

Mr Shaun Gorman
Cumbria County Council
Environment Unit
County Offices
Kendal
LA9 4RQ

Our Reference: DP6

Your Reference: MMM/p334/004

13/12/2007

Dear Mr Gorman

**Cumbria Minerals and Waste Development Framework: Pre-submission
Consultation on Changes to Preferred Options**

Thank you for the opportunity to comment on the above document. The following represents officer level comments on the consultation document.

I would like to take this opportunity to inform you of the current situation regarding the Regional Spatial Strategy. As you are aware the Adopted RSS Regional Planning Guidance for the North West (RPG13)¹ now forms an integral part of the development plan and should be given due consideration when assessing planning documents. In addition the Submitted Draft Regional Spatial Strategy for the North West of England² has now undergone a number of periods of consultation, with an Examination in Public which ended on the 15th February 2007. The panel report was published on the 8th May 2007³. As the document is now somewhat progressed in the process towards its adoption, it should also be given some consideration when assessing planning documents.

¹ Regional Planning Guidance for the North West (March 2003) RPG13 -

<http://www.go-nw.gov.uk/gonw/Planning/RegionalPlanning/RegionalPlanningGuidanceNW>

² The North West Plan (January 2006) Submitted Draft Regional Spatial Strategy for the North West of England –

http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=223

³ North West Draft Regional Spatial Strategy Report of the Panel (May 2007)

http://www.nwra.gov.uk/whatwedo/issues/environment/?page_id=300

The **North West Regional Assembly** is a partnership of local government, business organisations, public sector agencies, education and training bodies, trade unions and co-operatives together with the voluntary sector, working to promote the economic, environmental and social well-being of the North West of England (Cheshire, Cumbria, Greater Manchester, Lancashire and Merseyside)

The Assembly previously comment on the preferred options stage of the document in April 2007, which I have attached for your reference.

Waste

The Changes to the Preferred Options Core Strategy complies with Policy EM13 of the Submitted Draft RSS, which states that plans and strategies should identify locations for waste management facilities up until 2020. The previous document 'Preferred Options Core Strategy' set out plans and strategies up to 2018, a date which the Assembly's previous response queried.

In October 2007, the North West Regional Assembly published a commissioned report entitled Identification of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities in the North West⁴. The Changes to the Preferred Options Core Strategy Policy 7: Strategic Areas for New Developments and the Key Diagram identify strategic locations for municipal waste management facilities, which are concurrent with those mapped in the broad locations commissioned report (Map 405). They are also located broadly in accordance with those areas as identified in Table 7.1 of the Submitted Draft RSS. We would point out that the commissioned research project has been undertaken to provide part of the evidence base for use by the NWRA and others on the review of regional waste management policy for the North West. Its content, including its spatial findings and conclusions, is based purely on the evidence assembled for the project, and does not have any policy status. However it will provide input into the proposed Partial Review of RSS due to commence in 2008.

The Changes to the Preferred Options Core Strategy Policy 8: Provision for Waste states that the plan will seek to make provisions for all of Cumbria's waste (net self-sufficiency). This policy is in broad accordance with adopted RSS policy EQ4 and Submitted Draft RSS policies EM10 & EM12 that encourage the processing of waste in as close proximity as possible to where it is produced and a move towards regional and sub-regional self-sufficiency in dealing with waste arising.

The Changes to the Preferred Options Core Strategy Policy 10: Waste Hierarchy states that sufficient sites will be identified to enable wastes that remain, after waste reduction measures, to be managed as high as possible up the hierarchy. This is broadly in accordance with Submitted Draft RSS policy EM11 which sets out the waste hierarchy with waste minimisation as the prime option for dealing with waste arising. However it is not clear that policy 10 covers intermediate treatment of wastes that cannot readily be composted or recycled (through anaerobic digestion or mechanical biological treatment), or the production of refuse derived fuels from waste.

The Changes to the Preferred Options Core Strategy Policy 11: Reducing Landfill complies in principal with Policy EM10 of the Submitted Draft RSS

⁴ Identification of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities in the North West (October 2007) NWRA/Jacobs - http://www.nwra.gov.uk/whatwedo/?page_id=129

which states that plans and strategies will incorporate provisions to deliver the principles set out in the Waste Strategy for England and PPS10; and the objectives and targets of the Regional Waste Strategy. Further clarification is needed over the inclusion of the term 're-use' in the household waste category targets. Waste Strategy for England 2007 and the Regional Waste Strategy 2004 set targets for recycling and composting, without the inclusion of the term re-use. Within the waste hierarchy set out in the Waste Strategy for England 2007 re-use is placed further up the hierarchy than recycling and composting and as such actions to re-use waste should be taken before recycling or composting.

The Changes to the Preferred Core Strategy Policy 12: Waste Sites indicates that the plan should seek to provide an additional 2 million cubic metres of landfill capacity in addition to the void space remaining in existing permitted sites. The Regional Waste Strategy (Table 1) indicates a residual landfill capacity requirement of 2.5 million cubic metres; clarification would be helpful on the reasoning behind the difference.

Minerals

I would agree with the proposed approach in paragraph 7.13 of the document that the Regional Aggregates Working Party (RAWP) is the most appropriate route for the consideration of aggregate figures. The Submitted Draft RSS is now at such a stage in its progression towards adoption, to address this issue would not be practical. I would also point out that the issue of aggregate figures was not one considered by the Panel at the EiP and there are no plans to include minerals as one of the topic areas in the proposed Partial Review of RSS.

I welcome the approach taken to Alternative Minerals (secondary aggregates) within the document. Submitted Draft RSS policy EM7 specifically mentions the need for plans and strategies to consider their contribution.

The Changes to the Preferred Options Core Strategy Policy 17: Supply of Minerals, are supported. This policy seeks to ensure that the Submitted Draft RSS apportionment for sand, gravel and crushed rock are met and recognises the importance of Gypsum.

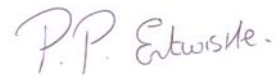
I particularly welcome and support the inclusion of paragraphs 7.54 to 7.56 and the new Core Strategy Policy 21: Building Stones, in response to the Assembly's previous concerns that the identification and protection of sources of certain types of building stone used in the repair and maintenance of the regions historic and character buildings had not been addressed by any of the options in the document, and therefore was not fully in accordance with Submitted Draft RSS policy EM7. The proposed Core Strategy Policy 21: Building Stones will go some way in addressing the Assembly's concerns.

Finally, I would offer the Assembly's further support in the approach that the document takes towards the inclusion of peat as a mineral resource. As the document points out, the EiP into the Submitted Draft RSS considered the

inclusion of peat as a mineral resource in policy EM7 after a number of objections where received. The EiP Report of the Panel concludes that the addition of peat within the policy as a mineral resource is consistent with National Policy.

I hope this is of assistance. If you require anything more then please contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "P.P. Entwistle". The signature is written in a cursive style with a small dash at the end.

Paul Entwistle
Regional Planning Officer