



Gloucestershire
COUNTY COUNCIL

Minerals Local Plan for Gloucestershire

2018 – 2032

Consultation Statement

to support the submission of the plan under Regulation 22

December 2018

Section 1 | Introduction

1. This consultation statement describes the processes followed by Gloucestershire County Council in undertaking community participation and stakeholder involvement during the production of the Minerals Local Plan for Gloucestershire (2018 – 2032) (hereafter referred to as the “MLP”). It sets out how the main issues raised through consultation have helped shape the plan.
2. This statement has been prepared to demonstrate compliance with the requirements of regulation 22 (1) part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to as “the Local Planning Regulations”)¹.
3. This is the final version of the consultation statement and follows on from an interim statement, which was prepared alongside the Publication MLP and made publicly available in May 2018. This statement supports the submission of the MLP. The change from the interim statement is the addition of information to demonstrate compliance with regulations 22 (1) part (c), clauses (v) and (vi).
4. Regulation 22 part (c) of the Local Planning Regulations directs the County Council to prepare a statement as part of the ‘Submission of documents and information to the Secretary of State’. The statement must set out:
 - i) Which bodies and persons were invited to make representations under regulation 18 (section 2);
 - ii) How those bodies were invited to make representations under regulation 18 (section 2);
 - iii) A summary of the main issues raised by the representations made pursuant to regulation 18 (section 3);
 - iv) How any representations made pursuant to regulation 18 have been taken into account (section 3);
 - v) If there are representations were made pursuant to regulation 20, the number made and a summary of the main issues raised in those representations (section 4); and
 - vi) If there are no representations were made pursuant to regulation 20; that no such representations were made (section 4).

¹ The relevant part of the The Town and Country Planning (Local Planning) (England) Regulations 2012 can be obtained at : - <http://www.legislation.gov.uk/uksi/2012/767/part/6/made>

5. The remaining sections of this statement provide the evidence of compliance with all of the clauses of regulation 22 (1) part (c).

Minerals policy preparation in Gloucestershire prior to April 2012

6. Early consultation linked to the preparation of the MLP took place before the current Local Planning Regulations came into force². During that time, the County Council sought to create a portfolio-style plan constructed of several individual planning policy documents covering minerals (and waste) matters – known as a (Minerals & Waste) Local Development Framework (LDF)³. From a minerals planning perspective, initial attention was placed on the production of a strategic-level, countywide Minerals Core Strategy (MCS) that would provide a suite of overarching policy principles to lay the foundations for additional local planning policy documents covering more detailed, local issues. This could include the allocations of sites for future mineral working and / or other thematic challenges relevant to minerals in Gloucestershire.
7. Significant reforms to the planning system have occurred since the County began preparing the MCS. A different legislative and regulatory regime was introduced from 2012 onwards and the County Council is now aiming to adopt a comprehensive local plan that will include both strategic and local mineral matters – the emerging MLP. Nevertheless, the consideration of representations made to the MCS has been integral to the preparation of the MLP. As a consequence this statement has included consultation activities and events that have taken place prior to the current Local Planning Regulations. They have been considered as part of the plan's evidence base.

²The Town and Country Planning (Local Planning) (England) Regulations 2012 came into force on 6th April 2012

³ A Local Development Framework (LDF) was the spatial planning strategy for an area introduced into England and Wales through the Planning and Compulsory Purchase Act 2004. Government policy set out in Planning Policy Statements 12 (PPS12) provided the detail for maintaining a framework, including what it should contain, within a given planning area – in most part the administrative boundaries of district and unitary councils and county councils for minerals and waste matters.

Section 2 | an analysis of stakeholder engagement during the preparation stage of the MLP

Who has been invited to make comments during the preparation of the MLP?

8. The County Council adopted a Statement of Community Involvement at the end of 2005 (hereafter referred to as “the SCI (2005)”) ⁴. It explained how communities and other stakeholders should be involved in the preparation of future planning policy-related documents for minerals (and waste) and the determination of planning applications. It also highlighted the types of potentially interested parties who should be actively engaged. The SCI (2005) and its subsequent replacement (hereafter referred to as “1st Review SCI (2013)”) have provided the local baseline for determining who should be notified of consultation activities and events related (initially) to the MCS and then the MLP. This is in addition to meeting the specific consultation requirements of Local Planning Regulations in force at the time ⁵.
9. The SCI (2005) presented specific and general consultation bodies deemed relevant to Gloucestershire and the future preparation of a minerals (and waste) policy documents. All of these bodies were contained on the County Council’s planning consultation database and subject to individual notifications of local policy consultation activities and events concerning the MCS and emerging MLP. The specific consultation bodies of the SCI (2005) included: - all central government departments; the Government Office for the South West (GOSW); a number of government agencies such as Environment Agency (EA), Highways Agency (HA), English Heritage (EH); the six District Councils within Gloucestershire and all neighbouring (English and Welsh) county, district and unitary councils that adjoin the county; all town and parish councils and meetings contained within Gloucestershire and those town and parish councils and meetings that adjoin the county boundary; the Welsh Assembly; the South West Regional Development Agency (SWRDA) and all neighbouring RDAs; the South West Strategic Health Authority; and telecoms, electricity and water utility providers with an interests in Gloucestershire. The SCI (2005) general consultation bodies incorporated a number of other agencies and organisations such as: - local amenity and environmental interest groups at the national, regional and local level; transport-related organisations; the Gloucestershire Police Constabulary; British Geological Survey (BGS); Crown Estates; operators and trade bodies representing the minerals and waste industries and other potential related-business activities; environmental and planning consultancies; business promoting bodies and economic development groups; telecoms and other potentially

⁴ The 1st Gloucestershire Statement of Community Involvement (SCI) was adopted 12th December 2005.

⁵ Regulation 25 (1) (a) and (b) of the Town and Country Planning (Local Development) (England) Regulations 2004 established the consultation requirements for early local plan preparation under the Planning and Compulsory Purchase Act 2004 from 2004 until it was replaced in June 2008 by the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. The 2008 Regulations were eventually replaced in 2012 by the Town and Country Planning (Local Planning) (England) Regulations 2012.

relevant infrastructure providers; organisations promoting equality and diversity and / or representing different parts of the community including a number of charities; religious representatives; locally-based education establishments; and sporting and recreation promoting organisations

10. In addition, the SCI (2005) set out key community target groups for future engagement. Whilst not creating a detailed and exhaustive list, it identified in general terms, the types of community organisations that should be encouraged to get involved, beyond the specific and general consultation bodies already highlighted. They included: - local interest and action groups; developers; individual residents of Gloucestershire and those in neighbouring areas within the sphere of influence of development within the county; landowners; representative residents associations and groups and also local businesses. All consultation activities and events have actively sought representations from the wider community and individual members of the public. Unless a specific request has been made to disengage from the preparation of the MCS or emerging MLP, all local community participants and members of the public who have expressed an interest in being involved, and / or made representations have been recorded on the County Council's planning consultation database and routinely notified of subsequent consultations.
11. Reforms to local government and the planning system proposed by the Coalition Conservative-Liberal Democrat Government of 2010 to 2015 have impacted on the organisations and bodies that the County Council has sought to engage with during the preparation of the emerging MLP. Most notably a number of government departments and agencies have closed, merged or been re-organised, and the entire regional government infrastructure has been abolished. New organisations such as Local Enterprise Partnerships (LEPs) have also been set up leading to additional consultation-related requirements being introduced. The 'duty to cooperate' (DtC) requirements, in particular, have expanded the scope of potentially interested bodies for the MLP.
12. The 1st Review SCI (2013) has captured the Coalition Government reforms, which came into force during 2012. These include the setting out an updated list of specific and general consultation bodies and a commitment to ensuring future policy consultation activities and events will include a number of additional invitations to make representations. Consultations concerning the emerging MLP carried out since the adoption of the 1st Review SCI (2013), has routinely invited comments from the Gloucestershire LEP (GFirst LEP) and all other LEPs that share a border with it and the Gloucestershire Local Nature Partnership (GLNP). DtC requirements have also resulted in a number of other local authorities being made regular consultees. This is made up of those authorities that are situated beyond Gloucestershire's neighbouring

councils, but where a shared strategic minerals-related planning matter with Gloucestershire has been identified⁶.

13. In 2014 the County Council consulted upon possible site options for future mineral working. The introduction of very-localised issues in this way, resulted in the County Council extending its previous notification procedures so as to specifically target all individual properties (both commercial and residential) within 250 metres of the boundary of each of the site options, irrespective of whether the occupants were already being notified due to previous interest in the preparation of the MCS or emerging MLP. The 250 metre buffer acted as a basic guide rather than a strict limit. In many circumstances individual properties located beyond 250 metres, but which could also be affected were included. Any new interested parties who made a representation to the 2014 consultation were added onto the database and notified for subsequent consultations.
14. The County Council's planning consultation database expanded considerably during the numerous consultation activities and events that occurred between 2005 and 2016. The draft MLP consultation, which took place between September and November 2016, involved the individual notification by either post or email of 2,911 potentially interested parties.
15. In order to comply with the General Data Protection Regulations (GDPR), every consultee on the database was contacted prior to the regulations coming into force on 25th May 2018. The purpose of the exercise was to gain permission from for the their details to be retained on the minerals and waste database. Individual consultees who requested removal or did not respond to the GDPR consultation were removed from the database. Relevant organisations who did not respond were retained on the database but the contact details were anonymised.
16. Publication of the plan under Regulation 19 occurred between Thursday 31st May 2018 through to 5pm on Friday 13th July 2018 involved the individual notification by either post or email of 1168 potentially interested parties.

⁶ For more details about the local authorities that the County Council has identified as relevant to the Duty to Co-operate, please refer to the Duty to Co-operate Statement that accompanies the Publication (Pre-Submission) Plan.

How have potentially interest bodies been consulted during the preparation of the MLP?

Minerals Core Strategy (MCS) – consultation up to 2008

17. In 2005 the County Council began the process of replacing the adopted MLP (2003). This involved early stakeholder engagement introducing to the public, the County Council's intention to prepare a strategic-level, countywide MCS before investigating more localised matters such as site allocations. Early engagement included the distribution of several newsletters between June and November 2005. These newsletters invited interested parties to bring to the County Council's attention any mineral planning issues they believed warranted further investigation and also to establish the appetite for holding public meetings prior to preparing new planning documents. During July 2006 two half-day, invitational forum events took place at Whitemead Forest Park in the Forest of Dean and the Royal Agricultural College (RAC) campus near to Cirencester. These events discussed the likely mineral planning matters, which would be incorporated into a scoping document for widespread public consultation.
18. Between 22nd September and 17th November 2006 (an eight week period) the first major minerals consultation was carried out by the County Council. This included the release of several policy documents for public inspection and comment that outlined initial ideas of what might be contained in a MCS. This consultation was known as 'Issues & Options'.
19. In April 2007 a further newsletter was published. This provided a brief overview of the responses received to the "Issues & Options" consultation and the headline mineral planning issues.
20. A targeted consultation also took place during August 2007. It was focused on more technical matters and sought to ensure that the County Council had correctly represented the supporting evidence to accompany the MCS.
21. An additional half-day, invitational forum was held in October 2007 at the Guildhall in Gloucester. The forum introduced for the first time, clear policy options that may be taken forward into a comprehensive draft MCS.
22. For 6-weeks from 31st January to 13th March 2008 the County Council carried out its 2nd major mineral planning consultation – known as "Preferred Options". This involved making available for inspection and comment a main consultation document that included the detailed consideration of the realistic mineral policy options available and the proposed preferred choices for the County Council in preparing the MCS. The consultation also introduced a Sustainability Appraisal (SA); and Habitats

Regulations Assessment (HRA); and 14 individual topic-based technical evidence papers that explored the key issues affecting the main consultation paper.

Minerals Local Plan for Gloucestershire – consultation from 2013 onwards

23. The decision of the County Council to re-direct resources to complete the Gloucestershire Waste Core Strategy (WCS) brought about a lengthy break in the preparation of the MCS. During this period, major reforms to the planning system in operation across England were introduced. These were heavily reflected in the consultation activities and events that re-commenced mineral policy preparation from 2013 onwards. Most significant was the decision of the County Council to 'convert' the preparation of a MCS into a comprehensive local plan – the emerging MLP.
24. Between 23rd June and 18th August 2014 (an eight week period) the County Council launched a 3rd major minerals policy consultation – described as 'Site Options and Draft Policy Framework'. This introduced into the public arena eighteen site options for future mineral working, options for securing the future safeguarding of mineral resources and a suite of draft policies to be included in the emerging MLP. A comprehensive consultation document and a detailed site options supporting paper formed the central part of the consultation. Additional published documents included an accompanying SA, HRA and DtC evidence paper. Individual notifications inviting comments were sent by post or email to all potentially interested parties contained on the County Council's planning consultation database and letters were sent to the occupants of the nearby properties for each of the site options. All consultation documents were made available for inspection at council offices and libraries throughout Gloucestershire and also on County Council's website. In addition, six drop-in sessions were organised between the 1st and 15th July 2014 to facilitate enhanced access to information for local communities that could be affected by the proposed site options⁷. Each session provided access to the consultation documents, displayed information about the consultation and was attended throughout by officers from the County Council involved in the preparation of the emerging MLP.
25. An addendum consultation focused on an additional site option also took place from the 4th February until 18th March 2015. This followed the same approach as the previous consultation from summer 2014. A local drop-in session was also arranged on the 24th February 2015. This took place near to the location of the additional site option being considered.

⁷ The six drop in sessions included:- (1st July) Ruardean War Memorial Hall, Crossways, Ruardean; (3rd July) Kempsford Village Hall, Kempsford; (7th July) St Briavels Pavillion, Coleford Road, St Briavels; (10th July) Naunton Village Hall, Naunton; (11th July) Twynning Village Hall, Fleet Road, Twynning; and (15th July) Down Ampney Village Hall, Down Ampney Road.

26. The last consultation exercise to be carried out under regulation 18 was the draft MLP for Gloucestershire (2018-2032). This presented a full and comprehensive version of the minerals plan including the site options (*now known as candidate allocations*) that the Council, at that time, considered necessary to deliver the plan's vision, objectives and strategy. The consultation started on the 29th September 2016 and representations were recommended by no later than the 24th November 2016. The consultation incorporated: - the draft MLP document; a supporting technical evidence paper; updated SA and HRA; and a DtC progress report. Individual notifications were sent out via post or email to all potentially interested parties contained on the County Council's planning consultation database and all consultation documents were made available for inspection at council offices and libraries throughout Gloucestershire and also on County Council's website. Throughout the consultation period, social media techniques were also employed to stimulate wider public interest. Messages including a web link to the relevant consultation webpage were periodically posted on the County Council's twitter account.

Section 3 | a review of the main consultation issues identified and how these have been taken into account during the preparation stage of the MLP

Minerals Core Strategy (MCS) – consultation up to 2008

27. The first major mineral consultation known as 'Issues & Options' took place in autumn 2006. It resulted in representations being made by 46 different parties. To help stimulate debate, the consultation provided a series of broad questions, which sought to establish what priority policy areas should be investigated further and which early options considered by the County Council should be progressed, replaced or refined.
28. The need to prepare a long-term plan (of at least 10 years) was largely supported as were the themes identified in the initial draft spatial vision and objectives. However, there was a fair degree of consensus regarding the need for further refinement of the plan's objectives in order to support the achievement of sustainable development. The safeguarding of mineral resources including the future use of Mineral Consultation Areas (MCAs) also received positive feedback. Key policy areas of interest included: - the future approach to making provision for aggregates; the means by which the county's assets will be afforded protection; and the avoidance of cumulative impacts. A strong emphasis was also made of taking account of Gloucestershire's constraints as well as further investigation of how resources could be looked at strategically as well as within their established resource blocks. Particular attention was drawn to the need for a plan that will encourage consistency across all the mineral planning authorities that cover the Upper Thames Valley (UTV).
29. In preparing the initial policy options for the next plan preparation stage, the County Council took on board the representations made. It acknowledged the need to expand the spatial vision and provide more detail within the proposed objectives. A key area for further work was to ensure that the contents of the preferred options would be more locally-specific and better linked to challenges for the county. It was also noted that in considering how best to make provision for minerals from local resources, environmental capacity, viability and the realistic potential availability of minerals would need to be identified as headline themes founded upon carefully prepared and scrutinised evidence. In terms of restoration options, adopting a strategic approach would need to be incorporated alongside setting out particular local issues to be taken into account such as support for regeneration, environmental improvement and aerodrome safeguarding.

30. The 'Preferred Options' consultation of 2008 represented the 2nd major mineral planning consultation undertaken by the County Council. It generated representations from 53 interested parties. The structure of this consultation largely presented the preferences of the County Council in terms of either draft policies or the approach that should be taken with a number of mineral planning issues.
31. The revised draft spatial vision and strategy were mostly welcomed, although a few further comments seeking relatively minor revisions were acknowledged. The issue that stimulated the most interest was the appropriateness of the level of aggregate provision being considered for the county within the MCS. No overwhelming preferred options arose from the comments received, with respect to both crushed rock limestone and sand and gravel. However, for sand and gravel a more strategic, cross-boundary approach was favoured. Other areas focused on by respondents included the desire for an expanded local policy covering natural building stone and for a clearer policy link through mineral restoration to support the delivery of other spatial priorities for the county.
32. In considering the representations made, the County Council confirmed that the next plan preparation stage would explore the favoured option of a '*low as reasonably practicable*' approach to making provision for aggregates. A greater emphasis upon reducing demand for local primary minerals through seeking to enhance secondary and recycled aggregates would also be investigated. The emergence of regional policy at the time⁸ and consideration of draft new national and regional guidelines was acknowledged as the best means of highlighting the comparable significance of the different local constraints across the region the impact they may have on the future availability of mineral resources. In addition, a commitment was made to incorporating the ambitions of environmental regeneration across the Cotswold Water Park and to develop local policy on natural building stone further so as to reflect the benefits of its use such as affording support to local distinctiveness in architectural design.

Minerals Local Plan for Gloucestershire – consultation from 2013 onwards

33. The return of the County Council to policy making for minerals was marked by a 3rd major mineral planning consultation – described as Site Options and Draft Policy Framework. It introduced the County Council's new approach of preparing an all encompassing local plan for minerals (the emerging MLP) rather than a strategic-level MCS. It also put into the public domain possible site options for future mineral working. The consultation substantively took place over summer 2014, although an

⁸ During 2008 and 2009 consideration was being given to the draft revised National and Regional Guidelines for Aggregate Provision in England (2005 to 2020). This not only involved scrutiny of the draft overall regional distribution set out by the guidelines, but also the potential local expression of this. Authorities across the South West working alongside the SW Regional Assembly sought to establish a clear and consistent policy mechanism for determining how best to divide (apportion) the eventual South West regional figure for inclusion within their emerging local plans.

addendum consultation event was also carried out between February and March 2015. Overall almost 400 different respondents provided in excess of 3,500 individual representations.

34. The key issues raised included: - the proposed use of an annually-prepared Local Aggregate Assessment (LAA) to establish how much aggregate provision should be planned for to meet future needs; the need for a more critical review of the potential for non-Gloucestershire mineral resources (particularly crushed rock aggregate) to be exploited as an alternative to making local provision within the plan; and the quality of information collating in respect of the proposed site options. In terms of the responses to the site options, the future working of crushed rock aggregate at Hewlesfield and Clearwell in the Forest of Dean; and sand and gravel at Page's Lane and Redpool's Farm near Twynning generated the largest number of objections. Amenities, transport impacts and the possible affect on environmental quality proved particularly common concerns.
35. In addressing the responses received, the County Council sought to explain the methodology behind the Local Aggregate Assessment series and the fact that this approach elicited the best available evidence of trends relating to consumption, imports and exports of aggregate minerals. It was explained this was critical to determining the realistic prospect of developing a local policy for aggregate provision that would be able to sensibly accommodate non-Gloucestershire mineral resources as a means of meeting future demand. Assurances were made regarding the activities and resources given over to carrying out the Duty-to-Cooperate, particularly in respect of scrutinising strategic aggregate resource management with neighbouring and nearby authorities. In respect of the presented site option, the County Council fully appreciated that further technical work and consultation would be necessary before any firm decisions on the acceptability or otherwise of the candidate sites (or parts of sites) could be established. However, it was possible early on in the site assessment process, to confirm that several options would not be progressed. These include: - Hewlesfield (crushed rock) and Page's Lane (sand and gravel). The sites possessed considerable challenges that rendered them undeliverable within the anticipated time horizon of the emerging plan.
36. Consultation under regulation 18, presented the County Council's full draft version of the MLP. It occurred during autumn 2016. Responses were received from 1,067 individuals and different organisations with an interest in minerals planning in the county. The consultation generated 2,544 individual representations largely focused on the detailed draft policies and / supporting text set out in the main document and the proposed candidate allocations the County Council had deemed appropriate for inclusion in the draft plan.

37. Table 1 below presents a summary of the headline issues arising from the individual representations. It also provides a brief explanation of how the County Council (in its capacity as the MPA) has sought to take account of these issues when preparing the publication plan: -

Table 1: Summary of representations made under the ‘2016’ Regulation 18 consultation and response by the MPA

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
1.1 Introduction	28	<ul style="list-style-type: none"> • Concern about the future potential for oil and gas development in the county; • Lack of attention given to the impact on climate change and means of addressing it; • Failure to meet duty to cooperate requirements with matters that go beyond the county boundary; • The Sustainability Appraisal has not been carried out effectively 	Following careful consideration of the representations, a review of the introductory section of the plan was carried out. This has resulted in revisions to the publication plan's text. Most significantly, a specific reference to efforts to tackle climate change and its associated impacts have been incorporated along with changes to reflect evolving circumstances surrounding the decreased potential for oil and gas developments in the county. No specific changes were made concerning the how duty-to-cooperate has been carried out.
2.1 Spatial Portrait	25	<ul style="list-style-type: none"> • Lack of recognition of the important local characteristics of the Forest of Dean such as its complex hydrological system 	Following careful consideration of the representations, a review of the spatial portrait was carried out. This has resulted in several small revisions to the text aiming at clarifying factual points including the removal of any confusion regarding those areas with increased hydrological complexity in the county.
3.1 Drivers for change	27	<ul style="list-style-type: none"> • Driver E - concern about effectiveness of monitoring and controlling transport impacts; • Drivers F and G – concern about the ability to protect the natural and historic environments 	Following careful consideration of the representations, a review of the ‘drivers for change’ section of the plan was carried out. Whilst no notable changes were deemed necessary to the drivers that raised the most concern, a small number of revisions and the addition of several new drivers have been provided. The new drivers introduce ‘tackling climate change’ and ‘safeguarding and promoting health and well-being of local communities’ as stand-alone items.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
4.1 Vision	145	<ul style="list-style-type: none"> • Concern about the future potential for oil and gas development in the county; • Need to include a commitment to delivering desirable Duty to Cooperate outcomes; • Concern that restoration and amenity safeguards have been downgraded; • Need to include commitments towards happiness, quality of life and climate change 	<p>Following careful consideration of the representations, a review of the plan's proposed vision was carried out. This has resulted in a number of revisions being taken forward into the publication plan. These include: - an additional aspiration concerning the achievement of enhancements alongside minimising impacts; recognition of the possible opportunities to deliver increased resilience to and / or better adaption to climate change; the achievement of 'net gains' at a strategic level in terms of biodiversity rather than simply looking for environmental enhancements; the conservation of historic assets; a specific reference to flood prevention and / or alleviation; the potential for enrichment resulting from green infrastructure improvements; and the removal of oil and gas development as a realistic potential for Gloucestershire over the plan period.</p>
4.2 Objectives	29	<ul style="list-style-type: none"> • Lack of coherence with the policies set out in the rest of the plan; • Insufficient acknowledgement of the need to tackle climate change 	<p>Following careful consideration of the representations, a review of the plan's objectives was carried out. This has resulted in several revisions being taken forward into the publication plan. Most significantly, links to the plan's '<i>influencing drivers for change</i>' have been updated to deliver consistency and to enhance the plan's coherence from its initial aim and aspirations, the development of its overarching strategy and delivery through the suite of local plan policies.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
5.1 Strategy	188	<ul style="list-style-type: none"> • Concern about the future potential for oil and gas development in the county; • Concern over the local supply approach to contributing towards aggregate demand – particularly the lack of secondary and recycled aggregate substitution or reliance on working of resources outside of the county; • Insufficient attention given to: - tackling climate change, amenity impacts, restoration, mineral resource safeguarding 	Following careful consideration of the representations, a review of the plan's strategy objectives was carried out. This has resulted in several revisions being taken forward into the publication plan that are largely concerned with reflecting other revisions made elsewhere. For example; the parameters for potential exploration and production of oil & gas in the county have been removed as a consequence of the local plan policy being dropped from the publication plan. Promoting secondary and recycled aggregates as an alternative to primary aggregates is already a headlined strategy issue and therefore requires no further changes.
6.1 and 6.2 Policy SR01 Secondary & Recycled Aggregates and supporting text	197	<ul style="list-style-type: none"> • Policy needs to form part of a wider sustainable construction strategy; • Objection to the potential use of a local source of Incinerator Bottom Ash Aggregate (IBAA) as a recycled aggregate; • Questioning of whether the policy goes beyond the requirements of national policy. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This did not result in any significant revisions being required including the need to specifically exclude IBAA as recycled aggregate option. Although updated references to the linked sustainable construction policies from elsewhere in the local development plan have been introduced.
7.1 and 7.2 Policy MS01 Mineral Safeguarding Area and supporting text	36	<ul style="list-style-type: none"> • General support for safeguarding local mineral resources; • Concern that the proposed approach to implementation is not consistent with national policy. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a number of policy revisions concerning the inclusion of an economic viability test and link to an exemption list (previously set out in the draft plan under appendix 2: MSA implementation schedule). The supporting text has also been revised to accommodate the policy changes and to add further guidance on implementation.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
7.3 and 7.4 Policy MS02 Mineral Consultation Areas and supporting text	29	<ul style="list-style-type: none"> • General support for safeguarding local mineral resources; • Concern that the proposed approach to implementation is not consistent with national policy. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This resulted in the deletion of policy MS02 and its supporting text.
7.5 and 7.6 Policy MS03 Mineral Infrastructure Safeguarding and supporting text	28	<ul style="list-style-type: none"> • General support for safeguarding local mineral infrastructure; • Concern about overly restricting other development; • Particular concern expressed at the potential consequential restrictions on other forms of development at Sharpness Docks which has been safeguarded as mineral wharfage. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in the supporting text being revised to remove the fixed 150-metre safeguarding zone and replace it with location-related criteria.
8.1 Introduction to the future supply of minerals	10	<ul style="list-style-type: none"> • Clarification required in respect of the proposed way in which impacts on local communities will be judged. 	Following careful consideration of the representations a review of the introductory text concerning the future supply of minerals was carried out. This has result in an improved explanation about the balance being sought through the plan, between meeting the need for minerals and ensuring local communities and environments are sufficiently protected from harm.
8.2 and 8.3 Policy MW01 Aggregate provision and supporting text	36	<ul style="list-style-type: none"> • Questionable approach to determining future mineral supply requirements – should be focused on reducing demand; • Disagreement about using the existing evidence base on local supply trends to justify the continuation of a provision split between the two local crushed rock resource areas; 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision involving the inclusion of the 7 and 10 year landbanks. The supporting text has also been re-drafted to accommodate updated provision figures contained in the 6th Gloucestershire LAA.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>8.4 and 8.5</p> <p>Policy MW02 Natural building stone and supporting text</p>	<p>31</p>	<ul style="list-style-type: none"> • Should be more restrictive – only allow working where there is no alternative building materials available; • Lack of clarity about what is 'small-scale' mineral working; • Needs to reflect potential use with new builds not just historic assets; • Should not prejudice restoration; 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in policy revisions including a wider application to cover all building stone operations not just 'small-scale' workings and simplified approach towards restoration-related requirements. The supporting text has also been significantly re-drafted to provide greater clarity and detail as to what is expected in order to meet the policy. A Building Stone Assessment (BSA) requirement has been added and along with a requirement to demonstrate potential local economic benefits.</p>
<p>8.6 and 8.7</p> <p>Policy MW03 Clay for civil engineering purposes and supporting text</p>	<p>21</p>	<ul style="list-style-type: none"> • Should not allow working – more attention on managing a reduction in demand; • Lack of clarity as to whether this policy deals with 'borrow pits' 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision involving a change in requirements to demonstrate demand for clays used in civil engineering purposes rather than simply meeting the contribution towards steady and adequate supplies. An environmental acceptability test has also been added along with the need for evidence of local economic benefits. The supporting text has also been significantly re-drafted to provide greater clarity and detail as to what is expected in order to meet the policy.</p>
<p>8.8 and 8.9</p> <p>Policy MW04 Brick clay and supporting text</p>	<p>22</p>	<ul style="list-style-type: none"> • Should not allow working – more attention on managing a reduction in demand; • Lack of clarity as to what operators need to do meet the policy requirements 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision that requires evidence as to how supplies will support specific brickworks and secure benefits for the local economy. The supporting text has also been significantly re-drafted to provide greater clarity and detail as to what is expected by operators in order to satisfy the policy.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
8.10 and 8.11 Policy MW05 Coal and supporting text	27	<ul style="list-style-type: none"> • Support for presumption against coal working; • Support for acknowledging special status of Freeminers; • Concern about consistency with national policy; • Impacts on climate change are not sufficiently taken into account. 	Following careful consideration of the representations made a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision that acknowledges the local communities of the Forest of Dean could be a potential beneficiary from future coal working (through cultural or economic factors). The supporting text has also been expanded to provide an update on the current situation regarding coal as part of the evolving national energy strategy and to afford greater clarity and detail concerning what is expected by operators in order to comply with the policy.
8.12 and 8.13 Policy MW06 Oil & Gas and supporting text	678	<ul style="list-style-type: none"> • Widespread concern regarding a range of different potential environmental and amenity impacts associated with allowing oil and gas developments in the county; • Insufficient acknowledge of the potential impacts on climate change 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. In addition, local circumstances surrounding the conclusion of the last round of Petroleum Extraction Development Licensing (PEDL) have been monitored. This has resulted in the deletion of policy MW06 and its supporting text.
8.14 and 8.15 Policy MW07 Ancillary development and supporting text	34	<ul style="list-style-type: none"> • Support for the practice of removing permitted development rights and limiting the duration of future minerals development; • Should be more specific to restricting ancillary developments to rural localities only away from local communities; 	Following careful consideration of the representations made a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a number of policy revisions including: - a specific environmental acceptability test and demonstration of cultural heritage benefits. The supporting text has also been re-drafted to provide greater clarity and detail as to what is expected of operators in order to comply with the policy.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
9.1 and 9.2 Policy MA01 Aggregate working within allocations and supporting text	36	<ul style="list-style-type: none"> • Should not allow new working – more attention on managing a reduction in demand for aggregates; • Provision is unreasonably concentrated into one parish area; • Information about potential yields from allocation should be provided. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This did not result in any significant revisions being made, other than the inclusion of additional text to illustrate the timescales envisaged with the working of each allocation, which has been added to the allocation schedules.
9.3 and 9.4 Policy MA02 Aggregate working outside of allocations and supporting text	27	<ul style="list-style-type: none"> • Concern this represents an 'open door' policy to allowing unchecked mineral working – needs stronger safeguards against amenity and environmental impacts; • Should relate to wider local development plan policies; • Should include a preference towards extensions to existing workings over green field locations 	Following careful consideration of the representations, made a review of the policy and supporting text for inclusion in the publication plan has been carried out. This did not result in any significant revisions. The existing proposed criteria are deemed sufficient to reasonable accommodate a degree of policy flexibility, but to ensure enough checks and balances are in place not to undermine the approach of allocating areas for future aggregate working.
10.1 Introduction to Development management	14	<ul style="list-style-type: none"> • It should be required that prospective mineral operators directly engage with local communities before any development is allowed; • Ancillary developments shouldn't be allowed in the countryside; • All permitted development rights should be removed from proposals within Areas of Outstanding Natural Beauty (AONBs); • More attention should be given to taking into account potential cumulative impacts. 	Following careful consideration of the representations no revisions have been taken forward. It was considered that the matters brought forward had already been sufficiently dealt with either in this section or elsewhere in the plan.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
10.2 and 10.3 Policy DM01 Amenity and supporting text	40	<ul style="list-style-type: none"> • Requirement for Health Impact Assessments (HIAs) with all new proposals; • Concern that insufficient protection of local communities – the policy should not only seek to restrict ‘unacceptable’ mineral development but prevent ‘all’ potential adverse developments from taking place. 	Following careful consideration of the representations made a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision that introduces an additional requirement on strictly controlling potential adverse amenity impacts. The supporting text has also been re-drafted to provide greater clarity and detail as to what is expected from operators in order to comply with the policy. It includes advice on the need for and / or the preparation of Health Impact Assessments. It was not deemed reasonable to seek to prevent all potential adverse impacts from taking place.
10.4 and 10.5 Policy DM02 Cumulative impact and supporting text	30	<ul style="list-style-type: none"> • General support for including cumulative impact as a policy issue; • Concern that the supporting text does not offer sufficient clarity on how cumulative impact issue will be dealt with. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a policy revision that introduces an additional clause to facilitate potential benefits that could outweigh unacceptable cumulative impacts. The supporting text has been also been expanded to account for the additional clause.
10.6 and 10.7 Policy DM03 Transport and supporting text	48	<ul style="list-style-type: none"> • Request to include ‘open access’ land alongside Public Rights of Way (PRoWs); • Concern that highway safety was being afforded sufficient attention; • Concern that non-road method of transport were being appropriately and sufficiently encouraged. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a number of policy revisions including a sustainability requirement for non-road transport; a stricter threshold for assessing impacts on public safety related the highway network; and the inclusion of open access land. The supporting text has also been re-drafted to reflect the revisions to the policy.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
10.8 and 10.9 Policy DM04 Flood risk and supporting text	27	<ul style="list-style-type: none"> • Concern that the proposed approach was not consistent with national policy; • Concern that not all forms of flooding (surface, ground etc..) have been taken into account; • Particular concern that underground flooding and potential climate change impacts have not been taken into account; • Clarification sought that no sand and gravel working would be allowed in flood zone 3b. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in significant policy revisions to better reflect national flood risk policy requirements and to more clearly show how climate change impacts will be addressed. The supporting text, this has also been re-drafted to provide greater clarity and detail as to what is required by operators in order to comply with the policy.
10.10 and 10.11 Policy DM05 Water resources and supporting text	33	<ul style="list-style-type: none"> • Strengthening of policy was suggested. This would include – more safeguards for groundwater protection, clarification of use of hydrogeological impact assessments, controls on de-watering and flow diversion, and the use of buffer zones 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a number of policy revisions including: - a specific link to the key objectives for River Basin Management Plans (RBMPs); ensuring the physical integrity of water courses will be preserved; and the promotion of the efficient use of water. In addition, the supporting text has been re-drafted to provide greater clarity and detail as to what is required of operators in order to comply with the policy.
10.12 and 10.13 Policy DM06 Biodiversity and geodiversity and supporting text	38	<ul style="list-style-type: none"> • General support for seeking to protect the local environment; • Concern about approach to / and implementation of biodiversity offsetting; • Concern about ensuring environmental safeguards will be maintained; • Not enough consideration given to protecting ancient woodlands; • Climate change impacts not sufficiently taken into account. 	Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in a number of policy revisions including the potential for compensatory measures (i.e. off-setting) to be taken into account where an overall net gain is deliverable. For designated sites greater detail has also been provided concerning those factors / measures used to judge the acceptability of the Appropriate Assessment process. The supporting text has also been expanded to acknowledge the policy additions and to provide greater clarity and detail as to what is required of operators in order to comply with the policy.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>10.14 and 10.15</p> <p>Policy DM07 Soils and supporting text</p>	<p>23</p>	<ul style="list-style-type: none"> • Insufficient protection afforded to all soil resources and lack of policy clarification about what how this matter should be considered; • Climate change impacts not sufficiently take into account 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in significant policy revisions including an expansion of the policy coverage to incorporate all soil resources not just those identified as high Best and Most Versatile Agricultural Land (BMVAL) grades. Soil quality enhancements have also been added as a dedicated criterion. In terms of the supporting text this has been re-drafted to provide greater clarity and detail as to what is expected of operators in order to comply with the revised policy.</p>
<p>10.16 and 10.17</p> <p>Policy DM08 Historic environment and supporting text</p>	<p>39</p>	<ul style="list-style-type: none"> • Concern regarding consistency with national policy; • Insufficient prominence given to Heritage Impact Assessments; • Request for the Forest of Dean industrial heritage to be given a specific reference in policy. 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan has been carried out. This has resulted in significant policy redrafting and a new specific reference to the use of the Gloucestershire Historic Environment Record. The supporting text has also been revised to provide greater clarity and detail as to what is expected of operators in order to comply with the revised policy.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>10.18 and 10.19</p> <p>Policy DM09 Landscape and supporting text</p>	<p>26</p>	<ul style="list-style-type: none"> • Concern about the potential for new green field mineral working in AONBs; • Concern about the potential for new or expanded ancillary minerals development in sensitive rural locations; • Insufficient clarity in ensuring the protection of the county's landscapes. 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan was carried out. This has resulted in a number of policy revisions that seek new requirements. They include the consideration of the character, features and qualities of Gloucestershire's landscape areas both designated and undesignated; and the potential to achieve enhancement measures. For proposals that affect AONB designations, non-major and major minerals development criteria has also been more clearly defined. The supporting text has also been re-drafted to provide greater clarity and detail as to what is expected of operators in order to comply with the policy, particularly with 'major' mineral developments in AONBs.</p>
<p>10.20 and 10.21</p> <p>Policy DM10 Green belt and supporting text</p>	<p>19</p>	<ul style="list-style-type: none"> • General support for the continued protection of the Gloucester-Cheltenham Green Belt; • Some concern about the definition of 'very special circumstances' 	<p>Following careful consideration of the representations, no revisions have been taken forward into the publication plan as the draft policy was considered to be fully compliant with national policy. In addition, the supporting text to the draft policy already provides a clear explanation of what may constitute 'very special circumstances'. Nevertheless, the supporting text has been updated to acknowledge the recently adopted (Dec 2017) Gloucester-Cheltenham-Tewkesbury Joint Core Strategy and its status in setting the boundary of the Green Belt.</p>
<p>10.22 and 10.23</p> <p>Policy DM11 Aerodrome safeguarding and aviation safety and supporting text</p>	<p>20</p>	<ul style="list-style-type: none"> • Acknowledgement that the issue of aviation safeguarding has been taken into account; • Some concern that mineral infrastructure could heighten bird strike risks; • General support for including a dedicated aerodrome safeguarding policy. 	<p>Following careful consideration of the representations, no revisions have been taken forward into the publication plan as the draft policy was considered to be fully compliant with national policy.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>11.1 and 11.2</p> <p>Policy MR01 Restoration, aftercare and facilitating after-uses and supporting text</p>	<p>52</p>	<ul style="list-style-type: none"> • General support for a dedicated policy covering the restoration of mineral workings; • Concern it is not sufficiently robust to achieve desirable after-uses; • Concern about enforcement / financial commitments to ensure restoration will be successfully delivered. 	<p>Following careful consideration of the representations, a review of the policy and supporting text for inclusion in the publication plan was carried out. This has resulted in a number of policy revisions including the need to ensure that both the practice of undertaking restoration and aftercare as well as the end land use will not cause unacceptable adverse impacts and that proposed beneficial after-uses must demonstrate their contribution to delivering sustainable development, not just community and environmental improvements. The supporting text has also been significantly revised to provide much greater detail and clarity as to what is expected of operators (including the circumstances surrounding financial commitments) in order to comply with the policy.</p>
<p>12.1 and 12.2</p> <p>Introduction to managing and monitoring plan delivery and the plan's monitoring schedule</p>	<p>26</p>	<ul style="list-style-type: none"> • Concern that too much attention has been focused on support for further extraction and meeting market demand rather securing environmental and amenity protections; • Questionable as to the ability to achieve monitoring regime due to need for other local authorities to support data collection; • Lack of clarity as to what actions will be taken if parts of the plan are not working; • Clarification required to explain what a monitoring 'trigger' might be concerned with; 	<p>Following careful consideration of the representations, no substantial revisions have been taken forward. However, some clarification has been provided for with the monitoring targets to assist in monitoring the effectiveness of the delivery of the plan's policy. The supporting text has also been updated to reflect regulatory changes, which have introduced a mandatory 5-year plan review process.</p>
<p>13.1</p> <p>Appendix 1</p> <p>Key diagram</p>	<p>9</p>	<ul style="list-style-type: none"> • Clarification required as to whether there are a number of Mineral Safeguarding Areas (MSAs) or a single MSA covering Gloucestershire. 	<p>Following careful consideration of the representation, the Key diagram has been re-drafted to show the different resource areas rather than MSAs. This is better reflect the purpose of the diagram, which is to show areas where development over the plan period may occur. MSA are set out on the proposals map, which is available electronically.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
13.2 Appendix 2 Mineral Safeguarding Area Implementation Schedule	10	<ul style="list-style-type: none"> • General support for identifying development thresholds for mineral safeguarding; • Concern about the lack of guidance relating to an appropriately detailed Mineral Resource Assessment (MRA) 	Appendix 2 - MSA Implementation Schedule has been withdrawn from the publication version of the plan as a consequence of a series of proposed revisions set out under the response to question 7.1.
13.3 Appendix 3 Mineral Consultation Area Implementation Schedule	9	<ul style="list-style-type: none"> • No MCA-specific concerns identified. All comments related to generic issues such as a desire to see potential oil and gas development prevented from coming forward. 	Appendix 3 - MCA Implementation Schedule has been withdrawn from the publication version of the plan as a consequence of a series of proposed revisions set out under the response to questions 7.1 to 7.4.
13.4 Appendix 4 Safeguarded mineral infrastructure sites	8	<ul style="list-style-type: none"> • No safeguarding site infrastructure concerns identified. All comments related to generic issues such as a desire to see potential oil and gas development prevented from coming forward. 	Following careful consideration of the representations, only a small number of site updates have been taken forward.
13.5 Appendix 5 Summary forecast of aggregate supplies and provision figures	8	<ul style="list-style-type: none"> • No concerns regarding the aggregate provision requirements presented. All comments related to generic issues such as a desire to see potential oil and gas development prevented from coming forward. 	Following careful consideration of the representations, only data updates have been taken forward.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>13.6</p> <p>Allocation 01: Preferred Area at Stowe Hill / Clearwell – Detailed Development Requirements</p>	<p>123</p>	<ul style="list-style-type: none"> • Concern that future mineral working will have adverse impacts and could damage a number of environmental designations. • Concern that future mineral working will continue (and may worsen) current adverse impacts on local communities – in respect of dust, noise and traffic; • Concern that future mineral working will damage the local economy particularly tourism; • More attention should be given to promoting secondary and recycled aggregates – therefore future working would not be needed. 	<p>Following careful consideration of the representations, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters: - public health; economic impacts; vehicular routing including impacts on the Lydney Air Quality Monitoring Area (AQMA) and other highways restrictions; and the protection and potential enhancement of the natural environment. A very strong emphasis has also been placed on ensuring effective monitoring and management of the nearby Slade Brook SSSI.</p>
<p>13.7</p> <p>Allocation 02: Preferred Area at Drybrook – Detailed Development Requirements</p>	<p>13</p>	<ul style="list-style-type: none"> • Concern that future mineral working will have adverse impacts on the local landscape; • Concern that future mineral working will have adverse impacts on local communities – in respect of traffic, highway safety and loss of public footpaths. 	<p>Following careful consideration of the representations, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters: - possible impacts on public health; economic impacts; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for the enhanced risk associated with climate change impacts; soil resources; historic assets in the locality and their setting including the presence of archaeology; the protection and enhancement to the natural environment; and the opportunities that may arise during the implementation of site restoration and aftercare.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>13.8</p> <p>Allocation 03: Preferred Area at Stowfield – Detailed Development Requirements</p>	<p>17</p>	<ul style="list-style-type: none"> • Concern that future mineral working will have adverse impacts on the Wye Valley AONB designation and wider historic landscape; • Concern that future mineral working will continue (and may worsen) current adverse impacts on local communities – in respect of dust, noise, traffic and loss of public footpaths; • Concern that potential hydrological impacts have not been fully appreciated. 	<p>Following careful consideration of the representations a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters:- possible impacts on public health; economic impacts; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for the enhanced risk associated with climate change impacts; soil resources – with a focus on the impact to already safeguarded resources; the protection and enhancement of the natural environment; and the opportunities that may arise during the implementation of site restoration and aftercare.</p>
<p>13.9</p> <p>Allocation 04: Preferred Area at Daglingworth – Detailed Development Requirements</p>	<p>11</p>	<ul style="list-style-type: none"> • No allocation-specific representations were made. Although several generic comments related to the need to ensure heritage assets will be appropriately protected and that local amenity will be safeguarded were identified. 	<p>Whilst no allocation-specific representations were made, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the requested information from prospective applicants and priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters:- impacts on public health; economic impacts; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for the enhanced risk associated with climate change impacts; soil resources; historic assets in the locality and their setting including the presence of archaeology; the protection and enhancement of the natural environment; and the opportunities that may arise during the implementation of site restoration and aftercare.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
13.10 Allocation 05: Preferred Areas at Huntsman's – Detailed Development Requirements	13	<ul style="list-style-type: none"> • Concern that future mineral working will continue (and may worsen) current adverse impacts on local communities – in respect of traffic and highway safety (particularly with the proposed western preferred area); • Concern that future mineral working will have adverse impacts on the AONB designation 	Following careful consideration of the representations, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters: - possible impacts on public health; economic impacts; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for the enhanced risk associated with climate change impacts; soil resources; historic assets in the locality and their setting including the presence of archaeology; the protection of and potential enhancement of the natural environment; and the opportunities arising from the implementation of site restoration and aftercare.
13.11 Allocation 06: Specific Site at Manor Farm, Kempsford – Detailed Development Requirements	19	<ul style="list-style-type: none"> • Concern that future mineral working will continue (and may worsen) current adverse impacts on local communities – in respect of the risk of flooding, water resources due to the presence of a highly sensitive and complex hydrological system and bird hazard from the nearby military airfield. 	Following careful consideration of the representations, no revisions have been taken forward. as the candidate allocation was removed from the publication plan following planning permission being granted for aggregate working in May 2017 ⁹

⁹ Planning reference: - 13/0097/CWMAJM | Extension of sand and gravel extraction operations including the retention of all existing site administration, processing and access facilities, with restoration of the extension and existing site to agriculture and species rich grassland using imported inert materials to recreate the original land form at Manor Farm Quarry, Washpool Lane, Kempsford was granted permission on 15th May 2017. Information on planning applications considered by Gloucestershire County Council can be obtained at: - <https://www.gloucestershire.gov.uk/planning-and-environment/planning-applications/search-and-track-planning-applications/>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>13.12</p> <p>Allocation 07: Preferred Area at Redpool's Farm, Twynning – Detailed Development Requirements</p>	<p>167</p>	<ul style="list-style-type: none"> • Concern that future mineral working will have adverse impacts on local communities – in respect of dust, noise and traffic; • Concern that future mineral working will damage the local economy particularly local horticultural and leisure businesses; • Concern that the local hydrological system will be disrupted causing an increase risk of flooding and potential damage to the local ecology. 	<p>Following careful consideration of the representations, a review of the candidate allocation was carried out. The review concluded that the allocation should be removed from the publication plan. The reasons for this are concerned with the lack of certainty over deliverability during the plan's time horizon and questionable strategic value in terms of contributing to Gloucestershire's future provision requirements.</p>
<p>13.13</p> <p>Allocation 08: Area of Search at Lady Lamb Farm, Fairford – Detailed Development Requirements</p>	<p>19</p>	<ul style="list-style-type: none"> • Concern that future mineral working will create adverse impacts on local communities – in respect of the risk of flooding and water resources associated with the presence of a highly sensitive and complex hydrological system and bird hazard to the nearby military airfield; • Concern about the potential loss of public footpaths; • Concern about adverse impacts on local heritage assets 	<p>Following careful consideration of the representations, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters: - possible impacts on public health; economic impacts; highway routing – with a focus on avoiding impacts to Fairford and Lechlade; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for the enhanced risk associated with climate change impacts; soil resources; historic assets in the locality and their setting including the presence of archaeology; the protection and enhancement of the natural environment; and the opportunities that may arise during the implementation of site restoration and aftercare. No additional requirements were deemed necessary in terms of assessing the risk of bird hazard and aerodrome safety.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>13.14</p> <p>Allocation 09: Areas of Search at land between Kempsford and Whelford – Detailed Development Requirements</p>	<p>20</p>	<ul style="list-style-type: none"> • Concern that future mineral working will continue (and may worsen) current adverse impacts on local communities – in respect of the risk of flooding and water resources associated with the presence of a highly sensitive and complex hydrological system and bird hazard to the nearby military airfield; • Concern about the close proximity to residential properties; • Concern about loss of an existing sewage station; • Concern about negatively affecting the already approved site restoration associated with working at Manor Farm. 	<p>Following careful consideration of the representations made a review of the candidate allocation was carried out. The review concluded that the allocation should be removed from the publication plan. The reasons for this are concerned with the lack of certainty over deliverability during the plan's time horizon and questionable strategic value in terms of contributing to Gloucestershire's future provision requirements.</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
<p>13.15</p> <p>Allocation 10: Areas of Search at Down Ampney and Charlham Farm – Detailed Development Requirements</p>	<p>19</p>	<ul style="list-style-type: none"> • Concern that future mineral working will create new adverse impacts or generate cumulative impacts associated with other existing workings in the locality, for local communities – in respect of traffic, noise and dust; the risk of flooding and water resources linked to the presence of a highly sensitive and complex hydrological system; and bird hazard to the nearby military airfield • Concern about the close proximity to residential properties; • Concern about loss of valuable agricultural land; • Concern about adverse impacts on local heritage assets; • Concern about the ability to deliver the necessary restoration solution. 	<p>Following careful consideration of the representations, a review of the candidate allocation's Detailed Development Requirements was carried out. This resulted in a number of revisions to the information required from prospective applicants and the priorities for decision makers when considering future mineral developments. The revisions are concerned with the following matters: - possible impacts on public health; economic impacts; water resources and the inter-relationship to catchment-scale matters of interest; flood risk – particularly accounting for enhanced risk associated with climate change impacts; soil resources; historic assets in the locality and their setting including the presence of archaeology; the protection and potential enhancement to the natural environment; and the opportunities that may arise during the implementation of site restoration and aftercare. No additional requirements were deemed necessary in terms of assessing the risk of bird hazard and aerodrome safety.</p> <p>In addition, the candidate allocation area and status was also reviewed. This resulted in a reduction in the allocation size and change from an '<i>area of search</i>' to a '<i>preferred area</i>'. All parcels of land associated with Charlham Farm have been deleted and the southern, south-western, northern and north-eastern allocation boundaries have been re-drawn.</p>
<p>14.1</p> <p>Sustainability Appraisal (SA)</p>	<p>15</p>	<ul style="list-style-type: none"> • Unconvinced by the SA assessment for future potential oil and gas developments; • Concern that climate change wasn't given enough prominence in the SA assessment process. 	<p>Following careful consideration of the representations, no revisions to the structure or approach of the SA were deemed necessary. The SA is considered to be fully compliant with the regulatory requirements</p>

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
14.2 Habitats Regulations Assessment (HRA)	9	<ul style="list-style-type: none"> • In the future, for reasons of transparency, the representation received from Natural England in respect of the HRA should be made available to view. 	The comments made did not require any revisions to be made to the structure or approach of preparing the plan's HRA.
14.3 Duty to Cooperate (DtC)	16	<ul style="list-style-type: none"> • Concern that insufficient cooperative working has been demonstrated by the MPA – particularly in respect of crushed rock aggregate provision and the potential for alternative 'out-of-county' limestone resources to be used; • Concern that insufficient joint working has been carried out with Swindon Borough and Wiltshire Council in respect of planning for the future development of the Cotswold Water Park 	Following careful consideration of the representations, no changes have been deemed necessary to the way in which the County Council carries out DtC matters. To support the plan a comprehensive Duty to Cooperate (DtC) Statement has been prepared covering the full period from 2013 to 2018. The statement demonstrates how cooperative activities with prescribed DtC bodies have influenced and shaped the plan.
14.4 Supporting Evidence Paper	14	<ul style="list-style-type: none"> • Support for the decision to remove candidate allocations at Tywning (Page's Lane) and Hewlesfield prior to the draft MLP. 	Following careful consideration of the representations made no specific revisions have been taken forward into the publication plan. However, in support of the plan a updated Supporting Evidence Paper has been prepared. The paper explains how aggregate provision included in the plan has been calculated and how candidate allocations have been considered through the plan making process.

Question / part of draft plan	No. of representations received	Headline issues	Review by MPA and related changes to the Publication Plan
15.1 Other comments	51	<ul style="list-style-type: none"> • Insufficient prominence given to climate change impacts; • Concern about how the plan's requirements will be enforced and effectively monitored; 	<p>None of the additional comments have resulted in specific changes being taken forward into the publication plan. However, to address ongoing concern over the significance of climate change matters, greater prominence has been given to it throughout the plan. A number of specific references are set out in the individual strategy, objectives and relevant thematic policies. The changes to the monitoring schedule may hopefully address the concern raised about monitoring. However, enforcement matters are not directly related to plan, other than through ensuring a coherent local policy framework is in place for development to be effectively judged against.</p>

Section 4 | an analysis of stakeholder engagement and responses received to the Publication (Regulation 19) MLP

38. A notification was sent to all potentially interested parties to inform them that the Publication (Proposed Submission) MLP would be available for inspection and open to receive representations between 31st May and 13th July 2018. 43 individuals and different organisations with an interest in minerals planning in the county submitted representations to the County Council. In total, respondents generated 513 individual representations largely focused on the development plan policies and supporting text set out in the Publication MLP. This includes comments relating to the proposed allocations for aggregate working. All representations received were duly made as prescribed by regulation 20.
39. The table below presents a summary of the main issues arising from the individual representations: -

Table 2: Summary of representations and main issues under Regulation 19 of the Publication MLP

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Duty to Co-operate	12	6 representations consider the plan to be DtC compliant; 6 representations consider the plan be DtC non-compliant	<ul style="list-style-type: none"> • Failure to achieve effective co-operation on a highway matter with a neighbouring mineral planning authority (Wiltshire); • Failure to achieve effective co-operation on aggregate provision matters with neighbouring (South Gloucestershire) and other potentially-influential mineral planning authorities (North Somerset and Somerset), resulting in the preparation of an inappropriate aggregate strategy 	<ul style="list-style-type: none"> • The requirements of the Duty-to-Cooperate have been met. The evidence for this is set out in the Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP. It shows how the County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share relevant strategic minerals-related planning matters.
Sustainability Appraisal (SA)	10	7 representations do not raise any objection to the plan's SA; 3 representations consider the plan's SA to be deficient	<ul style="list-style-type: none"> • Concern about external regulatory processes; • Flawed process that does not rule out the inclusion of Allocation 01 – Land east of Stowe Hill Quarry • Accuracy of data applied in the SA 	<ul style="list-style-type: none"> • The plan's SA process has met with the requirements of section 19 of the Planning and Compulsory Purchase Act 2004. It has shown how the plan will promote sustainable development through appropriately assessing its ability to support the delivery of environmental, economic and social objectives relevant to minerals planning in the county. The SA has also considered reasonable policy alternatives during the preparation of the MLP and assisted in identifying matters concerning the mitigation and improvement to the county's environmental, social and economic conditions.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Habitat Regulations Assessment (HRA)	8	6 representations do not raise any objection to the plan's HRA; 2 representations consider the plan's HRA to be deficient	<ul style="list-style-type: none"> • Concern about external regulatory processes; • Impact of recent HRA-related CJEU ruling 	<ul style="list-style-type: none"> • The plan's HRA process has met with the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended). However, it is acknowledged that a recent CJEU ruling has created some potential assessment uncertainties. • To support the submission of the Publication MLP a technical note covering the plan's HRA and the CJEU ruling has been prepared.
Proposals Map	7	4 representations consider the proposals map to be sound; 3 representations consider the proposals map to be unsound	<ul style="list-style-type: none"> • Failure to take • account of recycled aggregates or alternative construction materials; • Allocation 01 – Land east of Stowe Hill Quarry should be removed 	<ul style="list-style-type: none"> • The proposals (policies) map performs its key task of illustrating geographically all of the land-use designations relevant to the policies contained in the Publication MLP. It is however, acknowledged that any future modifications during the remainder of the plan making process (including possible changes to allocations) would need to be reflective in a revised map.
Spatial portrait	9	8 representations present a factual comment or consider the spatial portrait to be sound; 1 representation considers the spatial portrait to be unsound	<ul style="list-style-type: none"> • Failure to state how the unsuitability of certain parts of the road network should act as a constraint on minerals development. • Clarification relating to listed buildings 	<ul style="list-style-type: none"> • The spatial portrait offers a reasonable background to the county, including its transport infrastructure. However, it is acknowledged that a minor clarification is required in respect of number of historic environment assets present in the county.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Drivers for change	7	5 representations present a comment or consider the drivers for change to be sound; 2 representations consider the drivers for change to be unsound	<ul style="list-style-type: none"> No justification for seeking to meet the stated need for minerals, which has resulted in the inclusion of an inappropriate allocation (Allocation 01 – Land east of Stowe Hill Quarry); Actions on climate change are too focused on tackling transport matters. 	<ul style="list-style-type: none"> The drivers for change perform their function, which is to highlight those matters that are expected to be influential (in a minerals-planning context) economically, socially and environmentally over the coming years. This includes due consideration to future demand for minerals.
Vision and supporting text	12	9 representations present a comment or consider the vision and / or supporting text to be sound; 3 representations consider the vision and / or the supporting text to be unsound.	<ul style="list-style-type: none"> Lack of clarity concerning how environmental impacts will be dealt with; Timeframe considered too short – should be looking beyond the 2030's. 	<ul style="list-style-type: none"> The vision represents a fair and reasonable view of Gloucestershire (in a minerals-planning context) over the coming years, through the delivery of the Publication MLP. It has evolved over a number of rounds of public consultation and is both aspirational and realistic in the time horizon it is working too and with what can be achieved, including from an environmental perspective.
Objectives and supporting text	10	7 representations present a comment or consider the objectives and / or supporting text to be sound; 3 representations consider the objectives and / or the supporting text to be unsound	<ul style="list-style-type: none"> Failure to acknowledge the limitations of planning system. Not all adverse impacts can be eradicated; No demonstration as to how secondary and recycled aggregate ambitions will be delivered. 	<ul style="list-style-type: none"> The objectives provide a clear and deliverable route to meeting the plan's vision. They propose achievable ambitions that are taken forward through the remainder of the plan's local policy framework. This can be seen in protection afforded to the amenity of local communities from adverse impacts; and the promotion of increased recycled and secondary aggregate usage.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Strategy and supporting text	14	11 representations present a comment or consider the plan's strategy and / or the supporting text to be sound; 3 representations consider the plan's strategy and / or supporting text to be unsound	<ul style="list-style-type: none"> • Failure to specifically reference SSSI designations; • Too narrow a view on delivering restoration. Doesn't support the potential for different types of beneficial after-uses. 	<ul style="list-style-type: none"> • The plan's strategy is proportionate, appropriately balanced and effective in providing a strong platform from which more detailed; location-specific policies have been able to evolve. In terms of restoration a broad policy approach has actually been taken, and this will help to avoid a narrowing of ambition and opportunities to deliver a range of beneficial after-uses;
Policy SR01 Maximising the use of secondary and recycled aggregates and supporting text	18	9 representations present a comment or consider policy SR01 and / or the supporting text to be sound; 9 representations consider policy SR01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Policy does not go far enough in promoting alternatives to / or restricting the use of primary aggregates; • Concern over the legitimacy / or deliverability of the policy. 	<ul style="list-style-type: none"> • Policy SR01 provides a proportionate and justified policy response to the ambition of increasing the use of alternatives to primary minerals – recycled and secondary aggregates. The supporting text is also clear as to how the policy requirements can be delivered through future planning proposals
Policy MS01 Non-mineral developments within MSAs and supporting text	14	8 representations present a comment or consider policy MS01 and / or the supporting text to be sound; 6 representations consider policy MS01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy is not strict enough in securing the safeguarding of mineral resources; • Additional policy exemptions to mineral resource safeguarding should be introduced. 	<ul style="list-style-type: none"> • Policy MS01 offers an effective and proportionate approach to delivering the safeguarding of mineral resource throughout Gloucestershire. The supporting text is clear as to how the policy should be applied and recognises that safeguarding is not always appropriate and / or necessary when considering different types and scale of non-minerals development. Nevertheless, it is acknowledged that changing national policy, which has been applied locally, may need to be taken into account.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Policy MS02 Safeguarding mineral infrastructure and supporting text	10	8 representations present a comment or consider policy MS02 and / or the supporting text to be sound; 2 representations consider policy MS02 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Concern that the policy is not flexible enough – should not be so rigidly applied in designated employment areas; Concern that the policy is not strict enough to prevent inappropriate development / loss of mineral infrastructure. 	<ul style="list-style-type: none"> Policy MS02 represents a proportionate response to the need to protect sites for mineral infrastructure from other development types throughout the county. The supporting text explains how the matter should be dealt with appropriately by applicants proposing future development, which could threaten existing safeguarded infrastructure.
Policy MW01 Aggregate provision and supporting text	10	9 representations present a comment or consider policy MW01 and / or the supporting text to be sound; 1 representation consider policy MW01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Failure to acknowledge the potential impact on future aggregate demand from technological advancements (a reduced need) – this should change the policy approach to the required aggregate landbanks 	<ul style="list-style-type: none"> Policy MW01 and supporting text set out an appropriate and justified approach to making provision for aggregates based on a credible evidence base. It is acknowledged that the policy could be made more flexible through a small revision to the policy text
Policy MW02 Natural building stone and supporting text	18	5 representations present a comment or consider policy MW02 and / or the supporting text to be sound; 13 representations consider policy MW02 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Failure of the policy to support the supply of building stone from quarries within Gloucestershire; Clarification needed on the levels of control over small-scale natural building proposals 	<ul style="list-style-type: none"> Policy MW02 is balanced and proportionate in facilitating the delivery of important supplies of natural building stone for the future, whilst taking into account the desirability of protecting valuable local environmental assets. Similarly the supporting text will ensure that proposals are sufficiently justified and afforded a robust evidential base.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Policy MW06 Ancillary minerals development and supporting text	18	6 representations present a comment or consider policy MW06 and / or the supporting text to be sound; 12 representations consider policy MW06 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Policy should be expanded so that 'ancillary' includes waste-related operations. It should also allow for permanent operations not just those tied to the life of minerals development Any comparative analysis should be restricted to only those circumstances where harm is caused – preventing the proliferation of mineral infrastructure should not be a core policy principle 	<ul style="list-style-type: none"> Policy MW06 presents a balanced and proportionate approach for responding to future proposals for ancillary minerals development. Although further clarification to the supporting text may wish to be explored at examination.
Policy MA01 Aggregate working within allocations and supporting text	16	5 representations present a comment or consider policy MA01 and / or the supporting text to be sound; 11 representations consider policy MA01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Allocation 01 – Land east of Stowe Hill Quarry should be removed on a number of grounds. Also, the justification presented is flawed as there is an over-provision of aggregates from within the Forest of Dean; Insufficient provision for sand & gravel as only 2 allocations have been taken forward 	<ul style="list-style-type: none"> Policy MA01 acts a robust, reasonable and deliverable means of ensuring there will be sufficient provision to maintain steady and adequate supplies of aggregates from Gloucestershire over the plan period. However, it is acknowledged that recent events could pose a serious challenge to the deliverability of one of the allocations and that this may only be resolved through a revision to omit this item from the emerging plan.
Policy MA02 Aggregate working outside of allocations and supporting text	14	7 representations present a comment or consider policy MA02 and / or the supporting text to be sound; 7 representations consider policy MA02 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Policy is too restrictive; Policy doesn't adequately consider the possibility of enabling development; Policy doesn't consider the possibility of 'borrow pit' development 	<ul style="list-style-type: none"> Policy MA02 offers a proportionate and rational method for responding to those circumstances that may arise where new aggregate working outside of allocations might be acceptable and beneficial. However, emerging events (a possible cross-border minerals development) could justify a review of the current policy wording and associated supporting text. A draft Statement of Common Ground has been prepared between the County Council and Worcestershire County Council, which sets out a possible agreeable modification to the Publication MLP in relation to revised text for Policy MA02

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Policy DM01 Amenity and supporting text	25	5 representations present a comment or consider policy DM01 and / or the supporting text to be sound; 20 representations consider policy DM01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy will allow Allocation 01 – Land east of Stowe Hill Quarry to come forward; • Concern over a lack of detail around restrictive buffer zones; • To onerous with unjustified requirements such as assessing odour; the carrying out of Health Impact Assessments (HIAs); having to consider amenity of communities along freight routes 	<ul style="list-style-type: none"> • Policy DM01 provides a reasonable and proportionate approach to responding to the issue of amenity protection.
Policy DM02 Cumulative impact and supporting text	11	6 representations present a comment or consider policy DM02 and / or the supporting text to be sound; 5 representations consider policy DM02 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy is too generalised and doesn't identify specific local areas where attention should be paid to cumulative impact 	<ul style="list-style-type: none"> • Policy DM02 provides a clear and robust policy framework for considering how to manage the occurrence of cumulative impacts. The supporting text provides applicants with guidance as to how to the matter will be scrutinised and how they should respond to any issues that might arise.
Policy DM03 Transport and supporting text	25	8 representations present a comment or consider policy DM03 and / or the supporting text to be sound; 17 representations consider policy DM03 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Failure of the policy to promote minimising the use of more sustainable, non-road based transport; • Failure of the policy to acknowledge 'severity' as the threshold for highways-related objections; • Failure to facilitate requirements for development contributions for matters wear and tear on the highway; 	<ul style="list-style-type: none"> • Policy DM03 represents an appropriate and realistic and approach to responding to transport issues that may occur with minerals development.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Policy DM04 Flood risk and supporting text	16	6 representations present a comment or consider policy DM04 and / or the supporting text to be sound; 10 representations consider policy DM04 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Policy is too onerous with an unjustified requirement for development to prove its resilience to flooding – irrespective of the risk • Policy inappropriate replicates national policy and guidance; • Additional climate change related elements need to be incorporated 	<ul style="list-style-type: none"> • It is acknowledged that revisions to Policy DM04 are needed to overcome a number of concerns raised. These revisions clarify the approach required by applicants to meet national policy and guidance on managing flood risk and also to better reflect measures to tackle climate change. • A co-signed Statement of Common Ground has been prepared between the County Council and the Environment Agency, which sets out a possible agreeable modification to the Publication MLP in relation to revised text for Policy DM04
Policy DM05 Water resources and supporting text	21	6 representations present a comment or consider policy DM05 and / or the supporting text to be sound; 15 representations consider policy DM05 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy will allow Allocation 01 – Land east of Stowe Hill Quarry to come forward; • Failure to define watercourses and then to appropriately consider them in terms of water resource management • Policy could better reflect the Water Framework Directive 	<ul style="list-style-type: none"> • It is acknowledged that revisions to Policy DM05 are needed to overcome a number of concerns raised. These revisions are focused on ensuring water quality matters are appropriately considered including a more accurate link to the Water Framework Directive. They also clarify the way in which watercourses should be taken into account. • A co-signed Statement of Common Ground has been prepared between the County Council and the Environment Agency, which sets out a possible agreeable modification to the Publication MLP in relation to revised text for Policy DM05

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Policy DM06 Biodiversity and geodiversity and supporting text	13	5 representations present a comment or consider policy DM06 and / or the supporting text to be sound; 8 representations consider policy DM06 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Questionable as to the need to consider legally protected species within the policy; • Concern that the policy is not restrictive enough – should not allow adverse impacts, particularly where damage to designated sites might occur; 	<ul style="list-style-type: none"> • Policy DM06 represents a balanced and proportionate approach to the consideration of biodiversity and geodiversity assets present throughout Gloucestershire and the different protections / enhancement regimes that should be employed with mineral developments. The policy has been prepared in close co-ordination with the key regulator – Natural England;
Policy DM08 Historic environment and supporting text	21	7 representations present a comment or consider policy DM08 and / or the supporting text to be sound; 14 representations consider policy DM08 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy considers undesignated assets the same as designated assets; • Failure to acknowledge that buried archaeology cannot be preserved; • Failure to reference the practice guide prepared by Historic England 	<ul style="list-style-type: none"> • Policy DM08 and supporting text provides an appropriate and proportionate response to mineral development proposals that could affect heritage assets present throughout Gloucestershire. It has been prepared under close scrutiny of the key regulator – Historic England.
Policy DM09 Landscape and supporting text	22	6 representations present a comment or consider policy DM09 and / or the supporting text to be sound; 14 representations consider policy DM09 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy is potentially 'to open' – in respect of the setting of the AONB designations; • Concern that the policy will allow Allocation 01 – Land east of Stowe Hill Quarry to come forward 	<ul style="list-style-type: none"> • Policy DM09 represents a balanced and proportionate approach to the consideration of the different landscape designations present within Gloucestershire and their relative importance in relation to minerals development. The policy has been prepared in close co-ordination with the key regulator – Natural England;
Policy DM10 Gloucester–Cheltenham Green Belt and supporting text	9	6 representations present a comment or consider policy DM10 and / or the supporting text to be sound; 3 representations consider policy DM10 and / or the supporting text to be unsound	<ul style="list-style-type: none"> • Concern that the policy isn't clear on whether associated plant would be covered; • Policy is not flexible enough and doesn't accommodate benefits of working in the Green Belt. 	<ul style="list-style-type: none"> • Policy DM10 provides a clear and accurate approach to responding to future mineral working in the Green Belt.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Policy MR01 Restoration, aftercare and facilitating beneficial after-uses and supporting text	24	13 representations present a comment or consider policy MR01 and / or the supporting text to be sound; 11 representations consider policy MR01 and / or the supporting text to be unsound	<ul style="list-style-type: none"> Concern that the policy offers little direction in respect of importing materials for site restoration; Concern that importation could be viewed as landfill rather than material recovery; Concern that the supporting text unjustifiably extends its authority into areas already covered by other environmental regulations 	<ul style="list-style-type: none"> Policy MR01 offers a coherent and proportionate approach to securing effective mineral restoration and aftercare post-mineral working. As a strategic policy it provides the direction needed to ensure detailed site-specific solutions are achievable that will result in desirable and beneficial outcomes. It is acknowledged that revisions, specifically to the supporting text may need to be explored at the examination in respect of the importation of material (e.g. inert waste) to support future restoration.
Appendix 4: Allocation 01 - Land east of Stowe Hill Quarry	12	5 representations present a comment or consider the allocation to be sound 7 representations consider the allocation to be unsound	<ul style="list-style-type: none"> Allocation 01 – Land East of Stowe Hill Quarry should be removed on a number of environmental grounds including the risk to a nearby SSSI designation (Slade Brook) 	<ul style="list-style-type: none"> The allocation forms part of a coherent and considered approach for ensuring there will be sufficient provision to maintain steady and adequate supplies of aggregates from Gloucestershire over the plan period. However, it is acknowledged that the recent events could seriously challenge the deliverability of the allocation. This may only be resolved through a revision to omit the allocation from the plan; Co-signed Statement of Common Grounds have been prepared between the County Council, the Environment Agency and Natural England, which include a possible agreeable modification to the Publication MLP in respect of its removal from the plan.

Theme / part of Publication MLP	No. of representations	Nature of representations	Main issues	Response by MPA to the main issues raised
Appendix 4: Allocation 04 –Land northwest of Daglingworth Quarry	7	6 representations present a comment or consider the allocation to be sound; 1 representation considers the allocation to be unsound	<ul style="list-style-type: none"> • Additional requirements concerning the management of water resources • Concern about the impact upon a nearby historic asset 	<ul style="list-style-type: none"> • The allocation is a reasonable and realistic option for contributing to the delivery of the plan in respect of aggregate provision. However, it is acknowledged that the detailed development criteria for future planning proposals would benefit from a revision ; • A co-signed Statement of Common Ground has been prepared between the County Council and the Environment Agency, which includes a possible agreeable modification to the Publication MLP in relation to the allocation and the management of water resources;
Appendix 4: Allocation 06 – Land south east of Down Ampney	9	5 representations present a comment or consider the allocation to be sound; 4 representation considers the allocation to be unsound	<ul style="list-style-type: none"> • Concern about how potential impacts will be assessed and / or dealt with including in respect of highways, amenity, historic assets, aerodrome safety and the natural environment (incorporating water); • Too onerous requirements - namely having to provide a Health Impact Assessment and Economic Impact Assessment 	<ul style="list-style-type: none"> • The allocation is a reasonable and realistic option for contributing to the delivery of the plan in respect of aggregate provision. However, it is acknowledged that the detailed development criteria for future planning proposals would benefit from a revision; • A co-signed Statement of Common Ground has been prepared between the County Council and the Environment Agency, which includes a possible agreeable modification to the Publication MLP in relation to the allocation and the management of water resources;

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72. Appendix 4: Allocation 07 – Land at Lady Lamb Farm, west of Fairford	5	6 representations present a comment or consider the allocation to be sound; 1 representation considers the allocation to be unsound	<ul style="list-style-type: none"> • Additional requirements concerning the management of water resources • Concern about aerodrome safety 	<ul style="list-style-type: none"> • The allocation is considered to be a reasonable and realistic option for contributing to the delivery of the plan in respect of aggregate provision. However, it is acknowledged that the detailed criteria for future planning proposals would benefit from a revision; • A co-signed Statement of Common Ground has been prepared between the County Council and the Environment Agency, which sets out a possible agreeable modification to the Publication MLP in relation to the allocation and the management of water resources ;