

**Statement on Matter 4 – Minerals Strategy on Cumbria
County Council's Minerals and Waste management Plan by F
B Thompson**

Matter 4 – Minerals Strategy

Issue: Do the strategic minerals policies provide sufficient opportunities for maintaining a steady and adequate supply of important minerals in a sustainable way and for appropriately safeguarding resources?

The mineral strategy plan is hamstrung by its focus mainly on aggregates and acting as little brother to the waste management part of the plan. Thus the major filter used for sites seems to be generally something called WASTE MANAGEMENT SCORING MATRIX. This in itself is flawed (see Appendices 3 to 7) at least in respect of sites ED1 ED3 ED31 and ED5

focus on plans

Land-won Primary Aggregates

A

25. It is not clear whether Table 5.2 includes any limestone that is used for industrial lime or building stone. However Cumbria County Council did identify the ED5 as potential source of building stone in their 2007 document. My original and subsequent submission for Flusco Lodge Quarry ED5 specifically mentions building stone. (see Appendix 1). In 2011 I drew attention to this omission in the first draft of the MWDP so in my response. I noted that *Cumbria County Council seems to have overlooked Flusco Lodge Quarry, Stainton, Penrith, Cumbria for its draft Minerals and Waste Local Plan 2015 to 2030. This despite having identified the site in 2007 in its Minerals and Waste Development Framework both as a potential waste management site and as a potential quarry site for limestone and sandstone building stones and aggregates.*

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1. *Quarrying SP7/D12*

The site is ideal for use of the dormant quarry and brickworks as an environmentally friendly, low impact quarrying operation. This

would extract the stone mechanically, without explosives, using skilled labour. It has significant reserves of both hard Carboniferous limestone suitable for building stone and orange grey Carboniferous sandstone Bore holes show that there are four metres of hard carboniferous limestone over one and a half metres of sandstone. The product range would include hand dressed walling stone, gate stoops, architectural 'wild stones' and stone armour for river bank protection.

Thus Cumbria County Council have been aware since 2007 of the demand but appear to let it fall of the radar in their concentration on Waste and Aggregates

Industrial Minerals

B

12. There is little evidence to demonstrate how the chosen vision/strategy and objectives were arrived at and have all reasonable alternatives been considered. Cumbria County Council appear in their concentration on Waste seem to have given little attention to minerals as evidenced by their Site Scoring Matrices generally prefixed by the word WASTE.

Building Stone

C

36. Besides Kirkby Slate building stones are of significant importance to the local economy I specifically mentioned building stone in 1997, 2010 and in my last response to no avail. I have recently been approach by one Cumbria Quarrying based near Penrith with a view to extracting limestone and carboniferous sandstone building stone. In addition local builders are interested in buying stone from the quarry for building and walling stone. Examples from Blencowe and Stainton of the use of the carboniferous sandstone in vernacular buildings are shown in Figures 1a and 1b below.

Figure 1a



Figure 1b



There are 14 natural stone merchants listed in Yell Stone Merchants in Cumbria, the sites of 13 are shown below in Figure 2. This demonstrates the need for the product other sites as far away as Essex advertise the product

Figure 2



37. There is insufficient policy support for the winning, working and processing of the different types of building stone apart from slate from the plan.

38. Apart from Kirkby Slate Quarry, the criteria based policy (DC12) to determine building stone development proposals is totally inadequate.

Thus the Plan is unsound as it is not positively prepared and fails to meet objectively assessed development requirements. Using inadequate Scoring Matrices (see above) with scoring in these Scoring Matrices is incorrect and only partially completed in some cases. (See Appendices 3, 4, 5, 6 7) Further more the system it presents the almost insurmountable problem of the relative weighting for the different parameters. It poses the challenge of how a system using two ticks, one tick, one cross, two crosses and a question mark can be used to compare and prioritise the different sites.

- The plan is not positively prepared is based on flawed data flawed analysis of infrastructure requirements.
- Justified – the plan is not the most appropriate strategy, reasonable alternatives, eg ED5 have been eliminated based on flawed evidence;
- Effective – the plan is not deliverable over its period given the changes shown over the 10 years of its gestation (see ED1, ED2 and ED5)
- Given the above it may not be consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- The Plan is unsound in its selection process and data used.

- Why it fails as the Council has failed to disprove my contention that site ED5 is suitable as a waste treatment site (see Appendix 2 and Appendices 1 to 6)
- The Plan can be made sound in this respect by including ED5 as a building stone quarry with the field to the east as a search area for minerals in exchange for the surrender of dormant quarry area in the National Park (see Appendix 8). This will compensate for loss of the search area at ED1 Blencowe.