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1.0 Introduction

- 1.1 This document is a non-technical summary of an **Addendum** to an Environmental Statement that was submitted to Cumbria County Council in December 2009 to accompany a planning application by ENDECOM UK LTD for the development of a waste management facility for low and very low level radioactive waste at the former Keekle Head Open Cast mine, near Pica, Cumbria.
- 1.2 The Addendum document provides further information about various aspects of the proposed scheme in response to a formal request from Cumbria County Council (CCC) in June 2010. This Non-Technical Summary provides a summary of the Addendum content, expressed in non-technical language.
- 1.3 Copies of the Addendum including the supplementary Planning Statement are available at a cost of £150 from Endecom UK Ltd. Alternatively, an electronic version can be provided on a CD-Rom disk at a cost of £15. A copy of the Addendum Non-Technical Summary is available free of charge from Endecom UK Ltd and is also available on SITA's website www.sita.co.uk by entering 'KeekleHead' in the search engine.

2.0 Need & Waste Hierarchy

- 2.1 Cumbria County Council requested further information on where the low level and very low level radioactive wastes (LLW & VLLW) that need to be disposed of in the future will come from and what quantities there will be. They considered the information provided in Appendix 3.1 of the Environmental Statement to be 'rather dated and subjective'.
- 2.2 The need section of the Addendum document reviews the various sources of information about where the waste will come from and what quantities there will be, concluding that whilst information from different sources varies, everybody agrees that there is a need for a disposal facility to divert lower activity wastes from the Low Level Waste Repository near Drigg (LLWR).
- 2.3 The producers and managers of LLW & VLLW are required by government policy to manage their waste as sustainably as possible in accordance with

a recognised hierarchy. The hierarchy begins with reduction of waste, moving on to re-use, recycling and then energy recovery with disposal to landfill being the least desirable option. Keekle Head Waste Management Centre would provide the final landfill disposal route for those wastes identified as unsuitable for other methods of waste management.

3.0 Alternatives

- 3.1 This section of the Addendum document addresses a request from CCC to provide an assessment of other sites that could perform the same role as Keekle Head Waste Management Centre on or near to the main source of wastes at Sellafield. Whilst it is not practical or appropriate for Endecom to undertake assessment of nuclear licensed sites such as Sellafield where access is restricted, Endecom have held a series of meetings with the Nuclear Decommissioning Authority (NDA), Sellafield Ltd and LLWR Ltd in a bid to understand their plans and strategies for VLLW management. It is evident from these discussions and from evidence presented during the Cumbria Minerals and Waste Development Framework Site Allocation hearings that no short or medium term solutions are likely to be possible on site at Sellafield or at the LLWR.

4.0 Road Condition Survey

- 4.1 A road condition survey of the C4012 access route to the proposed facility was commissioned in response to a request from CCC highways officers and is included in the Addendum document. The survey found that the C4012 road surface quality between Distington and the site varied from poor to very poor and would benefit from resurfacing.
- 4.3 Endecom accepts that a contribution to long term maintenance of this road would be a reasonable expectation of CCC if the proposed development goes ahead.

5.0 Landscape and Visual Impact

- 5.1 CCC requested various elements of additional information to be submitted in relation to the landscape and visual assessment. Where considered appropriate these additional elements are provided in the Addendum document to ensure the assessment of impacts is both transparent and comprehensive.
- 5.2 The additional information provided does not change the outcome of the landscape and visual impact assessment as submitted in the Environmental Statement and it is still considered that impacts identified would be localised and would not be unacceptable.

6.0 Hydrology and Hydrogeology

- 6.1 During the consultation process on the planning application the Environment Agency raised a number of queries. These were significantly reduced in number when Cumbria County Council confirmed that the baseline for Environmental Impact Assessment of the proposals was the restored opencast and that operations related to the dewatering, backfilling and restoration of the existing opencast site (including the realignment of the River Keekle) were already consented and were not to be considered in the assessment of the impacts of the proposed scheme.
- 6.2 There have been a number of recent changes to the regulatory regime administered by the Environment Agency. These changes and discussions with the Environment Agency have resulted in some changes to the below ground design of the proposed facility, whereby the base of the proposed site will now remain above the predicted groundwater level. The modifications do not change the final landform or the fundamental design of the site.
- 6.3 An updated Outline Environmental Safety Case (OESC) is also provided in the Addendum document as a result of discussion with the Environment Agency. The OESC looks at the principles of site design and confirms acceptability of the proposed waste types and quantities to be disposed of.

- 6.4 The Environment Agency raised concerns over the limited environmental controls that exist for the already consented opencast restoration phase of the development. Endecom agrees with this in the Addendum document and confirms that they are prepared to accept planning conditions that will require submission of a detailed landscape restoration scheme and method statements for approval prior to the development commencing.
- 6.5 The Environment Agency also requested further information on private water supplies. The Addendum document confirms that neither the water levels nor the water quality would be affected by the proposed development.

7.0 Ecology

- 7.1 Cumbria County Council requested further information in relation to a range of ecological aspects. Perhaps the most prominent amongst the issues raised was in relation to Hen Harrier, a species protected under Schedule 1 of the Wildlife & Countryside Act. The Addendum includes further information about the issues raised including a Hen Harrier Impact Assessment

8.0 Community Benefits

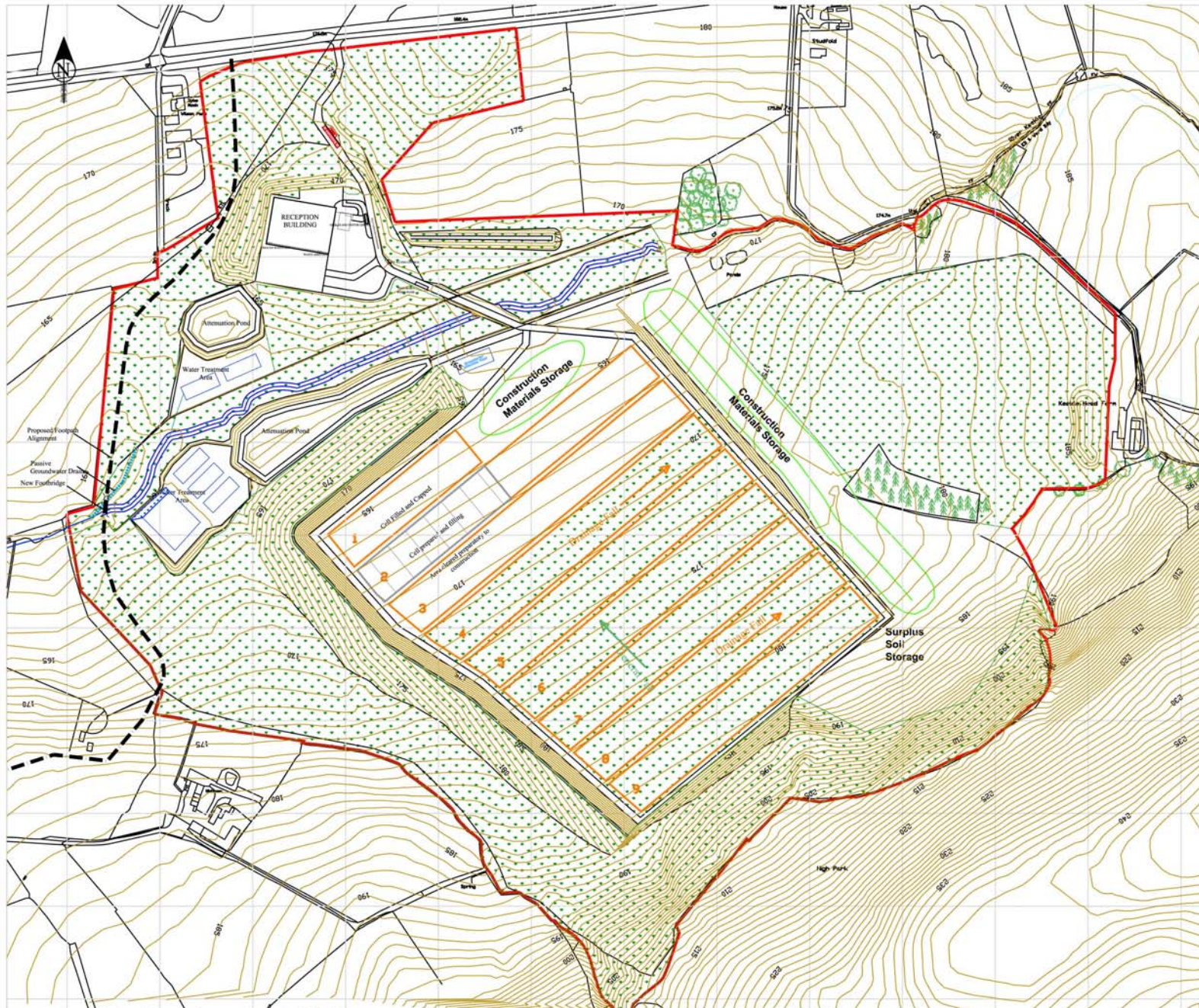
- 8.1 Endecom has clarified in the Addendum document that they would be happy to agree to funding of schemes that would be of benefit to the local community, such as resurfacing of the back lanes in Pica village.
- 8.2 Endecom would also expect to provide local road and signage improvements and a contribution towards long term road maintenance through a section106 legal agreement. Provision for off-site hen harrier roosting habitat could also be addressed through a section 106 agreement, if the council decides that they are not happy to address this with a planning condition (as was done for the nearby Fairfield windfarm development).

9.0 Financial Guarantees

- 9.0 The Environment Agency (EA) require the operator of any regulated facility such as that proposed at Keekle Head to be financially capable of complying with the Environmental Permit. Notwithstanding this, Endecom would be willing to provide financial guarantees to the planning authority should this be considered sufficient.

10.0 General Comments

- 10.1 A number of other minor queries regarding the proposed scheme and assessment of it are answered within the Addendum document and specific correspondence and reports are provided within appendices to it.
- 10.2 The landscape restoration plan for the site has been the subject of some discussion with consultees and the intention would be that the full detail of the restoration scheme would be subject to a suitably worded planning condition such that the scheme would be developed in collaboration with the relevant stakeholders. The restoration plan included in the application is meant as an outline on which to build a more considered scheme to optimise wildlife habitats and to take into account views of those with adjacent landholdings.
- 10.3 A number of the submitted drawings are also amended or supplemented to reflect minor changes to the proposed scheme, including the 'Proposed General Arrangement' drawing as included within the original non-technical summary document. A copy of the revised version of the 'Proposed General Arrangement' drawing is therefore included in this non-technical summary of the Addendum document.



- Key**
- Original and Restoration Contours
 - Site Boundary
 - Existing Woodland
 - Restored or Temporarily Restored Areas
 - Weatherproof Enclosure
 - River Keele Diversion
 - Landfill Phase Outline

REVISIONS – Passive Groundwater Drain added, surrounding contours adjusted, footpath and bridge added.

This view of the site is at the commencement of filling in Phase 2.

Based on a survey supplied by SITA January 2009



Endecom UK Ltd

KEEKLE HEAD WASTE MANAGEMENT CENTRE

Addendum Figure NTS 2A
Replaces Figure NTS 2

Proposed General Arrangement

Scale 1:4,000@A3	Date January 2011
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