

**CUMBRIA MINERALS AND WASTE DEVELOPMENT FRAMEWORK
SITE ALLOCATIONS AND PROPOSALS MAP
EXAMINATION HEARING SESSION 3: AREA OF SEARCH FOR MINERALS**

**RESPONSE TO THE INSPECTOR'S ISSUES AND QUESTIONS
HOLKER ESTATES
(REPRESENTATION REFERENCE 27)**

The methodology adopted for the Sustainability Appraisal satisfies Government requirements and was considered acceptable at the previous Site Allocations Examination. The letter from Barrow Borough Council dated 5 December 2011 indicated that they disagreed with the results of the assessment of Site M12 against criteria EN2, 'to preserve, enhance and manage landscape quality for future generations', and criteria NR4, 'to manage mineral resources sustainably and to minimise waste' but had no objection to sand extraction from Site M27.

The results of the assessment against criteria EN2 is similar for Sites M12 and M27 with both outside the area formerly designated as a County Landscape and of the same 'Low Drumlin' landscape type. The character of the coastal strip has clearly been affected by the development of the gas terminals and power station but much of the M27 site remains in agricultural use. This also applies to the M12 site but overhead power lines and gas pipelines cross the area with proposals for wind generation having the potential to further erode its rural character. Any planning permission for sand extraction here will of course be for a temporary period and be subject to a phased scheme of working and landscape restoration.

The M12 Area of Search now excludes the high ground to the north that reaches a height of 43 metres AOD and also the 34 metre hill to the south. It also avoids the public right of way that crosses the site with the best position for a vehicular access being at the existing field gate mid-way along the Rampside Road frontage.

The assessment results against criteria NR4 are also similar for both sites but the objection from the Borough Council seems to suggest that developing a new quarry within the M12 Area of Search is less sustainable than extending the existing sand quarry southwards. This disregards the

fact that the recent planning permission to extend the working life of the quarry to 2016 requires its restoration to agriculture and as a wildlife habitat. Any southwards extension into the M27 site will therefore have similar sustainability impacts as developing a new quarry on the M12 site with the former also involving the loss of a site of identified archaeological interest.

The Morecambe Bay Ramsar, SPA, SAC are a kilometre to the west of the M12 site and sand extraction here will have insignificant impacts on these European wildlife sites with no justification for a Habitats Regulations Assessment. Stank Moss, a few hundred metres to the northeast, is a County Wildlife Site but a properly designed scheme of sand extraction within the M12 Area of Search will have very little impact on this.

Core Strategy Policy 7 states that 'supply and production areas, strategic locations and preferred sites for further supplies of sand and gravel...will be identified in the Site Allocations' with paragraphs 10.2 and 10.21 confirming that these will address 'maintaining appropriate local landbanks related to local patterns of supply'. The existing Roose Quarry has reserves of sand and gravel of less than five years but is subject to a twelve month licence that would also apply to any southward extension into the M27 site. The landbank for sand and gravel in the south of the County is therefore insufficient for the period covered by the CMWDF and without a new site being identified the Site Allocations would be inconsistent with the Core Strategy and therefore unsound.

The M12 Area of Search is the only other site that has been identified for sand and gravel extraction in the south of the County. The geological map for the area confirms that glacial sand and gravel covers all of the M12 site with an IGS borehole recording some 15 metres of sand in the western corner. A borehole investigation of the rest of the site carried out at the end of last year has confirmed that there is sufficient sand and gravel here to maintain a rate of production similar to that at Roose Quarry for up to 30 years.