

Further responses to the Minerals Local Plan for Gloucestershire 2018 – 2032

Prepared by

Temple Guiting Parish Council



Figure 1.1 Location of quarries local to Temple Guiting Parish

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1. Introduction

Temple Guiting Parish Council, located in the North Cotswolds, is uniquely placed to respond to the Minerals Local Plan for the county as it is surrounded by five active quarries: the four mentioned in Pt. 2 below, plus Tinkers Barn Quarry (close to Barton). There is a further site in Guiting Power which operates in a similar way to a quarry but only has planning permission to excavate for and build a farm storage building. In addition, a further quarry is being prepared for re-opening (Ref. **99/5003/TWROMP**). A scoping opinion for a new quarry above Temple Guiting village, opposite Oathill quarry, (Ref. **17/0087**) was requested in September 2017. See Figure 1.1 above for a satellite view of the location of these quarries.

As a result, the Council regularly receives complaints and enquiries from parishioners regarding the issues surrounding quarrying including speeding HGV quarry vehicles, HGV vehicles in excess of the permitted number, HGV vehicles operating outside permitted hours, noise from quarries (both within and outside permitted operating hours), HGV vehicles using roads inappropriate for large vehicles, dangerous mud on the road, erosion of verges, and litter from HGV drivers, among others. The resulting loss of the unique landscape and tranquility of the Cotswolds is clearly causing distress among residents, as evidenced by communications from parishioners. This is contrary to the objectives of the AONB and the statements contained in the 'Vision' document of the Minerals Plan.

2. Quarrying applications

The Council has always responded to quarry planning applications in its locality. Most recently the Council has responded to three applications (see below) from local quarries, all of which were applying for permission to extend and/or increase activities:

- **Naunton Quarry:** Proposed extension to South (Ref **18/0065/CWMAJM**)
- **Oathill Quarry:** Change to conditions (Ref **18/0010/CWMAJM**)
- **Cotswold Hill Quarry:** Request to remove conditions (Ref **APPT/T1600/W18/3207814**)

Temple Guiting Parish Council's experience in responding to these and other planning applications enables the Council to highlight the major issues and impacts faced by the community due to current quarrying activities and the current planning, monitoring and enforcement system. It also enables Temple Guiting Parish Council to identify elements of the Minerals Plan and the associated Sustainability Report and their possible impact on the Cotswold landscape, the community and the local economy.

Regarding a further planning application:

- **Grange Hill Quarry:** Proposed extension to North (Ref 18/0074/CWMAJM)

The Council did not comment on the application for an extension to Grange Hill Quarry as it is outside the Parish. However, the points observed when we reviewed these proposals were similar to those observed at Naunton Quarry and support the wider observations seen in the Minerals Plan re standards of restoration, monitoring and HGV traffic among other issues.

TGPC continues to have an open and practical dialogue with the GCC Minerals Team relating to compliance issues and is appreciative of their knowledge and experience.

3. Observations relating to the above applications

3.1 Cumulative Impact and duration of works

- Local quarries both in Temple Guiting and its neighbouring Parishes have a cumulative impact on the peace and tranquility of the area through quarrying activities, the HGVs used

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to transport materials and the loss of natural landscape. However, planning applications are dealt with on a case-by-case basis. So for example, if the traffic from one quarry is deemed to be acceptable, the fact that that traffic is adding to an existing load of traffic from four other quarries is not taken into account.

- In almost all cases it is expected that the proposed works will continue for a period of 20-30 years, during which time further extensions of time could be requested.
- As the resource reduces over time, quarries can be expected to propose extending their area of operation. For example, both Cotswold Stone and Naunton quarries have recently applied for extensions to the area quarried.
- In all cases the premise for the work has generally been a continuation of existing practices. In the period since these practices were established, there has been considerable progress in 'best practices'. However, no quarry has proposed any adoption of best practices or shown any plans to improve their approach to environmental impact, a not unreasonable expectation for a requirement for works in the AONBs over these timeframes.
- These issues need to be addressed sooner rather than later as it appears from the 6th LAA (Pt 5.9) that the presence of 'site specific restrictions' could 'reduce the prospect (that supplies) will be sufficient to keep pace with projected demand for many more years'. We are already seeing applications to remove restrictions. If these and other restrictions are removed and total volumes of traffic and materials increase, whether permitted or not, current concerns will be magnified significantly.

3.2 Highways

- The recent comments presented by the Cotswold Conservation Board (CCB) relating to Cotswold Hill Quarry planning application noted that the increase in HGV movements since the tranquility survey carried out by CPRE in 2008 had eroded the peace and tranquility of the area through the large number of HGV movements in the vicinity.
- Recently, TGPC received information from Ford, Barton and Guiting Power regarding significant increases in HGV movements. Residents in Ford provided a detailed log of data collected on Thursday 30 April 2019 between the hours of 6.30 am and 7.54 am. The records showed that 27 HGVs associated with quarrying operations passed through the village.
- None of the recent applications have included traffic survey information to show the volume of traffic currently generated by quarries in the area. There is therefore no basis to show that levels can be increased or whether they should be restricted to preserve or improve the environment. There is also no historic information to show the changing volumes. In some cases, quarries have been reluctant to provide such information and, when it has been provided, data has been missing. Two quarries are known to have exceeded the permitted vehicle movements.
- In all cases the data presented relates to capacity of the road network rather than the environmental and human impact. The cumulative effect of all operations in the area has not been presented.

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3.3 Reinstatement plans

- In general, reinstatements or restorations of the land have been less than sympathetic to the local landscape. For example, restoration of land exhausted by Tinkers Barn quarry is extremely flat and other proposals have included straight line escarpments (similar to a straight railway embankment) and exposed rock faces. Reinstatement needs to reflect gently rolling hills and valleys covered in vegetation which encourages bio-diversity.
- The Minerals Plan refers frequently to a 'high standard of reinstatement' but this is not defined.
- Instead of using the term 'high standard' it would be preferable to refer to reinstatement in AONBs being required to use 'best practices'. This would also make the required standard of restoration 'timeless'. Discussions with experts on suitable best practices would involve CPRE, Natural England CCB and others as appropriate. For example, woodland pastures or traditional meadows such as described by CCB could be considered.
- Bunding, put in place to initially screen the works, becomes established over time as a habitat. The ability to remove bunding and to restore open vistas, a key attribute of the Cotswold landscape, is therefore questionable.
- We have also not seen reinstatement plans that have been intentionally designed to create a space for public access, even though the applications have in some cases specifically stated that the geological formations were being left unrestored for geological purposes.

4. Previously submitted comments

The comments made by TGPC in July 2018 remain valid. Recent applications confirm their importance, and the need to:

- address the cumulative impact of all the quarries in our area
- understand and reduce the impact of HGVs across the area
- establish clear guidelines for reinstatement best practices
- effectively manage and enforce conditions.

5. Additional comments and observations

- Of the quarries in the TGPC locality, the Minerals Plan only includes Naunton quarry. This ignores the other four currently active, one proposed to reopen, and one which was in the early stages of consideration.
- Any references in the Minerals Plan to taking a holistic approach in future would therefore have no impact on the Temple Guiting area, as only one quarry is currently being considered. It is difficult to see how the associated cumulative impact of the operations in this sensitive environment will be assessed and managed.
- The Minerals plan only includes data for aggregate/crushed rock in our area. Yet the planning applications for residential and farm buildings regularly state that local stone and local vernacular must be used. E.g. Cotswold stone tiles in conservation areas. The provision of stone for this purpose, one which is an essential part of the definition of the Cotswold landscape, is not considered and there is no data for expected local need in the document.
- The fundamental premise on which the Minerals Plan is based i.e. that of the 'need' of the county, has been calculated from the sales data of existing quarries. The resulting 1.452

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mtpa 'need' is the amount needed for the quarries to sell the same amount p.a. The real need would be determined from expected and planned building works requiring Cotswold crushed stone but this approach was rejected in the LAA. The genuine local need for Cotswold stone is not included although clearly there is a need for Cotswold stone to maintain local characteristics. The plan needs to consider anticipated demand for all types of stone in the county.

- The Draft Minerals Plan acknowledges that over 1/3 of Gloucestershire falls within the Cotswolds AONB (p. 31) and the Cotswold AONB Management Plan is referenced regarding the special qualities and landscape. The Plan would benefit from the inclusion of a section that provides guidance on the Plan status relative to other planning policies, legislation and Management Plans of AONBs. It would help if this also clarified how it will apply to existing operations and licences. Additionally the guidance should cover sites that involve large groundworks thereby addressing a potential gap between Local and County Council responsibilities.
- The proposed Plan repeats the NPPF S.13 para 144 bullet 2 statement that **'as far as is practical providing for the landbanks of non-energy minerals ... should be from outside of ... AONBs etc'** (p.84) several times. However, **it is far from clear how this will be achieved** when the Plan also states that the Cotswold AONB is seen as a strategic source to supply 30% of the total production of aggregate in Gloucestershire – i.e. a further 3.016 million tonnes of crushed stone (p.160). Naunton quarry, the preferred site and No. 5 of seven 'allocations', is within the AONB, as are the other quarries around the parish.
- The Vision Statement (p.79) refers to reinstatement of a 'high environmental standard' but this has not been defined. Recognising the significance of the AONBs, a change in the wording to a set of **'best practices'**, which would then be clearly defined would help make the policy timeless and give quarry operators clear objectives. They would then need to demonstrate how their proposals would deliver best practices (which will change and develop over time). In parallel with the Minerals Plan, it would be useful to **develop Guidance on Best Practice** so that the benchmarks are clear to all those involved or affected by the proposals and monitoring would have clear benchmarks. The guidance document could also include day to day operations as well as longer term objectives.
- Licences to operate should not be granted in perpetuity (i.e. 20 - 30 years) to allow regular reviews of performance against clearly defined best practices in quarrying, transport and restoration. Quarry owners need security for longer term investment, and these reviews will help to ensure sustainable operations.
- Quarry working hours need to clearly recognise the impact of HGVs travelling to and from the sites and their effects on the local population and wildlife. For example, several of the recent quarry lorry movements recorded in Ford were before the permitted start of licensed operating hours. The current permission for the Guiting Quarry, which is preparing for re-opening, allows 6 ½ day operations and was set in 1999. No other local quarries have permitted hours of operation of the same length.
- Accurate data is needed on historic current and planned HGV movements. Environmental Impact Assessments (EIAs) should address not just the works on site but the cumulative impact operations will have along access routes. In the absence of any data on existing traffic flows it is essential that detailed assessments are carried out across **all** of the quarries in an affected area and agreed traffic volumes and measures are established for future monitoring and for use when considering new applications.

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6. Comments on the Sustainability Report

- The sustainability appraisal objectives are admirable but they are not supported by concrete plans, base data, actual and relevant measurable targets or best practice standards to be applied to the quarries.

Key measures of success for the Plan in almost all cases are set by the conditions applied to applications. This is a very narrow approach which excludes many of the potential positive outcomes anticipated by the plan, as stated in the sustainability objectives. For example, how are the objectives of 'improved amenity' going to be measured? What actual field measurements will be used? In recent years there has been difficulty in enforcing conditions. Recent additional resourcing dedicated to monitoring and enforcement is having an effect but is still not enough to handle the current status adequately. How will this change under the new plan?

- A review of tables presented in the report suggests that the effects of implementing the proposed Plan and policies will generally be positive for almost every aspect of the document. Given the extent of works that will be carried out in the AONB it is not clear what baseline has been used when carrying out these assessments. Many of the charts' results have question marks assigned to them i.e. the outcome is unknown.
- If the same statements were to be read with reference to the special qualities of the AONB the risks presented could potentially be much higher than estimated, requiring additional provisions and measures. Based on the interpretation and implementation sections for Policies such as DM02 (ref 293- 296) there is a need to establish clear baselines from which to assess the overall impact and plan for the future.
- In addition, this apparent all-round positive result would appear to be contradicted or at least given severe caveats by the following clause, which is used frequently throughout the document:

'Restoration... is increasingly adopting innovative practices and this could have positive effects on landscape character. However, this would be very dependent on the exact nature an proposed design of the restoration of the minerals site, which would not be known until the planning application stage.'

This demonstrates that no conditions or best practice are currently designated as mandatory for quarry restoration in the region and the estimate of a positive outcome is not based on any enforceable behaviours.

7. Quarries outside the Minerals Plan

Most of the quarries around Temple Guiting Parish are not included in the MLP. The consequences for Gloucestershire if the MLP is not adopted are described in very negative terms in several places, for example:

'In the absence of the MLP and appropriate policies, there may be negative impacts on populations and communities' (p.20), and:

'Plans contain policies which aim to protect and enhance the environment. Without these plans the environment would be damaged by un-planned development and the opportunity to enhance the environment and protect and improve environmental networks would be severely limited.' Biodiversity, p.19)

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However, the quarries around Temple Guiting will be in the position of not having the anticipated 'protection' of the Minerals Plan.

Policy DM02 says that *'the Council will have regard to ... the cumulative effects'*. However, even if this was enforced, the benefits would not apply to the parish as the majority of quarries in the area are outside the plan.

8. Monitoring

The section on monitoring in the Sustainability report does not provide any details of what will be measured or how monitoring will be resourced. It is known that GCC has only recently provided dedicated monitoring and enforcement resources and these are still not enough to handle the current status adequately.

9. Employment

No figures for the number of jobs in the quarrying industry which are held by local residents have been found in the documentation. Similarly, no metrics for monitoring future job increases or losses among local people have been found.

10. Finding the right balance

- There is a need to manage and reduce the cumulative impact of multiple quarries in this part of the Cotswold AONB effectively, through inclusion in a very clearly defined and closely monitored Minerals Plan. If that is not possible, then a separate plan is needed to manage agreed standards of quarrying in the North Cotswolds.
- As a local Parish Council we fully recognise and support the need for mineral working to preserve and enhance the qualities of the local landscape here in the AONB, including the use of local stone in local buildings and walling. This aspect should be considered in the Plan.
- Given that the Cotswolds AONB represents a significant part of the area covered by the Minerals Plan, a separate assessment should be made of the impact of the Plan on the AONB.
- There is a need for additional measures to protect and preserve the specific character and landscape found within the Cotswold AONB. This should include a clear commitment to establishing and applying best practices for quarrying and to creating practical plans to reduce the environmental impacts throughout the life of the quarrying operations.
- A joint management committee is proposed and TGPC believes that local representative(s) would be a valuable addition to the committee.
- For successful implementation, clear baselines need to be established relating to traffic movements; quality of reinstatement proposals and successfully reinstated sites (compared to documented original conditions) as described in the 'Vision', all delivered according to best practices adopted by the County.