

## DRAFT CUMBRIA MINERALS AND WASTE LOCAL PLAN

2015 to 2030

### PROPOSED MAIN MODIFICATIONS TO THE PUBLICATION (REGULATION 19) PLAN POST HEARING SESSIONS

Ref No.	Page No	Paragraph/ Policy/Figure/ Table/Map/Box	Proposed Main Modification	MPA Observations
MM31	63	Paragraph 5.65 and following new paragraph	<p>Insert new paragraph 5.66, to read:</p> <p>“The broad estimate of the permitted reserves of industrial limestone, outside the National Park, is 1.85 million tonnes with all the quarries <b>currently</b> having an end date of 2042. Looking at sales for these four quarries, based on current sales levels, the 1.85 million tonnes could last around 140 years; based on both 3-year and 5-year rolling averages, it could last around 120 years. It is not considered that their scale of production warrants a Preferred Area or an Area of Search for industrial minerals alone, <b>although this position may need to be reviewed during the period of the plan</b>. All these quarries are located within the general limestone Mineral Safeguarding Area and, therefore, the Mineral Consultation Area. Policy SP10 aims to maintain a steady and adequate supply of industrial limestone throughout the Plan period, to reflect current national policy.”</p>	<p>We <b>SUPPORT</b> the proposed amendments subject to a couple of minor additions to the text.</p> <p>Insert the word <b>“currently”</b>. There is clearly scope to renew these consents.</p> <p>The position regarding Industrial limestone may change during the plan period.</p>

MM43	119	Policy DC4 Quarry blasting	<b>DELETE POLICY. IT DOES NOT FOLLOW RECOGNISED GUIDANCE.</b>	<b>OBJECT:</b> - As worded, the proposed modification <b>does not</b> address the debate or provide the flexibility discussed at the EiP. The policy does not accord with guidance. If the changes we suggested are not taken on board, then this Policy should be deleted as it is a development management matter
MM59	143, 144	Policy DC17 Historic environment	<p>Development proposals that have an impact on any heritage asset or its setting (including where there is potential for unknown archaeological assets), whether designated or not, should be accompanied by an assessment of the significance of the heritage asset and its setting, and how that significance will be affected by the proposed development.</p> <p>The level of information required will be proportionate to the significance of the asset and to the scale of impact of the proposal, and may require, where necessary, an archaeological desk based assessment and field investigation. The recording of the loss of, or harm to, any heritage assets (where justified), and any supporting information, will need to be made publicly accessible in the County's Historic Environment Record.</p> <p>Any proposals that would result in harm to, or total loss of, the significance of a designated heritage asset or its setting (or a non-designated heritage asset of national significance, or its setting) or the Outstanding Universal Value of a World Heritage Site, will only be permitted where it can be demonstrated that public benefits outweigh the harm, and that the harm is necessary to achieve those public benefits.</p> <p>Any proposals that affect a non-designated heritage asset or its setting will be judged on the significance of the heritage asset, the scale of the harm and the public benefits of the proposal.</p>	<p>This Policy is far too wordy and in many respects back to front. Proportionality of any assessment should be at the front and this will then guide the determination of any proposals and the level of any investigations, and where necessary, conservation and enhancement. A core principle of the NPPF is the conservation of heritage assets in a manner <b>appropriate</b> to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. The revised policy goes beyond NPPF.</p> <p>Much of what is proposed in the policy is reflected in Historic England Guidance and does not need repeating.</p>