



Draft Cumbria Minerals and Waste Local Plan 2014-2029

Sustainability Appraisal Report Non-Technical Summary

(incorporating requirements of the EU Strategic Environmental Assessment Directive)

Regulation 18 Consultation

March 2015



Date	Details	Prepared by	Reviewed and approved by
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Introduction

The County's evolving Minerals and Waste Local Plan (MWLP) has been subject to Sustainability Appraisal (SA), incorporating the requirements of the Strategic Environmental Assessment Directive. The full results of the Sustainability Appraisal of the Regulation 18 MWLP are published in the MWLP Sustainability Appraisal Report. This non technical summary provides an overview of the approach to the Sustainability Appraisal and a summary of the main findings.

Sustainability Appraisal is a statutory requirement for Development Plan Documents as set out in the Planning and Compulsory Purchase Act 2004. It is a systematic process used to assess the extent to which a plan or strategy will help to achieve relevant social, environmental and economic objectives, that reflect issues affecting the area where the plan will have an effect. If the plan or strategy also includes site allocations these proposals are assessed using the same procedure and the SA also proposes ways of avoiding or reducing negative impacts of development.

SA has been an integral part of developing minerals and waste policy for Cumbria and has been carried out at the various stages since 2006. This work began with the SA undertaken during the preparation of earlier Core Strategy and Generic Development Control Policies DPD's (adopted 2009) and the Site Allocations DPD (withdrawn 2012). A further SA report was prepared to accompany the draft MWLP in 2013.

The results of the SA have directly influenced the Plan. It has assisted in choosing options for policies, has recommended changes to and additions to policy wording and set out mitigation and enhancement measures at each stage to improve the policy framework.

Requirement to Undertake a Sustainability Appraisal

Sustainable development is the core principle underpinning the planning system. In order to ensure that new plans and strategies contribute towards sustainable development, the Planning and Compulsory Purchase Act 2004 introduced the requirement for SA to be carried out on all new or revised Local Plans (formerly known as Local Development Frameworks). While the Localism Act 2011 and the publication of the National Planning Policy Framework (NPPF) have resulted in a number of significant changes to the planning system, there is a continued requirement for Local Plan documents to be subject to SA throughout their preparation.

In addition, local planning authorities must comply with European Union Directive 2001/42/EC, which requires a formal Strategic Environmental Assessment (SEA) of plans and programmes that are likely to have a significant effect on the environment.

SA and SEA are distinct processes but many of their requirements overlap. This report has been produced to meet the requirements of both. Throughout the SA

report, all references to SA should be taken to include the requirements of European Directive 2001/42/EC.

Sustainability Objectives

The SA considers the potential implications of the MWLP by assessing the policies it contains against a series of social, environmental and economic objectives. Accordingly, the establishment of these objectives is central to the SA process.

Drawing upon the sustainability issues identified through analysis of baseline data and the review of other relevant plans and strategies, 16 objectives have been identified that reflect those social, environmental and economic issues that are prevalent within Cumbria and which it is intended will be addressed through the MWLP.

An initial Scoping Report was prepared in 2006 containing a review of policies and strategies at international, national and local level, and defining a current baseline of economic, environmental and social conditions in the county. The County Council's Sustainability Team and the Cumbria Sustainability Group identified key issues and problems for Cumbria and developed an appraisal framework to be used as the basis for all SAs undertaken within the county irrespective of the type of plan involved. The Sustainability Objectives in this framework were agreed through a robust and systematic process following extensive consultation when the Scoping Report was produced.

No changes have been made to the appraisal framework and the County Council is satisfied that it remains relevant and robust for ongoing use. However, the original Scoping Report has been updated recently to bring detail of the baseline conditions up to date and to reflect new policies and strategies relevant to planning, minerals and waste that have been published or become material considerations over the intervening period.

Baseline Characteristics and Key Sustainability Issues

The review of plans, programmes and strategies, the analysis of the baseline data, and consultation with the public and statutory bodies identified the key sustainability issues shown below:

Social	Update and Implications for the MWLP
<ul style="list-style-type: none"> • Pressure for housing pushing prices up – implications for housing to meet local needs and affordability of housing (S. Lakeland, Eden & LDNP); • Second homes/holiday lets and inward migration by retired people adds to this pressure (S.Lakeland, Eden & LDNP); • Run-down and vacant properties not utilised fully (Barrow & West Coast); 	<p>The dispersed nature of the population and settlements within Cumbria, and the topography of the County, provides a continuing challenge in providing services to rural communities.</p>

<ul style="list-style-type: none"> • Access to services and facilities problematic in rural communities; • Public transport network inadequate in rural areas; • Comparatively safe communities overall but fear of crime disproportionately high in isolated rural areas; • Some alcohol-fuelled anti social behaviour linked to the night-time economy (Carlisle and Barrow) and a comparatively high number of race related incidents; • 'Tourist' shops, for example in LDNP, may reduce the number of shops and services providing for local needs; • Established out of town shopping affecting the viability of smaller town centres; • Traffic congestion at peak times (Carlisle, Kendal) and also seasonal congestion (LDNP); • Lack of cycle networks within towns and cities; • Loss of young people, particularly graduates and a reluctance of young people to continue family farming traditions; • network of 'appropriate and necessary waste management facilities' as well as provide 'innovative solutions or alternative sites' for small communities. 	<p>The Plan must ensure that waste management sites are appropriately sited to facilitate community access where appropriate. This is most relevant to provision of Household Waste Recycling Centres.</p> <p>This issue cross references to economic, environmental and resource issues. Provision of convenient waste recycling services to households can minimise per capita carbon emissions by increasing recycling and minimising disposal of biodegradable waste to landfill.</p>
<p>Economic</p> <ul style="list-style-type: none"> • Unemployment with higher levels of economic inactivity in West Cumbria and Furness partly linked to large number of incapacity benefit claimants; • Low unemployment and skills shortage in Eden and South Lakes; • Economic vulnerability due to decline of manufacturing & uncertain future of nuclear industry (West Coast & Barrow); • Increasingly frequent relocation of jobs outside the county (and the country); • Low wage economy particularly tourism related jobs; • Below average share of growth sectors in local economy; • Limited research and development facilities; • Gross Value Added growing more slowly than the rest of the UK causing the economy to underperform and a widening of regional disparities of wealth; • Recent farming crises causing problems for agriculture coupled with unique problems of farming in upland areas (falling incomes and the labour intensive nature of the work); 	<p>Unemployment in Cumbria as a whole is less than the national rate, but Gross Value Added per head of population remains low.</p> <p>Some areas within Cumbria continue to experience economic and social problems, and the Local Plan needs to ensure that minerals and waste sectors make a contribution to the local economy of Cumbria and provide direct and indirect employment to local people.</p> <p>Economic growth and infrastructure proposals in West Cumbria will need to be supported by addressing resource issues below.</p>

<ul style="list-style-type: none"> • Poor access to West Cumbria and Barrow; • Redundant port and harbour areas in need of rejuvenation; • Pressure from mobile phone and internet companies/users to improve telecommunications in Cumbria; • Lots of derelict/contaminated (brown field) land in some areas due to decline in industry economy and secure jobs. 	<p>Ongoing use of ports and harbours for minerals and waste transport should be encouraged.</p> <p>The use of brownfield land should be encouraged.</p>
Environmental	
<ul style="list-style-type: none"> • Loss of tranquillity and impact of lights on dark skies; • Vulnerability of the landscape to recreational leisure and sporting activities; • High proportion of species identified for national conservation priority; • Large tracts of upland and coastal habitat remain but elsewhere there are declines in extent (fragmentation) and quality of wildlife habitats and populations for some species; • High proportion of nutrient rich lakes supporting a wide range of aquatic plants, invertebrates and breeding and wintering wildfowl; • Vulnerability of nutrient rich lakes and nutrient poor lakes (and their resident species) to additional enrichment from farming fertiliser run off and sewage; • Significant pressure on rivers, lakes and tarns from diffuse sources of pollution (agricultural wastes, fertilizers and run off from drains and road surfaces, coupled with some air pollution); • Unknown impact of climate change possibly leading to outward migration of some species and inward migration of others as average temperatures rise; • Unsympathetic alterations to old buildings and bland new developments altering historic character and damaging archaeology in some areas; • National renewable energy targets likely to lead to pressures for more development of wind farms which could affect landscape character and quality; • Air quality problems in urban areas; • Need to reduce the risk to people and property from flooding (Carlisle, Kendal and Keswick). 	<p>The Local Plan must ensure that adequate protection is afforded to the high quality environment present within Cumbria.</p> <p>New waste management facilities must be carefully located and both waste management and mineral extraction facilities must be managed to both protect and enhance the County's environmental assets.</p> <p>The impacts of climate change for Cumbria include increased precipitation rates and risk of flooding. Minerals and waste developments can offer opportunities for improved flood storage, as well as increased risk of flooding elsewhere.</p> <p>There are opportunities to minimise or reduce greenhouse gas emissions through minerals and waste developments. This includes energy generation and protection of sequestered carbon in peat.</p>
Resources	
<ul style="list-style-type: none"> • Pressure responding to regulations preventing biodegradable waste going to 	<p>The reduction in disposal of municipal waste to landfill</p>

<p>landfill;</p> <ul style="list-style-type: none"> • The need to develop alternative waste management methods and secure the necessary level of investment in additional facilities; • Problems of disposal and storage of radioactive wastes; • Pressure to continue to supply scarce mineral resources to meet national demand (gypsum and skid resistant roadstone); • The need to meet mineral demand by substituting secondary and recycled material for primary aggregates. 	<p>has shifted emphasis to enabling provision of treatment capacity for moving commercial and industrial waste up the waste hierarchy.</p> <p>Continuing adequate supplies of construction minerals will be required if constraints on growth, regeneration and development are to be avoided.</p>
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Appraisal Results: Positive and Negative Effects

The SA process concluded that the MWLP has the potential to deliver a wide range of social and environmental benefits. The MWLP also has the potential to deliver some economic benefits in providing scope for new minerals developments and the deployment of new waste management facilities to provide sufficient capacity to meet most local needs. In both cases new development has some scope to also deliver social benefits through job creation, particularly if this occurs close to areas of deprivation in suburban and rural areas. However, these opportunities are limited as minerals development is likely to result in successive, rather than simultaneous, development of new sites while new waste management technologies are not particularly labour-intensive.

The tables below provide an overview of the assessment showing the nature (i.e. positive, negative, neutral or no impact) and scale of the likely effect of the policies and sites in the MWLP. The most significant positive and negative impacts are shown as ‘++’ and ‘- -’ respectively. All positive impacts are shown in green; negative in red; those where there are both positive and negative impacts in yellow; and the lack of an impact in white¹. In some cases it is not certain that there will be any impact but parentheses are used and the possibility is noted (e.g. (+) means possible minor beneficial impact), while in other cases ‘?’ is used to note that an impact is anticipated but it is not clear whether the overall effect will be beneficial or adverse.

The assessments are divided into the four main policy sets of: Strategic Framework (Vision and Strategic Objectives), Strategic Policies, Development Control policies and Site Allocation policies. **The appraisals of the MWLP demonstrate that there are no major sustainability concerns at this stage in the plan making process and that there are no significant reasons to not proceed with the MWLP as prepared.** Assessments of all three sets of policies are clearly positive though the level of detail means that only a limited number of SA Objectives are addressed in each case. The very few negative impacts from the strategic policies reflect the need

¹ Objective SP1 is included in the first table but not in subsequent ones as the assessment concluded that none of the policies or sites had an impact on this objective

to support national policy or to make continuing provision for landfill of waste as a precaution, even if this is not a strategic objective of the MWLP.

The SA report identifies specific mitigation measures that are considered to improve the way strategic and development management policies address the sustainability issues identified in the appraisal framework. The Council will review these measures and incorporate them into revised policies prior to future publication of the draft MWLP.

It is also important to recognise that the site assessments summarised in tables on the following pages do not take account of the impact of mitigation because there is no certainty about what measures will be used. This situation is reflected in a greater number of identified adverse impacts, which are the inevitable result of these facilities, especially those operating in the open. However, the SA identifies mitigation to address issues specific to each site. These measures will not be reflected in later revision of the MWLP, but will instead be implemented through the Development Control and Environment Agency permitting processes once a planning application for a particular site is submitted.

Therefore, the policy framework as a whole includes measures to mitigate and/or control effects and provides a robust framework for assessing the impacts of planning applications.

Summary Assessment of Spatial Vision, Overall Strategy and Strategic Objectives

SA OBJECTIVE	SP1: Democratic Processes	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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Spatial Vision	+	++	++		(+)					(+)			++	(+)		
Overall Strategy		++	+(+)		+		++	++	++	++	++	(++)	++	+(+)		+
Strategic Objectives	?	++	(+)		++	?	++	++	++	++	++	?	++	++		(+)

Summary of performance 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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Policy	Summary title															
SP1	Presumption in favour				++	++	++	++	++	++	++	++	++	++	++	++
SP2	Provision for waste	+								+			+	(+)		(+)
SP3	Waste capacity									+			++	+		+
SP4	Use of Best Available Technique				+		+	+	+	++	+	+	++			
SP5	Development criteria for LLW									(-)			+			
SP6	HLW & ILW Criteria				?			?		+/-			+			
SP7	Minerals provision and safeguarding									+			++	+		+
SP8	Strategic areas for minerals												+	+		+
SP9	Marine dredged aggregates				(+)		(+)	(+)			+		++			
SP10	Industrial limestones						?	?	?			?	+			
SP11	Peat						+	+		++		++	++			
SP12	Climate change				+		+	(+)	(+)	+	+		+			+
SP13	Economic benefit			+								(+)		++		+
SP14	Environmental assets				(+)	(+)	++	++	+	+	+	+				
SP15	Restoration and afteruse				+	+	++	++	+	+	+	+	+	(+)		(+)
SP16	Section 106 planning obligations	+			+	+	+	+	+	+	+	+				
SP17	Monitoring and enforcement				+		+	+	+		+	+				

Summary of performance of the Development Control 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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Policy	Summary title															
DC1	Traffic and Transport	++			(+)			(+)	(+)	++					+	
DC2	General Criteria				++		++	++	++	+	++					
DC3	Noise				++		(+)	(+)	+							
DC4	Quarry Blasting				+				(+)							
DC5	Dust				++		+	+	++	++						
DC6	Cumulative Environmental Impacts				+		+	+	+	+	+	+				
DC7	Energy from Waste									++			++			
DC8	Renewable Energy Use on Minerals and Waste Sites									++			++			
DC9	Criteria for Waste Management Facilities				+			+	+			+	+			
DC10	Criteria for Landfill and Landraise				(+)/-		(+)/-	(+)	(+)	+			+			
DC11	Inert Waste for Agricultural Improvement										++	++	+			
DC12	Criteria for Non-Energy Minerals Development				?		?	?	?			?	+	(+)		(+)
DC13	Criteria for Energy Minerals				?		?	?	?	-	?	?	+	(+)		(+)
DC14	Review of Mineral Permissions				+		+	+	+	+	+	+				
DC15	Minerals Safeguarding				?				+				++			
DC16	Biodiversity and Geodiversity				+		++	+			+	+				
DC17	Historic Environment				+		(+)	+	++							
DC18	Landscape and Visual Impact				+	+	+	++	++							
DC19	Flood Risk				+		+		+			+				
DC20	The Water Environment				(+)		+			+	++	+				
DC21	Protection of Soil Resources						+			+	+	++				
DC22	Restoration and Afteruse	+			+	+	++	++	+	+	+	+	+	+		+

Summary of Assessment of Sites Proposed for Household Waste Recycling Centres, Waste Treatment Facilities and the Treatment, Management, Storage and Disposal of Low Level Radioactive Wastes Identified in Policies SAP1, SAP2 and SAP3

			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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Proposed allocation	District	Function														
AL37 - Lillyhall	Allerdale	HWRC	-		+(+)	+	+	++	++	(+)/-	++	+(+)	+	-	-	
SL1B - Kendal Fell Quarry	S. Lakeland	HWRC	+		(+)	++	++	-	+ / (-)	+ / (-)						
AL3 - Oldside	Allerdale	Treatment	++		+	(-)	-		(+)	(+)	?	+	++	+	+	?
AL8 - Lillyhall	Allerdale	Treatment	+		+(+)	+	+	++	++	(+)	++	+(+)	++	(+)	+	?
AL18 - Port of Workington	Allerdale	Treatment	++		+	?	(-)		+	+	?	+	++	++	+	?
CA11 - Willowholme	Carlisle	Treatment	+		+	(+)	-	?	-	+/-	-	+	+	+(+)	(+)	?
CA30 - Kingmoor Road	Carlisle	Treatment	+		-(-)	(-)	-	-	(-)	?	-	-	+	(+)	+	?
CA31 - Kingmoor Park East	Carlisle	Treatment	+(+)		+(+)	(+)	+	(+)	+(+)	+	(+)	+(+)	+	+	+	?
CO11 - Bridge End	Copeland	Treatment	+		(-)		?	?	+/-	+	-	(+)/-	(+)	+	+	
ED31 - Flusco	Eden	Treatment	+		(-)	(+)		(-)	?	(+)		(+)	(+)	(+)	?	(+)
CO32 - Land adj. Sellafield	Copeland	LLW storage/disposal		-(-)			-(-)	(-)	-	+(+)	-	-	+(+)	(+)/?		
CO35 - LLWR, near Drigg	Copeland	LLW storage/disposal	+(+)		?		-			(+)	-		+	(+)		
CO36 - Land in Sellafield	Copeland	LLW storage/disposal			?		-		(+)	(+)	-	?	++	(+)		

Summary of Assessment of Minerals Sites Identified in Policies SAP4 and SAP5

				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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Preferred areas	District	Material	Status														
M12 - Roosecote	Barrow	Sand & gravel	New Site		+	-		(-)	-	(-)	-	-	(-)	(+)			
M18 - Stamphill	Eden	Gypsum	New site	++	+	-(-)		-	-	(+)/-	(+)	-	-	+	+	+	
Areas of search	District	Material	Status														
M5 - High Greenscoe	Barrow	Mudstone	Extension		++	-	?	?	?	(-)		?		+	+		
M6 - Overby/High House	Allerdale	Sand & gravel	Extension		(+)	(+)		+/-	(+)	+/-		-	?	(+)			
M8 - Cardewmires	Carlisle	Sand & gravel	Extension		(+)	?		?	?	+/-		-	+/-	+			
M10 - Silvertop	Carlisle	Limestone	Extension		++			(-)	(-)	(-)		?		+	+		
M14 - Kirkby	S Lakeland	Slate	Extension		+	(-)	(+)	+/-	?	?		-		+(+)	+	?	
M15 - Peel Place	Copeland	Sand & gravel	Extension		++	-(-)		-	-	+/-	+/-	(-)	?	+			
M16 - Holmescales	S. Lakeland	Roadstone	Extension	(-)		-(-)	?	-		-(-)	-			+	+		
M17 - Ghyll Scaur	Copeland	Roadstone	Extension	++		-(-)	(-)	-	?	+/-	+/-			++	+	(+)	
M30 - Roan Edge	S. Lakeland	Roadstone	Extension			-			?			?	(+)	+	+		
Mineral safeguarding	District	Material	Status														
M24 - Derwent Howe	Allerdale	Secondary agg	Continuation			-	-	+/-	+/-	+	?	(-)	+/-	++	(+)		?

Summary of Assessment of Existing and Potential Railheads and Wharves Proposed for Safeguarding in Policy SAP6

			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	NR4: resource efficiency	EC1: employment levels	EC2: access to employment	EC3: the local economy
Safeguarded railheads/wharves	District	Status														
AL18 - Workington port	Allerdale	Operational	++		+ / (-)					+(+)				(+)		
AL32 - Siddick	Allerdale	New	++		(+) / -	?	(-)		(+) / -	+(+)		(-)				
AL38 - Innovia, Wigton	Allerdale	Operational	(+)							+			(+)			
AL39 - Silloth port	Allerdale	Operational	+							+			+	+		+
BA26 - Barrow port	Barrow	Operational	++						(+) / ?	++				(+)		
CO35 - LLWR rail spur	Copeland	Operational	++							++						
CO36 - Sellafield rail spur	Copeland	Operational	++							++						
M31 - Salthouse	Copeland	Temporary	++		--		?	-	- / (-)	++	?	?	+	(+)		
M34 - Kingmoor	Carlisle	Operational	++		+ / ?					+				?		
M35 - Shap Beck quarry	Eden	Operational	++				?			++			+	(+)		
M36 - Shapfell quarry	Eden	Operational	++				?			++			+	+		
M37 - Shap Blue quarry	Eden	Operational	++				?			++			+	(+)		
M38 - Kirkby Thore works	Eden	Operational	++							++			+	(+)		

Strategic Alternatives

A key part of the plan making process is the consideration of strategic alternative options to the proposed policy approach or sites being taken forward. In relation to the MWLP, the consideration of strategic alternatives has been an iterative process and the results of the ongoing preparation of new minerals and waste policy for Cumbria since 2006. The plan making process has continued forward through several changes in legislation and policy at the national level and some stages of preparation have been delayed or repeated as a result. The consideration of alternative options has varied depending on the particular issue to be managed and considered. This situation reflects the iterative nature of plan-making; and that policies have different considerations that must be taken into account. The story is not linear and reference has had to be made to earlier SA reports prepared for the adopted Core Strategy and Generic Development Control Policies DPD's and the 2013 draft MWLP.

Difficulties Encountered

Two difficulties were encountered that reflect the type of Plan being assessed:

- Many strategic policies have no spatial expression and require a judgement about whether an effect will occur at all and how significant or extensive it will be. The situation appears to make this part of the SA less comprehensive than that dealing with sites where potential impacts should be easier to identify.
- Practical Guidance on SA and SEA advises that where the impact is uncertain consideration should be given to whether the plan or policy can be amended so that the effect is more definite. In this assessment it has proved difficult to judge the scale or extent of the impact in some cases, and it has been necessary to qualify assessments using the '()' and '?' symbols referred to previously.

Monitoring

Initial proposals for appropriate indicators capable of monitoring the significant effects of the MWLP have been provided, but will be subject to further review prior to publication of the Draft Plan. It is recommended that the monitoring of the significant effects is incorporated into the overall monitoring framework of the MWLP.

Next Steps

The Council is inviting representations on this SA/SEA Report in parallel with consultation on the Regulation 18 draft MWLP.

The period in which you can make representations on this report will be the same as that for commenting on the MWLP and will be advised separately.

If you wish to respond on the SA/SEA Report please address your comments to the following locations:

By mail: Planning Services, County Offices, Kendal LA9 4RQ

By email: mwlp@cumbria.gov.uk

In either case please mark correspondence 'MWLP SA consultation' unless you are including the response with a representation on the Local Plan document.