

Document reference: ED101

Cumbria Mineral and Waste Development Framework: Repeated Site Allocations Policies and Proposals Map

Barrow Borough Council Statement

Issue 4: Areas of Search for Minerals, Minerals Safeguarding Areas and Mineral Consultation Areas

The Sustainability Appraisal (SA) for Site M12 identifies no adverse environmental/sustainability impacts under its assessment against criteria EN2 (To preserve, enhance and manage landscape quality and character for future generations) and NR4 (To manage mineral resources sustainably and to minimise waste). The Borough Council does not agree with these conclusions and question the methodology used in the SA.

Appendix 3 of the SA, sets out the 'rules' used for the assessment and this includes 12 appraisal criteria (although the SA notes that the criteria listed are those used for waste sites and not all of these are included in the mineral sites matrix).

Criterion 10 (Visual and Landscape Impact) does appear in the appraisal of Site M12. However, as criterion 12 only refers to the impact upon "nationally designated landscape areas (Heritage Coasts, Areas of Outstanding Natural Beauty and National Parks)", no assessment is made of the impact upon the prominent open countryside setting, which is described as being a 'Low Drumlin' landscape in the Cumbria Landscape Character Guidance and Toolkit, March 2011 (LD196).

Cumbria Landscape Character Guidance and Toolkit notes, on page 91, that Low Drumlin landscape can only be found in two small areas of Cumbria (from Barrow to south Rampside and between Milnthorpe and Farleton Knott) and that the vision for these two small areas, which is stated on page 92 of the document, is that "This is a well composed landscape which will be conserved and enhanced".

The Borough Council are concerned that the SA methodology does not adequately assess 'visual and landscape impact'.

The Sustainability Appraisal, dated October 2011, which accompanied the repeated Regulation 27 Site Allocations DPD, stated that Site M12 was "within a Minerals Safeguarding Area". The Borough Council are pleased that this has been amended and the Sustainability Report that accompanied the repeated Regulation 30 Site Allocation DPD, dated January 2012, now refers to "a proposed Minerals Safeguarding Area".

Site M12 is not included for assessment in The Habitat Regulation Assessment (HRA) as either an Area of Search or as part of a Minerals Safeguarding Area. This HRA states in paragraph 1.8 "The Assessment does not include land that the Council is proposing should be identified as Areas of Search for extending quarries or as Minerals Safeguarding Areas (MSA). This is because Areas of Search are fairly broad areas where knowledge about mineral resources is less certain than a Preferred Area".

The Borough Council question this approach. Site M12 is a clearly defined allocation within the Site Allocations DPD, therefore it should be subject to Habitats Regulation Assessment.

The Borough Council appreciate that, if Site M12 is not included as an Area of Search within the proposed Site Allocations DPD, this is likely to present an issue of soundness. However, it is not the Council's wish that Site M12 is simply excluded, rather that it is effectively assessed in order to determine its appropriateness for inclusion in the DPD.