

## **FURTHER REPRESENTATIONS BY CPRE GLOUCESTERSHIRE FOR THE EXAMINATION OF THE GLOUCESTERSHIRE MINERALS LOCAL PLAN**

### ***Main matter 1 – Duty to Co-operate***

1. As our representations submitted on 9 July 2018 indicate, it is with reference to the supply of Carboniferous limestone that we expected the Duty to Co-operate (DtC) to have a substantial, quantifiable influence on the Gloucestershire Minerals Local Plan (GMLP). This view was based on the geographical relationship between, in particular, Gloucestershire and South Gloucestershire Unitary Authority (SGUA), our understanding of the relative landbanks and productive capacity of the two mineral planning authorities (MPAs) and the recognition prior to the dissolution of the South West Regional Authority that this should be a key element in the then current sub-regional apportionment process.
2. Since the public consultation on the Pre-submission MLP in May 2018 the position *vis a vis* Gloucestershire and the West of England (WoE) group of unitary authorities has changed from a draft Statement of Common Ground to a draft Memorandum of Understanding (MoU). The apparently greater attention given to the DtC in 2018 is welcome and a marked improvement on the situation as evidenced in the 2014 and 2016 public consultations. However, there is no record of a systematic exercise to determine whether or how Carboniferous limestone from permitted reserves in South Gloucestershire could formally contribute to Gloucestershire's demand. If detailed analyses and quantification assessments have been made they have not been provided in the public consultation documents.
3. SGUA's Policies, Sites and Places Plan (adopted Nov 2017) covers mineral working under policy PSP23. It indicates (para 6.78) that the existing landbank 2 years ago was in the order of 70 million tonnes plus 'considerable reserves' in the inactive Cromhall Quarry ie. without any new permissions in the identified preferred areas for further working at Tytherington, Chipping Sodbury and Wickwar or the Area of Search NW of Wickwar. Based on SGUA's apportionment of WoE production (60%, with the other 40% apportioned to North Somerset UA) and on the 2015 Local Aggregate Assessment (LAA) for the WoE (para 6.77) that indicates a landbank of c. 32 years, exclusive of Cromhall reserves (70 divided by 2.14).
4. SGUA decided not to use the LAA data, but to plan on an annualised figure of 3.05mt, derived from its share of production as indicated by the 2009 National and Regional Aggregate Guidelines and as adopted in the 2013 Core Strategy. On that basis the landbank in 2017 would be c.23 years, again excluding the Cromhall permitted reserves and any new permissions. Whether using the higher figure rather than the (then) latest LAA was appropriate is open to question, though CPRE acknowledges that the SGUA's plan is not subject to this examination.
5. Given this situation and the apparently very limited scope for new working in the Forest of Dean we would have expected a more rigorous collaboration between the WoE and Gloucestershire to explore scope for 'apportionment' to supply the needs of the constituent MPAs at the least additional environmental cost. The DtC was implemented in 2012 and it seems unreasonable that it has taken 6 years to get to a draft MoU which is essentially a confirmation of good intentions for the future. Whether or not the DtC is deemed to have been adequate up to now the issue regarding the extension of Stowe Hill Quarry indicates the need to step up implementation of the DtC to try to achieve a practical benefit.

6. In summary, with reference to the Inspector's Guidance Note, CPRE considers that the submitted MLP is not justified, effective or consistent with national policy as it does not, on the evidence provided, indicate sufficiently rigorous application of the Duty to Co-operate. In the case of the supply of Carboniferous limestone such application could reasonably be expected to result in a more 'sustainable' policy.
7. CPRE's further representations concerning Allocation 01 are made under Main Matter 5