renewed every 3 years, which also indicates that they tend to occur on a one-off basis or over a limited period.

³ ~~Evidence Base document reference LD267: Table 11.1, Cumbria County Council Waste Needs Assessment, Urban Vision, December 2014~~

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			summary of additional built waste facilities that may be required, and estimates of landfill void capacity throughout the Plan period. Tables provided predictions under the “Best” case and “Pragmatic” case scenarios at 2015, 2020, 2025 and 2030. The capacity gaps estimated for the principal waste management functions were also detailed for both the Best and Pragmatic cases. Section 10 of the 2015 Waste Needs Assessment provides a summary of the capacity requirements over the Plan period. Appendix B, Tables B4 to B6 of the 2015 WNA, provide a detailed breakdown of waste growth and waste minimisation initiatives over the Plan period, and the requirements for managing waste that result from this. The needs assessment concludes that the capacity requirements identified are deliverable over the Plan period.”		
MM11	25	Paragraph 3.48	Amend the first sentence of this paragraph, to read: “The key conclusions from these tables in the 2014 2015 WNA are as follows:”	To factually update the Plan	No significant sustainability effects or changes required to the SA Report
MM12	25	Paragraph 3.48	Amend the fourth bullet of this paragraph, to read: <ul style="list-style-type: none"> A need for additional composting facilities for C&I waste and LACW would arise in 2020 if a time extension were not to be granted for an existing facility. The existing consent would, however, automatically be extended if the adjacent landfill were to be granted a time extension. Should the consent not be extended, a capacity gap in the order of 57,000 tonnes would occur for treating compostable waste arising in Cumbria, increasing to up to 85,000 tonnes, if waste that is currently imported is also included. 	To provide clarity	No significant sustainability effects or changes required to the SA Report
MM13	25	Paragraph 3.48	Amend the final bullet of this paragraph, to read: <ul style="list-style-type: none"> There is a current requirement for thermal waste treatment capacity in the county, which is likely to reach a maximum of almost 120,000tpa in 2020 and diminish thereafter. A permission was granted late 2016 which, when built, will provide 	To provide further information on waste management capacity that has emerged since the Plan was submitted	No significant sustainability effects or changes required to the SA Report

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			for up to 195,000tpa, more than sufficient capacity to meet this need.		
MM14 a	25	Paragraph 3.50	Add new sentence at the end of this paragraph, to read: “Table 3.11 provides details of the anticipated tonnages and voidspace for the realistic scenario, which the Plan is seeking to deliver.”	To provide context for new Table 3.11 regarding non-inert landfill requirements	No significant sustainability effects or changes required to the SA Report
MM14 b	25	Following paragraph 3.50	Insert new Table 3.11: Non-inert landfill requirements in Cumbria 2015 to 2030 (see Annex 1 for new Table)	To illustrate predicted future non-inert landfill requirements in Cumbria	No significant sustainability effects or changes required to the SA Report
MM15 a	26	Paragraph 3.56	Add new text and split this paragraph into two, to read: “3.56 Ongoing provision for inert landfill at Roan Edge would require a time extension early in the Plan period; an application for a 15 year time extension to 2031 was submitted in October 2016. Although still awaiting supporting data, a further application is expected for a physical extension at Roan Edge, which together with the current voidspace will provide around 510,000m ³ capacity. but there is an additional 1,413,000m³ of inert capacity with planning consent for inert landfill capacity at Flusco (at least 240,000m ³) and at Goldmire Quarry (850,000m ³); they are both reliant on mineral extraction to provide the voidspace, though inert material for bunding has begun import at Goldmire. After some years of prior extraction and engineering preparation, Goldmire will become operational in 2017; Flusco will come on stream later in the Plan period. Thackwood landfill is no longer operational, but recent pre-application talks indicate that it may be restored with inert material, though the volume would be very small. The operator of Derwent Howe inert landfill is currently developing a scheme to cap and landscape this site, which is also no longer operational. 3.57 It is considered that an overly restrictive policy approach to new inert landfill should be avoided, whilst ensuring that inert landfill	To provide an update and context on inert landfill requirements in Cumbria	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report

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			capacity to meet specific needs, if and when they arise, do not undermine the waste hierarchy. It is also important to recognise the role that non-inert landfill plays in managing inert waste; this is clear when looking at how inert waste to landfill was disposed of in 2014, which indicated that just 10% went to inert landfill with the remaining going to non-inert sites. In addition, the Environment Agency estimate that 25% of the capacity of non-inert sites will be taken up by inert waste; therefore, the capacity needs for inert waste disposal should not be considered in isolation. Table 3.12 provides details of the anticipated tonnages and voidspace for the realistic scenario, which the Plan is seeking to deliver.		
MM15 b	27	Following paragraph 3.56	Insert new Table 3.12: Inert landfill requirements in Cumbria 2015 to 2030 (see Annex 1 for new Table)	To illustrate predicted future inert landfill requirements in Cumbria	No significant sustainability effects or changes required to the SA Report
MM16	27	Paragraph 3.59	Amend paragraph, to read: “The need for composting sites identified in paragraph 3.48 , arises from the potential closure of one 25,000tpa composting facility adjacent to the Thackwood landfill site, and one 75,000tpa facility that is adjacent to Hespín Wood landfill. The temporary planning consent for the latter development is directly linked to the continued operation of the Hespín Wood landfill site, which has a permission end date of 2020, and would automatically be extended if a time extension for the landfill site were to be granted. If it were granted, no further composting sites would be required in the Plan period. If not, one additional site of 7 85,000tpa capacity would be sufficient.”	To link back to the Waste Needs Assessment conclusions	No significant sustainability effects or changes required to the SA Report
MM17	29	Paragraph 3.66	Amend this paragraph and split into two, to read: “3.66 The 2014 WNA did not identify any current or predicted gaps in provision for agricultural waste. Data is no longer specifically collected on agricultural waste by the Environment Agency; thus all arisings that leave farms and enter the Waste Data system, are recorded and managed as C&I waste. Any requirement would,	To provide clarification on agricultural waste data, and to update the Plan on sewage waste	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability

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			<p>therefore, be addressed by those facilities in place to deal with the C&I waste stream.</p> <p>3.67 The WNA did not identify any or significant gaps in provision for sewage waste (wastewater treatment). United Utilities (UU), the statutory undertaker for wastewater in Cumbria, confirms that their latest 5-year Asset Management Programme (AMP6) identifies the need for a new wastewater treatment works (WwTW) as part of a major capital scheme to upgrade the West Cumbria water supply network. The entire scheme gained planning permission in November 2016, and the proposed WwTW at Bridekirk would will connect a new clean water transfer main from Thirlmere and a new treated water transfer main to an existing service reservoir. However, there will be associated decommissioning of a number of WwTWs and pumping stations, so the amount of wastewater needing treatment will not increase significantly. Capacity requirements Progress will be kept under review, but currently, all requirements are fulfilled.”</p>		effects or changes required to the SA Report
MM18	31	Policy SP3 Waste capacity	<p>Amend the Landfill section of this policy, to read:</p> <p>“Landfill</p> <p>Time extensions for existing landfill facilities will be considered favourably if they are necessary:</p> <ul style="list-style-type: none"> • to meet a capacity need identified in this Plan; or • to achieve acceptable restoration contours; or • to maintain an integrated network of a range of appropriate and necessary waste management facilities across the county. <p>Proposals for additional inert or non-inert landfill capacity will be considered if they are necessary to meet a capacity need identified in this Plan, or if it can be demonstrated that there is a need for the development and that it would not undermine the waste hierarchy.</p> <p>Time extensions for existing landfill facilities will be considered if they are necessary:</p>	To provide clarity and priority on the approach to planning applications for landfill in the county	No significant sustainability effects or changes required to the SA Report

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			<ul style="list-style-type: none"> to meet a capacity need identified in this Plan; or to achieve acceptable restoration contours; or to maintain an integrated network of a range of appropriate and necessary waste management facilities across the county. 		
MM19	39	Paragraph 4.14	<p>Amend the text on Sellafield in this paragraph, to read:</p> <p>“Sellafield: 1,770m³ HLW (100% of UK total), in 5,626 packages 69,600m³ ILW (73% of UK total), in 47,569 packages conditioned and unconditioned⁴ 3,450m³ LLW (5% of UK total) 1,080m³ VLLW (92% of UK total)”</p>	Factual amendment	No significant sustainability effects or changes required to the SA Report
MM20	39	Following paragraph 4.18	<p>Insert new paragraphs 4.19 to 4.24, to read:</p> <p><i>“Capacity to manage the volumes of radioactive waste</i></p> <p>4.19 Unlike conventional wastes (discussed in chapter 3), the County Council cannot aim for net sufficiency in the management of radioactive wastes, other than for HLW; this arises only at Sellafield, from the reprocessing of foreign and domestic spent fuel, and is repatriated or safely stored on site, awaiting a disposal route circa 2089. Assuming all HLW from overseas spent fuel has been exported, a total of around 7,500 HLW containers are expected to be stored in an engineered facility on the Sellafield site; storage capacity in this Vitrified Product Store is 7,960 containers.</p> <p>4.20 The majority of the ILW safely stored at Sellafield is generated internally, with additional, smaller volumes of wastes from Harwell and Winfrith; altogether over the Plan period, it is anticipated that these will amount to approximately 17,000m³. There may also be a few hundred cubic metres of waste generated during the decommissioning of storage vaults at LLWR, and the potential for around 1,000m³ of plutonium contaminated material (PCM) generated at Aldermaston.</p>	To provide context on the capacity to manage radioactive waste in the county	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

⁴ The UK total number of conditioned ILW packages is 54,129, of which 47,569 (88%) are at Sellafield

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			<p>There are a range of engineered ILW stores at Sellafield, designed specifically for the different waste types (e.g. PCM, beta gamma) and packaging (e.g. drums, concrete boxes); both the current and future planned stores have adequate capacity for ILW management until a disposal route is available circa 2089.</p> <p>4.21 Sellafield currently has the capacity to manage all of its LLW arisings, which are forecast to be around 80,000m³. On site capabilities include handling, segregation and measurement; metals recycling; and a supercompaction plant. Off-site capabilities include metals recycling (both within and outside the county), incineration (outside the county) and disposal to the LLWR. The Repository has planning permission for disposal of LLW until 2055, in the current vaults (8, 9) as well as future vaults (9a, 10, 11); excluding the waste already emplaced in vaults 8 and 9, this provides an overall capacity of around 263,000m³. Imports of LLW into the county over the Plan period are estimated to be around 135,000m³; exports are estimated to be approximately 37,800 m³. This figure is based on extrapolation of current volumes of wastes transferred from Sellafield to alternative routes such as incineration, metal decontamination/melting and VLLW disposal. Therefore, there is sufficient capacity at the Repository over the Plan period.</p> <p>4.22 Sellafield Ltd anticipate generation of some 96,000m³ of VLLW over the Plan period; two thirds of this volume (61,000m³) is planned to be disposed of to its on-site landfill facility, Calder Landfill Extension Segregated Area (CLESA). The remaining 35,000m³ is expected to be consigned as VLLW for disposal at an authorised landfill, which is likely to be outside of the county. The CLESA facility at Sellafield, which can only accept the site's own VLLW, has a total capacity of 120,000m³ and a remaining capacity of 63,000m³. It is estimated that the CLESA will be full by 2025, but it is planned that a successor will be developed.</p>		

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			<p>4.23 Large volumes of VLLW arise annually at nuclear sites, which are generally sent for disposal to permitted landfill, if suitable, at the earliest opportunity after they are generated. For example, in 2015/16 6092m³ VLLW from waste producers across the UK was disposed to suitably permitted landfill sites and, additionally, 3736m³ was disposed by Sellafield to the CLESA. There is one permitted commercial landfill site in the county that is able to accept VLLW – the FCC Environment site at Lillyhall. The planning permission allows disposal of VLLW at the site until 2029, with a limit of 26,000m³ annually; to date, none has been disposed of to Lillyhall. It is difficult to forecast the volume of VLLW that might be imported into the county during the Plan period, since VLLW would only be imported if it was to be disposed of to the Lillyhall facility. It is considered that there is sufficient capacity to manage or dispose of VLLW in the county over the Plan period.</p> <p>4.24 Paragraph 17.7 considers the implementation and monitoring framework for the Local Plan, and expects that one of the main documents to be used to provide evidence on the Plan's performance will be the UK Radioactive Waste Inventory, which is updated every 3 years. The annual Authority Monitoring Report will also provide an opportunity to monitor radioactive waste facilities the capacity to manage the wastes and progress. The monitoring framework will include triggers concerning radioactive waste, which would indicate when a full or partial review of the Plan may be required.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 4.</p>		
MM21	42	Paragraph 4.28	<p>Insert new sentence at the beginning this paragraph, to read:</p> <p>“Proposals for the management of radioactive waste should also comply with national strategies for waste management and for radioactive waste management specifically, in the latter case including those produced by the Nuclear Decommissioning Authority. The County Council would....”</p>	To aid clarity	No significant sustainability effects or changes required to the SA Report

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MM22	42	Policy SP4 Transparent decision making	<p>Add a new bullet at the end of policy SP4 as follows:</p> <ul style="list-style-type: none"> “the proximity principle the national strategy for managing radioactive wastes” 	To aid clarity	No significant sustainability effects or changes required to the SA Report
MM23	44	Paragraphs 4.35 and 4.36, new following paragraph	<p>Amend the final two sentences of paragraph 4.35, to read:</p> <p>“The CLESA has a remaining capacity of approximately 70,000m³, so it is expectedscheduled to be full around 2025. Sellafield Ltd is, therefore, already carrying out feasibility studies into where CLESA-2 may be located; this will be a future on or near site disposal facility.”</p> <p>Amend paragraph 4.36, to read:</p> <p>“Sellafield Ltd is also working on a Development of Sellafield Decommissioning Strategy, which will set out a critical path of what activities have to occur when and where, in order to carry out an effective and efficient decommissioning programme. The site currently has many spatial constraints, so the strategy will look at all the NDA-owned land adjacent to Sellafield, for its potential to accommodate the temporary clean waste storage of non-radioactive inert wastes, subject to any covenants or special provisions that would restrict this suggested use of the land. Non-radioactive inert wastes are generated from the such as construction, demolition or excavation activities on Sellafield, which fall under the legal definition of waste; they would be retained for restoration purposes on the Sellafield complex, rather than importing large volumes of inert wastes for this purpose, in the future. wastes. Both the CLESA-2 work and the decommissioning strategy work, tie in with the Local Plan’s site allocation CO32 land adjacent to Sellafield (see chapter 18), and this will have to provide a more flexible approach for Sellafield’s future needs than solely for the disposal or storage of radioactive wastes.”</p> <p>Insert new paragraph 4.37, to read:</p> <p>“The Local Plan identifies site CO32, land adjacent to Sellafield, in</p>	To provide clarity on the policy approach to site CO32	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			Policy SAP3 (see chapter 18). This has been allocated to take account of the likely needs identified in paragraphs 4.35 and 4.36, to provide the opportunity for use of this land, in the event that Sellafeld Ltd has demonstrated, after rigorous assessment, that it is not feasible to use land within the Sellafeld site (allocation CO36), in accordance with Policy SP4, or that it is not feasible to utilise an existing disposal route.”		
MM24	44	Paragraph 4.39	Amend the last sentence of this paragraph, to read: “The County Council recognises that the nuclear industry operators will undertake that rigorous assessment, in the form of the optioneering process to assess the available management options for radioactive waste, which is then reviewed by the regulators. Also part of the rigorous assessment, but the Council would wish to see clear evidence of how those management decisions are have been formulated, in order for the Council to safeguard, through planning decisions, the interests of Cumbria’s communities and environmental assets.”	To provide clarity on the County Council’s definition of rigorous assessment	No significant sustainability effects or changes required to the SA Report
MM25	48	Policy SP6 Higher activity radioactive wastes	Add a new bullet at the beginning of Policy SP6 as follows: <ul style="list-style-type: none"> • “that it conforms to national policies and strategies for HAW; and • compliance with.....” 	To aid clarity and to ensure consistency with Policy SP5	No significant sustainability effects or changes required to the SA Report
MM26	53	Paragraph 5.18	Amend paragraph 5.18 as follows: “...national policy requires landbanks of at least 10 years for crushed rock and at least 7 years for sand and gravel (calculated on 10-year rolling averages and other relevant local data) to be maintained throughout the Plan period.”	To ensure consistency with the NPPF	No significant sustainability effects or changes required to the SA Report
MM27 a	53	Following paragraph 5.18 and Table 5.2	Insert new paragraph 5.19, to read: “The Cumbria Local Aggregates Assessment (LAA) provides an annual assessment of the demand for, and supply of, aggregates. Chapter 3 of the 2015 LAA discusses options for forecasting future	To provide context on the link between the Local Plan and the Local Aggregates Assessment	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>demand; the options presented were based on different ways of looking at past sales and forecasting future demands based on those past sales. Tables 5.3 to 5.5 provide a summary of the requirements based on the options considered. However, it should be noted that the LAA will be updated annually and these figures are likely to change in the future, in accordance with market demand and permitted reserves. Any planning application should be based on the most up-to-date LAA and not the figures presented here.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 5.</p>		
MM27 b	53	Following new paragraph 5.19	<p>Insert three new Tables: Table 5.3: Requirements for sand and gravel Table 5.4: Requirements for limestone Table 5.5: Requirements for High/Very High Specification Aggregates <i>(see Annex for new Tables)</i></p> <p>There will be consequent changes to the numbering of the Tables that follow in chapter 5.</p>	To provide an overview of current aggregates requirements in Cumbria	No significant sustainability effects or changes required to the SA Report
MM28	61	Paragraph 5.56	<p>Amend paragraph 5.56 as follows:</p> <p>“....are required to ensure that at least a 7-year landbank remains in place throughout the Plan period.”</p>	To ensure consistency with the NPPF	No significant sustainability effects or changes required to the SA Report
MM29 a	62	Following paragraph 5.61	<p>Insert new paragraphs 5.62 and 5.63, to read:</p> <p>“5.62 The reserves at Birkshead mine can be split into three separate types, each with a separate product and use (see Table 5.10). The reserves of the mill rock and plaster grade gypsum have been estimated based on the results of exploratory boreholes and anticipated recovery factors (the pillar sizes and hence extraction rate is based on the depth of working). The reserves of mill rock were reassessed in 2016, following the decision to make significant capital investment of £6.5 million at Birkshead; new cutting equipment should enable access to areas of the mine with steeper gradients, to extract</p>	To provide the context for gypsum, as an industrial mineral, in Cumbria	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>greater reserves than previously calculated.</p> <p>5.63 In the Table, the 'sufficient until' dates are based on projected outputs. This is a very broad indication of likely requirements over the Plan period, as any number of changes in circumstances could impact on these figures – for example, another recession or the under performance of the new equipment."</p>		
MM29 b	62	Following new paragraph 5.62	<p>Insert new Table 5.10: Birkhead Mine gypsum reserves at 31 December 2015 (see Annex 1 for new Table)</p>	To provide the context for gypsum, as an industrial mineral, in Cumbria	No significant sustainability effects or changes required to the SA Report
MM30	63	Paragraph 5.64	<p>Add text to paragraph 5.64 and split into two paragraphs, to read:</p> <p>"5.64 National policy requires mineral planning authorities to plan for a 25-year landbank for brick clay; however, this is not a practical option in Cumbria. Output from High Greenscoe Quarry has significantly reduced due to the recession and a planning permission to extend the life of the permission to 2028 was approved in 2013. On current extraction rates and remaining permitted reserves, a very rough estimate of the landbank is 37 years. There is, however, a very varied extraction rate of mudstone year-on-year. In the 10-year period between 2007 and 2016, days worked have ranged from 12 to 41; at no point has it reached the permitted 66 days. If the quarry were to extract the maximum amount required to produce bricks at full capacity (10.5 million bricks), then on current reserves, the landbank may only last 12.5 years. If, however, production were to fall back to their lowest levels, the landbank could last for 82 years.</p> <p>5.65 Whilst it is difficult to predict the rate of extraction and life of existing or proposed resources, a strategic policy commitment to identify site(s) to enable continued extraction of brick-making mudstones, and to identify an area next to the existing quarry as a strategic area (policy SP98), have been included. Brick clay is included as a Mineral Safeguarding Area in policy SP87."</p>	To provide the context for brick-making mudstones in Cumbria	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
MM31	63	Paragraph 5.65 and following new paragraph	<p>Amend paragraph 5.65, to read:</p> <p>“Some aggregate quarries also market high purity industrial grade limestone; but these are not included in the figures for sales of aggregates. Although currently inactive, the most notable of these quarries is Shap Fell, which used to supply the steel industry's lime kilns at the nearby Hardendale Works; there is a current planning application for a further 5.2 million tonnes of industrial limestone that would, if approved, provide around seven years stock of permitted reserves, which although a very low stock, would take advantage of the adjacent kilns and may potentially be required for other associated industrial facilities. Stainton Quarry, near Barrow, has an international market for industrial limestones that are used in pharmaceuticals and paper-making; here, the industrial grade limestone lies below that extracted for aggregates. Two other quarries are known to dedicate a small percentage of their limestone reserves for industrial uses, in their case, agricultural purposes. Policy SP10 aims to conserve industrial limestone resources for such purposes, to reflect current national policy.”</p> <p>Insert new paragraph 5.66, to read:</p> <p>“The broad estimate of the permitted reserves of industrial limestone, outside the National Park, is 1.85 million tonnes with all the quarries having an end date of 2042. Looking at sales for these four quarries, based on current sales levels, the 1.85 million tonnes could last around 140 years; based on both 3-year and 5-year rolling averages, it could last around 120 years. It is not considered that their scale of production warrants a Preferred Area or an Area of Search for industrial minerals alone; all these quarries are located within the general limestone Mineral Safeguarding Area and, therefore, the Mineral Consultation Area. Policy SP10 aims to maintain a steady and adequate supply of industrial limestone throughout the Plan period, to reflect current national policy.”</p>	<p>To ensure consistency with the NPPF</p> <p>To provide the context for industrial minerals in Cumbria</p>	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

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MM32	65	Paragraph 5.72	Insert new text at the end of this paragraph, to read: “...and limestone; the other nine quarries do not produce aggregates from their waste, as their waste rock is usually stored on site, for its future or progressive restoration.”	To provide clarity on the uses of building stone waste	No significant sustainability effects or changes required to the SA Report
MM33 a	65	Following paragraph 5.72; paragraphs 5.73 and 5.74; following new paragraphs	Insert new paragraph 5.73, to read: “5.73 The winning, working and processing of building stones make an important contribution to the minerals sector and the economy of Cumbria; they are also important for rural enterprise and diversification of small farms or other businesses. Building stones are used in existing buildings for restoration, conservation and extensions, as well as for new building, decorative and memorial work. Their use is integral to the distinctive character and historic environment of Cumbria and further afield. It is vital to ensure that a steady and adequate supply of building stones is available so that the local character of the county is maintained. The Plan provides a positive and flexible policy framework to support investment in appropriate sites, facilities and skills.” Amend paragraph 5.73 and split over two paragraphs; insert new paragraphs 5.75, 5.76 and 5.78: “ 5.73 5.74 Table 13 in Appendix 24 shows that 11 of the operational building stone quarries have planning consents that expire during the Plan period. Due to the often small scale, slow and intermittent nature of the building stone quarries in Cumbria, it is not anticipated that there will be a need for additional quarries during the Plan period. It is more likely that time extensions and small scale physical extensions will be sought, but all applications, for whatever use of the stone, will be considered on their own merits, in accordance with Policy DC2 and the criteria set out in Policy DC12. 5.75 Policy SP9 identifies the Wray Castle slate formation around Kirkby Slate Quarry, which has an international market and is of a	To provide the context for building stones in Cumbria	Neither implementation of the Plan's policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>much larger scale than all the other building stone quarries, as a strategic area for further supplies of slate, outside the National Park. However, the quarry was granted planning permission in November 2016, giving it a permitted area of 111 hectares, and reserves that now equate to around 1.4 million tonnes of workable stone/slate. Processing occurs at Kirkby Slate Quarry for all of Burlington's building stone quarries, whilst sales from all their quarries are quoted as 100,000 to 110,000 tonnes per annum, in the form of tiles, paving, walling, lintels, construction and landscaping materials, internal polished products and aggregates. To get an idea of scale, the next largest building stone quarry is 8.5 hectares, at Flinty Fell Quarry.</p> <p>5.76 Excluding Kirkby Slate, the average size of a building stone quarry in Cumbria, outside the National Parks, is 2 hectares. The volume of permitted reserves range from 5,000 to 1,000,000 tonnes, though this does not include calculation of waste rock that is often retained on site for restoration, which can range from 10 to 80% of the total extracted. Sales per annum also have a wide range; of the known sales figures, this is between 0 and 10,000 tonnes. For some building stone quarries, only the maximum permitted sales are known, but site monitoring often shows that these maximums are not reached. Of course, low sales can change and in most cases are shown to be rising since the recession, but because of this situation, the majority of planning permissions since 2007 for the building stone quarries have been time rather than physical extensions.</p> <p>5.77 Development control policy DC12 supports national planning policy to maintain supplies of building stone, <i>whether</i> required for the repair of national and, potentially, international heritage assets, <i>and also</i> to maintain Cumbria's local architectural distinctiveness, <i>or for a wide range of other uses.</i> All <i>P</i>proposals <i>at building stone quarries that are unrelated to historic assets or local vernacular,</i> will be assessed using the criteria for non-energy minerals in policy DC12.</p>		

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>5.78 Apart from slate, current building stone operations are located within the limestone and sandstone Mineral Safeguarding Areas; there are no operations using igneous rock for building stone purposes. The full range of building stones will be safeguarded from non-minerals development by the igneous, limestone and sandstone Mineral Safeguarding Areas, and thus the Mineral Consultation Area. Table 5.11 overleaf, provides an overview of the current building stone quarries in Cumbria, outside the National Parks; Part 2 of the Policies Map, Mineral Safeguarding Areas, identifies their locations.</p> <p>5.74 No need for additional building stone quarries is anticipated, due to the often slow and intermittent use of such quarries. However, policy SP8 identifies the Wray Castle slate formation around Kirkby Slate Quarry, which has an international market, as a strategic area for further supplies of slate, outside the National Park."</p> <p>There will be consequent changes to the Policies Map Part 2, Mineral Safeguarding Areas, to add identification of current building stone quarries.</p>		
MM33 b	66	New Table in Building Stones section	Insert new Table 5.11: Building Stone Quarries in Cumbria (outside the National Parks) (see Annex 1 for new Table)	To provide the context for building stone in Cumbria	No significant sustainability effects or changes required to the SA Report
MM34	67	Paragraph 5.78	Amend the first sentence of this paragraph, to read: "The Mineral Safeguarding Areas, identified in policy SP8 7 and on the Policies Map, are for: sand and gravel, hard rock (including aggregates, high specification aggregates, industrial minerals and building stones), shallow coal and fire clay, brick clay, gypsum and slate resources."	To provide clarity on the range of minerals encompassed by hard rock	No significant sustainability effects or changes required to the SA Report
MM35	77	Policy SP7 Minerals provision and safeguarding	Amend and add text in Policy SP7; split policy into two policies. " Policy SP7 Minerals provision and safeguarding	To ensure consistency with the NPPF	Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>Provision for potential further mineral working will be made by identifying Preferred Areas and/or Areas of Search:-</p> <ul style="list-style-type: none"> to enable a landbank at the Local Aggregates Assessment level of at least seven years sales for sand and gravel and at least ten years for crushed rock to be maintained throughout the Plan period; for continued quarrying a steady and adequate supply of nationally important very high specification roadstone and regionally important high specification roadstone; for continued quarrying a steady and adequate supply of brickmaking mudstones; for continued quarrying a steady and adequate supply of slate; and for continued extraction a steady and adequate supply of gypsum; and for a steady and adequate supply of building stone. <p>Policy SP8 Minerals safeguarding</p> <p>Mineral resources, existing, planned and potential infrastructure and plant will be safeguarded from being unnecessarily sterilised by other developments by identifying:-</p> <ul style="list-style-type: none"> existing and potential railheads and wharves to be safeguarded; Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources (including aggregates, high specification aggregates, industrial minerals and building stones), shallow coal and fireclay resources; Mineral Safeguarding Area for identified resources of brick clay; Mineral Safeguarding Areas for the remaining gypsum resources; Mineral Safeguarding Area for identified resources of slate; Mineral Safeguarding Area for identified resources of secondary aggregates; 		<p>Therefore, there are no significant sustainability effects or changes required to the SA Report, but Table 4.2, Table 4.3 and Appendix 3 will need updating now that Policy SP7 has been split into two policies. See Annex A to this SA Report update.</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<ul style="list-style-type: none"> Mineral Consultation Area, which covers the resources within all the Mineral Safeguarding Areas.” <p>All references in the Plan to Policy SP7 and new Policy SP8 will require amendment. There will be consequent changes to the numbering of the Policies that follow.</p>		
MM36	78	Policy SP10 Industrial limestones	<p>Amend the first sentence of this policy, to read:</p> <p>“To ensure a steady and adequate supply, Any proposal for the extraction of high purity limestone should demonstrate that it is primarily for non-aggregate uses.”</p>	To aid clarity and to ensure consistency with the NPPF	No significant sustainability effects or changes required to the SA Report
MM37	100, 101, 102	Policy SP14 Environmental assets	<p>Amend the final two sections of this policy, to read:</p> <p>“Heritage designations</p> <p>Major In general, development proposals that adversely impact substantially harm or totally destroy the Outstanding Universal Value of a World Heritage Sites, Scheduled Monuments, Registered Historic Battlefields, Registered Historic Parks and Gardens, Listed Buildings and Conservation Areas, or the significance of a designated heritage asset, or their settings, will only be granted planning permission in exceptional or wholly exceptional circumstances (in accordance with paragraph 132 of the National Planning Policy Framework) and where it can be demonstrated that there they are necessary to achieve substantial public benefits that outweigh the harm or loss (in accordance with NPPF paragraph 133).</p> <p>Where development proposals cause less than substantial harm to the Outstanding Universal Value of a World Heritage Site or the significance of a designated heritage asset, or their setting, the harm will be weighed against the public benefits of the proposals (in accordance with NPPF paragraph 134).”</p> <p>“Environmental assets not protected by national, European or international legislation</p>	To aid clarity and ensure consistency with the NPPF	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>Where not otherwise.....</p> <ul style="list-style-type: none">offsetting actions <p>Where not otherwise protected by national, European or international legislation, the effect of a development proposal on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect, directly or non-directly, non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset. Non-designated heritage assets of national importance are treated as designated assets.”</p>		
MM38	103	Policy SP15 Restoration and afteruse	<p>Amend Policy SP15 as follows:</p> <p>“POLICY SP15 Restoration and afteruse aftercare”</p> <p>“...of this Plan. Where appropriate, †this should include consideration.....”</p>	To aid clarity and ensure consistency with the NPPF	No significant sustainability effects or changes required to the SA Report
MM39	105	Following paragraph 10.7	<p>Insert new paragraph 10.8, to read:</p> <p>“In accordance with chapter 27, paragraph 48 of PPG (ID:27-048-20140306), where an operator is contributing to an established mutual funding scheme, such as the Mineral Products Association Restoration Guarantee Fund or the British Aggregates Association Restoration Guarantee Fund, no financial guarantee, even in the exceptional circumstances set out in Policy SP16, will be sought.”</p>	To aid clarity and ensure consistency with Planning Practice Guidance	No significant sustainability effects or changes required to the SA Report
MM40	105	Policy SP16 Section 106 planning obligations	<p>Amend policy, to read:</p> <p>“Where it is not possible to achieve the necessary control or outcome through the use of planning conditions, the County Council will require appropriate mitigation to be secured through Section 106 planning obligations that ensure that development proposals:-</p>	To aid clarity and ensure consistency with the NPPF	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability</p>

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			<p>1. Secure long term management of relevant environmental assets.</p> <p>2. Only where one of the following exceptional circumstances applies, provide financial guarantees, including with parent companies, where appropriate for restoration works, except where a national industry guarantee fund will remain in place:</p> <ul style="list-style-type: none"> very long-term new projects, where progressive reclamation is not practicable, such as an extremely large limestone quarry; or where a novel approach or technique is to be used, but the minerals planning authority considers it is justifiable to give permission for the development; or where there is reliable evidence of the likelihood of either financial or technical failure, but these concerns are not such as to justify refusal of permission. <p>3. Provide necessary infrastructure such as highway and transport improvements, flood and surface water management schemes and green infrastructure.”</p>		effects or changes required to the SA Report
MM41	117	Policy DC2 General criteria	<p>Amend policy to remove following text:</p> <p>“b. the cumulative effects of multiple impacts from individual sites and/or a number of sites in the locality have been taken into account;”</p>	To remove duplication across policies	No significant sustainability effects or changes required to the SA Report
MM42	117	Policy DC2 General criteria	<p>Insert new criterion b., to read:</p> <p>“b. the proposal would not give rise to significant adverse impacts upon local air quality, particularly within an Air Quality Management Area (AQMA) designated by the district authority;”</p>	To provide clarity on the policy approach to air quality management	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>
MM43	119	Policy DC4 Quarry blasting	<p>Amend second paragraph of this policy, to read:</p> <p>“Generally, ground vibration attributable to quarry blasting shall not exceed peak particle velocities of 6mm/second in any direction at</p>	To provide flexibility in the policy	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			sensitive properties, unless robust justification is provided.”		Therefore, there are no significant sustainability effects or changes required to the SA Report
MM44	121	Policy DC6 Cumulative environmental impacts	Amend first paragraph of this policy, to read: “Cumulative impacts of minerals and waste development proposals will be assessed in the light of other land-uses in the area. Where appropriate, considerations will include:”	To provide flexibility in the policy	No significant sustainability effects or changes required to the SA Report
MM45	124	Policy DC8 Renewable energy use and carbon reduction on existing minerals and waste sites	Insert a new bullet as bullet number 6, to read: <ul style="list-style-type: none"> in the case.....operations of the site: and proposals involving one or more wind turbine will need to demonstrate that: <ul style="list-style-type: none"> the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and, therefore, the proposal has their backing; and 	To ensure consistency with the June 2015 Ministerial Statement regarding wind turbines	Neither implementation of the Plan's policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report
MM46	125	Paragraph 14.5 and following new paragraph	Amend this paragraph, to read: “ No requirements for additional The 2015 Waste Needs Assessment considers waste managed in Cumbria, rather than locally arising as was assessed in the 2014 WNA, and thus the identified need for hazardous waste management is low. capacity in Cumbria have been identified in the Waste Needs Assessment for this Local Plan, and, Therefore, no Site Allocations are included in the Plan and no development control policies specific to hazardous waste are proposed in the Plan.” Insert new paragraph 14.6, to read:	To provide clarity on the policy approach to hazardous waste in the Plan	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>“Hazardous waste facilities are considered specialist and tend to be larger than local in scale; therefore, it is more appropriate that they are developed in locations that are easily accessible from major road or rail networks. This would limit the areas in Cumbria where such facilities could be developed. Currently, hazardous waste tends to be exported over the county border to facilities in neighbouring areas; however, this does not mean that such facilities should not be developed locally. Policy DC9 provides the criteria by which hazardous waste development should be considered, if any proposals were forthcoming. Facility types a., b., d., e. and f. could handle all major waste streams including hazardous. The only additional criteria for hazardous waste would be the exclusion of sites located in areas of high flood risk; of the locations for waste management facilities identified in SAP2, those that would be suitable for processing hazardous waste are not located within such flood risk areas.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 14.</p>		
MM47	125	Paragraph 14.6	<p>Amend the second sentence of this paragraph, to read:</p> <p>“No additional development control policies specific to these wastes are considered necessary, but if a proposal came forward on a nuclear site, all relevant development control policies would be used to determine the application; unlike conventional waste streams, no specific development control policy has been prepared for radioactive wastes.”</p>	To provide clarity	No significant sustainability effects or changes required to the SA Report
MM48	126, 127, 128	Policy DC9 Criteria for waste management facilities	<p>Amend first paragraph of this policy, to read:</p> <p>“Proposals for waste management facilities for all waste streams excluding radioactive, will be permitted subject to the locational and other criteria set out in the table below.”</p>	To provide clarity	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
					required to the SA Report
MM49	126, 127, 128	Policy DC9 Criteria for waste management facilities	Amend Policy DC9 as follows: Add “If no unacceptable impacts on housing, business uses or other sensitive land uses” into Key Criteria for facility types e. and g.	To ensure consistency within the policy	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report
MM50	129	Policy DC10 Criteria for landfill and landraise	Amend first paragraph of policy, to read: “Proposals for additional landfill capacity will only be permitted if they comply with Strategic Policy SP3 Waste capacity, and will be required to demonstrate the measures that have been taken to drive the wastes up the waste hierarchy, to reduce waste road miles, and to have comprehensive landfill gas management systems, including electricity generation where viable.”	To remove duplication	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report
MM51	131	Paragraph 15.4	Amend paragraph, to read: “Policy DC12 relates to aggregates, industrial minerals, building stones, gypsum and any other non-energy producing minerals. ‘Building stone’ is used generically to cover all uses for building stones, whether for internal decoration, outside walling, etc.; the term ‘dimension’ stone’ is often used by the industry. As well as consideration under the criteria in the policy, building stone quarries are highlighted in the second part of the policy for particular, smaller scale roles. Cumbria represents an area of highly varied geology, and the various rock types present have been used extensively to construct its unique assemblage of vernacular stone buildings and, in some cases, have been exported to markets located much further afield (both national and international); this is reflected in the flexible approach in DC12, to the need for stone with very specific	To provide clarity on the approach to building stones	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			characteristics. Therefore, Cumbria's building stone quarries have a unique role to play in the conservation and repair of heritage assets or in the matching of stone in local developments. This policy would equally apply to applications associated with the stone products/processing industry within Cumbria, outside the National Parks."		
MM52	131	Policy DC12 Criteria for non-energy minerals development	<p>Amend policy, to read:</p> <p>"Proposals for non-energy minerals development inside both the identified Preferred Areas and the identified Areas of Search, will be permitted if they do not conflict with other policies in this Plan.</p> <p>Proposals for non-energy minerals development outside both the Preferred Areas and Areas of Search, whether a physical or time extension to an existing site or a new site, will be considered on their individual merits.</p> <p>Criteria to be considered are:</p> <ul style="list-style-type: none"> a. the need for the specific mineral; b. economic considerations; c. positive and negative environmental impacts (including a strategic approach); d. the cumulative impact of proposals in an area; e. land stability." 	<p>To remove duplication within policies</p> <p>To provide clarity on the policy approach to Areas of Search</p>	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>
MM53	132	Paragraph 15.6	<p>Amend paragraph, to read:</p> <p>"The determination of planning applications for oil and gas minerals is based on NPPF paragraph 14, which is incorporated into this Local Plan as Strategic Policy SP1; it requires that consent is granted unless the adverse impacts significantly and demonstrably outweigh the benefits of the proposal when assessed against the policies of the Plan taken as a whole development proposals that accord with the development plan are approved without delay. Only where there are</p>	To ensure consistency with the NPPF	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			no policies relevant to the application or where relevant policies are out of date, does the policy require that the Council grant permission, unless material considerations indicate otherwise. Such a decision would need to take into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or if specific policies in that Framework indicate that development should be restricted. The Government states that unconventional gas development can benefit the economy by “improving security of supply, creating jobs, growth and investment, and supporting the transition to a low carbon economy at the least cost”.		
MM54	135, 136	Policy DC13 Criteria for energy minerals	<p>Amend Policy DC13, to read:</p> <p>“Proposals for energy minerals developments that conform to the Strategic and other Policies of this Local Plan will be supported subject to the following criteria:</p> <p>Exploration and appraisal of hydrocarbons</p> <p>Planning permission will be granted for proposals for exploration and appraisal of oil and gas resources provided that:</p> <p>a. the site and equipment is sited at a location where it can be demonstrated that it will not have any unacceptable social and environmental impacts; and</p> <p>b. the proposal provides for appropriate baseline monitoring prior to commencement of development; and</p> <p>c. the impacts of the development have been considered in relation to impact on climate change; and</p> <p>d. the timely restoration and subsequent aftercare of the site, whether or not oil or gas is found.</p> <p>Commercial exploitation of hydrocarbons</p>	<p>To ensure consistency within the policy</p> <p>To ensure consistency with national policy</p>	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>Planning permission will be granted for proposals for commercial exploitation of oil and gas, provided that:</p> <p>a. a full appraisal programme for the oil or gas field has been completed;</p> <p>b. the proposed location is the most suitable, taking into account social, environmental, geological and technical factors;</p> <p>c. the cumulative impacts of the development of the gas field and essential associated infrastructure have been assessed; and</p> <p>d. appropriate provision is made for mitigation or compensation for significantly adverse impacts on the environmental and communities social impacts; and</p> <p>e. the impact of the development has been considered in terms of contributing to the mitigation of climate change.</p> <p>Combined planning applications for more than one phase will only be considered if all relevant information, including environmental information, to support the full extent of the application is provided.</p> <p>Underground Coal Gasification</p> <p>The criteria set out above in this policy, for exploration and appraisal and commercial exploitation, will also apply to proposals for onshore surface works or ancillary development to support offshore Underground Coal Gasification (UCG). Where a UCG proposal follows a planning permission for coal extraction only, a separate planning application will be required for development related to UCG.</p> <p>Coal</p> <p>Planning applications for coal extraction will only be granted where;</p> <ul style="list-style-type: none"> the proposal would not have any unacceptable social or environmental impacts is environmentally acceptable; or, if not it can be made so by planning conditions or obligations; or, if not it provides national, local or community benefits which clearly 		

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>outweigh the likely impacts to justify the grant of planning permission.</p> <p>For underground coal mining, potential impacts to be considered and mitigated for will include the effects of subsidence including: the potential hazard of old mine workings; the treatment and pumping of underground water; monitoring and preventative measures for potential gas emissions; and the disposal of colliery spoil. Provision of sustainable transport will be encouraged, as will Coal Mine Methane capture and utilisation.”</p>		
MM55	137	Paragraph 15.26	<p>Add a final sentence to the end of this paragraph, to read:</p> <p>“Notwithstanding the fact that these environmental designations are, in effect, safeguarding these two slag banks, previous trials to use the slag as a secondary aggregate have shown them not to be economically viable.”</p>	To provide clarity on the policy approach to slag banks	No significant sustainability effects or changes required to the SA Report
MM56	137	Paragraph 15.27	<p>Amend the last sentence of this paragraph, to read:</p> <p>“In the meantime, it was decided to remove the specific building stone MSA; however, the resources from which building stones are or may be obtained in the future (igneous rock, limestone and sandstone), are safeguarded through the relevant Mineral Safeguarding Areas and, therefore, the Mineral Consultation Area.”</p>	To provide clarity	No significant sustainability effects or changes required to the SA Report
MM57	141	Following paragraph 16.5	<p>Insert new paragraphs 16.6 and 16.7, to read:</p> <p>“16.6 NPPF paragraph 117 requires planning policies to identify and map components of the local ecological networks. As set out in paragraph 8.11 of the Plan, within Cumbria, the detailed representation of current knowledge of the county's biodiversity is held by the Cumbria Biodiversity Data Centre (CBDC). Its evidence base includes species and habitat statements, habitat targets, planning considerations and enhancement opportunities. Further work for the biodiversity evidence base will include identifying the networks of natural habitats required by national policies, mapping biodiversity</p>	To provide clarity on the policy approach to ecological networks	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>opportunities and defining the landscape features that are of major importance for migration, dispersal and genetic exchange. This is an iterative process that will continue to inform the policy and thus any necessary updates.</p> <p>16.7 In a two-tier authority area such as Cumbria, it is considered that the local ecological networks can be better mapped at the District scale; the CBDC data is available to all relevant Councils. For further information, reference should be made to all District and Borough Council draft or adopted Policies Maps.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 16.</p>		
MM58	142	Policy DC16 Biodiversity and geodiversity	<p>Amend the first bullet of this policy, to read:</p> <p>“Proposals for minerals and waste developments, including ones for ROMP applications and time extensions, will be required to identify, where appropriate:-</p> <ul style="list-style-type: none"> their likely any potential impacts on important biodiversity and geological conservation assets, as defined in the Strategic Policies, and on any functional ecological and green infrastructure networks; and” 	To provide flexibility in the policy	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>
MM59	143, 144	Policy DC17 Historic environment	<p>Amend Policy DC17 as follows:</p> <p>“In accordance with NPPF paragraphs 126 to 141:</p> <p>Minerals and waste management developments, including restoration and afteruse, will, where necessary, preserve and, where appropriate, enhance Cumbria’s heritage assets and their settings. Any such pProposals for waste management developments or mineral developments that would result in harm to, or total loss of, the significance of a designated heritage asset or its setting (or a non-designated heritage asset of national significance, or its setting) that is demonstrably of equivalent importance to a designated heritage asset, or its setting, or the Outstanding Universal Value of a World Heritage</p>	To ensure consistency with the NPPF	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>Site, will only not be permitted unless where it can be clearly demonstrated that public benefits outweigh the harm, and that the harm is necessary to achieve those public benefits. , in cases of less than substantial harm to the significance of assets, or substantial public benefits, in cases of substantial harm to the significance of assets.</p> <p>Any proposals that cause substantial harm to the outstanding universal value of the Frontiers of the Roman Empire – Hadrian’s Wall World Heritage Site, a Scheduled Monument, a grade I or II* Listed Building, the Solway Moss Registered Battlefield or a grade I or II* Registered Park and Garden, will only be permitted in wholly exceptional circumstances. Proposals that cause substantial harm to a grade II Listed Building, a grade II Registered Park and Garden and a Conservation Area, will only be permitted in exceptional circumstances.</p> <p>Any proposals that affect a non-designated heritage asset or its setting will be judged on the significance of the heritage asset, and the scale of the harm and the public benefits of the proposal.</p> <p>Where a development proposal affecting archaeological sites is acceptable in principle, the preservation of the remains in situ will be the preferred solution. Where in situ preservation is not possible or justified, the development will be required to make adequate provision for excavation and recording before or during development.</p> <p>Any heritage asset and its setting, whether designated or not, that is harmed by a proposal, will need to be recorded by the developer to a level that is proportionate to its significance and to the scale of impact of the proposal. The information will need to be made publically accessible in the County’s Historic Environment Record.</p> <p>All development pProposals that will have an impact on any heritage asset or its setting (including where there is potential for unknown archaeological assets), whether designated or not, should be</p>		

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			accompanied by an assessment of the significance of the heritage asset and its setting , and how that significance will be affected by the proposed development. The level of information required will be proportionate to the asset's significance of the asset and to the scale of impact of the proposal, and may require, where necessary, an archaeological desk based assessment and field investigation. The recording of the loss of, or harm to, any heritage assets (where justified), and any supporting information, will need to be made publically accessible in the County's Historic Environment Record."		
MM60	151	Paragraph 16.38	Amend paragraph 16.38 as follows: "Soils are a vital, natural resource, that form the foundation of much of the county's landscape, land use and wildlife interests and serve a wide range of essential functions. Soils are also a "carbon sink" that can either sequester or emit carbon, depending on their condition and temperature. The Soil Strategy for England sets out an ambitious programme of actions to improve the protection and sustainable use of soils (irrespective of their Agricultural Land Classification grading). These cover cross-cutting issues relating to the different function of soils, protecting soils through the planning system and minimising contamination. The Natural Environment White Paper ⁵ emphasises the importance of natural resource protection, including the conservation and sustainable management of soils. This covers the protection of Best and Most Versatile agricultural land, as well as safeguarding soils in order to achieve a range of important ecosystem services and functions, such as food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife."	To ensure consistency with the most up-to-date and relevant national guidance on soils	No significant sustainability effects or changes required to the SA Report
MM61	153	Paragraph 16.49	Amend the first sentence of this paragraph, to read: " Whilst s Sites on the Best and Most Versatile agricultural land should usually be restored, where practicable and appropriate, to retain its	To ensure consistency with the NPPF and PPG	No significant sustainability effects or changes required to the SA Report

⁵ The Natural Environment White Paper, The Natural Choice: securing the value of nature, Defra, June 2011

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			longer term capability a similar standard , though the proposed afteruse need not always be for agriculture. In appropriate situations, other uses will be encouraged that contribute to the movement from a net loss of biodiversity towards achievement of net gains in biodiversity resources, required by Strategic Policy SP14".		
MM62	155	Policy DC22 Restoration and afteruse	Amend the title of Policy DC22 as follows: "POLICY DC22 Restoration and afteruse aftercare"	To ensure consistency with the NPPF	No significant sustainability effects or changes required to the SA Report
MM63	156	Paragraph 17.4	Add a final bullet point to this paragraph, to read: <ul style="list-style-type: none"> radioactive waste arisings and management methods. 	To ensure that radioactive waste is appropriately considered in implementation and monitoring	No significant sustainability effects or changes required to the SA Report
MM64	157	Paragraph 17.7	Amend paragraph, to read: "Monitoring data will be drawn from a wide range of sources, but three four main documents will be used to provide evidence on the Plan's performance. Firstly, the annual Local Aggregates Assessment will give a rolling picture of aggregate reserves and associated landbanks. Secondly, the Waste Needs Assessment gives a snapshot in time of the quantity of waste arising in the county, as well as the capacity of the waste management network to deal with that waste. Thirdly, the UK Radioactive Waste Inventory gives a snapshot in time of radioactive wastes and nuclear materials. Fourthly, the Annual Authority Monitoring Report assesses the overall performance of the Plan in terms of:"	To ensure that radioactive waste is appropriately considered in implementation and monitoring	No significant sustainability effects or changes required to the SA Report
MM65	157	Table 17.1	Amend table to include organisations, roles and responsibilities concerning the implementation of the Plan with regard to radioactive wastes (see Annex 1 for amended table)	To ensure that radioactive waste is appropriately considered in implementation and	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
				monitoring	
MM66	158	Paragraphs 17.9, 17.10, 17.11	<p>Amend paragraphs, to read:</p> <p>“17.9 A monitoring schedule has been prepared (see Appendix 3), which shows how the Plan will be monitored in relation to its policies. However, the County Council will also seek to monitor other elements relating to the Local Plan and its implementation, including site allocations, national infrastructure projects, time extensions to permissions at key facilities, minerals and waste production and their cross-border movements, although recognising that, at present, the availability of this information is limited. Therefore, a further monitoring schedule is set out as Table 17.2, which shows how the Plan will be monitored in relation to these non-policy events.</p> <p>17.10 The policy monitoring schedule sets clear objectives, with, where possible, targets and indicators that are Specific, Measurable, Achievable and Realistic and, where appropriate, Time bound (SMART). The matrix will; it also identifies trigger points at which it is appropriate to address any issues emerging. The non-policy monitoring schedule is simpler, consisting of a non-exhaustive list, but also sets out triggers, of which there is a very wide range; generally, these non-policy triggers form Contextual Indicators. These measure background events and circumstances that have a bearing on policy performance – the social, economic and environmental context in which the Plan and its policies operate.</p> <p>17.11 As set out in paragraph 17.7, the monitoring process involves preparation of the annual Authority Monitoring Report, the annual Local Aggregates Assessment and the biennial Waste Needs Assessment, all of which use data gathered from planning permissions, site monitoring visits, case officers, nationally available data, etc., as well as reference to the UK Radioactive Waste Index. These Annual Monitoring Reports will highlight any implementation problems, and the need for the strategic approach, policies or site allocations to be reviewed.</p>	To clarify the monitoring and implementation process	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>17.12⁴ The Local Plan is intended to be a robust document, suitable for setting the direction of development locally for the next 15 years. Nevertheless, changing conditions may be so significant as to require a review or partial review of the Local Plan, including, potentially, a call for new minerals or waste sites. <i>This latter example, may only take the form of a public consultation on alternative sites and then an Addendum to the Plan; however, every circumstance will be different and judged on its impacts at the time of arising.</i></p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 17.</p>		
MM67	159	Following paragraph 17.11	Insert new <i>Table 17.2: Non-policy monitoring schedule (see Annex 1 for new Table)</i>	To provide context on the range of triggers for a full or partial review of the Local Plan	No significant sustainability effects or changes required to the SA Report
MM68	164	Policy SAP1 HWRCs	<p>Insert a sentence at the beginning of this policy, to read:</p> <p><i>“Appropriate applications at the following sites will be supported:”</i></p>	To provide clarity	No significant sustainability effects or changes required to the SA Report
MM69 a	164	Paragraph 18.5	<p>Amend this paragraph, to read:</p> <p>“In accordance with Policy SP3, Policy SAP2 identifies seven sites to accommodate a need for three additional facilities during the Plan period, as predicted by the Waste Needs Assessment. The sites may be required for mixed recycling, materials recovery, transfer stations or thermal treatments (Energy from Waste). It is not considered that all the sites allocated would be suitable for the whole range of waste management facilities; an indication of which sites are suitable for what uses is <i>set out in Table 18.X</i>included in the Site Assessments document. The table excludes: HWRCs, as these are covered within SAP1; landfill, as no such sites are allocated; and composting, <i>because if</i> a replacement composting facility is required for either</p>	To set the context for new Table 18.1 on the suitability of the site allocations for the range of waste management facilities	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			Hespin Wood or Thackwood, as discussed in paragraph 3.59, that may require an alternative location to be considered under policy DC9 (Criteria for waste management facilities)."		
MM69 b	164	Following paragraph 18.5	Insert a new Table 18.1: Suitability of waste facility types (see <i>Annex 1 for new Table</i>)	To illustrate the type of facilities suitable for the site allocations	No significant sustainability effects or changes required to the SA Report
MM70	164	Policy SAP2 Waste treatment and management facilities	Insert a sentence at the beginning of this policy, to read: "The following sites are identified as suitable, in principle, for waste management facilities, in line with the waste facility types listed in Table 18.1. Proposals on the allocated sites for other facility types, not listed within the table, shall be assessed against Policy DC9."	To provide clarity	Neither implementation of the Plan's policies nor site allocations will be affected by this clarification. Therefore, there are no significant sustainability effects or changes required to the SA Report
MM71	164	Policy SAP2 Waste treatment and management facilities	Insert a new section at the end of this policy, to read: "Broad Areas The following existing industrial estates have the potential to support further waste management provision, if facilities are appropriate to the type and scale of estate, and proposals conform to other relevant policies of the Plan: BRO1 Lillyhall Industrial Estate, Workington BRO2 Sowerby Wood Estate, Barrow BRO3 Park Road Estate, Barrow BRO4 Gilwilly Industrial Estate, Penrith BRO5 Kingmoor Park Rockcliffe Estate, Carlisle"	To clarify support for appropriate waste proposals at existing industrial estates in Cumbria	The identified Broad Areas have been added to the Policy and will be shown on the Policies Map. The modification will not give rise to a significant sustainability effect, but additions will be required to the 2016 SA Report – Table 6.1, Table 6.4, Table 8.2 and Appendix 5. See updated tables and scoring matrices shown in Annex A to this SA Report update.

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
MM72	164	Paragraph 18.6	<p>Amend this paragraph, to read:</p> <p>“It is acknowledged that it may be possible to demonstrate a need for additional waste treatment or management facilities on unallocated sites and, therefore, it is not intended to use policy SAP2 restrictively. The Broad Areas were identified as industrial areas, where waste facilities already exist, where waste arises from existing industries or where waste could be used as a resource; the list set out in SAP2 is not exhaustive, as opportunities for additional or improved waste management provision may come forward at other, new or existing, employment or industrial estates. SuchAny proposals on unallocated sites will be considered against if they conform to all other relevant policies in this Plan, and if they would meet an identified need in a timely manner.”</p> <p>In order to comply with national policy, the Broad Areas will be added to the Policies Map, Part 1 Site Allocations.</p>	To provide the context for appropriate waste proposals at industrial areas in Cumbria	<p>The identified Broad Areas have been added to the Policy and will be shown on the Policies Map. The modification will not give rise to a significant sustainability effect, but additions will be required to the 2016 SA Report – Table 6.1, Table 6.4, Table 8.2 and Appendix 5.</p> <p>See updated tables and scoring matrices shown in Annex A to this SA Report update.</p>
MM73	167	Paragraphs 18.18 and 18.19	<p>Amend paragraph 18.18, to read:</p> <p>“The CLESA at Sellafield is licenced only to take Sellafield’s VLLW and LA-LLW; it has a remaining capacity for disposal of approximately 70,000m³, which means that it is due to closeexpected to be full around 2025. There has been some assessment undertaken on the capability of the 280ha Sellafield complex to accommodate facilities for managing LLW from its own decommissioning activities. Firstly, Sellafield Ltd carried out a feasibility study into where a future on or near site disposal facility (CLESA-2) may be located, and it is anticipated that a more detailed scoping study will commence during FY 2017/18. It is understood that the initialThe conclusion is that there is no capacity within that complex at present, but there are possible sites on adjacent land to the east, owned by the Nuclear Decommissioning Authority. To reflect this, a strategic assessment of land adjacent to Sellafield (site allocation CO32) was carried out by the County Council in a site allocations deliverability study. This did not highlight any major planning constraints of that study or any future</p>	To provide greater clarity on the policy approach to CLESA-2	<p>The modification will not give rise to a significant sustainability effect, but additions will be required to the 2016 SA Report. It is considered necessary to separate the radioactive and non-radioactive waste potential uses for the site, which affect: Table 6.1, Table 6.4, Table 8.2 and Appendix 5.</p> <p>See updated tables and scoring matrices shown in Annex A to this SA Report update.</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>assessments will determine the opportunity or otherwise to accommodate CLESA-2 within the Sellafeld complex (site CO36). Where it has been demonstrated by rigorous assessment that it is not feasible to use land within CO36 in accordance with Policy SP4, or to utilise existing disposal routes, then consideration may be given to the use of land outwith CO36. 18.19Secondly, Sellafeld Ltd is working on the Development of Sellafeld Decommissioning Strategy (see paragraph 4.4236) as the site currently has so many spatial constraints.”</p> <p>Amend the rest of paragraph 18.19, to read:</p> <p>“As the site currently has so many spatial constraints, it is likely that an additional LLW disposal facility will be developed near to Sellafeld, rather than onsite, within the Plan period. However, pPolicy SAP3 safeguards the Sellafeld complex for continued LLW treatment (such as compaction) and management (consignment to appropriate treatment, storage or disposal routes), as well as continued HAW treatment (such as vitrification) and storage, in site allocation CO36. The policy also identifies the Sellafeld complex as an area offer potential consideration offfor additional capacity for the disposal or storage of a range of radioactive wastes, subject to planning permission, should a proposal come forward within the Plan period.”</p>		
MM74	167, 168	Paragraphs 18.21, 18.22, 18.23	<p>Amend these paragraphs, to read:</p> <p>“18.21 The Local Plan identifies site CO32, land adjacent to Sellafeld, in Policy SAP3 to provide the opportunity for use of land in the event that it has been demonstrated, after rigorous assessment, that it is not feasible to use land within CO36, in accordance with Policy SP4, or to utilise existing disposal routes. As part of the rigorous assessment, Sellafeld Ltd will need to demonstrate how they are meeting the requirements of Policy SAP3. As well as the potential for this Subject to meeting the requirements of policies SP4 and SAP3, site allocation (CO32) to be considered is identified for the potential development of a CLESA-2 and, it also has the potential for</p>	To provide greater clarity on the policy approach to use of land adjacent to the Sellafeld complex (site allocation CO32)	The modification will not give rise to a significant sustainability effect, but additions will be required to the 2016 SA Report. It is considered necessary to separate the radioactive and non-radioactive waste potential uses for the site, which affect: Table 6.1, Table 6.4, Table 8.2 and Appendix 5.

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>temporary long or short-term storage of non-radioactive inert wastes arising during the demolition or excavation stages of decommissioning, linked to an approved Sellafield site decommissioning strategy. The non-radioactive inert wastes would be used in association with the phased restoration of site CO36, in accordance with the decommissioning strategy. Furthermore, it is intended that there is a flexible approach to this allocation, whereby any needs identified by Sellafield Ltd. for space to temporarily store clean waste, arising during the demolition or excavation stages of decommissioning, could also be accommodated.</p> <p>18.22 To reduce the wider impacts (such as noise, visual and transport) of any development on CO32, there is potential for this land to the east of Sellafield to be accessed from within the existing Sellafield nuclear licensed site, thus reducing wider impacts and allowing for integration or expansion of existing, suitable installations and/or facilities. Policy SAP3 identifies this site allocation for potential consideration of additional capacity for radioactive waste disposal or storage, should a proposal come forward within the Plan period.</p> <p>18.23 It is considered that the Low Level Waste Repository, the Sellafield complex and land adjacent to it, can provide adequate capacity for the treatment, management, storage and/or disposal of appropriate levels of radioactive waste or non-radioactive inert wastes within Cumbria, subject to planning permission, throughout the Plan period.”</p>		See updated tables and scoring matrices shown in Annex A to this SA Report update.
MM75	168	Policy SAP3 Radioactive wastes treatment, management, storage and disposal	<p>Amend this policy, to read:</p> <p>“Unless it can be demonstrated that it is no longer required, the capacity for the treatment, management, storage and/or disposal of currently permitted radioactive wastes will be safeguarded over the Plan period at the following existing sites:</p> <ul style="list-style-type: none"> • Sellafield complex (including former Windscale site) • Low Level Waste Repository 	To provide greater clarity on the policy approach to use of land adjacent to the Sellafield complex (site allocation CO32)	The modification will not give rise to a significant sustainability effect, but additions will be required to the 2016 SA Report. It is considered necessary to separate the radioactive and non-radioactive waste potential uses for the site,

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<ul style="list-style-type: none"> Lillyhall Studs metal processing complex (Cyclife) Lillyhall landfill <p>The following sites are considered to be suitable locations for additional capacity, subject to the granting of planning permission:</p> <p>CO32 Land adjacent to Sellafield</p> <p>CO35 The Low Level Waste Repository, near Drigg</p> <p>CO36 Land within Sellafield</p> <p>Subject to the granting of planning permission, the following site is considered to be a suitable location to provide additional capacity for:</p> <ul style="list-style-type: none"> - the storage of non-radioactive inert wastes from the Sellafield complex (CO36); - the treatment, management and/or storage of appropriate levels of lower activity radioactive waste from CO36; - the disposal of lower activity radioactive waste from CO36 that would previously have been disposed in CLESA. <p>Proposals for development on the following site will be required to demonstrate that:</p> <ul style="list-style-type: none"> there is a clear need that cannot be met within CO36, or via the use of other existing disposal routes; how the need is to be met; the use of any part of CO32 is proportionate in terms of scale, timescale and footprint; direct access is provided from site CO36, where appropriate. <p>CO32 Land adjacent to Sellafield”</p>		<p>which affect: Table 6.1, Table 6.4, Table 8.2 and Appendix 5.</p> <p>See updated tables and scoring matrices shown in Annex A to this SA Report update.</p>
MM76	169	Following paragraph 18.26	<p>Insert new paragraph 18.27, to read:</p> <p>“The existing Roose Quarry and the proposed Preferred Area for its future extension (M27) lie adjacent to existing gas terminals. Recent</p>	To provide clarity on the policy approach to site M27	Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			<p>engineering work at the terminals has led to consolidation of gas processing at the north terminal, which is closest to M27, and this is likely to have increased the risks at this terminal. The results of the new safety case for gas processing, being prepared for the Health & Safety Executive, are not scheduled for issue until 2017. Whilst it is acknowledged that this consolidation, and perhaps future operations on the terminals estate, may impact upon the feasibility of M27 to be worked for sand and gravel, the County Council consider that this is an important site that will help to provide an adequate and steady supply of this mineral over the Plan period; therefore, the site has been retained as a strategic allocation. However, a clear and robust monitoring framework has been developed, which would trigger a review of the Local Plan, if necessary, once the information becomes available regarding the feasibility of the site for future minerals extraction. Any review of the Plan could lead to the removal of this site or to the consideration of a smaller area, as appropriate.”</p> <p>There will be consequent changes to the numbering of the paragraphs that follow in chapter 18.</p>		<p>The site will either be available, partly available or wholly unavailable for future extraction, but this will not affect the scoring, the conclusions or the mitigation for the site.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>
MM77	169	Paragraph 18.29	<p>Amend paragraph and title, to read:</p> <p><i>Slate and other building stones</i></p> <p>Other than for slate, there are currently no specific allocations of Policy SP7 does not include a requirement for Preferred Areas and/or Areas of Search for all local building stones, as the detailed evidence required to support such an exercise is not available. within Policy SP7. —does, however, require tThe sole allocation of an Area of Search such areas specifically for slate, is to ensure the steady and adequate supply of slate its continued quarrying, and also requires a Mineral Safeguarding Area for identified resources of this mineral. Policy SP9 8 identifies the area around Kirkby Slate quarry as a strategic location for this resource within the Plan area; however, following planning permission granted in November 2016, and policy SAP4 no longer accordingly identifies an Area of Search at the quarry.</p>	To provide clarity on the policy approach to slate and building stones	<p>Neither implementation of the Plan's policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			Proposals for other building stone quarries will be supported where they meet the criteria set out in Policy DC12 of the Plan.		
MM78	170	Following paragraph 18.33	<p>Insert new paragraph 18.34, to read:</p> <p>“Policy SAP4 identifies both Preferred Areas and Areas of Search for a range of quarries in Cumbria, which will enable a steady and adequate supply of these minerals over the Plan period. As set out in paragraph 5.84, the Preferred Areas are areas of known resources, where planning permission might reasonably be anticipated; such areas may also include essential operations associated with mineral extraction. Areas of Search are broader areas, where knowledge about mineral resources may be less certain, but within which planning permissions for particular sites could be granted, particularly if there is a potential shortfall in supply.”</p>	To aid clarity	<p>Neither implementation of the Plan’s policies nor site allocations will be affected by this clarification.</p> <p>Therefore, there are no significant sustainability effects or changes required to the SA Report</p>
MM79	170	Policy SAP4 Areas for minerals	<p>Insert new sentence at the beginning of this policy, to read:</p> <p>“To enable a steady and adequate supply of minerals: Preferred Areas are identified where there are known mineral resources; Areas of Search are identified where knowledge of the mineral resource is less certain.”</p>	To provide clarity	No significant sustainability effects or changes required to the SA Report
MM80	170	Policy SAP4 Areas for minerals	<p>Remove site allocation M14, to read:</p> <p>“M14 – land adjacent to Kirkby Slate Quarry, near Kirkby-in-Furness”</p> <p>There will be a consequent change to the Policies Map, Part 1 Site Allocations.</p>	To reflect the granting of planning permission in November 2016	No significant sustainability effects or changes required to the SA Report
MM81	172	Paragraph 18.38	<p>Amend paragraph, to read:</p> <p>“Policy SAP5 identifies twoone potential railheads, AL32 and M31. The siteformer was put forward during the MWDF process, in connection with the transport of coal. However, the associated coal site was rejected, but the potential railhead retained, as the large manufacturing companies located nearby could use a railhead for import of materials or export of products or waste. Site M31 at</p>	To reflect the unavailability of the site	No significant sustainability effects or changes required to the SA Report

Ref No.	Page No.	Paragraph/ Policy/ Figure/Map Table/Box	Proposed Main Modification	Reason for Proposed Modification	Significant impacts or changes to 2016 SA Report
			Salthouse near Millom, previously had a temporary planning permission, tied to the life of Ghyll Scaur Quarry, for an aggregate loading facility for the quarry; if necessary, this facility could be reinstated, after due consideration of any submitted planning application."		
MM82	173	Policy SAP5 Safeguarding of existing and potential railheads and wharves	<p>Add introductory paragraph, to read:</p> <p>"The following existing and potential railheads and wharves are safeguarded, in line with paragraph 143 of the NPPF."</p> <p>Remove following allocation:</p> <p>"M31 Salthouse, near Millom, potential sidings for Ghyll Scaur Quarry"</p> <p>There will be a consequent change to the Policies Map, Part 1 Site Allocations.</p>	<p>To provide clarity</p> <p>The site is to be restored to agriculture</p>	No significant sustainability effects or changes required to the SA Report

ANNEX A

Changes or additions required to the 2016 Sustainability Appraisal Report

Main Modification MM35 - split of Policy SP7 into two policies

1. Update required to Table 4.2: Summary of assessment of the Strategic Policies

SA OBJECTIVE		SP2: improved access	SP3: housing supply	SP4: Education and training	SP5: health and well-being	SP6: impact on the community	EN1: impact on biodiversity	EN2: impact on landscape	EN3: built environment	NR1: air quality and GHGs	NR2: water resources	NR3: soil resources and geodiversity	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Policy	Summary title															
SP7	Minerals provision and safeguarding									+			++	+		+
SP8	Minerals Safeguarding									+			++	+		+

2. Update required to Table 4.3: Conclusion of the assessments of the Strategic Policies

Policy SP7 Minerals provision ~~and safeguarding~~: The policy has a positive impact on a limited number of sustainability objectives, as its primary aim is to ensure a steady and adequate supply of mineral resources over the Plan period, ~~as well as the protection and unnecessary sterilisation of minerals resources in connection with non-minerals development that may be proposed~~. The policy is required for compliance with the NPPF, and its direct impact is provision of minerals resources ~~and protection of existing mineral resources and operations from being sterilised by new or nearby development~~. This works alongside policy DC15 of the MWLP, which sets out the mineral safeguarding policy, and Site Allocations Policies SAP4 and SAP5.

Policy SP8 Minerals safeguarding: The policy has a positive impact on a limited number of sustainability objectives, as its primary aim is to ensure the protection and unnecessary sterilisation of minerals resources in connection with non-minerals development that may be proposed. The policy is required for compliance with the NPPF, and its direct impact is the protection of existing mineral resources and operations from being sterilised by new or nearby development. This works alongside policy DC15 of the MWLP, which sets out the mineral safeguarding policy, and Site Allocations Policies SAP4 and SAP5.

3. Update required to 2016 SA Report Appendix 3

POLICY SP7: Minerals provision ~~and safeguarding~~

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

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

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

- ~~• Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources (including high specification aggregates) and shallow coal resources;~~
- ~~• Mineral Safeguarding Areas for the remaining gypsum resources;~~
- ~~• Mineral Safeguarding Area for identified resources of slate;~~
- ~~• Mineral Safeguarding Area for identified resources of secondary aggregates;~~
- ~~• Mineral Consultation Areas, which will cover the resources within the Mineral Safeguarding Areas.~~

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP1: To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices				No impact		0
SP3: To provide everyone	-To help meet local housing				No impact		0

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
with a decent home	need						
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health, e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people				No impact		0
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport				No impact		0
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources				No impact		0
EN2: To preserve, enhance and manage landscape quality and character for future generations	-Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity				No impact		0
EN3: To improve the quality of the built environment	-Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and				No impact		0

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	associated land use -Enhance the degraded urban and rural environment within the area						
NR1: To improve local air quality and reduce greenhouse gas emissions	-Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors	✓	✓	✓	Quite likely	The policy has limited scope for impact on this objective, but the safeguarding provisions provide a mechanism for protecting sustainable transport routes where available, and works with other policies in the Plan to consider sustainable transport.	+
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water				No impact		o
NR3: To restore and protect land and soil	-To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat				No impact		o
NR4: To manage mineral resources sustainability and minimise waste	-Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate rather than primary	✓	✓	✓	Inevitable	The policy seeks to ensure a steady supply of minerals in line with identified requirements. It works in tandem with Policy SP8 Minerals safeguarding, to will also help ensure mineral resources are safeguarded and not sterilised unnecessarily prior to non-minerals development taking place. This will ensure that a flow of minerals can be provided to meet demand within the area.	++

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	materials -Support use of co-products from minerals working						
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment	√	√	√	Quite likely	This policy will support growth in the minerals sector, which could lead to local job creation and to help maintain existing jobs within the minerals sector.	+
EC2: To improve access to jobs	-Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need				No impact		0
EC3: To diversify and strengthen the local Economy	-Stimulate private investment -Stimulate diversification within the waste management and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products	√	√	√	Quite likely	This policy will support growth in the minerals sector and would enable mineral extraction technologies to be developed and utilised.	+
Summary of Assessment							
<p>The policy has a positive impact on a limited number of sustainability objectives, as its primary aim is to ensure a steady and adequate supply of mineral resources over the Plan period, as well as the protection and unnecessary sterilisation of minerals resources in connection with non-minerals development that may be proposed. The policy is required for compliance with the NPPF, and its direct impact is provision of minerals resources and protection of existing mineral resources and operations from being sterilised by new or nearby development. This works alongside policy DC15 of the MWLP, which sets out the mineral safeguarding policy, and Site Allocations Policies SAP4 and SAP5.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary Impact - the policy should help ensure that there are sufficient minerals to support the growth strategy for the county. The policy should also help minimise the transportation of minerals, which should help to improve air quality and climate change objectives.</p> <p>Cumulative - none identified</p> <p>Synergistic - none identified</p>							
Mitigation Proposed							
None							

POLICY SP8: Minerals safeguarding

Mineral resources, existing, planned and potential infrastructure and plant will be safeguarded from being unnecessarily sterilised by other developments by identifying:-

- existing and potential railheads and wharves to be safeguarded;
- Mineral Safeguarding Areas for the indicative sand and gravel and hard rock resources (including aggregates, high specification aggregates, industrial minerals and building stones) and shallow coal resources;
- Mineral Safeguarding Areas for the remaining gypsum resources;
- Mineral Safeguarding Area for identified resources of slate;
- Mineral Safeguarding Area for identified resources of secondary aggregates;
- Mineral Consultation Areas, which will cover the resources within the Mineral Safeguarding Areas.

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP1: To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		o
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices				No impact		o
SP3: To provide everyone with a decent home	-To help meet local housing need				No impact		o
SP4: To improve the level of skills, education and training	-Education and training				No impact		o
SP5: To improve the health and sense of well being of people	-Impact on human health, e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people				No impact		o

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	<ul style="list-style-type: none"> -community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport 				No impact		o
EN1: To protect and enhance biodiversity	<ul style="list-style-type: none"> -Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources 				No impact		o
EN2: To preserve, enhance and manage landscape quality and character for future generations	<ul style="list-style-type: none"> -Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity 				No impact		o
EN3: To improve the quality of the built environment	<ul style="list-style-type: none"> -Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 				No impact		o
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable 	√	√	√	Quite likely	The policy has limited scope for impact on this objective, but the safeguarding provisions provide a mechanism for protecting sustainable transport routes where available, and works with other policies in the Plan to consider sustainable transport.	+

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	energy sources -promote climate change adaptation in the minerals and waste sectors						
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water				No impact		o
NR3: To restore and protect land and soil	-To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat				No impact		o
NR4: To manage mineral resources sustainability and minimise waste	-Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate rather than primary materials -Support use of co-products from minerals working	√	√	√	Inevitable	The policy seeks to ensure mineral resources are safeguarded and not sterilised unnecessarily prior to non-minerals development taking place. This will ensure that a flow of minerals can be provided to meet demand within the area.	++
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment	√	√	√	Quite likely	This policy will support growth in the minerals sector, which could lead to local job creation and to help maintain existing jobs within the minerals sector.	+
EC2: To improve access to jobs	-Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need				No impact		o

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
EC3: To diversify and strengthen the local Economy	-Stimulate private investment -Stimulate diversification within the waste management and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products	√	√	√	Quite likely	This policy will support growth in the minerals sector and would enable mineral extraction technologies to be developed and utilised.	+
Summary of Assessment							
<p>The policy has a positive impact on a limited number of sustainability objectives, as its primary aim is to ensure the protection and unnecessary sterilisation of minerals resources in connection with non-minerals development that may be proposed. The policy is required for compliance with the NPPF, and its direct impact is the protection of existing mineral resources and operations from being sterilised by new or nearby development. This works alongside policy DC15 of the MWLP, which sets out the mineral safeguarding policy, and Site Allocations Policies SAP4 and SAP5.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary Impact - the policy should help ensure that there are sufficient minerals to support the growth strategy for the county. The policy should also help minimise the transportation of minerals, which should help to improve air quality and climate change objectives.</p> <p>Cumulative - none identified</p> <p>Synergistic - none identified</p>							
Mitigation Proposed							
None							

Main Modifications MM71 and MM72 – addition of identified Broad Areas to Policy SAP2 and supporting text

1. Update required to Table 6.1: Summary of the assessments of the Site Allocation Policies SAP1, SAP2, SAP3

SA OBJECTIVE			SP2: improved access	SP3: housing supply	SP5: health and well-being	SP6: impact on the community	EN1: impact on biodiversity	EN2: impact on landscape	EN3: built environment	NR1: air quality and GHGs	NR2: water resources	NR3: soil resources and geodiversity	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Allocation	District	Function														
AL37 Lillyhall	Allerdale	HWRC	-		+(+)	+	+	++	++	(+)/-	++	+(+)	+			
SL1B Kendal Fell	S.Lakeland	HWRC	+		(+)	++	++	-	+ / (-)	+ / (-)						
AL3 Oldside	Allerdale	Treatment	++		+	(-)	-		(+)	(+)	?	+	++	+	+	?
AL8 Lillyhall	Allerdale	Treatment	+		+(+)	+	+	++	++	(+)	++	+(+)	++	(+)	+	?
AL18 Workington	Allerdale	Treatment	++		+	?	(-)		+	+	?	+	++	++	+	?
CA11 Willowholme	Carlisle	Treatment	+		+	(+)	-	?	-	+ / -	-	+	+	+(+)	(+)	?
CA30 Kingmoor Rd	Carlisle	Treatment	+		-(-)	(-)	-	-	(-)	?	-	-	+	(+)	+	?
CA31 Kingmoor Pk	Carlisle	Treatment	+(+)		++	(+)	+	(+)	+(+)	+	(+)	+(+)	+	+	+	?
CO11 Bridge End	Copeland	Treatment	+		(-)		?	?	+ / -	+	(-)	(+) / -	(+)	+	+	
BRO1 Lillyhall	Allerdale	Broad Areas for Treatment	+(+)		+(+)	+	+	++	++	(+)	++	+(+)	++	(+)	+	?
BRO2 Sowerby Woods	Barrow		+(+)		+(+)	(+)	+	++	++	(+)	++	+(+)	++	(+)	+	?
BRO3 Park Road	Barrow		+(+)		+(+)	(+)	+	++	++	(+)	++	+(+)	++	(+)	+	?
BRO4 Gilwilly	Eden		+(+)		+(+)	(+)	+	+(+)	++	+	++	+(+)	++	(+)	+	?
BRO5 Kingmoor Park Rockcliffe	Carlisle		+		+(+)	(+)	+	+(+)	++	+	++	+(+)	++	(+)	+	?
CO32 adj.Sellafield	Copeland	Radwaste			-(-)		-(-)	(-)	-	+(+)	-	-	+(+)	(+) / ?		
CO35 LLWR	Copeland	Radwaste	+(+)		?		-			(+)	-		+	(+)		
CO36 Sellafield	Copeland	Radwaste			?		-		(+)	(+)	-	?	++	(+)		

2. Update required to Table 6.4: Conclusions of the site assessments

Broad Areas identified in policy SAP2

<p><i>BRO1 Lillyhall Industrial Estate (Broad Area - treatment):</i> An existing industrial estate, where waste facilities already exist and where waste arises from existing industries; opportunities should be explored for developments on site that could use waste as a resource. The identification of Lillyhall Industrial Estate as a Broad Area does not imply that all waste management proposals on site would be acceptable, they would be considered against all relevant policies in the Local Plan. Well located in relation to the primary road network, and close to the main towns of Workington and Whitehaven, as well as several Key Service Centres. The Coal Authority states that ground stability considerations will be necessary in this area of former mining activity.</p>
<p><i>BRO2 Sowerby Woods Estate (Broad Area - treatment):</i> An existing, mixed business and industrial estate, where waste facilities already exist and where waste arises from existing industries; opportunities should be explored for developments on site that could use waste as a resource. The identification of Sowerby Woods Estate as a Broad Area does not imply that all waste management proposals on site would be acceptable, they would be considered against all relevant policies in the Local Plan. Well located in relation to the primary road network, and close to the Principal Service Centre of Barrow, as well as several Key Service Centres.</p>
<p><i>BRO3 Park Road Estate (Broad Area - treatment):</i> An existing, mixed business and industrial estate, where waste facilities already exist and where waste arises from existing industries; opportunities should be explored for developments on site that could use waste as a resource. The identification of Park Road Estate as a Broad Area does not imply that all waste management proposals on site would be acceptable, they would be considered against all relevant policies in the Local Plan. Well located in relation to the primary road network, and close to the Principal Service Centre of Barrow, as well as several Key Service Centres.</p>
<p><i>BRO4 Gilwilly Industrial Estate (Broad Area - treatment):</i> An existing, mixed business and industrial estate, where waste facilities already exist and where waste arises from existing industries; opportunities should be explored for developments on site that could use waste as a resource. The identification of Gilwilly Industrial Estate as a Broad Area does not imply that all waste management proposals on site would be acceptable, they would be considered against all relevant policies in the Local Plan. Good location in relation to the primary road network, and on the outskirts of Penrith.</p>
<p><i>BRO5 Kingmoor Park Rockcliffe Estate (Broad Area - treatment):</i> An existing, mixed business and industrial estate, where waste facilities already exist and where waste arises from existing industries; opportunities should be explored for developments on site that could use waste as a resource. The identification of Kingmoor Park Rockcliffe Estate as a Broad Area does not imply that all waste management proposals on site would be acceptable, they would be considered against all relevant policies in the Local Plan. Moderate location in relation to the primary road network, and close to the Principal Service Centre of Carlisle City.</p>

3. Update required to Table 8.2: Summary of mitigation proposals suggested for Site Allocations arising from SA process

Site	Mitigation Proposed
BRO1 Lillyhall Industrial Estate (Broad Area - treatment)	<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> • Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. • Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. • Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination).
BRO2 Sowerby Woods Estate (Broad Area - treatment)	<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> • Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. • Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. • Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination).
BRO3 Park Road Estate (Broad Area - treatment)	<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> • Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. • Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. • Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination).
BRO4 Gilwilly Industrial Estate (Broad Area - treatment)	<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> • Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. • Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. • Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination).
BRO5 Kingmoor Park Rockcliffe Estate (Broad Area - treatment)	<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> • Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses.

Site	Mitigation Proposed
	<ul style="list-style-type: none"> Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination).

4. Update required to 2016 SA Report Appendix 5

SITES IDENTIFIED IN POLICY SAP2 FOR WASTE TREATMENT AND MANAGEMENT FACILITIES

BRO1 – Lillyhall Industrial Estate – Broad Area

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
SP1:To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices	✓	✓	✓	Very likely	Expansion of the range of facilities could be beneficial in providing additional options for managing wastes arising along the western and north western coastal fringe at a fairly centrally located site with good road access. There is limited scope for modal shift unless a handling facility is developed in Workington Port (possibly serving the railhead also); however, the alternative would involve re-locating the existing uses to an alternative site where proximity to waste uses may result in new and greater adverse impacts.	+(+)
SP3:To provide everyone with a decent home	-To help meet local housing need				No impact		0
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors	✓	✓	✓	Very likely	Several waste uses are already grouped on the site and mitigation measures will be in place to limit or prevent impacts on nearby sensitive receptors. The need for additional measures will depend on	+(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
	-Impact on the sense of well being of people					the new waste uses; however, the priority appears to be for enclosed facilities that would clearly limit the risks of certain impacts. Given the location, issues of well-being are primarily concerned with other development on the estate and are addressed in comments on Objectives EC1 to EC3.	
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport	✓	✓	✓	Very likely	The assessment is positive insofar as there are no recreational, cultural or heritage assets in the vicinity and thus the provision of additional facilities here could avoid development in other locations, where such impacts might arise.	+
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources	✓	✓	✓	Limited likelihood	The estate is close to various biodiversity designations and there are areas nearby known to be used by species affording varying levels of protection. The main issue is whether any additional activities would generate cumulative or new impacts, recognising that they would be limited if new uses are enclosed.	+
EN2: To preserve, enhance and manage landscape quality and character for future generations	-Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity	✓	✓	✓	Limited impact very likely	The estate is distant from any heritage designations and would broaden the range of waste activities on the site within an existing industrial area. The estate is visible from high ground to the east, but visual impact should be limited given the existing surrounding uses and provided any new structures are not out of keeping (in terms of elevation particularly) with those already on the estate and surrounding plots.	++
EN3: To improve the quality of the built environment	-Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use	✓	✓	✓	Limited impact very likely	No impact on heritage assets (noting that this is not a mineral site). Estate is in lowest flood risk zone. The priority is for new enclosed facilities that would limit the risk of external impacts when used in conjunction with the existing mitigation applied across the estate. Provided new enclosed facilities are housed in structures similar in scale and design to those already on the estate, there should be no visual degradation of the area, though perceptual issues are	++

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
	-Enhance the degraded urban and rural environment within the area					commented on in the assessments of Objectives EC1 to EC3.	
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors 	✓	✓	✓	Quite likely	<p>Installation of enclosed facilities will limit new and cumulative dust and emissions impacts.</p> <p>Strategic Objective 3 requires waste to be managed as close as practicable to sources. Centralising facilities inevitably increases 'waste miles' compared to dispersing facilities to each main settlement, but this could mean the sites handle so little local waste that they are not economically viable.</p> <p>It therefore seems sensible to seek to concentrate additional facilities on a fairly centrally located site where suitability for waste use is already established, recognising that the economic constraints referred to above mean some increase in 'waste miles' is inevitable.</p>	(+)
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water	✓	✓	✓	Quite to very unlikely	New facilities would be enclosed and therefore it is expected that existing mitigation of such impacts would be sufficient (with reconfiguration possibly) as some of them address impacts of open waste management uses.	++
NR3: To restore and protect land and soil	<ul style="list-style-type: none"> -To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat 	✓	✓	✓	Very unlikely	<p>There is potential for the estate to have areas of contamination from previous use. New structures may necessitate piling work and contamination impacts would need to be assessed beforehand and mitigated appropriately.</p> <p>This is a brownfield site with no recent agricultural use.</p>	+(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
NR4: To manage mineral resources sustainability and minimise waste	<ul style="list-style-type: none"> -Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate -Support use of co-products from minerals working 	✓	✓	✓	Very likely	Any increase of waste facilities on the estate would diversify waste management options, which will contribute to improved resource efficiency and landfill diversion. It is assumed that the priorities will reflect those stated in Strategic Policy SP4 (in turn reflecting the Waste Hierarchy) while at the same time addressing the county's identified waste management needs as stated in Strategic Policy SP3. Any additional facilities could include treatment plant though, ideally, capacity for re-use, recycling or re-processing (re-manufacture) of recyclates should be prioritised if they are feasible.	++
EC1: To retain existing jobs and create new employment opportunities	<ul style="list-style-type: none"> -Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment 	✓	✓	✓	Quite likely	Any increase of waste facilities on the estate would create new jobs, though this is unlikely to be significant as most new waste technologies are largely automated. Concerns have been raised that further waste development on the site could prejudice occupancy rates and opportunities to attract new investment in the estate, which is important for the coastal fringe economy. The likelihood of such risks cannot be judged in this assessment, but they would be significantly greater if the site was being proposed as new waste development rather than expansion of what is already there. Waste facilities will be judged inevitably as bad neighbours, but the NPPW acknowledges that they are a form of development that should be capable of sitting alongside other compatible industrial land uses.	(+)
EC2: To improve access to jobs	<ul style="list-style-type: none"> -Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need 	✓	✓	✓	Quite likely	Any incremental growth in jobs appears to support the second criterion. The site is accessible by public transport.	+
EC3: To diversify and strengthen the local Economy	<ul style="list-style-type: none"> -Stimulate private investment -Stimulate diversification within the waste and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products 	?	?	?	Unclear	See comments for Objective EC1.	?

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
Summary of Assessment							
<p>This site offers several benefits in concentrating expanded existing or new waste management facilities on an existing site, for which the suitability for waste use is already proven. The current and possible future waste uses need to be centrally located (i.e. serving a potentially wide catchment) in order to be economically viable, and it has to be accepted that this will mean some wastes have to travel over some distance for management. This does not necessarily mean that the allocation is in conflict with Strategic Objectives and Policies in the Plan, especially if it delivers capacity that does not exist in the county now, and which means that wastes that are currently being exported (generating considerably more ‘waste miles’) can be managed locally. This outcome is also likely to deliver modest employment growth. The nature of future waste use is not explicit, and any development would require comprehensive assessment of the likely cumulative effects, alongside impacts from existing waste and non-waste uses on the wider estate. The location is a little distant from the main settlements in the coastal fringe and this limits the likelihood of impacts on various sensitive receptors.</p> <p>The NPPW makes clear that waste facilities are appropriate development alongside other industrial land uses, provided they are mitigated satisfactorily and, in this case, recognising that wastes are already being managed on the site.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative; obvious potential for cumulative impacts from increased road traffic at the site and in the road network in the vicinity, and other generic impacts (odour, noise, dust, etc.) that accompany most waste management activities.</p> <p>Synergistic: impact will depend on the type of facilities that come forward. Co-location could mean some materials are recycled and treated on the same site, reducing waste miles, emissions and possibly the amount of waste landfilled.</p>							
Mitigation Proposed							
<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination). 							

BRO2 – Sowerby Woods Estate – Broad Area

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature / scale for each impact as necessary	
SP1:To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices	✓	✓	✓	Very likely	Expansion of the range of facilities could be beneficial in providing additional options for managing wastes arising along the coastal fringe at an edge of town, well located site with good road access. There is limited scope for modal shift unless a handling facility is developed in Barrow Port (possibly serving the railhead also); however, the alternative would involve re-locating the existing uses to an alternative site where proximity to waste uses may result in new and greater adverse impacts.	+(+)
SP3:To provide everyone with a decent home	-To help meet local housing need				No impact		0
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people	✓	✓	✓	Very likely	Several waste uses are already grouped on the site and mitigation measures will be in place to limit or prevent impacts on nearby sensitive receptors. The need for additional measures will depend on the new waste uses; however, the priority appears to be for enclosed facilities that would clearly limit the risks of certain impacts. Given the location, issues of well-being are primarily concerned with other development on the estate and are addressed in comments on Objectives EC1 to EC3.	+(+)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport	✓	✓	✓	Quite likely	The assessment is positive insofar as the provision of additional facilities here could avoid development in other locations, where greater impacts on community assets might arise. Consideration will need to be given to any increase in HGV traffic impacting on nearby leisure uses, such as Sandscale Hawes.	(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
EN1: To protect and enhance biodiversity	<ul style="list-style-type: none"> -Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources 	✓	✓	✓	Limited likelihood	The estate is close to various biodiversity designations and there are areas nearby known to be used by species affording varying levels of protection. The main issue is whether any additional activities would generate cumulative or new impacts, recognising that they would be limited if new uses are enclosed.	+
EN2: To preserve, enhance and manage landscape quality and character for future generations	<ul style="list-style-type: none"> -Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity 	✓	✓	✓	Limited impact very likely	The estate is distant from any heritage designations and would broaden the range of waste activities on the site within an existing industrial area. Visual impact should be limited given the existing surrounding uses and provided any new structures are not out of keeping (in terms of elevation particularly) with those already on the estate and surrounding plots.	++
EN3: To improve the quality of the built environment	<ul style="list-style-type: none"> -Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 	✓	✓	✓	Limited impact very likely	<p>No impact on heritage assets (noting that this is not a mineral site). Estate is in lowest flood risk zone.</p> <p>The priority is for new enclosed facilities that would limit the risk of external impacts when used in conjunction with the existing mitigation applied across the estate.</p> <p>Provided new enclosed facilities are housed in structures similar in scale and design to those already on the estate, there should be no visual degradation of the area, though perceptual issues are commented on in the assessments of Objectives EC1 to EC3.</p>	++
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change 	✓	✓	✓	Very likely	<p>Installation of enclosed facilities will limit new and cumulative dust and emissions impacts.</p> <p>Strategic Objective 3 requires waste to be managed as close as practicable to sources. Centralising facilities inevitably increases 'waste miles' compared to dispersing facilities to each main settlement, but this could mean the sites handle so little local waste that they are not economically viable.</p> <p>It therefore seems sensible to seek to concentrate additional facilities</p>	(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
	adaptation in the minerals and waste sectors					on a fairly well located site where suitability for waste use is already established, recognising that the economic constraints referred to above mean some increase in 'waste miles' is inevitable.	
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water	✓	✓	✓	Quite to very unlikely	New facilities would be enclosed and therefore it is expected that existing mitigation of such impacts would be sufficient (with reconfiguration possibly) as some of them address impacts of open waste management uses.	++
NR3: To restore and protect land and soil	-To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat	✓	✓	✓	Very unlikely	There is potential for the estate to have areas of contamination from previous use. New structures may necessitate piling work and contamination impacts would need to be assessed beforehand and mitigated appropriately. This is a brownfield site with no recent agricultural use.	+(+)
NR4: To manage mineral resources sustainability and minimise waste	-Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate -Support use of co-products from minerals working	✓	✓	✓	Very likely	Any increase of waste facilities on the estate would diversify waste management options, which will contribute to improved resource efficiency and landfill diversion. It is assumed that the priorities will reflect those stated in Strategic Policy SP4 (in turn reflecting the Waste Hierarchy) while at the same time addressing the county's identified waste management needs as stated in Strategic Policy SP3. Any additional facilities could include treatment plant though, ideally, capacity for re-use, recycling or re-processing (re-manufacture) of recyclates should be prioritised if they are feasible.	++
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment	✓	✓	✓	Quite likely	Any increase of waste facilities on the estate would create new jobs, though this is unlikely to be significant as most new waste technologies are largely automated. Further waste development on the site could prejudice occupancy rates and opportunities to attract new investment in the estate. The likelihood of such risks cannot be judged in this assessment, but they would be significantly greater if the site was being proposed as new waste development rather than expansion of what is already there. Waste facilities will be judged	(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination). 							

BRO3 – Park Road Estate – Broad Area

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
SP1:To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices	✓	✓	✓	Very likely	Expansion of the range of facilities could be beneficial in providing additional options for managing wastes arising along the coastal fringe at an edge of town, well located site with good road access. There is limited scope for modal shift unless a handling facility is developed in Barrow Port (possibly serving the railhead also); however, the alternative would involve re-locating the existing uses to an alternative site where proximity to waste uses may result in new and greater adverse impacts.	+(+)
SP3:To provide everyone with a decent home	-To help meet local housing need				No impact		0

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature / scale for each impact as necessary	
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people	✓	✓	✓	Very likely	Several waste uses are already grouped on the site and mitigation measures will be in place to limit or prevent impacts on nearby sensitive receptors. The need for additional measures will depend on the new waste uses; however, the priority appears to be for enclosed facilities that would clearly limit the risks of certain impacts. Given the location, issues of well-being are primarily concerned with other development on the estate and are addressed in comments on Objectives EC1 to EC3.	+(+)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport	✓	✓	✓	Very likely	The assessment is positive insofar as the provision of additional facilities here could avoid development in other locations, where greater impacts on community assets might arise. Consideration will need to be given to any increase in HGV traffic impacting on nearby leisure uses, such as Sandscale Hawes.	(+)
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources	✓	✓	✓	Limited likelihood	The estate is close to various biodiversity designations and there are areas nearby known to be used by species affording varying levels of protection. The main issue is whether any additional activities would generate cumulative or new impacts, recognising that they would be limited if new uses are enclosed.	+
EN2: To preserve, enhance and manage landscape quality and character for future generations	-Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity	✓	✓	✓	Limited impact very likely	The estate is distant from any heritage designations and would broaden the range of waste activities on the site within an existing industrial area. Visual impact should be limited given the existing surrounding uses and provided any new structures are not out of keeping (in terms of elevation particularly) with those already on the estate and surrounding plots.	++
EN3: To improve the quality of the built environment	-Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working	✓	✓	✓	Limited impact very likely	No impact on heritage assets (noting that this is not a mineral site). Estate is in lowest flood risk zone. The priority is for new enclosed facilities that would limit the risk of	++

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature / scale for each impact as necessary	
	-appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area					external impacts when used in conjunction with the existing mitigation applied across the estate. Provided new enclosed facilities are housed in structures similar in scale and design to those already on the estate, there should be no visual degradation of the area, though perceptual issues are commented on in the assessments of Objectives EC1 to EC3.	
NR1: To improve local air quality and reduce greenhouse gas emissions	-Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors	✓	✓	✓	Very likely	Installation of enclosed facilities will limit new and cumulative dust and emissions impacts. Strategic Objective 3 requires waste to be managed as close as practicable to sources. Centralising facilities inevitably increases 'waste miles' compared to dispersing facilities to each main settlement, but this could mean the sites handle so little local waste that they are not economically viable. It therefore seems sensible to seek to concentrate additional facilities on a fairly well located site where suitability for waste use is already established, recognising that the economic constraints referred to above mean some increase in 'waste miles' is inevitable.	(+)
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water	✓	✓	✓	Quite to very unlikely	New facilities would be enclosed and therefore it is expected that existing mitigation of such impacts would be sufficient (with reconfiguration possibly) as some of them address impacts of open waste management uses.	++
NR3: To restore and protect land and soil	-To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat	✓	✓	✓	Very unlikely	There is potential for the estate to have areas of contamination from previous use. New structures may necessitate piling work and contamination impacts would need to be assessed beforehand and mitigated appropriately. This is a brownfield site with no recent agricultural use.	+(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
NR4: To manage mineral resources sustainability and minimise waste	<ul style="list-style-type: none"> -Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate -Support use of co-products from minerals working 	✓	✓	✓	Very likely	Any increase of waste facilities on the estate would diversify waste management options, which will contribute to improved resource efficiency and landfill diversion. It is assumed that the priorities will reflect those stated in Strategic Policy SP4 (in turn reflecting the Waste Hierarchy) while at the same time addressing the county's identified waste management needs as stated in Strategic Policy SP3. Any additional facilities could include treatment plant though, ideally, capacity for re-use, recycling or re-processing (re-manufacture) of recyclates should be prioritised if they are feasible.	++
EC1: To retain existing jobs and create new employment opportunities	<ul style="list-style-type: none"> -Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment 	✓	✓	✓	Quite likely	Any increase of waste facilities on the estate would create new jobs, though this is unlikely to be significant as most new waste technologies are largely automated. Further waste development on the site could prejudice occupancy rates and opportunities to attract new investment in the estate. The likelihood of such risks cannot be judged in this assessment, but they would be significantly greater if the site was being proposed as new waste development rather than expansion of what is already there. Waste facilities will be judged inevitably as bad neighbours, but the NPPW acknowledges that they are a form of development that should be capable of sitting alongside other compatible industrial land uses.	(+)
EC2: To improve access to jobs	<ul style="list-style-type: none"> -Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need 	✓	✓	✓	Quite likely	Any incremental growth in jobs appears to support the second criterion. The site is accessible by public transport.	+
EC3: To diversify and strengthen the local Economy	<ul style="list-style-type: none"> -Stimulate private investment -Stimulate diversification within the waste and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products 	?	?	?	Unclear	See comments for Objective EC1.	?

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature / scale for each impact as necessary	
Summary of Assessment							
<p>This site offers several benefits in concentrating expanded existing or new waste management facilities on an existing site, for which the suitability for waste use is already proven. The current and possible future waste uses need to be well located to serve a potentially wide catchment, in order to be economically viable, and it has to be accepted that this will mean some wastes have to travel over some distance for management. This does not necessarily mean that the allocation is in conflict with Strategic Objectives and Policies in the Plan, especially if it delivers capacity that does not exist in the county now, and which means that wastes that are currently being exported (generating considerably more ‘waste miles’) can be managed locally. This outcome is also likely to deliver modest employment growth. The nature of future waste use is not explicit, and any development would require comprehensive assessment of the likely cumulative effects, alongside impacts from existing waste and non-waste uses on the wider estate.</p> <p>The NPPW makes clear that waste facilities are appropriate development alongside other industrial land uses, provided they are mitigated satisfactorily and, in this case, recognising that wastes are already being managed on the site.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative; obvious potential for cumulative impacts from increased road traffic at the site and in the road network in the vicinity, and other generic impacts (odour, noise, dust, etc.) that accompany most waste management activities.</p> <p>Synergistic: impact will depend on the type of facilities that come forward. Co-location could mean some materials are recycled and treated on the same site, reducing waste miles, emissions and possibly the amount of waste landfilled.</p>							
Mitigation Proposed							
<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination). 							

BRO4 – Gilwilly Industrial Estate – Broad Area

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP1:To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices	✓	✓	✓	Very likely	Expansion of the range of facilities could be beneficial in providing additional options for managing wastes arising in Eden. At an edge of town, well located, site with good road access. There is limited scope for modal shift unless a handling facility is developed at Penrith rail sidings; however, the alternative would involve re-locating the existing uses to an alternative site where proximity to waste uses may result in new and greater adverse impacts.	+(+)
SP3:To provide everyone with a decent home	-To help meet local housing need				No impact		0
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people	✓	✓	✓	Very likely	Several waste uses are already grouped on the site and mitigation measures will be in place to limit or prevent impacts on nearby sensitive receptors. The need for additional measures will depend on the new waste uses; however, the priority appears to be for enclosed facilities that would clearly limit the risks of certain impacts. Given the location, issues of well-being are primarily concerned with other development on the estate and are addressed in comments on Objectives EC1 to EC3.	+(+)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport	✓	✓	✓	Very likely	The assessment is positive insofar as the provision of additional facilities here could avoid development in other locations, where greater impacts on community assets might arise.	(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
EN1: To protect and enhance biodiversity	<ul style="list-style-type: none"> -Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources 	✓	✓	✓	Limited likelihood	The estate is close to various biodiversity designations and there are areas nearby known to be used by species affording varying levels of protection. The main issue is whether any additional activities would generate cumulative or new impacts, recognising that they would be limited if new uses are enclosed.	+
EN2: To preserve, enhance and manage landscape quality and character for future generations	<ul style="list-style-type: none"> -Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity 	✓	✓	✓	Limited impact very likely	There may be some mitigation required for nearby heritage designations and their settings, though this is an existing industrial area. Visual impact should be limited given the existing surrounding uses and provided any new structures are not out of keeping (in terms of elevation particularly) with those already on the estate and surrounding plots.	+(+)
EN3: To improve the quality of the built environment	<ul style="list-style-type: none"> -Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 	✓	✓	✓	Limited impact very likely	<p>There may be some mitigation required for nearby heritage designations and their settings</p> <p>Estate is in lowest flood risk zone.</p> <p>The priority is for new enclosed facilities that would limit the risk of external impacts when used in conjunction with the existing mitigation applied across the estate.</p> <p>Provided new enclosed facilities are housed in structures similar in scale and design to those already on the estate, there should be no visual degradation of the area, though perceptual issues are commented on in the assessments of Objectives EC1 to EC3.</p>	++
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change 	✓	✓	✓	Very likely	<p>Installation of enclosed facilities will limit new and cumulative dust and emissions impacts.</p> <p>Strategic Objective 3 requires waste to be managed as close as practicable to sources. Centralising facilities inevitably increases 'waste miles' compared to dispersing facilities to each main settlement, but this could mean the sites handle so little local waste that they are not economically viable.</p> <p>It therefore seems sensible to seek to concentrate additional facilities</p>	+

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	adaptation in the minerals and waste sectors					on a well located site where suitability for waste use is already established, recognising that the economic constraints referred to above mean some increase in 'waste miles' is inevitable.	
NR2: To improve water quality and water resources	-Adequate protection for waterbodies and the marine environment and promote the efficient use of water	✓	✓	✓	Quite to very unlikely	New facilities would be enclosed and therefore it is expected that existing mitigation of such impacts would be sufficient (with reconfiguration possibly) as some of them address impacts of open waste management uses.	++
NR3: To restore and protect land and soil	-To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat	✓	✓	✓	Very unlikely	There is potential for the estate to have areas of contamination from previous use. New structures may necessitate piling work and contamination impacts would need to be assessed beforehand and mitigated appropriately. This is a brownfield site with no recent agricultural use.	+(+)
NR4: To manage mineral resources sustainability and minimise waste	-Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate -Support use of co-products from minerals working	✓	✓	✓	Very likely	Any increase of waste facilities on the estate would diversify waste management options, which will contribute to improved resource efficiency and landfill diversion. It is assumed that the priorities will reflect those stated in Strategic Policy SP4 (in turn reflecting the Waste Hierarchy) while at the same time addressing the county's identified waste management needs as stated in Strategic Policy SP3. Any additional facilities could include treatment plant though, ideally, capacity for re-use, recycling or re-processing (re-manufacture) of recyclates should be prioritised if they are feasible.	++
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment	✓	✓	✓	Quite likely	Any increase of waste facilities on the estate would create new jobs, though this is unlikely to be significant as most new waste technologies are largely automated. Further waste development on the site could prejudice occupancy rates and opportunities to attract new investment in the estate. The likelihood of such risks cannot be judged in this assessment, but they would be significantly greater if the site was being proposed as new waste development rather than expansion of what is already there. Waste facilities will be judged	(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature/scale for each impact as necessary	
						inevitably as bad neighbours, but the NPPW acknowledges that they are a form of development that should be capable of sitting alongside other compatible industrial land uses.	
EC2: To improve access to jobs	-Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need	✓	✓	✓	Quite likely	Any incremental growth in jobs appears to support the second criterion. The site is accessible by public transport.	+
EC3: To diversify and strengthen the local Economy	-Stimulate private investment -Stimulate diversification within the waste and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products	?	?	?	Unclear	See comments for Objective EC1.	?
Summary of Assessment							
<p>This site offers several benefits in concentrating expanded existing or new waste management facilities on an existing site, for which the suitability for waste use is already proven. The current and possible future waste uses need to be well located to serve a potentially wide catchment, in order to be economically viable, and it has to be accepted that this will mean some wastes have to travel over some distance for management. This does not necessarily mean that the allocation is in conflict with Strategic Objectives and Policies in the Plan, especially if it delivers capacity that does not exist in the county now, and which means that wastes that are currently being exported (generating considerably more ‘waste miles’) can be managed locally. This outcome is also likely to deliver modest employment growth. The nature of future waste use is not explicit, and any development would require comprehensive assessment of the likely cumulative effects, alongside impacts from existing waste and non-waste uses on the wider estate.</p> <p>The NPPW makes clear that waste facilities are appropriate development alongside other industrial land uses, provided they are mitigated satisfactorily and, in this case, recognising that wastes are already being managed on the site.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative; obvious potential for cumulative impacts from increased road traffic at the site and in the road network in the vicinity (though the road network in the vicinity is good), and other generic impacts (odour, noise, dust, etc.) that accompany most waste management activities.</p> <p>Synergistic: impact will depend on the type of facilities that come forward. Co-location could mean some materials are recycled and treated on the same site, reducing waste miles, emissions and possibly the amount of waste landfilled.</p>							
Mitigation Proposed							

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable /very or quite likely/limited likelihood/no effect/ depends on use	Explain the nature/scale for each impact as necessary	
<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination). 							

BRO5 – Kingmoor Park Rockcliffe Estate – Broad Area

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature/scale for each impact as necessary	
SP1:To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices	✓	✓	✓	Very likely	Expansion of the range of facilities could be beneficial in providing additional options for managing wastes arising in Carlisle District. Outside the city, on a former RAF site, it is well located, though road access is not ideal. There is limited scope for modal shift unless a handling facility is developed at Kingmoor rail sidings; however, the alternative would involve re-locating the existing uses to an alternative site where proximity to waste uses may result in new and greater adverse impacts.	+
SP3:To provide everyone with a decent home	-To help meet local housing need				No impact		0

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature/scale for each impact as necessary	
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people	✓	✓	✓	Quite likely	Several waste uses are already grouped on the site and mitigation measures will be in place to limit or prevent impacts on nearby sensitive receptors. The need for additional measures will depend on the new waste uses; however, the priority appears to be for enclosed facilities that would clearly limit the risks of certain impacts. Given the location, issues of well-being are primarily concerned with other development on the estate and are addressed in comments on Objectives EC1 to EC3.	+(+)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport	✓	✓	✓	Quite likely	The assessment is positive insofar as the provision of additional facilities here could avoid development in other locations, where greater impacts on community assets might arise.	(+)
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and species -Enhancement of natural/ecological resources	✓	✓	✓	Limited likelihood	The estate is close to various biodiversity designations and there are areas nearby known to be used by species affording varying levels of protection. The main issue is whether any additional activities would generate cumulative or new impacts, recognising that they would be limited if new uses are enclosed.	+
EN2: To preserve, enhance and manage landscape quality and character for future generations	-Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity	✓	✓	✓	Limited impact very likely	There may be some mitigation required for nearby heritage designations and their settings, though this is an existing industrial area. Visual impact should be limited given the existing surrounding uses and provided any new structures are not out of keeping (in terms of elevation particularly) with those already on the estate and surrounding plots.	+(+)
EN3: To improve the quality of the built environment	-Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working	✓	✓	✓	Limited impact very likely	There may be some mitigation required for nearby heritage designations and their settings	++

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature/scale for each impact as necessary	
	<ul style="list-style-type: none"> -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 					<p>Estate is in lowest flood risk zone.</p> <p>The priority is for new enclosed facilities that would limit the risk of external impacts when used in conjunction with the existing mitigation applied across the estate.</p> <p>Provided new enclosed facilities are housed in structures similar in scale and design to those already on the estate, there should be no visual degradation of the area, though perceptual issues are commented on in the assessments of Objectives EC1 to EC3.</p>	
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors 	✓	✓	✓	Very likely	<p>Installation of enclosed facilities will limit new and cumulative dust and emissions impacts.</p> <p>Strategic Objective 3 requires waste to be managed as close as practicable to sources. Centralising facilities inevitably increases 'waste miles' compared to dispersing facilities to each main settlement, but this could mean the sites handle so little local waste that they are not economically viable.</p> <p>It therefore seems sensible to seek to concentrate additional facilities on a well located site where suitability for waste use is already established, recognising that the economic constraints referred to above mean some increase in 'waste miles' is inevitable.</p>	+
NR2: To improve water quality and water resources	<ul style="list-style-type: none"> -Adequate protection for waterbodies and the marine environment and promote the efficient use of water 	✓	✓	✓	Quite to very unlikely	<p>New facilities would be enclosed and therefore it is expected that existing mitigation of such impacts would be sufficient (with reconfiguration possibly) as some of them address impacts of open waste management uses.</p>	++
NR3: To restore and protect land and soil	<ul style="list-style-type: none"> -To reduce amount of contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat 	✓	✓	✓	Very unlikely	<p>There is potential for the estate to have areas of contamination from previous use. New structures may necessitate piling work and contamination impacts would need to be assessed beforehand and mitigated appropriately.</p> <p>This is a brownfield site with no recent agricultural use.</p>	+(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature/scale for each impact as necessary	
NR4: To manage mineral resources sustainability and minimise waste	<ul style="list-style-type: none"> -Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate -Support use of co-products from minerals working 	✓	✓	✓	Very likely	Any increase of waste facilities on the estate would diversify waste management options, which will contribute to improved resource efficiency and landfill diversion. It is assumed that the priorities will reflect those stated in Strategic Policy SP4 (in turn reflecting the Waste Hierarchy) while at the same time addressing the county's identified waste management needs as stated in Strategic Policy SP3. Any additional facilities could include treatment plant though, ideally, capacity for re-use, recycling or re-processing (re-manufacture) of recyclates should be prioritised if they are feasible.	++
EC1: To retain existing jobs and create new employment opportunities	<ul style="list-style-type: none"> -Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment 	✓	✓	✓	Quite likely	Any increase of waste facilities on the estate would create new jobs, though this is unlikely to be significant as most new waste technologies are largely automated. Further waste development on the site could prejudice occupancy rates and opportunities to attract new investment in the estate. The likelihood of such risks cannot be judged in this assessment, but they would be significantly greater if the site was being proposed as new waste development rather than expansion of what is already there. Waste facilities will be judged inevitably as bad neighbours, but the NPPW acknowledges that they are a form of development that should be capable of sitting alongside other compatible industrial land uses.	(+)
EC2: To improve access to jobs	<ul style="list-style-type: none"> -Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need 	✓	✓	✓	Quite likely	Any incremental growth in jobs appears to support the second criterion. The site is accessible by public transport.	+
EC3: To diversify and strengthen the local Economy	<ul style="list-style-type: none"> -Stimulate private investment -Stimulate diversification within the waste and minerals sectors -Stimulate innovation and research in waste, minerals recycling and use of co-products 	?	?	?	Unclear	See comments for Objective EC1.	?

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature/scale for each impact as necessary	
Summary of Assessment							
<p>This site offers several benefits in concentrating expanded existing or new waste management facilities on an existing site, for which the suitability for waste use is already proven. The current and possible future waste uses need to be well located to serve a potentially wide catchment, in order to be economically viable, and it has to be accepted that this will mean some wastes have to travel over some distance for management. This does not necessarily mean that the allocation is in conflict with Strategic Objectives and Policies in the Plan, especially if it delivers capacity that does not exist in the county now, and which means that wastes that are currently being exported (generating considerably more 'waste miles') can be managed locally. This outcome is also likely to deliver modest employment growth. The nature of future waste use is not explicit, and any development would require comprehensive assessment of the likely cumulative effects, alongside impacts from existing waste and non-waste uses on the wider estate.</p> <p>The NPPW makes clear that waste facilities are appropriate development alongside other industrial land uses, provided they are mitigated satisfactorily and, in this case, recognising that wastes are already being managed on the site.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative; obvious potential for cumulative impacts from increased road traffic at the site and in the road network in the vicinity, and other generic impacts (odour, noise, dust, etc.) that accompany most waste management activities.</p> <p>Synergistic: impact will depend on the type of facilities that come forward. Co-location could mean some materials are recycled and treated on the same site, reducing waste miles, emissions and possibly the amount of waste landfilled.</p>							
Mitigation Proposed							
<p>The following issues should be addressed at the planning application stage</p> <ul style="list-style-type: none"> Dust, odours, etc.: but should only require standard measures to limit impacts on surrounding land uses. Ecology: Phase 1 habitat survey to assess wildlife use of site and scope for (and value in) retaining trees on the site; will also require protected species, invertebrate and reptile surveys. Contamination: it may be appropriate to require a Stage 1 desk survey of land contamination (i.e. focusing on previous land uses and likely sources and types of contamination). 							

Main Modifications MM73, MM74 and MM75 – clarification of policy approach to site CO32 in Policy SAP3 and supporting text

1. Update required to Table 6.1: Summary of the assessments of the Site Allocation Policies SAP1, SAP2, SAP3

SA OBJECTIVE			SP2: improved access	SP3: housing supply	SP5: health and well-being	SP6: impact on the community	EN1: impact on biodiversity	EN2: impact on landscape	EN3: built environment	NR1: air quality and GHGs	NR2: water resources	NR3: soil resources and geodiversity	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Allocation	District	Function														
AL37 Lillyhall	Allerdale	HWRC	-		+(+)	+	+	++	++	(+)/-	++	+(+)	+			
SL1B Kendal Fell	S.Lakeland	HWRC	+		(+)	++	++	-	+/-	+/-						
AL3 Oldside	Allerdale	Treatment	++		+	(-)	-		(+)	(+)	?	+	++	+	+	?
AL8 Lillyhall	Allerdale	Treatment	+		+(+)	+	+	++	++	(+)	++	+(+)	++	(+)	+	?
AL18 Workington	Allerdale	Treatment	++		+	?	(-)		+	+	?	+	++	++	+	?
CA11 Willowholme	Carlisle	Treatment	+		+	(+)	-	?	-	+/-	-	+	+	+(+)	(+)	?
CA30 Kingmoor Road	Carlisle	Treatment	+		-(-)	(-)	-	-	(-)	?	-	-	+	(+)	+	?
CA31 Kingmoor Park	Carlisle	Treatment	+(+)		++	(+)	+	(+)	+(+)	+	(+)	+(+)	+	+	+	?
CO11 Bridge End	Copeland	Treatment	+		(-)		?	?	+/-	+	(-)	(+)/-	(+)	+	+	
CO32 adjacent Sellafield	Copeland	Inert waste	++		(-)		(-)	(-)	(-)	++	(-)	(-)	++	(+)		
CO32 adjacent Sellafield	Copeland	Radwaste			-(-)		-(-)	(-)	-	+(+)	-	-	+(+)	(+)/?		
CO35 LLWR	Copeland	Radwaste	+(+)		?		-			(+)	-		+	(+)		
CO36 Sellafield	Copeland	Radwaste			?		-		(+)	(+)	-	?	++	(+)		

2. Update required to Table 6.4: Conclusions of the site assessments

CO32 Land adjacent to Sellafield (storage of inert non-radioactive waste): This site could be used to store (potentially long term) non-radioactive, inert construction, demolition and/or excavation waste from decommissioning activity on the Sellafield complex, which would then be available for restoration projects within Sellafield at a later date. This option would be more sustainable than transporting these wastes, by road or rail, to another location, within or outwith the county, for storage or disposal, and then transporting these or similar wastes back to Sellafield when needed.

Storage mounds of the wastes may have implications for temporary or permanent visual impact, though this is not expected to be significant. It is not expected that the facility would entail a built structure and this factor, combined with the nature of the wastes, reduces the likely severity of some of the potential impacts. Best practice mitigation would still be required to prevent contamination of surrounding agricultural land, particularly by wind-blown dust, and to prevent any impact on the ground and surface water environments, using mitigation appropriate to the type of materials stored on the site. Some visual impact on nearby properties and on views from the more distant National Park are inevitable, though they would be limited if the facility/landform has a low elevation. Potential impacts on local nature conservation designations will require further assessment, though restoration could provide some compensatory habitat protection and enhancement. It is not considered that the whole of the allocation would be developed; rather, further assessment would narrow down the most suitable area(s) for each waste use, and mitigation of the identified impacts would still be necessary.

CO32 Land adjacent to Sellafield (treatment/management/storage/disposal of radioactive waste): This site would extend the footprint of the existing Sellafield site, but it would be different in nature, i.e. not a nuclear licensed site. It has the potential to accommodate an engineered voidspace, that would be a successor to the Sellafield on-site landfill facility once it is full, and would be reserved for lower activity LLW generated by de-commissioning and other activity on the adjacent complex; ~~however, an alternative use, for storing clean or contaminated construction and demolition waste, is also under consideration.~~ It is not clear whether any voidspace would be excavated or whether it would be a landraise, and this may have implications for temporary or permanent visual impact, though this is not expected to be significant. Regardless, the facility would not be a built structure and this factor, combined with the nature of the wastes, reduces the likely severity of some of the potential impacts. Best practice mitigation would still be required to prevent contamination of surrounding agricultural land, particularly by dust generated during construction, and to prevent any impact on the ground and surface water environments, using mitigation appropriate to the type of materials stored and/or disposed on the site. Some visual impact on nearby properties and on views from the more distant National Park are inevitable, though they would be limited if the facility/landform has a low elevation. Development would also result in permanent loss of some good quality agricultural land, and impacts on local nature conservation designations will require further assessment, though restoration could provide some compensatory habitat improvement.

It is not considered that the whole of the allocation would be developed; rather, further assessment would narrow down the most suitable area(s) for each waste use, and mitigation of the identified impacts would still be necessary.

The proposal is not as sustainable as allocation CO36, which falls wholly within the existing Sellafield complex, and should only be considered further if rigorous assessment proves that is unrealistic; however, it is more sustainable than a proliferation of such waste disposal sites around the county, especially in terms of transport and its associated emissions.

3. Update required to Table 8.2: Summary of mitigation proposals suggested for Site Allocations arising from SA process

CO32 – Land adjacent to Sellafield (inert, non-radioactive waste)	If the proposal to use the site for low activity LLW comes to fruition, then the inert wastes could be stored in mounds that provided screening; if not, it is more likely that inert wastes would be stored in the three fields closest to the Sellafield complex, in order to provide easier access and less impacts. Measures would be required to prevent movement of water away from the features and materials being carried or blown off the site, especially onto adjacent agricultural land. The likely low elevation of the storage mounds is likely to be sufficient to mitigate the principal visual impacts. Further consideration would also need to be given to the impact on protected species and the scope for habitat compensation if part or all of the site is developed.
CO32 – Land adjacent to Sellafield (radioactive waste)	The nature of the facility is undecided at present, but it is understood that it may require an earth-bunded landform (and subsequent earth-capping during restoration) to include measures to prevent movement of water away from the feature and other materials being carried or blown off the site. Mitigation measures should reflect whether the facility eventually received LLW or non-radioactively contaminated wastes. Specific mitigation measures would be needed during construction to prevent dust and other material being blown onto adjacent agricultural land. The likely low elevation of the facility and containment using bunds is likely to be sufficient to mitigate the principal visual impacts. Further consideration would also need to be given to the impact on protected species and the scope for habitat compensation if part or all of the site is developed.

4. Update required to 2016 SA Report Appendix 5

CO32 – Land adjacent to Sellafield – storage of inert, non-radioactive waste – area estimated as approx. 50ha

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP1: To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices			✓	Quite likely	It is assumed that, where appropriate, access from the Sellafield complex to CO32 would be direct, obviating the need to move radioactive waste originating in the Sellafield complex by road or rail, reducing inherent risk and impacts.	++
SP3: To provide everyone with a decent home	-To help meet local housing need				No impact		0
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people			✓	Quite likely though localised	Main impact would be on a limited number of properties (mainly farms); the closest are in the hamlet of Calder, which is about 200m from the perimeter of Sellafield at its closest point, though development on the very south side of the potential plot would be closer. This is likely to be the most significant impact, as others (including noise and dust) could be addressed by high quality mitigation and/or by locating any facility in the north and western parts of the potential plot.	(-)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport				No impact	(It is assumed any impact on the community and amenity would be subsumed by comments against other Objectives.)	0
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and			✓	Limited likelihood	The wider site is open, good quality agricultural land that has intrinsic biodiversity value and which may be occupied or used by a number of protected species. Natterjack toads	(-)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	species -Enhancement of natural/ecological resources					are likely to be present in the vicinity, though the site does not appear to contain the main habitats that they require. Several county-level biodiversity designations and earth heritage assets are in the vicinity (200m to 1.5km distant) though these distances are measured from the nearest edge of the site and may be greater if a facility is located in the centre of the plot or to one side. Depending on the location of any facility within the wider site, water quality in the River Calder may need to be protected as it is used by salmon migrating to an SAC. There is scope for beneficial restoration.	

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
EN2: To preserve, enhance and manage landscape quality and character for future generations	<ul style="list-style-type: none"> -Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity 			✓	Limited likelihood	The site is likely to be more visible from the edge of the National Park to the east and the NP Authority would need to be consulted on appropriate visual mitigation of any impacts from storage. The area is generally flat and screened to some degree by surrounding woods and hedges. As this is temporary storage, albeit long term, it is not considered that the visual impact would be adverse or significant.	(-)
EN3: To improve the quality of the built environment	<ul style="list-style-type: none"> -Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 			✓	Quite likely but variable	<p>Historic environment: consideration may need to be given to impact on the setting of Listed Buildings; however, the likely nature of the facility suggests that this impact would be limited and much less than the impact of proximity to the main Sellafield complex.</p> <p>Flood risk: the site is in the lowest flood risk zone.</p> <p>Impacts: again, the impacts would be limited by the nature of the facility and would need to be mitigated using best practice measures for movement of wastes to limit impacts of dust, etc.</p> <p>Enhancement: screening of views from the National Park, habitat protection and enhancement could be mitigated by appropriate restoration.</p>	(-)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors 			✓	Quite likely	It is assumed that, where appropriate, access from the Sellafield complex to CO32 would be direct, obviating the need to move radioactive waste originating in the Sellafield complex by road or rail, reducing inherent risk and impacts.	++
NR2: To improve water quality and water resources	<ul style="list-style-type: none"> -Adequate protection for waterbodies and the marine environment and promote the efficient use of water 			✓	Quite likely	Containment to prevent contamination of the soil or groundwater environments will be necessary and should be appropriate to the type of material in the site.	(-)
NR3: To restore and protect land and soil	<ul style="list-style-type: none"> -Reduce contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat 			✓	Limited likelihood	The nature of the facility implies that there would not be irreversible loss of good quality agricultural land. The proposal presents some risks of contamination of surrounding land by material blown or running off the site.	(-)
NR4: To manage mineral resources sustainability and minimise waste	<ul style="list-style-type: none"> -Reflect the waste management hierarchy -Promote the use of renewable forms of energy 			✓	Inevitable	Complies with national policy and strategic policies in the Plan prioritising the management of wastes at source or as close as feasible.	++

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
	-Provide flow of minerals to meet demand within the area -Protect/conserv e mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate rather than primary materials -Support use of co-products from minerals working						
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment			?	Limited impact, short-term only	Job creation would be very limited.	(+)
EC2: To improve access to jobs	-Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need				No impact		o
EC3: To diversify and strengthen the local Economy	-Stimulate private investment -Stimulate diversification within the waste management and minerals sectors -Stimulate innovation and research in recycling and use of co-products				No impact	See comment against Objective EC1.	o

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable/very or quite likely/limited likelihood/no effect/depends on use	Explain the nature/scale for each impact as necessary	
Summary of Assessment							
<p>This site could be used to store (potentially long term) non-radioactive, inert construction, demolition and/or excavation waste from decommissioning activity on the Sellafield complex, which would then be available for restoration projects within Sellafield at a later date. This option would be more sustainable than transporting these wastes, by road or rail, to another location, within or outwith the county, for storage or disposal, and then transporting these or similar wastes back to Sellafield when needed.</p> <p>Storage mounds of the wastes may have implications for temporary or permanent visual impact, though this is not expected to be significant. It is not expected that the facility would entail a built structure and this factor, combined with the nature of the wastes, reduces the likely severity of some of the potential impacts. Best practice mitigation would still be required to prevent contamination of surrounding agricultural land, particularly by wind-blown dust, and to prevent any impact on the ground and surface water environments, using mitigation appropriate to the type of materials stored on the site. Some visual impact on nearby properties and on views from the more distant National Park are inevitable, though they would be limited if the facility/landform has a low elevation. Potential impacts on local nature conservation designations will require further assessment, though restoration could provide some compensatory habitat protection and enhancement. It is not considered that the whole of the allocation would be developed; rather, further assessment would narrow down the most suitable area(s) for each waste use, and mitigation of the identified impacts would still be necessary.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative: any impacts are likely to be cumulative with those from operation of the main Sellafield complex. Road and rail impacts would be limited if it is feasible to move the wastes directly from the adjacent Sellafield complex.</p> <p>Synergistic: the main benefit comes from concentrating these waste activities in close proximity to the source, reducing the possibility of impacts on other parts of the county or further afield.</p>							
Mitigation Proposed							
<p>If the proposal to use the site for low activity LLW comes to fruition, then the inert wastes could be stored in mounds that provided screening; if not, it is more likely that inert wastes would be stored in the three fields closest to the Sellafield complex, in order to provide easier access and less impacts. Measures would be required to prevent movement of water away from the features and materials being carried or blown off the site, especially onto adjacent agricultural land. The likely low elevation of the storage mounds is likely to be sufficient to mitigate the principal visual impacts. Further consideration would also need to be given to the impact on protected species and the scope for habitat compensation if part or all of the site is developed.</p>							

CO32 – Land adjacent to Sellafield - treatment, management, disposal and/or storage of radioactive waste – area estimated as approx. 50ha

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
SP1: To increase the level of participation in democratic processes	-To encourage and empower local people to become involved				No impact		0
SP2: To improve access to services, facilities, the countryside and open spaces	-To improve access to recycling and composting services -Using sustainable transport choices				No impact	(However see comments against Objective NR1.)	0
SP3: To provide everyone with a decent home	-To help meet local housing need				No impact		0
SP4: To improve the level of skills, education and training	-Education and training				No impact		0
SP5: To improve the health and sense of well being of people	-Impact on human health e.g. noise and dust emissions -Proximity to sensitive receptors -Impact on the sense of well being of people			✓	Very likely though localised	Main impact would be on a limited number of properties (mainly farms). The closest are in the hamlet of Calder which is about 200m from the perimeter of Sellafield at its closest point though development on the very south side of the proposed plot would be closer. This is likely to be the most significant impact as others (including noise and dust) could be addressed by high quality mitigation and/or by locating any facility in the north and western parts of the proposed plot. (Note that the scoring reflects the limited number of properties affected but clearly must be assessed as fairly significantly adverse.)	-(-)
SP6: To create vibrant, active, inclusive and open-minded communities with a strong sense of local history	-community identity - social cohesion and help continue valued local traditions -To promote recreational and cultural activity the arts, heritage, dialect and sport				No impact	(It is assumed any impact on the community and amenity would be subsumed by comments against other Objectives.)	0
EN1: To protect and enhance biodiversity	-Impact on relevant habitats and species -Restoration of habitats and			✓	Very likely	The wider site is open, good quality agricultural land that has intrinsic biodiversity value and which may be occupied or used by a number of	-(-)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6- 15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
	species -Enhancement of natural/ecological resources					protected species. Natterjack toads are likely to be present in the vicinity though the site does not appear to contain the main habitats they require. Several county-level biodiversity designations and earth heritage assets are in the vicinity (200m to 1.5km distant) though these distances are measured from the nearest edge of the site and may be greater if a facility is located in the centre of the plot or to one side. The facility is likely to involve an engineered landform that may not be capable of restoration to agricultural use but which could provide scope for habitat creation and/or improvement. Depending on the location of any facility within the wider site, water quality in the River Calder may need to be protected as it is used by salmon migrating to an SAC upstream. The assessment is fairly strongly negative but is mitigated somewhat by the scope for beneficial restoration.	

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
EN2: To preserve, enhance and manage landscape quality and character for future generations	<ul style="list-style-type: none"> -Impact on designated landscape -Impact on areas of heritage value -Impact on the countryside -Recognise and respect importance of remoteness and tranquillity 			√	Limited likelihood	The likely facility is described as 'near ground' but this assessment assumes that capping or restoration might result in a low raised landform. The site is likely to be more visible from the edge of the National Park to the east and the NP Authority would need to be consulted on appropriate visual mitigation of any impacts when the site is being prepared and filled and if restoration would result in a slight increase in elevation above the surrounding area. However the area is generally flat and screened to some degree by surrounding woods and hedges and it is not clear that the long-term visual impact would be adverse or significant.	(-)
EN3: To improve the quality of the built environment	<ul style="list-style-type: none"> -Impact on historic environment and to avoid adverse impacts on the built heritage from mineral working -appropriateness of development relative to flood risk -Reduce noise, light pollution, dust emissions etc. arising from minerals developments and associated land use -Enhance the degraded urban and rural environment within the area 			√	Quite likely but variable	<p>Historic environment: consideration may need to be given to impact on the setting of listed buildings however the likely nature of the facility suggests this impact would be limited and much less than the impact of proximity to the main complex.</p> <p>Flood risk: the site is in the lowest flood risk zone; however see comments for the assessment of Objective NR2.</p> <p>Impacts: again, the impacts would be limited by the nature of the facility and would need to be mitigated using best practice measures for engineered landforms to limit impacts of dust, etc., particularly during clearance and construction.</p> <p>Enhancement: any degradation of the rural environment around the Sellafield complex would occur during preparing and filling of the site but could be mitigated by appropriate restoration.</p>	-

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
NR1: To improve local air quality and reduce greenhouse gas emissions	<ul style="list-style-type: none"> -Control dust emissions -Sustainable transport of waste and minerals where feasible to help reduce emissions -Stimulate the development and application of clean/carbon efficient technologies -Energy from waste facilities and contribute to the use of renewable energy sources -promote climate change adaptation in the minerals and waste sectors 			√	Very likely, possibly inevitable	As with allocation CO36, development obviates the need to move radioactive waste originating in the Sellafield complex by road or rail, reducing inherent risk and impacts.	+(+)
NR2: To improve water quality and water resources	<ul style="list-style-type: none"> -Adequate protection for waterbodies and the marine environment and promote the efficient use of water 			√	Quite likely	<p>The exact nature of the facility is not known and may involve shallow below-ground storage and/or disposal and/or an engineered landraise which will cap the facility once it has been filled. However the site may be restored to the existing ground level.</p> <p>An alternative use for the site may be as a temporary or long-term store for non-radioactive construction and demolition waste created by works around the Sellafield complex.</p> <p>Containment to prevent contamination of the soil or groundwater environments will be necessary and should be appropriate to the type of material in the site.</p>	-
NR3: To restore and protect land and soil	<ul style="list-style-type: none"> -Reduce contaminated land in the area -Loss of high grade agricultural land and Greenfield sites -Potential to cause soil degradation, pollution - the use of peat 			√	Inevitable	The nature of the facility implies that there would be irreversible loss of good quality agricultural land. The proposal presents some risks of contamination of surrounding land by material blown or running off the site though this is most likely to be excavated inert material and the main risk is more likely to occur during construction or if it is used for temporary storage of other waste as referred to above.	-
NR4: To manage mineral resources sustainability and minimise waste	<ul style="list-style-type: none"> -Reflect the waste management hierarchy -Promote the use of renewable forms of energy -Provide flow of minerals to 			√	Inevitable	Complies with national policy and strategic policies in the Plan prioritising the management of wastes at source or as close as feasible.	+(+)

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
	meet demand within the area -Protect / conserve mineral resource from sterilisation as far as possible -Encourage use of secondary aggregate rather than primary materials -Support use of co-products from minerals working						
EC1: To retain existing jobs and create new employment opportunities	-Retain existing jobs and stimulate new ones in the waste and minerals sectors -Support local business development or investment			?	Limited impact, short-term only	Job creation is only likely during construction of the facility with limited ongoing need once any site is operational. Previous consultation indicated concerns that development would hinder investment in the local area though it is difficult to see what additional adverse impact would occur as a result of developing this facility provided it is very close to the existing complex.	(+)/?
EC2: To improve access to jobs	-Increase access for all to a range of jobs -Encourage the location of employment opportunities in areas of greatest need				No impact		o
EC3: To diversify and strengthen the local Economy	-Stimulate private investment -Stimulate diversification within the waste management and minerals sectors -Stimulate innovation and research in recycling and use of co-products			?	No impact	See comments against Objective EC1.	o
Summary of Assessment							
<p>This site would extend the footprint of the existing Sellafield site, but it would be different in nature, i.e. not a nuclear licensed site. It is has the potential to accommodate an engineered voidspace, that would be a successor to the Sellafield on-site landfill facility once it is full, and would be reserved for lower activity LLW generated by de-commissioning and other activity on the adjacent complex; however, an alternative use, for storing clean or contaminated construction and demolition waste, is also under consideration. It is not clear whether any voidspace would be excavated or whether it would be a landraise, and this may have implications for temporary or permanent visual impact, though this is not expected to be significant. Regardless, the facility would not be a built structure and this factor, combined with the nature of the wastes, reduces the likely severity of some of the potential impacts. Best practice mitigation would still be required to prevent contamination of surrounding agricultural land, particularly by</p>							

Assessment framework		Permanence			Characteristics of impacts		
SA Objective	Evaluation criteria	Duration			Certainty	Nature/scale of impact(s)	Score
		0-5 yrs	6-15 yrs	>15 yrs	Inevitable / very or quite likely / limited likelihood / no effect / depends on use	Explain the nature / scale for each impact as necessary	
<p>dust generated during construction, and to prevent any impact on the ground and surface water environments, using mitigation appropriate to the type of materials stored and/or disposed on the site. Some visual impact on nearby properties and on views from the more distant National Park are inevitable, though they would be limited if the facility/landform has a low elevation. Development would also result in permanent loss of some good quality agricultural land, and impacts on local nature conservation designations will require further assessment, though restoration could provide some compensatory habitat improvement.</p> <p>It is not considered that the whole of the allocation would be developed; rather, further assessment would narrow down the most suitable area(s) for each waste use, and mitigation of the identified impacts would still be necessary.</p> <p>The proposal is not as sustainable as allocation CO36, which falls wholly within the existing Sellafield complex, and should only be considered further if rigorous assessment proves that is unrealistic; however, it is more sustainable than a proliferation of such waste disposal sites around the county, especially in terms of transport and its associated emissions.</p>							
Secondary, Cumulative & Synergistic Impacts							
<p>Secondary: none identified.</p> <p>Cumulative: any impacts are likely to be cumulative with those from operation of the main Sellafield complex. Road impacts would be limited to the construction phase only, unless the rail link was used, as wastes would be moved within the expanded Sellafield site without access to public roads.</p> <p>Synergistic: the main benefit comes from concentrating civil nuclear activities in close proximity reducing the possibility of impacts on other parts of the county or further afield (the latter being a concern of the Plan in terms of its broader sustainability even if it has a lower local priority).</p>							
Mitigation Proposed							
<p>The nature of the facility is unclear but it is understood it may require an earth-bunded landform (and subsequent earth-capping during restoration) to include measures to prevent movement of water away from the feature and other materials being carried or blown off the site. Mitigation measures should reflect whether the facility eventually received LLW or non-radioactive wastes generated on-site. Specific mitigation measures would be needed during construction to prevent dust and other material being blown onto adjacent agricultural land. The likely low elevation of the facility and containment using bunds is likely to be sufficient to mitigate the principal visual impacts. Further consideration would also need to be given to the impact on protected species and the scope for habitat compensation if part or all of the site is developed.</p>							