

**MINERALS AND WASTE DEVELOPMENT FRAMEWORK
SUSTAINABILITY APPRAISAL:**

SCOPING REPORT

July 2006

Executive Summary

This Scoping Report represents the first stage of a sustainability appraisal of the Cumbria Minerals and Waste Development Framework. It sets the scene and outlines how the following stages of the sustainability process will be carried out.

The Cumbria MWDF will contain development plan policies which determine planning applications for minerals extraction and waste management facilities across Cumbria. Local Development Frameworks are a feature of the recently revised national planning regime as is the sustainability appraisal of development plan documents. Sustainability appraisal of development plans has been introduced to ensure that development plans contribute to the delivery of sustainable development in line with government policy and also to ensure that development plans meet the requirements of the Strategic Environmental Assessment Directive.

Sustainability appraisal is part of the plan-making process. It is an iterative process which assesses the degree to which each stage of the plan being developed is likely to deliver sustainable outcomes and makes recommendations to improve delivery of sustainable development. These recommendations are fed into and shape subsequent versions of the developing plan.

The Scoping Report assesses the likely contribution of the draft plan objectives to sustainable development. Where appropriate, recommendations have been made to encourage more sustainable production and consumption.

The introduction of sustainability appraisal signifies a move to a more evidence based plan-making process which in turn helps facilitate monitoring of the impact of plan policies.

This Scoping Report was originally published as a draft consultation document in December 2005 and invited comments from interested parties and the public on how the appraisal should be carried out. Comments received have been recorded in this final version of the Scoping Report along with the appraisal team's responses.

Alex. McKenzie
Sustainability Manager
Cumbria County Council

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1.0 Introduction – Purpose of this document

- 1.1 This Scoping Report explains the sustainability appraisal process for the Cumbria Minerals and Waste Development Framework (MWDF). An earlier consultation draft Scoping Report was sent to statutory consultees and a range of other organisations, including minerals and waste companies, environmental organisations and other stakeholders that had been identified as having an interest in the process. The earlier draft was also made available for public comment via the Council's website.
- 1.2 The Scoping Report is the first stage of a prescribed process of carrying out a full sustainability appraisal of the MWDF. The aim of the sustainability appraisal is to integrate socio-economic and environmental concerns into the plan-making process so that the MWDF contributes to a more sustainable society, one in which social and economic progress takes place in harmony with the environment.
- 1.3 The earlier consultation process provided an opportunity for stakeholders and the public to consider, comment and influence the way that the appraisal is carried out.
- 1.4 The Sustainability Appraisal also needs to conform to the guidelines issued by the Office of the Deputy Prime Minister¹ and meet the requirements of the Strategic Environmental Assessment Regulations (2004). Appendix 1 to this report demonstrates how the requirements of the SEA Directive are being met by the range of sustainability objectives which make up the existing sustainability appraisal framework developed by Cumbria County Council's Sustainability Team for general sustainability appraisal work.
- 1.5 This Scoping Report is the first step in the sustainability appraisal process. It involves identifying other policy influences on the MWDF whether these arise from international agreements, European legislation or domestic national policy. This search for policy influences also takes account of regional and local plans and strategies which combine to help shape the MWDF. Having identified these influences it is necessary to work out the implications for the MWDF and the sustainability appraisal process.
- 1.6 This provides policy direction for the MWDF and helps identify a range of sustainability objectives around which the sustainability appraisal framework can be constructed. It also gives some clues about the range of baseline information needed to monitor progress of the plan and helps identify suitable sustainability indicators.
- 1.7 Other key steps in the Scoping Report involve: identifying the main sustainability issues relevant to Cumbria and using this to developing a sustainability framework which forms the basis for the appraisal; testing the Cumbria Minerals and Waste Development Plan's objectives against the sustainability framework and consulting on the scope of the sustainability appraisal.

2.0 Present Situation

- 2.1 Cumbria County Council is the Minerals and Waste Planning Authority for those areas of Cumbria which lie outside the boundaries of the Lake District National Park and the Yorkshire Dales National Park in Cumbria.
- 2.2 The current Cumbria Minerals and Waste Local Plan was adopted by the County Council in June 2000. It sets out detailed policies for guiding and controlling development relating to the supply of minerals and the management and disposal of waste. The Plan is currently being reviewed and will be replaced by a new Minerals and Waste Local Development Framework around September 2007. The existing plan's policies will continue to operate until then.

3.0 The Effect of Recent Changes to the Planning system

- 3.1 The Planning and Compulsory Purchase Act 2004 introduced a new system for the preparation of development plans. As a consequence the County Council is now required to prepare Local Development Documents (LDDs) which will collectively form the Minerals and Waste Development Framework. The LDDs will replace the current Minerals and Waste Local Plan and deliver the minerals and waste spatial planning strategy for Cumbria outside the National Parks from 2007 until 2018.
- 3.2 The Minerals and Waste Development Framework can be thought of as a folder containing a number of development documents. Within the framework (or folder) will be:
 - Development Plan Documents (DPDs) – these include spatial planning documents with separate core strategies setting out spatial visions for minerals and waste in Cumbria along with strategic objectives and policies. Other development documents which make up the MWDF include site allocations and proposals maps, annual monitoring reports and a statement of community involvement. At the start of the plan-making process a minerals and waste development scheme is drawn up and becomes part of the MWDF. In essence this explains the plan review process and sets out a timetable.
 - Supplementary Planning Documents (SPDs) – these can be issued after the development plan has been published if experience shows that more detailed guidance for developers is needed on specific policies contained in the DPD.

4.0 Background to the Appraisal Process

- 4.1 Government guidance¹ issued in November 2005 means that both DPDs and any subsequent SPDs require an assessment of their socio-economic and environmental impacts (the sustainability appraisal).
- 4.2 Plans which require a sustainability appraisal are:
 - Regional Spatial Strategies and revisions
 - Local Development Documents (including Minerals and Waste LDDs) and revised DPDs
 - Supplementary Planning Documents (SPDs)
- 4.3 The sustainability appraisal must meet the requirements of the Strategic Environmental Assessment Directive (2001/42/EC) which was given legislative effect in the UK through the Environmental Assessment of Plans and Programmes 2004 (the SEA Regs.).
- 4.4 Without going into detail, the SEA Directive requires environmental considerations to be integrated into the plan-making process so that the environment enjoys a high level of protection and plans and programmes contribute to sustainable development. It introduces a broad consultation process as part of the environmental assessment. The final version of the plan must show how any environmental considerations identified as part of the assessment process have been dealt with and set out a monitoring programme to measure the effect of the plan's implementation on the environment. The monitoring process is included to trigger remedial action on unforeseen outcomes.
- 4.5 The Directive applies to a range of plans that includes land-use and spatial plans.
- 4.6 The Directive is quite specific and clearly sets out how the environmental assessment should be carried out. Plans which fail to meet the requirements of the SEA Regs. may be challenged by third parties and their implementation delayed pending the outcome of an inquiry into the validity of the complaint.
- 4.7 The requirements to carry out a sustainability appraisal and an environmental assessment are distinct. However Government guidance on sustainability appraisal has been issued to enable sustainability appraisals to be carried out which meet the requirements of the SEA Regs. Responsibility for ensuring that the sustainability appraisal meets the requirements of the SEA Regs. rests with the appraiser.

5.0 Exploring Sustainability Appraisal

- 5.1 Sustainable development has been defined elsewhere³. Here the term is used to describe a society in which social and economic progress are pursued in a way that does not damage the environment (both local and global) and positive action is taken to reduce and restore previous environmental damage caused by human activity. Underpinning this is a concern that future generations should inherit a healthier planet with sufficient resources available to support the world's populations.
- 5.2 Sustainability appraisal builds on earlier techniques of environmental appraisal which were developed to assess and mitigate the likely effects of a decision or a policy proposal on the environment. The important thing is to make the appraisal process part of the policy process so that the findings of the appraisal can shape the final version of the policy.
- 5.3 Sustainability appraisal broadens the appraisal process by adding social and economic assessments to the environmental assessment of a draft plan or developing programme. Again the aim is to use the assessment results to shape the final version of the plan or programme.
- 5.4 Appraisal involves identifying, quantifying, weighing up, and reporting on the pros and cons of each option. Since policies generally describe the state of things which will exist when the policy is put into effect, the appraisal process needs to contain a thorough analysis of the measures to be used to implement the policy.
- 5.5 A systematic appraisal ensures that the options are clearly laid out and assessed. This gives an assurance to the public that the policy and the way it is to be applied have been thoroughly thought out and leaves a clear record showing how the policy was formulated to be used by those responsible for monitoring and reviewing the policy at later date.
- 5.6 Sustainability appraisal needs to be part of the plan-making process. It aims to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. There is no point in carrying out an appraisal after the plan has been finalized since the opportunity to shape the plan has been lost.
- 5.7 The Government takes the view that sustainability appraisals will help local planning authorities contribute to national policy objective⁴ of achieving sustainable development.
- 5.7 Appendix 2 to this report reproduces a diagram which illustrates how the sustainability process fits with the plan-making process.

6.0 The Sustainability Appraisal Process

6.1 The Sustainability Appraisal process can be broken down into five stages:

A: Setting the context and objectives, establishing the baseline and deciding on the scope.

B: Developing and refining options and assessing effects. This stage involves testing the DPD objectives against the SA framework that was developed in Stage A. It also requires predictive analysis and evaluation of the likely effects of the DPD, mitigation measures for any adverse effects predicted, proposals to maximise positive effects and proposals for monitoring the significant likely effects of the DPD.

C: Preparing the sustainability appraisal report.

D: Consultation on the preferred options of the DPD and the SA report. This stage involves the final SA report that was developed in Stage C. Any significant changes that need to be made as a result of consultations will be assessed before the Development Plan Documents and the Sustainability Appraisal are submitted to the Secretary of State.

E: Monitoring the significant effects of implementation of the DPD. This involves finalising the monitoring programme and responding to any significant adverse effects of the DPDs at an early stage.

6.2 Stage A of the sustainability appraisal process involves 'setting the context and objectives, establishing the baseline and deciding on the scope'¹ In detail, this involves:

- Identifying other relevant plans and policies programmes and sustainability objectives;
- Collecting baseline information;
- Identifying sustainability issues and problems;
- Developing the sustainability appraisal framework; and
- Consulting on the scope of the sustainability appraisal.

6.3 This Scoping Report covers Stage A of the sustainability appraisal process outlined above. It has been revised following consultation with stakeholders and to respond to stakeholder comments on the scope of the sustainability appraisal and the level of environmental detail required.

7.0 Identifying other relevant plans and programmes and sustainability objectives

- 7.1 When preparing a local development document it is necessary to identify other plans and policies which relate in some way to the development plan document being prepared and to establish any policy influences being directed at the development document in question. In this way the plan-maker can ensure the plan being prepared reflects policy direction emanating from Government, from the EU, from the wider international community or indeed from sources nearer home. A thorough review of relevant plans, policies and programmes can simplify the plan-makers task by ensuring policy harmony at the outset and help avoid potential conflicts with other programmes.
- 7.2 Equally the plan-maker would wish to ensure that the plan contributed to sustainable development and therefore it is necessary to establish sustainability issues or objectives that can be taken into account in the preparation of the plan.
- 7.3 The SEA Directive (Annex 1) is quite clear on the need to identify relevant plans and environmental protection objectives and ensure that these are fully considered during the plan-making process.
- 7.4 Appendix 3 to the Scoping Report sets out the list of documents reviewed by the County Council's Sustainability Team as part of this process of identifying other relevant plans, policies and programmes.
- 7.5 International conventions and protocols were not ignored but not reviewed directly. This was done to save time and avoid repetition. In the majority of cases the EU and indeed the UK government are signatories to most international agreements on environmental action and this is invariably reflected in European legislation or communications and in many cases UK government strategy.
- 7.6 The review of relevant plans is expanded at Appendix 4 to provide a brief summary of the plan or programme or relevant piece of legislation. This makes clear the link with the MWDF and identifies any external policy direction with which the MWDF needs to respond. Following on from this, Appendix 3 also identifies policy issues for both the MWDF and helps identify appropriate objectives around which to build the sustainability appraisal framework.
- 7.7 Other influences on the objectives to be included in the sustainability framework include the Profile of Key Issues and Pressures Affecting Cumbria. This profile (shown at Appendix 5) gives some measure of social, economic and environmental concerns in Cumbria and helped identify sustainability objectives for inclusion in the sustainability framework.

8.0 Collecting Baseline Information

- 8.1 Collecting and analysing baseline information on selected policy areas is an essential part of the plan-making process. The feedback provided allows an evaluation to be made of the extent to which the plan is achieving its stated aims and objectives. This allows problems to be identified and policies to be reviewed to overcome any difficulties found in implementation.
- 8.2 The trick is to keep the monitoring process manageable and relevant and avoid at all costs any tendency to suck in data simply because it exists and is easy to get hold of. Conversely it is vitally important not to overlook data requirements simply because the data set does not currently exist or it is difficult, for whatever reason, to get hold of the data.
- 8.3 Identifying baseline data requirements means exploring existing minerals and waste monitoring regimes⁴ and looking to the sustainability objectives for clues on what might be a relevant indicator.
- 8.4 Care needs to be taken when selecting indicators. As well as being relevant, indicators need to be clearly defined and measure what they are supposed to be measuring. An element of common sense needs to be deployed so that data sets are of acceptable quality and the data can be readily acquired over a period of time either free of charge or at reasonable cost.
- 8.5 The use of indicators should enable a range of targets to be set in a particular policy area and the feedback provided by the monitoring process should be capable of provoking changes in policy when necessary. Indicators should also be clear and easy to understand.
- 8.6 The SEA Directive focuses on specific topic areas which the sustainability framework incorporates and these topic areas considerably broaden the scope of the monitoring process and therefore can be expected to increase the number of indicators required.
- 8.7 This means that monitoring of relevant indicators will need to embrace aspects of each topic area listed in the SEA Directive:
 - Population
 - Biodiversity
 - Human health
 - Soil
 - Water
 - Air
 - Climatic factors
 - Material assets
 - Cultural change
 - Landscape.

- 8.8 In Cumbria there is a need to carry out a number of sustainability appraisals of policy framework documents. Each of these appraisals will have to meet the requirements of the SEA Regs. 2004. While there will be some common ground in terms of baseline data, different types of plan will have varying impacts on the environment. Once the range of plans that need appraisals is taken into account, the need for a comprehensive socio-economic and environmental database becomes compelling.
- 8.9 The SEA Regs require appraisals to include an assessment of the current state of the environment and a prediction of the likely future state of the environment if the plan is not implemented. Additional information, much of it to be gleaned from the state of the environment review, is also required on the environmental characteristics of areas likely to be affected and any existing environmental problems which can be linked to the plan, particularly issues affecting designated sites.
- 8.10 Another aspect of the SEA Directive is the relationship between these topic areas and the emerging sustainability appraisal framework. Some interpretation work will be required to make sense of 'population' and 'material assets' and the results blended into the sustainability framework along with human health.
- 8.11 In Cumbria the County Council's Waste Management Team hold detailed statistical records relating to waste. This includes information on kerbside collection, civic amenity sites, composting, recycling, clinical waste, total household waste, total municipal waste and total commercial waste. Other data on waste is available from the Regional Technical Advisory Body and supplemented by information gleaned from planning applications and the Environment Agency's licensing processes.
- 8.12 Minerals data is reported in the Annual Monitoring Report⁵ which includes the quantities of crushed rock and sand and gravel sold each calendar year. This is accompanied by data on 'landbanks' granted planning permission for extraction.
- 8.13 No reliable data exists on the production of secondary and recycled aggregates. Aggregate minerals data is provided for all of Cumbria by the Regional Aggregates Working Party. A national Radioactive Waste Inventory is updated periodically. This provides information on sources, quantities and types of radioactive waste in storage. Nuclear waste is a major policy issue in Cumbria since there are a number of nuclear facilities and the county hosts what is in effect a national waste facility for low level wastes.
- 8.14 It is recognised within the authority that more needs to be done to improve statistical reporting on minerals and waste to allow effective plan monitoring.
- 8.15 In Cumbria discussions have taken place with the 4 statutory consultees to identify existing data sets that can be used to create a Cumbria socio-economic and environmental database.
- 8.16 Key socio-economic data is already held by the County Council and is available to inform evidence-based policy development. This covers:
- Population and population projections
 - Indices of deprivation
 - Long-term limiting illness
 - Qualifications

- General health
- Incapacity benefit and various related benefit data
- Household survey data
- Employers survey data
- Socio-economic analysis of wards
- Average income data of households
- Unemployment benefit claimant data
- Business survey data.

8.17 English Nature have also identified a range of data sources on biodiversity and suggested possible indicators on biodiversity, air quality, soil quality, water, landscape character and climate change.

8.18 Likewise the Countryside Agency has provided information on its data sets. These include maps of protected landscapes and designated areas and state of the countryside data which spans social, economic and environmental issues. This provides evidence based on 20 key themes covering:

- People and communities
- Services and lifestyle
- Environment and recreation
- Economy and enterprise

8.19 The Countryside Agency has also developed measures for monitoring change in countryside character. Thus character area profiles exist which sets out the key elements that gives an area its sense of local distinctiveness along with the threats and opportunities facing those areas.

8.20 The Environment Agency has identified indicators and data sources on the extent and quality of the priority species and habitats for which it is responsible. Environment Agency data sets include: CO₂ and other emissions to air from industry regulated by the Agency; number of properties in flood zones; flood defence maps; hazardous waste arisings and movements; maps of landfill sites; water abstraction data; river quality; bathing water quality; groundwater vulnerability; location of IPPC sites and landfill sites; fly-tipping incidence and fish stocks.

8.21 A set of sustainability indicators has been included with this Scoping Report at Appendix 6. They are structured around the 16 sustainability objectives and aligned with the topic areas in the SEA Directive. More work needs to be done to refine these indicators and develop the evidence base. This will be tackled in subsequent stages of the appraisal process.

9.0 Baseline Information

- 9.1 At this stage the bulk of baseline data has yet to be assembled. Work has begun on this. This will require re-evaluation of existing data sets in some cases to disaggregate Cumbrian data down to the area of the development plan. Work will continue on data sourcing over the next stage of the sustainability appraisal report so that a bespoke set of indicators is included in the next report which will go out for public consultation. Developing an indicator set will involve further discussions with the statutory consultees and other organisations.

The County

- 9.2 Cumbria is the second largest county in England. Its boundaries enclose 6,810 sq. kms. This represents 48% of the land area of the North West region. The Minerals and Waste plan area does not cover all of Cumbria. It excludes the Lake District National Park area and that part of the Yorkshire Dales National Park which overlaps with part of South Lakeland (see Map 1).
- 9.3 The total plan area is 4,106 sq kms. The resident population of the plan area is 444,054 (mid year 2004 estimate) living in 185,791 households.

Deprivation

- 9.4 The Index of Multiple Deprivation (2004) measures deprivation in small areas of about 500 households across a series of factors and combines these into a single weighted deprivation index. The areas measured are income deprivation (22.5% weighting), employment deprivation (22.5% w), health deprivation and disability (13.5% w), education skills and training (13.5% w) barriers to housing and services (9.3% w), living environment deprivation (9.3% w) and crime (9.3% w).
- 9.5 Looking at the 354 district council areas in England, Barrow stands out as the 29th most deprived district. Copeland is the 84th most deprived while Allerdale and Carlisle rank 105 and 108 respectively. Eden and South Lakeland districts more comfortably sit at the other end of the deprivation spectrum with average scores of 200 and 258 respectively.
- 9.6 The type of deprivation can be identified within districts so for example deprivation in Allerdale relates to employment, health and disability and barriers to services. In Barrow there are significant issues of deprivation relating to employment, health and disability and living environment. In Eden and South Lakeland deprivation relates solely to barriers to services. This is a significant issue in Eden.

Health and Lifestyles

- 9.7 In 2003, the 3 Primary Care Trusts that cover Carlisle, Eden and west Cumbria carried out a health and lifestyle survey (71.2% response rate) of 25,504 people registered with a GP in North Cumbria. Again while not an exact match this area broadly equates to the plan area. Survey results show that: 8% report their health as bad or very bad; 54% of people are overweight or obese; 40% consume less than 5 pieces of fruit or vegetables a day; 10% have a sedentary lifestyle; 27% of men and 17% of women drink in excess of recommended alcohol levels; 16% of men and 9% of women over 65 reported suffering a heart attack; 17% of the population reported shortness of breath with wheezing; around 18% may have mental health problems; and in rural area difficulty is experienced with access to services (A & E, GPs, and food stores selling fresh fruit and vegetables).

Housing

- 9.8 In Cumbria 34.9% of people own their homes outright while a further 36.9% are buying their homes with a mortgage or loan. 27.8% of people rent their homes either from local councils, registered social landlord or private landlords. An estimated 0.36% Of the population is thought to be homeless while 4.3% are living in homes which fail to meet the decent homes standard.
- 9.11 There are a number of housing issues in Cumbria. Affordable housing is a particular problem in parts of Cumbria. Research has shown that South Lakes and Eden have a worse affordability gap than anywhere else in the North of England. They also have the second (South Lakes £179,000) and forth highest (Eden £169,500) median house prices in North West England.
- 9.12 Second homes ownership is thought to contribute to affordability. There are 7,374 second homes of which 4,136 are in and around the Lake District National Park while the rest are located in the Eden Valley and the Solway Coast AONB, both of which are in the plan area.

Employment and Earnings

- 9.13 In the Plan area 117,303 people are employed full-time with a further 43,433 employed part time and 27,402 people self employed. In Cumbria 4.4% of the population claims incapacity benefit.
- 9.14 Unemployment in Cumbria during May 2006 is running at 2%. In the Plan area male unemployment is 3.2% and female unemployment is 1.1%. In total 5,587 people (2.2%) were registered as unemployed in the Plan area during May 2006.
- 9.15 Average earnings in the plan area exist at ward level and range from £17,507 to £39,308. In recent years gross weekly earnings for men and women in full time employment have been lower in Cumbria when compared to both the North West Region and the UK. However in 2005 gross weekly pay for male full time workers in Cumbria exceeded the North West average by 3.0% and all full-time

workers in Cumbria earned 97.3% of the national average gross weekly wage. Males in Cumbria also earned £128.30 per week more than full-time women.

Education and Skills

- 9.16 Analysing educational attainment within the population is difficult because of the range of qualifications and the data collection systems used. In addition levels of work based competence (vocational skills and knowledge) are equated to academic qualifications. Government data on this should therefore be regarded as illustrative. In Cumbria an estimated 32% of the population aged 16 – 74 is without qualifications of any kind while a further 38% has 5 GCSEs or equivalent vocational qualifications (levels 1 and 2). A further 6.5% of the population is educated to A level standard or vocational equivalent (level 3) while an estimated 16% is educated to degree level or vocational equivalent (levels 4 and 5). The qualification level of the remaining 7.5% of the population is unclear.

Employment by Sector

- 9.17 In the plan area the retail sector is the largest employer with 37,643 employees. Manufacturing is the second largest employer with 35,043 employees while 'real estate' employs 19,135 (note: this sector includes property, rental of property, cars and machinery, computers, legal and accountancy, advertising and a number of sundry activities). Health and social work is the third largest employer with 24,567 employees.
- 9.18 Altogether the plan area has 188,583 employees (2006 data). Construction employs 9,485; transport employs 9,347; hotels employ 13,742; public administration and defence employ 8,651 while schools and higher education employs 14,890. Some smaller sectors have not been listed nor do the figures shown take account of the self-employed.

The Local Economy

- 9.19 Overall the state of the economy is not buoyant. Although separate data does not exist for the plan area, it is known that Cumbria contributes about 6% of the economic output of the North West region (cf. Lancashire generates around 20%, Merseyside 16% and Cheshire 18% respectively, while Greater Manchester contributes some 40%).
- 9.20 Cumbria's economic performance (gross value added per capita) has declined from 92% in 1995 to 77% in 2001. This makes it the worst performing economic sub region in the UK. In part this reflects some refinement of the statistics but in real terms is due to contraction in manufacturing and agriculture.
- 9.21 Another factor which contributes to the lack of growth in the Cumbrian economy is the comparatively large numbers of small companies: 83% employ less than 10 people. This is associated with competitive weakness arising from a combination of factors: limited capital and management skills; limited growth ambitions; restricted markets; low investment in training and limited promotion opportunities for staff.

The Environment

- 9.22 Cumbria's environment is diverse. Its unique topography has been shaped by the passage of time and climatic conditions acting on the rlying rock structures. These processes, including melting glaciers, have influenced soil, vegetation and wildlife distribution. Human activity has also been affected by topography. This can be seen in the pattern of settlements and road and rail links which in the main skirt the central High Fells of the Lake District.
- 9.23 Penrith weather data (169 metres above sea level) averaged for the period 1971 to 2000, gives a maximum daytime temperature of 12.1⁰C, around 58 days of air frost each year, with 1243 hours of sunshine each year, and 149 days of rainfall providing 929 mm of rain.
- 9.24 There is a need for a biodiversity evidence base to inform policy in Cumbria and partner organisations are keen to secure funding and establish a Cumbrian biodiversity local records centre. Current knowledge and the existing evidence base is not adequate for forming policy and assessing impacts at the strategic level. However work is proceeding on developing a standard biodiversity evidence base which will help meet the needs of the SEA Directive.
- 9.25 This evidence base will include a key species list for Cumbria which will include protected, priority and Cumbrian BAP species (currently around 103 species). Other data sets already exist at County level: the 278 parcels of SSSI covering 1,023,108 hectares; the 11,562.6 hectares of National Nature Reserve and the 424.8 ha of LNR. These and other data sets will need to be disaggregated to match the MW Plan area. (See Map 2 for location of nature reserves).
- 9.26 The lack of time and resources has not allowed a more thorough assembly of a biodiversity evidence base. However this is being addressed through the establishment of a baseline working group and broad agreement has been reached on the need to commission an organisation to build a usable evidence base from the wealth of records which exist.
- 9.27 The MW plan area excludes both national parks and therefore more or less excludes the Cumbria High Fells and the South Cumbria Low Fells. The overlap is approximate and not exact.
- 9.28 The plan area is made up of distinct character areas (Map 3 illustrates this for Cumbria as a whole).The Solway Basin has stretches of sandy and pebble beaches backed by dunes and raised beaches along the Irish Sea. These give way to the inter-tidal mud-flats of the Solway Firth. Other features include Victorian seaside resorts, raised peat bogs, and narrow country lanes winding through gently, undulating pastureland with little tree cover.
- 9.29 The West Cumbria Coastal Plain stretches south from Maryport to Barrow in Furness. The main towns abut areas of industrial activity or redundant industrial land. The coastline contains a mixture of mudflats, shingle and pebble beaches interspaced with smaller areas of dunes, sandy beaches and sandstone cliffs. Inland undulating or flat pasture with hedgerows and some tree cover is the dominant feature. Wetlands and herb-rich meadows exist along with river valleys

- with some semi natural ancient woodland. Elsewhere there are extensive areas of estuary with a range of inter-tidal habitats.
- 9.30 The River Eden and its tributaries dissect the Eden Valley. These river valley landscapes sit amidst open, rolling mixed farmland, neatly delineated by hedgerows and drystone walls. Broadleaved woodland is common and settlements are generally constructed from red sandstone, although around the fringes, limestone construction is the norm. On either side of the Valley foothills, unimproved grassland and moorland merge into the wilder Cumbrian High fells and the North Pennines.
- 9.31 The Orton Fells lie within a line drawn south east from Penrith to Kirkby Stephen, then west to Tebay, north to Shap and north west to Askham. The bulk of the area lies within the plan area.
- 9.32 The Orton Fells are distinguished by moorland with extensive areas of limestone pavements, rock outcrops, scree and calcareous grassland. There are few trees and few deep flowing rivers or streams. Sheep are reared on the higher, rough pastures while lower down grass is grown for hay, silage and winter grazing. Dwellings and field boundaries are built with limestone.
- 9.33 The Howgill Fells form a heart shape range of rounded hills bounded by Tebay, Sedbergh and Ravenstonedale. Only the northern half of the Howgills falls in the plan area. The landscape comprises ridges and valleys, with steep scree slopes, occasional waterfalls and crags, open moorland with rough grass and bracken, few trees, few settlements all of which combines to give a sense of wilderness. Farming is dominated by sheep with cattle rearing confined to the lower slopes.
- 9.34 Finally the plan area stretches from Grayrigg across to Burneside down through Kendal to Arnside and eastwards to Kirkby Lonsdale. This area is part of the South Cumbria Low Fells noted for undulating pastureland, areas of woodland and managed estates which give a parkland appearance. Settlements again built of limestone.

Minerals

- 9.35 Cumbria has a range of mineral sites that are currently worked commercially and produce hard rock, sand and gravel, high specification roadstone, industrial limestone, limestone, sandstone, slate, gypsum, mudstones and peat.
- 9.36 There are 14 hard rock quarries including 3 that straddle the LDNP boundary. In addition there are 3 roadstone quarries, 14 active sand and gravel quarries, 18 building stone quarries (possibly not all active), a gypsum mine, a mudstone quarry and 2 lowland peat extraction sites.
- 9.37 Other commercial mineral activity includes dredging sand from the seabed, recovering aggregates from waste created in quarrying, and recycling of construction and demolition wastes.
- 9.38 Planning permission exists for 169.4 million tonnes of crushed rock and 12.85 million tonnes of sand and gravel. Other sources of metal bearing minerals exist,

particularly lead and zinc. However these have not been worked since World War 2. Coal seams also run from Whitehaven to Wigton but none are now commercially worked.

Waste

- 9.39 Municipal waste for all of Cumbria increased from 318,000 tonnes in 2004/05 to 358,000 tonnes in 2005/06. Recycling of household waste increased from 13.61% in 2004/05 to 16.12% in 2005/06. A further 11.94% of household waste was composted in 2004/05 rising to 13.81% in 2005/06. The amount sent to landfill dropped from 74.45% in 2004/05 to 70.07% the following year.
- 9.40 In Cumbria the amount of household waste collected per capita was 635.88kg in 2005/06 which represents a fall of 2.03% from the previous year. The cost per tonne of household waste collection and management is estimated at £47.45 per tonne.
- 9.41 There are 4 major landfill sites in the county and 3 transfer stations. Capacity for municipal waste is estimated at 5.5 million cubic metres. Hazardous waste is sent to other parts of the UK. There is some localised energy generation from landfill gas but municipal waste is not converted into refuse derived fuel for energy generation.
- 9.42 No information is available on commercial and industrial waste but a survey has been commissioned to try and estimate waste types and quantities arising ⁽⁸⁾.
- 9.43 Cumbria generates and stores nuclear waste. It also acts as an unofficial national waste repository for low level radioactive waste. Current information suggests that there is around 2,000 m³ of high level waste at Sellafield of which 655m³ has been vitrified. Intermediate waste levels at Sellafield are in excess of 39,000m³ the vast majority of which is in storage. Around 4,000m³ of low level waste is stored at Sellafield however a further 18,970,000m³ of land is thought to be contaminated and classed as low level waste.
- 9.44 At Calder Hall decommissioning work is expected to generate 7,200m³ of ILW by 2117; 71,000m³ by 2117; and 7,500m³ of hazardous waste (asbestos) over the same period. At Drigg, the LLW repository, there is an estimated capacity for 1.7million m³ of LLW. At present there is thought to be around 900,000m³ emplaced.

Biodiversity

- 9.45 Cumbria is rich in habitats and species. Within the Solway Basin, key habitats are saltmarsh and grazing marsh, sand dunes, vegetated shingle, lowland raised mire, valley woodlands, rivers and hay meadows. The Solway Estuary attracts wintering and passage waders and wildfowl many of which use the saltmarsh and nearby unimproved grassland to roost and feed. Internationally important species include pink footed goose, the barnacle goose, oystercatcher, knot, bar-tailed godwit, curlew and redshank. Species of principal importance include the European Otter, the Brown Hare, Pipistrelle Bat, Red Squirrel, Skylark, Nightjar, Linnet, Reed Bunting, Corn Bunting, Spotted Fly-catcher, Tree Sparrow, grey

partridge, Bullfinch, Natterjack Toad, Great Crested Newt and the Square-spotted Clay Moth. Many other species of birds and bats have been recorded in the Solway Basin. Other species of interest, many of which are considered to be nationally scarce include numerous water and ground beetles, weevils, dragonfly, a variety of flies, grasshoppers, moths, spiders, bugs, liverworts, mosses and vascular plants.

- 9.46 The West Cumbrian Coastal Plain also has saltmarshes around the Duddon Estuary, at Drigg and at Walney Island. Other important habitats include sand dunes, dune grassland, dune heath, vegetated shingle, coastal grasslands, St. Bees Head sea cliffs, rivers and floodplains, unimproved hay meadows, tarns and ponds, semi-natural woodland, hedgebanks, lowland and raised mires. Principal bird species and amphibians are the same as those listed for the Solway Basin. Again there are numerous nationally scarce species of beetle, crustacean, moth, and assorted insects, mosses and vascular plants. Two distinctive species are present: *Cicendela hybrida* a ground beetle and *Margaritifera margaritifera* a freshwater mussel.

Eden Valley

- 9.47 The biodiversity interest centres on the aquatic environments of the River Eden, its tributaries and adjacent habitats. The geology of the area gives the Eden mid range nutrient status which results in a high diversity of aquatic plants. Riparian habitats include gorge woodland with varied tree and shrub cover dependant on soil type and moisture levels. South of Lazonby there is a broad floodplain but with few habitat features normally associated with floodplains with the exception of the Salkeld area where oxbow lakes, ponds, swampy woodland and old channels can be found. Near Ormside there is large area of floodplain comprising wet grassland, marsh and pools which attract wintering and breeding wildfowl.
- 9.48 Other principal habitats include basin and raised mires, many of which are designated as SSSIs, remnant lowland heathland which provides one of the few suitable habitats for the nightjar, lowland grassland (species rich, traditionally managed), wet or seasonally inundated meadows, hay meadows and hay meadow fragments, and away from the river banks areas of semi natural woodland, particularly those with rich shrub layers.
- 9.49 Principal vertebrate species are broadly similar to those found in Solway Basin and the West Cumbria Coastal Plain. Additional Principal species include the Bittern, the Wryneck (not breeding) Marsh Clubmoss and a moss (*Fissidens exiguus*) and White Clawed Crayfish. Again there are numerous vascular plants and mosses.

Orton Fells, the Howgills and parts of the South Cumbria Low Fells

- 9.50 The Orton Fells form a limestone ridge characterised by limestone pavements. Drift deposits allow heath and acidic grassland to become interspaced with the limestone outcrops. Lime rich springs and flushes support rare plant and invertebrate communities while Sunbiggin Tarn supports aquatic and fen communities. Other important habitats include unimproved lowland meadows and remnant woodlands around gills.

- 9.51 Vegetation cover on the Howgill Fells is largely acidic grassland with expanses of bracken on lower slopes and remnant areas of heather. Springs and flushes on lower slopes add diversity of habitat and support comparably more plants than nearby grassland. Again remnant woodlands can be found on lower slopes or in gills. Gills are important for mosses, liverworts and ferns.
- 9.52 South Lakes Low Fells are associated with extensive semi-natural and coniferous woodland, improved grassland and large areas containing a mixture of grassland, heath, mire and juniper scrub.
- 9.53 Limestone pavements, scars and screes, limestone grassland and ash and yew woodlands surround Morecambe Bay. Mosaics of these habitats are particularly important for invertebrates, especially butterflies. The species-rich limestone grasslands of Morecambe Bay and Orton are characterised by the scarce blue moor-grass which is restricted to northern England and areas of Scotland. Extensive areas of raised mire are found at the head of the Leven and Kent estuaries, however many have been cutover for peat or reclaimed for agriculture.
- 9.54 Parts of the South Lakes Low Fells extend as spurs of lower-lying extensively wooded and semi-improved/ improved agricultural land, with some open heather moorland, outwards from the Lake District to Barrow and Grange-over Sands. Semi-natural areas are often complex mosaics of acid or limestone grassland, heath and small valley and basin mires.
- 9.55 Species of principal importance include 7 possibly 8 bat species, common dormouse at the northern edge of its range, otter which has recently re-colonised all south Cumbrian rivers, great crested newt, white-clawed crayfish, high brown fritillary, pearl-bordered fritillary and northern brown argus, geyer's whorl snail and the sandbowl snail.
- 9.56 The limestone habitats support 8 nationally rare and 15 nationally scarce plants including dark red helleborine, limestone fern, hoary rock-rose, limestone bedstraw and mezereon, whilst the calcareous flushes of the Orton area support bird's eye primrose.

10. Identifying Sustainability Issues and Problems

- 10.1 In Cumbria, the County Council's Sustainability Team had already identified a profile of key issues and pressures affecting Cumbria in 2002 and had used this list as the basis for developing a set of sustainability objectives. These objectives were adopted by the County Council in 2004⁶ and are used to guide County Council policy development. These sustainability objectives also provided the basis for an earlier version of a sustainability appraisal framework.
- 10.2 The original sustainability appraisal framework was used to carry out sustainability appraisals of the Cumbria and Lake District Joint Structure Plan 2001-2016 and sustainability appraisals of the Barrow, South Lakes and West Cumbria community strategies. During these appraisals the sustainability framework was refined in discussion with participants in the appraisal process and also modified in the light of practical experience.
- 10.3 The advent of the SEA Regs 2004 and early draft Government guidance on conducting sustainability appraisals to ensure that they met the requirements of the SEA Directive led to the establishment of a sustainability group. Membership was drawn from the 4 statutory consultees, the 6 district councils, the Lake District National Park Authority and the County Council.
- 10.4 These discussions explored areas of mutual interest and possible joint working on sustainability appraisals and the availability of baseline data.
- 10.5 The existing set of key issues and pressures affecting Cumbria originally developed by the Sustainability Team was re-examined by the group and by other colleagues in the County Council's planning and economic development units. As a result of this consultation process the Profile of Key Issues and Pressures was added to and refined by drawing on the detailed knowledge of the consultees. The list was further widened to specifically include a new section on resources so that the profile would be relevant to the Cumbria MWDF preparation process.
- 10.6 The revised profile of Key Issues and Pressures Affecting Cumbria is shown at Appendix 5.
- 10.7 The profile of key issues helps demonstrate how intertwined the different sections of the scoping report are since the key pressures relate to sustainability, help shape the sustainability framework and add to the size of the evidence base for policy-making.
- 10.8 This consultation on key issues and pressures led to the emergence of a further refined set of sustainability objectives:
 - To make more affordable housing available
 - To improve access to facilities
 - To create safer communities
 - To improve education opportunities
 - To retain young people in Cumbria
 - To widen employment opportunities

- To diversify the economy
- To develop growth sectors within the local economy To protect and enhance species and habitats
- To improve the quality of water resources
- To adapt to climate change
- To protect designated landscapes
- To conserve the character of the built environment
- To protect people from floods
- To minimise waste and recycle more
- To secure modern sustainable waste management facilities
- To sustainably manage mineral resources
- To increase the supply of recycled material used in lieu of mineral resources

10.9 This revised list of sustainability objectives was fed into the sustainability appraisal framework development process.

11. Developing the Sustainability Appraisal Framework

- 11.1 The County Council's Sustainability Team had already developed a sustainability appraisal framework which had been tried and tested in the sustainability appraisal of land use plans and community strategies. The sustainability group made up of the district councils, the LDNPA, English Nature, English Heritage, the Environment Agency, the Countryside Agency and the County Council took this appraisal framework as a starting point and compared it to the revised list of sustainability objectives which came out of the key pressures exercise.
- 11.2 This led to a composite framework being developed based around the revised list of sustainability objectives thrown up by the key pressures exercise. Further discussion on the range and meaning of the list of sustainability objectives led to further refinement of the list of objectives and their precise wording.
- 11.3 Each objective was originally accompanied by a series of questions which were designed to guide the appraisal process and allow the appraiser to test whether or not the plan was likely to contribute to a particular objective. These were modified in the light of the consultation process and the knowledge and experience of the members of the group.
- 11.4 In developing the revised framework, care was taken to ensure that the SEA Directive's environmental objectives were also comprehensively included.
- 11.5 This consultation process has led to the adoption by the Cumbrian local authorities and the Lake District National Park of a robust sustainability appraisal framework which has the approval of the 4 statutory consultees and is based on a tried and tested methodology. This new sustainability appraisal framework is being used as the basis for sustainability appraisals across Cumbria.
- 11.6 While this framework is generally regarded as a comprehensive framework that can be applied 'off the shelf' to carry out appraisals, clearly some plans are of a specialist nature and therefore further refinement may be necessary to tailor the framework to a specific plan. In the case of the Cumbria MWDF the general framework has been altered, not significantly from that previously agreed on, but sufficiently to increase its suitability for the task of appraisal of the MWDF. The revised sustainability appraisal framework which will be used in the MWDF is shown
overleaf.

Sustainable Development Framework for Cumbria Minerals and Waste Local Development Framework

Reference	Sustainability Objectives	Sustainability framework: Guidance on making progress towards each objective
Social progress that recognises the needs of everyone		
SP1	To increase the level of participation in democratic processes	Does the plan encourage and empower local people to become involved? Are all members of society able to participate fully in decision making processes? Does the plan identify and set out how hard to reach groups will be involved? Will policies encourage local liaison committees to be set up with elected local representation? Do plan policies respect the needs of all communities and future generations?
SP2	To improve access to services, facilities, the countryside and open spaces	Does the plan improve access and affordability for all to services, essential goods, facilities, including recycling facilities, education and employment opportunities (where possible within local communities using sustainable transport choices)? Does it help retain essential local facilities and ensure that physical access is suitable for those with a disability? Does the plan promote and facilitate access to, and opportunities to enjoy, the countryside and natural green space?
SP3	To provide everyone with a decent home	Will the plan help meet local housing need by ensuring that good quality, resource efficient, affordable housing with reduced environmental impact is available to all?
SP4	To improve the level of skills, education and training	Will the plan deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in society? Does the plan recognise the need for people to adapt to economic change and retrain where necessary? Does the plan enable people to live sustainable lifestyles?
SP5	To improve the health and sense of well-being of people	Do plan policies ensure all members of society have access to the health care that they require? Do they reduce health inequalities within society associated with income, lifestyle and diet? Does the plan help create a healthy and safe working and living environment with low rates of crime and disorder and minimal disruption and nuisance from nearby minerals and waste activity? Does the plan help improve local amenity and quality of life for all?
SP6	To create vibrant, active, inclusive and open-minded communities with a strong sense local history	Does the plan promote a sense of community identity? Does it encourage social cohesion and help continue valued local traditions? Is recreational and cultural activity embracing the arts, heritage, the environment, dialect and sport promoted along with multicultural understanding, respect for all and equality of opportunity?

Effective protection of the environment		
EN1	To protect and enhance biodiversity	Does the plan protect and conserve designated habitats and protected species? Will the plan ensure biodiversity sustainability by enhancing conditions whenever necessary to retain viability of the resource? Do policies minimise adverse impacts on species and habitats through human activities and development? Do policies ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species? Will policies give effect to actions in the Cumbria BAP?
EN2	To preserve, enhance and manage landscape quality and character for future generations	Is local landscape quality, distinctiveness and character protected from unsympathetic development and changes in land management? Will the plan protect areas of designated landscape value? Is the remoteness and tranquillity of landscapes maintained? Is the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings protected? Are areas of high archaeological and historic landscape sensitivity protected? Will policies extend and sustain tree cover and hedgerows?
EN3	To improve the quality of the built environment	Does the plan conserve features of historic and archaeological importance? Will policies ensure that new development is of high quality, sympathetic to the character of the built environment, strengthen local distinctiveness, enhance the public realm and help create a sense of place? Will policies promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation? Will policies guide inappropriate development away from flood risk areas? Do policies ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated? Will the plan reduce noise levels, light pollution, dust, fly tipping and enhance degraded urban environment?
Sustainable use and management of natural resources		
NR1	To improve local air quality and reduce greenhouse gas emissions	Will the plan ensure that local air quality is not adversely affected by pollution from onsite activity and seek to improve it where necessary? Will policies limit or reduce the emission of greenhouse gases (including methane) and other air pollutants? Will the use of clean, low carbon energy efficient technologies be encouraged? Will policies maximise the use of energy from renewable resources? Will they reduce the need to travel especially by car, and switch goods from roads onto the rail network? Will the plan introduce strategies to adapt to and mitigate other climate change impacts?
NR2	To improve water quality and water resources	Will the plan help maintain and, where possible, improve the quality and quantity of all water resources? Will it minimise the risk of water pollution from minerals and waste sources? Will policies ensure sustainable drainage systems are widely used? Will policies lead to the

		effective management of demand for water, prevent stress on the natural environment and help water users adapt to the impacts of climate change?
NR3	To restore and protect land and soil	Will policies protect areas of designated geological value? Will the plan encourage development on brown field sites, using sustainable remediation technology to treat contaminated soils on site? Will it minimise the loss of greenfield sites or areas of open space? Will policies prevent soil degradation, pollution of soil and the use of peat? Will policies ensure that sites are fully restored and blend sympathetically with the surrounding landscape?
NR4	To manage mineral resources sustainably and minimise waste	Will the plan ensure a steady, sustainable flow of minerals and the efficient use of materials? Will policies protect mineral resources from sterilisation? Will policies minimise the extraction, transport and use of primary minerals and encourage the use of recycled material? Will the plan minimise the amounts of industrial, commercial and household waste generated and landfilled and encourage increased re-use, recovery and recycling? Will it promote the use of energy recovered from waste? Will policies encourage the use of secondary and recycled materials? Will the plan help raise awareness of the need for waste minimisation amongst consumers and industry? Will policies deliver sufficient waste management facilities?
Building a sustainable economy in which all can prosper		
EC1	To retain existing jobs and create new employment opportunities	Will the plan increase the number, variety and quality of employment opportunities including those offered by minerals and waste sectors? Will policies increase rural employment opportunities? Will the plan support local businesses? Will the plan help retain a skilled workforce and graduates in Cumbria?
EC2	To improve access to jobs	Will plan policies increase access for all to a range of jobs through improved training, sustainable transport and communication links? Will the plan lead to the location of new employment opportunities in areas of greatest need?
EC3	To diversify and strengthen the local economy	Will the plan help create the right climate and infrastructure provision to encourage private sector investment generally and also in the minerals and waste sectors? Will it encourage growth across all sectors? Will it stimulate the use of local companies, local materials, products and services and provide other forms of community benefit? Will it help increase the environmental performance of local companies and their products/services? Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas? Does the plan provide financial assistance? Will it help improve the competitiveness and productivity of the local economy? Do policies support research and development into environmental and other new key sector technologies including opportunities to recycle and re-use waste products?

12. Testing the plan objectives against the sustainability objectives

12.1 The Minerals and Waste Planning Authority has developed a number of draft MW Plan objectives to help with the development of the core strategy. The draft MW objectives are set out below:

- to seek to minimise the impacts of minerals and waste developments on climate change;
- to make provision for the supply of the minerals needed by society from environmentally acceptable sources;
- to make provision for the waste management facilities that Cumbria needs to drive waste management up the waste hierarchy in accordance with; the targets of the national waste strategy;
- to seek maximum local economic benefits from minerals and waste developments;
- to promote efficient use of minerals and the reuse / recycling of suitable materials in order to minimise the need for new primary extraction;
- to help secure the management of waste as near as possible to its place of production without endangering human health and without harming the environment;
- to secure sound working practices so that the environmental impacts of minerals and waste developments, including traffic, are kept to a minimum;
- to protect, and where possible, to enhance the overall quality of the environment once developments are completed through high standards of restoration;
- to help to conserve and safeguard mineral resources.

12.2 The draft MW Plan objectives have been tested against the sustainability objectives to determine whether or not the Plan objectives are likely to contribute to sustainable development in Cumbria or not. This compatibility analysis of the plan objectives with the sustainability objectives provides the plan-maker with guidance on developing strategic options for the CMW DPD which follow sustainability principles.

12.3 A number of points emerged from the compatibility analysis. In general the meaning given to the draft MW plan objectives indicated that they would do little for jobs or indeed the local economy. Interpretation suggested planning gain for local communities would result but the draft plan objective on 'maximising local economic benefit from minerals and waste developments' left it uncertain on how this might lead to additional jobs or indeed boost the local economy. While some new jobs relating to recycling could reasonably be foreseen there was a strong possibility that these might be offset by more efficient use of minerals and reduced primary extraction. The overall effect on the diversity and strength of

the economy was uncertain and may even be negative given a second objective which aims to conserve and safeguard mineral resources.

- 12.4 Clearly a strong and healthy economy and prudent management of natural resources are cornerstones of a sustainable society. However these draft MW plan objectives are too broad to explain clearly how the local economy will be affected and how resources will be managed. That said, the objectives appear to sit well with sustainability principles.
- 12.5 The objective on environmental protection at first glance seems to accord with sustainability principles and should benefit landscape, water resources and soil in and around previously active sites. However, the objective has a specific focus on best practice relating to site restoration. It only kicks in to protect and enhance the environment once permission has been given to damage it in the first place. The objective would be more honestly expressed if the wording focused on best practice restoration of redundant sites.
- 12.6 This suggests that there is a gap in the objectives relating to the natural environment. Biodiversity might benefit from some objectives but not directly. Other objectives will benefit biodiversity directly but in a limited site related way. Similar comments can be made about landscape quality and character. If the plan is to resonate with sustainability then a more positive approach needs to be reflected in the objectives on accepting the value to society of biodiversity and landscape quality and the need to control minerals and waste activity within natural environmental parameters.
- 12.7 Protection of the natural environment appears to be a secondary consideration and if the plan objectives are to sit more comfortably with sustainability then the objectives need to place a higher value on the natural environment as an overarching principle to guide and manage minerals and waste activity. The other objective which touches on this talks about the supply of minerals from 'environmentally acceptable sources'. This phrase has no real meaning and reinforces the need for a specific objective on protection of the natural environment and its various components (biodiversity, landscape, water etc.).
- 12.8 It needs to be remembered that the Cumbria MW DPD is dealing with non renewable resources. To sustainably manage minerals extraction and reduce waste arising in Cumbria the plan objectives need to promote sustainable production and consumption in line with government policy. The current draft objectives on supply and conservation of minerals skirt round this without grasping the issues firmly. Equally there is not one objective which addresses waste minimisation. Moving up the waste management hierarchy may allude to this but it fails to give adequate weight to waste minimisation.
- 12.9 It may be that this could be dealt with by expressing this need to provide minerals and waste management facilities within a robust, environmentally protective planning regime as an overall plan aim within which the objectives, suitably rephrased, operate.

- 12.10 Other objectives show no conflict with sustainability principles. Promoting high standards of environmental management on site and minimising intrusion in local communities contribute to peoples' well-being and amenity. However the plan objectives could be more positive in involving local people through liaison committees and the planning process itself.
- 12.11 Few objectives conflict with sustainability principles but a number of objectives simply do not contribute to sustainability at all. This is shown by the number of 'no effect' symbols in the compatibility matrix. A more sustainable set of plan objectives would result in more ticks and fewer 'no effect' symbols. Equally there are quite a few question marks. This reflects the uncertainty of the objectives as presently worded. In this sense the objectives could be made more sustainable if the wording was made more concise.
- 12.12 One example of this is the objective dealing with the provision of minerals needed by society. There is no hint of demand management. As such it conflicts with sustainability principles and indeed other draft plan objectives on conserving and safeguarding mineral resources. The plan itself would benefit from the use of some form of consistency testing of the draft plan objectives against each other.
- 12.13 Other objectives on moving away from landfill, ensuring minerals and waste activity responds positively to the threat of climate change and minimising primary minerals extraction all fit well with sustainability principles.
- 12.14 The compatibility analysis carried out is summarised in the following table.

Draft Minerals and Waste Plan Objectives										
Draft Sustainability Objectives	Minimise impact of MW development on climate change	Provide the supply of minerals needed by society from environmentally acceptable sources	Provide waste management facilities to move waste management up the waste hierarchy	Maximise local economic benefits from M & W developments	Promote efficient use of minerals and re-use and recycling to minimise primary extraction	Ensure waste is managed safely at or near point of origin with no environmental impact	Promote environmental awareness to minimise onsite and offsite environmental impacts	Protect and enhance the environment through high standards of restoration	Conserve and safeguard mineral resources	
	SP1	⊙	? ☒	? ✓	⊙	? ✓	⊙	⊙	⊙	⊙
	SP2	? ✓	✓	✓	?	⊙	⊙	⊙	⊙	⊙
	SP3	⊙	✓	⊙	⊙	⊙	⊙	⊙	⊙	⊙
	SP4	⊙	⊙	⊙	⊙	⊙	⊙	✓	⊙	⊙
	SP5	?	?	?	?	⊙	✓	✓	?	⊙
	SP6	⊙	⊙	⊙	?	⊙	⊙	⊙	⊙	⊙
	EN1	?	? ✓	?	⊙	✓	✓	? ✓	?	⊙
	EN2	⊙	? ✓	?	⊙	✓	✓	⊙	✓	?
	EN3	? ✓	✓	?	?	?	? ✓	? ⊙	⊙	⊙
	NR1	✓	⊙	⊙	⊙	✓	✓	✓	⊙	⊙
	NR2	?	?	?	⊙	? ✓	✓	✓	? ✓	⊙
	NR3	⊙	? ☒	?	⊙	?	? ✓	✓	✓	⊙
	NR4	? ✓	☒	✓	⊙	✓	✓	? ✓	⊙	? ✓
	EC1	⊙	⊙	? ✓	? ✓	?	⊙	⊙	⊙	⊙
	EC2	⊙	⊙	⊙	?	⊙	⊙	⊙	⊙	⊙
	EC3	⊙	⊙	⊙	? ✓	⊙	⊙	⊙	⊙	☒
Key: Compatible ✓; Incompatible ☒; No effect ⊙; uncertain ?;										

13. Consultation

- 13.1 The County Council has already published a Statement of Community Involvement (SCI) which states that the County Council intends to consult widely on the Minerals and Waste Development Framework. The SCI sets out how the Council intends to carry out this consultation process with all sections of the community.
- 13.2 The SCI details consultation letters, publications, notices, e-mail and website use. Additional outreach techniques will also involve public exhibitions, displays and meetings to provide information about the DPD process and get feedback at various stages of the plan-making process.
- 13.3 Consultation on the DPD process will also take place with a range of organisations including district councils, local strategic partnerships and neighbourhood forums.
- 13.4 There is also a need under recent planning regulations⁷ and the SEA Directive itself to consult on the sustainability appraisal report at various stages of its production. This scoping report set outs how the Council intends to consult on the sustainability appraisal.
- 13.5 Prior to work beginning on the Cumbria MWDF the County Council started a period of discussion with the 4 statutory consultees (English Nature, English Heritage, the Environment Agency and the Countryside Agency), the Lake District National Park and the 6 district councils on sustainability appraisal methodology and the need for baseline data.
- 13.6 These discussions helped identify which organisations held relevant data sets and explored possible mechanisms for sharing data. The discussions also agreed the list of key issues and pressures affecting Cumbria and agreed a general sustainability framework for use across Cumbria. It was this general framework which was adapted for use in the Cumbria MWDF sustainability appraisal.
- 13.7 In addition to the 4 statutory consultees, the planning regulations⁷ also list a number of specific consultation bodies that must be consulted. These include regional planning bodies and regional development agencies along with the Strategic Rail Authority, the Highways Agency, telecoms companies, the Strategic Health Authority, gas, electricity, water and sewage companies.
- 13.8 Additional bodies are identified as possible consultees. These include government departments, voluntary organisations, environmental groups, and a myriad of social and industry related groups. Consultation with these bodies at each stage of the sustainability appraisal process is at the discretion of the Council.
- 13.9 The following organisations were identified as specific consultation bodies:
- Carlisle City Council, Allerdale Borough Council, Copeland Borough Council, Eden District Council, South Lakeland District Council and Barrow Borough Council;
 - The Yorkshire Dales National Park Authority and The Lake District National Park Authority;
 - The North West Development Agency.
 - The North West Regional Assembly.

- The Strategic Rail Authority.
- The Highways Agency.

- 13.10 Cumbria County Council's Sustainability Team has compiled a list of environmental organisations to be consulted, along with minerals and waste operators and industry consultants. Other companies and voluntary and social sector organisations which operate in Cumbria and may have an interest in the outcome have also been identified for consultation.
- 13.11 As part of the consultation process an earlier draft scoping report was posted on the County Council's web site to enable public comment: (<http://www.cumbriacc.gov.uk>). Paper copies were also made available at major Council offices in Carlisle and Kendal as well as main libraries and information centres.
- 13.12 Paper copies were issued to the 4 statutory consultees, the district councils and the national parks as well as the lists of specific and general consultees referred to above.
- 13.13 The consultation period on the draft scoping report ended on 7th February 2006.
- 13.14 All comments received have been set out at Appendix 7 to the Scoping Report along with actions which the Sustainability Team will take in response to this feedback.

References

- (1) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, London. November 2005.
- (2) A Practical guide to the Strategic Environmental Assessment Directive, ODPM, London. September 2005.
- (3) Securing the Future: delivering UK sustainable development strategy, DEFRA. London. March 2005.
- (4) Planning Policy Statement 1: Delivering Sustainable development, ODPM. London. 2005.
- (5) Draft Annual Monitoring report 2004/05 for the Cumbria Minerals and Waste Development Scheme, Cumbria County Council, Kendal. November 2005.
- (6) Sustainability Strategy, Cumbria County Council, Carlisle. January 2004.
- (7) Planning Policy Statement 12: Local Development Frameworks, ODPM, London. 2004
- (8) Commercial and Industrial waste and construction and demolition waste Surveys commissioned by the Northwest Authorities and being carried out by Urban Mines LTD and Smiths Gore.

Glossary

North West Technical Advisory Body: this group was established in 1999 to advise the North West Regional Assembly on how to structure the region's waste strategy. It brings together representatives of the waste management industry in the Northwest to study waste production and make recommendations on the way it should be managed in the future.

North West Regional Aggregates Working Party: this body operates under the ODPM and undertakes annual surveys of production and reserves of aggregates. Taking demand into account (both from within the Region and nationally) the RAWP estimates the need for further planning permissions for minerals extraction across the Region to meet regional and national demand and allocates supply quotas to sub-regional areas]. RAWP reports provide a comprehensive set of statistics on minerals planning and minerals production.

4 Statutory Consultees: English Nature, Countryside Agency, Environment Agency and English Heritage. PPS 12 on Local Development Frameworks, ODPM 2004 identifies the 4 statutory consultees as organisations which must be consulted on sustainability appraisal of Local Development Documents in accordance with the town and Country Planning (Local development) (England) Regulations 2004.