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Hafren House,
Welshpool Road
Shrewsbury
Shropshire
SY3 8BB



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms. Wilson,

This is a joint statement on behalf of Natural England and the Environment Agency.

We provide this letter in response to material submitted by Breedon Aggregates and Gloucestershire County Council, in response to the Inspector's questions, as part of the Minerals Local Plan (MLP) Examination. The information highlighted below is to be taken as our current formal position regarding potential allocations at Stowe Hill Quarry. Our information centres solely on environmental impacts that may occur as a result of the allocation.

As previously stated, as part of our formal Local Plan submission, we (Natural England and the Environment Agency) have raised written representations which consider that the Minerals Local Plan does not meet the current tests of soundness as it is not justified or effective and is not consistent with national policy with regard to its allocation at Stowe Hill Quarry. The proposed allocation MA01 could lead to significant adverse impacts on Slade Brook Site of Special Scientific Interest (SSSI), and therefore cannot be considered to be sustainable development.

Slade Brook SSSI is designated for its actively-forming tufa dams, which are formed by water percolating through the limestone, absorbing calcium on its way through the rock and then depositing it in the brook; this complex process relies on a balance of hydrological, chemical and geological factors. We have raised specific concerns around the effectiveness of monitoring as an early warning system and site restoration to ensure the long-term functioning of the SSSI, which are technically difficult to overcome and which require further thought before the proposed extension could be permitted. We believe this calls the viability of the plan into question.

Natural England has outstanding objections to two planning applications for extensions on this site. The Environment Agency have raised similar concerns. In our objections, we have raised concerns around the ability of monitoring to adequately protect the SSSI, and the ability of site restoration to ensure the long-term functioning of the SSSI. Overcoming our concerns may be technically difficult, and could jeopardise the viability of the proposed extension. As it stands, this proposed extension has the potential to lead to significant adverse impacts on Slade Brook SSSI. We therefore conclude that with the inclusion of MA01 in the Minerals Plan, the plan is not justified, effective or consistent with national policy, and is therefore not sound.

Current position

There is still an element of doubt regarding the proposed extensions and our position regarding this has not changed since submitting our formal Local Plan responses. It is felt that until further evidence is submitted, we are unable to resolve concerns with Breedon Aggregates and Gloucestershire County Council, and be able to reasonably consider any alternative plans that have been proposed for the larger extension area (MA01), including the reduced area being proposed by Breedon as part of their submission. In the absence of technical information, we would question the ability to demonstrate that the principle of the land use for the allocation (a 'specific site') is acceptable and/or the proposal is likely to be acceptable in planning terms. On this basis, such an allocation could be deemed as premature.

Therefore, we feel unable to change our position regarding the deliverability of future proposals for the extension of Stowe Hill Quarry. Without this further evidence, we still consider the Plan to be unsound with the inclusion of Allocation 1, including any reduced parts within that area

As part of the proposal for planning application 17/0122/FDMAJM, for the smaller extension, whilst we have sought information as part of the Environmental Impact Assessment, monitoring of the epikarst recreation (restoration) scheme is being put forward by the applicant to be agreed through planning conditions. Uncertainty does still remain regarding the epikarst recreation scheme mitigation, as at this stage it is still untested mitigation and the efficacy is unknown. Therefore concerns remain over the potential impacts that this current and any future applications may cause on Slade Brook SSSI. We have sought through pragmatic discussion with the developer and the Council a solution to see how development might commence to allow extraction to continue.

One option might be for the land to be included as a Safeguarded area, but this would be for the Mineral Planning Authority to consider. The existing proposal (17/0122/FDMAJM) for the smaller extension is looking to trial the currently untested epikarst recreation scheme, resulting in monitoring and data collection. This will help form an evidence base, which can be used to inform future quarrying proposals.

I trust that the above is of assistance, read in conjunction with our previous written representations, to assist your decision making process as part of your consideration of the MLP.

Yours sincerely

Rebecca Underdown
Planning Lead Adviser
Natural England, West Midlands Planning for a Better Environment Team

Mark Davies
Planning Specialist
Environment Agency West Midlands, Sustainable Places Team