

**Statement on Matter 2 – Waste Strategy
Cumbria County Council's Minerals and Waste Management Plan
by F B Thompson**

Issue: Do the strategic waste policies provide sufficient opportunities for an appropriate level of sustainable waste management facilities to operate in suitable locations throughout the County?

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20. The preferred scenarios which have been followed through to the MWLP have spurious accuracy, are they not sufficiently objective and robust and have rejected ED5 out of hand (see Appendix 7).

If the initial demand predictions were correct the sudden loss of a preferred site makes little sense. ED 1 Blencowe Quarry, near Penrith initially a First Preference but reserve site :- has suddenly been transformed to a First Preference limestone quarry. One must ask why the predicted demand has gone and the new demand arisen.

Thus the Plan is unsound as it is not positively prepared and fails to meet objectively assessed development requirements. Its scoring in the Scoring Matrices is incorrect and only partially completed in some cases. (See Appendices 1, 2, 3, 4, 5, 6) 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.

- Justified – the plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; The comparison matrix is illogical and subjective. (see Appendices 1 to 6) It fails as uses incorrect data for site ED5 and at best incorrect data for adjacent sites ED1, ED2, and ED31The Plan can be made sound by including site ED5 as a site for waste processing, building stone and mineral search area (see Appendix 7).
- The plan is not positively prepared is based on a 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 may not enable the delivery of sustainable development in accordance with the policies in the Framework.
- It fails as the Council has failed to disprove my contention that site ED5 is suitable as a waste treatment site (see Appendix 7 and Appendices 1 to 6)
- The Plan can be made sound in this respect by including ED5 as a potential site for waste treatment.