

## CUMBRIA MINERALS & WASTE DEVELOPMENT FRAMEWORK

### EXAMINATION OF MINERALS & WASTE CORE STRATEGY & GENERIC DEVELOPMENT CONTROL POLICIES

#### **Submission by the QPA under Matter 5: “Minerals Core Strategy and Delivering the Minerals Strategy”**

- (i)b. It is not clear how the “average annual sales” figure (Policy CS13 (CSD1), third bullet point) which will be used as the basis for allocating new areas for sand and gravel extraction, will be calculated. If this figure is too low it may not make adequate provision to accommodate lead in times, particularly if current difficulties with the Site Allocations Policies document are not resolved in a timely manner and the document is delayed.

As drafted it fails tests viii and ix and renders the Core Strategy unsound.

- (ii)a. MPS1 (ND11) Para.13 requires Mineral Safeguarding Areas (MSAs) to be defined as part of the process of ensuring that mineral resources that are or may become of economic importance in the foreseeable future are not needlessly sterilised by other forms of development.

It is not clear from Policy CS14 (CSD1) what methodology Cumbria CC will employ to define MSAs, as some judgement will presumably need to be made about the potential economic importance of the minerals in addition to the geological information mentioned in 10.46.

Therefore as drafted CS14 fails test viii and is unsound.

- (ii)e. Policy CS14 is not consistent with national policy as it does not include a clear mechanism to show how the MSAs described will meet the needs of Para.13 of MPS1 (ND11).

DC9 (CSD3) is not soundly based as it only deals with Mineral Consultation Areas and does not show how MSAs will be used to ensure that the requirements of Para.13 of MPS1 (ND11) will be met.

As there is no effective mechanism in the Core Strategy or the DC Policies document to meet the requirements of MPS1 (ND11), those

documents are unsound by virtue of the fact that they fail tests iv and viii.

“A Guide to Mineral Safeguarding” (BGS 2007) includes an example of a Core Strategy policy, a DC Policy and accompanying text that could be adapted to meet the needs of Cumbria and make the documents sound.

- (iii)a. There is nothing in CS13 or in the accompanying text that shows that assessment of future aggregates provision has been given appropriate consideration. Whilst the matter of high specification aggregate has been considered, the maintenance of a dispersed pattern of sources of supply for other aggregates is particularly important in view of the need to reduce “minerals miles” as mentioned in Para.10.20 of the Core Strategy (CSD1). This is a matter of strategic importance and the adequacy of key sites should be considered in the Core Strategy, not left until the Site Allocations document.