

## Gloucestershire Minerals Local Plan

### Examination Statement by Forest of Dean District Council

#### **Main Matter 5 Whether the Plan makes adequate provision for the steady and adequate supply of aggregate minerals.**

*32. Should 'Allocation 01: Land to the east of Stowe Hill Quarry' be retained as an allocated site within the Plan? If not, what effect would this have on future supply requirements?*

Stowe Hill allocation 01. (July 2018 representation, 852145/12/MA01/USND)

1. The FoDDC submitted representations to the published MLP which objected to the allocation at Stowe Hill. It also made representations about the degree of headroom between the required supply of aggregate from sources of crushed rock and the apparent supply which the planned allocations could serve. The representations in relation to Stowe Hill were in the form of objections but it was not considered essential to delete the entire allocation. The main concerns were the need to resolve the SSSI based objections and the way in which any development could be accommodated in the landscape. The deletion of the entire allocation would however have resolved the objections to the site and for this reason the proposal to delete it is supported as set out below.
2. The representations made to the published plan by FoDDC (852145/11/MA01/USND and 852145/12/MA01/USND) sought the reduction of the scale of the allocation at Stowe Hill, the identification of strategic landscaping areas on a plan in order to protect the locality and also assurances that the allocation was able to be realised in the light of the effect or possible effect on the nearby SSSI (Slad Brook). One consequence of the setting aside of an area for landscaping would be a reduction in the area available for extraction and hence the amount of material likely to be available. It was not at the time of the representation considered possible to predict if the safeguarding of the SSSI would require a reduction or removal of the allocation.
3. The MPA now propose to delete the allocation in its entirety as the previously uncertain issues in relation to the potential impact of its implementation on Slad Brook SSSI have not been resolved. Objections from the EA NE and others therefore remain. As a result both the NE and EA statements of common ground submitted to the examination require the deletion of the allocation. FoDDC support the deletion of the proposed allocation, noting the GCC supplementary material (Addendum to the supporting evidence paper of December 2018) and the calculations that show how an adequate supply can be maintained. The margins are much reduced in the revised supply calculations but are considered by the MPA to be adequate when assessed against the criteria used in the published MLP. Alternative assessments and especially those that suggest an increase in demand for minerals would erode or remove any margin. Likewise any shortfalls in delivery from the two remaining sites (Drybrook and Stowfield) could quickly result in an MLP that would not be able to deliver the FoDD element of crushed rock. Should there be a shortfall or in the event that the Inspector considers additional provision is necessary, the FoDDC preference would be

for the minimum additional reserve to be found from the existing sites originally proposed to be allocated in the MLP. It will also be appropriate to take full account of the contribution from secondary and recycled materials.

4. In the event that a full or partial reinstatement of the proposed allocation at Stowe Hill is recommended, it is the FoDDC view that the allocation should include strategic landscaping the area(s) for which should be identified on the policies map.
5. Although the circumstances have changed in relation to this submission the FoDDC would still welcome the opportunity to attend the Examination in order to assist the Inspector.

EA Environment agency

FoDDC Forest of Dean District Council,

FoDD Forest of Dean District

GCC Gloucestershire County Council

MLP Minerals Local Plan

MPA Mineral Planning Authority

NE Natural England

SSSI Site of Special Scientific Interest

Nigel Gibbons Forest of Dean District Council 9 May 2019